THE CITY OF SAN DIEGO

DRAFT
MITIGATED NEGATIVE DECLARATION

WBS No. S-10008
SCH No. N/A

SUBJECT: **El Monte Pipeline No 2**: The project proposes rehabilitation and repairs along 12.2 miles of the existing El Monte Pipeline, 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 open trench replacement of approximately 450 feet of deteriorated pipeline along El Monte Road. The project would also include repairs to curbs and gutters, sidewalks, and Americans with Disabilities Act (ADA) ramps at affected intersections, repairs to ornamental landscape in previously developed areas, and native plant revegetation in open space areas. The pipeline alignment is located in the cities of Santee, La Mesa, El Cajon, San Diego, and the unincorporated community of Lakeside. The project is approximately 12.2 miles long and extends from near Lake Jennings in the northeast to the Alvarado Water Treatment Plant at Lake Murray in the southwest (Navajo Community Planning Area, Council District 7). APPLICANT/SPONSOR: City of San Diego Engineering and Capital Projects

I. PROJECT DESCRIPTION:

See attached Initial Study.

II. ENVIRONMENTAL SETTING:

See attached Initial Study.

III. DETERMINATION:

The City of San Diego conducted an Initial Study, which determined that the proposed project could have a significant environmental effect in the following areas: **ARCHEOLOGICAL/HISTORICAL, BIOLOGICAL RESOURCES, and TRIBAL CULTURAL RESOURCES**. Subsequent revisions to the project proposal create the specific mitigation identified in Section V of this Mitigated Negative Declaration. The project, as revised, now avoids or mitigates the previously identified potentially significant environmental effects , and the preparation of an Environmental Impact Report will not be required.

IV. DOCUMENTATION:

The attached Initial Study documents the reasons to support the above Determination.

V. MITIGATION, MONITORING AND REPORTING PROGRAM:

A. GENERAL REQUIREMENTS – PART I Plan Check

1. Prior to beginning any construction-related activity on-site, the City Environmental Designee (ED) shall review and approve all Construction Documents (plans, specifications, details, etc.) to ensure the Mitigation, Monitoring and Reporting Program (MMRP) requirements have been incorporated.
2. In addition, the ED shall verify that the MMRP Conditions/Notes that apply ONLY to the construction phases of this project are included VERBATIM, under the heading, "ENVIRONMENTAL/MITIGATION REQUIREMENTS."
3. These notes must be shown within the first three (3) sheets of the construction documents in the format specified for engineering construction document templates as shown on the City website:

   http://www.sandiego.gov/development-services/industry/information/standtemp.shtml

4. The **TITLE INDEX SHEET** must also show on which pages the "Environmental/Mitigation Requirements" notes are provided.

B. GENERAL REQUIREMENTS – PART II Post Plan Check (Prior to start of construction)

1. **PRE-CONSTRUCTION MEETING IS REQUIRED PRIOR TO BEGINNING ANY WORK ON THIS PROJECT.** The APPLICANT/SPONSOR is responsible for arranging and performing this meeting by contacting the CITY RESIDENT ENGINEER (RE) of the Construction Management and Field Engineering Division of Engineering & Capital Projects Department (E&CP) and ED. Attendees must also include the APPLICANT/SPONSOR'S Representative(s), Job Site Superintendent, and the following monitors: **Biological Monitor, Archaeological Monitor, and Tribal Cultural Monitor**

   Note: Failure of all responsible APPLICANT/SPONSOR'S representatives and consultants to attend shall require an additional meeting with all parties present.

   CONTACT INFORMATION:
   a) The PRIMARY POINT OF CONTACT is the **RE** at the **Construction Management and Field Engineering Division – 858-627-3200**

   b) For Clarification of ENVIRONMENTAL REQUIREMENTS, it is also required to email the **RE and ED.**

2. **MMRP COMPLIANCE:** This Project shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the

satisfaction of E&CP Environmental Permitting Support (EPS), the ED, and the City Engineer (i.e., RE). The requirements may not be reduced or changed, but may be annotated (e.g. to explain when and how compliance is being met and the location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (e.g., specific locations, times of monitoring, methodology, etc.)

Note: APPLICANT/SPONSOR'S Representatives must alert the RE and ED if there are any discrepancies in the plans or notes, or any changes due to field conditions. All conflicts must be approved by the RE and ED BEFORE the work is performed.

3. **MONITORING EXHIBITS:** All consultants are required to submit to RE and ED a monitoring exhibit on an 11x17 reduction of the appropriate construction plan, such as site plan, grading, landscape, etc., marked to clearly show the specific areas, including the LIMIT OF WORK, scope of that discipline's work, and notes indicating when in the construction schedule that work will be performed. When necessary for clarification, a detailed methodology for performing the work shall be included.

4. **OTHER SUBMITTALS AND INSPECTIONS**: The APPLICANT/SPONSOR's representative shall submit all required documentation, verification letters, and requests for all associated inspections to the RE and ED for approval per the following schedule:

Document Submittal/Inspection Checklist		
Issue Area	**Document Submittal**	**Associated Inspection/Approvals/Notes**
General	Consultant Qualification Letters	Prior to Preconstruction Meeting
General	Consultant Construction Monitoring Exhibits	Prior to or at Preconstruction Meeting
Biology	Biologist Limit of Work Verification	Limit of Work Inspection
Biology	Biology Reports	Biology/Habitat Restoration Inspection
Cultural/Tribal Cultural Resources	Cultural/Archaeology Reports	Archaeology/Historic Site Observation

C. SPECIFIC ISSUE AREA CONDITIONS/REQUIREMENTS:

BIOLOGICAL RESOURCES

MM-BIO-1: RESOURCE PROTECTIONS DURING CONSTRUCTION

I. Prior to Construction

A. Biologist Verification: The owner/permittee shall provide a letter to the ED 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. Preconstruction Meeting: The Qualified Biologist shall attend the preconstruction 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 ED 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 Ordinance (ESL), project permit conditions; California Environmental Quality Act (CEQA); endangered species acts (ESAs); and/or other local, state or federal requirements.

D. BCME: The Qualified Biologist shall present a Biological Construction Mitigation/ Monitoring Exhibit (BCME) which includes the biological documents in C above. In addition, include: restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, burrowing owl exclusions, etc.), avian or other wildlife surveys/survey schedules (including general avian nesting and 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 ADD/ED. 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 ED and referenced in the construction documents.

E. Avian Protection Requirements: To avoid any direct impacts to coastal California gnatcatcher and burrowing owl, and any avian species that is listed, candidate, sensitive, or special status in the MSCP, removal of habitat that supports active nests in the proposed area of disturbance should 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 three (3) 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 City ED 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 and applicable State and Federal Law (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 shall be submitted to the City for review and approval, and implemented to the satisfaction of the City. The City's ED and Qualified 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. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora & fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize attraction of nest predators to the site.

G. Education: Prior to commencement of construction activities, the Qualified Biologist shall meet with the owner/permittee or designee and the construction crew and conduct an on-site educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna (e.g., explain the avian and wetland buffers, flag system for removal of invasive species or retention of sensitive plants, and clarify acceptable access routes/methods and staging areas, etc.).

II. During Construction

A. 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 ED on the 1st day of monitoring, the 1st week of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery.

B. Subsequent Resource Identification: The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna onsite (e.g., flag plant specimens for avoidance during access, etc.). 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.

III. Post Construction Measures

A. 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 law. The Qualified Biologist shall submit a final BCME/report to the satisfaction of the City ED within 30 days of construction completion.

MM-BIO-2 Burrowing Owl Pre-Construction Surveys.

I. Prior to Permit or Notice to Proceed Issuance:

A. As this project has been determined to be BUOW occupied or to have BUOW occupation potential, the Applicant Department or Permit Holder shall submit evidence to the Environmental Designee (ED) and Multiple Species Conservation Program (MSCP) staff verifying that a Biologist possessing qualifications pursuant to “Staff Report on Burrowing Owl Mitigation, State of California Natural Resources Agency Department of Fish and Game. March 7, 2012 (hereafter referred to as CDFG 2012, Staff Report), has been retained to implement a burrowing owl construction impact avoidance program.

B. The qualified BUOW biologist (or their designated biological representative) shall attend the pre-construction meeting to inform construction personnel about the City’s BUOW requirements and subsequent survey schedule.

II. Prior to Start of Construction:

A. The Applicant Department or 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. The report shall be submitted and approved by the ED, Wildlife Agencies (WAs), and/or City MSCP staff prior to construction or BUOW eviction(s) and shall include maps of the project site and BUOW locations on aerial photos.

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

C. 24 hours prior to commencement of ground disturbing activities, the Qualified Biologist shall verify results of preconstruction/take avoidance surveys. Verification shall be provided to the City’s ED and MSCP Staff. If results of the preconstruction surveys have changed and BUOW are present in areas not previously identified, immediate notification to the City and WAs shall be provided prior to ground disturbing activities.

III. During Construction:

A. **Best Management Practices** shall be employed as BUOWs are known to use open pipes, culverts, excavated holes, and other burrow-like structures at construction sites. Legally permitted active construction projects that are BUOW occupied and have followed all protocol in this mitigation section, or sites within 450 feet of occupied BUOW areas, should undertake measures to discourage BUOWs 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 not in use, and covering rubble piles, dirt piles, ditches, and berms.

B. **On-going BUOW Detection** - If BUOWs or active burrows are not detected during the pre-construction surveys, Section "A" below shall be followed. If BUOWs or burrows are detected during the pre-construction surveys, Section "B" shall be followed. NEITHER THE

MSCP SUBAREA PLAN NOR THIS MITIGATION SECTION ALLOWS FOR ANY BUOWs TO BE INJURED OR KILLED OUTSIDE OR WITHIN THE MHPA; in addition, IMPACTS TO BUOWs WITHIN THE MHPA MUST BE AVOIDED.

1. **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 CDFW Staff Report 2012 Appendix D methods 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).

    a. If no active burrows are found but BUOWs are observed to occasionally (1-3 sightings) use the site for roosting or foraging, they should be allowed to do so with no changes in the construction or construction schedule.
    b. If no active burrows are found but BUOWs are observed during follow-up monitoring to repeatedly (4 or more sightings) use the site for roosting or foraging, the City's ED and MSCP Sections 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.
    c. If a BUOW begins using a burrow on the site at any time after the initial pre-construction survey, procedures described in Section B must be followed.
    d. Any actions other than these require the approval of the City and the Wildlife Agencies.

2. **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 Appendix D CDFG 2012, Staff Report 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 which adheres to the required number of surveys in the detection protocol).

    a. This section (B) applies only to sites (including biologically defined territory) wholly outside of the MHPA – all direct and indirect impacts to BUOWs within the MHPA SHALL be avoided.
    b. If one or more BUOWs are using any burrows (including pipes, culverts, debris piles etc.) on or within 300 feet of the proposed construction area, the City's ED and MSCP shall be contacted. The City's MSCP and ED shall contact the Wildlife Agencies regarding eviction/collapsing burrows and enlist an appropriate City biologist for ongoing coordination with the Wildlife Agencies and the qualified consulting BUOW 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.

i. **Outside the Breeding Season** - If the BUOW is using a burrow on site outside the breeding season (i.e., September 1 – January 31), the BUOW may be evicted after the qualified BUOW 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 CDFW Staff Report 2012, Appendix F (or most recent guidance available) for review and submittal to Wildlife Agencies. Written concurrence from the Wildlife Agencies is required prior to Exclusion Plan implementation.

ii. **During Breeding Season** - If a BUOW is using a burrow on-site during the breeding season (Feb 1-Aug 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 BUOWs can be evicted. Eviction requires preparation of an Exclusion Plan prepared in accordance with CDFW Staff Report 2012, Appendix F (or most recent guidance available) for review and submittal to Wildlife Agencies. Written concurrence from the Wildlife Agencies is required prior to Exclusion Plan implementation.

c. **Survey Reporting During Construction** - Details of construction surveys and evictions (if applicable) carried out shall be immediately (within 5 working days or sooner) reported to the City's ED, MSCP, and the Wildlife Agencies and must be provided in writing (as by e-mail) and acknowledged to have been received by the required Agencies, ED, and MSCP.

IV. Post Construction:

A. Details of all surveys and actions undertaken on-site with respect to BUOWs (e.g., occupation, eviction, locations, etc.) shall be reported to the City's ED 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 BUOW locations on aerial photos.

MM-BIO-3 Species-Specific Sensitive Plant Surveys.

Focused surveys shall be conducted within work locations identified as supporting potentially suitable habitat (work locations 267+37 and 439+20) to determine presence/absence for 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 1B or 2B species previously observed or with moderate potential to occur within the study area. For species that can only be reliably detected during specific blooming periods, focus surveys may need to be conducted during those periods to determine presence/absence. If these species are detected during focused surveys, the work limits shall be modified to avoid direct impacts to mapped sensitive plant species.

MM-BIO-4A Compensatory Upland Mitigation

To compensate for the loss of 0.106 acres of coastal sage scrub and non-native grassland habitats located outside of the MHPA, mitigation would be provided through allocation of credits from the

Marron Valley Cornerstone Land Bank, which is located inside the MHPA. Payment and credit allocation shall be provided for a total of 0.056 acres to achieve the required mitigation ratios prior to the start of construction. EC&P shall be required to contribute the estimated average per-acre land cost, multiplied by the mitigation ratio, plus any required administration costs. The ED shall be provided with evidence of credit deduction prior to construction.

Vegetation Community or Land Cover Type[1]	Temporary Impacts (Acres)	Permanent Impacts (Acres)	Mitigation Ratio[3]	Mitigation Required (Acres)
Non-Native Grassland (IIIB)	0.089	0.011	0.5:1	0.050
Coastal Sage Scrub (II)	0.005	0.001	1:1	0.006
Total[2]	**0.094**	**0.012**		**0.056**

1 Oberbauer et al. 2008.
2 Some numbers may not sum due to rounding.
3 Mitigation in the MHPA, impacts outside of the MHPA

MM-BIO-4A Compensatory Wetland Mitigation

Prior to the initiation of construction, the project Applicant would obtain all necessary permits for impacts within the U.S. Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife jurisdictional areas and provide permits to the ED. Mitigation for the permanent loss of jurisdictional resources shall be negotiated with the resource agencies during the regulatory permitting process and shall ensure that mitigation to compensate for permanent impacts on jurisdictional resources is equivalent, or superior to, biological functions and values impacted by the proposed project.

Direct impacts to potentially jurisdictional aquatic resources, including City of San Diego (City) wetlands, would require mitigation to comply with City, state, and/or federal authorizations, in accordance with the City's Biology Guidelines. Mitigation required by the City is anticipated to satisfy federal (Clean Water Act Section 404) and state (California Fish and Game Code Sections 1601 and 1603) permit compensatory mitigation requirements, and additional mitigation is not anticipated to be identified in the California Environmental Quality Act document for impacts to potentially jurisdictional aquatic resources covered by any federal or state permits.

Impacts to 0.030 acres of City wetlands (including potentially jurisdictional aquatic resources) shall be mitigated through the purchase of 0.081 acres of credits at the Stadium Wetland mitigation site. The ED shall be provided with evidence of credit deduction prior to construction.

Vegetation Community or Land Cover Type[1]	Temporary Impacts (Acres)	Permanent Impacts (Acres)	Mitigation Ratio	Mitigation Required (Acres)
Emergent Wetland	0.003	0	2:1[2]	0.006
Non-Native Riparian	0.002	<0.001	0:1[4]	0
Southern Riparian Forest	0.002	0.023	3:1	0.075

	Total[3]	**0.007**	**0.023**	**N/A**	**0.081**

Notes: USACE = U.S. Army Corps of Engineers; RWQCB = Regional Water Quality Control Board; CDFW = California Department of Fish and Wildlife; City = City of San Diego.

1 Oberbauer et al. 2008.

2 Habitat type not listed in San Diego Biology Guidelines (SDBG) Table 2A; used 2:1 for "natural flood channel."

3 Some numbers may not sum due to rounding.

4 Removal/control of non-native plants is not considered to constitute a significant habitat impact, SDBG 2018.

MM-BIO-5: COASTAL CALIFORNIA GNATCATCHER

Prior to the issuance of any grading permit or prior to the preconstruction meeting, if a grading permit is not required, the ED shall verify that the MHPA boundaries and the following project requirements regarding the coastal California gnatcatcher are shown on the construction plans:

No clearing, grubbing, grading, or other construction activities shall occur between March 1 and August 15, the breeding season of the coastal California gnatcatcher, until the following requirements have been met to the satisfaction of the ED:

A. 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 decibels [dB(a)] hourly average for the presence of the coastal California gnatcatcher. Surveys for the coastal California gnatcatcher shall be conducted pursuant to the protocol survey guidelines established by the U.S. Fish and Wildlife Service within the breeding season prior to the commencement of any construction. If gnatcatchers are present, then the following conditions must be met:

I. Between March 1 and August 15, no clearing, grubbing, or grading of occupied gnatcatcher habitat shall be permitted. Areas restricted from such activities shall be staked or fenced under the supervision of a qualified biologist; AND

II. Between March 1 and August 15, no construction activities shall occur within any portion of the site where construction activities would result in noise levels exceeding 60 dB(a) hourly average at the edge of occupied gnatcatcher habitat. An analysis showing that noise generated by construction activities would not exceed 60 dB(a) hourly average at the edge of occupied habitat must be completed by a qualified acoustician (possessing a current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the ED at least two 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 a qualified biologist; OR

III. At least two weeks prior to the commencement of construction activities, under the direction of a qualified acoustician, noise attenuation measures (e.g., berms, walls) shall be implemented to ensure that noise levels resulting from construction activities will not exceed 60 dB(a) hourly average at the edge of habitat occupied by the coastal California gnatcatcher. 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 noise levels do not exceed 60 dB(a) 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).

* 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 dB (A) hourly average or to the ambient noise level if it already exceeds 60 dB (A) hourly average. If not, other measures shall be implemented in consultation with the biologist and the ED, as necessary, to reduce noise levels to below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. Such measures may include, but are not limited to, limitations on the placement of construction equipment and the simultaneous use of equipment.

B. If coastal California gnatcatchers are not detected during the protocol survey, the qualified biologist shall submit substantial evidence to the ED and applicable resource agencies that demonstrates whether or not mitigation measures such as noise walls are necessary between March 1 and August 15 as follows:

I. If this evidence indicates the potential is high for the coastal California gnatcatcher to be present based on historical records or site conditions, then condition A.III shall be adhered to as specified above.

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

ARCHAEOLOGICAL RESOURCES

MM-HIST-1: CONSTRUCTION MONITORING

I. Prior to Permit Issuance or Bid Opening/Bid Award

A. Entitlements Plan Check
1. Prior to permit issuance or Bid Opening/Bid Award, whichever is applicable, the ED shall verify that the requirements for Archaeological Monitoring and Native American monitoring have been noted on the applicable construction documents through the plan check process.

B. Letters of Qualification have been submitted to ED
   1. Prior to Bid Award, the applicant shall submit a letter of verification to the ED identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.
   2. ED would provide a letter to the applicant confirming that the qualifications of the PI and all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG.
   3. Prior to the start of work, the applicant must obtain written approval from ED for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

A. Verification of Records Search
   1. The PI shall provide verification to the ED that a site-specific records search (quarter-mile radius) has been completed. Verification includes, but is not limited to, a copy of a confirmation letter from South Coastal Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
   2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.
   3. The PI may submit a detailed letter to ED requesting a reduction to the ¼ mile radius.

B. PI Shall Attend Precon Meetings
   1. Prior to beginning any work that requires monitoring, the Applicant shall arrange a Preconstruction Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, RE, and ED. The qualified Archaeologist and Native American Monitor shall attend any grading/excavation-related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor.
      a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Preconstruction Meeting with the ED, PI, RE, and CM prior to the start of any work that requires monitoring.
   2. Acknowledgment of Responsibility for Curation (CIP or Other Public Projects)
      The applicant shall submit a letter to ED acknowledging their responsibility for the cost of curation associated with all phases of the archaeological monitoring program.
   3. Identify Areas to be Monitored
      Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11”x17”) to the ED identifying the areas to be monitored including the delineation of grading/excavation limits.

The AME shall be based on the results of a site-specific records search as well as information regarding the age of existing pipelines, laterals and associated appurtenances and/or any known soil conditions (native or formation).

The ED shall notify the PI that the AME has been approved.

4. When Monitoring Would Occur
   a. Prior to the start of any work, the PI shall also submit a construction schedule to the ED through the RE, indicating when and where monitoring would occur.
   b. The PI may submit a detailed letter to the ED prior to the start of work or during construction, requesting a modification to the monitoring program. This request shall be based on relevant information, such as a review of final construction documents, which indicate conditions such as the age of existing pipe to be replaced, the depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.
5. Approval of AME and Construction Schedule
   After the AME is obtained from the ED, the PI shall submit to the ED written authorization of the AME and Construction Schedule from the CM.

III. During Construction

A. Monitor Shall be Present During Grading/Excavation/Trenching
   1. The Archaeological Monitor shall be present full-time during all soil disturbing and grading/excavation/trenching activities that could result in impacts to archaeological resources as identified on the AME. The CM is responsible for notifying the RE, PI, and ED of changes to any construction activities, such as in the case of a potential safety concern within the area being monitored. In certain circumstances, OSHA safety requirements may necessitate modification of the AME.
   2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and ED. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop, and the Discovery Notification Process detailed in Section III.B-C and IV.A-D shall commence.
   3. The PI may submit a detailed letter to the ED during construction requesting a modification to the monitoring program when a field condition, such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered, that may reduce or increase the potential for resources to be present.
   4. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR's shall be faxed by the CM to the RE on the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to the ED.
   5. Per the project Cultural Research Report, it would be the responsibility of the monitor to complete a daily log addressing construction activities, personnel on site and results of the monitoring. A report summarizing the results of the monitoring effort and further recommendations shall be prepared and submitted to the SCIC once all work has been completed.

B. Discovery Notification Process
    1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to digging, trenching, excavating or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the ED. Once a potential resource has been identified, all work within 100 ft must be halted until the find can be assessed by a qualified archaeologist.
    2. The Monitor shall immediately notify the PI (unless the Monitor is the PI) of the discovery.
    3. The PI shall immediately notify the ED by phone of the discovery, and shall also submit written documentation to the ED within 24 hours by fax or email with photos of the resource in context, if possible.
    4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource, specifically if Native American resources are encountered.

C. Determination of Significance
    1. The PI and Native American consultant/monitor, where Native American resources are discovered, shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below.
        a. The PI shall immediately notify the ED by phone to discuss significance determination and shall also submit a letter to the ED indicating whether additional mitigation is required.
        b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program (ADRP) and obtain written approval of the program from the ED, CM and RE. ADRP and any mitigation must be approved by ED, RE, and/or CM before ground disturbing activities in the area of discovery would be allowed to resume. Note: If a unique archaeological site is also an historical resource as defined in CEQA Section 15064.5, then the limits on the amount(s) that a project applicant may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply.
            (1). Note: For pipeline trenching and other linear projects in the Public Right-of-Way, the PI shall implement the Discovery Process for Pipeline Trenching projects identified below under “D.”
        c. If the resource is not significant, the PI shall submit a letter to the ED indicating that artifacts would be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.
            (1). Note: For Pipeline Trenching and other linear projects in the public Right-of-Way, if the deposit is limited in size, both in length and depth; the information value is limited and is not associated with any other resource; and there are no unique features/artifacts associated with the deposit, the discovery should be considered not significant.
            (2). Note, for Pipeline Trenching and other linear projects in the public Right-of-Way, if significance cannot be determined, the Final Monitoring Report and Site Record (DPR Form 523A/B) shall identify the discovery as Potentially Significant.

D. Discovery Process for Significant Resources—Pipeline Trenching and other Linear Projects in the Public Right-of-Way

The following procedure constitutes adequate mitigation of a significant discovery encountered during pipeline trenching activities or for other linear project types within the Public Right-of-Way, including but not limited to excavation for jacking pits, receiving pits, laterals, and manholes to reduce impacts to below a level of significance:

1. Procedures for documentation, curation, and reporting
    a. One hundred percent of the artifacts within the trench alignment and width shall be documented in-situ, to include photographic records, plan view of the trench and profiles of side walls, recovered, photographed after cleaning and analyzed and curated. The remainder of the deposit within the limits of excavation (trench walls) shall be left intact.
    b. The PI shall prepare a Draft Monitoring Report and submit it to the ED via the RE as indicated in Section VI-A.
    c. The PI shall be responsible for recording (on the appropriate State of California Department of Parks and Recreation forms-DPR 523 A/B) the resource(s) encountered during the Archaeological Monitoring Program in accordance with the City's HRG. The DPR forms shall be submitted to the South Coastal Information Center for either a Primary Record or an SDI Number, and included in the Final Monitoring Report.
    d. The Final Monitoring Report shall include a recommendation for monitoring of any future work in the vicinity of the resource.

IV. Discovery of Human Remains

If human remains are discovered, work shall halt in that area and no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains; and the following procedures, as set forth in CEQA Section 15064.5(e), the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken:

A. Notification
1. Archaeological Monitor shall notify the RE, ED, and the PI if the Monitor is not qualified as a PI. ED would notify the appropriate archaeological qualified staff member within the City of San Diego to assist with the discovery notification process.
2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.

B. Isolate discovery site
1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenience of the remains.
2. The Medical Examiner, in consultation with the PI, would determine the need for a field examination to determine the provenience.

3. If a field examination is not warranted, the Medical Examiner would determine, with input from the PI, if the remains are or are most likely to be of Native American origin.

C. If Human Remains ARE determined to be Native American
   1. The Medical Examiner would notify the Native American Heritage Commission (NAHC) within 24 hours. By law, ONLY the Medical Examiner can make this call.
   2. NAHC would immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.
   3. The MLD would contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.5(e), the California Public Resources and Health & Safety Codes.
   4. The MLD would have 48 hours to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods.
   5. Disposition of Native American Human Remains would be determined between the MLD and the PI, and if:
      a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being granted access to the site, OR
      b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, the landowner shall reinter the human remains and items associated with Native American human remains with appropriate dignity on the property in a location not subject to further and future subsurface disturbance, THEN
      c. To protect these sites, the landowner shall do one or more of the following:
         (1) Record the site with the NAHC;
         (2) Record an open space or conservation easement; or
         (3) Record a document with the County. The document shall be titled “Notice of Reinterment of Native American Remains” and shall include a legal description of the property, the name of the property owner, and the owner’s acknowledged signature, in addition to any other information required by PRC 5097.98. The document shall be indexed as a notice under the owner's name.

D. If Human Remains are NOT Native American
   1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial.
   2. The Medical Examiner would determine the appropriate course of action with the PI and City staff (PRC 5097.98).
   3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the San Diego Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with the ED, a qualified City staff member, ECP management, the applicant/landowner, any known descendant group, and the San Diego Museum of Man.

V. Night and/or Weekend Work

A. If night and/or weekend work is included in the contract
   1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the preconstruction meeting.
   2. The following procedures shall be followed.
      a. No Discoveries
         In the event that no discoveries are encountered during night and/or weekend work, the PI shall record the information on the CSVR and submit it to ED via fax by 8 a.m. of the next business day.
      b. Discoveries
         All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction, and IV – Discovery of Human Remains. The discovery of human remains shall always be treated as a significant discovery.
      c. Potentially Significant Discoveries
         If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III-During Construction and IV-Discovery of Human Remains shall be followed.
      d. The PI shall immediately contact the RE and ED, or by 8 a.m. of the next business day, to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.

B. If night and/or weekend work becomes necessary during the course of construction
   1. The CM shall notify the RE a minimum of 24 hours before the work is to begin.
   2. The RE shall notify the ED immediately.

C. All other procedures described above shall apply, as appropriate.

VI. Post Construction

A. Submittal of Draft Monitoring Report
   1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix C/D), which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to the ED via the RE for review and approval within 90 days following the completion of monitoring. It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe as a result of delays with analysis, special study results or other complex issues, a schedule shall be submitted to the ED establishing agreed-upon due dates and the provision for submittal of monthly status reports until this measure can be met.
      a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program or Pipeline Trenching Discovery Process shall be included in the Draft Monitoring Report.
      b. Recording Sites with State of California Department of Parks and Recreation
         The PI shall be responsible for recording (on the appropriate State of California Department of Parks and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological

Monitoring Program in accordance with the City's HRG, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.

2. The ED shall return the Draft Monitoring Report to the PI via the RE for revision or, for preparation of the Final Report.
3. The PI shall submit the revised Draft Monitoring Report to the ED via the RE for approval.
4. The ED shall provide written verification to the PI of the approved report.
5. The ED shall notify the RE of receipt of all Draft Monitoring Report submittals and approvals.

B. Handling of Artifacts
   1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and cataloged.
   2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area, that faunal material is identified as to species, and that specialty studies are completed, as appropriate.

C. Curation of Artifacts: Accession Agreement and Acceptance Verification
   1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with the ED and the Native American representative, as applicable.

   2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE and ED.

   3. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to demonstrate protective measures were taken to ensure no further disturbance occurs in accordance with Section IV– Discovery of Human Remains, Subsection C.

D. Final Monitoring Report(s)
   1. The PI shall submit one copy of the approved Final Monitoring Report to the RE and one copy to the ED (even if negative), within 90 days after notification from the ED of the approved report.
   2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from the ED, which includes the Acceptance Verification from the curation institution.

VI. PUBLIC REVIEW DISTRIBUTION:

Draft copies or notice of this Mitigated Negative Declaration were distributed to:

Federal Government
US Fish and Wildlife (23)

State of California
CA Dept of Fish & Wildlife (32)

City of San Diego
Mayor's Office (91)
Councilmember Raul Campillo
Sam Johnson (77A)
Historical Resources Board (87)
City Attorney's Office (93C)

Other Local Jurisdictions
County of San Diego Planning & Development Services
City of Santee Planning & Building Department
City of El Cajon Community Development Department
City of La Mesa Community Development Department

Other Organizations, Groups, and Interested Individuals
Sierra Club San Diego Chapter (165)
San Diego Audubon Society (167)
Jim Peugh (167A)
CA Native Plant Society (170)
Endangered Habitats League (182A)
South Coastal Information Center (210)
San Diego History Center (211)
San Diego Archaeological Center (212)
Save Our Heritage Organisation (214)
Ron Christman (215)
Clint Linton (215B)
Inter-Tribal Cultural Resources (216)
San Diego County Archaeological Society, Inc. (218)
Native American Heritage Commission (222)
Kumeyaay Cultural Heritage Preservation (223)
Kumeyaay Cultural Repatriation Committee (225)
Native American Tribal Distribution (225 A-T)
The San Diego River Park Foundation (335)
Navajo Community Planning Group (336)
The San Diego River Coalition (335)
San Carlos Area Council (338)
Del Gardens Senior Social Club (339)
Mission Trails Regional Park (341)
Richard Drury
Molly Greene
Chase Preciado
John Stump

VII. 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.

Copies of the Mitigated Negative Declaration and associated project-specific technical appendices, if any, may be accessed on the City's CEQA webpage at https://www.sandiego.gov/ceqa/final.

Nancy Graham, AICP
Program Manager
Engineering and Capital Projects

_____
Date of Draft Report

_____
Date of Final Report

Analyst: Jamie Kennedy

Attachments: A. General Grading Guidelines for Paleontological Resources
Initial Study Checklist
Figure 1: Project Location
Figure 2: City and County Jurisdiction
Figure 3: Overall Project Site Plan and Key Map

INITIAL STUDY CHECKLIST

1. Project title/Project number: El Monte Pipeline No 2 / S-10008

2. Lead agency name and address: City of San Diego, Engineering and Capital Projects Department, 8525 Gibbs Dr. Suite 302, San Diego, California 92123

3. Contact person and phone number: Jamie Kennedy / (619) 533-6547

4. Project location: The project is located in the cities of San Diego, La Mesa, El Cajon, and Santee, and the unincorporated community of Lakeside, in central San Diego County, California. The project is approximately 12.2 miles long and extends from near Lake Jennings in the northeast to the Alvarado Water Treatment Plant at Lake Murray in the southwest. The Grossmont Tunnel is a 72-inch diameter reinforced concrete tunnel constructed in 1947 with an East portal off West Main Street in El Cajon, CA and a West portal off Amaya Drive in La Mesa, CA. The east portal will require extensive access for construction, repair and relining materials staging and storage and ventilation for worker safety. See Figure 1, Project Location and Figure 2, City and County Jurisdiction.

5. Project Applicant/Sponsor's name and address: Ramesis Bustamante, 8525 Gibbs Dr., Suite 302, San Diego CA, 92123

6. General/Community Plan designation: Various, see Figure 4 for the area Land Use

7. Zoning: County Zoning: S82, A72, S88, RR. La Mesa Zoning: R3, R1. El Cajon Zoning: M, RM 2200, RS-9, RS-6, C-R. Santee Zoning: N/A (ROW) City of San Diego Zoning: AR-1-1, RS-1-7

8. Description of project (Describe the whole action involved, including but not limited to, later phases of the project, and any secondary, support, or off-site features necessary for its implementation.):

   The City of San Diego (City) proposes rehabilitation and improvements to the El Monte Pipeline (ELMP) in San Diego County, California (Figure 1, Project Location). The ELMP is a critical raw-water transmission facility, which delivers water from two reservoirs, San Vicente and El Capitan, and from the San Diego County Water Authority's first aqueduct to the Alvarado Water Treatment Plant. Originally constructed in four distinct sections between 1942 and 1948, , the pipeline plays a key role in the region's water conveyance system. The project has two primary goals: (1) to develop a design that appropriately prescribes the means and methods necessary to extend the service life of this critical asset for the next 50 years, and (2) to provide the ability to dewater, safely access, inspect, and perform necessary repairs to proactively maintain this major raw water transmission main to the Advanced Water Treatment Plant (AWTP).

   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.

Key activities proposed as part of the project include the following:

- Rehabilitation of Sections I, II, and IV of the ELMP.
- Limited spot repairs to the interior of the pipe using existing pipeline manways for access (no ground disturbance).
- Open trench demolition and replacement of the easternmost 450 linear feet of the existing 48-inch pipeline along El Monte Road (Section I Station 0+00 to 4+50), including reconstruction of a flow meter vault. A trench width of approximately 6 feet, with additional width for pavement restoration, is required for the pipe replacement.
- Open trench demolition and reconstruction of existing access manways and blowoffs at various locations along 48-inch and 68-inch pipeline sections, including vault structures and a short segment of the existing pipeline. Disturbance areas are generally several feet beyond all sides of new vaults and pipe connections for excavation, shoring, materials, and equipment.
- Construction of new access manways in vaults at various locations along 48-inch and 68-inch pipeline sections, including open trench replacement of a short segment of existing pipeline where required for operation and maintenance of the pipeline. Disturbance areas are generally several feet beyond all sides of new vaults and pipe connections for excavation, shoring, materials, and equipment.
- Rehabilitation of existing access manways and blowoffs in vault structures at various locations requiring limited ground disturbance for replacement of existing hatches and improvements to piping and appurtenances within the vaults.
- Raising existing air valves above grade and demolishing existing air valve vaults at various locations requiring limited ground disturbance on top of or directly adjacent to the existing vault structure.
- Excavation and abandonment of buried pipeline access manways at various locations that are not accessible for operations and maintenance. Abandonment requires limited ground disturbance at the location of the manway for patching the encasement of the outlet.
- Construction of new pipeline isolation valves in vaults, including replacement of a segment of existing pipeline at four locations along 48-inch and 68-inch pipeline sections. Vaults are located in accessible disturbed areas to facilitate use by operations personnel and will require ground disturbance several feet beyond all sides of vaults and pipe connections to accommodate excavation, shoring, materials, and equipment.
- Raising the height of three air vents is required for the hydraulic performance of the pipeline. One location will require demolition and construction of a new vault structure
- Replacement of an existing 6-inch buried valve at a connection to the pipeline
- Demolition of an existing abandoned valve in a vault at work location 238+48, requiring limited ground disturbance to gain access and restore the surface.
- Condition Assessment and Rehabilitation of Section III (Grossmont Tunnel) of the ELMP.
- Excavation and demolition of a short segment of the existing 68-inch pipeline at the western tunnel portal for equipment and personnel access to the interior of the pipeline.

A trench width of approximately 9 feet, with additional width for surface restoration, is required for the pipe access.

- Grading of a gravel access road at the eastern tunnel portal.
- Internal condition assessment of tunnel pipeline (no ground disturbance).
- Internal grouting to seal infiltration along the tunnel pipeline (no ground disturbance).
- Centralized material and equipment staging and laydown areas along the pipeline to be identified by the contractor.

9. Surrounding land uses and setting:

A summary of the 69 work locations, the proposed improvements, the site conditions, and whether the site was assessed via a field visit or desktop analysis is provided in Table 1 below.

Table 1: Project Locations and Setting

Station	Improvement Type	Site Conditions and Habitat	Acres	City/County Jurisdiction
0+00 to 4+50	Replace segment with new CML&C, along with new appurtenances	Dirt shoulder of El Monte Road. Land cover types include developed, disturbed habitat, coastal sage scrub, non-native grassland, and non-native woodland.	0.200	Lakeside
10+81	Demolish and replace the blowoff with a new blowoff and manway vault	Dirt shoulder of El Monte Road. Land covers include developed and disturbed habitat.	0.003	Lakeside
15+77	Demolish the 48-inch RCSC and manway and replace with a new manway vault	Dirt shoulder of El Monte Road. Land covers include developed and disturbed habitat.	0.009	Lakeside
28+42	Demolish the 48-inch RCSC and manway and replace with a new manway vault	Unimproved sidewalk and dirt slope. Land covers include developed and disturbed habitat.	0.009	Lakeside
31+03	Demolish and replace AVAR with City Standard	Landscaped area at the corner of El Monte Road near Lakeside Christian Church. Land cover is developed.	0.003	Lakeside
40+29	Demolish the 48-inch RCSC and replace it with a new manway vault and blowoff	Sidewalk along Julian Avenue. Land covers include developed and disturbed habitat.	0.003	Lakeside
45+50	Demolish and replace the AVAR with City Standard	Driveway of a single-family home. Land covers are developed.	0.007	Lakeside
53+85	Demolish the 48-inch RCSC and manway and	Driveway of a single-family home. Land covers are developed.	0.009	Lakeside

Station	Improvement Type	Site Conditions and Habitat	Acres	City/County Jurisdiction
	replace with a new manway vault			
67+04	Excavate and abandon the manway	Unimproved sidewalk and yard. Land covers include developed, disturbed habitat, and non-native grassland.	0.083	Lakeside
79+47	Demolish the 48-inch RCSC and manway and replace with a new manway vault	Sidewalk and road along Julian Avenue. Land covers are developed.	0.009	Lakeside
88+38	Demolish and replace the AVAR with a City Standard	Sidewalk and landscaped yard along Julian Avenue. Land covers are developed.	0.009	Lakeside
91+89	Demolish the 48-inch RCSC and manway and replace with a new manway vault	Sidewalk and road along Julian Avenue. Land covers are developed.	0.009	Lakeside
106+48	Demolish the 48-inch RCSC and manway and replace with a new manway vault	Sidewalk, road, and asphalt driveway along Los Coches Road. Land covers are developed.	0.018	Lakeside
109+80	Entry portal for pipe repairs	Driveway along Los Coches Road. Land covers are developed.	0.005	Lakeside
112+07	Demolish the 48-inch RCSC and manway and replace with a new manway vault	Sidewalk, road, and parking lot along Woodside Avenue. Land covers are developed.	0.009	Lakeside
112+32	Demolish and replace the AVAR with a City Standard	Sidewalk, road, and parking lot along Woodside Avenue. Land covers are developed.	0.014	Lakeside
124+38	Demolish and replace the AVAR with a City Standard	Sidewalk and parking lot along Woodside Avenue. Land covers are developed.	0.005	Lakeside
125+48	Construct a vault at the existing manway	Sidewalk and parking lot along Woodside Avenue. Land covers are developed.	0.009	Lakeside
138+85	Excavate and abandon the manway	Intersection of Woodside Avenue and Winter Gardens Boulevard. Land covers are developed.	0.002	Lakeside
148+35	Construct a vault at the existing manway	Parking lot along Woodside Avenue. Land covers are developed.	0.009	Lakeside
177+92	Rehabilitate the vault, manway, and blowoff	Ruderal vegetated area south of Woodside Avenue. Land covers	0.005	Lakeside

Station	Improvement Type	Site Conditions and Habitat	Acres	City/County Jurisdiction
		include developed and disturbed habitat.		
187+30	Demolish & replace the AVAR with a City Standard	Service road surrounded by coastal sage scrub. Land covers include disturbed habitat and coastal sage scrub.	0.009	Lakeside
194+87	Excavate and abandon the manway	Parking lot east of Woodside Avenue. Land covers are developed.	0.002	City of Santee
208+65	Construct a vault at the existing manway	Parking lot southeast of Woodside Avenue. Land covers are developed.	0.009	City of Santee
220+85	Rehabilitate the vault, manway, and blowoff	Landscaped area southeast of Woodside Avenue. Land covers are developed.	0.004	City of Santee
226+29	Demolish and replace the AVAR with a City Standard	Landscaped slope southeast of Woodside Avenue. Land covers are developed.	0.009	City of Santee
238+48	Demolish the valve and abandon the vault	Driveway east of Woodside Avenue. Land covers are developed.	0.002	City of Santee
239+45	Demolish and replace the 68-inch RCSC, manway, and blowoff with a new valve vault	Parking lot east of Woodside Avenue. Land covers are developed.	0.037	City of Santee
254+20	Construct a vault at the existing manway	Vegetated terrace east of Woodside Avenue. Land covers include developed, disturbed habitat, non-native grassland, and coastal sage scrub.	0.009	City of Santee
267+37	Rehabilitate the manway and replace the AVARs with a City Standard	Vegetated slope west of Sevilla Street. Land covers include coastal sage scrub, developed, and disturbed habitat.	0.009	City of Santee
294+26	Construct a vault at the existing manway	Prospect Avenue at the intersection with Magnolia Avenue. Land covers are developed.	0.007	City of Santee
303+20	Demolish and replace the 68-inch RCSC with a new valve vault	Parking lot within an industrial/commercial area. Land covers are developed	0.042	City of Santee
322+52	Rehabilitate the vault, manway, and blowoff	Grass field adjacent to Gillespie Field airport. Land covers include non-native grassland and developed.	0.013	City of El Cajon and County of San Diego
335+83	Excavate and the abandon manway	Grass field adjacent to Gillespie Field airport. Land cover is non-native grassland.	0.002	City of El Cajon and County of San Diego

Station	Improvement Type	Site Conditions and Habitat	Acres	City/County Jurisdiction
345+20	Demolish and replace the 68-inch RCSC with a new manway/blowoff vault	Dirt lot north of Bradley Avenue. Land covers include developed, disturbed habitat, and non-vegetated channel.	0.020	City of El Cajon
349+12	Excavate and abandon the manway and vault	Parking lot in an industrial area. Land covers are developed.	0.002	City of El Cajon
363+04	Demolish and replace the AVAR with a City Standard	Pavement on North Johnson Avenue. Land covers are developed.	0.006	City of El Cajon
365+62	Rehabilitate the vault, manway, and blowoff	Center Pointe Business Park parking lot. Land covers are developed.	0.008	City of El Cajon
367+30	Demolish and replace the 8-inch gate valve	Pavement on Vernon Way. Land covers are developed.	0.001	City of El Cajon
380+15	Demolish and replace 68-inch RCSC & AVAR vault with new manway/AVAR vault to with a City Standard	Parking lot north of Fesler Drive. Land covers include developed and non-vegetated channel.	0.009	City of El Cajon
382+78	Rehabilitate the vault and manway	Dirt area between a parking lot and the Forester Creek channel. Land covers include developed, disturbed habitat, and non-vegetated channel.	0.011	City of El Cajon
396+61	Excavate and abandon the manway	Asphalt on North Marshall Avenue. Land covers are developed.	0.002	City of El Cajon
400+64	Demolish and replace the 68-inch RCSC with a new manway vault	Industrial yard west of North Marshall Avenue. Land covers are developed.	0.009	City of El Cajon
410+85	Rehabilitate the vault and manway	Dirt shoulder south of Bill Beck Park. Land covers are developed.	0.005	City of El Cajon
434+35	Demolish and replace with a new vent and manway in the vault	Grassy slope west of Dewane Drive. Land covers include non-native grassland, developed, and disturbed habitat.	0.086	City of El Cajon
439+20	Access to the tunnel portal Rehabilitate the vault, manway, and blowoff	Small canyon south of West Main Street with streams. Land covers include coastal sage scrub, coast live oak woodland, non-native woodland, non-native riparian, and southern riparian forest.	0.149	City of El Cajon
512+75	Raise the vent pipe by 24 feet	Paved area within apartment complex north of Amaya Drive. Land covers are developed.	0.002	City of La Mesa

Station	Improvement Type	Site Conditions and Habitat	Acres	City/County Jurisdiction
515+50	Construct the runnel portal	Parking lot of Amaya Drive Trolley Station. Land covers are developed.	0.043	City of La Mesa
521+52	Demolish and replace the 68-inch RCP, manway, and vault with a new manway vault	Apartment complex parking lot south of Fletcher Parkway. Land covers are developed.	0.009	City of La Mesa
530+10	Rehabilitate the vault, manway, and blowoff	Dirt slope south of Fletcher Parkway and beneath State Route 125 overpass. Land covers include disturbed habitat and coastal sage scrub.	0.011	City of La Mesa
533+04	Demolish and replace the AVAR with a City Standard	Medical center parking lot on Fletcher Parkway. Land covers are developed.	0.008	City of La Mesa
542+96	Demolish and replace the 68-inch RCP, manway, and vault with a new manway vault	Parking lot in a commercial area on Fletcher Parkway. Land covers are developed.	0.009	City of La Mesa
555+79	Demolish and replace the 68-inch RCP, manway, blowoff, and vault with a new manway/blowoff vault	Landscaped area with a culvert outlet resulting in a channel and riparian vegetation. Land covers include disturbed habitat, developed, emergent wetland, and non-native riparian.	0.063	City of La Mesa
561+33	Demolish and replace the AVAR with a City Standard	Hardscaped/landscaped area on Parkway Drive. Land covers are developed.	0.009	City of La Mesa
565+40	Excavate and abandon the manway	Hardscaped/landscaped area on Parkway Drive. Land covers are developed.	0.004	City of La Mesa
575+32	Demolish and replace the 68-inch RCP and manway with a new valve vault	Ornamental vegetation area at the intersection of Fletcher Parkway and Jackson Drive. Land covers are developed.	0.117	City of La Mesa
584+98	Excavate and abandon the manway	Driveway on Fletcher Parkway. Land covers are developed.	0.004	City of La Mesa
594+32	Demolish and replace the 68-inch RCP, manway, blowoff, and vault with a new manway/blowoff vault	Median island at Fletcher Parkway and Marengo Avenue. Land covers are developed.	0.040	City of La Mesa

Station	Improvement Type	Site Conditions and Habitat	Acres	City/County Jurisdiction
606+13	Demolish and replace the AVAR with a City Standard	Landscaped area near pool at 5333 Baltimore Drive. Land covers are developed.	0.008	City of La Mesa
608+63	Demolish and replace the 68-inch RCP, manway, blowoff, and vault with a new manway/blowoff vault	Pavement of Baltimore Drive. Land covers are developed.	0.011	City of La Mesa
612+60	Demolish and replace the AVAR with a City Standard	Parking lot/ornamental vegetation area on Baltimore Drive. Land covers are developed.	0.009	City of La Mesa
617+51	Demolish and replace the 68-inch RCP, manway, blowoff, and vault with a new manway/blowoff vault	Landscaped area within apartment complex. Land covers are developed.	0.039	City of La Mesa
626+03	Demolish and replace the AVAR with a City Standard	In the parking lot at 5464 Baltimore Dr. Land covers are developed.	0.002	City of La Mesa
632+33	Demolish and replace the 68-inch RCP, manway, blowoff, and vault with a new manway/blowoff vault	Landscaped slope and low area between apartment complexes south of Lake Murray Boulevard with hydrology resulting in wetland vegetation. Land covers include disturbed wetland, non-native woodland, disturbed habitat, and developed.	0.027	City of La Mesa
638+59	Demolish and replace the AVAR with a City Standard	Ornamental vegetation area within Sunset Park. Land covers include non-native woodland, disturbed habitat, and developed.	0.009	City of La Mesa
644+21	Demolish and replace the 68-inch RCP, manway, blowoff, and vault with new manway/blowoff vault	Vault situated above an intermittent channel and culvert outlet on Lake Park Way. Land covers include developed and non-native riparian.	0.014	City of La Mesa
651+00	Raise the vent pipe above grade with a screen, enclosure, and housekeeping pad	Open space patch north of apartment buildings. Land covers include non-native grassland, non-native woodland and developed.	0.002	City of San Diego (Navajo, CD7)
653+97	Demolish and replace the 68-inch RCP, manway, blowoff, and	Ornamental vegetation area adjacent to the open space patch on Kiowa Drive. Land covers include	0.007	City of San Diego (Navajo, CD7)

Station	Improvement Type	Site Conditions and Habitat	Acres	City/County Jurisdiction
	vault with a new manway/blowoff vault	non-native grassland and developed.		
658+50	Demolish and replace the valve	Paved area within the water treatment plant property. Land covers are developed.	0.007	City of San Diego (Navajo, CD7)

Notes: CML&C = cement mortar lined and coated; RCSC = reinforced concrete steel cylinder; AVAR = air vacuum and release valve; City = City of San Diego; RCP = reinforced concrete pipe; Lakeside = Lakeside – Unincorporated San Diego County

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

- U.S. Army Corps of Engineers Section 404 Permit
- U.S. Fish and Wildlife Service Biological Opinion
- CA Dept of Fish & Wildlife Streambed Alteration Agreement
- CA State Revolving Fund Program, State Water Resources Control Board Funding
- Regional Water Quality Control Board 401 Water Quality Certification
- City of La Mesa Encroachment Permit and Traffic Control Permit
- City of Santee Encroachment Permit
- County of San Diego Right-of-Way Excavation Permit, Encroachment Permit, and Traffic Control Permit
- City of El Cajon Encroachment Permit
- Access agreements and/or easements, as needed

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, has consultation begun?

Tribal Consultation under AB 52 was conducted for the referenced project in accordance with the requirements of Public Resources Code 21080.3.1. The City of San Diego provided formal notification to the Iipay, Jamul, and San Pasqual tribes, who have requested notification of projects and are traditionally and culturally affiliated with the project area, on April 6, 2026, for 30 days ending on May 6, 2026. The City of San Diego received no response from any of the tribes, and Tribal Consultation has concluded.

Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21083.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.96 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐	Aesthetics	☐	Greenhouse Gas Emissions	☐	Public Services
☐	Agriculture and Forestry Resources	☐	Hazards & Hazardous Materials	☐	Recreation
☐	Air Quality	☐	Hydrology/Water Quality	☐	Transportation
☒	Biological Resources	☐	Land Use/Planning	☒	Tribal Cultural Resources
☒	Cultural Resources	☐	Mineral Resources	☐	Utilities/Service System
☐	Energy	☐	Noise	☐	Wildfire
☐	Geology/Soils	☐	Population/Housing	☒	Mandatory Findings Significance

DETERMINATION: (To be completed by Lead Agency)

On the basis of this initial evaluation:

☐ The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ Although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ The proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (a) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (b) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but must analyze only the effects that remain to be addressed.

☐ Although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or (MITIGATED) NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or (MITIGATED) NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

EVALUATION OF ENVIRONMENTAL IMPACTS:

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact answer should be explained where it is based on project specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis.)

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses", as described in (5) below, may be cross-referenced).

5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or (mitigated) negative declaration. *Section 15063(c)(3)(D).* In this case, a brief discussion should identify the following:

    a. Earlier Analysis Used. Identify and state where they are available for review.

    b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c. Mitigation Measures. For effects that are "Less Than Significant With Mitigation Measures Incorporated", describe the mitigation measures that were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9) The explanation of each issue should identify:

    a. The significance criteria or threshold, if any, used to evaluate each question; and

    b. The mitigation measure identified, if any, to reduce the impact to less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS – Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐

Per the City of San Diego CEQA Significance Determination Thresholds (2022), projects that would block public views from designated open space areas, roads, or parks to significant visual landmarks and scenic vistas may result in a significant impact.

Replacement and rehabilitation of the existing pipeline and tunnel would not affect a scenic vista or damage scenic resources. The vast majority of the pipeline and appurtenances are located underground and within existing developed areas, and would continue to be located so such upon implementation of the project. The project would not entail permanent alteration of the visual character of the pipeline alignment. Aboveground facilities proposed would consist of small equipment housing along pipeline rights-of-way. These small facilities would not be highly visible. The project would be conditioned to meet the requirements to reduce potential visual impacts pursuant to the City of San Diego's Land Development Code (LDC) and the latest edition of the Standard Specifications For Public Works Construction ("Whitebook"). Thus, the project would not have a substantial adverse effect on a scenic vista.

b) Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐

See above. See also Section IV for discussion of biological resources (trees) and V for discussion of Cultural Resources, Built Environment on historic buildings. The project is located within 1 mile of State Route 52 and I-8, per the California Department of Transportation State Scenic Highway Statewide Scenic Highway map system; however, the project would not damage scenic resources (trees, rock outcroppings, or historic buildings). Impacts would be less than significant.

c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐

See I. a) and b). The project is located in both urbanized and non-urbanized areas. The project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings, nor would it conflict with applicable zoning or other regulations.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

The project would not emit any permanent source of light or glare. Construction activities would generally occur during permitted daylight hours between 7:00 a.m. and 7:00 p.m. Nighttime construction is not planned, but if necessary, would be temporary and in accordance with San Diego Municipal Code Section 59.5.0404. Therefore, impacts would be less than significant.

II. AGRICULTURAL AND FOREST RESOURCES: In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. – Would the project

a) Converts Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒

The majority of the Project is located within well-established communities that contain no potential for agricultural production. According to the California Department of Conservation's Farmland Mapping and Monitoring Program, the pipeline traverses land that is designated as Urban and Built Up Land, Grazing Land, and Other Land. No Prime Farmland, Unique Farmland, or Farmland of Statewide Importance exists within the project area. No impact would occur.

b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract?	☐	☐	☐	☒

The project would not conflict with existing zoning or Williamson Act contract.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 1220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒

The project would not conflict with or cause the rezoning of forest or timberland. No impact would occur.

d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☒	☐

See II. C) above. The project would not result in the loss of forest land as defined in the PRC or convert forest land to non-forest use. A limited amount of southern riparian forest habitat would be

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

impacted by the project as discussed under Section IV. Biological Resources; however, these impacts are fully mitigated by the restoration of wetland habitat in established mitigation banks at ratios equal to or greater than the lands impacted, such that no net loss of wetlands would occur.

e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

See I. a)-d) above. No impact would occur.

III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied on to make the following determinations – Would the project:

a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐

An Air Quality Technical Memorandum was prepared for the project, "El Monte Water Transmission Pipeline Rehabilitation – Air Quality Technical Memorandum" (Dudek, 2026). The SDAPCD and the San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plans for attainment and maintenance of the ambient air quality standards in the basin—specifically, the State Implementation Plan (SIP) and Regional Air Quality Strategy (RAQS). The federal O3 maintenance plan, which is part of the SIP, was adopted in 2012. The most recent O3 attainment plan 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 National Ambient Air Quality Standards (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 O3. 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 the County as a whole and the cities in the County, to project future emissions and determine 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.

If a project proposes development that is greater than that anticipated in the local plan and SANDAG's growth projections, the project might be in conflict with the SIP and RAQS and may contribute to a potentially significant cumulative impact on air quality. The project would not have any growth-inducing effects (housing, population, or employment) that would not be included within the SIP and RAQS.

While the SDAPCD and City do not provide guidance regarding the analysis of impacts associated with air quality plan conformance, the County's Guidelines for Determining Significance and Report and Format and Content Requirements – Air Quality, discuss conformance with the RAQS (County of San Diego 2007). The guidance indicates that if a project, in conjunction with other projects, contributes to growth projections that would not exceed SANDAG's growth projections for the City,

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

the project would not be in conflict with the RAQS (County of San Diego 2007). As previously discussed, the proposed project would not contribute to growth in the region that is not already accounted for. Therefore, a less than significant impact would result.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐

See I. a). Air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development, and 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 CalEEMod Version 2022.1.1.5 was used to estimate emissions from the construction of the project. As shown in the technical memorandum, project construction would not exceed SDAPCD's daily or annual thresholds. Operations would result in negligible emissions compared to construction. Impacts would be less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐

See I. a). Project construction would result in emissions of diesel particulate from heavy construction equipment and trucks accessing the site. Diesel particulate is characterized as a Toxic Air Contaminant (TAC) by the State of California. The project is nearly 10 miles long, and each individual rehabilitation project would occur in a discrete location on the pipeline. Each individual rehabilitation component would be temporary, lasting less than 2 months. Due to this relatively short period of exposure and minimal particulate emissions on-site, TACs generated by the project would not result in concentrations causing significant health risks. Overall, the project would not result in substantial TAC exposure to sensitive receptors in the vicinity of the project from construction activities, and impacts would be less than significant.

Per County of San Diego guidelines for conducting a hotspot analysis, during construction, projects that cause road intersections to operate at or below the level of service (LOS) E and the addition of peak-hour trips from a project and surrounding projects exceeds 3,000 have the potential to create CO concentrations exceeding the CAAQS. As shown in Section 3.3.1, the number of vehicles and trucks during construction is very minimal and would not cause an exceedance of the County's screening threshold. The project does not exceed the City of San Diego threshold for conducting a Local Mobility Analysis, as determined by the Transportation Study Manual (less than 500 average daily trips).

Construction of the proposed project would not result in emissions that exceed the SDAPCD's emission thresholds for any air pollutants criteria. Impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Odors would be potentially generated from vehicles and equipment exhaust emissions during the construction of the project. Potential odors produced during construction would be attributable to concentrations of unburned hydrocarbons from the tailpipes of construction equipment and asphalt pavement application. Such odors would disperse rapidly from the project site and generally occur at magnitudes that would not affect substantial numbers of people. Temporary construction equipment odors would be minimized through the implementation of standard construction practices and Whitebook standards (e.g., reduction of idling, dust abatement, and use of equipment compliant with modern standards). Therefore, impacts associated with odors during construction would be less than significant.

IV. BIOLOGICAL RESOURCES – Would the project:				
a) Have substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐

A Biological Technical Report (BTR) was prepared for the project by Dudek (2026). The report concludes the project would have potential for significant impacts to biological resources and proposes a mitigation monitoring and reporting program to mitigate effects to less than significant.

Direct impacts to special-status plant species could occur from ground disturbance and construction access. The project has the potential to directly impact one California Rare Plant Rank (CRPR) 1B.2 species observed at work location 439+20, decumbent goldenbush. In addition, the project has the potential to directly impact potentially suitable habitat for 10 other special-status species with a moderate potential to occur within the study area: San Diego goldenstar, thread-leaf brodiaea, and variegated dudleya (all MSCP-covered or narrow endemic), and California adolphia, California groundsel, Deane's milkvetch, knotweed spineflower, Munz's sage, and white-head cudweed (all CRPR 1B or 2B species). Impacts to these species would be considered significant, absent mitigation. Focused rare plant surveys will be conducted for these species during the appropriate blooming period prior to construction, and any individuals or populations will be marked and avoided per MM-BIO-3 (Focused Rare Plant Species Surveys).

Direct impacts to nesting birds, including two special-status wildlife species, the coastal California gnatcatcher and burrowing owl, could occur from project implementation. Nesting birds have the potential to occur at all work sites, including those entirely developed or disturbed. Impacts to nests, eggs, or nestlings could result from directly dislodging nests or by behavioral disturbance of adult birds that are caring for eggs or nestlings. To avoid such impacts, pre-construction nesting bird surveys and appropriate buffers would be implemented, in accordance with City and regulatory agency requirements. Coastal California gnatcatcher has a moderate to high potential to nest within coastal sage scrub habitat occurring within three work locations, 187+30, 267+37, and 439+20.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Burrowing owl has a high potential to nest and forage within open grassland habitat at two work locations, 322+52 and 335+83. Impacts to the coastal California gnatcatcher and burrowing owl nesting within the study area would be significant absent mitigation. Implementation of MM-BIO-1 and MM-BIO-2 will ensure minimization of disturbance to avian species, including the coastal California gnatcatcher, Bell's sparrow, and burrowing owl, during the nesting season.

