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4.18 CUMULATIVE ANALYSIS

4.18.0 Introduction

This section discusses potential cumulative impacts related to the construction and operation and maintenance (O&M) of the proposed San Diego Gas & Electric Company (SDG&E) TL674A Reconfiguration & TL666D Removal Project (Proposed Project). The California Environmental Quality Act (CEQA) Guidelines require a discussion of the cumulative impacts of a project. Cumulative impacts refer to two or more individual impacts that, when considered together, are considerable or that compound or increase other environmental impacts. The following cumulative analysis evaluates the potential cumulative impacts from the Proposed Project in combination with other planned and proposed projects in the area. Based on the cumulative impacts analysis, the Proposed Project will not result in a significant cumulative environmental impact to any of the resource areas evaluated.

4.18.1 Significance Criteria

Section 15130(a)(1) of the CEQA Guidelines defines a cumulative impact as one “which is created as a result of the project...together with other [past, present, and future] projects causing related impacts.” Impacts will be considered significant if they exceed the individual criterion established for each resource area, as described in Section 4.1 Aesthetics through Section 4.17 Utilities and Service Systems; if this occurs, the Proposed Project’s contribution will be analyzed to determine whether it is cumulatively considerable (CEQA Guidelines § 15064[h][1]). Section 15064(h)(1) of the CEQA Guidelines further explains that “when assessing whether a cumulative effect requires an [Environmental Impact Report], the lead agency shall consider whether the cumulative impact is significant and [whether] the project’s incremental effect, though individually limited, is ‘cumulatively considerable.’” Applying this qualitative standard necessarily requires application of judgment based on the facts of a particular project subject to CEQA. Further, the significance of an impact may be weighed against the overall effect as both increases and decreases in impacts may balance one another. As noted in Section 15064(h)(4) of the CEQA Guidelines, “the mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the proposed project’s incremental effects are cumulatively considerable.”

4.18.2 Timeframe of Analysis

For the purposes of this cumulative impacts analysis, the Proposed Project is defined in terms of construction duration and O&M. SDG&E anticipates that construction of the Proposed Project will take a total of approximately 12 months. Construction of the Proposed Project is anticipated to begin in January 2019, depending on agency approvals.

4.18.3 Area of Analysis

A list of planned and proposed projects within one mile of the Proposed Project has been developed in accordance with Section 15130(b) of the CEQA Guidelines. Potential cumulative impacts were analyzed within one mile of the Proposed Project components because this distance was estimated to be the farthest that Proposed Project impacts will extend. Potential cumulative impacts were also evaluated using existing land uses and aesthetics.

4.18.4 Methodology

Existing conditions and reasonably foreseeable projects were identified within a one-mile radius of each Proposed Project component. Information was gathered from Internet searches of local planning department and state agency websites and correspondence with agency staff. The websites of the following entities were reviewed, and/or these agencies were contacted regarding development projects, road and utility improvement projects, and capital investment projects:

- California Energy Commission,
- California Department of Transportation (Caltrans),
- California High-Speed Rail Authority,
- California Independent System Operator,
- California Public Utilities Commission,
- City of Del Mar,
- City of San Diego,
- City of Solana Beach,
- County of San Diego,
- San Diego Association of Governments (SANDAG),
- San Diego County Water Authority, and
- United States Department of Transportation,

4.18.5 Existing/Operating Projects

The Proposed Project alignment is located largely within an existing utility corridor. Land uses surrounding the Proposed Project are characterized by recreation and open space, residential, infrastructure, commercial, and industrial. The existing power line (i.e., TL666D) has been a part of the local landscape for several decades.

4.18.6 Foreseeable Projects Inventory

For the purposes of this document, “reasonably foreseeable” refers to projects that federal, state, or local agency representatives have knowledge of from the formal application process. Table 4.18-1: Planned and Proposed Projects within One Mile lists 16 known projects that are within one mile of any Proposed Project component. Given that the Proposed Project involves the reconfiguring and removal of existing power lines, it does not have the potential to change land use patterns in the area. Environmental impacts associated with the Proposed Project are expected to be less than significant or not impact most resources.

4.18.7 Potential Cumulative Impacts

This section discusses whether the Proposed Project will result in significant short-term or long-term environmental impacts when combined with other past, present, and planned and proposed projects in the area. Short-term impacts are generally associated with construction of the Proposed Project, while long-term impacts are those that result from permanent Proposed Project features or operation of the Proposed Project.

Table 4.18-1: Planned and Proposed Projects within One Mile

Project	Approximate Location	Approximate Distance from the Proposed Project (miles)	Project Description/Size	Status	Anticipated Construction Schedule	
					Start	End
Pipeline Rehabilitation AF1	Various roadways between Del Mar Heights Road and Carmel Valley Road in the Community of Torrey Pines, City of San Diego	Crossed – 0.24	Trenchless rehabilitation of approximately seven miles of existing eight-inch deteriorated sewer mains	In Construction	2016	2017
Watermark Del Mar	Southern corner of the intersection of Jimmy Durante Boulevard and San Dieguito Road, City of Del Mar	Adjacent	Multi-family residential development consisting of 12 structures that would feature 48 residential units, a vehicular access point from San Dieguito Road, and a parking structure	In Environmental Review	N/A	N/A
Water & Sewer Group 965 Capital Improvement Project	Sorrento Valley Road, Industrial Court, and Tripp Court, City of San Diego	0.06	Replacement of approximately 4,960 linear feet of water mains in the Torrey Pines community planning area	In Design	Mid-2017	2017
Ross Residence	13062 Via Grimaldi, City of San Diego	0.17	Construction of an approximately 2,895-square-foot, two-story, single-family residence	In Environmental Review	N/A	N/A

Project	Approximate Location	Approximate Distance from the Proposed Project (miles)	Project Description/Size	Status	Anticipated Construction Schedule	
					Start	End
Interstate (I-) 5/State Route (SR-) 56 Interchange Project	Intersection of I-5 and SR-56, City of San Diego	0.20	Traffic improvements on I-5 between Del Mar Heights Road and Carmel Valley Road, and on SR-56 between I-5 and Carmel Country Road	In Environmental Review	2020	2030
San Dieguito Double Track and Platform	Adjacent to the San Dieguito Lagoon, City of Del Mar ¹	0.21	Replacement of part of the Los Angeles-San Diego-San Luis Obispo (LOSSAN) rail corridor (an approximately 100-year-old wooden trestle across San Dieguito Lagoon) and approximately 1.1 miles of double track in the cities of Solana Beach and Del Mar	Finding of No Significant Impact Issued; Unfunded	Not Available (N/A)	2030
De Souza Residence (Project 452804)	12988 Via Esperia, City of San Diego	0.24	Demolition of an existing single dwelling unit and construction of a 3,640-square-foot single dwelling unit	Permits Issued	N/A	N/A
Los Peñasquitos Lagoon Bridges Replacement	Along the railway crossing over Los Peñasquitos Lagoon, City of San Diego	0.32	Part of the LOSSAN rail corridor that includes replacement of four aging wooden trestle railway bridges in the Los Peñasquitos Lagoon with modern concrete bridges	In Construction	2015	2017

¹ This project extends from the City of Los Angeles to the City of San Luis Obispo; however, the segment closest to the Proposed Project is located in the City of Del Mar.

Project	Approximate Location	Approximate Distance from the Proposed Project (miles)	Project Description/Size	Status	Anticipated Construction Schedule	
					Start	End
El Camino Real Bridge/Road Widening Project No. 2982	Along El Camino Real from Via De La Valle to San Dieguito Road, City of San Diego	0.46	Road modifications and bridge replacement along a segment of El Camino Real between Via De La Valle and San Dieguito Road	Approved	2019	2021
New One Paseo	Southwest corner of Del Mar Heights Road and El Camino Real, City of Del Mar	0.50	Development of a neighborhood village in Del Mar Heights on an empty, approximately 23.6-acre lot, including 608 housing units, 280,000 square feet of office space, and 95,000 square feet of retail	Approved	2017	2018
Del Mar City Hall/Town Hall Project	1050 Camino Del Mar, City of Del Mar	0.60	Redevelopment of the existing City Hall site with new public buildings and amenities	In Construction	2016	2019
Saint John Garabed (Project 240283)	13925 El Camino Real, City of San Diego	0.65	Construction of a 350-seat church, 500-seat multipurpose hall, education building, and gymnasium	Approved	N/A	N/A
The Estates at Del Mar Subdivision	929 Border Avenue, City of Del Mar	0.71	Subdivision of the property into five individual single-family residential lots west of Camino del Mar	Mitigated Negative Declaration (MND) Issued	N/A	N/A

Project	Approximate Location	Approximate Distance from the Proposed Project (miles)	Project Description/Size	Status	Anticipated Construction Schedule	
					Start	End
2016 Sewer and Water Group 1 Capital Improvement Project	City of Del Mar	0.85	Open-trench construction of approximately 5,175 linear feet of sewer line, point repairs of existing sewer mains, trenchless rehabilitation of 2,297 linear feet of sewer main, construction of 205 linear feet of six-inch water main, and decommissioning of the 7th Street Pump Station	Construction Contract Awarded	February 2017	August 2017
I-5/Genesee Avenue Interchange Project	Along I-5 from Sorrento Valley Road to Voigt Drive, City of San Diego	0.95	Replacement of the existing six-lane Genesee Avenue overpass with a 10-lane bridge	In Construction	2015	2017
Spectrum III and IV	3115 Merryfield Row and 3215 Merryfield Row, City of San Diego	0.98	Demolition of existing research and development buildings, and construction of a new research and development buildings at on an approximately 13.77-acre site	Approved	N/A	N/A

Sources: Caltrans 2016a-b; City of Del Mar 2015, 2016a-d; City of San Diego 2016a-i; SANDAG 2016a-b; Transnet 2016.

