THE CITY OF SAN DIEGO

MITIGATED NEGATIVE DECLARATION

Project No. 696140
SCH No. Pending

SUBJECT: City of San Diego Dam Maintenance Program SITE DEVELOPMENT PERMIT (SDP) to allow for the City of San Diego (City) Public Utilities Department (PUD) to implement the Dam Maintenance Program (Project) consisting of oversight and maintenance activities at 13 of the City's dams, Dulzura Conduit, and associated infrastructure located throughout San Diego County. PUD owns and manages 13 dams, spillways, and associated infrastructure, including the approximately 13-mile Dulzura Conduit. These facilities are part of the City's drinking water infrastructure and are subject to the regulatory jurisdiction of the Division of Safety of Dams (DSOD), which is part of the California Department of Water Resources. The DSOD oversees dam safety in California with the goal of avoiding dam failure which could lead to potential loss of life and destruction of property. As part of the dam safety program, the DSOD completes detailed inspections and reports of the City's dams to identify on-going issues such as vegetation removal, grading, dredging, and repairs to infrastructure and may request certain maintenance work to be performed to improve dam safety. The proposed Dam Maintenance Program (Program) would cover maintenance activities that are routinely included in these DSOD inspection reports. The project would occur within the following community planning areas; Black Mountain Ranch, Mid-City: Eastern Area, Navajo, Rancho Bernardo, San Pasqual, and Scripps Ranch and in City owned lands within the County of San Diego. Zoning would Include: AR-1-1 (Black Mountain, Miramar, Murray, Rancho Bernardo Dams), AG-1-1 (Hodges Dam), and OP-1-1 (Chollas Dam). APPLICANT: City of San Diego Public Utilities Department.

I. PROJECT DESCRIPTION:

See attached Initial Study.

II. ENVIRONMENTAL SETTING:

See attached Initial Study.

III. DETERMINATION:

The City of San Diego conducted an Initial Study which determined that the proposed project could have a significant environmental effect in the following areas(s): **Biological Resources and Noise**. 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:

A. GENERAL REQUIREMENTS

B. SPECIFIC MMRP ISSUE AREA CONDITIONS REQUIREMENTS

BIOLOGICAL RESOURCES

BIO-1 Wetland Habitat Mitigation: Impacts to wetland habitats shall be mitigated at ratios provided in Table 2A of the City's Biology Guidelines through one or a combination of the following: habitat creation, restoration, and/or enhancement; acquisition and preservation of specific land; purchase of mitigation credits at an approved mitigation bank; and/or allocation of available mitigation credits at an existing City Public Utilities Department mitigation site(s). In accordance with the City's Biology Guidelines, impacts to wetland must be mitigation "in-kind" and achieve a "no-net loss" of wetland function and values. Therefore, a minimum 1:1 mitigation ratio shall be provided in the form of creation and/or restoration in order to achieve the no-net loss requirement.

Mitigation locations for wetland impacts shall be selected using the following order of preference, based on the best mitigation value to be achieved:

1. Existing PUD mitigation site(s) (within approved service area).
2. Mitigation site(s) within the impacted watershed on City-owned lands or other publicly owned lands.
3. Approved mitigation bank with a primary service area that includes impacted watershed(s).
4. Approved mitigation bank with a secondary service area that includes impacted watershed(s).
5. Mitigation site(s) outside of impacted watershed(s).

In order to mitigate for impacts in an area outside the limits of the watershed within which the impacts occur, it must be demonstrated that no suitable location exists within the impacted watershed to the satisfaction of the City Manager (or appointed designee) in consultation with the applicable Resource Agencies.

If mitigation is to occur through habitat creation, restoration, and/or enhancement, a Wetland Mitigation Plan shall be prepared in accordance with the City's Biological Guidelines and shall include the following information:

- Planting plan, including plant zones and target habitats;
- Timing;
- Irrigation and grading requirements (as necessary);
- Planting and seeding specifications including plant and seed palettes;
- Monitoring and reporting program;
- Performance standards; and
- Long-term maintenance and preservation plan.

Mitigation which involves habitat acquisition and preservation shall include the following:

- Location of proposed acquisition;
- Description of the biological resources to be acquired including support for the conclusion that the acquired habitat mitigates for the specific maintenance impact; and
- Documentation that the mitigation area would be adequately preserved and maintained in perpetuity.

Mitigation which involves the allocation of mitigation credits from an approved PUD mitigation site or purchase of mitigation credits from an approved mitigation bank shall include the following:

- Location of the mitigation site/mitigation bank;
- Description of the credits to be acquired including support for the conclusion that the acquired habitat mitigates for the specific maintenance impact;
- Documentation that the credits are associated with the mitigation site/mitigation bank are available and have been approved by the appropriate Resource Agencies; and
- Documentation in the form of a current mitigation credit ledger.

Anticipated Program impacts to wetland habitats resulting from the implementation of the overall Program and mitigation requirements are summarized below:

- Impacts to 1.49 acres of southern riparian forest and 0.08 acre of riparian woodland will be provided at a 3:1 ratio for an anticipated combined mitigation obligation of 4.71 acres.
- Impacts to 0.27 acre of southern willow scrub, 1.05 acres of freshwater marsh, 0.02 acre of disturbed wetland, 0.06 acre of non-native riparian, 0.49 acre of unvegetated habitat/lakeshore fringe, and 0.06 acre of non-vegetated channel will be provided at a 2:1 ratio, for an anticipated combined mitigation obligation 3.90 acres.

- Mitigation for wetland impacts shall include a minimum 1:1 creation (establishment) or restoration (re-establishment) component to ensure no net loss of wetlands.

BIO-2 Upland Habitat Mitigation: Impacts to sensitive upland habitats shall be mitigated at ratios provided in Table 3 of the City's Biology Guidelines through one or a combination of the following: habitat creation, restoration, and/or enhancement; acquisition and preservation of specific land; purchase of mitigation credits at an approved mitigation bank; and/or allocation of available mitigation credits at an existing City Public Utilities Department mitigation site(s). In accordance with the City's Biology Guidelines, mitigation for impacts to Tier I habitat could either occur within the Multi-Habitat Planning Area portion of Tier I (in Tier), or outside of the Multi-Habitat Planning Area within the affected habitat type (in-kind). Mitigation for impacts to Tier II, IIIA, and IIIB habitats could either occur within the Multi-Habitat Planning Area portion of Tier I-IIIB (out-of-kind) or occur outside of the Multi-Habitat Planning Area within the affected habitat type (in-kind).

If mitigation is to occur through habitat creation, restoration, and/or enhancement, an Upland Mitigation Plan shall be prepared in accordance with the City's Biological Guidelines and shall include the following information:

- Planting plan, including plant zones and target habitats;
- Timing;
- Irrigation and grading requirements (as necessary);
- Planting and seeding specifications including plant and seed palettes;
- Monitoring and reporting program;
- Performance standards; and
- Long-term maintenance and preservation plan.

Mitigation which involves habitat acquisition and preservation shall include the following:

- Location of proposed acquisition;
- Description of the biological resources to be acquired, including support for the conclusion that the acquired habitat mitigates for the specific maintenance impact; and
- Documentation that the mitigation area would be adequately preserved and maintained in perpetuity.

Mitigation which involves the allocation of mitigation credits from an approved City Public Utilities Department mitigation site or purchase of mitigation credits from an approved mitigation bank shall include the following:

- Location of the mitigation site/mitigation bank;
- Description of the credits to be acquired, including support for the conclusion that the acquired habitat mitigates for the specific maintenance impact;

- Documentation that the credits are associated with the mitigation site/mitigation bank are available and have been approved by the appropriate Resource Agencies; and

- Documentation in the form of a current mitigation credit ledger.

Anticipated Program impacts to sensitive upland habitats resulting from the implementation of the overall Program and mitigation requirements are summarized below:

- Impacts to 0.20 acre of Tier I habitat, including coast live oak woodland and scrub oak chaparral, shall be mitigated in accordance with ratios provided in Table 3 of the City's Biology Guidelines, for a mitigation obligation of 0.20 acre.

- Impacts to 9.1 acres of Tier II habitat, including Diegan coastal sage scrub (including disturbed, sparse, laurel sumac dominated, and Baccharis dominated) and coastal sage-chaparral scrub, shall be mitigated in accordance with ratios provided in Table 3 of the City's Biology Guidelines, for a mitigation obligation of 9.1 acres.

- Impacts to 3.8 acres of Tier IIIA habitat, including southern mixed chaparral (including Ceanothus dominated), granitic southern mixed chaparral (including disturbed), granitic northern mixed chaparral (including disturbed), and chamise chaparral, shall be mitigated in accordance with ratios provided in Table 3 of the City's Biology Guidelines, for a mitigation obligation of 2.0 acres.

- Impacts to 6.8 acres of Tier IIIB habitat, non-native grassland, shall be mitigated in accordance with ratios provided in Table 3 of the City's Biology Guidelines, for a mitigation obligation of 4.7 acres.

BIO-3 Rare Plant Avoidance and Mitigation: Prior to the clearing of vegetation within the Program area, a Qualified Biologist shall conduct a pre-construction survey for special status plant species previously observed or with high or moderate potential to occur within the affected areas, including a 20-foot buffer, to identify the location and number of any individuals present. Program activities shall avoid impacts to special status plant species found within the maintenance areas to the extent feasible (if present). The locations and/or boundaries of special status plant species to be avoided during maintenance activities shall be clearly delineated with flagging or temporary fencing that must remain in place for the duration of activities. If impacts cannot be completely avoided, then efforts shall be made to limit trimming any individual shrubs to the minimum amount necessary, including root disturbance, which will allow for individuals to resprout from the base.

If Program activities can avoid root disturbance, no additional mitigation would be required. If root disturbance cannot be avoided and removal of state/federally listed or City Narrow Endemic plant species is required, then impacts shall be mitigated at a minimum 1:1 ratio through one or a combination of the following actions: transplantation (when feasible) of impacted individuals to suitable habitat areas located outside of the maintenance footprint; installation of plantings within suitable habitat in the Multi-Habitat Planning Area; and/or enhancement of suitable habitat outside of the maintenance footprint that supports the species through supplement seeding of the species.

Mitigation which involves relocation, planting, or enhancement of special status plant species shall include preparation of a species-specific Restoration or Revegetation Plan to ensure successful establishment to achieve a 1:1 replacement for individuals impacted. The Plan shall include the following information: planting and/or seeding specifications, temporary irrigation requirements (if determined to be necessary), monitoring and reporting program, and performance standards.

BIO-4 Quino Checkerspot Butterfly Avoidance and Mitigation: The City shall obtain take coverage for impacts to Quino checkerspot butterfly and occupied Quino checkerspot butterfly habitat and host plant patches through consultation with the U.S. Fish and Wildlife Service. All Terms and Conditions and Conservation Measures specified by U.S. Fish and Wildlife Service as part of the consultation process shall be adhered to, and any required habitat-based mitigation shall occur at mitigation ratios determined during the consultation process.

Mitigation for Program impacts to 4.56 acres of Quino checkerspot butterfly occupied habitat (including 0.31 acre of Quino checkerspot butterfly host plants) is anticipated to occur at a 1.5:1 ratio through habitat restoration and/or off-site acquisition/preservation of Quino checkerspot butterfly occupied habitat. If mitigation is to occur through habitat restoration, the City shall prepare a Habitat Restoration Plan to describe the approach to a minimum five-year restoration program, maintenance and monitoring methods, performance criteria, adaptive management, and reporting requirements. The City will provide a copy of the Habitat Restoration Plan to U.S. Fish and Wildlife Service for review prior to implementation. Upon successful completion of the restoration program, the restoration site will be managed by the City's Parks and Recreation Department, Public Utilities Department, or other qualified land/preserve manager. Funding for long-term management will be provided through the City's annual fiscal budget. If off-site acquisition/preservation of occupied Quino checkerspot butterfly habitat is to occur, the off-site land shall be protected in perpetuity and managed to ensure long-term protection of the habitat and the habitat quality for Quino checkerspot butterfly.

In addition, USFWS consultation and compensatory mitigation, the City shall implement the following Quino checkerspot butterfly measures for Program activities conducted at San Vicente Dam, Savage Dam, Upper Otay Dam, and Dulzura Conduit in order to avoid and/or minimize impacts to Quino checkerspot butterfly.

A. Program activities that would result in the clearing and/or removal of vegetation shall not commence during the Quino checkerspot butterfly flight season (defined as the third week of February through the second Saturday in May) until the following requirements have been met to the satisfaction of the City Manager (or appointed designee):

    1. A Qualified Biologist shall be present to monitor all vegetation clearing activities and ensure that all flagged and mapped host plant locations planned for avoidance are avoided.

    2. The Qualified Biologist shall conduct environmental awareness training for all maintenance personnel prior to the commencement of individual maintenance activities with the potential to impact Quino checkerspot butterfly and/or potential

Quino checkerspot butterfly habitat, and annually for ongoing routine annual maintenance activities.

3. Access roads, access trail, and footpath trail maintenance within these facilities shall either occur outside of the Quino checkerspot butterfly flight season or be monitored by a Qualified Biologist.

4. Any observations of Quino checkerspot butterfly shall be reported to the City and U.S. Fish and Wildlife Service within 24 hours.

BIO-5 Hermes Copper Butterfly Avoidance and Mitigation: The City shall obtain take coverage for impacts to Hermes copper butterfly and potential occupied habitat. All Terms and Conditions and Conservation Measures specified by U.S. Fish and Wildlife Service as part of the consultation process shall be adhered to, and any required habitat-based mitigation shall occur at mitigation ratios determined during the consultation process.

In addition to the U.S. Fish and Wildlife Service consultation, the City shall implement the following Hermes copper butterfly measures for Program activities conducted at Barrett Dam and Dulzura Conduit in order to avoid and/or minimize impacts to Hermes copper butterfly.

A. Program activities that would result in the clearing and/or removal of vegetation shall not commence during the Hermes copper butterfly flight season (defined as May through July) until the following requirements have been met to the satisfaction of the City Manager (or appointed designee):

   1. A Qualified Biologist shall conduct a pre-construction survey for Hermes copper butterfly and suitable Hermes copper habitat as defined in the Species Status Assessment for the Hermes Copper Butterfly as spiny redberry (*Rhamnus crocea*) occurring in close proximity to California buckwheat (*Eriogonum fasciculatum*) within the affected areas within one week prior to commencement of activities. If found, host plants will be flagged and avoided.

   2. The Qualified Biologist shall present to monitor all vegetation clearing activities and ensure that all flagged and mapped host plant locations planned for avoidance are avoided.

   3. The Qualified Biologist will conduct environmental awareness training for all maintenance personnel prior of individual maintenance activities with the potential to impact Hermes copper butterfly and/or potential habitat species, and annually for ongoing routine annual maintenance activities.

   4. Access roads, access trail, and foot path trail maintenance within these facilities shall either occur outside of the Hermes copper butterfly flight season or be monitored by a Qualified Biologist.

   5. Any observations of Hermes copper butterfly shall be reported to the City and U.S. Fish and Wildlife Service within 24 hours.

BIO-6 Arroyo Toad Avoidance and Mitigation: The following arroyo toad measures shall apply to Program activities conducted at Barrett Dam, El Capitan Dam, and Sutherland Dam.

A. Impacts to potential arroyo toad habitat shall be mitigated in-kind at ratios provided in Table 2A and Table 3 of the City's Biology Guidelines.

B. Program activities that would result in habitat removal or ground-disturbing activity, including spillway clearing and repair, within suitable arroyo toad breeding habitat shall not commence during the arroyo toad breeding season (March 15 through July 1) until the following requirements have been met to the satisfaction of the City Manager (or appointed designee):

1. A Qualified Biologist shall conduct a pre-construction survey for arroyo toad for at least three consecutive nights within one week prior to commencement of activities to determine the presence or absence of arroyo toad within the 500 feet of the affected areas.

I. If arroyo toads are determined to be absent, maintenance/construction activities shall occur under the supervision of the Qualified Biologist with the following requirements:

a. The Qualified Biologist will conduct environmental awareness training for all maintenance personnel prior to the commencement of activities.

b. Work activities will not occur immediately prior to or during rain events.

c. Hours of work will be limited to daylight hours, except when nighttime work is necessary (i.e., for worker safety). If work must be done at night, construction lighting will be of the lowest illumination necessary, selectively placed, shielded, and directed away from natural habitats.

D, The Qualified Biologist shall halt all work activities if any arroyo toads are found to be present within or adjacent to the work areas. Maintenance/construction activities shall not resume until the City has consulted with the U.S. Fish and Wildlife Service to determine appropriate measures to complete activities.

II. If arroyo toads are found to occur within or adjacent to the work areas, maintenance/construction activities shall not occur until either after the arroyo toad breeding season, or until the City has consulted with the U.S. Fish and Wildlife Service to determine appropriate measures to complete activities.

2. All nighttime maintenance/construction activities will be avoided within or adjacent to occupied arroyo toad habitat during the arroyo toad breeding season or monitored by a Qualified Biologist.

3. Access roads, access trail, and footpath trail maintenance at these facilities shall either occur outside of the arroyo toad breeding season or be monitored by a Qualified Biologist.

4. Any observations of arroyo toad shall (including incidental excavation, capture and relocation, injury, or death of arroyo toads in association with Program activities) will be reported to the City and U.S. Fish and Wildlife Service within 24 hours.

BIO-7 Coastal California Gnatcatcher Avoidance:

A. No clearing, grubbing, grading, or other maintenance/construction activities shall occur between March 1 through August 15, the breeding season of the coastal California gnatcatcher, until the following requirements have been met to the satisfaction of the City Manager (or appointed designee):

1. A Qualified Biologist (possessing a valid Endangered Species Act Section 10(a)(1)(A) Recovery Permit) shall survey those habitat areas within the MHPA that would be subject to maintenance/construction noise levels exceeding 60 decibels (dBA) hourly average, or exceeding ambient noise levels if greater than 60 dBA, for the presence of the coastal California gnatcatcher. Surveys for the coastal California gnatcatcher shall be conducted pursuant to the protocol survey guidelines established by the USFWS within the breeding season prior to the commencement of any maintenance/construction activities with the potential to directly or indirectly impact gnatcatcher. If gnatcatchers are present, then the following conditions must be met:

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

II. Between March 1 and August 15, no maintenance/construction activities shall occur within any portion of the Program area where activities would result in noise levels exceeding 60 dBA hourly average or ambient, whichever is higher, at the edge of occupied gnatcatcher habitat. An analysis showing that noise generated by maintenance/construction activities would not exceed 60 dBA hourly average or ambient (whichever is higher) at the edge of occupied habitat must be completed by a qualified acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the City Manager (or appointed designee) at least two weeks prior to the commencement of maintenance/construction activities. Prior to the commencement of maintenance/construction activities during the breeding season, areas restricted from such activities shall be staked or fenced under the supervision of a Qualified Biologist; or

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

California gnatcatcher. Concurrent with the commencement of construction activities and the construction of necessary noise attenuation facilities, noise monitoring* shall be conducted at the edge of the occupied habitat area to ensure that noise levels do not exceed 60 dBA or ambient (whichever is higher) hourly average. If the noise attenuation techniques implemented are determined to be inadequate by the qualified acoustician or biologist, then the associated construction activities shall cease until such time that adequate noise attenuation is achieved or until the end of the breeding season (August 16).

**Construction noise monitoring shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the maintenance/construction activity, to verify that noise levels at the edge of occupied habitat are maintained below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. If not, other measures shall be implemented in consultation with the biologist and the City Manager (or appointed designee), as necessary, to reduce noise levels to below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. Such measures may include, but are not limited to, limitations on the placement of construction equipment and the simultaneous use of equipment.*

2. If coastal California gnatcatchers are not detected during the protocol survey, the Qualified Biologist shall submit substantial evidence to the City Manager (or appointed designee) and applicable Resource Agencies that demonstrates whether or not mitigation measures, such as noise walls, are necessary between March 1 and August 15 as follows:

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

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

BIO-8 Least Bell's Vireo and Southwestern Willow Flycatcher Avoidance and Mitigation:

A. Impacts to riparian habitat occupied by least Bell's vireo shall be mitigated in-kind at ratios provided in Table 2A of the City's Biology Guidelines.

B. No clearing, grubbing, grading, or other maintenance/construction activities shall occur within 500 feet of riparian habitat during the least Bell's vireo breeding season (March 15 through September 15) or southwestern willow flycatcher breeding season (May 1 through September 1) until the following requirements have been met to the satisfaction of the City Manager (or appointed designee):

1. A Qualified Biologist (possessing a valid Endangered Species Act Section 10(a)(1)(A) Recovery Permit when required) shall survey those habitat areas that would be subject to maintenance/construction noise levels exceeding 60 decibels (dBA) hourly average for the presence of the least Bell's vireo and southwestern willow flycatcher.

Surveys for this species shall be conducted pursuant to the protocol survey guidelines established by the U.S. Fish and Wildlife Service within the breeding season prior to the commencement of maintenance/construction. If vireos or flycatchers are present, then Condition I and either II or III must be met:

I. Between March 15 and September 15 for least Bell's vireo and May 1 through September 1 for southwestern willow flycatcher, no clearing, grubbing, or grading of occupied vireo habitat shall be permitted. Areas restricted from such activities shall be staked or fenced under the supervision of a Qualified Biologist; AND

II. Between March 15 and September 15 for least Bell's vireo and May 1 through September 1 for southwestern willow flycatcher, no maintenance/construction activities shall occur within any portion of the site where maintenance/ construction activities would result in noise levels exceeding 60 dBA hourly average at the edge of occupied habitat. An analysis showing that noise generated by maintenance/construction activities would not exceed 60 dBA hourly average at the edge of occupied habitat must be completed by a Qualified Acoustician (possessing current noise engineer license or registration with monitoring noise level experience with listed animal species) and approved by the City Manager (or appointed designee) at least two weeks prior to the commencement of maintenance/construction activities. Prior to the commencement of any maintenance/construction activities during the breeding season, areas restricted from such activities shall be staked or fenced under the supervision of a Qualified Biologist; OR

III. At least two weeks prior to the commencement of maintenance/construction activities, under the direction of a qualified acoustician, noise attenuation measures shall be implemented to ensure that noise levels resulting from maintenance/construction activities will not exceed 60 dBA hourly average at the edge of occupied habitat.

