THE CITY OF SAN DIEGO

M E M O R A N D U M

DATE: February 2, 2026

TO: File

FROM: Jamie Kennedy

SUBJECT: Climate Action Plan (CAP) Memo for El Monte Pipeline No 2 (Project) (WBS # S-10008)

Introduction

The Engineering Capital Projects Department (ECP) Environmental Permitting Support (EPS) staff has requested ECC staff review the El Monte Pipeline No 2 (Project) pursuant to CEQA. The proposed project will include rehabilitation and repairs along 12.2 miles of the existing ELMP, including the Grossmont Tunnel. The purpose of the rehabilitation is to extend the pipeline's service life, enhance operational efficiency, and improve reliability. Improvements are proposed at approximately 69 locations comprising 1.35 acres along the existing pipeline, including improvements to and reconstruction of existing appurtenances, such as air valves, blowoffs, and access structures; installation of new isolation valves; and replacement of a deteriorated section of pipeline.

This memo is provided to demonstrate consistency with the City's 2022 Climate Action Plan (CAP), which is a qualified plan for the reduction of GHG emissions for use in cumulative impact analysis pertaining to projects under CEQA Guidelines Section 15183.5. The memo also analyzes the applicability of the City's Climate Action Plan Consistency Regulations.

CAP Regulations SDMC §143.1403

It is the purpose and intent of the Climate Action Plan Consistency Regulations to implement the City's Climate Action Plan (CAP) by applying regulations that reduce greenhouse gas emissions from specified development. Per San Diego Municipal Code §143.1403 (a), these regulations apply to:

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

The Project does not include the above features, and therefore is not subject to the City's CAP Consistency Regulations.

Project Consistency with CAP

Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the CAP. The CAP includes six strategies developed to reduce citywide GHG emissions and achieve the GHG reduction targets identified in the CAP. The project's consistency with these strategies is discussed below.

Strategy 1: Decarbonization of the Built Environment

This strategy aims to avoid greenhouse gas emissions from buildings across the City and improve indoor air quality. It includes measures to address emissions from existing buildings, municipal facilities, and new development.

The Project would not construct any new buildings or create new emissions from existing buildings or municipal facilities. While Strategy 2 is not directly applicable to the Project, the Project would not conflict with the applicable CAP goals and strategies identified in Strategy 1.

Strategy 2: Access to Clean and Renewable Energy

This strategy maintains the City's commitment to 100% renewable energy through San Diego Community Power, sets targets for converting the City's fleet of vehicles to electric, and aims to increase the number of electric vehicles used by our communities.

As a water improvement project, the Project does not include any features related to distributed energy generation, energy storage requirements, or new parking. While Strategy 2 is not directly applicable to the Project, the Project would not conflict with the applicable CAP goals and strategies identified in Strategy 2.

Strategy 3: Mobility and Land Use

This strategy focuses on emissions from transportation and includes actions that support mode shift through mobility and land-use actions and policies.

The Project includes the installation, replacement, and abandonment of underground water utilities within the developed right-of-way and would not result in any land use changes. An approved temporary Traffic Control Plan would be implemented during construction to ensure continued and ongoing circulation is available during construction-related activities. If necessary, temporary lane closures on roadways would not result in a permanent change to the level of services of the surrounding transportation system and would not impact any public transit facilities. While Strategy 3 is not directly applicable to the Project, the Project would not conflict with the applicable CAP goals and strategies identified in Strategy 3.

Strategy 4: Circular Economy and Clean Communities

This strategy maintains a 90% waste diversion rate, as well as methane capture from landfill and wastewater treatment facilities. It also includes actions to increase healthy food access and food recovery.

The Project includes the requirement for the construction contractor to comply with the latest edition of the City of San Diego Standard Specifications for Public Works Construction (Whitebook). Sections 5-14 of the Whitebook, Construction and Demolition Waste Management, requires a minimum waste management reduction goal and the preparation of a waste Management Form. The Project would comply with Municipal Code §§66.0601–66.0610 (the City's Construction and Demolition Debris Diversion Deposit Program). No impact to landfill, wastewater facilities, or food access or recovery would occur. Therefore, the Project would not conflict with the applicable CAP goals and strategies identified in Strategy 4.

Strategy 5: Resilient Infrastructure and Healthy Ecosystems

This strategy will help the City thrive in the face of the impacts of climate change through a greater focus on the greening of the City, starting with Communities of Concern. It also includes targets for the restoration of salt marshland for sequestration and increasing local water supply through Pure Water San Diego.

The Project would install and replace critical water utilities to maintain an adequate and reliable local water supply. The El Monte Pipeline, constructed between the years of 1942 and 1948, has been a reliable asset to the Alvarado system. This project focuses on the continued reliability of this raw water pipeline. The Project would fully mitigate for potential impacts to sensitive species and/or habitats. General nesting bird surveys and protections would be implemented in accordance with the latest edition of the Whitebook, Section 300, Earthwork. The Project would protect existing street trees in place to the extent feasible. In the event that street tree removal is required, the project would implement the City's "Street Tree Selection Guide" elements and would coordinate with the adjacent property owner for ongoing care and maintenance, as appropriate. Therefore, the Project would not conflict with the applicable CAP goals and strategies identified in Strategy 5.

Strategy 6: Emerging Climate Actions

Strategy 6 of the City's 2022 CAP addresses GHG emissions that will remain after all identified measures and actions have been achieved, including implementation of emerging climate actions. Further action, new policies, technological innovation, partnerships, and research are all necessary components of emerging climate actions that are beyond the 2022 CAP's ability to quantify and assess.

The Project would indirectly support broad goals and strategies as resilient water infrastructure is beneficial for the function of research facilities and innovation centers. Future maintenance and repairs would implement emerging technologies to reduce greenhouse gasses through the use of more efficient vehicles and maintenance methods. While Strategy 6 is not directly applicable to the Project, the Project does not include any features that would conflict with the City's action to implement Strategy 6.

Conclusion

Overall, the Project is consistent with each of the CAP's strategies and would not conflict with the City's CAP, CAP Consistency Regulations, or another applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions.