



CLIMATE ACTION PLAN CONSISTENCY CHECKLIST INTRODUCTION

In December 2015, the City adopted a Climate Action Plan (CAP) that outlines the actions that City will undertake to achieve its proportional share of State greenhouse gas (GHG) emission reductions. The purpose of the Climate Action Plan Consistency Checklist (Checklist) is to, in conjunction with the CAP, provide a streamlined review process for proposed new development projects that are subject to discretionary review and trigger environmental review pursuant to the California Environmental Quality Act (CEQA).¹

Analysis of GHG emissions and potential climate change impacts from new development is required under CEQA. The CAP is a plan for the reduction of GHG emissions in accordance with CEQA Guidelines Section 15183.5. Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the CAP.

This Checklist is part of the CAP and contains measures that are required to be implemented on a project-by-project basis to ensure that the specified emissions targets identified in the CAP are achieved. Implementation of these measures would ensure that new development is consistent with the CAP's assumptions for relevant CAP strategies toward achieving the identified GHG reduction targets. Projects that are consistent with the CAP as determined through the use of this Checklist may rely on the CAP for the cumulative impacts analysis of GHG emissions. Projects that are not consistent with the CAP must prepare a comprehensive project-specific analysis of GHG emissions, including quantification of existing and projected GHG emissions and incorporation of the measures in this Checklist to the extent feasible. Cumulative GHG impacts would be significant for any project that is not consistent with the CAP.

The Checklist may be updated to incorporate new GHG reduction techniques or to comply with later amendments to the CAP or local, State, or federal law.

¹ Certain projects seeking ministerial approval may be required to complete the Checklist. For example, projects in a Community Plan Implementation Overlay Zone may be required to use the Checklist to qualify for ministerial level review. See Supplemental Development Regulations in the project's community plan to determine applicability.

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CAP CONSISTENCY CHECKLIST SUBMITTAL APPLICATION

- ❖ The Checklist is required only for projects subject to CEQA review.²
- ❖ If required, the Checklist must be included in the project submittal package. Application submittal procedures can be found in [Chapter 11: Land Development Procedures](#) of the City's Municipal Code.
- ❖ The requirements in the Checklist will be included in the project's conditions of approval.
- ❖ The applicant must provide an explanation of how the proposed project will implement the requirements described herein to the satisfaction of the Planning Department.

Application Information

Contact Information

Project No./Name: _____

Property Address: _____

Applicant Name/Co.: _____

Contact Phone: _____ Contact Email: _____

Was a consultant retained to complete this checklist? Yes No If Yes, complete the following

Consultant Name: _____ Contact Phone: _____

Company Name: _____ Contact Email: _____

Project Information

1. What is the size of the project (acres)? _____

2. Identify all applicable proposed land uses:

Residential (indicate # of single-family units): _____

Residential (indicate # of multi-family units): _____

Commercial (total square footage): _____

Industrial (total square footage): _____

Other (describe): _____

3. Is the project or a portion of the project located in a Transit Priority Area? Yes No

4. Provide a brief description of the project proposed:

² Certain projects seeking ministerial approval may be required to complete the Checklist. For example, projects in a Community Plan Implementation Overlay Zone may be required to use the Checklist to qualify for ministerial level review. See Supplemental Development Regulations in the project's community plan to determine applicability.



CAP CONSISTENCY CHECKLIST QUESTIONS

Step 1: Land Use Consistency

The first step in determining CAP consistency for discretionary development projects is to assess the project's consistency with the growth projections used in the development of the CAP. This section allows the City to determine a project's consistency with the land use assumptions used in the CAP.