The project would result in direct temporary impacts to 0.003 acres and direct permanent impacts to 0.001 acres of potentially suitable coastal California gnatcatcher and Bell's sparrow habitat. The project will also result in direct temporary impacts to 0.011 acres and direct permanent impacts to 0.003 acres of potentially suitable burrowing owl habitat. In both cases, direct permanent impacts are anticipated to be limited to existing infrastructure (i.e., the built environment), which would not be expected to support habitat for these species. Direct impacts to these land covers would require compliance with the LDC—Landscape Standards (City of San Diego 2016), which would require erosion control and return to pre-impact conditions for temporary impacts (See Section 2). Impacts to coastal California gnatcatcher, Bell's sparrow, and burrowing owl would be less than significant with implementation of project revegetation, and MM-BIO-1 (General Resource Protections), MM-BIO-2 (Burrowing Owl), MM-BIO-4A and 4B (Compensatory Habitat Mitigation), and MM-BIO-5 (Coastal California Gnatcatcher).

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐

Sensitive upland (Tier I-III) and wetland communities are protected by the City of San Diego Biology Guidelines and Multi Habitat Conservation Program. Direct impacts to sensitive habitats would result from activities such as clearing of the understory, selective grading, or excavation around the improvement sites and associated ground disturbance. The direct impacts to sensitive vegetation communities are summarized in Table 2 below.

Table 2. Direct Impacts to Vegetation Communities and Land Cover Types

Vegetation Community or Land Cover Type[1]	Temporary Impacts (Acres)	Permanent Impacts (Acres)	Mitigation Ratio[4]	Mitigation Required (Acres)
Sensitive Uplands (Tier)[2]				
Non-Native Grassland (IIIB)	0.089	0.011	0.5:1	0.050
Coastal Sage Scrub (II)	0.005	0.001	1:1	0.006
Sensitive Uplands Subtotal	*0.094*	*0.012*		*0.056*
Other Uplands				
Developed (IV)	0.710	0.051	-	-
Disturbed Habitat (IV)	0.345	0.067	-	-
Non-Native Woodland (IV)	0.032	0.011	-	-
Other Uplands Subtotal	*1.087*	*0.129*	-	-
Wetlands				

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Vegetation Community or Land Cover Type[1]	Temporary Impacts (Acres)	Permanent Impacts (Acres)	Mitigation Ratio[4]	Mitigation Required (Acres)
Non-native Riparian	0.002	<0.001	-	-
Emergent Wetland	0.003	-	2:1	0.006
Southern Riparian Forest	0.002	0.023	3:1	0.075
Wetlands Subtotal	*0.007*	*0.023*		*0.081*
Total[3]	**1.188**	**0.164**		

Notes:

1 Oberbauer et al. 2008.
2 City of San Diego 2018.
3 Some numbers may not sum due to rounding.
4 Impacts located outside of MHPA, mitigation located within the MHPA
5 Compensatory mitigation not required for impacts to non-native riparian

To compensate for the loss of 0.106 acres of coastal sage scrub and non-native grassland habitats located outside of the MHPA, mitigation would be provided through allocation of credits from the Marron Valley Cornerstone Land Bank, which occurs inside the MHPA. Payment and credit allocation shall be provided for a total of 0.056 acres to achieve the required mitigation ratios prior to the start of construction. The City of San Diego Engineering and Capital Projects Department (ECP) shall be required to contribute the estimated average per-acre land cost, multiplied by the mitigation ratio, plus any required amount for administration. The ED shall be provided with evidence of credit deduction prior to construction.

Direct impacts to potentially jurisdictional aquatic resources, including City of San Diego (City) wetlands, would require mitigation to comply with City, state, and/or federal authorizations, in accordance with the City's Biology Guidelines. Impacts to 0.030 acres of City wetlands (including potentially jurisdictional aquatic resources) shall be mitigated through the purchase of 0.081 acres of credits at the Stadium Wetland Mitigation Site. The ED shall be provided with evidence of credit deduction prior to construction. With mitigation incorporated (MM-BIO-4A and MM-Bio 4B, Compensatory Habitat Mitigation), impacts would be less than significant.

c) Have a substantial adverse effect on federally protected wetlands (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐

See IV. b) above. Impacts would be less than significant with mitigation incorporated.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

The project is limited to existing infrastructure and will not result in any new construction that would adversely affect wildlife corridor functions within and adjacent to the work locations. The eastern portion of the study area is located within the County of San Diego's MSCP Lake Jennings/Wildcat Canyon-El Cajon Mountain Core BLA. However, the work locations are entirely developed or disturbed and would not impact the native habitat within the BLA. In general, the study area is located within a matrix of surrounding urban development, infrastructure, and roadways, and impacts would be limited to existing infrastructure within work locations. The project may result in the temporary, short-term interference with wildlife movement between areas of more suitable habitat off-site, but would not result in any long-term barriers to regional wildlife movement. The project is not anticipated to disrupt the integrity or continuity of an adjacent, off-site important habitat. Therefore, direct impacts to wildlife corridors are less than significant. Similarly, indirect effects (e.g., edge effects) are expected to be minimized through the implementation of MM-BIO-1. As discussed in Section 5 of the BTR, the project is consistent with the MSCP. As such, the project would have no indirect impact to wildlife corridors or habitat linkages.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐

The project would not conflict with the MSCP, City of San Diego Land Development Manual, or the Biology Guidelines. The Project has been designed to protect existing trees as much as possible. Tree or vegetation removal is intended to be limited to only those within the work limits or necessary for contractor access for construction. Work within the City's jurisdiction would comply with Council Policy 900-19, "Public Tree Protection." Impacts would be less than significant.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☒	☐

See IV. e) above. Impacts would be less than significant.

V. CULTURAL RESOURCES – Would the project:

a) Cause a substantial adverse change in the significance of an historical resource as defined in §15064.5?	☐	☒	☐	☐

The purpose and intent of the Historical Resources Regulations of the Land Development Code (Chapter 14, Division 3, and Article 2) is to protect, preserve, and, where damaged, restore the historical resources of San Diego. The regulations apply to all proposed development within the City of San Diego when historical resources are present on the premises. Before approving discretionary projects, CEQA requires the Lead Agency to identify and examine the significant adverse environmental effects that may result from that project. A project that may cause a substantial adverse change in the significance of a historical resource may have a significant effect on the environment (sections 15064.5(b) and 21084.1). A substantial adverse change is defined as demolition, destruction, relocation, or alteration activities, which would impair historical significance (sections 15064.5(b)(1)). Any historical resource listed in, or eligible to be listed in the California Register of Historical Resources, including archaeological resources, is considered to be historically or culturally significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

A Historic Resources Report was completed for the project, "Historic Property Identification Report for the El Monte Water Transmission Pipeline Rehabilitation Project (H197037), San Diego County, California" (Kleinfelder, 2026). The report analyzes built environment and historical resources within the Area of Potential Effect (APE).

Built Environment

No above ground historic period buildings or structures are within the APE. The El Monte Pipeline was documented as potential built environment resource because it is over 50 years of age and therefore meets the age threshold for consideration as a potential historic property. It represents a key asset to the delivery of raw water from the El Capitan and San Vicente reservoirs and the San Diego County Water Authority's (SDCWA) First Aqueduct to the Alvarado Water Treatment Plant (AWTP). The El Monte Pipeline is a potentially eligible historic built environment resource for purposes of CEQA and NHPA review. The proposed project would not result in the demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that its significance would be materially impaired. The report recommends a finding of no adverse effects to historic properties for the project under NHPA Section 106. Potential impacts to historic built environment resources under CEQA would be less than significant.

Cultural Resources

The cultural resources inventory for the El Monte Water Transmission Pipeline Rehabilitation Project included a records search of the SCIC, review of historical maps and aerial imagery, and an SLF search conducted by the NAHC. Native American outreach and coordination were conducted with tribes identified by the NAHC. An intensive pedestrian survey was also completed, covering 100 percent of the accessible ground surface within the APE.

The APE is heavily disturbed by historic residential construction of the property, past historic-era construction of pipelines, and maintenance. The majority of the APE consists of asphalt roadways, concrete surfaces or structures (sidewalks, curbs, and/or concrete encasements) and/or within modernized and maintained landscaped areas. No ground-disturbing work is proposed within areas previously undisturbed. In sum, the entire APE is heavily disturbed from historic period construction; residential development, infrastructure (highway, roads, utilities), landscape, and maintenance. Visibility was good for all areas subject to ground disturbance within the APE. The survey resulted in negative findings for cultural resources.

Based on the results of background research, tribal coordination, field survey, and the extent of prior disturbance, the potential for intact archaeological or tribal cultural resources within the APE is considered low. However, ground-disturbing activities present a limited potential for inadvertent discovery of previously unidentified subsurface cultural materials. Cultural resources monitoring is recommended as a mitigation measure, including archaeological and Native American monitoring during ground-disturbing activities that may expose subsurface soils (MM-HIST-1: Construction Monitoring). In addition, the City of San Diego Whitebook (2021), Section 6-6.2, shall be implemented in the event of an inadvertent discovery. With implementation of these measures, impacts to archaeological resources and tribal cultural resources would be reduced to less than significant.

b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

See V. a) above. Impacts would be less than significant with mitigation incorporated.

c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

See V. a) above. In the event that human remains are discovered, the County Coroner shall be contacted. If the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the Native American Heritage Commission, shall be contacted in order to determine proper treatment and disposition of the remains. All requirements of Health & Safety Code §7050.5 and PRC §5097.98 shall be followed. Impacts would be less than significant with mitigation incorporated.

VI. ENERGY – Would the project:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐

The project includes rehabilitation and replacement of the water pipeline and appurtenances. Energy used for construction would primarily consist of fuels in the form of diesel and gasoline for the operation of mechanical equipment and worker vehicles. While activities would consume petroleum-based fuels, consumption of such resources would be temporary and would cease upon construction. Maintenance needs would be reduced by the replacement and rehabilitation of the El Monte Pipeline infrastructure. Petroleum consumed during these activities would be typical of similar construction projects and would not require the use of new petroleum resources beyond what are typically consumed in California. The project would be required to meet the mandatory energy standards of the current California energy code. Based on these considerations, the project would not result in wasteful, inefficient, or unnecessary consumption of energy resources. Impacts would be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

The project is required to comply with the City's Climate Action Plan (CAP), which is demonstrated through the CAP Memo prepared for the project (City of San Diego, 2026). Therefore, the project would not obstruct a state or local plan for renewable energy or energy efficiency.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII. GEOLOGY AND SOILS – Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐

A Geotechnical Investigation was prepared for the project, "Geologic Study and Geotechnical Engineering Report Design of El Monte Water Transmission Pipeline Rehabilitation" (Kleinfelder 2025). The overall project site, like most of Southern California, is located in a seismically active area and is likely to experience ground shaking as a result of earthquakes on nearby or more distant faults. Seismic design parameters were developed consistent with the requirements of the California Building Code (CBC), ASCE/SEI 7-16, and Supplements 1 through 3 of that standard.

Review of readily available geologic and fault maps does not show any active or potentially active fault features passing through or nearby any of the sites. An active fault is one that has undergone displacement within the last approximately 11,000 years. A potentially active fault (aka: Pre-Holocene fault) is one in which movement had occurred at some time between 1.6 million years and 11,000 years before present. The site is not located within an Alquist-Priolo Earthquake Fault Zone. Work would primarily take place in previously excavated rock. Areas of slightly weathered granitic rock may require specialized construction equipment (e.g., rock breakers). Based on this information, the hazard associated with fault rupture is considered negligible.

ii) Strong seismic ground shaking?	☐	☐	☒	☐

See VII. a) i). Impacts would be less than significant.

iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐

See VII. a) i). Differential seismic settlement occurs when seismic shaking causes one type of soil to settle more than another type. It may also occur within a soil deposit with largely homogeneous properties if the seismic shaking is uneven due to variable geometry or thickness of the soil deposit. Based on the Geotechnical Investigation, there is a low potential of seismic-induced settlement in mechanically placed fill materials along the project alignment.

The term liquefaction describes a phenomenon in which saturated, cohesionless soils temporarily lose shear strength (liquefy) due to increased pore water pressures induced by strong, cyclic ground motions during an earthquake. Structures founded on or above potentially liquefiable soils may experience bearing capacity failures due to the temporary loss of foundation support, vertical settlements (both total and differential), and may undergo lateral spreading. The factors known to influence liquefaction potential include soil type, relative density, grain size, confinement, depth to

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

groundwater, and the intensity and duration of the seismic ground shaking. Liquefaction is most prevalent in loose to medium dense, sandy and gravely soils below the groundwater table, but can also occur in non-plastic to low plasticity fine-grained soil.

Due to the potential of relatively loose to medium dense recent alluvial soils and near-surface groundwater below most of the northern terrain, the risk of liquefaction during an earthquake event would be considered moderate to high. Most of the project would be in existing developed locations. Structural fill materials would not lead to greater risk of liquefaction or landslide during seismic events as a result of project construction. Impacts would be less than significant.

iv) Landslides?	☐	☐	☒	☐

See VII. a) i-iii). Much of the northern, north-central and south-central terrain areas of the EMPL cross through relatively flat-lying topography. The north-central segment crosses through two moderate hillslope areas which are composed of granitic rock. It is our opinion that the potential for landsliding or slope instability in these areas would be relatively low to moderate. The northern and south-central terrain areas do not have any notable sloping topography, and the potential for landsliding is considered low. The southern terrain crosses into moderately sloping hillside areas comprised of Eocene-age sedimentary material. One of these units, the Friars Formation on the eastern side of this segment, is notorious for instability on moderate to steeply sloping ground surfaces. There are both structures and the tunnel section portal in this area. The potential for slope instability in this area would be considered moderate to high. However, structural fill materials would not lead to a greater risk of liquefaction or landslide during seismic events as a result of project construction.

The remainder of the alignment through this southern terrain is comprised mostly of conglomerate and sandstone of the Pomerado Conglomerate, Stadium Conglomerate and Mission Valley Formation. These units are typically considered relatively stable in regard to landsliding on moderate to steeply sloping surfaces, and it is our opinion that the landsliding hazard is considered low.

b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

See VII. a) i). The project would be subject to Municipal Code and Whitebook requirements to revegetate all temporary impact areas for the purpose of erosion control. Additionally, the project would adhere to state and local storm water regulations and implement erosion and sediment control BMPs. Therefore, impacts would be less than significant.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐

The project alignment is underlain by competent geologic units, which are not considered susceptible to seismic-induced lateral spreading. The Sweetwater River valley is underlain by poorly consolidated soil materials, but the valley floor is relatively flat; therefore, it is our opinion that the risk of lateral spread displacement during a seismic event is considered remote.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Based on the anticipated excavation depths, shoring will be necessary to reduce the potential for the caving of proposed excavations. However, the proposed work would rehabilitate the pipeline itself, and ground disturbance would be located away from any structures. The project would be designed such that potential effects on adjacent structures, existing utilities and pipes to remain in place and other existing site improvements are minimized.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐

Eleven sites were identified for the geotechnical field investigation. Of these sites, Sites 1, 7, and 10 are likely to encounter dense alluvial materials at the proposed bearing subgrade elevations. These sites are located at Magnolia Ave & Kenney St, Julian Ave, and Woodside Ave & Shadow Hill Rd. These materials are considered suitable for the support of proposed foundations; however, they are generally made up of clayey sands. Should high plasticity clays be encountered at the foundation subgrade, these materials may damage foundations due to the potential for expansion and should be removed and replaced with compacted, granular structural fill.