This impact analysis focuses primarily on construction activities for all components of the project including reconfiguration of TL647A, removal of TL666D from service, and converting portions of existing 12 kilovolt distribution lines from an overhead to underground configuration. O&M activities will be conducted in the same manner as they were prior to construction of the Proposed Project. Based on the removal of existing overhead facilities and the installation of Proposed Project components in areas already covered by existing O&M activities, O&M requirements in the Proposed Project area will be reduced. Therefore, the O&M activities associated with the Proposed Project will not contribute to a cumulative analysis, and are not addressed further in this analysis.

Construction of the Proposed Project will not impact the following resources and, therefore, will not contribute a cumulative effect to these resource areas:

- Agriculture and Forestry Resources,
- Land Use and Planning,
- Mineral Resources, and
- Population and Housing.

As a result, these resource areas were not further analyzed with regard to cumulative impacts.

Cumulative impacts to the following resources could occur as a result of construction of the Proposed Project in conjunction with the other planned and proposed projects:

- Aesthetics,
- Air Quality,
- Biological Resources,
- Cultural Resources,
- Geology and Soils,
- Greenhouse Gas (GHG) Emissions,
- Hazards and Hazardous Materials,
- Hydrology and Water Quality,
- Noise,
- Public Services,
- Recreation,
- Transportation and Traffic, and
- Utilities and Service Systems.

These resources are discussed further in the subsections that follow.

Aesthetics

Cumulative impacts to visual resources could occur where Proposed Project facilities are viewed in combination with other planned and proposed developments. The significance of cumulative visual impacts depends on a number of factors, including the degree to which the viewshed is altered and the extent to which scenic resources in the area are disrupted due to either view obstructions or direct impacts to scenic resource features. The Proposed Project viewshed is defined as the general area from which it is visible or can be seen. For the purposes of this

analysis, the potential effects on foreground viewshed conditions are emphasized. The foreground is defined as the zone between 0.25 and 0.5 mile from the viewer. Landscape detail is most noticeable and objects generally appear most prominent when seen in the foreground.

As discussed in Section 4.1 Aesthetics, construction of the Proposed Project will have a temporary, less-than-significant impact on scenic vistas, scenic resources within a state scenic highway, visual character degradation, and light or glare during construction activities. Of the planned and proposed projects listed in Table 4.18-1: Planned and Proposed Projects within One Mile, the following six planned and proposed projects are located within 0.5 mile from the Proposed Project and have a construction schedule that may overlap or is unknown and could overlap with the Proposed Project:

- Watermark Del Mar,
- Ross Residence,
- I-5/SR-56 Interchange Project,
- San Dieguito Double Track and Platform,
- De Souza Residence (Project 452804), and
- El Camino Real Bridge/Road Widening Project No. 2982.

These planned and proposed projects will increase the potential for adverse cumulative impacts to occur from construction equipment, vehicles, materials, staging yards, and project personnel. However, adverse visual impacts during construction will be short term and temporary. Temporary impacts to scenic vistas or visual character of the Proposed Project area could be potentially cumulative if construction occurs within a viewshed of another project being constructed concurrently; however, because most of the Proposed Project components and a majority of the planned and proposed projects are linear, construction impacts at any given location along the Proposed Project route will be temporary and limited in duration. While the Watermark Del Mar and Ross Residence projects are located within 0.5 mile of each other and the Proposed Project, landscaping, development, and other infrastructure will obstruct views of these development projects simultaneously from potential viewers. None of the remaining projects are within the same viewshed as one another. Further, views from the northern portion of Sorrento Valley Road, which is closed to vehicles, will be improved by the removal of seven poles in the Los Peñasquitos Lagoon. Similarly, views from Carmel Valley Road, as depicted in Attachment 4.1 B: Visual Simulations of the Proposed Project, Key Observation Point 8, will also be improved as a result of the pole removal. Therefore, a beneficial impact will occur, and aesthetic impacts to scenic vistas or visual character are not expected to be cumulatively considerable during construction of the Proposed Project.

There are no state-designated scenic highways within the Proposed Project area; however, the portion of I-5 located within the Proposed Project area is considered eligible for designation as a scenic highway. The I-5/SR-56 Interchange Project will be located along I-5 as well; however, motorists' views of Proposed Project construction activities coupled with views of the I-5/SR-56 Interchange Project will be short in duration due to vehicle speeds and the temporary duration of construction activities at the given locations along the Proposed Project route. As a result, cumulative impacts to views from I-5 will be less than significant.

In addition, construction of the Proposed Project will not create a new source of substantial light or glare that will adversely affect day or nighttime views in the Proposed Project area, because any nighttime construction activities will have temporary lighting directed on site and away from potentially sensitive receptors (e.g., residences). Further, in the area where potential nighttime work activities may be required (e.g., the TL666D removal over I-5), no other planned or proposed projects with potentially overlapping construction timelines will also occur within 0.5 mile. As a result, there will be no cumulative light or glare impacts.