Step 1: Land Use Consistency		
Checklist Item (Check the appropriate box and provide explanation and supporting documentation for your answer)	Yes	No
A. Is the proposed project consistent with the existing General Plan and Community Plan land use and zoning designations?; ³ <u>OR</u>		
B. If the proposed project is not consistent with the existing land use plan and zoning designations, and includes a land use plan and/or zoning designation amendment, would the proposed amendment result in an increased density within a Transit Priority Area (TPA) ⁴ and implement CAP Strategy 3 actions, as determined in Step 3 to the satisfaction of the Development Services Department?; <u>OR</u> ,	<input type="checkbox"/>	<input type="checkbox"/>
C. If the proposed project is not consistent with the existing land use plan and zoning designations, does the project include a land use plan and/or zoning designation amendment that would result in an equivalent or less GHG-intensive project when compared to the existing designations?		

If **"Yes,"** proceed to Step 2 of the Checklist. For question B above, complete Step 3. For question C above, provide estimated project emissions under both existing and proposed designation(s) for comparison. Compare the maximum buildout of the existing designation and the maximum buildout of the proposed designation.

If **"No,"** in accordance with the City's Significance Determination Thresholds, the project's GHG impact is significant. The project must nonetheless incorporate each of the measures identified in Step 2 to mitigate cumulative GHG emissions impacts unless the decision maker finds that a measure is infeasible in accordance with CEQA Guidelines Section 15091. Proceed and complete Step 2 of the Checklist.

³ This question may also be answered in the affirmative if the project is consistent with SANDAG Series 12 growth projections, which were used to determine the CAP projections, as determined by the Planning Department.

⁴ This category applies to all projects that answered in the affirmative to question 3 on the previous page: Is the project or a portion of the project located in a transit priority area.

Step 2: CAP Strategies Consistency

The second step of the CAP consistency review is to review and evaluate a project's consistency with the applicable strategies and actions of the CAP. Step 2 only applies to development projects that involve permits that would require a certificate of occupancy from the Building Official or projects comprised of one and two family dwellings or townhouses as defined in the California Residential Code and their accessory structures.⁵ All other development projects that would not require a certificate of occupancy from the Building Official shall implement Best Management Practices for construction activities as set forth in the [Greenbook](#) (for public projects).

Step 2: CAP Strategies Consistency			
Checklist Item (Check the appropriate box and provide explanation for your answer)	Yes	No	N/A
Strategy 1: Energy & Water Efficient Buildings			
<p>1. <i>Cool/Green Roofs.</i></p> <ul style="list-style-type: none"> • Would the project include roofing materials with a minimum 3-year aged solar reflection and thermal emittance or solar reflection index equal to or greater than the values specified in the voluntary measures under California Green Building Standards Code (Attachment A)?; <u>OR</u> • Would the project roof construction have a thermal mass over the roof membrane, including areas of vegetated (green) roofs, weighing at least 25 pounds per square foot as specified in the voluntary measures under California Green Building Standards Code?; <u>OR</u> • Would the project include a combination of the above two options? <p>Check "N/A" only if the project does not include a roof component.</p> <div style="border: 1px solid black; height: 150px; width: 100%; margin-top: 10px;"></div>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

⁵ Actions that are not subject to Step 2 would include, for example: 1) discretionary map actions that do not propose specific development, 2) permits allowing wireless communication facilities, 3) special events permits, 4) use permits or other permits that do not result in the expansion or enlargement of a building (e.g., decks, garages, etc.), and 5) non-building infrastructure projects such as roads and pipelines. Because such actions would not result in new occupancy buildings from which GHG emissions reductions could be achieved, the items contained in Step 2 would not be applicable.

2. *Plumbing fixtures and fittings*

With respect to plumbing fixtures or fittings provided as part of the project, would those low-flow fixtures/appliances be consistent with each of the following:

Residential buildings:

- Kitchen faucets: maximum flow rate not to exceed 1.5 gallons per minute at 60 psi;
- Standard dishwashers: 4.25 gallons per cycle;
- Compact dishwashers: 3.5 gallons per cycle; and
- Clothes washers: water factor of 6 gallons per cubic feet of drum capacity?

