



THE CITY OF SAN DIEGO

MITIGATED NEGATIVE DECLARATION

Project No. 652296
SCH No.: 2020120403

SUBJECT: SEWER-STORM DRAIN GROUP JOB 828

The project proposes a Site Development Permit for impacts to environmentally sensitive land for the replacement of sewer pipe and storm drains through Switzer Canyon Open Space and the Balboa Park Golf Course. The project includes installation and replacement of approximately 9,008 linear feet (LF) of 8-inch, 12-inch, and 15-inch sewer main, sewer laterals, sewer lateral replumbing, installation and replacement of 38 manholes, street resurfacing and curb ramps. The project also includes replacement of three existing storm drain facilities which collect runoff and discharge into Switzer Canyon, and construction of an energy dissipator at the end of each facility at the canyon floor. The project will construct 365 LF of 18-inch reinforced concrete pipe (RCP) storm drain, inlets, cleanouts, concrete anchor, curbs, gutter, sidewalk replacement, and cross gutter replacement. The project is within developed right of way and land designated as Single-Family Residential (RS-1-1) and Open Space. The project is located within the Burlingame Historic District and within the Multi-Habitat Planning Area (MHPA) in the North Park, Greater Golden Hill, and Balboa Park Community Plan Areas, in Council District 3. Applicant: City of San Diego Engineering and Capital Projects Department.

UPDATE: March 18, 2021.

Revisions have been made to this document when compared to the draft Mitigated Negative Declaration (MND). More specifically, clarification has been made to the project access discussion in the Biology section of the Initial Study Checklist. In accordance with the California Environmental Quality Act (CEQA), Section 15073.5(c)(4), the addition of new information that clarifies, amplifies, or makes insignificant modifications does not require recirculation as there are no new impacts and no new mitigation identified. An environmental document need only be recirculated when there is the identification of new significant environmental impacts or the addition of a new mitigation measure required to avoid a significant environmental impact. The text modifications within the final environmental document do not affect the environmental analysis or conclusions of the draft MND.

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 area(s): **Biological Resources**. Subsequent revisions in 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 potentially significant environmental effects previously identified, 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 (MMRP):

A. GENERAL REQUIREMENTS

Plan Check Phase (prior to permit issuance)

1. Prior to the issuance of a Notice To Proceed (NTP) for a subdivision, or any construction permits, such as Demolition, Grading or Building, or beginning any construction related activity on-site, the Development Services Department (DSD) Director's Environmental Designee (ED) shall review and approve all Construction Documents (CD), (plans, specification, details, etc.) to ensure the MMRP requirements are incorporated into the design.

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:

<https://www.sandiego.gov/development-services/forms-publications/design-guidelines-templates>

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

5. SURETY AND COST RECOVERY – The Development Services Director or City Manager may require appropriate surety instruments or bonds from private Permit Holders to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

Post Plan Check (After permit issuance/Prior to start of construction)

6. PRE-CONSTRUCTION MEETING IS REQUIRED PRIOR TO BEGINNING ANY WORK ON THIS PROJECT.

The PERMIT HOLDER/OWNER is responsible to arrange and perform this meeting by contacting the CITY RESIDENT ENGINEER (RE) of the Construction Management and Field Engineering Division and City staff from MITIGATION MONITORING COORDINATION (MMC). Attendees must also include the Permit holder's Representative(s), Job Site Superintendent and the following consultants:

Qualified Biologist

Note:

Failure of all responsible Permit Holder'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 call **RE and MMC at 858-627-3360**

7. MMRP COMPLIANCE: This Project, Project Tracking System (PTS) #652296 and /or Environmental Document # 652296, shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the DSD's Environmental Designee (MMC) and the City Engineer (RE). The requirements may not be reduced or changed but may be annotated (i.e. to explain when and how compliance is being met and location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (i.e., specific locations, times of monitoring, methodology, etc.).

Note:

Permit Holder's Representatives must alert RE and MMC if there are any discrepancies in the plans or notes, or any changes due to field conditions. All conflicts must be approved by RE and MMC BEFORE the work is performed.

8. OTHER AGENCY REQUIREMENTS: Evidence of compliance with all other agency requirements or permits shall be submitted to the RE and MMC for review and acceptance prior to the beginning of work or within one week of the Permit Holder obtaining documentation of those permits or requirements. Evidence shall include copies of permits, letters of resolution or other documentation issued by the responsible agency.

***United States Army Corps of Engineers 404 Authorization
Regional Water Quality Control Board 401 Certification
California Fish and Wildlife Section 1600 Permit***

9. MONITORING EXHIBITS

All consultants are required to submit a monitoring exhibit to RE and MMC. The monitoring exhibit shall be a 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 of how the work will be performed shall be included.

10. OTHER SUBMITTALS AND INSPECTIONS:

The Permit Holder/Owner's representative shall submit all required documentation, verification letters, and requests for all associated inspections to the RE and MMC 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
Final Approval	Request for Final Approval	1 week after request

B. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

BIOLOGICAL RESOURCES

Prior to Construction Prior to the start of construction, the owner/permittee shall demonstrate to the satisfaction of MMC that the following mitigation measures have been satisfied:

BIO-1: Direct Impacts to Sensitive Vegetation Communities To mitigate for direct impacts to sensitive vegetation communities, the following mitigation would be required based on the City's mitigation ratios (City of San Diego 2018).

Vegetation Community	Tier	Impacts (acres)	Impact Location	Ratios*	Mitigation Required
<i>PUD Sewer Line</i>					
Coast Live Oak Woodland	I	0.021	MHPA	2:1	0.042
		0.037	Outside MHPA	1:1	0.037
Scrub Oak Chaparral	I	0.041	MHPA	2:1	0.082
		0	Outside MHPA	1:1	0
Chaparral/Coastal Sage Scrub	II	0.070	MHPA	1:1	0.070
		0.015	Outside MHPA	1:1	0.015
Diegan Coastal Sage Scrub	II	0.208	MHPA	1:1	0.208
		0.042	Outside MHPA	1:1	0.042

Sub Total PUD		0.434			0.496
TSW Storm Drain					
Chaparral/Coastal Sage Scrub	II	0.067	MHPA	1:1	0.067
		0.057	Outside MHPA	1:1	0.057
Diegan Coastal Sage Scrub	II	0.139	MHPA	1:1	0.139
		0.029	Outside MHPA	1:1	0.029
Sub Total TSW		0.292			0.292

*Mitigation would occur within the MHPA

Mitigation for all PUD impacts to Tier I upland habitat (0.161 acre) and Tier II upland habitat (0.335 acre) will occur through credit purchases at the City's Otay (Goat Mesa) Mitigation Site and the City's Marron Mitigation Site, respectively. Mitigation for all TSW impacts to Tier II upland habitat (0.292 acre) will occur through payment into the City's Habitat Acquisition Fund (HAF) in accordance with the City's Biology guidelines (2018). The total resulting mitigation required for direct project impacts is a 0.292-acre equivalent contribution to the HAF plus a ten percent (10%) administrative fee.

BIO-2: Biologist Verification The owner/permittee shall provide a letter to the City's Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist) as defined in the City of San Diego's Biological Guidelines (2018), has been retained to implement the project's biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project.

BIO-3: 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.

- 1. Biological Documents** - The Qualified Biologist shall submit all required documentation to MMC verifying that any special mitigation reports including but not limited to, maps, plans, surveys, survey timelines, or buffers are completed or scheduled per City Biology Guidelines, Multiple Species Conservation Program (MSCP), Environmentally Sensitive Lands Ordinance (ESL), project permit conditions; California Environmental Quality Act (CEQA); endangered species acts (ESAs); and/or other local, state or federal requirements.
- 2. 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/MMC. The BCME shall include a site plan, written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule. The BCME shall be approved by MMC and referenced in the construction documents.

BIO-4: Avian Protection Requirements - To avoid any direct impacts to the coastal California gnatcatcher and avian species identified as a listed, candidate, sensitive, or special status

species in the MSCP, removal of habitat that supports active nests in the proposed area of disturbance 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 10 calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the pre-construction survey to City DSD for review and approval prior to initiating any construction activities. If nesting birds are detected, a letter report or mitigation plan 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 or mitigation plan shall be submitted to the City for review and approval and implemented to the satisfaction of the City. The City's MMC Section and Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction.

BIO-5: 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.

BIO-6: 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

BIO-75: 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. Biological monitoring shall occur within designated areas during critical times such as vegetation removal, the installation of best management practices (BMPs), and fencing to protect native species, and to ensure that all avoidance and minimization measures are properly constructed and followed.

The Qualified Biologist shall document field activity via the Consultant Site Visit Record (CSV). The CSV shall be e-mailed to MMC 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.

BIO-86: 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

BIO - 97: 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 ADD/MMC within 30 days of construction completion.

VI. PUBLIC REVIEW DISTRIBUTION:

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

Federal Government

U.S. Fish & Wildlife Service

State of California

State Clearinghouse

California Department of Fish and Wildlife

City of San Diego

Mayor's Office

Councilmember Ward - District 3

City Attorney's Office

Development Services Department

Jamie Kennedy, EAS

Karen Howard, Project Management

Philip Lizzi, Planning

Noha Abdelmottaleb, Engineering

Kreg Mills, Geology

Sam Johnson, MMC

Engineering & Capital Projects Department

Sabeen Cochinwala

Peter Fogec

Parks and Recreation Department

Shannon Scoggins

Planning Department

Susan Lowery-Mendoza, Balboa Park Committee Staff

Bernard Turgeon, Community Planner

Other Interested Parties:

Kathy Vandenheuvel, Chair Greater Golden Hill Community Planning Group
Aria Pounaki, Chair North Park Community Planning Group
Sierra Club
San Diego Audubon Society
Mr. Jim Peugh
California Native Plant Society
Bill Mayor
Matty Reyes

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.
- (x) 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 draft Mitigated Negative Declaration, the Mitigation, Monitoring and Reporting Program and any Initial Study material may be reviewed online at www.sandiego.gov/ceqa, or purchased for the cost of reproduction.