2. If least Bell's vireos or southwestern willow flycatcher are not detected during the protocol survey, the Qualified Biologist shall submit substantial evidence to the City Manager (or appointed designee) and applicable Resource Agencies that demonstrates whether or not mitigation measures such as noise walls are necessary between March 15 and September 15 for least Bell's vireo and May 1 through September 1 for southwestern willow flycatcher as follows:

I. If this evidence indicates the potential is high for least Bell's vireo and/or southwestern willow flycatcher to be present based on historical records or site conditions, then Condition A.III shall be adhered to as specified above.

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

BIO-9 Special Status Avian Species Protection Requirements: To avoid any direct impacts to any species identified as a listed, candidate, sensitive, or special status species in the City's

Multiple Species Conservation Plan, including but not limited to southwestern willow flycatcher, coastal cactus wren, Cooper's hawk, and northern harrier, removal of habitat that supports active nests in the proposed area of disturbance shall occur outside of the breeding season for these species (January 1 to July 15 for raptors; February 1 to September 15 for all other avian species). If Program activities that involve the clearing of vegetation must occur within the breeding season, a pre-construction survey shall be conducted by a Qualified Biologist no more than seven days prior to the commencement of the activities in areas supporting suitable habitat to determine the presence or absence of nesting birds or raptors within the proposed area of disturbance. If the Qualified Biologist determines that no active nesting birds or raptors are present within the proposed area of disturbance, the activities shall be allowed to proceed. If the Qualified Biologist determines that an active bird or raptor nest is present, 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, appropriate nest setbacks, maintenance/ 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. Appropriate nest setbacks shall be implemented as determined by the City's Biology Guidelines, or by a Qualified Biologist if no defined setback is provided in the Biology Guidelines. City-defined avoidance setbacks within the Multi-Habitat Planning Area are 300 feet for nesting Cooper's hawk and 900 feet for nesting northern harrier. No impacts shall occur within the setback area until the young have fledged the nest and the nest is confirmed to no longer be active, as determined by the Qualified Biologist. 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 Manager (or appointed designee) and Qualified Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during applicable Program activities.

BIO-10 Bat Roost Avoidance:

A. Program activities with the potential to impact suitable roosting habitat for bats, including but not limited to removal of trees or repair of cracks in cement or rocks at least six mm wide, shall not commence until the following requirements have been met to the satisfaction of the City Manager (or appointed designee):

    1. During the bat maternity season (April 15 through August 15), a Qualified Biologist with at least three years of experience conducting bat surveys and acoustic monitoring shall conduct a one-night emergence survey during suitable weather conditions (no rain or high winds, night temperatures above 55°F), or if conditions permit, physically examine potential roost sites for presence or absence of bats, within three days prior to the commencement of maintenance/construction activities.

        I. If bats are detected and determined to be roosting within the area proposed for maintenance, maintenance/construction activities within 100 feet of the roost site shall be avoided until after the maternity season (August 15) or when the young are self-sufficiently volant (able to fly).

II. If bats are not detected during the pre-construction survey or determined to be absent from the area proposed for maintenance, maintenance/construction activities shall be allowed to proceed, and no additional measures would be necessary.

2. Outside of the bat maternity season (August 16 through April 14), a Qualified Biologist with experience conducting day roosting surveys for bats will physically examine cavities and other potential roost sites, as conditions permit, for the presence or absence of bats within three days prior to the commencement of maintenance/construction activities.

   I. If bats are detected and determined to be roosting within the area proposed for maintenance during the winter months when bats are in torpor (October 31 through February 15), maintenance/construction activities within 100 feet of the roost site shall be avoided until after the winter season when bats are once again active.

   II. If bats are detected and determined to be roosting within the area proposed for maintenance outside of both the winter months and bat maternity season (i.e., maintenance activities conducted between August 16 through October 30, and February 16 through April 14), maintenance/construction activities within 50 feet of the roost site shall be avoided until bats are no longer determined to be roosting within the proposed area for maintenance as determined by the qualified bat biologist.

   III. If bats are not detected during the pre-construction survey or determined to be absent from the area proposed for maintenance, maintenance/construction activities shall be allowed to proceed, and no additional measures would be necessary.

NOISE

NOI-1 Construction Noise Management Plan. Noise from project construction activities shall comply with the thresholds and hours specified by the City of San Diego and County of San Diego. Construction shall not occur outside the hours of 7:00 a.m. and 7:00 p.m. Construction noise shall not exceed 75 dBA L_{EQ} (8 hour) at nearby residential land uses in the County of San Diego and 75 dBA L_{EQ} (12 hour) at residential land uses in the City of San Diego.

If work is conducted within the setback distances found in Table 3 of this Program's Initial Study, noise levels may exceed the thresholds at a given work site. Appropriate measures shall be implemented to reduce construction noise including, but not be limited to, the following:

- Construction equipment shall be properly outfitted and maintained with manufacturer-recommended noise-reduction devices.

- Diesel equipment shall be operated with closed engine doors and equipped with factory-recommended mufflers.

- Mobile or fixed "package" equipment (e.g., arc-welders and air compressors) shall be equipped with shrouds and noise control features that are readily available for that type of equipment.

- Electrically powered equipment shall be used instead of pneumatic or internal combustion powered equipment, where feasible.

- Unnecessary idling of internal combustion engines (e.g., in excess of 5 minutes) shall be prohibited.

- The use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only.

- Any truck or equipment equipped with back-up alarm moving within 300 feet of a noise-sensitive land use should have the normal back-up alarm disengaged and safety provided by lights and flagman or broad-spectrum noise backup alarm (as appropriate for conditions) used in compliance with the Occupational Safety and Health Administration safety guidelines.

- If a temporary barrier is used, all barriers shall be solid and constructed of wood, plastic, fiberglass, steel, masonry, or a combination of those materials, with no cracks or gaps through or below the wall. Any seams or cracks must be filled or caulked. If wood is used, it can be tongue and groove or close butted seams and must be at least ¾-inch thick or have a surface density of at least 3.5 pounds per square-foot. Sheet metal of 18-gauge (minimum) may be used if it meets the other criteria and is properly supported and stiffened so that it does not rattle or create noise itself from vibration or wind. Noise blankets, hoods, or covers also may be used, provided they are appropriately implemented to provide the required sound attenuation.

- A noise monitor shall be provided to ensure noise levels do not exceed thresholds. The monitor, in cooperation with the on-site construction manager, shall have the authority to halt construction activities in the event that noise levels exceed thresholds. Monitors shall submit regular reports to the City documenting noise levels and compliance.

NOI-2 **Aircraft Noise**. Non-emergency use of helicopters for Program activities shall occur outside of the general bird breeding season (February 1 to September 15) when activities would occur within or adjacent to biologically sensitive habitat occupied by sensitive avian species as defined by the City's Biology Guidelines including, but not limited to, coastal California gnatcatcher and least Bell's vireo.

WILDFIRE

FIRE-1 Fire Safety Plan. The following fire prevention strategies would be implemented during Program construction:

- Construction within areas of dense foliage during dry conditions will be avoided, when feasible.

- In cases where avoidance is not feasible, brush fire prevention and management practices will be incorporated. Specifics of the brush management program will be incorporated into project construction documents.

VI. PUBLIC REVIEW DISTRIBUTION:

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

Federal Government
U.S. Army Corps of Engineers
U.S. Environmental Protection Agency
U.S. Fish & Wildlife Service

State of California
State Clearinghouse
California Department of Fish and Wildlife

City of San Diego
Mayor's Office (91)
Council President, District 9 (MS 10A)
Councilmember Campillo, District 7 (MS 10A)
Councilmember Von Wilbert, District 5 (MS 5)

Development Services Department
Jeff Szymanski, EAS
Catherine Rom, Development Project Manager
Phil Lizzi, LDR Planning Review
Andrea Navagato LDR- Landscape

Planning Department
Dan Monroe, MSCP

City Attorney (93C)

City of San Diego Libraries
Library Department - Government Documents (81)
Rancho Bernardo Branch Library (81aa)
Scripps Branch Library (MS 17)
City Heights Library (81ff)

Other Organizations, Groups, and Interested Individuals
Sierra Club (163)
San Diego Audubon Society (167)
Mr. Jim Peugh (167a)
Endangered Habitats League (182a)
Black Mountain Ranch (226c)
City Heights Area Planning Committee (287)
Rancho Bernardo Community Council (398)
San Pasqual (426)
Scripps Ranch Planning Group (437)
Navajo Community david.smith@eldpinc.com

VII. RESULTS OF PUBLIC REVIEW: (**CHECK BOX IF RETYPED FOR FINAL**)

( ) No comments were received during the public input period.

( ) Comments were received but did not address the accuracy or completeness of the draft environmental document. No response is necessary and the letters are incorporated herein.

( ) Comments addressing the accuracy or completeness of the draft environmental document were received during the public input period. The letters and responses are incorporated herein.

Copies of the draft Mitigated Negative Declaration, the Mitigation, Monitoring and Reporting Program and any Initial Study material are available in the office of the Development Services Department for review, or for purchase at the cost of reproduction.

Jeff Szymanski
NAME
TITLE
Development Services Department

12/27/2022
Date of Draft Report

Date of Final Report

Analyst: Jeff Szymanski

Attachments:

Exhibit A, Maintenance Plan
Appendix A: Air Quality and Greenhouse Gas Emissions Assessment
Appendix B: Biological Technical Report

Appendix C: City of San Diego Source Water System Historical Resources Assessment
Appendix D: Cultural Resources Technical Report
Appendix E: Noise Assessment Study

INITIAL STUDY CHECKLIST

1. Project title/Project number: Dam maintenance Program (Program) / 696140

2. Lead agency name and address: City of San Diego (City), 1222 First Avenue, MS-501, San Diego, California, 92101

3. Contact person and phone number: Jeffrey Szymanski / (619) 446-5324

4. Project location:

   Barrett Dam 19886 Japatul Lyons Valley Rd., Jamul, CA 91935
   Black Mountain Dam 14799 Black Mountain Rd., San Diego, CA 92129
   Chollas Dam 5350 College Grove Dr., San Diego, Ca 92115
   El Capitan Dam 16850 El Monte Rd., Lakeside, CA 92040
   Hodges Dam 20175 Lake Dr., Escondido, CA 92029
   Miramar Dam: 10710 Scripps Lake Dr., San Diego, CA 92131
   Morena Dam 2550 Lake Morena Dr., Campo, CA 91906
   Murray Dam 5540 Kiowa Dr., La Mesa, CA 91942
   Rancho Bernardo Dam 16061 Big Springs Way, San Diego, CA 91927
   San Vicente Dam 12387 Moreno Ave., Lakeside, CA 92040
   Savage Dam 1500 Wueste Rd., Chula Vista, CA 91915
   Sutherland Dam 22850 Sutherland Dam Rd., Ramona, CA 92065
   Upper Otay Dam 12161 Otay Lakes Rd., Chula Vista, CA 91915
   Dulzura Conduit 19886 Japatul Lyons Valley Rd., Jamul, CA 91935

   See location maps in Figure 1, *Regional Location*, and Figures 2a-1 through 2n-9, *Existing Facilities and Maintenance Footprint/Limits of Work*. These figures can be found in the attached Exhibit A, *Maintenance Plan*.

5. Project Applicant/Sponsor's name and address: City of San Diego Public Utilities Department, 9192 Topaz Way, MS 901A, San Diego, CA 92123

6. General/Community Plan designation: Residential/Black Mountain Ranch, Mid-City: Eastern Area, Navajo, Rancho Bernardo, San Pasqual, and Scripps Ranch Community Plans.

7. Zoning: Base Zone AR-1-1 (Black Mountain, Miramar, Murray, Rancho Bernardo Dams), AG-1-1 (Hodges Dam), OP-1-1 (Chollas Dam)

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.):

   SITE DEVELOPMENT PERMIT (SDP) for the proposed Program maintenance activities at 13 City-owned dams and associated infrastructure, including the approximately 13-mile Dulzura Conduit, located throughout San Diego County as part of the City's drinking water infrastructure. Each dam has a unique system of outlet works and spillway components to

control the reservoir water levels and to safely release water during severe storm events or impending dam failure. Associated dam infrastructure includes, but is not limited to, groins, toes, saddle dams, spillways and auxiliary spillways, training and parapet walls, outlet works, storm drain headwalls that are associated with the outlet works, and appurtenant structures. The City PUD is responsible for conducting maintenance and repair of these facilities.

These facilities are subject to the regulatory jurisdiction of the Division of Safety of Dams (DSOD), which is part of the California Department of Water Resources, under Division 3 of the California Water Code. The DSOD oversees dam safety in California with the goal of avoiding dam failure which could lead to potential loss of life and destruction of property. As part of the dam safety program, the DSOD completes detailed semi-annual inspections and provides an annual inspection report of the City's dams to identify maintenance activities such as vegetation removal, grading, dredging, and repairs to infrastructure and may request certain maintenance work to be performed to improve dam safety.

The proposed Program would cover the long-term maintenance of these facilities and includes maintenance activities that are routinely included in the DSOD annual inspection reports. As of recent, DSOD is in the process of providing a regulatory framework that could potentially penalize an agency through monetary fines should violations occur. The proposed Program provides the City oversight to address items in DSOD's inspection reports and avoid potential violations. The Program describes the maintenance methods and overall potential impacts that are anticipated to occur during the implementation of the Program. It also includes the protocols to address the impact of maintenance activities with respect to environmental resources.

Maintenance Activities

Maintenance activities covered under the proposed Program include the maintenance of access roads, access trails, and pedestrian footpaths, maintenance of staging and material storage areas, trimming and clearing of vegetation, dredging, maintenance of outlet/intake towers and trash racks, removal of debris along spillways and other appurtenant structures to provide a clear path and remove obstructions, maintenance and repair of the dams and appurtenant structures to prevent deterioration that could lead to dam failure, concrete maintenance and repairs, maintenance and replacement of piezometers and survey monuments, and geotechnical investigations, as described further below.

Access Road and Staging Area Maintenance

Under the proposed Program, existing access roads, access trails, pedestrian footpaths, and staging and material storage areas will continue to be maintained in a usable condition along the current path alignments and existing disturbed/developed footprints. No widening, expansion, relocation, or establishment of new access roads, access trails, footpaths, or staging areas are proposed as part of the Program. Routine maintenance activities include patching and minor surface repaving of paved access roads and trails and staging areas; patching and minimal grading of gravel and dirt access roads and trails and staging areas; filling of erosional voids, rills, and gullies caused by winter storms; and minor trimming of vegetation to remove overhanging branching and other encroaching vegetation.

Minor trimming of vegetation will also occur along footpaths, which are necessary to maintain pedestrian access to the toe of dams, dam leakage measuring structures, and weir and outlet work structures. Maintenance and repair activities along existing paved, gravel, and dirt access roads and trails will be limited to the current road width, generally 10 feet wide, and established road rights-of-way, where present. Maintenance of pedestrian footpaths will be limited to minor trimming of vegetation along the path alignment; no soil disturbance or removal of vegetation will occur as part of footpath maintenance. Maintenance and repair activities within staging and material storage areas will be limited to the current disturbed and developed footprints.

Access to the dams and associated infrastructure to complete maintenance activities covered under this Program, and detailed below, will occur along established access roads, access trails, and pedestrian footpaths. Any staging of equipment or materials required to complete activities will occur within existing staging and material storage areas, within disturbed and developed portions of the dam, or within existing developed lands on nearby City property at the reservoirs. These areas are maintained as parking and operational space for dam and reservoir maintenance staff. If direct access to outlet/intake towers from the dam is not available, crews, materials, and the necessary equipment to perform maintenance and repair activities, including dredging, will be transported to the outlet/intake towers utilizing a boat or barge launched from the reservoir's boat ramp.

Vegetation Clearing

Vegetation growing on and adjacent to the dams and associated infrastructure has potential to hinder site access and safety inspections, visually obstruct dam components, interfere with safe operations, damage critical infrastructure, and possibly lead to dam failure. Removal of vegetation and debris is critical to the functioning of the dams and associated infrastructure, and Dulzura Conduit, as vegetation could reduce design capacity and prevent proper inspection of infrastructure. Clearing of vegetation will continue to be conducted on a routine basis under this Program to keep the maintenance area free and clear of vegetation. This will avoid re-establishment of upland and wetland vegetation, as well as decrease the chances of introducing a new species into an existing maintenance area.

Vegetation clearing will be limited to the following activities and areas:

- Clearing of all vegetation located within at least 5 feet of Dulzura Conduit;
- Clearing of all vegetation located within 10 feet of the dams and associated infrastructure;
- Clearing of all marsh habitat (i.e., giant reed [*Arundo donax*], cattail [*Typha* spp.], bulrush [*Schoenoplectus* spp.], etc.) located within 10 feet of the dam;
- Removal of all trees located within 10 feet of the dams, saddle dams, parapet walls, and spillways;
- Removal of all eucalyptus (*Eucalyptus* spp.) trees located within 50 feet of the dam, saddle dams, parapet walls, and spillways;

- Clear and maintain all vegetation within 10 feet of all weirs; headwalls; blow-off and outlet valves; inlet and outlet pipes; discharge, leakage, and seepage pipes and associated discharge paths; and

- Maintain slopes surrounding Black Mountain and Rancho Bernardo Dams so that no trees are allowed to establish. The slopes will be maintained in their current condition so that only herbaceous vegetation and low-growing shrubs occur.

Clearing of vegetation on land surfaces will be limited to above ground level and the roots of all cut vegetation will be left in place to prevent soil disturbance and reduce potential erosion. Clearing of eucalyptus and other tree species will be completed by cutting trees at the base and treating the stumps with herbicide. Aquatic vegetation, such as cattails (*Typha* spp.) and bulrushes (*Schoenoplectus* spp.), will either be cut at the water surface, removed with mechanical equipment, or treated with an herbicide approved for aquatic use by the U.S. Environmental Protection Agency by a licensed applicator. Vegetation clearing work will be conducted with hand tools such as pole saws, chain saws, and weed eaters. Felled trees and aquatic vegetation will be removed from the area with the use of mechanized equipment (such as a bobcat, backhoe, or excavator), where feasible, and transported to an appropriate waste management facility for disposal. Felled trees in areas inaccessible to mechanized equipment will be removed via helicopter.

Dredging

Accumulated lake bottom sediment and debris covering dam infrastructure, such as lower saucer valve ports, will be removed through dredging to maintain operational function. Dredging will occur within a 50-foot radius of the outlet/intake tower base at Barrett, Chollas, El Capitan, Miramar, Morena, Murray, San Vicente, and Savage (Lower Otay) Dams, and within a 50-foot radius at the low-level outlet intake at Barrett, Hodges, and San Vicente Dams. The depth of dredging activities will be variable depending on site conditions.

There are two main dredging methods that will be employed under this Program: mechanical and hydraulic. Mechanical dredging typically involves a stationary, bucketed machine (such as a boom, clamshell, or backhoe) positioned on a barge that is lowered into the water to scoop up material. The dredged material is then raised above the water surface and deposited on a barge or other structure above the water surface. Hydraulic dredging utilizes a high-powered water pump to suction up material that is then pumped away from the dredge site. A dredging plan will be prepared and approved prior to the commencement of dredging activities at each location. The dredging plan will describe the scope of work, amount of material to be removed, method of dredging, equipment, access roads and points, staging area(s), duration and schedule, and protocols to be implemented. Dredged material will be removed from the reservoir and either disposed of at an appropriate disposal facility or reused in a beneficial capacity (e.g., agriculture).

Outlet Tower and Trash Rack Maintenance

Routine maintenance and minor repairs will occur to existing outlet/intake towers to maintain and improve the operational safety of the towers. Activities include filling cored holes on the operating platform; repairing the valve rack; repairing concrete spalls; applying

a top seal to waterproof and protect concrete surfaces and seal hairline cracks; coating metal covers, access ladders, and handrails to prevent corrosion; repair and replacement of access ladders; replacement of access hatches (in-kind); replacement of the safety chains across rails at the landing (in-kind); replacement or refurbishment of fall arrests; coating of the roof structural steel; and strengthening the concrete roof slab with the application of a fabric reinforced matrix. Equipment required to complete these activities will be limited to the use of manual and mechanical hand tools; no heavy machinery will be required. Additionally, trash racks will be regularly cleared, maintained, and kept free of debris that may block intake and outlet valves and other critical dam infrastructure hindering operational functionality.

Spillway Clearing

Accumulated debris such as dirt, rocks, boulders, and vegetation present on the spillways, spillway channels, and auxiliary spillways will be removed to maintain operational function and prevent damage to infrastructure. Debris will be removed by hand, where feasible, and heavy equipment including, but not limited to, a truck-mounted crane, rubber-wheeled front-end loader, track-mounted long arm excavator, track-mounted bobcat with jackhammer attachment, and dump trucks. Small equipment (such as a bobcat) will be lowered into the spillways and other appurtenant structures with a truck mounted crane to move the debris to a point where it can be accessed by a long-arm track-mounted excavator positioned at the top of the structure. Boulders will be broken up into manageable pieces with a hydraulic jackhammer to allow for removal. A track-mounted excavator will lift the debris from the spillway and appurtenant structures and place it in a dump truck to be hauled away and disposed of at a licensed landfill or stockpiled on-site within disturbed/developed areas of the dam. Spillway clearing activities will be contained within the unvegetated spillways and appurtenant structures, existing access roads, previously disturbed workspaces and staging areas, and disturbed and developed areas adjacent to the dams.