Nonresidential buildings:

- Plumbing fixtures and fittings that do not exceed the maximum flow rate specified in [Table A5.303.2.3.1 \(voluntary measures\) of the California Green Building Standards Code](#) (See Attachment A); and
- Appliances and fixtures for commercial applications that meet the provisions of [Section A5.303.3 \(voluntary measures\) of the California Green Building Standards Code](#) (See Attachment A)?

Check "N/A" only if the project does not include any plumbing fixtures or fittings.

	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Strategy 3: Bicycling, Walking, Transit & Land Use

3. *Electric Vehicle Charging*

- Multiple-family projects of 17 dwelling units or less: Would 3% of the total parking spaces required, or a minimum of one space, whichever is greater, be provided with a listed cabinet, box or enclosure connected to a conduit linking the parking spaces with the electrical service, in a manner approved by the building and safety official, to allow for the future installation of electric vehicle supply equipment to provide electric vehicle charging stations at such time as it is needed for use by residents?
- Multiple-family projects of more than 17 dwelling units: Of the total required listed cabinets, boxes or enclosures, would 50% have the necessary electric vehicle supply equipment installed to provide active electric vehicle charging stations ready for use by residents?
- Non-residential projects: Of the total required listed cabinets, boxes or enclosures, would 50% have the necessary electric vehicle supply equipment installed to provide active electric vehicle charging stations ready for use?

Check "N/A" only if the project is a single-family project or would not require the provision of listed cabinets, boxes, or enclosures connected to a conduit linking the parking spaces with electrical service, e.g., projects requiring fewer than 10 parking spaces.

Strategy 3: Bicycling, Walking, Transit & Land Use

(Complete this section if project includes non-residential or mixed uses)

4. *Bicycle Parking Spaces*

Would the project provide more short- and long-term bicycle parking spaces than required in the City's Municipal Code ([Chapter 14, Article 2, Division 5](#))?⁶

Check "N/A" only if the project is a residential project.

⁶ Non-portable bicycle corrals within 600 feet of project frontage can be counted towards the project's bicycle parking requirements.

5. *Shower facilities*

If the project includes nonresidential development that would accommodate over 10 tenant occupants (employees), would the project include changing/shower facilities in accordance with the voluntary measures under the [California Green Building Standards Code](#) as shown in the table below?

Number of Tenant Occupants (Employees)	Shower/Changing Facilities Required	Two-Tier (12" X 15" X 72") Personal Effects Lockers Required
0-10	0	0
11-50	1 shower stall	2
51-100	1 shower stall	3
101-200	1 shower stall	4
Over 200	1 shower stall plus 1 additional shower stall for each 200 additional tenant-occupants	1 two-tier locker plus 1 two-tier locker for each 50 additional tenant-occupants

Check "N/A" only if the project is a residential project, or if it does not include nonresidential development that would accommodate over 10 tenant occupants (employees).

6. *Designated Parking Spaces*

If the project includes a nonresidential use in a TPA, would the project provide designated parking for a combination of low-emitting, fuel-efficient, and carpool/vanpool vehicles in accordance with the following table?

Number of Required Parking Spaces	Number of Designated Parking Spaces
0-9	0
10-25	2
26-50	4
51-75	6
76-100	9
101-150	11
151-200	18
201 and over	At least 10% of total

This measure does not cover electric vehicles. See Question 4 for electric vehicle parking requirements.

Note: Vehicles bearing Clean Air Vehicle stickers from expired HOV lane programs may be considered eligible for designated parking spaces. The required designated parking spaces are to be provided within the overall minimum parking requirement, not in addition to it.

Check "N/A" only if the project is a residential project, or if it does not include nonresidential use in a TPA.