Air Quality

As described in Section 4.3 Air Quality, the Proposed Project is anticipated to have temporary less-than-significant impacts during construction in regards to air quality plan consistency, air quality standards from construction equipment and worker vehicle exhaust, and criteria air pollutant increases. To address the Proposed Project's potential impacts, SDG&E will implement air emissions control measures during construction to reduce emissions and dust, as discussed in Section 4.3 Air Quality. With the implementation of these measures, the uncontrolled and controlled emission rates from the construction phase of the Proposed Project will not exceed the applicable San Diego County Air Pollution Control District (SDAPCD) thresholds.

The construction schedule for the Proposed Project could potentially overlap with the construction schedules for the following three planned and proposed projects listed in Table 4.18-1: Planned and Proposed Projects within One Mile:

- El Camino Real Bridge/Road Widening Project No. 2982,
- I-5/SR-56 Interchange Project, and
- Del Mar City Hall/Town Hall Project.

An additional seven projects have construction timelines that are unknown and could overlap with the Proposed Project. Of the planned and proposed projects listed in Table 4.18-1: Planned and Proposed Projects within One Mile that have potentially overlapping construction timelines with the Proposed Project and for which environmental impact documents are available, none of these projects will have significant air quality impacts nor will they exceed applicable air quality thresholds and conflict with applicable criteria air pollutants. Additionally, the planned and proposed projects will be required to comply with local ordinances and regulations concerning air quality, including dust control, during construction activities. As a result, cumulative impacts to air quality are anticipated to be less than significant.

With the implementation of Project Design Features and Ordinary Construction Restrictions, odor impacts are unlikely due to the nature of the Proposed Project; therefore, the Proposed Project will not contribute to a cumulatively considerable odor impact.

Biological Resources

As described in Section 4.4, Biological Resources, the Proposed Project is anticipated to have temporary, less-than-significant impacts during construction in regards to sensitive species, sensitive natural communities, jurisdictional waters, and wildlife population and movement patterns. Cumulative impacts to biological resources could occur as a result of increased ground-

disturbing activities by multiple projects. These cumulative activities could increase the distribution of normal animal breeding, foraging, and migration behavior, the removal of suitable habitat for multiple special-status plant and wildlife species, and the degradation of jurisdictional water features.

As previously discussed, construction of the Proposed Project and three of the projects listed in Table 4.18-1: Planned and Proposed Projects within One Mile could occur simultaneously. An additional seven projects have construction timelines that are unknown and could overlap with the Proposed Project. Cumulative impacts to biological resources could occur as a result of increased ground-disturbing activities by multiple projects that could disrupt normal animal breeding, foraging, and migration behavior, as well as the potential removal of suitable habitat for multiple special-status plant and animal species, including species that are protected under the federal Endangered Species Act (FESA) and the California Endangered Species Act (CESA), particularly within portions of the Proposed Project. Other planned and proposed projects (e.g., Ross Residence, El Camino Real Bridge/Road Widening Project No. 2982, Estates and Del Mar Subdivision, and Spectrum III and IV) will also have impacts to special-status species and their habitat. While the Proposed Project and other planned and proposed projects will have impacts to sensitive species, all projects within the cumulative scenario will be subject to the same permitting requirements under the FESA and CESA, which are intended to minimize and mitigate for impacts to species, both at the project level and in a regional context. Therefore, cumulative impacts to sensitive species and critical habitat are expected to be less than significant after the required avoidance, minimization, and compensatory mitigation measures are applied.

The Proposed Project has been designed to avoid impacts to jurisdictional wetlands and waters and all proposed structures will be installed outside of the boundaries of jurisdictional wetlands and waters. With the implementation of SDG&E's Subregional NCCP Operational Protocols and Habitat Enhancement Measures and the APMs identified in Section 4.4, Biological Resources, the Proposed Project will not contribute to a cumulative impact to jurisdictional wetlands and waters.

As discussed in Section 4.4, Biological Resources, the Proposed Project is located within a number of wildlife corridors and preserve areas, including the San Dieguito Lagoon, Los Peñasquitos Lagoon, Torrey Pines State Natural Reserve Extension, Multiple Habitat Planning Area, and the Pacific Flyway. The Spectrum III and IV project may have effects on wildlife movements, however, the project site is not designated as a Multiple Species Conservation Program regional wildlife corridor as it does not provide a throughway for wildlife species by connecting with major areas of off-site habitat. With the implementation of the SDG&E Operational Protocols and Habitat Enhancement Measures, as well as APMs, potential impacts to native wildlife movements will be minimized and cumulative impacts to native wildlife movements will be less than significant.

The Proposed Project would not conflict with local policies or conservation plans; therefore, the Proposed Project would not contribute to a cumulatively considerable impact related to local policies and conservation plans.