Removal of soil, debris, and vegetation along the El Capitan Dam spillway, lower dam spillway, and spillway channel will be conducted as part of the El Capitan Dam Spillway Vegetation Removal Project (Project No. 679843; State Clearing House No. 2022050039). Long-term maintenance of these areas will be covered under the El Capitan Dam Spillway Vegetation Removal Project and is not included as part of this Program.

Dam Maintenance and Repairs

Routine maintenance and minor repairs of the dams and appurtenant structures will occur to prevent deterioration and maintain the integrity and functionality of critical dam infrastructure. The 13 City-owned dams covered under this Program include four earthen dams (Chollas, El Capitan, Miramar, and Morena Dams), seven concrete dams (Barrett, Hodges, Murray, San Vicente, Savage, Sutherland, and Upper Otay Dams), and two concrete reservoirs (Black Mountain and Rancho Bernardo).

Maintenance of earthen dams includes filling of voids, gullies, and rills caused by erosion on the upstream and downstream faces of the dam, and minor grading and regular compaction of the dam face and toe of dam. Maintenance of concrete dams, reservoirs, and concreted

appurtenant structures at earthen and concrete dams (i.e., saddle dams, parapet walls, spillways, etc.) includes repairs such as sealing of all joints and cracks with gaps with a flexible sealant to prevent infiltration of water and buildup of stagnation pressures; repairing all degraded concrete, spalls, and boulder impact areas within the spillway (channel floor and walls) and dam face and walls by cutting-out existing material then replacing and patching material to prevent further damage; repair of spalled concrete on all elements of the dam, especially where reinforcing steel is exposed; and smoothing vertically-displaced joints on concrete surfaces by surface grinding or other approved methods.

Additionally, auxiliary infrastructure located on or within the dams will be maintained, repaired, and or replaced, including perimeter fencing, piezometers and survey monuments, ladders, micrometers, electronic level sensors, and other instrumentation. All maintenance and repairs activities will be performed on existing structures with work activities limited to disturbed and developed portions of the dam.

Dulzura Conduit

Routine maintenance and minor repairs of Dulzura Conduit will occur to prevent flow impairment through the conduit and to maintain design capacity. The Dulzura Conduit is an approximately 13-mile-long aqueduct constructed to divert water from Barrett Dam Reservoir to Lower Otay Reservoir through a series of canals, flumes, and tunnels. Water is released into the conduit through the Barrett Dam outlet tower by a 30-inch drainpipe. Upgrades to the conduit were completed in 2011 with a majority of the conduit now comprised of concrete channels and steel pipes. The average depth of the concrete trench segments is approximately four and a half feet, with a bottom width of three feet, and a top width of approximately six feet. The flume is a combination of enclosed metal flumes measuring approximately four feet in interior diameter, and board-formed poured concrete. Existing access roads and trails are constructed of decomposed granite, gravel, or concrete. Pedestrian footpaths primarily consist of dirt paths, and in some cases, small steel catwalks.

Maintenance activities along Dulzura Conduit involve the removal of landslide debris, rocks and boulders, and vegetation within the concrete conduit and repair of damaged or deteriorating sections of the existing conduit with in-kind materials. Repairs of the existing concrete conduit will be completed with shotcrete and include installation of reinforcing mesh, ground wires, and compound curing. The shotcrete will be broom finished by hand. Large boulders that are found to be blocking the conduit will be broken up into manageable pieces with the use of approved expansive chemical agents and/or mechanical equipment.

All inspection, repair, and maintenance activities along Dulzura Conduit will occur within the existing developed footprint of the conduit, pedestrian footpaths, and access roads and trails. The remote location of the conduit, rugged terrain, and limited vehicle access make typical maintenance activities challenging. Maintenance and construction personnel will access the site through existing access roads, access trails, and pedestrian footpaths. Helicopters will airlift supplies, equipment (i.e., mini excavator, bobcat, etc.), and debris that cannot be hand carried to and from the repair sites or removed with maintenance vehicles. Helicopter landing, materials, and equipment staging areas will be located within existing developed lands on nearby City property at Barrett Reservoir. These areas are maintained as parking and operational space for dam and reservoir maintenance staff.

Geotechnical Investigations

Subsurface geotechnical investigation of the dams, foundations, and associated infrastructure will occur as part of periodic condition assessments. Geotechnical investigations will include seismic stability analysis using modern techniques, penetration tests, and borings. The techniques used to perform the investigations will be limited to a small footprint within existing disturbed and developed areas associated with the dams and along access roads. No vegetation will be removed as part of the geotechnical investigation activities, and no native soil will be impacted as excavations will be conducted within disturbed soils of previously installed infrastructure (i.e., rockfill and concrete).

Frequency of Maintenance Activities

The frequency of maintenance activities will be based upon routine inspections and recommendations identified in the DSOD annual inspection reports. Factors influencing the timing and frequency of maintenance events include, but are not limited to, current conditions, past maintenance history, and risk assessment. In general, clearing of vegetation is anticipated to occur annually, though the extent of clearing will depend on the current conditions at each location. Other maintenance activities will occur on an as needed basis as directed by the DSOD and City PUD.

Maintenance activities may need to be conducted in the event of an emergency. "Emergency" means a sudden, unexpected occurrence, involving a clear and imminent danger, demanding immediate action to prevent or mitigate loss of, or damage to, life, health, property, or essential public services. Physical evidence, such as observation of surcharging conditions, blockages by debris/rocks/roots, or holes/cracks/offsets in dam infrastructure, or where impacts to vegetation, wetlands, and landforms have resulted from surcharging conditions (unanticipated water releases) will demonstrate emergency conditions.

Maintenance Implementation Procedures

Maintenance activities will commence upon approval of this Program and issuance of the Master SDP. However, maintenance activities located within waters and wetlands subject to the jurisdiction of the U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and/or California Department of Fish and Wildlife (CDFW) will commence upon issuance of the appropriate regulatory permits.

Exhibit A, *Maintenance Plan*, provides a detailed description of the Program procedures. A summary of the maintenance process is provided below.

Maintenance Determination Process

The maintenance determination process will begin with a review of information compiled by the City PUD and maintenance recommendations and mandates provided by DSOD. The City PUD will complete technical assessments of each facility and develop a maintenance plan for each planned activity, as determined necessary. The proposed maintenance activities will be reviewed and approved by the City PUD prior to initiation of activities. Maintenance activities

will be limited to the Program's maintenance footprint, as shown in Figures 2a through 2n of Exhibit A and will follow the methods and procedures as described in Exhibit A. Maintenance will occur on an annual to as-needed basis as directed by the City PUD and DSOD.

Maintenance Plan

If necessary, a site-specific maintenance plan will be prepared for the planned maintenance activity prior to the initiation of maintenance. The maintenance plan will describe the scope of work, limits of maintenance, maintenance method, equipment, access roads and points, staging area(s), duration and schedule, and protocols to be implemented. If dredging activities are to occur, a site-specific dredging plan will also be prepared. Maintenance crews and technical staff will use the maintenance plan to direct and limit maintenance activities within the appropriate work areas.

Technical Assessments

The City PUD will conduct site-specific technical assessments for each maintenance activity to determine if the activities will result in impacts to sensitive biological or historical resources. The assessment will include a description of the proposed maintenance activity(ies); summary of any field surveys completed; identification of any sensitive biological and historical resources present within the maintenance area, and those with potential to occur, if appropriate; description and quantification, as needed, of impacts to all sensitive biological and historical resources; and identification of any resource protection or avoidance measures. If the proposed maintenance activity(ies) were to result in impacts to sensitive biological resources or significant historical resources, the associated assessment will identify the mitigation measures and permit conditions to be implemented to minimize the impact(s) in accordance with the approved Mitigation and Monitoring Reporting Program (MMRP) and master permits, including regulatory permits, as applicable.

The Program will generally not involve any maintenance efforts that will generate issues related to geology and soils as routine maintenance and repair activities will not involve grading or excavation at sufficient depths or volumes that will affect geologic resources. However, maintenance activities such as geotechnical investigations (borings) or dredging may require preparation of a site-specific geotechnical investigation report to evaluate geologic hazards of that maintenance activity.

Permit Requirements and Mitigation Measures

Maintenance activities will occur within environmentally sensitive lands that support sensitive biological and jurisdictional waters and wetlands and will require the issuance of appropriate permits. As part of the environmental review process, mitigation measures will be developed and included in the Program's approved MMRP. The complete and final text of mitigation measures will be part of the certified Final Mitigated Negative Declaration (MND). The City is also pursuing programmatic regulatory permits with the required state (RWQCB and CDFW) and federal (USACE and USFWS) agencies to authorize activities proposed under this Program. These regulatory permits are anticipated to contain additional requirements such as notifications, receipt of letters of authorization, approval of compensatory mitigation, and implementation of pre-construction surveys and monitoring for sensitive

resources. Prior to implementation of maintenance or repair activities, the City will review and ensure compliance with all applicable maintenance procedures, mitigation measures, and regulatory permit requirements.

Substantial Conformance Review Process

City PUD will complete a review of maintenance and repair activities to confirm that work will be completed within the maintenance footprint described in this Plan and in conformance with the methods detailed in this Plan. Consistency with the Program's final environmental documents, mitigation measures, and conditions will be determined by City PUD in compliance with the applicable delegation of authority under CEQA provided by the City's Planning Department.

Maintenance or repair activity deviating from the maintenance activities and methods detailed in this Plan or located outside of the defined maintenance footprint will be submitted to the City's Development Services Department (DSD) for a Substantial Conformance Review (SCR) to determine if the activity is consistent with the Program's SDP. As part of the SCR process, DSD will determine if the planned maintenance activity deviating from the Program description or maintenance footprint is consistent with the SDP and applicable mitigation measures and conditions included in that permit. If DSD determines that maintenance activities substantially conform, work may proceed. Any maintenance activities or expansion in maintenance footprint that are not in substantial conformance will require a new or amended permit to address any new impacts that may occur and subsequent CEQA review.

Maintenance Implementation

Maintenance activities under this Program would commence once activities have been approved by the City PUD, as well as the state and federal agencies with jurisdiction over waterways and wetlands occurring within proposed maintenance areas. Maintenance activities would follow the methods and procedures as described in Exhibit A, *Dam Maintenance Program*.

Maintenance Reporting

An annual Program Monitoring Report summarizing any programmatic maintenance activities and associated mitigation measures (including the status of compensatory mitigation) that took place during the preceding year will be prepared and submitted to the designated City departments and state and federal agencies. This report will include a summary of biological resources impacted during maintenance and repair activities, any associated mitigation that occurred, and a summary of the status of mitigation which has been carried out during the current and previous years to compensate for impacts to upland and wetland vegetation, as well as special status species.

Program Approvals

Implementation of the maintenance activities included in the Program would require a variety of discretionary actions and approval by the City and resources agencies. Due to the

long-term nature of the Program, long-term (master) permits from the City, as well as state and federal agencies, are being sought to streamline the maintenance process. Long-term authorizations include an SDP (City of San Diego), Section 404 Permit (USACE), 1602 Streambed Alteration Agreement (CDFW), and Section 401 Certification (California RWQCB). If surface discharges of water are involved, maintenance will require a Wastewater Discharge Permit from the RWQCB. Impacts to state and/or federally listed species would also require appropriate approvals and permits including a Section 10(a) Permit or Section 7 Consultation by the U.S. Fish and Wildlife Service (USFWS). In the event of an emergency, after-the-fact permits which may be required by the City, state or federal agencies for emergency maintenance would be obtained.

9. Surrounding land uses and setting:

Facilities covered under the proposed Program area located throughout San Diego County. The Program area has been heavily modified and developed through the construction of previous stream impoundments (i.e., dams), reservoirs, and aqueducts for water storage and conveyance, along with surrounding residential, commercial, and recreational development. The location of each of these facilities are summarized below.

Barrett Dam

Barrett Dam is located in the eastern portion of the County, in the unincorporated community of Dulzura. It is located at the outlet of Barrett Reservoir along Barrett Lake Road to the north of Campo Road (State Route [SR] 94), south of Skye Valley Road, east of Lyons Valley Road, and west of Horizon View Drive. Barrett Dam, which consists of a single curved concrete gravity dam, was constructed between 1920 and 1922.

Black Mountain Dam

Black Mountain Dam is located in the northern portion of the City, in the community of Black Mountain Ranch. It is located to the south of Carmel Valley Road, east of Black Mountain Road, and north of Maler Road. Black Mountain Dam occurs within the City's Black Mountain Open Space Park. Black Mountain Dam, which consists of a concrete reservoir, was constructed between 2000 and 2003.

Chollas Dam

Chollas Dam is located in the central portion of the City. It is located at the outlet of Chollas Reservoir to the north of College Grove Road, south of Fauna Drive, east of Chollas Station Road, and west of College Grove Way. Chollas Dam, which consists of an earthen fill dam, was constructed between 1900 and 1901.

El Capitan Dam

El Capitan Dam is located in the eastern portion of the County, in the unincorporated community of Lakeside. It is located at the outlet of El Capitan Reservoir along El Monte Road to the north Interstate (I-) 8, south of Featherstone Canyon Road, east of Lake Jennings Road,

and west of Peutz Valley Road. El Capitan Dam, which consists of a hydraulic fill rock embankment, was constructed between 1932 and 1934.

Hodges Dam

Hodges Dam is located in the north portion of the City. It is located at the outlet of Hodges Reservoir to the north of Camino Santa Fe, south of Del Dios Road, east of Lake Drive, and west of Calle Ambiente. Hodges Dam, which consists of a concrete multiple arch buttress dam, was constructed between 1917 and 1919.

Miramar Dam

Miramar Dam is located in the northern portion of the City. It is located at the outlet of Miramar Reservoir to the north of Scripps Lake Drive, south and east of Scripps Ranch Boulevard, and west of Mira Lago Terrace. Miramar Dam, which consists of a zoned earth embankment, was constructed between 1959 and 1960.

Morena Dam

Morena Dam is located in the eastern portion of the County, in the unincorporated community of Lake Morena. It is located at the outlet of Morena Reservoir along Morena Reservoir Road, north of Hauser Creek Road, south of Skye Valley Road, and west of Lake Morena Drive. Morena Dam, which consists of a rock filled structure with a concrete face, was constructed between 1895 and 1912.

Murray Dam

Murray Dam is located in the eastern portion of the City. It is located at the outlet of Murray Reservoir to the north of Lake Murray Boulevard, south of Jackson Drive, east of Del Cerro Boulevard, and west of Baltimore Drive. Murray Dam, which consists of a concrete multiple arch dam, was constructed in 1918.

Rancho Bernardo Dam

Rancho Bernardo Dam is located in the northern portion of the City within the community of Rancho Bernardo. It is located to the north of Sun Summit Point, south of Cloudcrest Drive, east of Lofty Trail Drive, and west of Turtleback. Rancho Bernardo Dam, which consists of a concrete reservoir, was constructed between 1963 and 1964.

San Vicente Dam

San Vicente Dam is located in the central portion of the County, in the unincorporated community of Lakeside. It is located at the outlet of San Vicente Reservoir to the north of Morena Avenue, south of Foster Truck Trail, east of SR-67, and west of Muth Valley Road. San Vicente Dam, which consists of a concrete gravity raised dam, was constructed between 1941 and 1943 and raised between 2011 and 2014.

Savage Dam

Savage (Lower Otay) Dam is located in the southern portion of the County, in the unincorporated community of Otay. It is located at the outlet of Lower Otay Reservoir to the north of Alta Road, south of Otay Lakes Road, east of Wueste Road and Otay Lakes County Park, and west of the Otay Open Space Preserve. Savage Dam, which consists of a curved concrete gravity dam, and was constructed between 1917 and 1919.

Sutherland Dam

Sutherland Dam is located in the northern portion of the County, in the unincorporated community of Ramona. It is located at the outlet of Sutherland Reservoir along Sutherland Dam Road to the north of SR-78, south and east of Black Canyon Road, and west of Rancho Ballena Road. Sutherland Dam, which consists of a multiple arch concrete wall buttress dam, was constructed between 1927 and 1928.

Upper Otay Dam

Upper Otay Dam is located in the southern portion of the County, in the unincorporated community of Otay. It is located at the outlet of Upper Otay Reservoir to the north of Otay Lakes Road, south of Proctor Valley Road, east of Centennial Trail, and west of Wueste Road. Upper Otay Dam, which consists of a concrete arch dam, was constructed between 1896 and 1901.

Dulzura Conduit

The approximately 13-mile long Dulzura Conduit, also known as the San Diego City Conduit, is located in the eastern portion of the County, in the unincorporated community of Dulzura. The northern terminus of the Dulzura Conduit is located at Barrett Dam, and the southern terminus is located at the conduit's confluence with Dulzura Creek to the west of the Community Building Road and Flume Road intersection. The conduit traverses from Barrett Dam southward to Campo Road (SR-94), primarily along the eastern facing slopes west of Lake Barrett Road. The conduit then travels under Campo Road and continues in a westerly direction towards Dulzura Creek with the western underground portion paralleling Flume Road. Dulzura Conduit, which consists of an approximately 13-mile-long concrete aqueduct, was constructed between 1907 and 1909, and historically transported water from the Barrett Reservoir to Lower Otay reservoir through a series of canals, flumes, and tunnels.

Land uses within San Diego County vary between the urban areas along the coast and the more rural areas in the eastern regions. The majority of the land in the eastern portion of San Diego County is open space or undeveloped, while the majority of land along the coastal region is developed. Urban uses tend to consist of residential and commercial uses, as well as small-scale agricultural and industrial uses. Land uses that occur throughout San Diego County include low-density residential and commercial uses, agricultural operations, mineral resources and extraction, and undeveloped habitats, as well as national forest and state park lands. The Program area generally encompasses open space and recreation areas that are public or semi-public facilities situated within undeveloped, open space, rural, and residential areas. Barrett Dam, El Capitan Dam, Morena Dam, San Vicente Dam, Sutherland

Dam, and Dulzura Conduit are located in more rural or undeveloped areas. Black Mountain Dam, Chollas Dam, Hodges Dam, Miramar Dam, Murray Dam, Rancho Bernardo Dam, Savage Dam, and Upper Otay Dam are located in more urbanized areas, and in some cases, are completely surrounded by residential development.

Regional Context

In the context of the City's Multiple Species Conservation Program (MSCP) subarea plan (City 1997), Black Mountain Dam, Chollas Dam, Hodges Dam, Miramar Dam, Murray Dam, San Vicente Dam, Savage Dam, and Upper Otay Dam occur within the MHPA. Though Barrett Dam, El Capitan Dam, Morena Dam, Sutherland Dam, and Dulzura Conduit are located outside of the boundaries of the City's MSCP subarea plan, the dams and associated infrastructure are owned and operated by the City, and as such, will comply with the policies and guidelines of the City's MSCP subarea plan.

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 1602 Permit. Impacts to state and/or federal listed species would also require appropriate approvals and permits including a Section 10(a) Permit or Section 7 Consultation by the U.S. Fish and Wildlife Service.

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?

Consultation notification letters were sent to the Native American Tribes traditionally and culturally affiliated with the project area, including San Pasqual Band of Mission Indians, Jamul Indian Tribe and the Iipay Nation of Santa Ysabel. The San Pasqual Band of Mission Indians responded and requested further consultation, which was initiated, and concluded, in October 2022.

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

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

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

DETERMINATION: (To be completed by Lead Agency)

On the basis of this initial evaluation:

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

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

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

☐ The proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

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

EVALUATION OF ENVIRONMENTAL IMPACTS:

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

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

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

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

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

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

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

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

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

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

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

9) The explanation of each issue should identify:

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

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

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

In accordance with the City's CEQA Significance Determination Thresholds, Visual Quality/ Neighborhood Character impacts may result from projects whose bulk, scale, materials, or style are incompatible with surrounding development, or would substantially alter the existing or planned character of the area.

The proposed Program includes the long-term, routine maintenance of dams and associated infrastructure, including the Dulzura Conduit, at various locations throughout San Diego County. Activities would include maintenance of access roads, access trails, pedestrian footpaths, staging, and storage areas; trimming and clearing of vegetation; dredging; removal of debris and rocks; geotechnical investigations; and maintenance and repair of the dams and appurtenant structures. Individual maintenance activities may be located near, within, or visible from a scenic vista, but maintenance activities would be temporary and of short durations and would not involve the construction of permanent structures or the removal of existing structures. As such, impacts would be less than significant.

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

In accordance with the City's CEQA Significance Determination Thresholds, Visual Quality/Neighborhood Character impacts may result from projects whose bulk, scale, materials, or style are incompatible with surrounding development, or would substantially alter the existing or planned character of the area.

The proposed Program includes the long-term, routine maintenance of dams and associated infrastructure, including the Dulzura Conduit, in various locations throughout San Diego County. Activities would include maintenance of access roads, access trails, pedestrian footpaths, staging, and storage areas; trimming and clearing of vegetation; dredging; removal of debris and rocks; geotechnical investigations; and maintenance and repair of the dams and appurtenant structures. Maintenance activities would be temporary and of short durations, and would not involve the construction of permanent structures or the removal of existing structures. Clearing of vegetation and removal of debris, including the removal of rocks or boulders within the Dulzura Conduit, would be conducted as part of Program activities. Vegetation and rock removal for the Dulzura Conduit would be located within the vicinity of SR 94, and would be visible from the roadway. SR 94 is eligible to be listed as a State scenic highway, however work would be minimal and isolated to the existing developed footprints of the conduit, footpaths, access roads, and trails. Impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐

The proposed Program is limited to the long-term, routine maintenance of existing infrastructure and facilities and does not propose the new development of utilities or additional facilities. The physical activities associated with the Program have limited potential to impact the quality of scenic resources or existing visual character within the maintenance areas, as maintenance activities are limited to the areas within and immediately adjacent to existing developed footprints. Impacts would be less than significant.

While maintenance activities may require minor grading or dredging, no major earthwork is proposed that would significantly alter the visual character of the dam locations. Furthermore, the Program's maintenance activities would not be located in urbanized areas and would not conflict with applicable zoning or other regulations governing scenic quality. Impacts would be less than significant.