Jamie Kennedy
Senior Planner
Development Services Department

December 22, 2020

Date of Draft Report

March 18, 2021

Date of Final Report

Analyst: Jamie Kennedy

Attachments:

Initial Study Checklist
Figure 1: Project Location
Figure 2: Project Components and MHPA

Comment Letter A

To: DSDEAS@sanidiego.gov

Subject: Sewer-Storm Drain Group Job 828, Project No. 652296

Below are comments on the Mitigated Negative Declaration (MND) for Sewer-Storm Drain Group Job 828, Project No. 652296.

1) Storm Drain Impact on Aesthetics

- A-1 a) Page 10 of the MND describes 8-10 feet of rip-rap style dissipaters, whereas the MND on Page 28 states that SDO-105 concrete dissipater will be used. Please clarify the structure of the dissipater that will be specified: SDO-104, SDO-105 (as described in the San Diego Standard Drawings for Public Works Construction 2016), or some other.
- A-2 b) We are not in favor of the SDO-105 in an open space park, since the chain-link fence and large amount of concrete are visually intrusive. The large amount of concrete will attract graffiti, as shown in the attached photo (taken near the Grape Street Dog Park). This is an unmitigated impact to Aesthetics. We request that the department investigate alternatives that reduces this impact, such as using the rip-rap style of dissipater.
- A-2 c) In addition, we have witnessed standing water in an SDO-105 style dissipator in Richmond St. canyon just east of 163. This is a public health liability, given the presence and increasing frequency of mosquito-borne disease in San Diego.



2) Storm Water Increase and Stream Bed Improvement

- A-3 a) We have identified an opportunity for on-site mitigation based on the impact to Biological Resources. This opportunity will increase the amount of land in Switzer Canyon with the ability to support perennial vegetation.
- A-3 b) The stream bed in Switzer is highly incised in many places because of high stormwater flow from surrounding impervious development. This plan will increase the capacity of storm water drains

A-3
(cont)

into the stream bed and will further increase this impact but doesn't appear to take into consideration the effect on soil on the stream banks.

- c) We request an update to the MND to include managing this increased storm water flow to preserve the stream bed and access paths.
- d) For example, there is an opportunity to install check dams (also known as rock-drop structures) on the project site and in other places in the canyon that will keep the soil from being washed downstream. This will preserve the utility access paths.
- e) In addition, this will raise the water table and allow more extensive riparian forest. This more extensive forest can be considered a positive for the City's Climate Action Plan.
 - i) For example, below are before and after images of successful stream bed restoration in Diabold by the Campo Kumeyaay Nation (as communicated by Michael Connolly, Resource Ecologist).

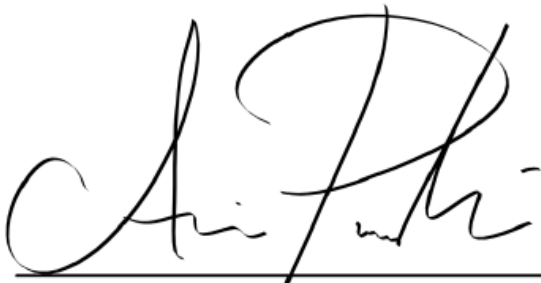


- ii) For example, a project to install drop structures to rehabilitate the incised creek channel has been approved for Maple Canyon (Project 157439).
- f) We request that the MND include a project of this nature to provide on-site mitigation.

3) **Impact to Biological Resources**

- a) The MND states that vehicles will predominantly use the current utility access path and therefore there is no impact, and also that vegetation (including Palmer's sagewort and wart-stemmed Ceanothus) on the path will be killed (page 18). These are confusing and contradictory statements. Please indicate on a map where the impacts will take place and whether there will be any widening of the current utility access path.
- b) The current access paths for utility maintenance are designed for "low-impact canyon-proficient vehicles" (Council Policy 400-13) and are no more than about 8 feet wide. Since this project appears to require access by large utility vehicles to each manhole in order to complete the trenchless excavation required for the new sewer, it's likely that vegetation along the sides of this path (and around the manholes) will be damaged and be made much wider. Please update the MND to calculate the mitigation required for damage to the habitat from *widening* the access path.
- c) The Biological Resources Report table of contents refers to a Draft Revegetation Plan in Appendix F, which is not attached. Please include this Appendix in the public materials.

Thank you for consideration of these comments.



Aria Pounaki
North Park Planning Committee, Chair
(Signing on behalf of the North Park Planning Committee)



Date



1/21/21

Carrie Schneider for Friends of Switzer Canyon:

Robert Matlock
Chris Drayer
Barbara Morton
Mary Severine
Christian Deck
John Gavares
Pete di Girolamo
Susan Seiguer

Libby Brydolf
Betty Ball
Cara D'Angelo
Sheila Kirschenbaum
Wendy Hardy
Rick Hardy
Jen Sabo Spencer
Martha Wild

Comment Letter B



San Diego County Archaeological Society, Inc.

Environmental Review Committee

28 December 2020

To: Ms. Jamie Kennedy
Development Services Department
City of San Diego
1222 First Avenue, Mail Station 501
San Diego, California 92101

Subject: Draft Mitigated Negative Declaration
Sewer-Storm Drain Group Job 828
Project No.652296

Dear Ms. Kennedy:

I have reviewed the subject DMND on behalf of this committee of the San Diego County Archaeological Society.

B-1

Based on the information contained in the DMND and Laguna Mountain Environmental's cultural resources report for the project, we agree that no significant impacts to cultural resources are likely to result. Hence, we also agree that no cultural resources mitigation measures are necessary.

SDCAS appreciates the opportunity to participate in the City's environmental review process for this project.

Sincerely,

A handwritten signature in black ink, appearing to read "James W. Royle, Jr.", is written over the typed name.

James W. Royle, Jr., Chairperson
Environmental Review Committee

cc: Laguna Mountain Environmental
SDCAS President
File

Comment Letter C

From: [Kate Callen](#)
To: [DSD EAS; Kennedy, Jamie](#)
Cc: info@northparkplanning.org; [Darsey, Ryan](#)
Subject: [EXTERNAL] Project Name: Sewer-Storm Drain Group Job 828, Project No. 652296
Date: Thursday, January 21, 2021 5:52:13 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

I am writing on behalf of the SoNo Neighborhood Alliance, a community empowerment nonprofit serving North Park and Golden Hill/South Park, to raise serious objections to the city's irresponsible plans for carrying out this project on the cheap — which will only entail terrible costs over time — and the city's deliberate disregard for the projected environmental degradation of Switzer Canyon, a treasured natural resource for both our communities.

At last night's North Park Planning Committee, Carrie Schneider of Friends of Switzer Canyon gave an excellent presentation about the city's refusal to take reasonable steps, like using "rip rap" energy dissipators that would help nurture the canyon instead of eroding it. Her remarks were followed by an incisive discussion by the NPPC Board of their unsuccessful attempts to get information and explanations from DSD about key aspects of the project, like the decision to invest in off-site (Otay Mesa, 20 miles away) mitigation when the city has admitted that the project's on-site negative impact on canyon vegetation will be "significant."

I would summarize the major points here, but frankly, you've already heard them. Our communities are only too aware that City Hall has no interest in our input because its policies are rooted in short-term thinking and are devised behind closed doors.

But I'm writing anyway because we care too much about natural community resources to give up on Switzer Canyon. The prolonged indifference of our local government to neighborhood priorities has forced us to work together more effectively as citizen-activists. It may take a while for us to bring about change, but we have time and resolve.

Thanks for considering this comment,
Kate Callen, Co-Founder, SoNo Neighborhood Alliance

C-1

Comment Letter D

From: [Aria Ryan](#)
To: [DSD EAS](#)
Subject: [EXTERNAL] Sewer-Storm Drain Group Job 828, Project No. 652296
Date: Thursday, January 21, 2021 4:14:54 PM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

Hello,

- D-1 Below I have tried to capture the sentiment of the community and board as disseminated to the North Park Planning Committee (NPPC) on the Mitigated Negative Declaration (MND) for Sewer-Storm Drain Group Job 828, Project No. 652296:
- D-2 1. The community feels that the use of concrete dissipators in lieu of rip-rap is an unacceptable aesthetic impact of the project. Alternatives to the concrete dissipator options were not exhaustively investigated and the community would like further study on this.
- D-3 2. It is clear from community input that off-site vegetation mitigation is an unacceptable mitigation effort and would strongly prefer on-site mitigation to the greatest extent possible.
- D-4 3. There is a fear that there is an understated risk to existing habitat and vegetation from construction equipment. It is important to accurately reflect and prepare for these risks to minimize impact to the natural environment in Switzer Canyon.
- D-5 4. This project should coincide with mandates in the city's Climate Action Plan to enhance riparian habitat where possible. A more comprehensive review of this project could yield strategies that could complement the storm drain replacement and would also help raise the water table.
- D-6 On behalf of the NPPC we thank you for your consideration of these comments. A more comprehensive analysis by Friends of Switzer Canyon also has our signature and support and we urge you to investigate these concerns fully.