Cultural Resources

As described in Section 4.5 Cultural Resources, the Proposed Project is anticipated to have temporary, less-than-significant impacts during construction in regards to historic, archaeological, paleontological, and tribal cultural resources, and potential for disturbance to human remains.

The Proposed Project will potentially impact six historic resources, one of which was determined to be eligible for inclusion in the California Register of Historic Resources (CRHR). In addition, the Proposed Project will potentially impact six archaeological sites, four of which may be eligible for CRHR listing. To ensure that historic resources and archaeological sites are not impacted during construction, SDG&E will implement Project Design Features and Ordinary Construction Restrictions, which include construction monitoring by a qualified archaeologist. Cumulative impacts to cultural resources could occur as a result of increased ground-disturbing activities from multiple projects within the Proposed Project area. The following planned and proposed projects are anticipated to have impacts on cultural resources, but these impacts are unlikely to be increased as a result of the Proposed Project:

- El Camino Real Bridge/Road Widening Project No. 2982,
- I-5/SR-56 Interchange Project,
- Ross Residence,
- the Estates at Del Mar Subdivision,
- Saint John Garabed (Project 240283),
- Del Mar City Hall/Town Hall Project, and
- Spectrum III and IV.

While there is potential for cumulative impacts to cultural resources during construction of these projects and the Proposed Project, the planned and proposed project applicants will implement mitigation measures, such as requiring construction monitoring to address potential impacts to buried resources, to further reduce potential impacts. Further, relatively small segments of the Proposed Project will take place in previously undisturbed areas and SDG&E will implement Project Design Features and Ordinary Construction Restrictions to avoid or minimize potential impacts to cultural resources; therefore, the Proposed Project's cumulative contribution will not be significant.

Areas of the Proposed Project are underlain by geologic rock units/formations with high paleontological potential. As such, fossils may be encountered during excavation activities for the Proposed Project, and construction has the potential to impact paleontological resources. The following planned and proposed projects also have potential to impact paleontological resources and could potentially have overlapping construction timelines:

- El Camino Real Bridge/Road Widening Project No. 2982,
- I-5/SR-56 Interchange Project, and
- Saint John Garabed (Project 240283).

Fossils may be encountered during construction of the other planned and proposed projects; however, most projects will occur within existing roadways or within areas that are previously

disturbed or developed, where the likelihood of encountering paleontological resources is low. Further, to minimize any impacts to paleontological resources during construction, SDG&E will implement Project Design Features and Ordinary Construction Restrictions to ensure the proper salvage, relocation, and management of fossils if they are encountered during excavation in areas of high paleontological potential. Additionally, similar strategies will be required for the planned and proposed projects that are underlain by geologic rock units/formations with high paleontological potential in the event of an unanticipated discovery. Therefore, with the implementation of Project Design Features and Ordinary Construction Restrictions, a cumulatively considerable impact to paleontological resources is not anticipated.

Impacts to tribal cultural resources could occur within the Proposed Project area. Early consultation with interested Native American representatives (identified by the Native American Heritage Commission) was initiated on September 6, 2016; and at this time, SDG&E is not aware of any tribal cultural resources in the Proposed Project study area. Tribal consultation will continue throughout all phases of the Proposed Project, as deemed necessary. If any tribal cultural resources are identified in the Proposed Project area, they will be avoided, preserved in place, or handled as determined during consultation. As a result, a cumulatively considerable impact to tribal cultural resources is not anticipated.

Geology and Soils

The potential cumulative impacts that may occur as a result of the Proposed Project, in conjunction with other planned and proposed projects, include threats to human safety and structural integrity, soil erosion or topsoil loss, geologic unit instability, or construction on expansive soils. All of the projects could potentially impact soils, and particularly the following projects based on a review of available environmental review documents:

- San Dieguito Double Track and Platform,
- Ross Residence, and
- the Estates at Del Mar Subdivision.

However, the potential for soil erosion and sedimentation will be minimized through the implementation of a Storm Water Pollution Prevention Plan (SWPPP) and best management practices (BMPs), which are required for all projects that disturb one or more acres of soil. All of the projects will be designed to meet current building code and safety standards and will be required to adhere to regulations that limit developments on steep slopes and in landslide areas, thereby ensuring that the potential for long-term cumulative impacts is less than significant. As a result, the potential for a significant cumulative impact to geology and soils is low and is not expected to be significant.

Greenhouse Gas Emissions

As previously discussed, construction of the Proposed Project and three of the projects listed in Table 4.18-1: Planned and Proposed Projects within One Mile could occur simultaneously. An additional seven projects have construction timelines that are unknown and could overlap with the Proposed Project. GHG analyses and thresholds are cumulative by nature, so if a project is less than significant under applicable thresholds of significance, the project does not contribute to cumulatively significant GHG impacts. Emissions generated during the construction of the

Proposed Project will not exceed applicable thresholds recommended by the South Coast Air Quality Management District and the County of San Diego. SDG&E is required to adhere to the standards and requirements established by the California Air Resources Board and the SDAPCD to minimize the potential for the Proposed Project's construction activities and mobile equipment to contribute to potential cumulative impacts with regards to GHG emissions. As such, cumulative GHG impacts will be less than significant.