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

Per the City's Thresholds, projects that would emit or reflect a significant amount of light and glare may have a significant impact. To meet this significance threshold, one or more of the following must apply:

a. The project would be moderate to large in scale, more than 50 percent of any single elevation of a building's exterior is built with a material with a light reflectivity greater than 30 percent (see LDC Section 142.07330(a)), and the project is adjacent to a major public roadway or public area.

b. The project would shed substantial light onto adjacent, light-sensitive property or land use, or would emit a substantial amount of ambient light into the nighttime sky. Uses considered sensitive to nighttime light include, but are not limited to, residential, some commercial and industrial uses, and natural areas

The Program is limited to the long-term, routine maintenance of existing infrastructure and does not propose the new development of utilities or additional facilities. As such, no major structures or new lighting are proposed that, if constructed, would be incompatible with the existing visual character of natural resource areas. Dam maintenance equipment and ground-level features would typically be in use during the daytime hours, and nighttime lighting, if used, would be temporary. Impacts would be less than significant.

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

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

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

Agricultural land is rated according to soil quality and irrigation status; the best quality land is called Prime Farmland. Unique farmland is land, other than prime farmland, which has combined conditions to produce sustained high quality and high yields of specialty crops. Farmland of Statewide Importance may include tracts of land that have been designated for agriculture by State law. In some areas that are not identified as having national or statewide importance, land is considered to be Farmland of Local Importance. The Farmland Mapping and Monitoring Program (FMMP) maintained by the California Department of Conservation (CDC) is the responsible state agency for overseeing the farmland classification. In addition, the City's Thresholds state that in relation to converting designated farmland, a determination of substantial amount cannot be based on any one numerical criterion (i.e., one acre), but rather on the economic viability of the area proposed to be converted. Another factor to be considered is the location of the area proposed for conversion.

The Program does not propose construction or expansion of current facilities beyond those currently in place. Individual maintenance activities would occur at multiple locations within San Diego County. Due to the Programmatic nature of the proposed activities, there is the potential for future maintenance activities to be located on or adjacent to farmland pursuant to the FMMP. However, the proposed maintenance activities would not result in a change in land use of these sites, and they would not result in the conversion of agricultural lands to a non-agricultural use. As such, no impact would occur.

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

The Program would not install new uses that would conflict with the existing zoning of a site, and no Program maintenance areas are located under a Williamson Act contract. Herbicides would be used for specific applications, such as applied to tree stumps or for individual plants, avoiding impacts to regional agricultural activities. No impact would occur.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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))?	☐	☐	☐	☒

There is potential for Program activities to be located within forest land or timberland since the Program area occurs across the entire region. However, the proposed maintenance activities would be consistent with existing zoning because it would not propose a rezone of property. Furthermore, San Diego County does not contain any existing Timberland Production Zones. No impact would occur.

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

Implementation of the proposed Program would not result in a change to existing land uses or the disturbance, loss, or conversion of forest land resources to a non-forest use. Therefore, no impact would occur.

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

The proposed Program includes the long-term, routine maintenance of existing dams and associated infrastructure at various locations throughout San Diego County. Activities would include maintenance of access roads, pedestrian footpaths, staging, and storages areas; trimming and clearing of vegetation; dredging; removal of debris and rocks; geotechnical investigations; and maintenance and repair of the dams and appurtenant structures. The Program does not propose construction or expansion of current facilities beyond those currently in place. Individual maintenance activities would occur at multiple locations within San Diego County. Due to the Programmatic nature of the proposed activities, there is the potential for future maintenance activities to be located on or adjacent to farmland or forestland, but the proposed maintenance activities would not result in a change in land use of these sites, and they would not result in the conversion of lands to a non-forest or non-agricultural use. Therefore, no agricultural or forestry resources would be impacted by the proposed Program.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY – Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied on to make the following determinations – Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐

According to the City's Thresholds, a project may have a significant air quality impact if it could conflict with or obstruct implementation of the applicable air quality plan.

The proposed Program is located within the San Diego Air Basin (SDAB). Air quality in the SDAB is regulated by the San Diego Air Pollution Control District (SDAPCD). The SDAPCD is the government agency that regulates sources of air pollution within the County. Currently, the SDAB is in "non-attainment" status for criteria pollutants ozone (O_3), 10-micron or less particulate matter (PM_{10}), and 2.5-micron or less particulate matter ($PM_{2.5}$). The SDAPCD and San Diego Association of Governments (SANDAG) are responsible for developing and implementing the clean air plan for attainment and maintenance of the ambient air quality standards in the SDAB. The regional air quality plan for the County is SDAPCD's 2020 Plan for Attaining the National Ambient Air Quality Standards for Ozone in San Diego County (Attainment Plan; SDAPCD 2020). An Air Quality and Greenhouse Gas Emissions Letter was prepared by HELIX Environmental Planning, Inc. for the proposed Program (HELIX 2022a; Appendix A). The Program's maintenance activity emissions were estimated using equipment assumptions and emissions factors described in the Air Quality and Greenhouse Gas Emissions Letter (Appendix A). The Program would be inconsistent with the Attainment Plan if it is inconsistent with the population and employment growth assumptions within the County's General Plan or if the Program's emissions would exceed the applicable SDAPCD thresholds below in Table 1, *Maximum Daily Emissions*.

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

Table 1
MAXIMUM DAILY EMISSIONS

Facility	VOC[1]	NO_X[1]	CO[1]	SO_X[1]	PM_{10}[1]	$PM_{2.5}$[1]
Barrett	20.0	6.7	54.1	<0.1	0.4	0.3
Black Mountain	19.8	4.3	50.3	<0.1	0.4	0.3
Chollas	20.0	6.7	54.1	<0.1	0.2	0.2
El Capitan	20.2	9.1	56.1	<0.1	0.4	0.3
Hodges	20.0	6.7	54.1	<0.1	0.4	0.4
Miramar	20.2	9.1	56.1	<0.1	0.4	0.3
Morena	20.3	9.8	57.4	<0.1	0.4	0.4
Murray	20.3	9.8	57.4	<0.1	0.5	0.4
Rancho Bernardo	13.0	0.4	32.1	<0.1	0.5	0.4
San Vicente	20.2	9.1	56.1	<0.1	0.1	0.0
Savage	20.3	9.8	57.4	<0.1	0.4	0.4
Sutherland	20.2	9.1	56.1	<0.1	0.5	0.4
Upper Otay	20.2	9.1	56.1	<0.1	0.4	0.4
Dulzura Conduit	19.5	11.5	49.1	<0.1	0.4	0.4
Maximum Daily Emissions	**20.3**	**11.5**	**57.4**	**<0.1**	**0.5**	**0.4**
SDAPCD Thresholds	*137*	*250*	*550*	*250*	*100*	*67*
Exceed Thresholds?	***No***	***No***	***No***	***No***	***No***	***No***

Source: HELIX 2022a. Calculations using emission factors from CARB emissions inventory and USEPA AP-42
[1] Pollutant Emissions (pounds per day).
VOC = volatile organic compound; NO_X = nitrogen oxides; CO = carbon monoxide; SO_X = sulfur oxides; PM_{10} = particulate matter 10 microns or less in diameter; $PM_{2.5}$ = particulate matter 2.5 microns or less in diameter; SDAPCD = San Diego County Air Pollution Control District

As shown, the Program's maintenance activities would not result in pollutant emissions exceeding applicable thresholds. Because emissions would be below the applicable thresholds, and because the Program would only involve ongoing maintenance of existing facilities and would not result in population or employment increases, the Program would not conflict with or obstruct implementation of the Attainment Plan for the SDAB and impacts would be less than significant.

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

The Program's maintenance activity emissions were estimated using equipment assumptions and emissions factors, as described above. The emissions generated from maintenance activities would include: dust (including PM_{10} and $PM_{2.5}$) primarily from fugitive sources such as soil disturbance and vehicle travel over unpaved surfaces; and combustion emissions of air pollutants (including reactive organic gases [ROG], nitrogen oxides [NO_X], PM_{10}, $PM_{2.5}$, carbon monoxide [CO], and sulfur oxides [SO_X]), primarily from: operation of heavy off-road equipment; operation of gasoline powered hand equipment; on-road worker commute vehicle traveling to and from the maintenance activity sites; trucks hauling equipment, material, and debris to and from the maintenance activity sites; and operation of a helicopter during maintenance of the Dulzura Conduit. The results of the calculations

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

for Program maintenance activities are shown above in Table 1. The data are presented as the maximum anticipated daily emissions for comparison with the SDAPCD thresholds. As shown in Table 1, the maximum daily emissions would occur during maintenance activities for the Dulzura Conduit. The Program's emissions would not exceed SDAPCD thresholds and would not result in a cumulatively considerable net increase of any criteria pollutant. Impacts would be less than significant.

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

Sensitive populations (i.e., children, senior citizens, and acutely or chronically ill people) are more susceptible to the effects of air pollution than are the general population. Sensitive receptors in the vicinity of maintenance activities include residences and schools. Program maintenance activities would result in emissions of diesel particulate matter (DPM). The amount to which the receptors could be exposed, which is a function of concentration and duration of exposure, is the primary factor used to determine health risk. Current models and methodologies for conducting cancer health risk assessments are associated with longer-term exposure periods (typically 30 years for individual residents) and are best suited for evaluation of long duration toxic air contaminant (TAC) emissions with predictable schedules and locations. These assessment models and methodologies do not correlate well with the temporary and highly variable nature of maintenance activities. Typical annual maintenance activities at each facility are anticipated to last less than two weeks. The use of heavy diesel-powered equipment during maintenance would only occur near any individual receptor for a few days. Due to the variable and sporadic nature of the maintenance activities, and the anticipated short annual duration, TAC emissions from the Program's maintenance activities would not expose sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

The Program could produce odors during maintenance activities resulting from heavy diesel equipment exhaust; however, standard best management practices to minimize equipment idling and maintain equipment would minimize the odor emissions and their associated impacts. Any odors emitted during maintenance activities would be temporary, short-term, and intermittent in nature, and would cease upon the facility maintenance. Therefore, odor impacts from maintenance activities would be less than significant due to the duration of exposure.

IV. BIOLOGICAL RESOURCES – Would the project:

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

As described in the Program's Biological Technical Report (BTR; HELIX 2022b; Appendix B), several special status plant and animal species were observed in the Program area during biological surveys.

The Program is specifically limited to routine maintenance and repairs of critical infrastructure as directed by the DSOD. Program impacts would primarily occur in existing developed and disturbed areas associated with the dams, appurtenant structures, and existing access roads, trails, and footpaths (Figures 14a-14n) of the Program's BTR (Appendix B). However, portions of the proposed maintenance footprint extend into adjacent native habitats, including wetland and riparian habitats and sensitive uplands habitats, where special status plant and animal species have been detected or have potential to occur. Potential Program effects on special status plant and animal species are described below.

Special Status Plant Species

Implementation of the Program has potential to result in direct impacts to nine special status plant species: Dean's milk vetch, San Diego County sunflower, delicate clarkia, San Diego barrel cactus, pride of California, Cooper's rein orchid, Engelmann oak, ashy spike-moss, and rush-like bristleweed. Such impacts would be a result of maintenance impacts involving the removal of vegetation. These impacts are described below.

Federally or State Listed Plant Species

No impacts would occur to federally and/or state listed plant species as none were documented within the Program area.

Special Status Plant Species

Implementation of the Program has potential to result in direct impacts to nine special status plant species: Dean's milk vetch, San Diego County sunflower, delicate clarkia, San Diego barrel cactus, pride of California, Cooper's rein orchid, Engelmann oak, ashy spike-moss, and rush-like bristleweed. Impacts would be a result of maintenance activities involving the removal of vegetation.

CRPR 1 or 2 Plant Species

Generally, impacts to plant species with a California Native Plant Society (CNPS) California Rare Plant Rank (CRPR) of 1 or 2 are considered potentially significant due to their higher sensitivity status, and the impact analysis evaluates substantial adverse effects to these species. Implementation of the Program is anticipated to result in direct impacts to the following special status plant species with a CRPR of 1 or 2: Dean's milkvetch, delicate clarkia, and San Diego barrel cactus.

Dean's Milkvetch

Dean's milkvetch has a CRPR of 1B.1. Approximately 10 individuals of Dean's milk vetch are located within the proposed maintenance footprint at Dulzura Conduit. Maintenance activities proposed in this area include the clearing of vegetation within five feet of the conduit and maintenance of access

roads, trails, and footpaths. Potential impacts to these 10 individuals would be considered less than significant because of the low number of individuals that would be affected, the presence of the species within the surrounding area, and because such impacts would not jeopardize the status of the species in the region or result in a future elevated listing of the species.

Delicate Clarkia

Delicate clarkia has a CRPR of 1B.2. Approximately 17 delicate clarkia plants were located within the proposed maintenance footprint at Barrett Dam, 100 plants are located within the proposed maintenance footprint at El Capitan Dam, and another 1,114 plants are located within the proposed maintenance footprint for Dulzura Conduit. Maintenance activities proposed in these areas include the clearing of vegetation within 10 feet of Barrett Dam, El Capitan Dam, and appurtenant structures; clearing of vegetation within 5 feet of Dulzura Conduit; and maintenance of access roads, trails, and footpaths. Potential impacts to delicate clarkia would be less than significant based on the large number of individuals that would be avoided and the prevalence of species within the surrounding area, as illustrated by the high number of individuals observed within the study area footprint and additional suitable habitat present in the vicinity (such as along Cottonwood Creek). Program impacts would not jeopardize the status of the species in the region or result in a future elevated listing of the species.

San Diego Barrel Cactus

San Diego barrel cactus has a CRPR of 2B.1 and is a City MSCP Covered species. Approximately 43 individuals of San Diego barrel cactus are located within the proposed maintenance footprint at Savage Dam. Maintenance activities proposed in this area include the clearing of vegetation within 10 feet, and the removal of eucalyptus trees within 50 feet, of the dam and appurtenant structures, and maintenance of access roads, trails, and footpaths. Maintenance activities are not anticipated to result in direct impacts to San Diego barrel cactus, as these activities would be limited to the above ground cutting of vegetation and eucalyptus trees. Maintenance activities are not anticipated to result in direct impacts to San Diego barrel cactus, as these activities would be limited to the above ground cutting of vegetation and eucalyptus trees. If direct impacts to San Diego barrel cactus are determined to be unavoidable, such impacts would be less than significant based on the small number of individuals likely to be affected, the prevalence of the species within the surrounding area, and because such impacts would not jeopardize the status of the species in the region or result in a future elevated listing of the species. Therefore, potential Program impacts to San Diego barrel would be less than significant.

CRPR 3 or 4 Plant Species

CRPR 3 and 4 species are relatively widespread and impacts to such species would not substantially reduce their populations in the region and are not significant. Implementation of the Program is anticipated to result in direct impacts to the following special status plant species with a CRPR of 3 or 4: ashy spike-moss, Cooper's rein orchid, Engelmann oak, pride of California, San Diego County sunflower, and rush-like bristleweed.

Ashy Spike-Moss

A single small patch of ashy spike-moss is located within the proposed maintenance footprint at Savage Dam. Maintenance activities proposed in this area include the clearing of vegetation within 10 feet, and removal of eucalyptus trees within 50 feet, of the dam and appurtenant structures, and maintenance of access roads, trails, and footpaths. Direct impacts to this species are not anticipated to occur, as the single occurrence within the proposed maintenance footprint is located within an area designated for the removal of eucalyptus trees. These activities are limited to above-ground cutting of vegetation and would not involve grubbing or other ground disturbance activities. As such, potential impacts would be less than significant due to the low sensitivity of the species, low number of individuals with the potential to be affected, general prevalence within the vicinity, and preservation within adjacent lands located in the MHPA, including City PUD cornerstone lands surrounding Upper and Lower Otay Reservoirs.

Cooper's Rein Orchid

Approximately two Cooper's rein orchid plants are located within the proposed maintenance footprint at the Dulzura Conduit near Trail 3. Maintenance activities proposed in this area include clearing of vegetation within five feet of the conduit and maintenance of access roads, trails, and footpaths. Impacts to Cooper's rein orchid would be less than significant based on the low number of individuals with the potential to be impacted and the low sensitivity of the species.

Engelmann Oak

A single Engelmann oak tree is located within the proposed maintenance footprint at Dulzura Conduit within the discharge channel at the western end of the conduct alignment at Community Building Road. Maintenance activities proposed in this area include the clearing of vegetation within five feet of the discharge channel and maintenance of access roads, trails, and footpaths. Maintenance activities are not anticipated to result in direct impacts or removal of the Engelmann oak tree, as the oak is located at the periphery of the maintenance boundary in an upslope area outside of the discharge channel and does not impede flows within the channel. Though minor trimming of the oak tree is not anticipated, trimming may occur if overhanging branches are found to impede safe access to the channel or cause damage to the perimeter fencing surrounding the discharge channel. Minor trimming of vegetation would only be implemented on an as-needed basis and would be the minimum amount necessary. Impacts from minor trimming of vegetation would be less than significant due to the negligible area involved and the selective nature of the trimming. As such, potential impacts to Engelmann oak would be less than significant.

Pride of California

Approximately six pride of California plants are located within the proposed maintenance footprint at Dulzura Conduit. Maintenance activities proposed in this area include the clearing of vegetation within five feet of the conduit and maintenance of access roads, trails, and footpaths. Impacts to pride of California would be less than significant based on the low number of individuals with the potential to be impacted, continued presence within the surrounding area, and the low sensitivity of the species.

San Diego County Sunflower

San Diego County sunflower shrubs are located within the proposed maintenance footprint of several of the Program components as scattered individuals, small patches, and a dominant shrub component within vegetation. Potential impacts to San Diego County sunflower include 0.05 acre at Miramar Dam, 0.03 acre at Murray Dam, 1.2 acres at San Vicente Dam, approximately 386 shrubs at Savage Dam, and approximately 8,826 shrubs at Dulzura Conduit. Maintenance activities proposed in these areas include the clearing of vegetation within 10 feet of the dams and appurtenant structures, removal of eucalyptus trees within 50 feet of Savage Dam and appurtenant structures, clearing of vegetation within five feet of Dulzura Conduit, and maintenance of access roads, trails, and footpaths. Program impacts to San Diego County sunflower would be less than significant, as the local long-term survival of the species would not be impacted as this relatively widespread species is known to occur elsewhere in the Program vicinity. The impacted individuals are not part of a population at the periphery of the species' range, located in an area where the taxon is especially uncommon, or occurring on unusual substrates. Lastly, there are numerous documented occurrences of this species within the Program area and throughout the region, including on MHPA lands, indicating that the Program does not represent a geographically significant population.

Rush-like Bristleweed

Approximately 230 individuals of rush-like bristleweed are located within the proposed maintenance footprint at Dulzura Conduit. Maintenance activities proposed in this area include the clearing of vegetation within five feet of the conduit and maintenance of access roads, trails, and footpaths. Program impacts to rush-like bristleweed would be less than significant as this is a relatively widespread species within the area. The impacted individuals are not part of a population at the periphery of the species' range, located in an area where the taxon is especially uncommon, or occurring on unusual substrates. Additionally, this species is relatively common in the surrounding area, and the Program area does not represent a geographically significant population.

Other Special Status Plant Species

Implementation of the proposed Program is not anticipated to result in impacts to other special status plant species known from, or with high potential to occur, in the Program area. These species are expected to be avoided by Program activities due either to the species' location being outside of the proposed maintenance footprint, or the lack of suitable conditions (habitat, soils, hydrology, elevations, etc.) within the maintenance footprint. However, due to the long-term nature of the Program, there are potential additional or new populations of special status plant species to be discovered in the future, including City Narrow Endemic species. Program impacts to special status plant species may be considered significant and require mitigation depending on the species, sensitivity, and the number of plants to be impacted. Implementation of mitigation measure **BIO-3** would reduce potential impacts to special status plant species to a less than significant level through avoidance and transplantation and/or restoration when necessary.

Special Status Wildlife Species

Implementation of the Program would result in direct impacts to habitats occupied or suitable for special status wildlife species. These habitats include wetland and riparian habitats, open water/lake,

oak woodlands, various chaparral communities, Diegan coastal sage scrub and various subtypes of this habitat, coastal sage-chaparral scrub, and non-native grassland. Such impacts would be a result of maintenance activities such as vegetation removal, eucalyptus removal, and dredging conducted under the Program, which could cause loss of habitat and/or direct injury or mortality to individuals. These impacts are described below.

Federally or State Listed Animal Species

Implementation of the Program would impact locations where the following five listed animal species have been documented within the Program area or have high potential to occur: Quino checkerspot butterfly (QCB), Hermes copper butterfly, Arroyo toad (ARTO), coastal California gnatcatcher (CAGN), and least Bell's vireo (LBVI).

Quino Checkerspot Butterfly

Implementation of the Program would result in impacts to QCB from the removal of 0.76 acre of potentially occupied QCB habitat (including 0.03 acre of host plants) at Savage Dam and 3.80 acres of potentially occupied QCB habitat (including 0.28 acre of host plants) at Dulzura Conduit. These impacts are considered significant and require mitigation. Indirect impacts to QCB could also occur through surface disturbance to occupied host plant patches during maintenance activities.

Seven QCB individuals (spread across three locations) were observed in the Savage Dam study area approximately 430 feet east of the proposed maintenance footprint. The following maintenance activities at Savage Dam would impact would result in impacts to approximately 0.76 acre of potentially occupied QCB habitat containing 0.03 acre of host plants at Savage Dam: clearing of vegetation within 10 feet, and removal of eucalyptus trees within 50 feet (if the understory below the eucalyptus is disturbed), of Savage Dam and appurtenant structures, and maintenance of access roads, trails, and footpaths.

QCB individuals at Dulzura Conduit were observed along dirt roads adjacent to the conduit, along a Program access road (Trail 4), and perched within the conduit. The following maintenance activities associated with the Dulzura Conduit would result in impacts to approximately 3.80 acres of potentially occupied QCB habitat containing 0.28 acre of host plants within the Dulzura Conduit study area: clearing of vegetation within 5 feet of the conduit and maintenance of access roads, trails, and footpaths.