Prior to placing any fill for over-excavated foundation subgrades, the exposed subgrade materials are recommended to be scarified to a depth of at least 8 inches, moisture conditioned, and compacted. Any expansive soils observed within the upper three feet of finished subgrade within the proposed structure should be removed and replaced with non-expansive soils and compacted. Backfill material above the bedding zone may consist of on-site or imported soils. If on-site soils are used, these soils would require moisture conditioning and possibly segregation of oversize materials and potentially expansive clayey soils. With these geotechnical recommendations implemented, the potential for impacts would be less than significant.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☒	☐

The project would not involve the installation of septic tanks or alternative wastewater disposal systems. For segments of the project that include dewatering, appropriate permits would be secured by the project contractor pursuant to Whitebook Section 3-12.8 Dewatering, which specifies permitting and dewatering plan requirements. Impacts would be less than significant.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

The City's Significance Determination Thresholds state paleontological monitoring during grading activities is required if the project's grading exceeds 1,000 cubic yards and ten feet deep for high sensitivity formations, or 2,000 cubic yards and ten feet deep for moderate sensitivity formations. Monitoring is always required when grading on a fossil recovery site or near a fossil recovery site in the same geologic deposit.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Earthwork to be performed will include general excavation at selected locations along the pipeline alignment, ranging from approximately 5 to 20 feet in depth. Per the Geotechnical Investigation prepared, the project is underlain by Alluvium, Friars Formation, Artificial Fill, Stadium Conglomerate, and Decomposed Granite. Friars Formation and Stadium Conglomerate have a high sensitivity for paleontological resources. Based on the project scope, it is presumed excavation would exceed 1,000 cubic yards. Therefore, paleontological monitoring will be required during construction in accordance with the City's General Grading Guidelines for Paleontological Resources. With monitoring incorporated, impacts would be less than significant. No mitigation would be required.

VIII. GREENHOUSE GAS EMISSIONS – Would the project:

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

The project is required to comply with the City's Climate Action Plan (CAP), which is demonstrated through the CAP Memo prepared for the project (City of San Diego, 2026). Therefore, the project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

See VI. a) and b) and XIII. a). No conflict with the Climate Action Plan would occur.

IX. HAZARDS AND HAZARDOUS MATERIALS – Would the project:

a) Create a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐

The project was reviewed by staff from Environmental Services Department, and determined to have a low potential for encountering petroleum during construction. Standard bid items under the City's Whitebook, Section 5-15, would be followed to address the potential of encountering hazardous substances at the Work Site. The Whitebook includes conditions to coordinate with City and County staff in the event of encountering hazardous waste. A Community Health and Safety Plan (CHSP) would address items such as odors, dust, and stockpiles.

Once operational, the pipeline project would not require the routine transport, use, or disposal of hazardous materials. Compliance with applicable federal, state, and local standards regarding the use of such materials would prevent unsafe conditions and any resultant adverse environmental effects. Thus, potential impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐

During construction, the project would adhere to Whitebook Standards, including the (CHSP), to address the potential of encountering hazardous substances at the Work Site; see IX a) above. Ongoing maintenance work would be required to comply with all required City and OSHA safety trainings. Through compliance with contract measures and safety regulations, the potential for impact would remain less than significant.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐

Work would occur in minor project footprints along dozens of locations along the El Monte Pipeline, in primarily developed areas. While several schools are located within a quarter mile of the pipeline, through the implementation of the measures listed in IX. a) and b) above, impacts would be less than significant.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐

No properties within the project area are included in a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☒	☐

The project proposes work at the following station locations:

322+52	Rehabilitate the vault, manway, and blowoff	Grass field adjacent to Gillespie Field airport. Land covers include non-native grassland and developed.
335+83	Excavate and abandon the manway	Grass field adjacent to Gillespie Field airport. Land cover is non-native grassland.

The project is located within the boundary of the Gillespie Field Airport Land Use Compatibility Plan (ALUCP) (2010). Per SDMC 132.1505(c)(1), the project proposes repairs to an existing underground

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

water pipeline that will not increase the intensity, density, floor area ratio or height of an existing structure. Therefore, the project is exempt from the requirements of the ALUCP for Gillespie Field. Therefore, the project would not result in a safety hazard or excessive noise.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

Requisite work within roadways would not entail the complete closure of the affected streets; therefore, the project would not interfere with emergency response or emergency evacuation plans in these areas. Additionally, a Traffic Control Plan would be secured as needed for work within the right-of-way. Impacts would be less than significant.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☒	☐

See Section XX, Wildfire. Impacts would be less than significant.

X. HYDROLOGY AND WATER QUALITY - Would the project:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐

The project would not be subject to California's statewide General National Pollutant Discharge Elimination System (NPDES) permit for Stormwater Discharges Associated with Construction Activities, also known as the State Construction General Permit (CGP). In accordance with the City's Storm Water regulations and the Whitebook, a Water Pollution Control Plan (WPCP) would be prepared by the construction contractor. The project consists of rehabilitation and replacement of underground utilities and does not create new impervious surfaces; thus, the project is not subject to permanent storm water BMP requirements. Impacts to water quality would be less than significant.

b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐

Standard techniques for dewatering, as outlined in the contract documents, would be used when necessary to control groundwater levels and hydrostatic pressures during excavation and construction. If groundwater is encountered and dewatering is required, then the groundwater would be disposed of by pumping to the sanitary sewer system or discharging to the storm drain system according to the conditions of the appropriate NPDES or sewer permit. Generally, work would be scheduled to minimize the cost and duration of dewatering activities. The project is not presumed to substantially deplete groundwater supplies.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Surface water could potentially be contaminated during the construction process from mishandling of fuel or other hazardous materials, or from erosion and sediment runoff as a result of construction activities such as trenching, excavation, and spoils stockpiling. Implementation of a WPCP, including the use of BMPs, would be required during construction. Potential impacts would be less than significant.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:

i) result in substantial erosion or siltation on- or off-site; ☐ ☐ ☒ ☐

With implementation of the WPCP and appropriate BMPs, construction activities (trenching, excavation, and spoils stockpiling) would not result in significant erosion and sediment runoff impacts, and short-term hydrology/water quality impacts would be avoided. The project is not subject to permanent storm water BMP requirements. Additionally, the facilities associated with the proposed project would be predominantly underground and within existing developed areas. Potential impacts would be less than significant.

ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site; ☐ ☐ ☒ ☐

See X a-c) i) above. Impacts would be less than significant.

iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or ☐ ☐ ☒ ☐

The project would not require the use of substantial amounts of surface runoff. A limited amount of water would be utilized during the project's revegetation; however, the project would be limited to the replacement of existing landscaping and planting, and hydroseeding with coastal sage scrub and native grassland plant palettes. Additionally, the project is limited to rehabilitation and replacement of existing underground pipeline and related appurtenances, which would improve reliability of the transmission of raw water and would not require new impermeable surfaces. The potential for additional sources of polluted runoff is less than significant.

iv) impede or redirect flood flows? ☐ ☐ ☒ ☐

The flood hazard potential at the site was evaluated based on flood hazard maps available through the FEMA Map Service Center Web site (FEMA Flood Map Service Center, 2023). Based on FEMA

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Maps, all work sites are located within Zone X, corresponding to an area of minimal flood hazard. As a result, no significant long-term hydrology/water quality or flooding impacts are anticipated with the implementation of the project.

The proposed Project would involve replacement of existing pipelines and appurtenances predominantly within existing roadways and developed footprints and would not involve above-ground facilities that would significantly affect long-term drainage characteristics.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐

See X a-c) above. Impacts would be less than significant.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

See X a-c above. Replacement and or construction of new pipeline would involve temporary minor alteration of existing topography through excavation and trenching techniques; however, the majority of work would be in developed footprints where standard stormwater quality measures would be implemented. Impacts would be less than significant.

XI. LAND USE AND PLANNING – Would the project:

a) Physically divide an established community?	☐	☐	☒	☐

The project is limited to pipeline improvements, which would not result in the construction of any above-ground structures that would physically divide an established community. Impacts to traffic and circulation would be temporary, and a Traffic Control Plan would be implemented during construction, as discussed in Section XVII, Transportation and Circulation. Impacts would be less than significant.

b) Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

The project would comply with the general goals of the San Diego General Plan, Public Facilities, Services, and Safety Element. These goals call for a safe, reliable, and cost-effective water supply for San Diego, and a water supply infrastructure that provides for the efficient and sustainable distribution of water.

The respective General Plan documents for the County of San Diego and cities of El Cajon, La Mesa, and Santee do not specifically discuss maintenance or improvement of utility lines that are under the jurisdiction of another agency. However, there is no other language in these documents that

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

would preclude project implementation. The project is consistent with the Lakeside Community Plan (County of San Diego) policies and recommendations: protect the public health and safety by requiring public agencies and utilities to adhere to air, water, noise, and visual pollution standards; and require public agencies to landscape all of their facilities. The project is consistent with the City of El Cajon General Plan objective that the development of property shall be coordinated with efforts at conservation of natural resources. The project is consistent with the City of La Mesa General Plan objective to achieve sustainable levels of water supply and quality in support of local and Regional needs. The project is consistent with the City of Santee policies to require that all development proposals provide appropriate mitigation for identified significant biological resources including selective preservation, sensitive site planning techniques and in-kind mitigation for identified impacts, and require either the preservation of significant historic or prehistoric sites, or the professional retrieval of artifacts prior to the development of a site, consistent with the provisions of the California Environmental Quality Act.

Implementation of the Project in conjunction with the relevant MSCP Subarea Plans would not contribute to significant cumulative land use impacts. The MSCP Subarea Plans identify areas to be preserved for biological habitat and generally ensure the protection of biologically sensitive resources. The project would utilize the take permit authority of the City of San Diego MSCP.

Compliance with the City of San Diego MSCP, as well as all relevant General Plans and Community Plans, would ensure the project does not cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation.

XII. MINERAL RESOURCES – Would the project:

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☒	☐

Per the City's Significance Thresholds, the project could cause a potentially significant impact to mineral resources if it resulted in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. In accordance with guidelines established by the State Mining and Geology Board, mineral deposits in western San Diego County have been classified into Mineral Resources Zones (MRZs).

According to the Generalized Mineral Land Classification Map of Western San Diego County, California (Miller, 1996), the project is primarily located on MRZ-3, areas containing mineral deposits the significance of which cannot be evaluated from available data. The individual footprints of each project site would be too small for economically feasible mineral resource extraction. The proposed pipeline improvements would not preclude mining adjacent to or surrounding the site. Therefore, impacts would be less than significant.

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☒	☐

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

See XII. a. Impacts would be less than significant.

XIII. NOISE – Would the project result in:

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐

Noise is defined as unwanted or objectionable sound. Noise levels compatible with a person's life, health and enjoyment of property are regulated by Local, State, and Federal regulations, including the City of San Diego General Plan, City Noise Abatement and Control Ordinance, California Noise Insulation Standards (Title 24), the State Public Utilities Code regulating airports, and other regulations. A direct and/or indirect noise impact should be evaluated in relation to applicable City standards, particularly the City of San Diego General Plan Noise Element, Land Use - Noise Compatibility Guidelines. The following significance thresholds are in accordance with the City of San Diego California Environmental Quality Act Significance Determination Thresholds (revised 2022).

Interior and Exterior Noise Impacts from Traffic Generated Noise (Table K-2 below provides the general thresholds of significance for uses affected by traffic noise.)

Table K-2
TRAFFIC NOISE SIGNIFICANCE THRESHOLDS
(db(A) CNEL)

Structure or Proposed Use that would be impacted by Traffic Noise	Interior Space	Exterior Useable Space [22]	General Indication of Potential Significance
Single-family detached	45 dB	65 Db	Structure or outdoor useable area[23] is < 50 feet from the center of the closest (outside) lane on a street with existing or future ADTs > 7500 [24]
Multi-family, schools, libraries, hospitals, day care, hotels, motels, parks, convalescent homes.	- Development Services Department (DSD) ensures 45 dB pursuant to Title 24	65 dB	
Offices, Churches, Business, Professional Uses	n/a	70 dB	Structure or outdoor usable area is < 50 feet from the center of the closest lane on a street with existing or future ADTs > 20,000
Commercial, Retail, Industrial, Outdoor Spectator Sports Uses	n/a	75 dB	Structure or outdoor usable area is < 50 feet from the center of the closest lane on a street with existing or future ADTs > 40,000

Source: 1) City of San Diego Acoustical Report Guidelines (December 2003) and 2) City of San Diego Progress Guide and General Plan (Transportation Element)

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

Based on the Transportation Study Manual, the project would not generate a significant number of vehicle trips. Additionally, no structures or proposed uses would be constructed that would be impacted by surrounding traffic noise. Based on these estimates, no significant impact with respect to traffic-generated noise would occur.

A project that generates noise levels at the property line, which exceed the City's Noise Ordinance Standards, is considered potentially significant (e.g. a carwash or projects operating generators and/or noisy equipment). The project does not propose the construction of any noise-generating features, as the proposed water pipeline would be located underground.

Noise mitigation may be required for significant noise impacts to certain avian species during their breeding season, depending upon the location of the project such as in or adjacent to an MHPA, whether or not the project is occupied by the California gnatcatcher, least Bell's vireo, southern willow flycatcher, least tern, cactus wren, tricolored blackbird or western snowy plover, and whether or not noise levels from the project, including construction during the breeding season of these species would exceed 60dB(A) or existing ambient noise level if above 60dB(A). See IV, Biological Resources, for this discussion.

Temporary construction noise that exceeds 75 dB (A) Leq at a sensitive receptor would be considered significant. Additionally, where temporary construction noise would substantially interfere with normal business communication or affect sensitive receptors, a significant noise impact may be identified. In conformance with San Diego Municipal Code (SDMC) Section 59.5.0404, construction noise levels measured at or beyond residential property shall not exceed an average sound level greater than 75 decibles (dB) from 7:00 a.m. to 7:00 p.m. In addition, construction activity is prohibited between 7:00 p.m. of any day and 7:00 a.m. of the following day, or on legal holidays as specified in SCMC Section 21.04, with the exception of Columbus Day and Washington's Birthday, or on Sundays, that would create disturbing, excessive, or offensive noise unless a permit has been applied for and granted by the Noise Abatement and Control Administrator. The permit prescribes conditions, working hours, types of construction equipment to be used, and permissible noise levels deemed to be required in the public interest. The project would also be required to adhere to the Whitebook, which requires a pre-construction meeting; education on seasonal noise restrictions; noise barriers related to nesting; and a public notification program with contact of the site safety manager. Additionally, the project would be subject to County of San Diego Code Section 36.408 Hours of Operation of Construction Equipment and 36.409, Sound Level Limitations on Construction Equipment. Compliance with these measures would ensure impacts would remain less than significant.

Noise is one factor to be considered in determining whether a land use is compatible. No change in land use is proposed, so no associated impact would occur.

Through compliance with the Whitebook, City of San Diego Noise Abatement and Control Ordinance, and County of San Diego Code, potential for impacts would be less than significant.

b)	Generation of, excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

The project would not result in the construction of any features that would generate vibration during operation. During project construction, standard trenching equipment would be used that would not generate significant vibration. Construction methods that would generate significant vibration, such as blasting or pile driving, are not proposed.

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

See IX. e). Impacts would be less than significant.