7. *Transportation Demand Management Program*

If the project would accommodate over 50 tenant-occupants (employees), would it include a transportation demand management program that would be applicable to existing tenants and future tenants that includes:

At least one of the following components:

- Parking cash out program
- Parking management plan that includes charging employees market-rate for single-occupancy vehicle parking and providing reserved, discounted, or free spaces for registered carpools or vanpools
- Unbundled parking whereby parking spaces would be leased or sold separately from the rental or purchase fees for the development for the life of the development

And at least three of the following components:

- Commitment to maintaining an employer network in the SANDAG iCommute program and promoting its RideMatcher service to tenants/employees
- On-site carsharing vehicle(s) or bikesharing
- Flexible or alternative work hours
- Telework program
- Transit, carpool, and vanpool subsidies
- Pre-tax deduction for transit or vanpool fares and bicycle commute costs
- Access to services that reduce the need to drive, such as cafes, commercial stores, banks, post offices, restaurants, gyms, or childcare, either onsite or within 1,320 feet (1/4 mile) of the structure/use?

Check "N/A" only if the project is a residential project or if it would not accommodate over 50 tenant-occupants (employees).

Step 3: Project CAP Conformance Evaluation (if applicable)

The third step of the CAP consistency review only applies if Step 1 is answered in the affirmative under option B. The purpose of this step is to determine whether a project that is located in a TPA but that includes a land use plan and/or zoning designation amendment is nevertheless consistent with the assumptions in the CAP because it would implement CAP Strategy 3 actions. In general, a project that would result in a reduction in density inside a TPA would not be consistent with Strategy 3. The following questions must each be answered in the affirmative and fully explained.

1. Would the proposed project implement the General Plan's City of Villages strategy in an identified Transit Priority Area (TPA) that will result in an increase in the capacity for transit-supportive residential and/or employment densities?

Considerations for this question:

- Does the proposed land use and zoning designation associated with the project provide capacity for transit-supportive residential densities within the TPA?
- Is the project site suitable to accommodate mixed-use village development, as defined in the General Plan, within the TPA?
- Does the land use and zoning associated with the project increase the capacity for transit-supportive employment intensities within the TPA?

2. Would the proposed project implement the General Plan's Mobility Element in Transit Priority Areas to increase the use of transit?

Considerations for this question:

- Does the proposed project support/incorporate identified transit routes and stops/stations?
- Does the project include transit priority measures?

3. Would the proposed project implement pedestrian improvements in Transit Priority Areas to increase walking opportunities?

Considerations for this question:

- Does the proposed project circulation system provide multiple and direct pedestrian connections and accessibility to local activity centers (such as transit stations, schools, shopping centers, and libraries)?
- Does the proposed project urban design include features for walkability to promote a transit supportive environment?

4. Would the proposed project implement the City of San Diego's Bicycle Master Plan to increase bicycling opportunities?

Considerations for this question:

- Does the proposed project circulation system include bicycle improvements consistent with the Bicycle Master Plan?
- Does the overall project circulation system provide a balanced, multimodal, "complete streets" approach to accommodate mobility needs of all users?

5. Would the proposed project incorporate implementation mechanisms that support Transit Oriented Development?

Considerations for this question:

- Does the proposed project include new or expanded urban public spaces such as plazas, pocket parks, or urban greens in the TPA?
- Does the land use and zoning associated with the proposed project increase the potential for jobs within the TPA?
- Do the zoning/implementing regulations associated with the proposed project support the efficient use of parking through mechanisms such as: shared parking, parking districts, unbundled parking, reduced parking, paid or time-limited parking, etc.?

6. Would the proposed project implement the Urban Forest Management Plan to increase urban tree canopy coverage?

Considerations for this question:

- Does the proposed project provide at least three different species for the primary, secondary and accent trees in order to accommodate varying parkway widths?
- Does the proposed project include policies or strategies for preserving existing trees?
- Does the proposed project incorporate tree planting that will contribute to the City's 20% urban canopy tree coverage goal?



CLIMATE ACTION PLAN CONSISTENCY CHECKLIST

ATTACHMENT A

This attachment provides performance standards for applicable Climate Action Plan (CAP) Consistency Checklist measures.