Sincerely,

Aria Pounaki
Chair
NPPC

Comment Letter E

From: [Elizabeth Brydolf](#)
To: [DSD EAS; Gloria, Todd \(External\); Councilmember Stephen Whitburn](#)
Subject: [EXTERNAL] Sewer-Storm Drain Group Job 828, Project No. 652296
Date: Wednesday, January 20, 2021 11:53:59 AM

****This email came from an external source. Be cautious about clicking on any links in this email or opening attachments.****

To Whom It May Concern:

E-1

I am a longtime resident of North Park and frequent user of urban canyons throughout the city. I realize the city needs to maintain and replace its sewer and storm drain infrastructure and appreciate the reliable service provided to city residents. However, I feel the department has not been responsive to neighborhood suggestions and comments. City staff responses at North Park Community Planning Group meetings seem to be focused on why the city CAN'T meet requests from residents rather than investigating how the city COULD meet our concerns. The Mitigated Negative Declaration is another example of this lack of response. While thorough in its review of the Switzer Canyon habitat, the MND does not examine alternatives to the project as designed, including onsite mitigation that could help the city meet its climate action plan as well as reduce pollutants flowing from storm drains into the Pacific. Since the city plans significant excavation and construction in Switzer, why not take this opportunity to improve degraded riverbed, to design improvements to build up and restore topsoil, improve groundwater absorption and replant a native riparian habitat that would help absorb carbon and toxins? I am requesting a full environmental impact report that examines potential opportunities to actually improve the environment rather than focus on the easiest ways of mitigating damage due to the construction project. Many cities have adopted less concrete-intensive approaches to slowing water flow and encouraging the recharging of groundwater. I also would like to point out that Appendix F, the revegetation plan, is not included in the report offered to the public. Please provide that and offer additional response time.

E-2

E-3

This project represents an opportunity for the city to take a broader look at the environmental and recreational/open space role of its urban canyons that have become so important to residents during the pandemic. Coordinating infrastructure improvement planning with other city departments would produce a multi-pronged approach that could provide multiple benefits to both the city budget and the quality of life of its residents. Well-vegetated, healthy canyon habitats also attract tourists (try an internet search to find many tourist recommendations for San Diego canyon explorations), another economic benefit to the city.

Thank you for considering my comments and concerns.

Sincerely,

Libby Brydolf
2419 Bancroft St.
San Diego, CA 92104

Response To Comments, Sewer and Storm Drain Group 828

A. Carrie Schneider- Friends of Switzer Canyon; Aria Pounaki, Chair North Park Planning Committee

A-1. Page 10 of the MND describes rip rap extending from the end of each energy dissipater, rather than the design of the dissipater itself. See pages C-15, C-16, and C-17 of the development plans for details on the rip rap cutoff wall and energy dissipators. Per SDD-105 note #8, the rip rap and aggregate base cutoff wall is required at the end of rock apron. Detail 2 on sheet C-20 for the Rip Rap Cutoff Wall detail states, "Rip Rap and Aggregate Subbase per SDD-105 and Rip Rap Data Table on Plan Sets."

SDD-105 is the design of the concrete dissipater recommended in the Drainage Study (CValdo Corporation, 2019). Selection of the most appropriate energy dissipator for use on a project site requires the consideration of a number of factors. The City has considered SDD-104, and determined that SDD-105 is the most appropriate for the project. Deviation from the standard SDD-105 is not approved by Transportation and Storm Water Department as SDD-104 requires more maintenance, a permanent vehicle access path, and can promote vegetation growth within the dissipator which can have an impact on the function of the system. Additionally, designing a rip rap dissipator per SDD-104 would result in an area approximately three times larger, due to the velocity and volume of the water in the drainage area. This design would result in a greater biological impact to sensitive habitat.

The addition of standard concrete dissipators would not exceed the City's significance thresholds for visual effects and neighborhood character. The project is located in the City of San Diego in an urban environment surrounded by concrete structures. The project would not block public views, significant visual landmarks, or scenic vistas. The project does not contrast with neighborhood character or architecture and does not include any project features with excessive height, bulk, signage or architectural projections. The project would not significantly alter the project landform through grading more than 2,000 cubic yards of earth per acre. The project has no development features that exceed the City's thresholds for visual impact. The project meets City standard drawing requirements, is consistent with the zone, does not include walls greater than 50 feet in length, is not a large project resulting in a monotonous visual environment, and does not include shoreline protection. The project would not emit light/glare. No significant impact to aesthetics would occur.

A-2. The project's Drainage Study (CValdo Corporation, 2019) did not identify any potential significant hydrology impacts. The SDD-105 dissipators are designed to conform to the City's Drainage Design Manual, and they are necessary to reduce the velocity of flow to non-erosive levels. The SDD-105 alternative is the required design by the Transportation and Storm Water Department, which maintains the City's storm drain system.

The project would not exceed the City's significance thresholds for Health and Safety, as discussed in Section IX of the Initial Study (IS) Checklist, Hazards and Hazardous materials. The City would implement standard procedures including, but not limited to, the 2018 edition of the City's Standard Specifications For Public Works Construction ("WHITEBOOK"), which describes procedures regarding freestanding water and placing concrete (303-5.3), revegetation (802-3.8), and sediment control BMPs (1001-2.5). A properly operating SDD-105 will not hold standing water. Inspections are completed during construction to ensure proper drainage. These procedures would ensure potential impacts to health and safety resulting from the project are less than significant. The dissipator referenced located at Richmond St east of State Route 163 is outside the scope of the project.

A-3. The project proposes infrastructure improvements within sensitive upland vegetation communities. These impacts are mitigated appropriately at existing City upland mitigation banks and the Habitat Acquisition Fund as described in Section IV of the IS Checklist. Based on the information provided in this comment, it appears wetland creation/restoration is proposed. The project would not result in significant wetland impacts, thus the upland mitigation provided is appropriate and in accordance with the City of San Diego Biology Guidelines, "Mitigation for Upland Impacts."

Please note temporary impacts to all areas of disturbance will be revegetated on-site with native Diegan Coastal Sage Scrub container plants and hydroseed. Following installation and a 120-day plant establishment period, the revegetation areas shall be maintained and monitored for 25 months in accordance with the latest edition of the City's "WHITEBOOK," Land Development Code, Landscape Standards, and Sewer Design Guidelines. The BRR has been updated to include the Revegetation Plan as Appendix F.

The proposed drop structures are outside of the scope of the project. The project would not result in a significant impact to hydrology as described in Section X of the IS Checklist, Hydrology and Water Quality. Revegetation and the incorporation of standard design energy dissipators would ensure impacts with respect to hydrology and soil erosion are less than significant. Utility access paths are preserved and maintained in accordance with the City's Canyon Sewer Cleaning Program/Long-Term Canyon Sewer Maintenance Program and associated Program EIR. No hydrology mitigation is required.

The City's Climate Action Plan (CAP) Consistency Checklist was adopted by City Council on July 12, 2016. Compliance with the CAP Checklist is the City of San Diego significance threshold for greenhouse gas (GHG) emissions. The project has demonstrated consistency with the City of San Diego Climate Action Plan through the approved CAP Checklist.

Design features and mitigation measures within the MND appropriately reduce impacts to less than significant after mitigation. No additional on-site mitigation measures are required for the project.

A-4. All upland habitat impacts are described in Section IV, Biological Resources of the IS Checklist. These impacts are further broken down and explained in detail in the referenced "Sewer and Storm Drain Group Job 828 Project Biological Resources Report" (BRR). The BRR discloses the impacts to access paths. See section 6.2.1.1, Vegetation Communities/Land Uses; Table 5, and Figures 3 a-d of the BRR. All project impacts are appropriately disclosed in the BRR and fully mitigated.

Clarification text has been added to Section IV Biological Resources of the IS Checklist to distinguish existing previously impacted access areas (environmental baseline) from the project's access impacts.

A-5. The BRR has been updated to include the Revegetation Plan as Appendix F.

B. James Royle - San Diego County Archaeological Society

B-1. Comments noted. No further response is required.

C. Kate Callen - SoNo Neighborhood Alliance

C-1. Please see Responses A-1, A-2, and A-3 regarding energy dissipators, on-site revegetation, and biological mitigation measures.

D. Aria Pounaki, Chair, North Park Planning Committee

D-1. Introductory comment noted. No response is required.

D-2. Please see response A-1.

D-3. Please see response A-3.

D-4. Please see response A-4.

D-5. Please see response A-3.

D-6. Conclusion comment noted. The comment refers to Comment Letter A; please see responses to Comment Letter A provided.

E. Libby Brydolf

E-1. Please see response A-1 and A-3. The City completed the IS Checklist to determine if the project may have a significant effect on the environment, which concludes that once mitigation measures in the MND are incorporated, there is no substantial evidence that the project or any of its aspects may cause a significant effect on the environment. One purpose of the Initial Study is to enable an applicant or Lead Agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a Negative Declaration. Pursuant to Section 15063 of the CEQA Guidelines, an EIR is not required for the project. Consideration and discussion of alternatives to the proposed project is not required for an MND under CEQA.

E-2. The BRR has been updated to include the Revegetation Plan as Appendix F.

E-3. The comment does not address the adequacy of the environmental document; therefore, no response is required.