Implementation of the Program would also result in impacts to 0.9 acre of designated critical habitat that contains the physical or biological features essential for QCB.

Potential Program impacts to QCB and QCB occupied habitat would be reduced to a less than significant level through implementation of mitigation measure **BIO-4** which includes avoidance measures, habitat-based mitigation, and consultation with the USFWS.

Hermes Copper Butterfly

Potentially suitable habitat for Hermes copper is present within the Program area at Barrett Dam and Dulzura Conduit where the species' larval host plant, spiny redberry, was observed in close

proximity to California buckwheat, the species' preferred nectaring resource. The species has a high potential to occur within the maintenance footprint at these locations based on the presence of core and non-core occurrences areas along the northern portion of the Barrett Dam access road and surrounding area. Impacts to occupied Hermes copper butterfly habitat and Hermes copper butterfly, if found to occur, would be considered significant and require mitigation.

USFWS-designated critical habitat for the species occurs along the northern portion of the Barrett Dam access road. Maintenance activities proposed along the Barrett Dam north access road would be limited to the existing road right-of-way, which is developed and does not contain physical or biological features that are essential for the species. Therefore, at these locations, implementation of the Program would not result in direct impacts to USFWS-designated critical habitat with the potential to support the species.

Potential Program impacts to Hermes copper butterfly and habitat occupied by the species would be reduced to a less than significant level through implementation of mitigation measure **BIO-5** which includes avoidance measures, habitat-based mitigation, and consultation with the USFWS.

Arroyo Toad

Implementation of the Program is not anticipated to result in direct impacts to ARTO as the majority of the Program area is located outside of the known distribution of ARTO and does not contain suitable riparian habitat, sandy soils, and adjacent upland terraces required by the species. Furthermore, the Program is restricted to the long-term maintenance of existing dams which by design disrupt the hydrological regime of the existing creeks and rivers that have been impounded and alter existing habitats and soils so that they are less conducive to ARTO use and occupation. However, ARTO was observed at one dam location (Sutherland Dam) and has the potential to occur at three other facilities (Barrett Dam, El Capitan Dam, and Dulzura Conduit). Potential Program impacts to ARTO at these facilities are presented below.

A single transient ARTO was observed at Sutherland Dam on the rock-lined portion of the dam spillway. Maintenance activities that would occur at Sutherland Dam include the clearing of vegetation within 10 feet of the dam and appurtenant structures, spillway maintenance and repair, and maintenance of access roads, trails, and footpaths. These activities would not result direct impacts to arroyo toad breeding habitat as no riparian habitat along Santa Ysabel Creek would be impacted, and no suitable breeding habitat was found to occur at Sutherland Dam. The habitat within the Sutherland Dam maintenance areas consists of the concrete dam, concrete and bedrock associated with the spillway, and small areas of non-native grassland and coastal sage scrub within vegetation clearing areas, which were characterized as low quality for ARTO and unsuitable for breeding. These areas lack sandy substrates and shallow pools that are required to support breeding toads. The non-native grassland and coastal sage scrub within the maintenance areas are not considered suitable upland arroyo toad habitat because these areas occur immediately surrounding the developed footprint of the dam and lack sandy soils suitable for burrowing. Though maintenance activities would not result in direct impacts to breeding ARTO habitat, there is potential for ARTO to be present within the proposed maintenance footprint during maintenance activities, as one toad was observed during project surveys. Direct impacts to ARTO, if toads were harmed, would be considered significant and require mitigation.

Though ARTO was not detected at Barrett Dam or El Capitan Dam, USFWS-designated critical habitat for the species and potentially suitable riparian and upland habitats occur at both facilities, and there is potential for toads to be present in these areas during maintenance activities. Impacts to suitable ARTO habitat and direct impacts to ARTO, if toads were harmed, would be considered and require mitigation.

USFWS-designated critical habitat for ARTO also occurs within the Dulzura Conduit study area. However, these areas occur within upland areas situated outside of Cottonwood Creek and do not contain suitable breeding habitat. The conduit itself is located between 600- and 2,700-feet upslope of mapped critical habitat areas and is separated from ARTO breeding habitat by a steep hillside that would preclude ARTO access for foraging or aestivating. Furthermore, ARTO found along Cottonwood Creek are unlikely to cross Barrett Lakes Road to reach these upland areas. As such, maintenance activities along Dulzura Conduit and associated access roads would not result in direct impacts to the species.

Implementation of the Program would result in impacts to USFWS-designated critical habitat for the species as follows: 0.3 acre at Barrett Dam (comprised of 0.04 acre of non-vegetated channel, 0.2 acre of southern riparian forest, and 0.07 acre of granitic southern mixed chaparral); 0.7 acre at Dulzura conduit (comprised of 0.1 acre of granitic southern mixed chaparral, 0.05 acre of Diegan coastal sage scrub, 0.2 acre of disturbed habitat, and 0.4 acre of developed land); and 4.76 acres at El Capitan Dam (comprised of 0.73 acre of southern riparian forest, 0.01 acre of coastal live oak woodland, 0.65 acre of Diegan coastal sage scrub, 0.47 acre of non-native grassland, 0.04 acre of eucalyptus woodland, 0.03 acre of non-native vegetation, 0.11 acre of disturbed habitat, and 2.72 acres of developed land).

Potential Program impacts to arroyo toad, potentially suitable ARTO habitat, and critical habitat for the species would be reduced to a less than significant level through implementation of mitigation measure **BIO-6** which includes avoidance measures, habitat-based mitigation, and consultation with the USFWS.

Coastal California Gnatcatcher

Implementation of the Program would result in impacts to CAGN from the removal of 7.9 acres of Diegan coastal sage scrub and 1.2 acres of coastal sage-chaparral scrub within the Program area. Impacts to occupied and potential CAGN habitat within the Program area are considered significant and would require mitigation. If construction activities were to occur during the gnatcatcher breeding season (March 1 through August 15) and impact occupied CAGN habitat, direct impacts to nesting CAGN would be considered significant and would require mitigation. Additionally, indirect impacts to CAGN would occur if construction activities were to take place during the gnatcatcher breeding season and were to generate noise greater than 60 A-weighted decibels (dBA), or exceed ambient noise levels if greater than 60 dBA, within occupied CAGN habitat within the MHPA.

Implementation of the Program would also result in impacts to 3.65 acres of USFWS-designated critical habitat for CAGN at El Capitan Dam. These impacts would be comprised of 0.62 acre of Diegan coastal sage scrub (including disturbed), 0.02 acre of southern mixed chaparral, 0.14 acre of non-native grassland, 0.73 acre of southern riparian forest, 0.04 acre of coast live oak woodland, 0.04 acre of eucalyptus woodland, 0.56 acre of non-native vegetation, 0.08 acre of disturbed habitat,

and 1.42 acres of developed land. However, it should be noted that only Diegan coastal sage scrub, southern mixed chaparral, non-native grassland, and southern riparian forest contain the physical or biological features that are essential for the species, as defined by the USFWS. Therefore, the Program would only impact 1.51 acres of designated critical habitat that contains the physical or biological features that are essential for CAGN.

Program impacts to CAGN and suitable CAGN habitat would be reduced to a less than significant level through implementation of mitigation measure **BIO-7** which includes habitat-based mitigation and avoidance measures to ensure maintenance activities do not disturb CAGN during the breeding season.

Least Bell's Vireo

Implementation of the Program would result in impacts to LBVI from the removal of 1.49 acres of southern riparian forest, 0.08 acre of riparian woodland, and 0.27 acre of southern willow scrub within the Program area. Impacts to occupied and potential LBVI habitat within the Program area are considered significant and would require mitigation. If construction activities were to occur during the vireo breeding season (March 15 through September 15) and impact occupied LBVI habitat, direct impacts to nesting LBVI would be considered significant and would require mitigation. Additionally, indirect impacts to LBVI would occur if construction activities were to take place during the LBVI breeding season and were to generate noise levels greater than 60 dBA, or exceed ambient noise levels if greater than 60 dBA, within occupied LBVI habitat.

Program impacts to LBVI and suitable LBVI habitat would be reduced to a less than significant level through implementation of mitigation measure **BIO-8** which includes habitat-based mitigation and avoidance measures to ensure maintenance activities do not disturb CAGN during the breeding season.

Other Special Status Animal Species

Maintenance activities associated with the proposed Program would be located in areas where 23 special status animal species have been documented to occur and in areas where 27 special status animal species have high potential to occur. Impacts to these species, however, would be less than significant due to the small number of individuals that would potentially be affected, the relatively small amount of habitat to be impacted at each facility, and the large amount of suitable habitat in the Program area that would be avoided by activities and would continue to be preserved within the MHPA and other adjacent conserved lands.

Implementation of the Program would result in the removal of habitats occupied by 14 MSCP-covered species; however, impacts would be less than significant based on adequate species coverage and suitable habitats protected under the MSCP within the MHPA.

Significant impacts to nesting birds, including raptors, could occur if maintenance activities occurring during the breeding season were to directly impact nesting individuals. In order to ensure adequate protection of nesting birds and raptors, Program activities resulting in clearing of vegetation during the breeding shall be conducted in accordance with federal and state nesting bird regulations. Additionally, mitigation measure **BIO-9** would reduce potential impacts to any nesting bird species

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

identified as a listed, candidate, sensitive, or special status species in the City's MSCP subarea plan to a less than significant level through implementation of appropriate avoidance measures and nest setbacks as determined in the City's Biology Guidelines.

Potential bat roosting habitat occurs within the Program area including facilities that would be maintained under the proposed Program, such as the concrete dams. Direct impacts to special status bat species may be considered significant and require mitigation depending on the species, sensitivity, and number of individuals that would be impacted. Mitigation measure **BIO-10** would reduce these impacts to a less than significant level through implementation of appropriate avoidance measures.

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

Implementation of the overall Program would result in direct impacts to riparian habitat and sensitive natural communities. Program impacts include permanent impacts to 10.90 acres of wetlands and non-wetland resources, and 19.9 acres of Tier I, II, IIIA, and IIIB sensitive uplands as summarized in the Table 2, *Summary of Program Impacts and Mitigation – Wetland Habitat*), and Table 3, *Summary of Program Impacts and Mitigation – Sensitive Uplands*, below. Impacts to wetland habitat (with the exception of arundo-dominated riparian) and sensitive uplands would be considered significant and would require mitigation at ratios prescribed by the City's Biology Guidelines (2018). Impacts to arundo-dominated riparian habitat would be limited to the removal of a monotypic stand of giant reed at the Dulzura Conduit and would not involve grading or other alteration of wetlands; therefore, the impact is considered to be less than significant and would not require mitigation.

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

Table 2
Summary of Program Impacts and Mitigation – Wetland Habitat

Vegetation/Land Cover	Anticipated Program Impacts (acres)[1]			Mitigation Ratio[2]	Anticipated Mitigation Requirements (acres)[1]		
	Inside MHPA	Outside MHPA	Total		Creation/ Restoration[3]	Creation/ Restoration/ Enhancement/ Preservation/ Credits[4]	Total
Southern Riparian Forest	0.49	1.00	**1.49**	3:1	1.49	2.98	4.47
Southern Coast Live Oak Riparian Forest	0	0	**0**		0	0	0
Riparian Woodland	0.03	0.05	**0.08**		0.08	0.16	0.24
Mule Fat Scrub	0	0	**0**	2:1	0	0	0
Southern Willow Scrub	0.27	0	**0.27**		0.27	0.27	0.54
Arrowweed Scrub	0	0	**0**		0	0	0
Tamarisk Scrub	0	0	**0**		0	0	0
Freshwater Marsh	0.78	0.27	**1.05**		1.05	1.05	2.10
Disturbed Wetland	0	0.02	**0.02**		0.02	0.02	0.04
Non-native Riparian	0.06	0	**0.06**		0.06	0.06	0.12
Unvegetated Habitat/Lakeshore Fringe	0	0.49	**0.49**		0.49	0.49	0.98
Non-vegetated Channel	0	0.06	**0.06**		0.06	0.06	0.12
Arundo-Dominated Riparian	0	0.02	**0.02**	0:1	0	0	0
Open Water/Freshwater Lake	3.24	4.12	**7.36**[5]		0	0	0
TOTAL	**4.87**	**6.03**	**10.90**	**-**	**3.52**	**5.09**	**8.61**

[1] Acreages rounded to the nearest 0.01 acre for wetlands; total reflects rounding.
[2] Wetland mitigation ratios are in accordance with Table 2A of the City's Biology Guidelines (2018).
[3] Mitigation for wetland impacts shall include a minimum 1:1 creation (establishment) or restoration (re-establishment) component to ensure no net loss of wetlands.
[4] Mitigation shall be achieved through one or a combination of the following: habitat creation, restoration, and/or enhancement; acquisition and preservation of specific land; purchase of mitigation credits at an approved mitigation bank; and/or allocation of available mitigation credits at an existing PUD mitigation site(s).
[5] Program impacts to open water/freshwater lake are restricted to dredging activities around the outlet towers, low-level outlets, and intake pipes, and routine clearing of debris. No habitat modification of open water/freshwater lake would occur.

Table 3
Summary of Program Impacts and Mitigation – Sensitive Uplands

Vegetation/Land Cover	Anticipated Program Impacts (acres)[1]			Mitigation Ratio[2]	Anticipated Mitigation Requirements[3] (acres)[1]
	Inside MHPA	Outside MHPA	Total		
Tier I					
Native Grassland – Disturbed	0	0	**0**	2:1; 1:1	0
Coast Live Oak Woodland	0	0.1	**0.1**		0.1
Engelmann Oak Woodland	0	0	**0**		0
Mixed Oak Woodland	0	0	**0**		0
Scrub Oak Chaparral	0	0.1	**0.1**		0.1
Tier I Total	***0***	***0.2***	***0.2***	**-**	***0.2***
Tier II					
Diegan Coastal Sage Scrub – including Disturbed, Sparse, Laurel Sumac Dominated, and Baccharis Dominated	2.6	5.3	**7.9**	1:1	7.9
Flat-topped Buckwheat Scrub	0	0	**0**		0
Coastal Sage-Chaparral Scrub – including disturbed	0	1.2	**1.2**		1.2
Tier II Total	***2.6***	***6.5***	***9.1***	**-**	***9.1***
Tier IIIA					
Southern Mixed Chaparral – including Ceanothus Dominated	0.1	0	**0.1**	1:1†; 0.5:1‡	0.1
Granitic Southern Mixed Chaparral – including disturbed	0	3.1	**3.1**		1.6
Granitic Northern Mixed Chaparral – including Sparse	0	0.4	**0.4**		0.2
Chamise Chaparral (37200)	0	0.2	**0.2**		0.1
Tier IIIA Total	***0.1***	***3.7***	***3.8***	-	***2.0***
Tier IIIB					
Non-native Grassland (42200)	2.5	4.3	**6.8**	1:1†; 0.5:1‡	4.7
Tier IIIB Total	***2.5***	***4.3***	***6.8***	-	***4.7***
TOTAL	**5.2**	**14.7**	**19.9**	-	**16.0**

[1] Acreages rounded to the nearest 0.1 acre for uplands; total reflects rounding. "

[2] Upland mitigation ratios in accordance with Table 3 of the City's Biology Guidelines (2018) and assume mitigation will occur within MHPA boundaries.

[3] Mitigation shall be achieved through one or a combination of the following: habitat creation, restoration, and/or enhancement; acquisition and preservation of specific land; purchase of mitigation credits at an approved mitigation bank; and/or allocation of available mitigation credits at an existing PUD mitigation site(s); and/or through payment into the City's Habitat Acquisition Fund.

† A 1:1 mitigation ratio is for Tier IIIA/Tier IIIB impacts inside the MHPA and mitigated inside the MHPA.

‡ A 0.5:1 mitigation ratio is for Tier IIIA/Tier IIIB impacts outside the MHPA and mitigated inside the MHPA.

Maintenance activities would occur over an extended period; therefore, the overall Program impacts would not occur all at once. Impacts presented above account for all the Program's known and potential impacts within the defined maintenance footprint, and there are currently no additional impacts anticipated to occur. If any future maintenance or repair activity were required to occur

outside of the defined maintenance footprint, a project-level analysis would be submitted to DSD for an SCR process to determine if the planned maintenance activity deviating from the maintenance footprint is consistent with the SDP and applicable mitigation measures and conditions included in that permit. Impacts to vegetation would occur as part of the following maintenance activities: dredging; clearing of vegetation within 10 feet of the dams, spillways, and appurtenant structures and five feet of Dulzura conduit; and removal of eucalyptus and palm trees. Impacts to riparian habitat and sensitive uplands would be considered significant and would require mitigation. Mitigation measures **BIO-1** and **BIO-2** would reduce these impacts to less than significant level through implementation of habitat-based at ratios prescribed by the City's Biology Guidelines.

The following activities are not anticipated to result in impacts to vegetation: maintenance and repair of the dams, spillways, Dulzura Conduit, and appurtenant structures; maintenance and repairs to outlet towers and trash racks; slope maintenance; access road maintenance; and geotechnical investigations. Maintenance and repair of the dams, spillways, Dulzura Conduit, and appurtenant structures would occur within the existing developed footprint of the structure. Work areas associated with these activities would be limited to developed and disturbed areas and accessed using existing access roads, trails, and footpaths. Any equipment required to complete the activities would be staged within developed and disturbed areas, including on the structure itself.

Maintenance and repair of the outlet towers and trash racks would also be limited to the currently developed footprints of the structures, which would be accessed using existing access roads, trails, and footpaths. Temporary staging of equipment and materials storage would be limited to existing developed and disturbed areas.

Slope maintenance activities involve the maintenance of vegetation on slopes surrounding Black Mountain Dam and Rancho Bernardo Dam. Existing shrubs and herbaceous vegetation within these areas would be maintained in the current condition, but trees would not be allowed to establish on the slopes. Any existing trees, or saplings that may attempt to establish, would be removed through cut and treat methods. No other vegetation would be removed during slope maintenance and tree removal activities.

Access road maintenance would be restricted to the existing road right-of-way and would involve minor repairs, improvements, and resurfacing, as needed. No expansion or temporary widening of the access road or trails is proposed under the Program. As such, vegetation would not be removed during access road maintenance activities. Minor trimming of vegetation along existing access roads, trails, and paths may occur as part of access road maintenance activities to prevent deterioration and keep critical access features in a useable condition. However, trimming activities would be limited to overhanging branches and individual limbs and would not result in ground disturbance or the removal of sensitive vegetation.

Geotechnical investigations, including conditions assessments, would occur within existing developed and disturbed areas, primarily on the structures themselves. Geotechnical activities would avoid any adjacent native vegetation areas. Collection of silt samples and other data in areas surrounding the dams, outlet towers, and other structures would be completed from a barge launched at the nearby boat ramp. No sensitive vegetation would be removed during geotechnical investigations, including condition assessments.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Have a substantial adverse effect on federally protected wetlands (including but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐

Implementation of the Program would result in direct impacts to wetland and non-wetland waters, streambed, and riparian habitat, potentially subject to USACE jurisdiction pursuant to Section 404 of the Clean Water Act (CWA; 33 USC 1344RWQCB jurisdiction pursuant to Section 401 of the CWA and State Porter-Cologne Water Quality Control Act, and streambed and riparian habitat potentially subject to CDFW jurisdiction pursuant to Sections 1600 et seq. of the California Fish and Game Code (CFG Code). Impacts would occur as a result of the following maintenance activities: dredging; clearing of vegetation within 10 feet of the dams, and appurtenant infrastructure and five feet of Dulzura conduit; and maintenance (removal of vegetation, sediment, and debris) of leakage, seepage, and other discharges paths. Repeatable temporary impacts to jurisdictional wetland and non-wetland waters and streambed areas would also occur due to dredging activities around the outlet towers and low-level outlet tunnels. Impacts to the wetland and non-wetland waters may require the issuance of a CWA Section 404 permit from the USACE, a CWA Section 401 Water Quality Certification or State Porter-Cologne Water Quality Control Act Waste Discharge Requirements (WDRs) from the RWQCB, and/or a Streambed Alteration Agreement from CDFW. Only the USACE, RWQCB, and CDFW can make a final determination of jurisdictional boundaries. The proposed Program will be required to obtain permits for work within US and state jurisdictional wetlands and non-wetland waters from all required wetland permitting agencies prior to implementation of maintenance activities that would result in impacts to jurisdictional resources. Impacts to wetlands, including riparian habitat, would be reduced less than significant with the incorporation of mitigation measure **BIO-1**.

The following activities are not anticipated to result in impacts to jurisdictional areas: maintenance and repair of the dams, spillways, Dulzura Conduit, and appurtenant structures; maintenance and repairs to outlet towers and trash racks; slope maintenance; access road maintenance; and geotechnical investigations. Maintenance and repair of the dams, spillways, Dulzura Conduit, and appurtenant structures would occur within the existing developed footprint of the structure. Work areas associated with these activities would be limited to developed and disturbed areas and accessed using existing access roads, trails, and footpaths. Any equipment required to complete the activities would be staged within developed and disturbed areas, outside of jurisdictional waters and wetlands, including on the structure itself.

Maintenance and repair of the outlet towers and trash racks would also be limited to the currently developed footprints of the structures, which would be accessed using existing access roads, trails, and footpaths. Temporary staging of equipment and materials storage would be limited to existing developed and disturbed areas, outside of jurisdictional waters and wetlands.

Slope maintenance activities involve the maintenance of vegetation on slopes surrounding Black Mountain Dam and Rancho Bernardo Dam. Existing shrubs and herbaceous vegetation would be maintained in the current condition, but tree species would not be allowed to establish on the slopes. Tree species that may attempt to establish would be removed through cut and treat

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

methods. No other vegetation would be removed during slope maintenance and tree removal activities, and no impacts would occur to jurisdictional waters and wetlands as none were found to occur within these areas.

