



THE CITY OF SAN DIEGO

M E M O R A N D U M

DATE: August 30, 2023

TO: Project Submittal & Management, Public Projects, Development Services Department

FROM: Roman Anissi, Senior Planner, Stormwater Department

SUBJECT: Climate Action Plan (CAP) Memo for Public Project Assessment for SD East of Rachael Avenue SWD (Phase 1-6) project (IO# 30007132) PTS# 706873

Introduction

The City of San Diego (City) Stormwater Department (SWD) submits for review the SD East of Rachael Avenue SWD (Phase 1-6) Public Project Assessment (PPA) (originally referred to as Skyline - Paradise Hills East 1, 2, 3 and West 4, 5, 6 projects). This is a federal Environmental Protection Act (EPA) Water Infrastructure Finance and Innovation Act (WIFIA) loan funded project, that in part, will require SWD to contribute a matching component from City general and non-general fund sources. The current WIFIA/City program agreement expires in August 2027.

The proposed project is anticipated to be reviewed for consistency with the Municipal Waterways Maintenance Plan (MWMP) Environmental Impact Report (EIR) (Project No. 616992; SCH No. 2017071022) and Master Site Development Permit (SDP No. 2392210).

An added part of project assessment is to conduct a review via this memo for consistency with the City's Climate Action Plan (CAP), which was updated in August 2022, is a qualified plan for the reduction of GHG emissions for use in cumulative impact analysis pertaining to projects under CEQA Guidelines Section 15183.5. Pursuant to CEQA Guidelines Sections 15064(h)(3), 15130(d), and 15183(b), a project's incremental contribution to a cumulative GHG emissions effect may be determined not to be cumulatively considerable if it complies with the requirements of the CAP. The CAP includes six strategies developed to reduce citywide GHG emissions and achieve the GHG reduction targets identified in the CAP. The project's consistency with these strategies is discussed below.

Strategy 1: Decarbonization of the Built Environment

The project would re-align six (6) stormdrain pipe segments and assets from their current location on private property to the developed right-of-way (ROW) and would not construct

any new buildings. Therefore, the project would not conflict with the applicable CAP goals and strategies identified in Strategy 1.

Strategy 2: Access to Clean and Renewable Energy

The project does not include any features that would change the source of any energy supplied, increase operational energy demand, or interfere with the City's transition to renewable energy sources. Thus, the project would not conflict with the applicable CAP goals and strategies identified in Strategy 2.

Strategy 3: Mobility and Land Use

The project would not conflict with any circulation programs, plans, ordinances, or policies. An approved temporary Traffic Control Plan would be implemented to ensure continued and ongoing circulation is available during construction related activities within what is largely a residential neighborhood. The temporary nature of construction that would include intermittent lane closures on the neighborhood roadways, would not result in a permanent change to the level of service of the surrounding circulation system, and would not impact any public transit facilities. The project involves re-alignment of stormwater pipe segments onto the developed right of way. and would not result in any land use changes. Thus, the project would not conflict with the applicable CAP goals and strategies identified in Strategy 3

Strategy 4: Circular Economy and Clean Communities

The project would implement EP-SW-1 (Waste Management Plan), EP-SW-2 (Reusable Materials), EP-SW-3 (Suitable Reuse), EP-SW-4 (Green Waste), EP-SW-6 (Material Diversion), EP-SW-7 (Landfill Notification), and EP-SW-8 (Composting), which would ensure solid waste generated from both construction and maintenance activities is diverted from the landfill to the maximum extent feasible. Therefore, the project would comply with the City's Construction and Demolition Debris Diversion Ordinance and would not conflict with the applicable CAP goals and strategies identified in Strategy 4.

Strategy 5: Resilient Infrastructure and Healthy Ecosystems

The project would complete storm drain maintenance and repair to prepare for greater prevalence of extreme rain events, while moving pipes from private property onto the public right of way to allow for better maintenance access in the future. In addition, the project would not impact any sensitive species or habitats since it would be located within the developed right of way. General nesting bird surveys and protections would be implemented during bird breeding season (Jan 15–Sept 15) to promote a healthy ecosystem surrounding the project area. The project would protect existing street trees in place to the extent feasible and the existing pipeline would be abandoned in place so as not require removal of any above surface elements that may exist on private properties. In the event that street trees would need to be removed, the project would implement the City's "Street Tree Selection Guide" (<https://www.sandiego.gov/sites/default/files/street-tree-selection-guide.pdf>) elements and would coordinate with the adjacent property owner for ongoing care and maintenance, as appropriate. Therefore, the project would not conflict with the applicable CAP goals and strategies identified in Strategy 5.

Strategy 6: Emerging Climate Actions

Strategy 6 of the City's 2022 CAP addresses those GHG emissions that will remain after all currently identified measures and actions have been achieved, which account for roughly 20% of total GHG emissions by 2035. To succeed in the City's overall goal, the City must continue to identify additional actions, pursue technological innovation, expand partnerships, and support research that reduces GHG emissions in all sectors. While Strategy 6 is not directly applicable to the project, the project does not include any features which would conflict with the City's actions to implement Strategy 6.

The project is consistent with each of the CAP's strategies and would not conflict with the City's CAP or another applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions. Impacts would be less than significant and consistent with the analysis in the MWMP EIR.

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