Hazards and Hazardous Materials

Cumulative impacts to hazards and/or hazardous materials can result from the construction of concurrent projects and the Proposed Project having an increased effect on public or worker safety, including exposure to hazardous materials, physical hazards, or increased fire potential. SDG&E will comply with all applicable laws, rules, and regulations. Construction of the Proposed Project will require only small amounts of hazardous materials, and the transport of these materials will primarily occur during the approximately 12-month construction period. Planned and proposed projects with overlapping construction timelines could have a temporary impact from accidental releases of diesel and gasoline fuel, hydraulic fluids, and other hazardous liquids from construction equipment. While there is potential for accidental spills and leaks during construction, it is very unlikely that another spill will occur in the immediate vicinity during a similar timeframe. With the adherence to federal and state regulations, large releases of hazardous materials from multiple projects are highly unlikely. Small releases will be contained, cleaned up, and disposed of in accordance with applicable laws. As a result, cumulative impacts are expected to be less than significant.

The majority of the Proposed Project is located within the California Department of Forestry and Fire Protection (CAL FIRE) Fire Resource and Assessment Program's (FRAP's) Very High Threat to People and High Threat to People classes. Construction could result in a fire due to the increased presence of vehicles, equipment, and human activity in areas of elevated fire hazard severity. Cumulative impacts regarding wildland fire risk could result from other planned and proposed projects being located within high fire hazard areas and performing construction activities concurrently. While the project's construction activities could result in a fire due to the increased presence of vehicles, equipment, and human activity in areas of elevated fire hazard severity, and cumulative impacts regarding wildland fire risk could result from other planned and proposed projects located within high fire hazard areas, fires caused by these activities are unlikely with the implementation of required measures.

Of the planned and proposed projects listed in Table 4.18-1: Planned and Proposed Projects within One Mile, the following five projects have a construction timeline that may overlap and are also located within the CAL FIRE Very High or High Fire Threat to People classes:

- De Souza Residence (Project 452804),
- Ross Residence,
- Watermark Del Mar,
- Del Mar City Hall/Town Hall Project, and
- Spectrum III and IV.

The Del Mar City Hall/Town Hall and Spectrum III and IV projects will have no anticipated impacts according to the Final Environmental Impact Report (EIR) and MND, respectively. The Ross Residence project will have a less-than-significant impact with the implementation of compliance measures, design features, and a comprehensive Brush Management Plan, according to the project's MND. SDG&E will assess work areas for wildland fire risk, reducing the number of hazards inside and around the perimeter of each work area. While environmental impact documents were not available for the De Souza Residence (Project 452804) and Watermark Del Mar projects, it is assumed that the other planned and proposed projects categorized within the Very High Threat to People and High Threat to People classes will implement similar measures to reduce the risk of wildland fire hazards. As a result, the Proposed Project's cumulative contribution to expose people or structures to a risk of loss, injury, or death related to wildland fires will be less than significant.

Hydrology and Water Quality

A cumulative impact could result from multiple projects depleting groundwater supplies or involving a significant amount of grading, which could alter natural drainage patterns, contribute to increases in runoff, or result in a degradation of water quality. There will be no cumulative impacts to groundwater depletion because water used for dust control during construction of the Proposed Project will be obtained from a municipal source and will not affect local groundwater supplies.

As previously discussed, construction of the Proposed Project and three of the projects listed in Table 4.18-1: Planned and Proposed Projects within One Mile could occur simultaneously. An additional seven projects have construction timelines that are unknown and could overlap with the Proposed Project. Other planned and proposed projects with potentially overlapping construction timelines are expected to affect hydrology and water quality, including the following with environmental impact documents available that identify potential hydrology and water quality impacts:

- El Camino Real Bridge/Road Widening Project No. 2982,
- Ross Residence, and
- The Estates at Del Mar Subdivision.

Potential temporary cumulative impacts on water quality could occur as a result of construction of the Proposed Project in conjunction with other planned and proposed projects, because the majority of the projects involve soil disturbance from grading, clearing, and excavation activities. These activities could cause erosion and sedimentation, and thus degrade water quality. However, the potential for soil erosion and sedimentation will be minimized through the implementation of SWPPPs, which are required for all projects that disturb one or more acres of soil. Further, while minor alterations to drainage patterns could occur during construction of the Proposed Project, all areas disturbed during grading will be restored to their original contours, and the surrounding area will be restored and repaired, as appropriate. With the implementation of the SWPPP and BMPs, the cumulative impact to hydrology and water quality is expected to be less than significant.