Access road maintenance would be restricted to the existing road right-of-way and would involve minor repairs, improvements, and resurfacing, as needed. No expansion or temporary widening of the access road or trails is proposed under the Program. As such, vegetation, including jurisdictional wetland and riparian habitats, would not be removed during access road maintenance activities. Existing drainage crossings would be maintained in their current condition; no improvements or other alterations, such as the construction of Arizona crossings, would occur at existing drainage crossings. Minor trimming of vegetation along existing access roads, trails, and paths may occur as part of access road maintenance activities to prevent deterioration and keep critical access features in a usable condition. However, trimming activities would be limited to overhanging branches and individual limbs and would not result in ground disturbance or the removal of jurisdictional wetlands and riparian habitat.

Geotechnical investigations, including conditions assessments, would occur within the existing developed and disturbed areas, primarily on the structures themselves. Geotechnical activities would avoid any adjacent native vegetation areas. Collection of silt samples and other data in areas surrounding the dams, outlet towers, and other structures would be completed from a barge launched at the nearby boat ramp. No jurisdictional wetlands or riparian habitat would be removed during geotechnical investigations, including condition assessments, and no impacts to jurisdictional waters would occur.

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?	☐	☐	☒	☐

Regionally identified wildlife corridors and habitat linkages occur within the Program area. However, the proposed Program is limited to the long-term, routine maintenance of existing facilities and would not result in the construction or expansion of new facilities and would not result in the introduction of new land uses within the MHPA and biological core linkage areas. As such, implementation of the Program would not create any barriers to wildlife movement nor substantially alter current baseline conditions for local wildlife movement Program area. Similarly, the Program would not introduce new land uses or facilities that would impede the use of wildlife nursery sites. No impact would occur to wildlife corridors or linkages, or to wildlife nursery sites.

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

The proposed Program is consistent with the City's Biology Guidelines and Environmental Sensitive Land Regulations; no conflict with local policies or ordinances protecting biological resources would occur. Impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

In the context of the City's MSCP subarea plan, Black Mountain Dam, Chollas Dam, Hodges Dam, Miramar Dam, Murray Dam, San Vicente Dam, Savage Dam, and Upper Otay Dam occur within the MHPA. Though Barrett Dam, El Capitan Dam, Morena Dam, Sutherland Dam, and Dulzura Conduit are located outside of the boundaries of the City's MSCP subarea plan, the dams and associated infrastructure are owned and operated by the City, and as such, will comply with the policies and guidelines of the City's MSCP subarea plan. As detailed in Section 6.0 of the Program's BTR (Appendix B), the proposed Program is conditionally compatible with the biological objectives of the City's MSCP Subarea Plan and conforms with all applicable management directives, policies, and guidelines, including the MHPA Land Use Agency Guidelines, which ensures adverse effects to the MHPA do not result with project implementation. Impacts would be less than significant.

V. CULTURAL RESOURCES – Would the project:				
a) Cause a substantial adverse change in the significance of an historical resource as defined in §15064.5?	☐	☐		x

The purpose and intent of the Historical Resources Regulations of the Land Development Code (Chapter 14, Division 3, and Article 2) is to protect, preserve and, where damaged, restore the historical resources of San Diego. The regulations apply to all proposed development within the City of San Diego when historical resources are present on the premises. Before approving discretionary projects, CEQA requires the Lead Agency to identify and examine the significant adverse environmental effects 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.

The cultural resources study identified a total of 46 cultural resources within the Program's Area of Potential Effect (APE). Of these, 11 are associated with the City of San Diego Source Water System (CSDSWS), e.g., associated with the dams, reservoirs, and associated infrastructure. The significance status, project impacts, and recommendations for the CSDSWS-associated resources are discussed in the *City of San Diego Source Water System Historical Resources Assessment* (HELIX 2022d; Appendix C) that has been prepared for the Program. The historical resources assessment concludes that the project does not include any significant alterations, demolitions, relocations, or replacements of the complexes or individual resources within the CSDSWS considered to be historical resources and that given the limited scale of the maintenance activities compared with the expansive, multi-property resources comprising the CSDSWS discontiguous district and the individual reservoir complex historic districts, project implementation would not be expected to result in significant adverse impacts, and therefore, material impairment to historical resources.

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

The remainder of the 35 cultural resources situated within the APE are mostly unevaluated for listing on the California Register of Historical Resources (CRHR) and National Register of Historic Places (NRHP). Potential project effects to these 35 cultural resources identified within the APE and management recommendations are provided in Table 38 of the Program's Cultural Resources Report (HELIX 2022c; Appendix D). The resource locations in relation to the APE and the proposed maintenance are shown in Figures 4 through 14 of that report. The maintenance areas for the Program include those areas where dredging, vegetation clearing, slope maintenance, and eucalyptus/palm removal activities have been specifically delineated to occur.

The 35 cultural resources that are not associated with the CSDSWS , are being considered historical resources for the purposes of the Program, except for the resources determined to be destroyed or those that do not possess the characteristics necessary to be considered resources eligible for listing on the CRHR or NRHP, such as isolates. Of these resources, four are located within the Program's maintenance areas. Three would be in areas requiring vegetation removal, and there would be no effect to the resources as the vegetation clearing activities would not include ground disturbance. Another was determined to have been destroyed and would not be affected by Program activities. Additionally, five of the resources would be located within the Program's designated Environmentally Sensitive Areas (ESAs), which would preclude Program activities except for vegetation removal that does not involve ground disturbance.

None of the cultural resources would be impacted by Program maintenance activities, and impacts would not occur.

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

Of the 35 cultural resources identified, 21 of them are prehistoric archaeological resources. Of these resources, 12 are located within the Program's maintenance areas. Two are in locations that are likely to have been previously destroyed and would not be affected by Program activities. Another would not be eligible for listing in the CRHR or NRHP. The remaining archaeological resources would be located within the Program's designated Environmentally Sensitive Areas (ESAs), which would preclude Program activities except for vegetation removal that does not involve ground disturbance.

None of the identified archaeological resources would be impacted by Program maintenance activities, and impacts would not occur.

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

In the event that human remains are discovered, the County Coroner shall be contacted. If the remains are determined to be of Native American origin, the Most Likely Descendant, as identified by the Native American Heritage Commission, shall be contacted in order to determine proper treatment and disposition of the remains. All requirements of Health & Safety Code §7050.5 and PRC §5097.98 shall be followed. Impacts would not occur.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. ENERGY – Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☐	☒

The proposed Program includes routine maintenance of existing dams and associated infrastructure at various locations throughout San Diego County. Energy used for maintenance activities would primarily consist of fuels in the form of diesel and gasoline for the operation of mechanical equipment and worker vehicles. While maintenance activities would consume petroleum-based fuels, consumption of such resources would be temporary and would cease upon the completion of the temporary maintenance and report work. The petroleum consumed during these activities would be typical of similar construction projects and would not require the use of new petroleum resources beyond what are typically consumed in California. Based on these considerations, construction of the Program would not result in wasteful, inefficient, or unnecessary consumption of energy resources.

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

The proposed Program would be built and operated in accordance with existing, applicable regulations. Construction equipment would be maintained to allow for continuous energy-efficient operations. Furthermore, the Program would not result in an increase in energy use. Accordingly, the Program would not conflict with state or local plans related to energy, and no impacts would occur.

VII. GEOLOGY AND SOILS – Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
iv) Landslides?	☐	☐	☒	☐

The Program area, like the rest of southern California, is located within a seismically active region. Active faults in San Diego County include segments of the San Jacinto, Elsinore, and Rose Canyon fault zones. While there are faults in the vicinity of proposed maintenance areas, the proposed Program does not include the development of any structures that would pose a threat during an earthquake event. Although some activities may require the use of mechanical equipment and minor earthwork activities, maintenance activities do not have the potential to severely damage the environment or cause major loss of life. Similarly, the proposed Program would not require the construction of structures that would be susceptible to liquefaction, landslides, fault rupture, or unstable soils. Furthermore, the proposed Program would provide maintenance and repair of the dams and appurtenant structures to prevent deterioration that could lead to future dam failure. Conformance with standard engineering practices and design criteria for repair work would reduce the effects of seismic ground shaking. Therefore, impacts related to the exposure of seismic-related hazards would be less than significant.

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

Earthwork during maintenance activities such as grading, dredging, and vegetation removal would displace soils and temporarily increase the potential for soils to be subject to wind and water erosion. Program activities involve operations and maintenance, and the Program would require standard construction Best Management Practices (BMPs) to ensure that the project would not result in a substantial amount of topsoil erosion. Through implementation of standard sediment control and erosion control measure BMPs, impacts from soil erosion and topsoil loss would be less than significant.

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

Refer to Item VII.a above, regarding soil instability related to seismic effects. No water extractions or similar practices that are typically associated with subsidence effects are proposed. Adherence to standard engineering practices would result in less than significant impacts related to subsidence of the land.

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

Certain types of clay soils expand when they are saturated and shrink when dried. These are called expansive soils and can pose a threat to the integrity of structures built on them without proper engineering. Due to Program maintenance being located throughout the County, individual activities may be located on expansive soils. The proposed Program would not involve the construction of buildings or structures. No impacts associated with expansive soils would occur.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒

The proposed Program would not require the need for the disposal of wastewater. Implementation of the Program would not require the construction of structures or buildings or wastewater disposal systems. No impacts would occur.

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

Impacts to paleontological resources generally occur from the physical destruction of fossil remains by excavation operations that cut into geologic formations. When such activities occur, potential impacts are limited to the immediate area of disturbance. Because paleontological resources are typically located underground and, therefore, not apparent until revealed by excavation, the potential for significant impacts to paleontological resources is based on the extent that a geologic formation would be disturbed and the potential for those geologic formations to contain fossils. The proposed Program's maintenance activities would occur at various locations throughout San Diego County, potentially including areas with high paleontological resource sensitivity. However, the proposed Program does not propose the construction of structures such as buildings or major earthworks. Dredging and grading activities are not anticipated to require earth-moving activities that would disturb the substratum or parent material below major soil horizons.

The City's Municipal Code defines the thresholds for paleontological resource monitoring in the General Grading Guidelines in the Land Development Manual. Monitoring is required for any of the following:

- 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; or
- Grading that involves 2,000 cubic yards or greater, and 10 feet or greater in depth, in Moderate Resource Potential Geologic Deposit/Formation/Rock Unit; or
- Grading on a fossil recovery site or within 100 feet of the mapped location of a fossil recovery site.

The proposed Program does not include maintenance activities that would exceed these thresholds. Therefore, impacts to paleontological resources would be less than significant.

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?	☐	☐	☒	☐

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

Global climate change refers to changes in average climatic conditions on Earth as a whole, including temperature, wind patterns, precipitation, and storms. Global temperatures are moderated by naturally occurring atmospheric gases, including water vapor, carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), ozone, and certain hydro-fluorocarbons. These gases, known as greenhouse gases (GHGs), allow solar radiation (sunlight) into the Earth's atmosphere, but prevent radiative heat from escaping, thus warming the Earth's atmosphere. Greenhouse gases are emitted by both natural processes and human activities. The accumulation of GHGs in the atmosphere regulates the Earth's temperature. Emissions of GHGs in excess of natural ambient concentrations are thought to be responsible for the enhancement of the greenhouse effect and contributing to what is termed "global warming," the trend of warming of the Earth's climate from anthropogenic activities. Global climate change impacts are by nature cumulative; direct impacts cannot be evaluated because the impacts themselves are global rather than localized impacts.

California Health and Safety Code Section 38505(g) defines GHGs to include the following compounds: CO_2, CH_4, N_2O, ozone, chlorofluorocarbons, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. As individual GHGs have varying heat-trapping properties and atmospheric lifetimes, GHG emissions are converted to carbon dioxide equivalent (CO_2e) units for comparison. The CO_2e is a consistent methodology for comparing GHG emissions because it normalizes various GHG emissions to a consistent measure.[1] The most common GHGs related to the project are those primarily related to energy usage: CO_2, CH_4, and N_2O.

Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006, set the state-wide goal to reduce GHG emissions to 1990 levels by 2020. Senate Bill (SB) 32 was passed as a follow up to AB 32 and extended the reduction target to 40 percent below 1990 levels by 2030.

A Climate Action Plan (CAP) was adopted by the City Council in December 2015. The CAP quantifies existing GHG emissions as well as projected emissions for the years 2030 and 2035 resulting from activities within the City's jurisdiction. The CAP also identifies City target emissions levels, below which the Citywide GHG impacts would be less than significant. The CAP Plan and the accompanying certified Final Environmental Impact Report also identify and analyze the GHG emissions that would result from the business-as-usual scenario for the years 2030 and 2035. The CAP includes a monitoring and reporting program to ensure its progress toward achieving the specified GHG emissions reductions and specifies actions that, if implemented, would achieve the specified GHG emissions reductions targets. In 2015, the CAP was adopted in a public process following certification of Final Environmental Impact Report SCH No. 2015021053 (City of San Diego 2015). Subsequent to the adoption of the CAP, the City also established additional specific measures (CAP Consistency Checklist) that, if implemented on a project-by-project basis, would further ensure that the City as a whole achieves the specified GHG emissions reduction targets in the Climate Action Plan.

[1] The effect each GHG has on climate change is measured as a combination of the volume of its emissions, and its global warming potential. The global warming potential is the potential of a gas or aerosol to trap heat in the atmosphere and is expressed as a function of how much warming would be caused by the same mass of CO_2. For instance, CH_4 has a global warming potential of 21, meaning that 1 gram of CH_4 traps the same amount of heat as 21 grams of CO_2. N_2O has a global warming potential of 310.

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

In July 2022, the City Council adopted an update to the CAP (2022 CAP), in a public process following certification of the Second Addendum to Final Environmental Impact Report SCH No. 2015021053. As proposed in the 2022 CAP, in October 2022, the City Council approved an amendment to the Land Development Code which incorporated a revised CAP consistency checklist CAP (Consistency Regulations) which replaced the CAP Consistency Checklist as the measures that could be implemented on a project-by-project basis pursuant to CEQA Guidelines Section 15183.5(b)(1)(D). Projects for new development that are consistent with the CAP, as determined through compliance with the CAP Consistency Regulations, may rely on the CAP for the cumulative impacts analysis of GHG emissions. For public infrastructures projects, the City has developed guidance for assessing CAP consistency. The environmental analysis for public infrastructure projects should include a discussion of overall consistency with each of the strategies of the 2022 CAP: Strategy 1: Decarbonization of the Built Environment; Strategy 2: Access to Clean and Renewable Energy; Strategy 3: Mobility and Land Use; Strategy 4: Circular Economy and Clean Communities; Strategy 5: Resilient Infrastructure and Healthy Ecosystems; and Strategy 6: Emerging Climate Action (City of San Diego 2022).

Pursuant to CEQA Guidelines sections 15183.5(b), 15064(h)(3), and 15130(d), the City may determine that a project's incremental contribution to a cumulative greenhouse gas (GHG) effect is not cumulatively considerable if the project complies with the requirements of a previously adopted GHG emission reduction plan. An environmental document that relies on a GHG emissions reduction plan for a cumulative impacts analysis must identify those requirements specified in the plan that apply to the project, and if those requirements are not otherwise binding and enforceable, incorporate those requirements as mitigation measures applicable to the project. As discussed above, the 2022 CAP is a qualified CAP pursuant to CEQA Guidelines sections 15183.5 and the City Planning Department has provided guidance for assessing CAP consistency for public infrastructure projects which requires a discussion of overall consistency with each of the strategies of the 2022 CAP. GHG emissions impacts for public infrastructure projects which are consistent with the CAP, determined by following the City Planning Department Guidance, would be less than significant (City of San Diego 2022).

The Air Quality and Greenhouse Gas Letter Report (HELIX 2022a; Appendix A) conducted modeling of Program GHG emissions using the California Emissions Estimator Model (CalEEMod), as shown below in Table 4, *Annual Operational Emissions*. The calculations included estimated emissions from maintenance activities and repair work. Other operational activities of the existing facilities would not result in new emissions and were not included in the modeling.

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

Table 4
ANNUAL OPERATIONAL EMISSIONS

Facility	CO_2[1]	CH_4[1]	N_2O[1]	CO_2e[1]
Barrett	0.9	<0.1	<0.1	0.9
Black Mountain	0.6	<0.1	<0.1	0.6
Chollas	1.3	<0.1	<0.1	1.3
El Capitan	1.7	<0.1	<0.1	1.7
Hodges	1.4	<0.1	<0.1	1.4
Miramar	1.7	<0.1	<0.1	1.7
Morena	1.7	<0.1	<0.1	1.7
Murray	1.7	<0.1	<0.1	1.7
Rancho Bernardo	0.2	<0.1	<0.1	0.2
San Vicente	1.7	<0.1	<0.1	1.7
Savage	1.7	<0.1	<0.1	1.7
Sutherland	1.7	<0.1	<0.1	1.7
Upper Otay	1.7	<0.1	<0.1	1.7
Dulzura Conduit	4.1	<0.1	<0.1	4.1
Total Annual Emissions	**22.0**	**<0.1**	**<0.1**	**22.0**

Source: HELIX 2022

[1] GHG Emissions (metric tons per year).

GHG = greenhouse gas; CO_2 = carbon dioxide; CH_4 = methane; N_2O = nitrous oxide; CO_2e = carbon dioxide equivalents

As discussed in VIII.b below, the Program would be consistent with the strategies in the City's 2022 CAP. Therefore, the implementation of the Program would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment, and the impact would be less than significant.

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

The proposed Program would provide ongoing maintenance to existing municipal facilities. The Program would not generate growth in population or employment or require the alteration of an existing land use designation through amendments to general plans or changes to zoning. Following from the City Planning Department for assessing 2022 CAP consistency for public infrastructure projects, overall consistency with each of the strategies of the 2022 CAP is provided below:

Strategy 1: Decarbonization of the Built Environment: The City has adopted a goal to achieve zero emissions municipal buildings and operations by 2035. The Program is maintenance to existing dams and associated infrastructure. This maintenance is required for ongoing operation of existing facilities with no expansion of use or modification of the facilities. The Program would implement Best Management Practices for construction activities as set forth in the Greenbook (for public projects) that further energy efficiency. The Greenbook, which is also known as the Standard Specifications for Public Works Construction, has a section on work site maintenance that includes measures for pollution control and equipment maintenance. Maintaining construction equipment in proper working condition according to manufacturer's specifications, as required by the Greenbook,

is one way to ensure energy efficiency. The Greenbook also includes construction operations measures that would limit pollution including air emissions. All City contract documents require that the contractor conform to the Greenbook and the City's supplement, the Whitebook. Additionally, California regulations limit construction equipment and vehicle idling by requiring that equipment be shut off when not in use and that idling not exceed five minutes [California Code of Regulations, Title 13, sections 2449(d)(3) and 2485]. Signs must be posted at entrances to work sites stating this requirement. The California Air Resources Board (CARB) enforces idling limitations and compliance with diesel fleet regulations. CARB also issues certificates of compliance for off-road diesel-powered equipment. Therefore, the Program would not conflict with the City's ability to implement the actions identified in the CAP related to decarbonization of the built environment, including City requirements for building electrification, distributed energy generation, and energy storage.

Strategy 2: Access to Clean and Renewable Energy: Strategy 2 transitions City wide energy use for the built environment and for transportation away from fossil fuels and toward clean and renewable sources. The Program would not include construction of new buildings, modifications to existing buildings, or any transportation system components. The Program is required maintenance of existing City-owned infrastructure. Maintenance of the City's dams and associated infrastructure supports continued use of existing local water supplies and will prevent mandated drawdowns of the reservoir level and level restrictions implemented by the State for safety that reduce local water storage and usage. Utilization of local water supplies like those stored at City dams reduces energy associated with importing water and contributes to the City's GHG reduction goals. Therefore, the Program would not conflict with the City's ability to implement the actions identified in the CAP related to clean and renewable energy.

Strategy 3: Mobility and Land Use: Strategy 3 involves prioritizing infrastructure project that support sustainable mode choices such as walking, bicycling and transit use, and developing strategic land use planning to reduce citywide vehicle emissions. The Program involves maintenance activities at existing facilities owned and managed by the PUD. No bicycle, pedestrian, or transit facilities would be impacted by the Program. Because the Program involves maintenance of existing City-owned infrastructure, there is no proposed change in land use or measures that would reduce vehicle miles traveled as there is no new development proposed as part of the Program. The Program is consistent with this CAP strategy and does not conflict with the City's ability to implement the actions related to mobility and land use.

Strategy 4: Circular Economy & Clean Communities: Strategy 4 is focused on reducing solid waste through recycling, composting, reduction, and reuse. The Program waste would include soils and vegetation removed from the City facilities which would be reused as fill or aggregate material on site for access roads or other operational needs or recycled for use at other PUD facilities. The Program would be required to submit and implement a waste management plan and dispose of any vegetation and debris that cannot be reused or recycled at the Miramar Landfill and Miramar Greenery consistent with the City's Construction and Demolition Debris Diversion Ordinance and the City's Whitebook Standards Specifications for Public Works Construction. The Program would not affect solid waste generation resulting from operation of any of the facilities. Therefore, the Program would not conflict with the City's ability to implement the actions identified in the CAP related to circular economy and clean communities.

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

Strategy 5: Resilient Infrastructure and Healthy Ecosystems: Strategy 5 relates to climate resiliency and includes the goal of increasing tree canopy coverage. The action under this goal includes consideration of a Citywide Urban Tree Planting Program, which would incorporate water conservation measures and prioritization of drought-tolerant and native trees and plantings in areas with recycled water. The Program does not conflict with the City's ability to implement the goals under this strategy. The Program would not result in the removal of any trees that are considered part of the urban tree canopy. Impacts to sensitive habitat, which could include the removal of trees, would be mitigated through the allocation of credits and a PUD approved site. Program mitigation furthers the City's climate resiliency goals by offsetting Program impacts to habitat at a higher ratio than what was impacted. Mitigation sites are maintained in preservation in perpetuity under agreements with various wildlife agencies and cannot be developed at a later point in time. Therefore, the Program would not conflict with the City's ability to implement the actions identified in the CAP related to resilient infrastructure and healthy ecosystems.