Table 1 Roof Design Values for Question 1: Cool/Green Roofs supporting Strategy 1: Energy & Water Efficient Buildings of the Climate Action Plan				
Land Use Type	Roof Slope	Minimum 3-Year Aged Solar Reflectance	Thermal Emittance	Solar Reflective Index
Low-Rise Residential	≤ 2:12	0.55	0.75	64
	> 2:12	0.20	0.75	16
High-Rise Residential Buildings, Hotels and Motels	≤ 2:12	0.55	0.75	64
	> 2:12	0.20	0.75	16
Non-Residential	≤ 2:12	0.55	0.75	64
	> 2:12	0.20	0.75	16

Source: Adapted from the [California Green Building Standards Code \(CALGreen\)](#) Tier 1 residential and non-residential voluntary measures shown in Tables A4.106.5.1 and A5.106.11.2.2, respectively. Roof installation and verification shall occur in accordance with the CALGreen Code.

CALGreen does not include recommended values for low-rise residential buildings with roof slopes of ≤ 2:12 for San Diego's climate zones (7 and 10). Therefore, the values for climate zone 15 that covers Imperial County are adapted here.

Solar Reflectance Index (SRI) equal to or greater than the values specified in this table may be used as an alternative to compliance with the aged solar reflectance values and thermal emittance.

Table 2 Fixture Flow Rates for Non-Residential Buildings related to Question 2: Plumbing Fixtures and Fittings supporting Strategy 1: Energy & Water Efficient Buildings of the Climate Action Plan

Fixture Type	Maximum Flow Rate
Showerheads	1.8 gpm @ 80 psi
Lavatory Faucets	0.35 gpm @60 psi
Kitchen Faucets	1.6 gpm @ 60 psi
Wash Fountains	1.6 [rim space(in.)/20 gpm @ 60 psi]
Metering Faucets	0.18 gallons/cycle
Metering Faucets for Wash Fountains	0.18 [rim space(in.)/20 gpm @ 60 psi]
Gravity Tank-type Water Closets	1.12 gallons/flush
Flushometer Tank Water Closets	1.12 gallons/flush
Flushometer Valve Water Closets	1.12 gallons/flush
Electromechanical Hydraulic Water Closets	1.12 gallons/flush
Urinals	0.5 gallons/flush

Source: Adapted from the [California Green Building Standards Code](#) (CALGreen) Tier 1 non-residential voluntary measures shown in Tables A5.303.2.3.1 and A5.106.11.2.2, respectively. See the [California Plumbing Code](#) for definitions of each fixture type.

Where complying faucets are unavailable, aerators rated at 0.35 gpm or other means may be used to achieve reduction.

Acronyms:

gpm = gallons per minute

psi = pounds per square inch (unit of pressure)

in. = inch

Table 3 Standards for Appliances and Fixtures for Commercial Application related to Question 2: Plumbing Fixtures and Fittings supporting Strategy 1: Energy & Water Efficient Buildings of the Climate Action Plan

Appliance/Fixture Type	Standard	
Clothes Washers	Maximum Water Factor (WF) that will reduce the use of water by 10 percent below the California Energy Commissions' WF standards for commercial clothes washers located in Title 20 of the <i>California Code of Regulations</i> .	
Conveyor-type Dishwashers	0.70 maximum gallons per rack (2.6 L) (High-Temperature)	0.62 maximum gallons per rack (4.4 L) (Chemical)
Door-type Dishwashers	0.95 maximum gallons per rack (3.6 L) (High-Temperature)	1.16 maximum gallons per rack (2.6 L) (Chemical)
Undercounter-type Dishwashers	0.90 maximum gallons per rack (3.4 L) (High-Temperature)	0.98 maximum gallons per rack (3.7 L) (Chemical)
Combination Ovens	Consume no more than 10 gallons per hour (38 L/h) in the full operational mode.	
Commercial Pre-rinse Spray Valves (manufactured on or after January 1, 2006)	Function at equal to or less than 1.6 gallons per minute (0.10 L/s) at 60 psi (414 kPa) and <ul style="list-style-type: none"> • Be capable of cleaning 60 plates in an average time of not more than 30 seconds per plate. • Be equipped with an integral automatic shutoff. • Operate at static pressure of at least 30 psi (207 kPa) when designed for a flow rate of 1.3 gallons per minute (0.08 L/s) or less. 	

