THE CITY OF SAN DIEGO

M E M O R A N D U M

DATE: August 20, 2024

TO: File

FROM: Jamie Kennedy

SUBJECT: Climate Action Plan (CAP) Memo for the Point Loma Wastewater Treatment Plant Stormwater Diversion Project (WBS #B-20001, PTS #1083414)

Introduction

The Engineering Capital Projects Department (ECP) Environmental Permitting Support (EPS) staff has requested ECC staff review the Point Loma Wastewater Treatment Plant (PLWTP) Stormwater Diversion Project (Project) pursuant to CEQA. The Project proposes to reduce pollutant concentrations in storm water discharged from PLWTP to below specific numeric levels. Work includes the construction of six submersible storm drain lift stations and check valve vaults; installation of approximately 605 Linear Feet (LF) of 4-inch force main, 600 LF of 6-inch force main, and 850 LF of 8-inch force main; regrading of small areas to improve drainage; installation of 45 LF of trench drain, 365 LF of 8-inch polyethylene pipe, 1,365 LF of 24-inch reinforced concrete pipe (RCP), 21 catch basins and cleanouts, 80 LF of ribbon gutter, and sidewalk and curb gutter replacement; and improvements to the concrete basin, Gas Utilization Facility, and the South Effluent Screening Facility. The project also includes the installation of 1,240 linear feet of electrical conduit, liner repair of a 60-foot length of the existing outfall #4 pipe, and a minor correction to an existing MHPA boundary.

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

Strategy 1: Decarbonization of the Built Environment
This strategy aims to avoid greenhouse gas emissions from buildings across the City and improve indoor air quality. It includes measures to address emissions from existing buildings, municipal facilities, and new development.

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

Strategy 2: Access to Clean and Renewable Energy
This strategy maintains the City's commitment to 100% renewable energy through San Diego Community Power, sets targets for converting the City's fleet of vehicles to electric, and aims to increase the number of electric vehicles used by our communities.

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

Strategy 3: Mobility and Land Use
This strategy focuses on emissions from transportation and includes actions that support mode shift through mobility and land-use actions and policies.

The Project includes the installation of storm water utilities within the existing Point Loma Wastewater Treatment Plant, which is not open to the public. The project would not result in any land use changes. An approved temporary Traffic Control Plan would be implemented during construction to ensure continued and ongoing circulation is available to treatment plant employees during construction-related activities. If necessary, temporary lane closures on roadways would not result in a permanent change to the level of services of the surrounding transportation system and would not impact any public transit facilities. While Strategy 3 is not directly applicable to the Project, the Project would not conflict with the applicable CAP goals and strategies identified in Strategy 3.

Strategy 4: Circular Economy and Clean Communities
This strategy maintains a 90% waste diversion rate, as well as methane capture from landfill and wastewater treatment facilities. It also includes actions to increase healthy food access and food recovery.

The Project includes the requirement for the construction contractor to comply with the latest edition of the City of San Diego Standard Specifications for Public Works Construction (Whitebook). Sections 5-14 of the Whitebook, Construction and Demolition Waste Management, requires a minimum waste management reduction goal and the preparation of a waste Management Form. The Project would comply with Municipal Code §§66.0601–66.0610 (the City's Construction and Demolition Debris Diversion Deposit Program). Therefore, the Project would not conflict with the applicable CAP goals and strategies identified in Strategy 4.

Strategy 5: Resilient Infrastructure and Healthy Ecosystems

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

The Project proposes to reduce pollutant concentrations in storm water discharged from PLWTP, which would make the entire treatment plant more resilient to the effects of changing precipitation as a result of climate change. These improvements would be located within the existing Point Loma Wastewater Treatment Plant and would not impact any sensitive species or habitats. General nesting bird surveys and protections would be implemented in accordance with the latest edition of the Whitebook, Section 300, Earthwork. The Project would not affect any publicly accessible right of way or associated street trees. Therefore, the Project would not conflict with the applicable CAP goals and strategies identified in Strategy 5.

Strategy 6: Emerging Climate Actions

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

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

Conclusion

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