INITIAL STUDY CHECKLIST

1. Project title/Project number: Sewer- Storm Drain Group Job 828/652296
2. Lead agency name and address: City of San Diego, 1222 First Avenue, MS-501, San Diego, California 92101
3. Contact person and phone number: Jamie Kennedy/ (619) 446-5379
4. Project location: The project is within developed right of way and land designated as single-family residential (RS-1-1) and Open Space. The project is located within the Burlingame Historic District and within the Multi-Habitat Planning Area (MHPA) in the North Park, Greater Golden Hill, and Balboa Park Community Plan Areas, in Council District 3. The site is located on the USGS 7.5-minute series Point Loma quadrangle. The project is outside of the Coastal Overlay Zone. The project is bound approximately by Pershing Drive to the west, Quince Street to the north, 32nd Street to the east, Russ Boulevard to the south.

See attached vicinity and location maps.

5. Project Applicant/Sponsor's name and address: City of San Diego Engineering & Capital Projects Department, 525 B Street, San Diego, CA 92101
6. General/Community Plan designation: City of San Diego Public Right-of-Way (PROW), as well as in the Single Family Residential and Open Space general and community plan designations
7. Zoning: The proposed project is within the Single Family Residential (RS-1-1) zone and developed public right-of-way. The project will not result in a change in any zone and is consistent with all underlying zoning regulations.
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 project proposes a Site Development Permit for impacts to environmentally sensitive land for the replacement of sewer pipe and storm drains through Switzer Canyon Open Space and the Balboa Park Golf Course. The project includes replacement of approximately 9008 linear feet (LF) of sewer main and installation of new 8-inch, 12-inch, and 15-inch sewer main, sewer laterals, sewer lateral replumbing, installation and replacement of 38 manholes, street resurfacing, curb ramps, and replacement of 365 LF of 18-inch storm drain (reinforced concrete pipe, or RCP), new inlets, cleanouts, concrete anchor, curbs, gutter, sidewalk replacement, and cross gutter replacement.

Most of the sewer will be installed using trenchless construction methods. Conventional cut-and-cover construction methods will be employed where the sewer follows the existing streets in the North Park area. The sewer will be installed in a steel casing where the pipe

crosses below 30 Street. Soil cover above the sewer will typically vary from 3-feet to 15-feet, with approximately 65 feet of soil cover where the pipe crosses below 30th Street.

It is anticipated that the storm drain replacement will be performed using conventional cut-and cover construction methods. The storm drain segments will be replaced with 18-inch diameter RCP with three to four feet of soil cover above the pipe crest.

Following project sewer and storm drain work, temporary construction impacts will be revegetated with Diegan Coastal Sage Scrub habitat container plants and hydroseed mix with intent to meet the erosion control requirements in the Landscape Standards. The revegetated habitat would provide a higher-value habitat than the impacted habitat. All revegetated areas will be required to comply with a 25-month monitoring, maintenance, and reporting program to ensure the revegetation areas meet a minimum 80 percent container plant survival rate and 50% native plant material cover at the end of 25-months. Within access paths the performance standard would be no erosion.

9. Surrounding land uses and setting:

The TSW storm drain component includes replacement of three (3) existing storm drain facilities which collect runoff from city streets on the mesas above and discharge into Switzer Canyon. The storm drain facilities are located at the dead ends of the following streets: 1) Maple Street east of 28th Street; 2) Olive Street east of 30th Street; and 3) Palm Street west of 32nd Street. Each facility will include a new inlet at street level and a discharge structure/energy dissipater at or near the canyon floor with rip rap extending from the end approximately eight to ten feet.

Most of the new sewer construction is within the limits of paving on Palm Street, Olive Street, and Nutmeg Street, west of 32nd Street, and will be constructed using open trench methods. The upsized sewer located within the limits of Switzer Canyon will be constructed using trenchless methods to minimize disturbance within the canyon. Most of the manholes that are to be abandoned occur within the golf course. To access each of the manholes in the scope of work, there are some existing cleared paths through Switzer Canyon which provide access to sewer manholes and will remain after project completion; these disturbed paths will be used for construction access and staging and can also be used for access to the delineated areas described in this report within and around Switzer Canyon. Construction storage will be located off site at a location to be determined by the construction contractor.

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

United States Army Corps of Engineers Section 404 Permit, California Regional Water Quality Control Board Section 401 Certification, and California Department of Fish and Wildlife Section 1600 Permit.

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?

The Lipay Nation of Santa Ysabel, Jamul Indian Village, and San Pascual Band of Mission Indians of Kumeyaay Nation Native American tribes which are traditionally and culturally affiliated with the project area have requested consultation with the City of San Diego pursuant to Public Resources Code section 21080.3.1. These tribes were notified of the opportunity to consult with the City of San Diego on the proposed project and responded that they do not have any comments for this project. Consultation began June 11, 2020 and concluded on July 11, 2020.

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.

<input type="checkbox"/>	Aesthetics	<input type="checkbox"/>	Greenhouse Gas Emissions	<input type="checkbox"/>	Population/Housing
<input type="checkbox"/>	Agriculture and Forestry Resources	<input type="checkbox"/>	Hazards & Hazardous Materials	<input type="checkbox"/>	Public Services
<input type="checkbox"/>	Air Quality	<input type="checkbox"/>	Hydrology/Water Quality	<input type="checkbox"/>	Recreation
<input checked="" type="checkbox"/>	Biological Resources	<input type="checkbox"/>	Land Use/Planning	<input type="checkbox"/>	Transportation/Traffic
<input type="checkbox"/>	Cultural Resources	<input type="checkbox"/>	Mineral Resources	<input type="checkbox"/>	Tribal Cultural Resources
<input type="checkbox"/>	Energy	<input type="checkbox"/>	Noise	<input type="checkbox"/>	Utilities/Service System
<input type="checkbox"/>	Geology/Soils	<input type="checkbox"/>	Mandatory Findings Significance	<input type="checkbox"/>	Wildfire

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.
- ☐ 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 – Would the project:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Most of the proposed work on the sewer and storm drain systems would be below existing ground level and at ground level for manholes. Proposed concrete energy dissipaters at the downstream end of the storm drains would be no more than five feet above grade. All trenching for sewer pipes and storm drains would be filled to match the adjacent natural grade of the canyon and all ground disturbances would be re-vegetated with a native Diegan coastal sage scrub hydroseed mix and container plants. Therefore, the proposed project would have no significant impacts to scenic vistas, and no mitigation would be required.</p>				
b) Substantially damage scenic resources, including but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>The project would not damage any existing scenic rock outcroppings or historic buildings as none of these features are located within the boundaries of the proposed project. Furthermore, the project site is not located near a state scenic highway. See I. a), as well as V. a) for detail on historic resources. No impact would occur.</p>				
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>See answer to I. a) and I. b) above. No impact would occur.</p>				
d) Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<p>The project does not include any new or modified light sources such as new or replacement street lights, and the project would not utilize highly reflective materials. In addition, no substantial sources of light would be generated during project construction, as construction activities would occur during daylight hours. The project would also be subject to the City's Outdoor Lighting Regulations per Municipal Code Section 142.0740. No impact would occur.</p>				
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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Agency, to non-agricultural use?

The project would occur adjacent to and within a natural canyon and within paved public roads which are not zoned or mapped for agricultural use or farmland. In addition, agricultural land is not present in the vicinity of the project. No impact would occur.

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| b) Conflict with existing zoning for agricultural use, or a Williamson Act Contract? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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Refer to II. a). No impact would occur.

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|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 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))? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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The project would occur in and adjacent to a natural canyon and within paved public roads which are not designated as forest land or timberland. In addition, forest land and timberland are not present in the vicinity of the project. No impact would occur.

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| d) Result in the loss of forest land or conversion of forest land to non-forest use? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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Refer to II. c). No impact would occur.

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| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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The project does not propose a change in land use and would not result in the conversion of Farmland since no Farmland exists within, or in the vicinity, of the project boundaries. No impact would occur.

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

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| a) Conflict with or obstruct implementation of the applicable air quality plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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The proposed storm drain replacement would not involve any future actions that would generate air quality emissions as a result of the proposed use (e.g. vehicle miles traveled). However, emissions would occur during the construction phase of the project and could increase the amount of harmful pollutants entering the air basin. The emissions would be minimal and would only occur temporarily during construction. Additionally, the construction equipment typically involved in sewer/storm drain projects is small-scale and generates relatively few emissions. When appropriate, dust

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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suppression methods would be included as project components. As such, the project would not conflict with the region's air quality plan; impacts are less than significant and no mitigation is required.

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| b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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Refer to III. b). Impacts are less than significant and no mitigation is required.

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| c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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As described above, construction operations could temporarily increase the emissions of dust and other pollutants. However, construction emissions would be temporary and implementation of Best Management Practices would reduce potential impacts related to construction activities to below a level of significance. The project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under applicable federal or state ambient air quality standards. Impacts are less than significant and no mitigation is required.

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| d) Create objectionable odors affecting a substantial number of people? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Operation of construction equipment and vehicles could generate odors associated with fuel combustion. These odors would dissipate into the atmosphere upon release and would remain temporarily in proximity to the construction equipment and vehicles. Project odors would not affect a substantial number of people; thus, impacts are less than significant, and no mitigation is required.

IV. BIOLOGICAL RESOURCES – Would the project:

- | | | | | |
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| 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? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|-------------------------------------|--------------------------|--------------------------|

Direct Impacts

"Sewer and Storm Drain Group Job 828 Project Biological Resources Report" (BRR) was prepared June 26, 2020 by Rocks Biological Consulting. The BRR analyzed the direct and indirect impacts of the proposed project on the biological and jurisdictional resources located in the vicinity of the project.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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The proposed project will result in direct impacts to upland habitat which is summarized in the table below.