Source: Adapted from the [California Green Building Standards Code](#) (CALGreen) Tier 1 non-residential voluntary measures shown in Section A5.303.3. See the [California Plumbing Code](#) for definitions of each appliance/fixture type.

Acronyms:

L = liter

L/h = liters per hour

L/s = liters per second

psi = pounds per square inch (unit of pressure)

kPa = kilopascal (unit of pressure)

CLIMATE ACTION PLAN CONSISTENCY CHECKLIST ATTACHMENT B:
El Cap Spillway CAP Strategies Consistency

1. Energy & Water Efficient Buildings

The CAP's first strategy is aimed at energy and water efficient buildings. The City's goals under Strategy 1 include reducing residential building and municipal energy consumption and reducing daily per-capita water consumption. Actions to reduce energy consumption include consideration of a residential Energy Conservation and Disclosure Ordinance and a Municipal Energy Strategy and Implementation Plan. Actions related to water efficiency include implementing new water rates and billing structure, consideration of a Water Conservation and Disclosure Ordinance, and implementation of an Outdoor Landscaping Ordinance requiring weather-based irrigation controllers. Strategy 1 actions are directed at City staff and City Council to adopt ordinances, plans, and supporting City requirements to achieve the City's targets. The El Capitan Spillway Clearing Project (Project) is maintenance of existing City-owned infrastructure. The Project does not involve new construction or maintenance of a building. The Project would not conflict with the City's ability to implement the actions identified in the CAP related to energy and water efficient buildings.

The Project is maintenance to an existing dam structure (spillway). This maintenance is required for ongoing operation of an existing facility with no expansion of use or modification of the facility. The El Capitan Dam is one of 9 surface water reservoirs used to impound local runoff and provide local water supply. Local water supply contributes to San Diego's resiliency to climate change affects. Additionally, use of local water versus imported water from North California or the Colorado River reduces energy and GHG emissions, further contributing to the City's CAP goals.

The 2008 General Plan Program Environmental Impact Report (PEIR) analyzed the impacts of the infrastructure necessary for implementation of the 2008 General Plan such as providing water, including ongoing maintenance of existing facilities like City surface water reservoirs and dams (3.14 Public Utilities). The Project is maintenance of an existing facility that itself does not create a demand for energy. The spillway is a concrete structure that passively conveys water downstream of the dam via gravity without the need for pumping or electricity use. The Project will implement Best Management Practices for construction activities as set forth in the Greenbook (for public projects) that further energy efficiency. The Greenbook, which is also known as the Standard Specifications for Public Works Construction, has a section on work site maintenance that includes measures for pollution control and equipment maintenance. Maintaining construction equipment in proper working condition according to manufacturer's specifications, as required by the Greenbook, is one way to ensure energy efficiency. The Greenbook also includes construction operations measures that would limit pollution including air emissions. All City contract documents require that the contractor conform to the Greenbook and the City's supplement, the Whitebook. Additionally, California regulations limit construction equipment and vehicle idling by requiring that equipment be shut off when not in use and that idling not exceed five minutes [California Code of Regulations, Title 13, sections 2449(d)(3) and 2485]. Signs must be posted at entrances to work

sites stating this requirement. The California Air Resources Board (CARB) enforces idling limitations and compliance with diesel fleet regulations. CARB also issues certificates of compliance for off-road diesel-powered equipment. As such, the Project would be consistent with the applicable CAP goals and actions identified in Strategy 1.