XIV. POPULATION AND HOUSING – Would the project:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐

See XI. LAND USE AND PLANNING. The project would improve reliability and increase distribution capacity in portions of the existing El Monte Pipeline, but these improvements would not represent an extension of infrastructure nor induce growth in any of the served communities that are already built out. The increased efficiency of the El Monte Pipeline would ensure that potable water is available to all existing and planned consumers within the service area.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

The project would not require the displacement of any existing people or housing.

XV. PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provisions of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service rations, response times, or other performance objectives for any of the public services:

i) Fire protection;	☐	☐	☒	☐
ii) Police protection;	☐	☐	☒	☐
iii) Schools;	☐	☐	☒	☐

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
iv) Parks;	☐	☐	☒	☐
v) Other public facilities?	☐	☐	☒	☐

The project would have no temporary or permanent impact on fire protection, emergency response, police protection or school services within the various jurisdictions traversed by the pipeline, and the project would not interfere with emergency response or emergency evacuation plans in any area. The project does not propose the development of new housing or employment uses that would accommodate population growth or necessitate the provision of additional public services.

The project would not place additional demand on fire or police services, schools, parks, or other public facilities. The project would not result in any significant or permanent impacts to parks or recreation services. Therefore, impacts would be less than significant.

XVI. RECREATION

a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐

The project would not result in increased population, as described in XIV(a). The project is limited to pipeline and tunnel rehabilitation and repair, and would not affect the use of parks or recreational facilities. The project is not anticipated to result in changes to the use of existing parks or recreational facilities, and substantial deterioration of these facilities would not be accelerated.

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☐	☒

The project does not include recreational facilities or require the construction or expansion of recreational facilities. No impact would occur.

XVII. TRANSPORTATION–

a) Would the project or plan/policy conflict with an adopted program, plan, ordinance or policy addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities?	☐	☐	☒	☐

The project involves work that may affect right-of-way within the City of San Diego, County of San Diego, Santee, El Cajon, and La Mesa during construction. The project will involve work pertaining to temporary parking space reduction, on the street or in parking lots. However, the temporary use of construction vehicles within and outside of the City would be limited to small individual footprints

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

that would not significantly impact circulation, which could result in a conflict with any adopted program or plan addressing the transportation system, and a Traffic Control Plan would be implemented during construction. Impacts would be less than significant.

b) Would the project or plan/policy result in VMT exceeding thresholds identified in the City of San Diego Transportation Study Manual?	☐	☐	☒	☐

Based on the VMT screening criteria identified in the City of San Diego's Transportation Study Manual (TSM), the proposed Project would qualify as a Locally Serving Public Facility, which is defined as a public facility that serves the surrounding community or a public facility that is a passive use. Passive public uses include communication and utility buildings, water, sanitation, and waste management per the TSM. Therefore, the potential for VMT impacts from the proposed is presumed to be less than significant .

c) Would the project or plan/policy substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐

The project is the replacement of an underground pipeline and would have minimal features above ground after construction. The features would not substantially increase any hazards as a result of modified transportation design features (e.g., sharp curves or dangerous intersections). No change in designated use is proposed, and impacts would be less than significant.

d) Result in inadequate emergency access?	☐	☐	☒	☐

See IX. (f). Impacts would be less than significant.

XVIII. TRIBAL CULTURAL RESOURCES – 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, 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	☐	☒	☐	☐

See section V. a). Impacts would be less than significant with mitigation incorporated.

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	☐	☒	☐	☐

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				

See section V. a). Impacts would be less than significant with mitigation incorporated.

XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which would cause significant environmental effects?	☐	☐	☒	☐

The project proposes rehabilitation and improvements to the El Monte Pipeline, a critical raw-water transmission facility, which delivers water from San Vicente and El Capitan Reservoirs and the San Diego County Water Authority's first aqueduct to the Alvarado Water Treatment Plant. The project is intended to improve existing water distribution facilities of the City of San Diego, and thereby enhance the service provided to City of San Diego residents. The purpose of the rehabilitation is to extend the pipeline's service life, enhance operational efficiency, and improve reliability, and would not require or result in new or expanded utilities. The Project would have no adverse effect on the water distribution, wastewater, or storm water drainage systems of the City of San Diego or any other jurisdictions along the project alignment.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐

See XIX a) above. The project is limited to pipeline and tunnel rehabilitation and replacement and would not construct any residential, commercial, or other development that would require additional water supply. The project would benefit the local water supply, creating more reliable raw water distribution. Sufficient water supplies are available for project-required revegetation maintenance. Impacts would be less than significant.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's demand in addition to the provider's existing commitments?	☐	☐	☐	☒

The project is limited to pipeline and tunnel rehabilitation and replacement and would not construct any residential, commercial, or other uses that would require expanded wastewater treatment capacity. Therefore, the project would not exceed existing wastewater treatment capacity.

d) Generate solid waste in excess of State or local standards, or in excess of the	☐	☐	☒	☐

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?				

Construction debris and waste would be generated from the construction of the project. All construction waste from the project site would be transported to an appropriate facility, which would have adequate capacity to accept the limited amount of waste that would be generated by the project. The project would be required to adhere to Section 5-14 of the Whitebook, 5-14 Construction and Demolition Waste Management. The Whitebook specifies construction and demolition waste reduction in compliance with Municipal Code §§66.0601–66.0610 (the City's Construction and Demolition Debris Diversion Deposit Program) and the City of San Diego's California Environmental Quality Act (CEQA) Significance Determination Thresholds. Adherence to the specifications contained in Section 5-14 is intended to ensure compliance with both the City's Municipal Code and CEQA. During the construction phase of projects, the minimum waste management reduction goal is 90% of the inert material (a material not subject to decomposition, such as concrete, asphalt, brick, rock, block, dirt, metal, glass, etc.) and 65% of the remaining project waste. A Waste Management Form would be provided as evidence of recycling and reuse of materials to meet the waste reduction goals specified.

Long-term solid waste generated by the project would be negligible. Furthermore, the project would be required to comply with the City's Municipal Code for diversion of both construction waste during the demolition phase and solid waste during the long-term, operational phase. Therefore, the project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, and impacts would be less than significant.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

See XIX. d). The project would comply with applicable federal, state, and local management and reduction statutes and regulations related to solid waste.

XX. WILDFIRE – If located in or near state responsibility area or lands classified as very high fire hazard severity zones, would the project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

The project would not substantially impair an adopted emergency response plan or emergency evacuation plan. The 2023 San Diego County Multi-Jurisdictional Hazard Mitigation Plan (SDHMP) is the San Diego region's plan toward greater disaster resilience in accordance with section 322 of the Disaster Mitigation Act of 2000. The project would not conflict with the goals, objectives, and actions of the SDHMP. Per Action 1.D.6, High Fire Hazard areas shall have adequate access for emergency vehicles. The project would not alter the existing circulation network. As described in Section XVII. d), project construction and operation would include periodic use of construction vehicles and light trucks. Daily vehicle trips generated during project implementation would not result in traffic congestion that could impede emergency response or evacuation.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

The project would also be consistent with the latest edition of the California Fire Code, Chapter 33 Fire Safety During Construction and Demolition. Furthermore, the project would not construct any habitable structures that would require emergency response or evacuation. Therefore, impacts would be less than significant.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of wildfire?	☐	☐	☒	☐

The project site is in an area identified as within the Very High Fire Hazard Severity Zone. However, individual project locations are within primarily developed areas and include replacement in place and internal condition assessments and repairs. Open trench work would be limited to developed right-of-way. The project is limited to pipeline and tunnel rehabilitation and replacement. During and after construction, the project would include appropriate revegetation and erosion control measures and thus would not exacerbate existing wildfire risks. Slope, prevailing winds, and other factors would not be affected, which could expose the project to exacerbated wildfire risks. Impacts would be less than significant.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐

Impacts from the installation of all required infrastructure and further discussion of fire risk are discussed in Section IV, Biological Resources and XX Wildfire a) and b) above. Once completed, the project would consist of appropriate connections and appurtenances to emergency water infrastructure. Therefore, the potential for impact would be less than significant.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

The project is limited to pipeline and tunnel rehabilitation and replacement and would not introduce any residential, commercial, or other uses that could expose people to fire risk. As described in VII. a) iv), the project would not exacerbate the risk associated with landslides. Therefore, the project would not result in a significant increase of risk, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XXI. MANDATORY FINDINGS OF SIGNIFICANCE –				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐

As described in Section IV, all impacts on biological resources would be mitigated to a level less than significant. As described in Section V, all impacts on historical resources would be mitigated to less than significant. Therefore, the project would not have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory As such, mitigation measures have been incorporated to reduce impacts to less than significant as outlined within the Initial Study.

b) Does the project have impacts that are individually limited but cumulatively considerable ("cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒	☐	☐

As described in the MND, all impacts would be mitigated to less than significant.

Air quality is a regional issue, and the cumulative study area for air quality impacts encompasses the San Diego Air Basin as a whole. Therefore, the cumulative analysis addresses regional air quality plans and policies, such as the RAQS, as well as the project's contribution to a net increase of any criteria pollutant for which the San Diego Air Basin is listed as a non-attainment area. As described in Section III. a), the project would not construct any residential, commercial, or other uses. Consequently, the project would not result in growth that is not anticipated in SANDAG or County growth projections and would not generate any operational emissions. As described in Section III. b), the project would not result in construction emissions in excess of the applicable significance thresholds for all criteria pollutants. Consequently, the project would not result in an increase in emissions that are not already accounted for in the RAQS.

As described in Section V. a), mitigation would reduce potential cumulative impacts related to archaeological resources to a level less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact

As described in Section VII, the project would be consistent with the City's CAP. Therefore, the project's contribution of GHGs to cumulative statewide emissions would be less than cumulatively considerable. All other project impacts were determined to be less than significant, and due to the limited scope of the project, would result in less than significant cumulatively considerable impacts with mitigation incorporated.

c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐

As discussed in Section III, Air Quality, the project would have less than significant impacts in relation to air quality health concerns, given the distance between the project site and sensitive receptors. Potentially significant impacts to cultural and tribal cultural resources would be mitigated to below a level of significance. The project would not generate substantial noise during construction or operation that would have adverse effects on human being. As discussed in IX Hazards and Hazardous Materials, with incorporation of bid requirements and Whitebook requirements for the CHSP, the project would not create conditions that would significantly, directly or indirectly impact human beings. Other issue areas that could potentially create substantial adverse effects on human beings, such as risk of fire or floods, were determined to be less than significant. Thus, no substantial adverse effects on human beings, either indirectly or directly, would occur because of project implementation, and impacts would be less than significant with mitigation incorporated.

INITIAL STUDY CHECKLIST
REFERENCES

I. Aesthetics / Neighborhood Character

☒ City of San Diego General Plan
☒ County of San Diego General Plan
☒ City of Santee General Plan
☒ City of La Mesa General Plan
☒ City of El Cajon General Plan
☒ Community Plans: County Lakeside Community Plan

II. Agricultural Resources & Forest Resources

☐ City of San Diego General Plan
☒ U.S. Department of Agriculture, Soil Survey - San Diego Area, California, Part I and II, 1973
☐ California Department of Forestry and Fire Protection
☐ California Agricultural Land Evaluation and Site Assessment Model (1997)
☐ Site Specific Report:

III. Air Quality

☐ California Clean Air Act Guidelines (Indirect Source Control Programs) 1990
☒ Regional Air Quality Strategies (RAQS) - APCD
☒ Site Specific Report:
El Monte Water Transmission Pipeline Rehabilitation - Air Quality Technical Memorandum, Dudek, January 23, 2026

IV. Biology

☒ City of San Diego, Multiple Species Conservation Program (MSCP), Subarea Plan, 1997
☐ City of San Diego, MSCP, "Vegetation Communities with Sensitive Species and Vernal Pools" Maps, 1996
☒ City of San Diego, MSCP, "Multiple Habitat Planning Area" maps, 1997
☐ Community Plan - Resource Element
☐ California Department of Fish and Game, California Natural Diversity Database, "State and Federally-listed Endangered, Threatened, and Rare Plants of California," January 2001
☐ California Department of Fish and Game, California Natural Diversity Database, "State and Federally-listed Endangered and Threatened Animals of California, "January 2001
☒ City of San Diego Land Development Code Biology Guidelines
☒ Site Specific Report:
Biological Resources Technical Report El Monte Water Transmission Pipeline Rehabilitation Project, Dudek, April 2026
Aquatic Resources Delineation Report for El Monte Water Transmission Pipeline Rehabilitation Project City Of San Diego, California, Kleinfelder, November 2025

V. Cultural Resources (includes Historical Resources and Built Environment)

☒ City of San Diego Historical Resources Guidelines
☐ City of San Diego Archaeology Library
☒ Historical Resources Board List

☐ Community Historical Survey:
☒ Site Specific Report:
Historic Property Identification Report for the El Monde Water Transmission Pipeline Rehabilitation Project (H197037), Kleinfelder, March 24, 2026

VI. Energy

☒ City of San Diego Climate Action Plan (CAP), (City of San Diego 2022)
☐ City of San Diego Climate Action Plan Consistency Regulations (SDMC Ch 14 Art 3 Div 14)
☒ Site Specific Report:
Climate Action Plan (CAP) Memo for El Monte Pipeline No 2 (Project) (WBS # S-10008), City of San Diego, February 2, 2026

VII. Geology/Soils

☒ City of San Diego Seismic Safety Study
☐ U.S. Department of Agriculture Soil Survey - San Diego Area, California, Part I and II, December 1973 and Part III, 1975
☒ City of San Diego Paleontological Guidelines
☐ Deméré, Thomas A., and Stephen L. Walsh, "Paleontological Resources City of San Diego," Department of Paleontology San Diego Natural History Museum, 1996
☐ Kennedy, Michael P., and Gary L. Peterson, "Geology of the San Diego Metropolitan Area, California. Del Mar, La Jolla, Point Loma, La Mesa, Poway, and SW 1/4 Escondido 7 1/2 Minute Quadrangles," *California Division of Mines and Geology Bulletin* 200, Sacramento, 1975
☐ Kennedy, Michael P., and Siang S. Tan, "Geology of National City, Imperial Beach and Otay Mesa Quadrangles, Southern San Diego Metropolitan Area, California," Map Sheet 29, 1977
☒ Site Specific Report:
Geologic Study and Geotechnical Engineering Report Design of El Monte Water Transmission Pipeline Rehabilitation, Kleinfelder 2025

VIII. Greenhouse Gas Emissions

☒ Site Specific Report:
Climate Action Plan (CAP) Memo for El Monte Pipeline No 2 (Project) (WBS # S-10008), City of San Diego, February 2, 2026

IX. Hazards and Hazardous Materials

☐ San Diego County Hazardous Materials Environmental Assessment Listing
☐ San Diego County Hazardous Materials Management Division
☐ FAA Determination
☐ State Assessment and Mitigation, Unauthorized Release Listing, Public Use Authorized
☐ Airport Land Use Compatibility Plan
☐ US EPA Underground Storage Tank (UST) Finder
☒ CA Department of Toxic Substances Control Envirostor
☒ State Water Resources Control Board GeoTracker
☐ Site Specific Report:

X. Hydrology/Water Quality

☒ Flood Insurance Rate Map (FIRM)