Strategy 6: Emerging Climate Action: This broad strategy looks to identify, support, and collaborate on research and programs for further reductions in GHG emissions. The Program is maintenance to existing dams an associated infrastructure. This maintenance is required for ongoing operation of existing facilities with no expansion of use or modification of the facilities. The Program would not conflict with the City's ability to implement the actions identified in the CAP related to emerging climate action.

As discussed above, the Program would not conflict with any the 2022 CAP's six GHG reduction strategies. Therefore, the Program would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs, including the City's Climate Action Plan (CAP), and the impact would be less than significant.

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?	☐	☐	☐	☒

Construction of the project may require the use of hazardous materials (fuels, lubricants, solvents, etc.), which would require proper storage, handling, use and disposal; however, the project would not routinely transport, use or dispose of hazardous materials. Therefore, the project would not create a significant hazard to the public or environment. No impact would result due to implementation of the Program.

b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐

The proposed Program maintenance activities are not anticipated to result in a release of hazardous materials into the environment. Construction of the project may require the use of hazardous materials (fuels, lubricants, solvents, etc.), which would require proper storage, handling, use and

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

disposal; however, the project would not routinely transport, use or dispose of hazardous materials. Therefore, no impact with respect to exposing the public or the environment to hazardous materials through upset and accident conditions would occur.

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

The following locations proposed for routine maintenance under the Program would be located within one-quarter mile of an existing school: Chollas Dam, Miramar Dam, Murray Dam, and Rancho Bernardo Reservoir. However, as discussed above, the Program would fully adhere to all applicable federal, state, and local regulations regarding the handling, storage, usage, and transportation of hazardous materials. Furthermore, the Program would only use herbicides that are USEPA/CalEPA registered and, as such, have been determined to be safe for environmental application as specified on the label. The proposed Program's maintenance activities would not result in significant hazardous impacts at existing or proposed schools. Impacts would be less than significant.

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

Pursuant to Government Code Section 65962.5 (Cortese List) requirements, the SWRCB GeoTracker database (SWRCB 2022) and the California Department of Toxic Substances Control (DTSC) EnviroStor database (DTSC 2022) were searched for hazardous materials sites within the proposed maintenance areas. The dams and reservoirs are not listed as hazardous materials sites on either of these databases, however some Program activities may be located within 1,000 feet of closed cleanup sites in the vicinity of Miramar Dam, Hodges Dam, Murray Dam, and Upper Otay Dam. The Program's maintenance activities would not affect these closed cleanup sites and there are no active or inactive cleanup sites mapped in the vicinity of the maintenance areas, including along the Dulzura Conduit. Therefore, no impact related to hazardous materials sites would occur.

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

The Program includes maintenance activities that would occur in a wide range of locations throughout San Diego County, including potentially within an airport land use plan or within two miles of a public airport or public use airport where such a plan has not been adopted. However, the proposed Program would not construct structures that would create a safety hazard or excessive noise for people residing or working in the Program area. Therefore, no impacts related to airport hazards would occur.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐

The proposed Program involves maintenance activities that could require the periodic use of vehicles and light trucks. While maintenance activities are not anticipated to result in any road or lane closures, should these be needed, the City would be required to prepare and comply with a traffic control plan which would include measures to minimize effects and ensure safe passage of evacuees or emergency response vehicles. Additionally, the proposed Program would use existing staging areas and would not introduce new structures or residents to the region that may result in slower emergency response or evacuation times. Therefore, impacts would be less than significant.

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

The proposed Program would not expose people or structures to a significant risk of wildland fires because the Program does not propose structures that would be at risk for fire damage or buildings meant for human occupancy. Maintenance activities involve the removal of vegetation along access roads and would include the removal of dead vegetation from the maintenance areas. This would reduce the amount of potential fuel and would not increase the risk of loss, injury, or death involving wildfires. Therefore, no impacts would occur.

X. HYDROLOGY AND WATER QUALITY - Would the project:

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

The proposed Program maintenance areas are under the jurisdiction RWQCB San Diego Region Basin Plan. Under Section 402 of the Clean Water Act, the RWQCB issues National Pollutant Discharge Elimination System (NPDES) permits to regulate discharges to “waters of the nation,” which include rivers, lakes, and their tributary waters. Potential impacts related to water quality could occur during grading, dredging, and vegetation removal when the potential for erosion, siltation, sedimentation, and accidental release of hazardous materials would be the greatest. These pollutants could degrade surface water quality if carried by stormwater or other runoff into surface waters. Sediment that is washed off site can result in turbidity in surface waters, which can impact aquatic species. Hydrocarbons such as fuels, oils, and hazardous materials discharged from equipment could also potentially impact aquatic plants and animals downstream if not protected.

The City shall obtain applicable permitting from federal and State regulatory agencies for Program activities that would result in impacts to federal or State regulated water bodies (i.e., Waters of the U.S. and State, streambeds, wetlands, and/or riparian habitat) prior to the commencement of discharge or dredging activities. Such agencies may include USACE, RWQCB, and CDFW.

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

Existing regulatory processes are in place for safeguarding surface water quality under the RWQCB's NPDES Construction General Permit Program. For disturbances greater than one acre, a SWPPP must be prepared that identifies BMPs to minimize ground disturbance, reduce erosion, and limit or prevent various pollutants from entering surface water runoff. For disturbances of less than one acre, the City's water quality BMPs, such as silt fencing, sediment traps, and straw bale barriers would be implemented to reduce the discharge of pollutants associated with smaller sites. As such, individual Program activities would adhere to these regulatory processes and would implement BMPs to reduce potential impacts on surface water quality. These would also include requiring any staging of equipment or materials to occur in developed or previously disturbed areas and minimizing the use of heavy equipment and machinery. Compliance with these requirements would ensure that the proposed Program would have a less than significant impact on water quality standards and waste discharge requirements.

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

The proposed Program would not require the use of, or otherwise substantially interfere with, groundwater supplies or recharge. The potential for impacts related to groundwater quality would be limited mainly to ground disturbances associated with maintenance activities. However, maintenance activities would be conducted in previously developed and disturbed areas. Furthermore, the proposed Program would not result in an increase of impervious surfaces or interfere with groundwater recharge. Therefore, no impacts 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, or through the addition of impervious surfaces, in a manner which would:	☐	☐	☒	☐
i) result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
iv) impede or redirect flood flows?	☐	☐	☒	☐

Existing surfaces within the maintenance areas could temporarily be disturbed during grading and vegetation management. While drainage patterns may change temporarily during these activities, required BMPs would minimize on- and off-site erosion through sediment control measures. Conformance with required BMPs would reduce potential impacts related to erosion and siltation during maintenance activities to less than significant. The proposed Program would repave existing access roads but would not result in an increase in impermeable surfaces that could contribute to increased surface runoff compared to existing conditions. Drainage patterns would potentially be affected temporarily by construction activities; however, the Program would require implementation of standard construction BMPs to reduce drainage alteration impacts to a less-than-significant level. No associated flooding would occur, and impacts would be less than significant.

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

Individual maintenance activities would occur at a range of locations within San Diego County. Therefore, there is the potential for Program activities to be located on or adjacent to lands subject to flood hazards or seiches. However, BMPs would ensure that hazardous materials equipment would not be present during a flood event. In addition, due to their locations inland and at high elevations, there would be no tsunami risk from the Program. As such, impacts related to the release of pollutants due to inundation in flood hazard, tsunami, and seiche zones would be less than significant.

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

The activities would not adversely impact a groundwater management plan because the Program would not impede groundwater replenishment and would not require the use of groundwater. No related impacts would occur.

XI. LAND USE AND PLANNING – Would the project:

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

The Program area generally encompasses open space and recreation areas that are public or semi-public facilities situated within undeveloped, open space, rural, and residential areas. Barrett Dam, El Capitan Dam, Morena Dam, San Vicente Dam, Sutherland Dam, and Dulzura Conduit are in more rural or undeveloped areas. Black Mountain Dam, Chollas Dam, Hodges Dam, Miramar Dam, Murray Dam, Rancho Bernardo Dam, Savage Dam, and Upper Otay Dam are in more suburban and developed areas, and in some cases, are entirely surrounded by residential development. The proposed Program is limited to the long-term, routine maintenance of existing infrastructure and would not disrupt or divide an established community by introducing new infrastructure or expanding existing infrastructure. No impact would occur.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

The proposed Program is limited to the long-term, routine maintenance of existing infrastructure and would not create new facilities or expand existing facilities. As such, the Program would not alter existing land uses nor interfere with existing land uses and would be consistent with the General Plans and the various Community Plans land use designations. No impact would occur.

As described above in Section IV (Biological Resources) and V (Cultural Resources), the proposed Program will comply with the City's Municipal Code Environmentally Sensitive Lands (ESL) Regulations (Chapter 14, Article 3, Division 1) and the Biology Guidelines and Historical Resource Guidelines contained in the City's Land Development Manual. Potentially significant impacts would be reduced to a less than significant level through implementation of the mitigation measures contained in the Program's MMRP.

The Program area occurs within the City's MSCP subarea plan which is a long-term regional conservation plan established to protect sensitive species and habitats. The City's MSCP subarea plan identifies lands designated as MHPA, which is a "hard-line" preserve developed by the City in cooperation with the wildlife agencies, developers, property owners, and various environmental groups. The MHPA contains important biological resources areas and corridors targeted for conservation and restricted from development. In the context of the City's MSCP subarea plan, Black Mountain Dam, Chollas Dam, Hodges Dam, Miramar Dam, Murray Dam, San Vicente Dam, Savage Dam, and Upper Otay Dam occur within the MHPA. Though Barrett Dam, El Capitan Dam, Morena Dam, Sutherland Dam, and Dulzura Conduit are located outside of the boundaries of the City's MSCP subarea plan, the dams and associated infrastructure are owned and operated by the City, and as such, will comply with the policies and guidelines of the City's MSCP subarea plan. The Program's consistency with the City's MSCP subarea plan applicable management directives, policies, and guidelines, are detailed Section 6.0 of the Program's BTR (Appendix B) and summarized below.

Compatible Land Uses (Section 1.4.1 of the MSCP)

The Program is considered conditionally compatible with the biological objectives of the City's MSCP subarea plan with allowable activities within the City's MHPA because the Program contains water facilities and other essential public facilities.

MHPA Guidelines and Exclusions (Section 1.2 of the MSCP)

The MSCP includes specific policies and guidelines that are unique to individual MHPA areas and are to be incorporated into the design of future projects within or adjacent to the MHPA. There is only one specific guideline that applies to the proposed Program for MHPA lands at Black Mountain Park in which Black Mountain Dam is located:

- *Guideline C21 – If purchased by the City's Water Utilities Department for water facility uses, the development areas shown may expand slightly.*

The City PUD constructed Black Mountain Dam between 2000 and 2003 thereby expanding the development area of MHPA lands that overlap this area. The proposed Program is limited to the long-term, routine maintenance of existing infrastructure and would not create new facilities or expand existing facilities.

General Planning Policies and Design Guidelines (Section 1.4.2 of the MSCP)

The MSCP establishes specific guidelines that limit activities that occur within the MHPA. In general, activities occurring within the MHPA must conform to these guidelines and, wherever feasible, should be located in the least sensitive areas. Applicable policies and guidelines from Section 1.4.2 of the MSCP include those related to roads and utilities; fencing, lighting, and signage; material storage; and flood control. A detailed description of the Program's conformance with these policies and guidelines is included Section 6.3 of the Program's BTR (Appendix B) and summarized below.

The proposed Program is limited to the long-term, routine maintenance of existing infrastructure and facilities and does not include the development of new facilities or expansion of existing facilities. Existing access roads, trails, and footpath would be used to access the dams and associated infrastructure and existing parking lots, staging and material storage areas, and disturbed areas will be utilized as staging areas. Existing access roads and trails are compatible for use within the MHPA, and maintenance of such roads is a covered maintenance activity. No temporary widening of existing access features is proposed, and no new access roads or staging areas would be constructed as part of the Program. No new fencing, barriers, or lighting resources would be installed as part of the Program. No additional berming, channelization, or barriers to existing creeks, rivers, and drainages beyond those that are currently in place would occur. Existing riprap, concrete, and creek stabilization structures shall be maintained in their current condition. The City will obtain the appropriate regulatory permits with the appropriate agencies prior to the commencement of maintenance activities that would result in impacts to jurisdictional waters and wetlands. Compensatory mitigation for impacts to waters and wetlands subject to the jurisdiction of the Regulatory Agencies (USACE, RWQCB, and CDFW) will be completed in accordance with the appropriate permits and applicable requirements. As such, the Program is consistent with the MSCP general planning policies and design guidelines.

Land Use Adjacency Guidelines (Section 1.4.3 of the MSCP)

The MSCP addresses indirect impacts to preserve areas from adjacent development in Section 1.4.3, Land Use Adjacency Guidelines (LUAGs). The LUAGs provide requirements for land uses adjacent to the habitat preserve in order to minimize indirect impacts from drainage, toxics, lighting, noise, barriers, invasive species, brush management, and grading to the sensitive resources contained therein. Projects that are within or adjacent to the MHPA must demonstrate compliance with the LUAGs. A detailed description of the Program's conformance with the City's LUAGs is included Section 6.4 of the Program's BTR (Appendix B) and summarized below.

The Program is limited to the routine maintenance of existing infrastructure and does not include the construction of newly developed or paved areas that would drain directly into the MHPA, or the creation of recreational areas or any other uses that would introduce new toxins, chemicals, or by-products within the MHPA. Best Management Practices (BMPs) would be implemented during Program activities, as necessary, in order to prevent the release of toxins, chemicals, petroleum

products, exotic plant materials, and other elements into the MHPA. No new fencing, barriers, or lighting resources would be installed as part of the Program. Maintenance activities are anticipated to take place during daylight hours. However, if night work must occur during Program activities, any temporary artificial night lighting required to complete activities would be shielded and directed down or away from the MHPA to protect resources in the MHPA from artificial night lighting. Standard protection requirements and mitigation measures would be implemented if maintenance activities requiring heavy machinery within or adjacent to the MHPA were to occur during the breeding season for sensitive avian species, such as CAGN, LBVI, and SWFL, to ensure that ensure that no significant and adverse indirect noise impacts occur to breeding CAGN, LBVI, or SWFL within the MHPA. As such, the Program is consistent with the City's LUAGs.

General Management Directives (Section 1.5.2 of the MSCP)

The general management directives outlined in Section 1.5.2 of the City's MSCP subarea plan apply to all projects within the City's MSCP. A detailed description of the Program's conformance with the City's LUAGs is included Section 6.5 of the Program's BTR (Appendix B) and summarized below.

No new trails, overlooks, or staging areas would be created under the Program. Existing access roads and trails, staging and material storage areas, parking lots, and disturbed areas will be utilized as staging areas for any equipment required to complete maintenance activities. Temporary staging and storing of equipment and materials during maintenance activities will occur within existing parking lots and disturbed areas and will be removed from the area following completion of maintenance activities. Appropriate BMPs will be implemented during maintenance activities to avoid the introduction of invasive plants into the Program area by equipment. Maintenance activities under the Program that involve the clearing of riparian vegetation or dredging work that involves removal or disturbance to riparian vegetation shall occur outside of the breeding season for sensitive riparian bird species such as LBVI (March 15 through September 15) and SWFL (May 1 through August 30). If clearing of riparian vegetation must occur between March 15 to September 15, implementation of species-specific mitigation measures for LBVI and SWFL would ensure that no significant impact would occur to either species. Furthermore, unavoidable impacts to sensitive biological resources associated with routine maintenance activities will be mitigated in accordance with the City's ESL regulations and Biology Guidelines, as detailed in Section IV. All proposed mitigation would be subject to the approval of the City, as well as state and federal agencies, as applicable. As such, the Program is consistent with the MSCP general management directives.

Area Specific Management Policies and Directives

The MSCP identifies Area Specific Management Directives (ASMDs) for planned areas of the MHPA. Portions of the Program are located within the following MHPA Planning Areas: Urban Habitat Lands, Northern Area, Lake Hodges, and other Cornerstone Lands. The City's MSCP subarea plan does not include any specific management policies and directives for Urban Habitat Lands. The Program's conformance with the applicable ASMDs for the Northern Area, Lake Hodges, and Cornerstone Lands is included Section 6.6 of the Program's BTR (Appendix B) and summarized below.

Black Mountain Dam and Miramar Dam are located within or adjacent to the Northern Area of the MHPA. Black Mountain Dam is located within the Black Mountain Park Area of the MHPA. The City's MSCP subarea plan includes two ASMDs relating to this area, one of which is applicable to the Program. The applicable ASMD requires that all access areas and trails be clearly marked with post signage to prevent off-trail access and use. Perimeter chain-link fencing surrounds Black Mountain Dam, and the facility is accessed via a gated paved access road from Carmel Valley Road, preventing off-trail access and use of the area. There are no public trails to or from Black Mountain Dam. As such, the Program is consistent with the ASMDs for the Black Mountain Park Area. The City's MSCP SAP does not include any specific management policies and directives for MHPA lands at Miramar Reservoir.

Hodges Dam is within the Lake Hodges/San Pasqual Valley area of the MHPA. There are six Priority 1 ASMDs and two Prior 2 ASMDs relating to the area west of Interstate 15 where Hodges Dam is located. These generally relate to public use of authorized trails, the restriction of public access to sensitive areas, and erosion control. There are multiple access gates and signage along the access roads to Hodges Dam, restricting public use of the area. Existing trails, access gates and fencing (where present), and signage at Hodges Dam will continue to be maintained by City PUD and Parks and Recreation Department. No new trails, overlooks, or staging areas would be created under the Program. Access to the Program facilities would occur via existing access roads and trails. City PUD and Parks and Recreation Department currently perform routine maintenance of existing recreational and public facilities at Hodges Reservoir. Typical management activities regular patrolling; removal of trash and other refuse; maintenance of existing facilities, access roads, and public use trails; and vegetation management. Implementation of the Program would not interfere with or otherwise disrupt these activities. Appropriate BMPs would be implemented during maintenance activities that would include measures to control erosion and avoid the introduction of invasive plants into the Program area. As such, the Program is consistent with the ASMDs for the Lake Hodges/San Pasqual Valley area.

Hodges Dam, San Vicente Dam, Savage Dam, and Upper Otay Dam are located within or adjacent to Cornerstone Lands of the MHPA. The City's MSCP SAP does not include any specific management policies and directives for Cornerstone Lands. These lands are currently maintained and managed by the City (PUD and Parks and Recreation Department) in accordance with the MSCP. Implementation of the Program would not interfere with or otherwise disrupt these activities.

Conditions of Coverage for Covered Species

Special status plant and animal species covered by the MSCP are considered adequately conserved provided that the conditions described in the Appendix A of the City's MSCP subarea plan are implemented. A total of 16 MSCP-covered species were observed within the Program area, and an additional 12 MSCP-covered species were determined to have a high potential to occur as follows:

Plants

- Observed (3): San Diego goldenstar, San Diego barrel cactus, and wart-stemmed ceanothus.

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

- High Potential to Occur (9): San Diego ambrosia, thread-leaved brodiaea, Orcutt's brodiaea, Dunn's mariposa lily, slender-pod jewelflower, Lakeside ceanothus, San Miguel savory, variegated dudleya, and small-leaved rose.

Animals

- Observed (13): arroyo toad, Belding's orange-throated whiptail, Blainville's (San Diego) horned lizard, bald eagle, Canada goose, coastal cactus wren, CAGN, Cooper's hawk, LBVI, peregrine falcon, southern California rufous-crowned sparrow, western bluebird, and mule deer.

- High Potential to Occur (3): golden eagle, northern harrier, and mountain lion.

A detailed description of the Program's conformance with the MSCP conditions of coverage for these species is included Section 6.7 of the Program's BTR (Appendix B). The Program would not create new facilities or expand existing facilities, and maintenance activities conducted under the Program would be limited to areas immediately surrounding existing facilities potential impacts. The Program would conform with the City's LUAGs and would not substantially add to edge effects already present in the existing condition in the Program area. Areas within the MHPA will continue to be managed by City PUD and Parks and Recreation Department in accordance with the MSCP, which includes regular patrolling and limiting public access in the MHPA (i.e., fencing along trails and appropriate signage), thus guarding against the unauthorized impacts to these species, measures to control non-native predator populations, and reducing the risk of unauthorized fires. Potentially significant direct and indirect impacts to MSCP covered species would be mitigated to a less than significant level through implementation of the mitigation measures presented in the MMRP which include habit-based mitigation, breeding bird avoidance including the incorporation of required nest setbacks for sensitive avian species, and species-specific mitigation, where required. As such, the Program is consistent with the MSCP conditions of coverage.

XII. MINERAL RESOURCES – Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☒	☐

The proposed Program includes routine maintenance of existing dams and associated infrastructure at various locations throughout San Diego County. As such, individual activities could occur in a wide range of locations and could potentially be located on or adjacent to lands designated as Mineral Resource Zone (MRZ)-2 by the Division of Mines and Geology (DMG) or in areas with active mining operations. MRZ-2 is defined as an area where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presents exist. San Diego County is known to contain sand, gravel, and granitic rock deposits suitable for aggregate, and there are several designated mineral resource recovery sites and MRZ-2 zoned lands in the region. Therefore, while it is possible that maintenance activities may be located in alluvial areas known to contain valuable loose sands and gravel and include activities such as minor grading or vegetation management, it would not include significant earthwork, construction, or other activities that would result in the loss of availability of a known mineral resource that will be of value to the region and

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

the residents of the state. Furthermore, such activities would not affect the potential for future mining activities at these sites or change the existing land uses. Therefore, impacts would be less than significant.