Noise

The simultaneous construction of the Proposed Project and the planned and proposed projects has the potential to result in cumulative impacts to noise. As previously discussed, construction of the Proposed Project and three of the projects listed in Table 4.18-1: Planned and Proposed Projects within One Mile could occur simultaneously. An additional seven projects have construction timelines that are unknown and could overlap with the Proposed Project. However, none of them are located adjacent to the Proposed Project. Other projects (e.g., Ross Residence, the Estates at Del Mar Subdivision, and Del Mar City Hall/Town Hall Project) will also generate noise during construction, and a temporary cumulative increase in noise could result when construction of these and other projects occur simultaneously with construction of the Proposed Project. The Ross Residence project will be located approximately 0.17 mile from the Proposed Project, and construction-related, short-term noise levels will be higher than existing ambient noise levels in the vicinity of this project, as discussed in the MND for the project; however, construction activities will be required to comply with the City of Del Mar's construction noise requirements. The Estates at Del Mar Subdivision and Del Mar City Hall/Town Hall projects are more than 0.5 mile from the Proposed Project, so their potential for a cumulative impact is very low.

Construction of the planned and proposed projects will generally be limited to the timeframes established by the local ordinances. Construction of the Proposed Project will also adhere to the adopted times when construction is allowed, and in cases where local ordinances may be exceeded, variances from the standards will be pursued. Further, due to the linear nature of the Proposed Project, contribution to noise impacts due to construction of the Proposed Project at any one location will be limited in duration, and impacts will be temporary.

Public Services

Cumulative impacts to public services could occur as a result of multiple emergencies occurring at several construction sites. As previously discussed, construction of the Proposed Project and three of the projects listed in Table 4.18-1: Planned and Proposed Projects within One Mile could occur simultaneously. In addition, seven projects have construction timelines that are unknown and could overlap with the Proposed Project. Construction of multiple projects at once in proximity to the public facilities identified within one mile of the Proposed Project could adversely affect the performance of the facilities. However, the probability of a single emergency incident is low, and the probability of simultaneous emergencies at multiple construction sites will be even lower.

Cumulative impacts to public services could also result from adverse impacts to public services (e.g., fire and police protection, hospitals, schools, parks, and other public facilities) as a result of lane closures and increased traffic in local roadways where these facilities are located. These impacts that result from transportation and traffic during construction of the Proposed Project are discussed further in the Transportation and Traffic section. The Proposed Project is located within 0.5 mile of Del Mar Fire Department's Fire Station 1 and Sharp Rees Stealy Del Mar Hospital, and is within 0.5 mile of seven schools. None of the planned and proposed projects will be within 0.5 mile of the Sharp Rees Stealy Del Mar Hospital or the five schools. The Watermark Del Mar project will be located 0.11 mile from the Del Mar Fire Department Fire Station 1. A draft EIR for the Watermark Del Mar project has not been prepared at the time of

this analysis, and the anticipated construction timeline is unknown; however, if the construction timeline for the Proposed Project and the Watermark Del Mar project occur simultaneously, both developments will be required to obtain encroachment permits. Further, ingress and egress to Del Mar Fire Department Station 1 will not be impacted as a result of the Proposed Project. As a result, a cumulative impact is not expected to occur.

Recreation

Cumulative impacts on recreation could result from impacts or changes to recreational facilities during construction of the project in conjunction with other planned and proposed projects. The following 11 recreational parks/facilities identified in the vicinity of the Proposed Project are crossed by or are directly adjacent to the Proposed Project's right-of-way:

- San Dieguito River Park, which also includes Crest Canyon Open Space Park, San Dieguito Lagoon, and San Dieguito Lagoon Ecological Reserve;
- Torrey Pines State Natural Reserve, which also includes Los Peñasquitos Lagoon and Torrey Pines State Beach;
- Del Mar Horsepark;
- Sorrento Valley Pedestrian/Multi-Use Path;
- Del Mar Golf Center; and
- Surf & Turf RV Park.

However, the incorporation of applicant-proposed measures (APMs) will reduce construction impacts to recreational facilities to a less-than-significant level. As previously discussed, the construction schedule for the Proposed Project could overlap with the construction schedules for three of the planned and proposed projects listed in Table 4.18-1: Planned and Proposed Projects within One Mile. In addition, seven projects have construction timelines that are unknown and could overlap with the Proposed Project. The Ross Residence and the Estates at Del Mar Subdivision projects are the only ones expected to affect recreation. Both projects propose a limited increase residential units; however, neither of the projects are anticipated to affect the availability of and/or need for new or expanded recreational resources.

During construction, none of the planned and proposed projects will affect any of the identified recreational facilities adjacent to or crossed by the Proposed Project. Therefore, the Proposed Project's cumulative impacts to recreation are anticipated to be temporary and less than significant.

