

5.19 Mandatory Findings of Significance

5.19.1 Cumulative Impacts

This section discusses mandatory findings of significance, as well as potential cumulative and growth-inducing impacts related to the TL674A Reconfiguration and TL666D Removal Project. CEQA Guidelines Section 15065 requires lead agencies to make certain mandatory findings in determining whether a proposed project would result in significant impacts on the environment. The criteria for making these findings are presented in Table 5.19-2.

Defining Cumulative Impacts

CEQA Guidelines Section 15355 defines a cumulative impact as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” All environmental topics included in this Initial Study (reflected in Sections 5.1 Aesthetics through ~~5.17~~ 5.18 Utilities and Service Systems) are evaluated to determine whether the project would have the potential to cause cumulative effects. In making such a determination, CEQA directs lead agencies to consider first whether “the cumulative impact is significant” and then whether “the project’s incremental effect, though individually limited, [would be] ‘cumulatively considerable.’” (Guidelines Section 15064(h)(1)) The Guidelines note that other reasonably foreseeable projects alone “shall not constitute substantial evidence that the proposed project’s incremental effects are cumulatively considerable.”

Timeframe of Cumulative Analysis

The timeframe of the cumulative analysis relates to when and for how long potential cumulative impacts may occur. Project impacts may be classified as causing short- or long-term environmental effects. Short-term effects would be those that may potentially occur during construction work associated with reconfiguring TL647A, removing TL666D from service, ~~and~~ converting portions of existing overhead 12 kV distribution to underground configuration, and removing and replacing the circuit breaker at the Del Mar Substation. SDG&E anticipates project construction commencing in 2019, extending over an approximately 12-month period, with completion estimated in 2020. Construction could occur up to six days per week, Monday through Saturday during normal work hours, pending jurisdictional requirements.

Long-term impacts would be those associated with operation and maintenance of the local electrical distribution grid and would potentially occur after project construction is complete. SDG&E anticipates that removing 6 miles of overhead TL666D line currently exposed to the elements would in the future avoid the need to access the environmentally sensitive San Dieguito and Peñasquitos Lagoons for repair work. In the main and taken together, SDG&E anticipates the project would improve system reliability overall comparative to existing conditions and the proposed project’s long-term operational and maintenance effects would be of lesser frequency, magnitude and intensity than of those of the current (baseline) circuitry configuration.

This Initial Study finds no significant project-level long-term (O&M) impacts for any environmental topics. Moreover, there are also no known future projects that would generate similar impacts, with which the proposed project’s could combine. The proposed project’s long-term operational effects would neither

1 cause cumulative impacts nor represent considerable contributions to such effects. The evaluation of the
2 proposed project’s cumulative impacts therefore involves evaluating short-term (construction) impacts in
3 combination with the possible impacts of reasonably foreseeable probable future projects, which is the
4 subject of the analysis in response to item 19 (b), below.
5

6 **Approach and Geographic Scope**

7 The CEQA Guidelines outline two methods to identify reasonably foreseeable projects for analyzing
8 cumulative effects, which are referred to as list and projections-based approaches. The list-based
9 approach consists of compiling a list of “past, present and probable future projects producing related or
10 cumulative impacts, including, if necessary, projects outside the control of the agency.” (CEQA
11 Guidelines Section 15130(b)(1)(A)) The projections-based approach entails preparing a summary of
12 projections contained in an adopted local, regional or statewide plan, such as a General Plan, or related
13 planning document like regional forecasting and planning documents, that describes or evaluates
14 conditions contributing to the cumulative effect (CEQA Guidelines Section 15130(b)(1)(B)). Lead
15 agencies may use either— or a combination of both— approaches depending on what best suits the
16 topical evaluation.
17