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

The proposed Program includes routine maintenance of existing dams and associated infrastructure at various locations throughout San Diego County. As such, individual activities could occur in a wide range of locations and could potentially be located on or adjacent to lands where adequate information indicates that significant mineral deposits are present or where it is judged that a high likelihood for their presents exist. San Diego County is known to contain sand, gravel, and granitic rock deposits suitable for aggregate, and there are several designated mineral resource recovery sites and MRZ-2 zoned lands in the region. Therefore, while it is possible that maintenance activities may be located in an area delineated on a local general plan, specific plan, or other land use plan with mineral resources, the proposed Program would not include significant earthwork, construction, or other activities that would result in the loss of availability of a locally important mineral resource. Furthermore, such activities would not affect the potential for future mining activities at these sites or change the existing land uses. Therefore, impacts would be less than significant.

XIII. NOISE – Would the project result in:

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

The San Diego region is a diverse region with a variety of land uses, habitats, and climatic and topographic conditions. The existing conditions at each dam location and along the Dulzura Conduit corridor range from urban to suburban to rural and open space. As such, individual activities could occur in a wide range of locations and could potentially be located adjacent to noise sensitive land uses (NSLUs) such as residences, schools, or biologically sensitive habitat. Dams located within or adjacent to urban or suburban areas include Chollas, Rancho Bernardo, Miramar, Upper Otay, Black Mountain, and Murray. Dams located in largely undeveloped or rural locations include Savage, Hodges, San Vicente, El Capitan, Sutherland, Morena, and Barrett. The areas surrounding the Dulzura Conduit are largely open space or undeveloped.

The following discussion was informed by noise modeling from the Program's Noise Assessment Study (HELIX 2022e). Noise-generating activities associated with the Program would include mobile equipment used for access road maintenance, vegetation clearing, tree removal, dredging, spillway cleaning, and dam and conduit repairs. Noise levels are addressed at a programmatic level based on the types of equipment that may be used during each activity. Construction equipment that would

be used for the Program's access road maintenance, vegetation clearing, tree removal, dredging, spillway cleaning, dam and concrete repairs includes skid-steers, dozers, backhoes, excavators, dump trucks, cranes, loaders, and helicopters.

Because construction equipment would not be used at a standard distance from nearby noise-sensitive land uses or biologically sensitive habitats, the Noise Assessment Study analyzed individual construction equipment to determine the distances within which noise would be significant. If a sensitive land use, such as a nearby residence or habitat, is located within the distances specified below in Table 5, *Construction Equipment Setback Distances* impacts from construction noise would be potentially significant.

Table 5
CONSTRUCTION EQUIPMENT SETBACK DISTANCES

Equipment Type	Percentage Used per Hour	Distance Within Which Noise Levels Would Exceed Threshold	
		Biologically Sensitive Habitat[1]	Noise-Sensitive Land Uses[2]
Bobcat/Skid-steer	40	178 feet	31 feet
Dozer	40	385 feet	68 feet
Backhoe	40	240 feet	43 feet
Chainsaw	20	178 feet	32 feet
Excavator	40	343 feet	61 feet
Dump Truck	40	211 feet	38 feet
Crane	16	214 feet	38 feet
Loader	20	202 feet	36 feet
Jackhammer	20	623 feet	111 feet

Source: Noise Assessment Study (Appendix E; HELIX 2022e); CadnaA

[1] Threshold is noise levels exceeding 60 dBA L_{EQ} (one hour)

[2] Threshold is noise levels exceeding 75 dBA L_{EQ} (8 hour or 12 hour)

As shown in Table 5 the distances within which noise levels would exceed the 60 dBA (A-weighted decibel) L_{EQ} (time-averaged noise level; one hour) limit for biologically sensitive habitat and 75 dBA L_{EQ} (8 hour or 12 hour) limit for NSLUs. Because it cannot be guaranteed that individual construction equipment would be used outside the setback distances provided in Table 5, or that construction equipment would be used for shorter time periods than assumed in Table 5, impacts from temporary construction noise would be significant without mitigation. Therefore, mitigation measure **NOI-1** would implement a construction noise management plan to reduce noise levels to NSLUs to a less than significant level. With regard to permanent increases in noise levels, noise from the maintenance activities would be temporary and would last only for the duration of each activity. No potential exists to produce permanent increases in noise as a result of the Program.

As stated in Section IV, impacts to biologically sensitive habitat (CAGN and suitable CAGN habitat) would be reduced to a less than significant level through implementation of mitigation measure **BIO-7** which includes habitat-based mitigation and avoidance measures to ensure maintenance activities do not disturb CAGN during the breeding season

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

In addition, aircraft such as helicopters are anticipated to be used for loading and unloading of equipment or to remove large trees in areas inaccessible to vehicles. Aircraft would therefore only be required near undeveloped areas away from NSLUs. Aircraft use associated with individual Program activities would be brief and would not remain stationary over any specific location. Impacts would be significant if a helicopter is located within 1,760 feet of a biologically sensitive habitat or within 313 feet of a NSLU. Because the Program would only require the use of helicopters in inaccessible areas, impacts to NSLUs are considered less than significant. Helicopter use during the breeding seasons of avian species, however, would exceed the 60 dBA LEQ (one hour) noise limits if used within 1,760 feet of biologically sensitive habitat, and impacts would be potentially significant. Mitigation measure **NOI-2** would restrict non-emergency aircraft use for Program activities to outside the avian breeding season.

With implementation of mitigation measures **NOI-1, NOI-2**, and **BIO-7**, construction noise impacts from Program activities would be reduced to less than significant levels.

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

No vibration-sensitive land uses (i.e., land uses where equipment or operations would be disrupted by excessive vibration) are located within the immediate vicinity of the maintenance sites. However, excessive levels of groundborne vibration of either a regular or an intermittent nature can result in annoyance to residential uses. The maintenance activities required under the Program would require the equipment types described in Table 5. This equipment may generate small amounts of vibration but are not anticipated to generate excessive groundborne vibrations or noise levels at nearby NSLUs. Due to the temporary nature of construction activities, impacts related to vibration are considered less than significant.

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

The Program's maintenance activities would occur in a wide range of locations throughout San Diego County, potentially including within an airport land use plan or within two miles of a public airport or public use airport where such a plan has not been adopted. However, the Program does not propose changes in land use or improvements that would expose people to excessive noise levels associated with proximity to a public airport or private airstrip. Therefore, there would be no impacts to airport land use noise compatibility.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING – Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒

The proposed Program includes routine maintenance of existing dams and associated infrastructure at various locations throughout San Diego County. The Program is limited to the routine maintenance of existing infrastructure and facilities and does not propose the new development of utilities or additional facilities. The Program will utilize existing access roads and trails, and footpaths to access the dams, associated infrastructure, and temporary work areas. Therefore, maintenance activities would not induce population growth because they do not propose any physical or regulatory change that would involve removing a restriction to or encouraging population growth in an area. Since the proposed project would not result in these changes, no new population growth would occur. Therefore, no population impacts would not occur.

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

The proposed Program includes routine maintenance of existing dams and associated infrastructure at various locations throughout San Diego County. The Program is limited to the routine maintenance of existing infrastructure and facilities and does not propose the new development of utilities or additional facilities. The Program will utilize existing access roads and trails, and footpaths to access the dams, associated infrastructure, and temporary work areas. Therefore, maintenance activities would not result in the displacement of people or housing. As such, housing impacts would not occur.

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;	☐	☐	☐	☒

The proposed Program includes routine maintenance of existing dams and associated infrastructure at various locations throughout San Diego County. The Program is limited to maintenance of existing infrastructure and facilities and does not propose the development of new facilities that would accommodate population growth or necessitate the provision of additional public services. The Program would not place additional demand on fire services. No impact to public services would occur as a result of the proposed Program.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ii) Police protection;	☐	☐	☐	☒

The proposed Program includes routine maintenance of existing dams and associated infrastructure at various locations throughout San Diego County. The Program is limited to maintenance of existing infrastructure and facilities and does not propose the development of new facilities that would accommodate population growth or necessitate the provision of additional public services. The Program would not place additional demand on police services. No impact to public services would occur as a result of the proposed Program.

iii) Schools;	☐	☐	☐	☒

The proposed Program includes routine maintenance of existing dams and associated infrastructure at various locations throughout San Diego County. The Program is limited to maintenance of existing infrastructure and facilities and does not propose the development of new facilities that would accommodate population growth or necessitate the provision of additional public services. The Program would not place additional demand on existing schools. Therefore, no impacts to public services would occur as a result of the proposed Program.

iv) Parks;	☐	☐	☐	☒

The proposed Program includes routine maintenance of existing dams and associated infrastructure at various locations throughout San Diego County. The Program is limited to maintenance of existing infrastructure and facilities and does not propose the development of new facilities that would accommodate population growth or necessitate the provision of additional public services. The Program would not place additional demand on existing parks. Therefore, no impacts to public services would occur as a result of the proposed Program.

v) Other public facilities?	☐	☐	☐	☒

The proposed Program includes routine maintenance of existing dams and associated infrastructure at various locations throughout San Diego County. The Program is limited to maintenance of existing infrastructure and facilities and does not propose the development of new facilities that would accommodate population growth or necessitate the provision of additional public services. The Program would not result in the need for additional governmental facilities. Therefore, no impacts to public services would occur as a result of the proposed Program.

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?	☐	☐	☐	☒

Individual activities under the proposed Program would not result in any changes to existing land uses that would accelerate or result in the deterioration of recreational facilities. Therefore, no impacts to recreational facilities would occur as a result of Program implementation.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☐	☒

Individual activities under the proposed Program would not include any new development, including but not limited to a residential subdivision, mobile home park, or construction of any use that may increase the use of existing neighborhood or regional parks or other recreational facilities. Therefore, no impacts to recreational facilities would occur as a result of Program implementation.

XVII. TRANSPORTATION–

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

The proposed Program includes routine maintenance of existing dams and associated infrastructure at various locations throughout San Diego County. The Program does not include the construction of habitable structures or stationary sources that would result in additional trips upon the completion of routine maintenance for existing infrastructure. The use of automobiles, light trucks, and heavy trucks would be required to transport workers, materials, and equipment during maintenance activities. According to the Air Quality and Greenhouse Gas Emissions Letter, the calculation of on-road traffic assumed an average of 20 daily worker trips and an average of 10 daily truck trips for individual maintenance activities (HELIX 2022). Therefore, the limited nature of Program-related traffic would not result in a substantial increase in traffic volumes or result in development that could conflict with applicable transportation plans. Impacts to applicable transportation plans, including transit, roadway, bicycle, and pedestrian facilities would be less than significant.

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

The proposed Program includes routine maintenance of existing dams and associated infrastructure at various locations throughout San Diego County. According to the Air Quality and Greenhouse Gas Emissions Letter, the calculation of on-road traffic assumed an average of 20 daily worker trips and an average of 10 daily truck trips for hauling equipment and material to the facility sites and removing debris (HELIX 2022). The fleet mix was assumed to be cars and light trucks for workers and heavy trucks for hauling. The addition of these vehicles on roadways in San Diego County would not exceed the thresholds identified in the City of San Diego's Transportation Study Manual. Therefore, impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Would the project or plan/policy substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒

The proposed Program includes routine maintenance of existing dams and associated infrastructure at various locations throughout San Diego County. The Program would not result in new development that could increase hazards due to a design feature or incompatible uses. Therefore, no impact would occur.

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

The proposed Program involves maintenance activities that would require the periodic use of vehicles and light trucks. While maintenance activities are not anticipated to result in any road or lane closures, should these be needed, the City would be required to prepare and comply with a traffic control plan which would include measures to minimize effects and ensure emergency access. Additionally, the proposed Program would use existing staging areas and would not introduce new structures or residents to the region that may result in slower emergency response. Therefore, no impact would occur.

XVIII. TRIBAL CULTURAL RESOURCES – Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☐	x

Tribal Cultural Resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the CRHR or included in a local register of historical resources, as defined in subdivision (k) of Public Resources Code Section 5020.1.

Twenty-one prehistoric archaeological resources have been identified within the Program APE. All of the archaeological resources are being considered historical resources for the purposes of the Program, except for those determined to be destroyed or those that do not possess the characteristics necessary to be considered resources eligible for listing on the CRHR, such as isolates. Of these 21 resources, 12 are located within the Program's maintenance areas. Two are in locations that are likely to have been previously destroyed and would not be affected by Program activities. Another would not be eligible for listing in the CRHR or NRHP. The remaining archaeological resources would be located within the Program's designated Environmentally Sensitive Areas (ESAs), which would preclude Program activities except for vegetation removal that does not involve ground disturbance, as such would not have the potential to cause a substantial adverse change in the significance of a resource.

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

None of the identified archaeological resources would be impacted by Program maintenance activities, and impacts would not occur.

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.	☐	☐	☐	x

As described above Tribal Cultural Resources include sites, features, places, cultural landscapes, and sacred places or objects that have cultural value or significance to a Native American Tribe. Tribal Cultural Resources include “non-unique archaeological resources” that, instead of being important for “scientific” value as a resource, can also be significant because of the sacred and/or cultural tribal value of the resource. Tribal representatives are considered experts appropriate for providing substantial evidence regarding the locations, types, and significance of tribal cultural resources within their traditionally and cultural affiliated geographic area.

In accordance with the requirements of Assembly Bill (AB) 52, The City of San Diego sent notification letters to the Native American Tribes traditionally and culturally affiliated with the project area on September 16, 2022, including San Pasqual Band of Mission Indians, Jamul Indian Tribe and the Iipay Nation of Santa Ysabel. Both the Jamul Indian Tribe and The Iipay Nation Of Santa Ysabel did not respond to the notification. However, on 9/26/2022 The San Pasqual Band of Mission Indians responded and requested further consultation. A virtual consultation meeting took place on October 6, 2022 with the City of San Diego and The San Pasqual Band. In the meeting The San Pasqual Band concurred with the finding that no impacts would occur to Tribal Cultural Resources and the AB 52 concluded. No impacts would occur.

XIX. UTILITIES AND SERVICE SYSTEMS – Would the project:

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

The proposed Program includes routine maintenance of existing dams and associated infrastructure at various locations throughout San Diego County. The proposed Program does not include any new development such as new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities. Impacts associated with the proposed Program would not occur.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☐	☒

The proposed Program would not require the provision of water utilities, As such, impacts associated with the proposed Program would not occur.

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

The Program would not generate wastewater. Program-related impacts associated with water quality and drainage are analyzed under section X. *Hydrology and Water Quality*. As such, impacts associated with the proposed Program would not occur.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐

Proposed maintenance activities would require minor grading and dredging, spillway cleaning, and vegetation management, which could potentially generate solid waste. If such activities require solid waste disposal, there are numerous solid waste disposal facilities within the San Diego region with remaining capacity. Therefore, there would be sufficient existing permitted solid waste capacity to accommodate the proposed Program's solid waste disposal needs. Impacts associated with the proposed Program would be less than significant.

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

Proposed maintenance activities would require minor grading and dredging, spillway cleaning, and vegetation management, which could potentially generate solid waste. If such activities require solid waste disposal, there are numerous solid waste disposal facilities within the San Diego region with remaining capacity. All solid waste facilities, including landfills require solid waste facility permits to operate. Therefore, impacts associated with the proposed Program would be less than significant.

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

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

The proposed Program involves maintenance activities that could require the periodic use of vehicles and light trucks. While maintenance activities are not anticipated to result in any road or

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

lane closures, should these be needed, the City would be required to prepare and comply with a traffic control plan which would include measures to minimize effects and ensure safe passage of evacuees or emergency response vehicles. Additionally, the proposed Program would use existing staging areas and would not introduce new structures or residents to the region that may result in slower emergency response or evacuation times. Therefore, impacts would be less than significant.

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

The California Department of Forestry and Fire Protection (CAL FIRE) has mapped areas of significant fire hazards in San Diego County through their Fire and Resource Assessment Program (FRAP). These maps place areas of the County into different Fire Hazard Severity Zones (FHSZ) based upon fuels, terrain, weather, and other relevant factors. The FRAP divides areas of significant fire hazard into two designations: State Responsibility Areas (SRA), which are areas where CAL FIRE is responsible for wildfire protection, and Local Responsibility Areas (LRA), where local fire protection agencies are responsible for wildfire protection. The majority of the unincorporated area of the County is SRA lands. The FHSZs are divided into three levels of fire hazard severity: Moderate, High, and Very High. The majority of the County is in the High and Very High FHSZ. According to the maps prepared for the Program area by CAL FIRE, the proposed Program includes components that are within High and Very High FHSZs (CAL FIRE 2022). Program activities would remove vegetation along existing roadways, trails, and on and around dams and spillways, however this work would be conducted to reduce hazards. Vegetation removal would not involve root removal and would not impact slope stability. Maintenance activities would be short-term and temporary and would therefore not expose workers to substantial pollutants from wildfires that may occur in nearby areas. Individual maintenance activities under the proposed Program could result in a greater risk of fire due to the presence of mechanical equipment and workers in High and Very High FHSZs. To minimize the risk of wildfire, fire prevention strategies outlined in mitigation measure **FIRE-1** would be implemented during project construction. Implementation of a Fire Safety Plan under mitigation measure **FIRE-1** would be reduce impacts to below a level of significance.

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?	☐	☐	☒	☐

The proposed Program would not involve the installation of new infrastructure requiring additional maintenance. The Program would allow for maintenance of existing infrastructure; however, the Program would not result in a long-term increase of maintenance activities. Impacts would be less than significant.

Issue	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
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?	☐	☐	☒	☐

Individual maintenance activities under the proposed Program could result in a greater risk of fire and therefore post-fire runoff, slope stability, or drainage changes due to the presence of mechanical equipment and workers in High and Very High FHSZs. To minimize the risk of wildfire, fire prevention strategies outlined in mitigation measure **FIRE-1** would be implemented during project construction. Implementation of a Fire Safety Plan under mitigation measure **FIRE-1** would be reduce impacts to below a level of significance.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE –				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number, or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	x	☐	☐

Potentially significant impacts to the environment resulting from the proposed project have been identified for the areas of biological resources. However, due to the implementation of required mitigation measures the project would not substantially degrade the quality of the environment, cause fish or wildlife populations to drop below self-sustaining levels or threaten to eliminate a plant or animal community. While the project has the potential to cause direct and indirect impacts to sensitive species but impacts would be reduced to below a level of significance through the implementation of mitigation measures.

Please Section V of the above, impacts to Cultural Resources were not identified and major periods of California history and prehistory would not be eliminated.

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)?	☐	x	☐	☐

Cumulative environmental impacts are those impacts that by themselves are not significant, but when considered with impacts occurring from other projects in the vicinity would result in a

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

cumulative impact. Related projects considered to have the potential of creating cumulative impacts in association with the project consist of projects that are reasonably foreseeable and that would be constructed or operated during the life of the project.

As documented in this Initial Study, the project may have the potential to degrade the quality of the environment, notably with respect to Biological Resources and Noise, which may have cumulatively considerable impacts. As such, mitigation measures have been incorporated to reduce impacts to less than significant. Other future projects within the surrounding neighborhood or community would be required to comply with applicable local, State, and Federal regulations to reduce the potential impacts to less than significant, or to the extent possible. As such, the project is not anticipated to contribute potentially significant cumulative environmental impacts.

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

The project is consistent with the environmental setting and with the use as anticipated by the City. Based on the analysis presented above, implementation of the mitigation measures would reduce environmental impacts such that no substantial adverse effects on humans would occur.

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

INITIAL STUDY CHECKLIST
REFERENCES

I. Aesthetics / Neighborhood Character

☐ City of San Diego General Plan

II. Agricultural Resources & Forest Resources

☐ City of San Diego General Plan
☐ California Agricultural Land Evaluation and Site Assessment Model (1997)

III. Air Quality

☐ Regional Air Quality Strategies (RAQS) - APCD
☐ Site Specific Report:
Air Quality and Greenhouse Gas Emissions Assessment for the City of San Diego Dam Maintenance Program, prepared by HELIX Environmental Planning, 2022a

IV. Biology

☐ City of San Diego Land Development Code Biology Guidelines
☐ Site Specific Report:
Biological Technical Report for the City of San Diego Dam Maintenance Program, prepared by HELIX Environmental Planning, 2022b.

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

☐ City of San Diego Historical Resources Guidelines
☐ City of San Diego Archaeology Library
☐ Historical Resources Board List
☐ Community Historical Survey:
☐ Site Specific Report:
Cultural Resources Technical Report for the City of San Diego Dam Maintenance Program, prepared by HELIX Environmental Planning, 2022c.
☐ Site Specific Report:
City of San Diego Source Water System Historical Resources Assessment for the City of San Diego Dam Maintenance Program, prepared by HELIX Environmental Planning, 2022d.

VI. Geology/Soils

☐ City of San Diego Seismic Safety Study
☐ U.S. Department of Agriculture Soil Survey - San Diego Area, California, Part I and II, December 1973 and Part III, 1975
☐ City of San Diego Paleontological Guidelines

VII. Greenhouse Gas Emissions

☐ Site Specific Report:
Air Quality and Greenhouse Gas Emissions Assessment for the City of San Diego Dam Maintenance Program, prepared by HELIX Environmental Planning, 2022a
☐ City of San Diego Climate Action Plan (December 2015)

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

☐ City of San Diego Memorandum: Climate Action Plan Consistency for Plan- and Policy-Level Environmental Documents and Public Infrastructure Projects (June 17, 2022)

VIII. Hazards and Hazardous Materials

☐ San Diego County Hazardous Materials Environmental Assessment Listing
☐ San Diego County Hazardous Materials Management Division
☐ State Assessment and Mitigation, Unauthorized Release Listing, Public Use Authorized

XI. Mineral Resources

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

XII. Noise

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

Noise Assessment Study for the City of San Diego Dam Maintenance Program, prepared by HELIX Environmental Planning, 2022e.

XVII. Transportation / Circulation

☐ Site Specific Report:

Air Quality and Greenhouse Gas Emissions Assessment for the City of San Diego Dam Maintenance Program, prepared by HELIX Environmental Planning, 2022a

XX. Water Quality

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