Transportation and Traffic

Simultaneous construction of the Proposed Project and the planned and proposed projects could cause cumulative impacts to traffic. The Proposed Project will have short-term, temporary effects on traffic due to potential lane closures and construction requiring the implementation of traffic controls. During construction, traffic impacts will occur from all projects in the area with overlapping construction timeframes, and there is a possibility that construction activities could result in cumulative impacts. As previously discussed, construction of the Proposed Project and three of the projects listed in Table 4.18-1: Planned and Proposed Projects within One Mile could occur simultaneously. In addition, seven projects have construction timelines that are unknown and could overlap with the Proposed Project. Of the projects listed in Table 4.18-1: Planned and

Proposed Projects within One Mile with potentially overlapping construction timelines, the following projects are the closest to the Proposed Project and may result in cumulative traffic impacts:

- El Camino Real Bridge/Road Widening Project No. 2982,
- I-5/SR-56 Interchange Project,
- San Dieguito Double Track and Platform, and
- Watermark Del Mar.

Traffic could be increased in the surrounding area during concurrent construction of these projects. All developments will be required to obtain encroachment permits, and planned traffic control measures for each will be reviewed by the permitting jurisdiction. Coordination of the traffic detailed in the plans is expected to reduce temporary cumulative impacts to a less-than-significant level.

The Proposed Project will have no impact to circulation plans or policy conflicts or air traffic patterns; therefore, the Proposed Project will not contribute to a cumulatively considerable impact related to circulation plans or policy conflicts or air traffic patterns.

Utilities and Service Systems

The Proposed Project is anticipated to have temporary, less-than-significant impacts during construction in regards to wastewater treatment exceedances, water supply availability, and landfill capacity. Cumulative impacts to utilities or service systems have the potential to occur if multiple projects have a combined impact on local utility services or infrastructure.

The Proposed Project will not generate wastewater during construction; however, in the event that groundwater is encountered, dewatering may be necessary. The water will be analyzed and treated, as necessary; discharged or disposed of in accordance with applicable federal, state, and local requirements; and it will not contribute to a cumulative impact.

The Proposed Project will utilize minimal amounts of water during construction activities to control dust on non-paved portions of the Proposed Project area. In total, approximately 707,000 gallons of water are estimated to be required. Construction of the Proposed Project will potentially overlap with three of the projects listed in Table 4.18-1: Planned and Proposed Projects within One Mile. Seven additional projects could also overlap with Proposed Project construction, as their construction timelines are unknown. If these projects are constructed within the same timeframe, they could produce a temporary, cumulative impact to water purveyors. However, all of the applicants for the planned and proposed projects will need to coordinate with water providers prior to construction to ensure that the providers can accommodate the demand. Because the Proposed Project's relatively low water demand will be temporary and short term, the impact on a water purveyor's long-term water supply will be insignificant. Therefore, the Proposed Project's contribution to a cumulative impact to water supply will be less than significant.

Local area landfills could be impacted due to the increased cumulative need for disposal of construction debris. The Proposed Project will generate limited quantities of construction waste

(i.e., refuse, spoils, trash, poles, etc.) that will ultimately be transported to the Miramar Landfill and disposed of properly in accordance with all applicable federal, state, and local laws regarding solid and hazardous waste disposal. The amount of daily construction waste for the projects listed in Table 4.18-1: Planned and Proposed Projects within One Mile is unknown; however, construction debris will be generated by these projects as well. The Miramar Landfill accommodates approximately 910,000 tons of waste per year, has the capacity to accept a total of approximately 15.5 million cubic yards of additional waste, and is expected to reach capacity by the year 2022. Solid waste generated by the Proposed Project and other projects will decrease the capacity of the Miramar Landfill; however, the amount will not be enough to significantly affect the capacity. Any impacts on landfills caused by the construction and operation of the planned and proposed projects will also be required to conform to the regulations and policies of the local jurisdictions. As a result, the cumulative impact will be less than significant.

Construction of the Proposed Project will have no impact to existing municipal water or wastewater treatment systems, storm water drainage facilities, or wastewater treatment capacity, and the Proposed Project will not violate any solid waste statutes or regulations; therefore, the Proposed Project will not contribute to a cumulatively considerable impact.

4.18.8 Conclusion

Due to the level of development in the vicinity of the Proposed Project, the Proposed Project will contribute to certain cumulative impacts during construction, but its contribution to these impacts will be minimal. Based on the removal of existing overhead facilities and the installation of Proposed Project components in areas already covered by existing O&M activities, post-construction O&M requirements in the Proposed Project area will be reduced and the Proposed Project will not contribute to cumulative impacts during O&M. There will be a beneficial reduction in O&M activities. Further, a beneficial impact to aesthetics will occur as a result of pole removal in scenic corridors. It is anticipated that implementation of mitigation measures for the planned and proposed projects in the vicinity of the Proposed Project will be required, in addition to avoidance and minimization measures similar to SDG&E's APMs and permit conditions. These measures will minimize potential environmental impacts, thereby minimizing the overall cumulative effects. As a result, cumulative impacts are expected to be less than significant.

4.18.9 References

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