Vegetation Community	Tier	Impacts (acres)	Impact Location	Ratios*	Mitigation Required
<i>PUD Sewer Line</i>					
Coast Live Oak Woodland	I	0.021	MHPA	2:1	0.042
		0.037	Outside MHPA	1:1	0.037
Scrub Oak Chaparral	I	0.041	MHPA	2:1	0.082
		0	Outside MHPA	1:1	0
Chaparral/Coastal Sage Scrub	II	0.070	MHPA	1:1	0.070
		0.015	Outside MHPA	1:1	0.015
Diegan Coastal Sage Scrub	II	0.208	MHPA	1:1	0.208
		0.042	Outside MHPA	1:1	0.042
Sub Total PUD		0.434			0.496
<i>TSW Storm Drain</i>					
Chaparral/Coastal Sage Scrub	II	0.067	MHPA	1:1	0.067
		0.057	Outside MHPA	1:1	0.057
Diegan Coastal Sage Scrub	II	0.139	MHPA	1:1	0.139
		0.029	Outside MHPA	1:1	0.029
Sub Total TSW		0.292			0.292

*Mitigation would occur within the MHPA

Mitigation for all PUD impacts to Tier I upland habitat (0.161 acre) and Tier II upland habitat (0.335 acre) will occur through credit purchases at the City's Otay (Goat Mesa) Mitigation Site and the City's Marron Mitigation Site, respectively. Mitigation for all TSW impacts to Tier II upland habitat (0.292 acre) will occur through payment into the City's Habitat Acquisition Fund (HAF). HAF monies are used to purchase lands within the MHPA and are collected by the City's Facilities Financing Division. The total resulting mitigation required for direct project impacts is a 0.292-acre equivalent contribution to the HAF plus a ten percent (10%) administrative fee.

According to the project's BRR the project would impact 0.008 acres of mule fat scrub, which does not exceed the City of San Diego Significance Determination Thresholds (2018). Access would primarily occur on existing paths disclosed and mitigated through the City of San Diego *Canyon Sewer Cleaning Program and Long-Term Canyon Sewer Maintenance Program*. The project access path is an existing path that is cleared annually, and therefore is not considered a project impact. Mitigation for all new access impacts that will result from project implementation are described in Table 5 and Figures 3a-d of the BRR.

Approximately ten known individuals of Palmer's sagewort may be impacted during vegetation trimming and project work. However, per the project BRR, impacts would not be significant.

Six individuals of wart-stem ceanothus occur within the project sewer access path. Wart-stem ceanothus is an MSCP covered species; thus, take of the species is allowed for projects that comply with the City's MSCP implementing regulations. Per the MSCP Conditions of Coverage, "Revegetation efforts within appropriate habitats must include restoration of this species." Per the BRR, most of the path area that will be used to access project work areas is an existing access path that is cleared

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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annually and impacts on wart-stemmed ceanothus would be less than significant. Nevertheless, the project revegetation plans include revegetation of this species with 28 individuals.

One Belding's orange-throated whiptail was observed adjacent to the utilities access path that will be used during construction, and suitable habitat for the species occurs in the project area. No new edge effects that would threaten this species would be created as part of the project. Based on this species' ability to move away from active disturbance, project compliance with the MSCP, and the very small project impact area, impacts on Belding's orange-throated whiptail would be less than significant.

California gnatcatcher was documented within the project survey area. In order to ensure adequate protection for these species, project activities shall be conducted in accordance with nesting bird mitigation measures outlined in section V of this MND.

Cooper's hawk was documented circling above the site during biological surveys. In order to ensure adequate protection for this species, project activities shall be conducted in accordance with federal and state nesting bird regulations. With these measures in place, impacts on Cooper's hawk would be less than significant.

Implementation of the Mitigation and Monitoring Requirements identified in Section V of this Mitigated Negative Declaration (MND) would reduce potentially significant direct impacts to habitat and special status wildlife to a less than significant level. Section V also includes specific mitigation measures for potential impacts to the California gnatcatcher.

Indirect Impacts

Per the project's BRR, indirect impacts may occur from the construction of project features, including fugitive dust, noise, and erosion. However, the project will incorporate dust control, noise control, and erosion control measures including a Stormwater Pollution Prevention Plan. No significant indirect impacts would occur.

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| b) Have a substantial adverse effect on any riparian habitat or other 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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Refer to IV. a) regarding direct vegetation impacts. The proposed project will be required to obtain permits for work within US and state jurisdictional wetlands and non-wetland waters from the Army Corps of Engineers, Regional Water Quality Control Board, and California Department of Fish and Wildlife prior to project implementation. Impacts are less than significant, and no mitigation is required.

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| c) Have a substantial adverse effect on federally protected wetlands as defined by section 404 of the Clean Water Act (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Refer to IV. a) and b). Impacts are less than significant, and no mitigation is required.

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| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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Per the project's BRR, the project study area is not identified as an MSCP regional wildlife corridor. The open space park is isolated, with no adjacent native habitats. However, the habitat is a large, intact area of native habitat and serves as a local wildlife corridor and a 'stepping stone' corridor for avian species. The project does not propose any new barriers such as fencing or development that would preclude wildlife movement. Further, the project work would occur below ground and would result in no obstructions through this area. As such, no impacts on wildlife corridors would occur with project operations. In order to preserve sensitive plant species adjacent to project impacts (Figure 3), exclusion fencing is recommended during project construction activities. Temporary fencing would not be a significant impact to wildlife movement, and no mitigation is required.

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| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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The project is located within and adjacent to the MHPA and is therefore subject to the MSCP City of San Diego Subarea Plan MHPA Land Use Agency Guidelines. As a condition of SDP approval, the project will be required to implement the MHPA Land Use Adjacency Guidelines to ensure adverse effects to the MHPA do not result with project implementation. The project would comply with all local policies and ordinances protecting biological resources including satisfying mitigation requirements for impacts to California gnatcatcher in accordance with the City of San Diego Multiple Species Conservation Program and the City of San Diego Biology Guidelines. Impacts would be less than significant.

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| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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Refer to IV. a), b), and e). The project would not conflict with any local conservation plans including the MSCP City of San Diego Subarea Plan. As a condition of SDP approval, the project will be required to implement MHPA requirements including requirements to protect California Gnatcatcher. Impacts would be less than significant.

V. CULTURAL RESOURCES – Would the project:

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| a) Cause a substantial adverse change in the significance of an historical resource as defined in §15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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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

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

Archaeological Resources

"Archaeological Constraints Analysis for the Sewer Group 828 Geotechnical Testing Project" was prepared by Laguna Mountain Environmental, Inc. (January 29, 2018). The records search did not identify any cultural resources within or adjacent to the proposed geotechnical locations. Based on the locations of the geotechnical testing in active stream areas and existing streets, no impacts to cultural resources are anticipated. No impacts to cultural resources will result from geotechnical testing. Impacts to cultural resources eligible for the California Register will not occur. No impacts to cultural resources will result from the geotechnical investigation.

The archaeological evaluation of the geotechnical work was reviewed by City staff's qualified archaeologist and determined to suffice for the archaeological survey. Switzer Canyon was evaluated in the Archaeological Constraints Analysis, and it was determined that no resources existed based on hydrology within the canyon. Based on the conclusions and recommendations of the Archaeological Constraints Analysis, the project would have a less than significant impact on archaeological resources and no mitigation is required.

Built Environment

The project scope will occur within the northwest boundary of the Burlingame Historic District, HRB #526. However, the proposed work will not impact any designated resources and all work in this area will be done through trenchless technology with a manhole being installed in the Switzer Canyon area. Burlingame Drive may be used for construction access or staging. No excavation will occur on Burlingame Drive. The proposed work will not impact any designated historical resources and will be consistent with the Secretary of Interior Standards. Therefore, no mitigation is required.

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| b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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See response to V. a). Impacts are less than significant, and no mitigation is required.

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| c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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The project site is underlain by fill materials; wash deposits; young colluvial deposits; very old paralic deposits; and the San Diego Formation as indicated by the project's geotechnical investigation (Updated Report of Geotechnical Investigation Sewer and Storm Drain Group Job 828 Replacement Project, Allied Geotechnical Engineers, Inc., April 10, 2020). The City of San Diego Land Development

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
<p>Manual General Grading Guidelines for Paleontological Resources indicate that the San Diego Formation has a high potential for the discovery of paleontological resources. In addition, there are recorded fossil recovery sites in the vicinity of the project site as shown on City of San Diego Paleontological Resource Maps, located in the DSD Geology Library.</p> <p>San Diego Municipal Code Section 142.0501 (Paleontological Resources Requirements for Grading Activities) requires paleontological monitoring for grading that involves 1,000 cubic yards or greater and 10 feet or greater in depth, in a High Resource Potential Geologic Deposit/Formation/Rock Unit, grading on a fossil recovery site, or within 100 feet of the mapped location of a fossil recovery site.</p> <p>Since this project is located within 100 feet of the mapped location of a fossil recovery site, and within a unit with high paleontological resource potential, paleontological monitoring will be required during project grading. Impacts are less than significant with monitoring incorporated, and no mitigation measures are required.</p>				
d) Disturb and human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>No cemeteries, formal or informal, have been identified on or adjacent to the project site. While there is a possibility of encountering human remains during project construction activities, if remains are found monitoring would be required. In addition, per CEQA Section 15064.5(e), the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5), if human remains are discovered during construction, work would be required to halt in that area and no soil would be exported off-site until a determination could be made regarding the provenance of the human remains via the County Coroner and other authorities as required. Compliance with state regulations would ensure impacts are less than significant and no mitigation required.</p>				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>During project construction, the Air Resources Board regulates idling for commercial motor vehicles to reduce unnecessary consumption of energy under 13 CCR § 2485, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. Locally, Administrative Regulation 90.72 Motive Equipment Idling Reduction Policy applies to all City employees operating motive equipment owned or leased by the City of San Diego, which states idling of motive equipment shall be prohibited unless "mission necessary". Through implementation of these measures, energy consumption during construction would be less than significant.</p> <p>The replacement, rehabilitation, and installation of water and storm drain infrastructure would result in minimal energy utilization during operation. Energy usage may incrementally increase at local pump stations, but no work would occur at pump stations as a result of the project. Energy impacts, if any, would be minimal and less than significant. No mitigation is required.</p>				
b) Conflict with or obstruct a state or local	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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plan for renewable energy or energy efficiency?