18 Cumulative impacts would be the potential impacts from past, present and reasonably foreseeable projects
19 that could combine with similar impacts caused by the proposed project. As reported in Sections 5.1
20 through 5.18 of this Initial Study, potential project impacts would be those resulting from construction of
21 the various project components. Construction impacts would be temporary and highly localized, and
22 concentrated around work sites, laydown yards and places where project construction work would occur
23 or machinery would operate. With the exception of work anticipated at the Del Mar Substation,
24 ~~C~~onstruction work would advance along the corridors as crews would remove or add poles, excavate
25 trenches, install ducts and complete the work of undergrounding and reconfiguring the electrical lines.
26 The study area’s size is spatially sufficient for identifying foreseeable projects and evaluating of
27 cumulative effects. Potential impacts would be localized and would be generated by construction
28 activities at points along the corridors where work would occur. Air quality and GHG emissions are by
29 their nature considered in a cumulative context given that gases, once emitted from a source into the
30 atmosphere, would eventually disperse well beyond any arbitrary boundaries designating a study area.
31

32 **Reasonably Foreseeable Future Projects**

33 Table 5.19-1 lists the foreseeable projects considered in conjunction with the proposed project in the
34 analysis of cumulative impacts. Information related to these projects is derived from the applicant’s
35 Preliminary Environmental Assessment, map viewers and project information on web pages hosted by:
36

- 37 • City of San Diego Planning Department;
- 38 • City of Del Mar Planning and Community Development; and,
- 39 • California Department of Transportation.
40

Table 5.19-1 Reasonably Foreseeable Projects

	Project Description	Location	Distance	Status
I	Water Group 939 Replacement Project Replacement of water mains along Flinkote Ave., crossing Carmel Mountain Rd. and Sorrento Valley Rd.	Various City of San Diego	0.05	Construction underway, est. completion 2019.
	Via De La Valle Underground Utility District Installation of street lights within Via De La Valle as part of utilities undergrounding program.	Along Via De La Valle, City of San Diego	adjacent	Design phase, est. complete 2020.
	Water Main Capital Improvement Project Replacement of approx. 4,960 linear ft. of water mains in the Torrey Pines community planning area.	Sorrento Valley Rd., Industrial Ct., Tripp Ct., City of San Diego	0.06	Construction underway, est. completion 2018.
	Pipeline Rehabilitation AF1 Trenchless rehabilitation of approximately 7 miles of existing 8-in. deteriorated sewer mains within roadways between Del Mar Heights Rd. and Carmel Valley Rd.	Crosses various roadways, City of San Diego	0.24	Construction underway, est. completion 2018.
	El Camino Real Bridge/Road Widening Project Road modifications and bridge replacement along a segment of El Camino Real between Via De La Valle and San Dieguito Rd.	El Camino Real from Via De La Valle to San Dieguito Rd., City of San Diego	0.46	Approved est. 2019-2021
	New One Paseo Development of a neighborhood village in Del Mar Heights on a vacant, approx. 23.6-acre lot, including 608 housing units, 280,000 sq. ft. of office space, and 95,000 sq. ft. of commercial retail.	Southwest corner, Del Mar Heights Rd./ El Camino Real, City of Del Mar	0.50	Construction underway, est. completion 2019.
II	Los Peñasquitos Lagoon Bridge Replacement Part of LOSSAN rail corridor, replacement of four aging wooden trestle rail bridges in Los Peñasquitos Lagoon with modern concrete bridges.	Los Peñasquitos Lagoon, City of San Diego	adjacent	Construction complete, 2018.
	Del Mar City Hall/Town Hall Project Redevelopment of existing City Hall site with new civic buildings and amenities.	1050 Camino Del Mar, City of Del Mar	0.60	Construction complete, 2018.
	Sewer and Water Capital Improvement Project Open trench construction of approx. 5,175 linear ft. of sewer line, point repairs of existing sewer mains, trenchless rehab of 2,297 linear ft. of sewer main, construction of 205 linear ft. of 6-inch water main, and decommissioning of 7th Street pump station.	City of Del Mar	0.85	Construction complete, 2017.
	I-5/Genesee Avenue Interchange Project Replacement of existing 6-lane Genesee Avenue overpass with a 10-lane bridge.	Along I-5 from Sorrento Valley Rd. to Voigt Dr., City of San Diego	0.95	Construction complete, 2015.