☒ Federal Emergency Management Agency (FEMA), National Flood Insurance Program-Flood Boundary and Floodway Map
☐ Clean Water Act Section 303(b) list, http://www.swrcb.ca.gov/tmdl/303d_lists.html
☒ 100% Design Plans
☒ Site Specific Report:
Geologic Study and Geotechnical Engineering Report Design of El Monte Water Transmission Pipeline Rehabilitation, Kleinfelder 2025

XI. Land Use and Planning

☒ City of San Diego General Plan
☒ County of San Diego General Plan
☒ City of Santee General Plan
☒ City of La Mesa General Plan
☒ City of El Cajon General Plan
☒ Community Plans: County Lakeside Community Plan
☒ Airport Land Use Compatibility Plan: Gillespie Field
☒ City of San Diego Zoning Maps
☐ FAA Determination:
☐ Other Plans:

XII. Mineral Resources

☒ California Department of Conservation - Division of Mines and Geology, Mineral Land Classification
☐ Division of Mines and Geology, Special Report 153 - Significant Resources Maps
☐ City of San Diego General Plan: Conservation Element
☐ Site Specific Report:

XIII. Noise

☒ City of San Diego General Plan
☐ Community Plan
☒ Gillespie Field ALUCP
☐ San Diego Association of Governments - San Diego Regional Average Weekday Traffic Volumes
☐ San Diego Metropolitan Area Average Weekday Traffic Volume Maps, SANDAG
☒ Site Specific Report:
Biological Resources Technical Report El Monte Water Transmission Pipeline Rehabilitation Project, Dudek, March 13, 2026

XIV. Population / Housing

☒ City of San Diego General Plan
☒ County of San Diego General Plan
☐ Series 11/Series 12 Population Forecasts, SANDAG
☐ Other:

XV. Public Services

☒ City of San Diego General Plan
☒ County of San Diego General Plan

☒ City of Santee General Plan
☒ City of La Mesa General Plan
☒ City of El Cajon General Plan
☐ Community Plan

XVI. Recreational Resources

☒ City of San Diego General Plan
☒ County of San Diego General Plan
☒ City of Santee General Plan
☒ City of La Mesa General Plan
☒ City of El Cajon General Plan
☒ Community Plans: County Lakeside Community Plan
☐ Department of Park and Recreation
☐ City of San Diego - San Diego Regional Bicycling Map
☐ Additional Resources:

XVII. Transportation / Circulation

☒ City of San Diego Transportation Study Manual
☐ Community Plan:
☐ San Diego Metropolitan Area Average Weekday Traffic Volume Maps, SANDAG
☐ San Diego Region Weekday Traffic Volumes, SANDAG
☐ Site Specific Report:

XVIII. Tribal Cultural Resources

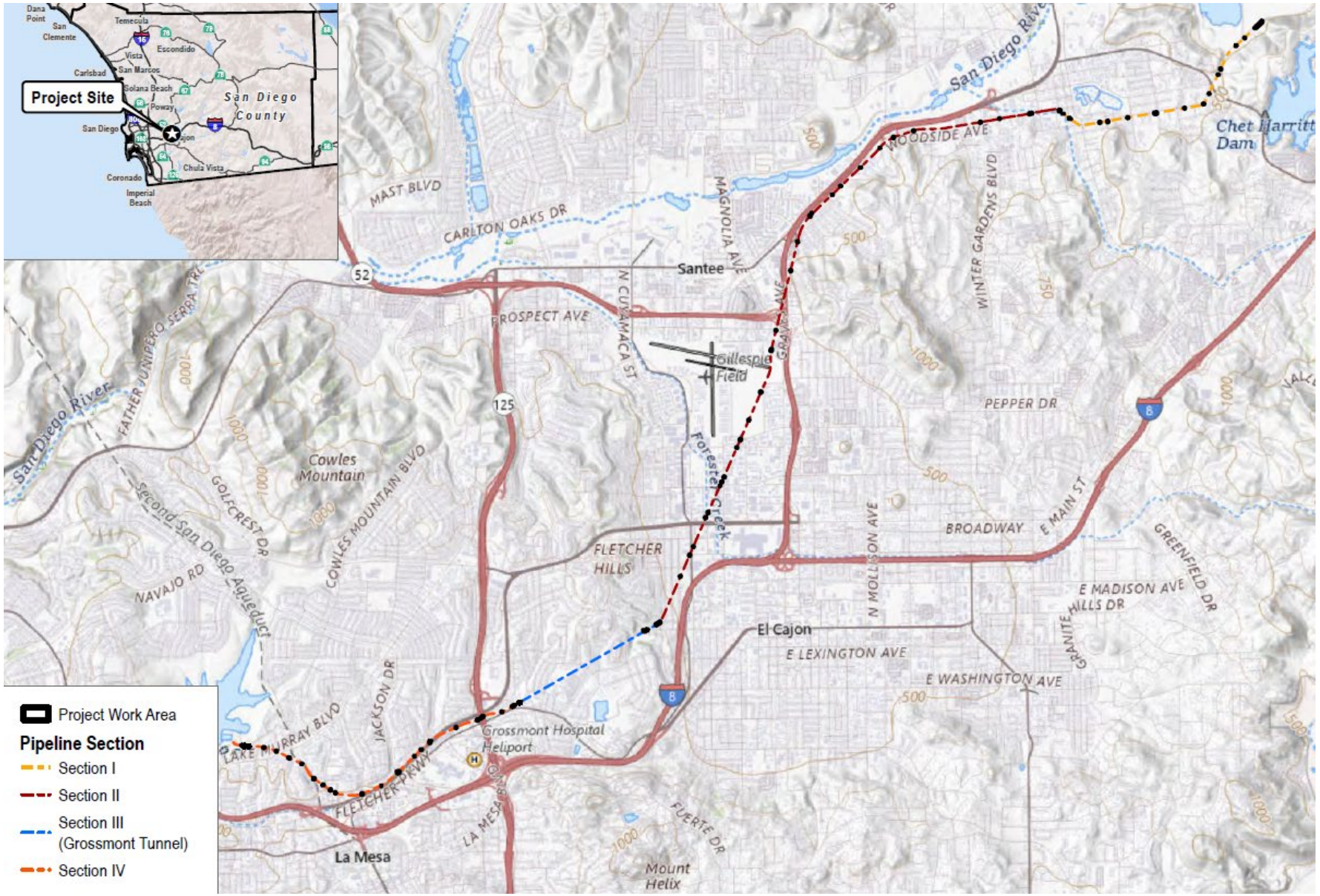
☐ City of San Diego Historical Resources Guidelines
☐ City of San Diego Archaeology Library
☐ Historical Resources Board List
☐ Community Historical Survey
☒ Site Specific Report:
Historic Property Identification Report for the El Monde Water Transmission Pipeline Rehabilitation Project (H197037), Kleinfelder, March 24, 2026

XIX. Utilities and Service Systems

☐ City of San Diego General Plan
☐ Community Plan:
☐ Site Specific Report:

XX. Wildfire

☒ California Department of Forestry and Fire Protection Fire Hazard Severity Zones Mapping Tool
☐ City of San Diego General Plan
☐ Community Plan:
☒ San Diego County Multi-Jurisdictional Hazard Mitigation Plan
☐ Very High Fire Severity Zone Map, City of San Diego
☒ City of San Diego Brush Management Regulations, Landscape Regulations (SDMC 142.0412)
☐ Site Specific Report:



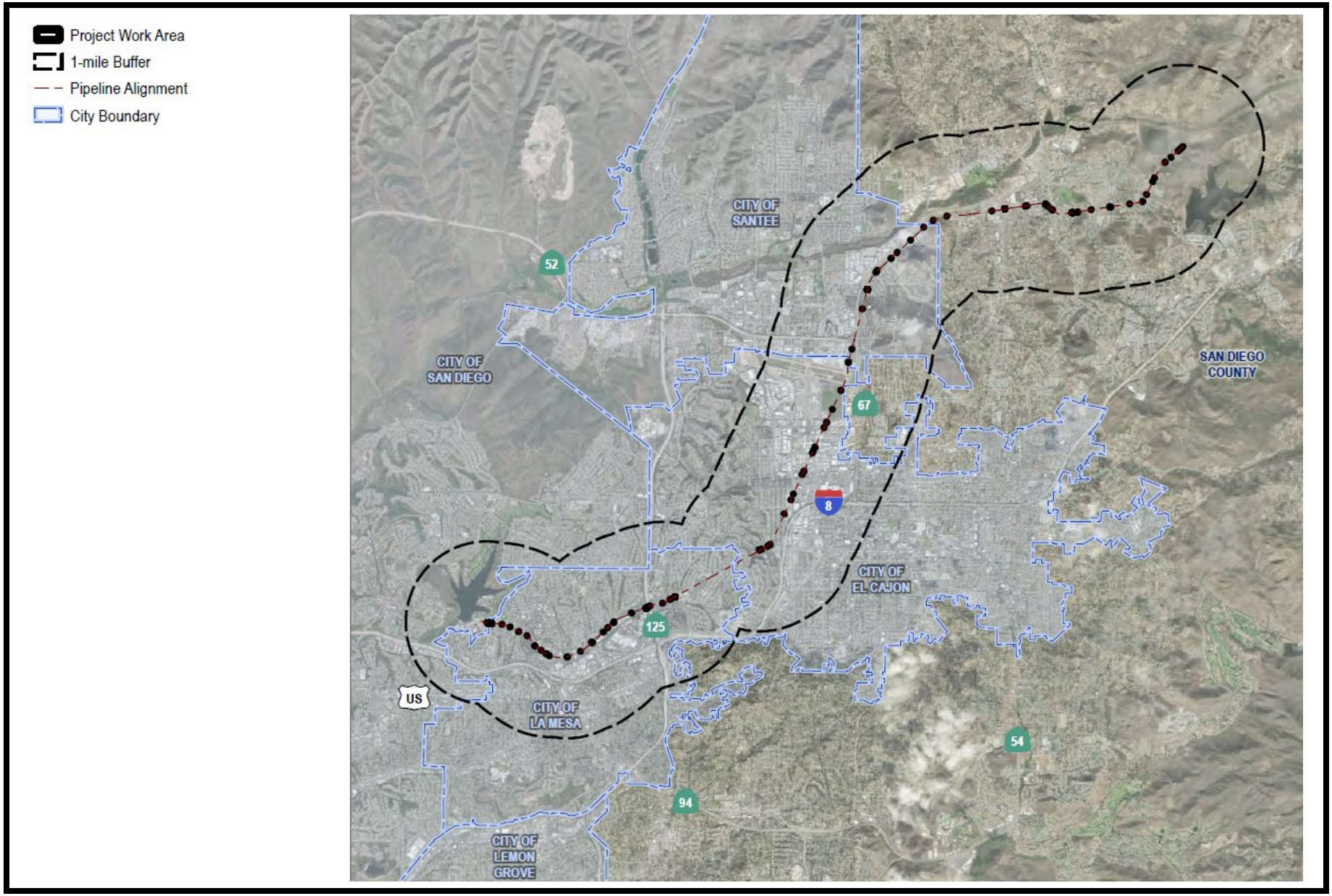
The City of SAN DIEGO

Project Location

El Monte Pipeline, WBS #S-10008.02.06

Engineering & Capital Projects Department

FIGURE No. 1



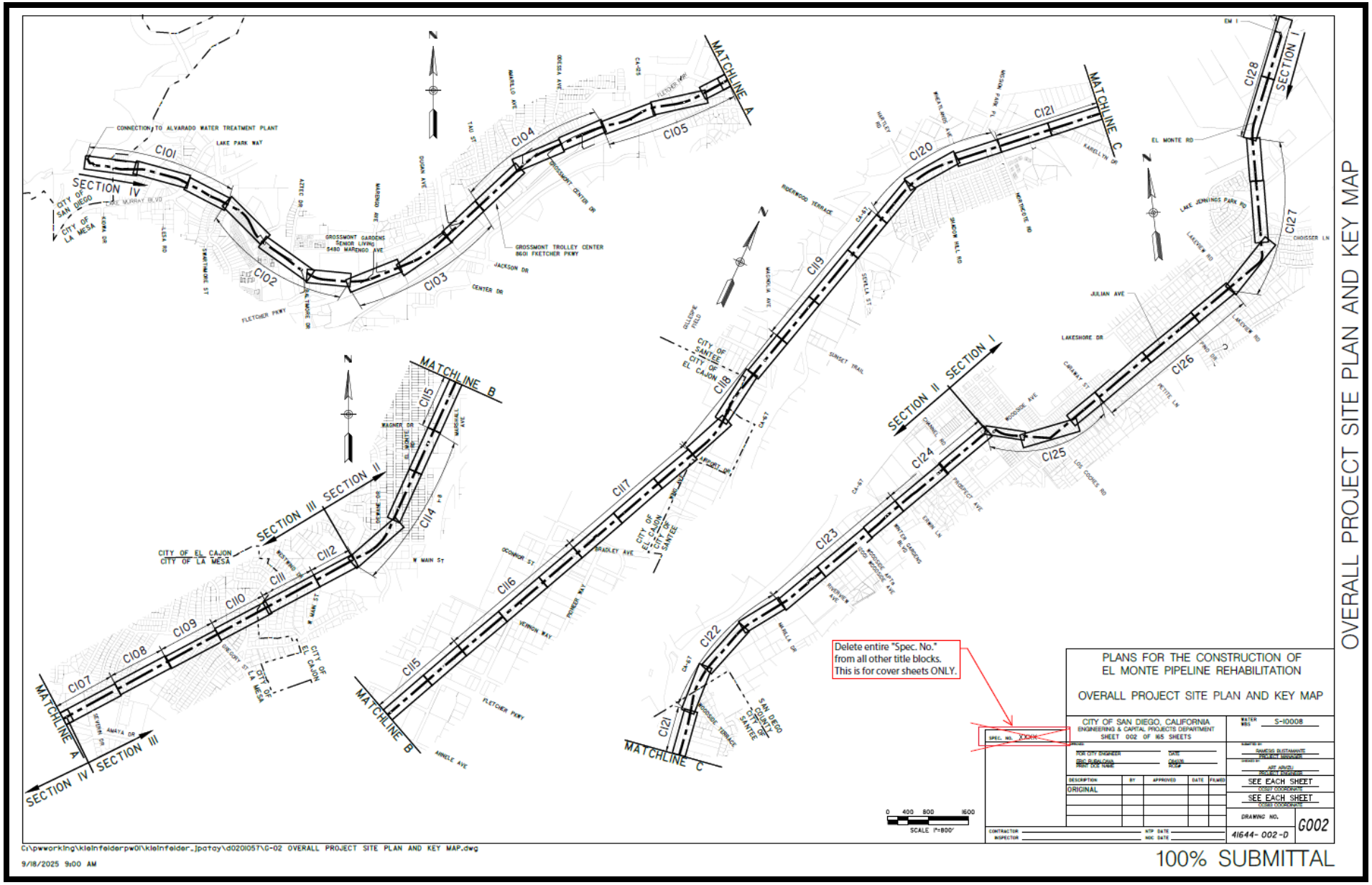
The City of SAN DIEGO

City and County Jurisdiction

El Monte Pipeline, WBS #S-10008.02.06

Engineering & Capital Projects Department

FIGURE No. 2



The City of SAN DIEGO

Overall Project Site Plan and Key Map

El Monte Pipeline, WBS #S-10008.02.06

Engineering & Capital Projects Department

FIGURE No. 3