The project is consistent with the General Plan and Community Plan's underlying land use and zoning designations, and appropriately implements the Climate Action Plan checklist. See also section VIII, Greenhouse Gas Emissions. Because the project does not conflict with or obstruct the Climate Action Plan, no impact would occur.

VII. GEOLOGY AND SOILS – Would the project:

- a) Expose people or structures to 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.

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"Updated Report of Geotechnical Investigation Sewer and Storm Drain Group Job 828 Replacement Project" was prepared by Allied Geotechnical Engineers in April 10, 2020. The Texas Street fault crosses the project alignment in a north-south direction near 28th Street (City of San Diego Seismic Safety Study, 2008). The fault is classified in the study as "potentially active, inactive, presumed inactive, or activity unknown". However, the Texas Street fault is not mapped by Kennedy and Tan (2008) and is generally considered by most local experts to be inactive. There are no known (mapped) active or potentially active faults crossing the project alignment. Therefore, the potential for fault ground rupture and ground lurching at the site is considered insignificant. In addition, the project would utilize proper engineering design and standard construction practices in order to ensure that potential impacts in this category based on regional geologic hazards would remain less than significant. Therefore, risks from rupture of a known earthquake fault would be less than significant.

- ii) Strong seismic ground shaking?

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See VII. a) i) above.

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

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The project's geotechnical investigation determined that the project site is underlain by very dense to hard formational material which is considered to have a very low to negligible liquefaction potential. No mitigation is required.

- iv) Landslides?

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The project's geotechnical investigation determined that project site is not located on or below any known (mapped) ancient landslides; therefore, land sliding is not considered a significant risk.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Refer to VII. a) above. In addition, all trenching for pipe replacement would be backfilled and all disturbed areas would be revegetated with appropriate non-invasive, low water use, container plants and a hydroseed mix to control erosion. Additionally, appropriate Best Management Practices would be utilized during project construction to prevent soil erosion. As such, the project would not result in a substantial amount of soil erosion or loss of topsoil.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Refer to VII. a) above. Additionally, the project is located within City of San Diego Geologic Hazard Category 52 which is designated as "other level areas, gently sloping to steep terrain with a favorable geologic structure and low geologic risk." According to the geotechnical report, the proposed project will not destabilize or results in settlement of adjacent property of the right-of-way, nor will the proposed improvements add surcharge on existing improvements or structures. The project alignment will be adequately stable following completion of the construction of sewer and storm drain pipelines. In addition, proper engineering design and utilization of standard construction practices would ensure that the potential impacts would be less than significant.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Refer to VII. a). In addition, the project's geotechnical consultant concluded in the geotechnical investigation that, in their opinion, the majority of on-site materials are considered non-expansive or to have low expansion potential.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No septic or alternative wastewater systems are proposed since the scope of the project is to repair, replace, and install new existing sewer and storm drain pipes. No impact would occur.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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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 CAP is a plan for the reduction of GHG emissions in accordance with CEQA Guidelines Section

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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.				
<p>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.</p> <p>Under Step 1 of the CAP Checklist the proposed project is consistent with the existing General Plan and Community Plan land use designations, and zoning designations for the project site. Therefore, the proposed project is consistent with the growth projections and land use assumptions used in the CAP.</p> <p>Furthermore, completion of the Step 2 of the CAP Checklist for the project demonstrates that the CAP strategies for reduction in GHG emissions are not applicable to the project because it is a sewer and storm drain project with that will not require a Certificate of Occupancy from the Building Official. Therefore, the project has been determined to be consistent with the City of San Diego Climate Action Plan, would result in a less than significant impact on the environment with respect to Greenhouse Gas Emissions, and further GHG emissions analysis and mitigation would not be required.</p>				
b) Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Refer to VIII. a)				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<p>Construction of the project may require the use of hazardous materials (e.g. fuels, lubricants, solvents, etc.) which would require proper storage, handling, use and disposal; however, these conditions would not occur during routine construction within the PROW. Construction specifications would include requirements for the contractor regarding where routine handling or disposal of hazardous materials could occur and what measures to implement in the event of a spill from equipment. Compliance with contract specifications would ensure that potential hazards are minimized to below a level of significance.</p>				
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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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

Staff searched the State Water Resources Control Board GeoTracker website, and there are no Leaking Underground Storage Tank (LUST) or other cleanup sites, hazardous waste sites, or land disposal sites within or adjacent to the project. In the event that construction activities encounter underground contamination, the contractor would be required to implement section 5-15 of the City's "WHITEBOOK" for "Encountering or Releasing Hazardous Substances" of the *City of San Diego Standard Specifications for Public Works Construction* which is included in all construction documents and would ensure the proper handling and disposal of any contaminated soils in accordance with all applicable local, state, and federal regulations. Compliance with these requirements would minimize the risk to the public and the environment; therefore, impacts would remain less than significant.

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| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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Portions of the project alignment are within one-quarter mile of Saint Augustine High School and would involve trenching or excavation activities that could result in the release of hazardous emissions if unanticipated contamination is encountered within the PROW. However, compliance with section 5-15 of the City's "WHITEBOOK" is required and ensures that appropriate protocols are followed pursuant to County DEH requirements should any hazardous conditions be encountered. As such, impacts regarding the handling or discovery of hazardous materials, substances or waste within close proximity of a school would be below a level of significance with implementation of the measures required pursuant to the contract specifications and County DEH oversight.

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| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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See IX. a)-c) above. Additionally, the project alignment is not on a list of hazardous materials locations compiled pursuant to Government Code Section 65962.5. No impact would occur.

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| e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two mile of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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Portions of the project alignment are within the Airport Influence Area -Review Area 2 of the San Diego International Airport (SDIA) Land Use Compatibility Plan, and within the FAA Part 77 Notification Area for SDIA. Since the proposed project involves linear underground work on sewer and storm drains, it would not introduce any new features that would result in a safety hazard for people residing or working in the area or create a flight hazard. No impact would occur.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project site is not within proximity of a private airstrip. No impact would occur.

g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Construction of the proposed project may temporarily affect traffic circulation within the project Area of Potential Effect (APE) and its adjoining roads. An approved Traffic Control Plan would be implemented during construction which would allow emergency plans to be employed. Therefore, the project would not physically interfere with and adopted emergency response plan or emergency evacuation plan, and no impact would occur.

h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The proposed project would be located within a natural canyon. However, the proposed sewer and storm drain infrastructure would not introduce any new features that are combustible or would increase the risk of fire. Revegetation of the disturbed canyon areas will be completed in accordance with the brush management regulations of the San Diego Municipal Code which would reduce potential impacts to a less than significant level.

X. HYDROLOGY AND WATER QUALITY - Would the project:

a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Potential impacts to existing water quality standards associated with the proposed project would include minimal short-term construction-related erosion sedimentation but would not include any long-term operational storm water impacts. The project would be required to comply with the City's Storm Water Standards Manual and all requirements of the most current Regional Water Quality Control Board municipals storm water (MS4) permit. Engineers from the Engineering & Capital Projects Department would be responsible for compliance with all storm water regulations. The proposed project would not violate any existing water quality standards or waste discharge requirements, thus no impact would occur.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project does not use groundwater, nor would it create new impervious surfaces that would interfere with groundwater recharge; therefore, no impact would occur.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner, which would result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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See X. a). All areas that are trenched would be backfilled to match adjacent natural grade. All disturbed areas, including temporary construction access and staging, would be re-vegetated with a native hydroseed mix and non-invasive, low water use container plants to minimize soil erosion. Temporary irrigation would be provided for a period sufficient to establish plant material. Concrete energy dissipaters per City Standard Drawing SDD-105 have been proposed at the outfall locations to help reduce exit velocities from the outfalls to non-erosive conditions. Compliance with local, state, and federal storm water regulations would ensure that any alterations to the drainage system in Switzer Canyon would reduce potential impacts from erosion or siltation to less than significant.

d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner, which would result in flooding on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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See X. c). Since this is a sewer and storm drain infrastructure project, and the majority of project features will be constructed underground, backfilled, and revegetated, existing impervious area as well as the hydrology of the basins are not anticipated to change. Hence, post-project runoff will remain similar to pre-project runoff. The proposed project does not include any features that would increase the risk associated with flooding beyond those of existing conditions; therefore, impacts would be less than significant.

e) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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See X. c)-d). The project would be required to comply with all local and regional storm water quality standards during construction using approved Best Management Practices (BMPs), which would

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ensure that water quality is not degraded. Therefore, impacts would be less than significant, and no mitigation is required.				
f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
See X. c) - e).				
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The project does not propose housing. No impact would result.				
h) Place within a 100-year flood hazard area, structures that would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
The project does not propose any structures that would significantly impede flood flows as it is a linear underground storm drain repair project. Four concrete energy dissipaters (SDD-105) have been proposed at the outfall locations to help reduce exit velocities from the outfall to non-erosive conditions. Impacts from energy dissipaters to hydrology are less than significant.				
XI. LAND USE AND PLANNING – Would the project:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The project would involve replacing and installing utility infrastructure primarily underground and would not introduce any new features that could divide an established community.				
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The project would be consistent with all applicable land use plans, policies, or regulations of an agency with jurisdiction over the project and would not conflict with any land use plans. No impact would occur.				
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
See also responses in Section IV, Biological Resources. The project is within and adjacent to the MHPA preserve area of the City of San Diego Multiple Species Conservation Program (MSCP). The project will be required to implement MHPA Land Use adjacency Guidelines and California Gnatcatcher requirements as a condition of the SDP. Impacts would be less than significant.				