2. Clean & Renewable Energy

Strategy 2 focuses on clean and renewable energy. Strategy 2 goals of transitioning to 100% renewable energy on the Citywide electrical grid by 2035, increasing municipal zero-emissions vehicles, and converting existing diesel municipal solid waste collection trucks to compressed natural gas or other alternative low emissions fuels would not apply to implementation of the Project because it solely includes maintenance of existing infrastructure and does not propose or dictate any City policy related to municipal zero-emissions vehicles, solid waste collection trucks, or other alternative fuels. The project scope does not include any development that would support or create renewable energy. The Project would not conflict with the City's ability to implement the actions identified in Strategy 2 and the achievement of a goal of 100% renewable energy. Maintenance of the El Capitan Dam Spillway supports continued use of existing local water supplies and will prevent mandated draw downs of the reservoir level and level restrictions implemented by the State for safety that reduce local water storage and usage. Utilization of local water supplies like those stored at El Capitan reduce energy associated with importing water and contribute to the City's GHG reduction goals.

3. Bicycling, Walking, Transit & Land Use

Strategy 3 outlines goals and actions related to bicycling, walking, transit, and land use. Strategy 3 goals include increasing the use of mass transit, increasing commuter walking and bicycling opportunities, reducing vehicle fuel consumption, and promoting effective land use to reduce vehicle miles traveled. The Project involves maintenance of a dam which is a secured facility and not accessible to the public for bicycling, walking, transit. The land uses at the Project location include open space park/preserve and undevelopable natural area. The Project site is unzoned and outside of any City recognized community planning areas. It is not suitable for the addition of mass transit and does not support commuter walking and bicycling opportunities. The Project did not require a VMT analysis per the City of San Diego Transportation Study Manual under Criteria 3 – Small Project as it would generate less than 300 daily trips during the initial maintenance effort and periodic inspections by Public Utilities Department (PUD) staff would not significantly increase vehicle miles traveled to the site. Because the Project involves operations and maintenance of existing PUD infrastructure, there is no proposed change in land use or measures that would reduce vehicle miles traveled as there is no new development proposed as part of the Project. The Project will remove debris (rocks, sediment, and other soils) from the spillway that will be reused on site on access paths and roads to reduce the number of haul out trips. The Project is consistent with this strategy and does not conflict with the City's ability to implement the actions identified in Strategy 3 and the achievement of the Strategy 3 goals.

4. Zero Waste (Gas & Waste Management)

Strategy 4, which focuses on zero waste, includes the goal of diverting solid waste and capturing landfill CH₄ gas emissions, and capturing CH₄ gas from wastewater treatment. Both Strategy 4 goals would be implemented by various City departments and the Project would not conflict with implementation of the actions required to meet the City's targets. The Project waste includes soils and vegetation removed from the El Capitan Spillway which will be reused as fill or aggregate material on site for access roads or other operational needs or recycled for use at other PUD facilities. The Project would be required to submit and implement a waste management plan and dispose of any vegetation and debris that cannot be reused or recycled at the Miramar Landfill and Miramar Greenery consistent with the City's Construction and Demolition Debris Diversion Ordinance and the City's Whitebook Standards Specifications for Public Works Construction. Project operations would generally not increase solid waste production, and thus, would not impede the achievement of this goal. Therefore, the Project would comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

5. Climate Resiliency

Strategy 5 relates to climate resiliency and includes the goal of increasing tree canopy coverage. The action under this goal includes consideration of a Citywide Urban Tree Planting Program, which would incorporate water conservation measures and prioritization of drought-tolerant and native trees and plantings in areas with recycled water. The Project does not conflict with the City's ability to implement the goals under this strategy. The Project is in unincorporated San Diego County within the Cleveland National Forest outside of areas considered in the City's Urban Forestry Plan. The Project will not result in the removal of any trees that are considered part of the urban tree canopy. Impacts to riparian habitat, which include the removal of trees, will be mitigated through the allocation of credits at PUD's Stadium Mitigation Site, which is currently mapped almost entirely as Urban Tree Canopy. Project mitigation furthers the City's climate resiliency goals by offsetting Project impacts to habitat at a higher ratio than what was impacted and the Stadium Mitigation Site is maintained in preservation in perpetuity under agreements with various wildlife agencies so that it cannot be developed at a later point in time.