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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XII. MINERAL RESOURCES – Would the project:

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| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project is not located in an MRZ 2 classification area. The site is not large enough to allow an economically feasible aggregate mining operation (less than 10 acres). The site is not being used for the recovery of mineral resources. Therefore, the project would not result in the loss of mineral resources, and no impact would occur.

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| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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The areas around the proposed project alignment are not designed by the General Plan or other local, state or federal land use plan for mineral resources recovery. No impact would occur.

XII. NOISE – Would the project result in:

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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Generation of, noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
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The proposed sewer and storm drain project would not result in the generation of operational noise levels in excess of existing standards or existing ambient noise levels in the vicinity of the project. No impact would occur.

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Generation of, excessive ground borne vibration or ground borne noise levels? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The project would not result in the generation of operational ground borne vibration or noise levels in excess of existing standards or ambient levels. No impact would occur.

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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

Refer to XIII. a)-b). No impact would occur.

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above existing without the project? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

The proposed sewer and storm drain project would result in temporary construction noise and is required to comply with the San Diego Municipal Code, Chapter 5, Article 9.5, (§59.5.0404 Construction Noise), which regulates construction noise levels. The project would be required to conduct any construction activity so as to not cause, at or beyond the property lines of any property

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
zoned residential, an average sound level greater than 75 decibels during the 12-hour period from 7:00 a.m. to 7:00 p.m. Work in the Balboa Park Golf course is anticipated to occur at night to minimize disturbance to daytime patrons of the golf course. Work would involve sewer construction using trenchless technology as well as manhole construction and abandonment and would occur for approximately 6-8 months. Night work would only be located within the golf course. All other project work outside of the course would occur during the day. Noise impacts are presumed to be less than significant.				
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 expose people residing or working in the area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
The project is not within a noise contour of the San Diego International Airport Land Use Compatibility Plan. The project itself would not generate operational noise. Compliance with OSHA standards will ensure the project workers would not be exposed to excessive noise levels. Therefore impacts would be less than significant.				
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
The project site is not located within the vicinity of a private airstrip. No impact would occur.				
XIV. POPULATION AND HOUSING – Would the project:				
a) Induce substantial 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
The project scope does not include the construction of new homes and businesses or new or extended roads. The project is primarily replacement of existing infrastructure and includes installation of limited new sewer and storm drain infrastructure. However, the project would not induce significant population growth or require the construction of any new infrastructure beyond the project itself.				
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
No such displacement would result, and no impact would occur.				
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
No such displacement would result, and no impact would occur.				

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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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	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii) Police protection	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii) Schools	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv) Parks	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
v) Other public facilities	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The project would not result in adverse physical impacts of fire facilities or adversely affect existing levels of fire or police services. The project would not require the construction or expansion of a fire, police, school, park, or other public facility. No impact would occur.

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?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project would not adversely affect the availability of and/or need for new or expanded recreational resources. No impact would occur.

- 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?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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See XV a) and XVI a). No impact would occur.

XVII. TRANSPORTATION/TRAFFIC – Would the project?

- a) Conflict with an adopted program, plan, ordinance or policy addressing the transportation system, including transit, roadways, bicycle and pedestrian facilities?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The sewer and storm drain infrastructure project would not conflict with an applicable plan, ordinance or policy addressing the transportation system including transit, roadway, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. Construction of the proposed project may temporarily affect traffic circulation within the project Area of Potential

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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Effect (APE) and its adjoining roads. However, an approved Traffic Control Plan would be implemented during construction such that traffic circulation would not be substantially impacted. Therefore, the project would not result in any significant transportation/traffic impact.

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|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| b) Result in VMT exceeding thresholds identified in the City of San Diego Transportation Study Manual? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

During project construction, primarily heavy-duty trucks will be utilized. CEQA Guidelines Section 15064.3, subdivision (a), states, "For the purposes of this section, 'vehicle miles traveled' refers to the amount and distance of automobile travel attributable to a project." Here, the term "automobile" refers to on-road passenger vehicles, specifically cars and light trucks, rather than heavy construction vehicles. During project operation the project is considered a small project that will result in less than 300 daily trips. During operation minimal trips would be generated from infrequent maintenance activities. The project is not required to perform a transportation VMT CEQA analysis. Impacts from VMT are presumed to be less than significant and no mitigation is required.

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|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| c) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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The sewer and storm drain infrastructure would not include any design features that would substantially increase hazards or incompatible uses. Impacts would be less than significant.

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| d) Result in inadequate emergency access? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
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See XVII a). The project would not result in inadequate emergency access; impacts would be temporary and 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:

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|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 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 | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

Refer to Section V. b). No tribal cultural resources as defined by Public Resources Code section 21074 have been identified on the project site. Furthermore, the project site was not determined to be eligible for listing on either the State or local register of historical resources. The Lipay Nation of Santa Ysabel, Jamul Indian Village, and San Pascual Band of Mission Indians of Kumeyaay Nation Native American tribes which are traditionally and culturally affiliated with the project area have requested consultation with the City of San Diego pursuant to Public Resources Code section 21080.3.1. These tribes were notified of the opportunity to consult with the City of San Diego on the proposed project and responded that they do not have any comments for this project. Consultation

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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began June 11, 2020 and concluded on July 11, 2020. Therefore, the project will not impact Tribal Cultural Resources and no mitigation is required.

- b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

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No significant resources pursuant to subdivision (c) of Public Resources Code Section 5024.1 have been identified on the project site. See discussion in V. a).

XIV. UTILITIES AND SERVICE SYSTEMS – Would the project:

- a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

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The project sewer improvements would be consistent with applicable requirements of the Regional Quality Control Board with respect to wastewater treatment. No impact would occur.

- b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

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The proposed project would result in improvements to the storm drain and sewer infrastructure. It would not affect water delivery systems and would not require the construction or new water or wastewater treatment facilities in addition to the project.

- c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

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The project is replacement of existing storm drain infrastructure and construction of appurtenant storm water management structures that would not require the construction of new storm water drainage facilities or expansion of existing facilities beyond the project itself. No impact would occur.

- d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

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Construction of the proposed project would not increase the demand for water and within the project area.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Refer to XIV. c.)

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Construction of the project would result in the removal of the existing outdated pipelines, but otherwise is presumed to generate minimal waste. Project waste would be disposed of in accordance with all applicable local and state regulations pertaining to solid waste including the permitted capacity of the landfill serving the project area. Demolition or construction materials which can be recycled shall comply with the City's Construction and Demolition Debris Ordinance. Operation of the project would not generate waste and, therefore, would not affect the permitted capacity of the landfill serving the project area.

g) Comply with federal, state, and local statutes and regulation related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Refer to XIV. f). Any solid waste generated during construction related activities would be recycled or disposed of in accordance with all applicable local, state and federal regulations.

XX. WILDFIRE – Would the project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The 2017 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 is partially located in a Very High Fire Hazard Severity Zone (VHFHSZ). A traffic control plan would be provided per Standard Specifications for Public Works Construction, which would allow access for emergency vehicles. At least 48 hours in advance of closing, partially closing or reopening, any street, alley, or other public thoroughfare, the Police, Fire, Traffic and Engineering Departments shall be contacted. Therefore, the project would not conflict with emergency response and would not substantially impair an adopted emergency response plan. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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While the project is located partially in a VHFHSZ, implementation of fire safety procedures in the Standard Specifications for Public Works Construction would reduce the potential for exacerbating fire risk due to construction activities to a less than significant level. In addition, the project is required to implement SDMC §142.0412 Brush Management regulations. The rehabilitation, replacement, and construction of water and storm drain infrastructure would not impact the risk of wildfire during operation. The project would not significantly exacerbate wildfire risks, and no mitigation is required.

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|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

The project is currently serviced by existing infrastructure which would service the site during and after construction. The project area has adequate fire hydrant services and street access. No new infrastructure is proposed to support the project that may exacerbate fire risk. Impacts would be less than significant, and no mitigation is required.

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|---|--------------------------|--------------------------|-------------------------------------|--------------------------|
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|---|--------------------------|--------------------------|-------------------------------------|--------------------------|

Within areas of vegetated land cover, the project revegetation plan revegetates all impact areas, in accordance with the City's Landscape Regulations and Land Development Code. The project would not expose people or structures to significant risk from flooding or landslide as a result of runoff, post-fire instability, or drainage changes.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE –

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|--|--------------------------|-------------------------------------|--------------------------|--------------------------|
| 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? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|-------------------------------------|--------------------------|--------------------------|

Although the proposed project could have significant impacts to sensitive biological resources, these impacts would be mitigated to a less than significant level by the mitigation measures identified in the Mitigation Monitoring and Reporting Program in Section V of the MND. These mitigation requirements are also consistent with the MSCP City of San Diego Subarea Plan. As stated in the initial study checklist, the project would result in less than significant impacts on archaeological,

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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tribal cultural, and paleontological resources. Historical built environmental resources would not be impacted by the project as stated in the Initial Study.

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|--|--------------------------|-------------------------------------|--------------------------|--------------------------|
| 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)? | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|-------------------------------------|--------------------------|--------------------------|

The City of San Diego MSCP Subarea Plan addresses cumulative impacts on biological resources throughout San Diego. Since the mitigation measures identified in Section V of the MND are consistent with the avoidance and mitigation requirements for listed species, and the mitigation ratio requirements, of the Subarea Plan, the proposed project is consistent with the Subarea Plan. As a result, project implementation would not result in any individually limited, but cumulatively significant impacts to these resources. Based on the project's consistency with the Climate Action Plan it would not result in cumulatively considerable environmental impacts relative to greenhouse gas emissions.

Furthermore, when considering all potential environmental impacts of the proposed project, including impacts identified as less than significant in the Initial Study Checklist, together with the impacts of other present, past and reasonably foreseeable future projects, there would not be a cumulatively considerable impact on the environment.

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|--|--------------------------|--------------------------|-------------------------------------|--------------------------|
| c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
|--|--------------------------|--------------------------|-------------------------------------|--------------------------|

As evidenced by the Initial Study Checklist, the project does not have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly.

INITIAL STUDY CHECKLIST REFERENCES

I. Aesthetics / Neighborhood Character

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City of San Diego General Plan; City of San Diego Land Development Municipal Code
Community Plans: North Park, Greater Golden Hill

II. Agricultural Resources & Forest Resources

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

III. Air Quality

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California Clean Air Act Guidelines (Indirect Source Control Programs) 1990
Regional Air Quality Strategies (RAQS) - APCD
Site Specific Report:

IV. Biology

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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:
Sewer and Storm Drain Group Job 828 Project Biological Resources Report, prepared June 26, 2020 by Rocks Biological Consulting

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

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City of San Diego Historical Resources Guidelines
City of San Diego Archaeology Library
Historical Resources Board List
Community Historical Survey:
Site Specific Report: Archaeological Constraints Analysis for the Sewer Group 828 Geotechnical Testing Project, prepared by Laguna Mountain Environmental, Inc. January 29, 2018

VI. Energy

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City of San Diego Climate Action Plan, December 2015
CAP Consistency Checklist prepared for Group Job 968, 2019

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
- ☒ Site Specific Report: Updated Report of Geotechnical Investigation Sewer and Storm Drain Group Job 828 Replacement Project, prepared by Allied Geotechnical Engineers April 10, 2020

VIII. Greenhouse Gas Emissions

- ☒ Site Specific Report: Climate Action Plan Consistency Checklist for Sewer-Storm Drain GJ 828 (PTS No. 652296), prepared by City of San Diego Engineering & Capital Projects Department

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
- ☐ Site Specific Report:

X. Hydrology/Drainage

- ☒ 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
- ☒ City of San Diego Drainage Design Manual
- ☒ City of San Diego Storm Water Standards Manual
- ☒ Site Specific Report: 100% Submittal City of San Diego Storm Drain Group Job 828 Drainage Study Prepared by CValdo Corporation October 7, 2019

XI. Land Use and Planning

- ☒ City of San Diego General Plan
- ☒ North Park, Greater Golden Hill Community Plan
- ☐ Airport Land Use Compatibility Plan
- ☒ 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 1996
- ☐ 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: North Park, Greater Golden Hill
- ☒ San Diego International Airport - Lindbergh Field CNEL Maps
- ☐ Brown Field Airport Master Plan CNEL Maps
- ☐ Montgomery Field CNEL Maps
- ☐ 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:

XIV. Paleontological Resources

- ☒ 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:

XV. Population / Housing

- ☒ City of San Diego General Plan
- ☒ Community Plan: North Park, Greater Golden Hill
- ☐ Series 11/Series 12 Population Forecasts, SANDAG
- ☐ Other:

XVI. Public Services

- ☒ City of San Diego General Plan
- ☒ Community Plan: North Park, Greater Golden Hill

XVII. Recreational Resources

- ☒ City of San Diego General Plan
- ☒ Community Plan North Park, Greater Golden Hill
- ☐ Department of Park and Recreation
- ☐ City of San Diego - San Diego Regional Bicycling Map
- ☐ Additional Resources:

XVIII. Transportation / Traffic

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

XIX. Utilities

- ☐ Site Specific Report:

XX. Water Quality

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Clean Water Act Section 303(b) list, http://www.swrcb.ca.gov/tmdl/303d_lists.html

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California Regional Water Quality Control Board San Diego Region Order No. R9-2013-0001
as amended by Order Nos. R9-2015-0001 and R9-2015-0100 (NPDES permit)

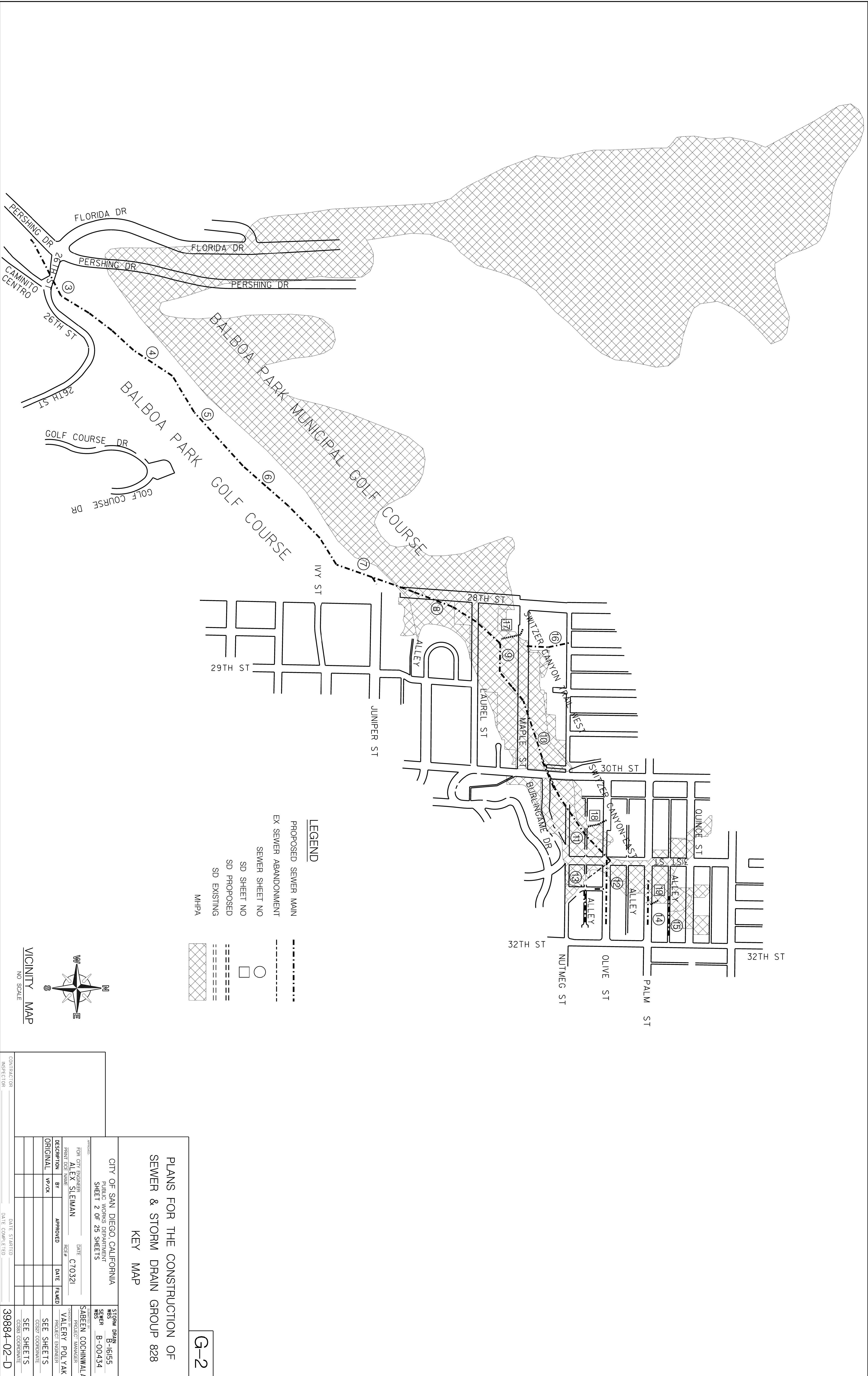
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Site Specific Report:

XXI. Wildfire

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San Diego County Multi-Jurisdictional Hazard Mitigation Plan, 2017



KEY MAP

G-2

PLANS FOR THE CONSTRUCTION OF
SEWER & STORM DRAIN GROUP 828


KEY MAP

100% DESIGN




FIGURE
2

Project Components and MHPA
CITY OF SAN DIEGO STORM DRAIN GJ 828
AND SEWER GJ 828



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Aerial Photo: SANDAG & SanGIS 2017
Source: City of San Diego, IEC