Table 5.19-1 Reasonably Foreseeable Projects

	Project Description	Location	Distance	Status
III	Watermark Del Mar Multi-family residential development comprising 12 structures, 48 dwellings and parking structure with vehicular access from San Dieguito Rd.	Jimmy Durante Blvd., San Dieguito Rd., City of Del Mar	adjacent	Approved 2018, construction period N/A
	Saint John Garabed Project Construction of a 350-seat church, 500-seat multipurpose hall, education building, and gymnasium.	13925 El Camino Real, City of San Diego	0.65	Approved 2015 construction schedule unknown. Permits expire 2021.
	The Estates at Del Mar Subdivision Subdivision of property into 5 single-family residential lots west of Camino del Mar.	929 Border Ave., City of Del Mar	0.71	Approved; construction, schedule unknown.
	Del Mar Village Mixed-Use Project Specific plan to develop two parcels totaling 25,527 sq. ft. for a 19,650-sq. ft. multi-building mixed-use project with 38 office condos/work lofts, 3 retail condominiums, 2 restaurant sites and underground parking on 3 levels (approx. 106 spaces). Prior site uses included gas station and two-story commercial building.	941 Camino Real, City of Del Mar	0.9 mi from Torrey Pines Extension work area	Approved 2018, construction, schedule unknown.
IV	San Dieguito Track and Trestle Replacement Replacement of a 100-year-old wooden trestle across San Dieguito Lagoon and 1.1 miles of double track within the Los Angeles-San Diego-San Luis Obispo rail corridor (LOSSAN) in the cities of Solana Beach and Del Mar.	San Dieguito Lagoon, City of Del Mar	adjacent	Unfunded. Construction anticipated 2030?
	I-5 / SR-56 Interchange Project Roadway improvements on I-5 between Del Mar Heights Rd. and Carmel Valley Rd., and on SR-56 between I-5 and Carmel Country Rd.	I-5/SR-56 Intersection, City of San Diego	0.20	approved; unfunded est. completion 2025-2035

Sources: SDG&E 2017; City of San Diego, 2018, City of Del Mar 2018.

Notes:

- I The six projects in group I are currently under construction or construction is imminent.
- II The four projects in group II are those for which construction work has been completed.
- III The four projects in group III are those that have been approved and the construction schedule is unknown.
- IV The two projects in group IV are those that have been approved but are not funded and have an estimated completion date of 2025 or later.

1
2 As illustrated in Table 5.19-1, 16 reasonably foreseeable projects are identified within the project study
3 area. Of these, six are currently under construction or construction as of late 2019 is imminent; four
4 projects have recently been completed; another four projects have been approved but construction has not
5 yet begun and construction schedule information is not available; and two projects have been approved
6 but are not funded and have an estimated completion date of 2025 or later.

7
8 **5.19.2 Environmental Impacts and Assessment**

9
10 Table 5.19-2 includes the three questions from Appendix G of the CEQA Guidelines that relate to making
11 mandatory findings of significance for the proposed project.

Table 5.19-2 Mandatory Findings of Significance Criteria

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially 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, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

1
2 **a. Does the project have the potential to substantially degrade the quality of the environment,**
3 **substantially reduce the habitat of a fish or wildlife population to drop below self-sustaining levels,**
4 **threaten to eliminate a plant or animal community, substantially reduce the number or restrict the**
5 **range of a rare or endangered plant or animal or eliminate important examples of the major**
6 **periods of California history or prehistory?**
7

8 **Biological Resources**

9 Overall, the proposed project would result in the installation of structures within existing roads in right-
10 of-way that does not provide substantial habitat resources, and the removal of existing manmade
11 structures from within multiple high-quality habitat areas, including San Dieguito Lagoon, Los
12 Peñasquitos Lagoon, and Torrey Pines State Natural Reserve Extension as well as limited work at the Del
13 Mar Substation site. With the exception of the substation, the aforementioned ~~these~~ areas contain
14 substantial habitat resources including ESHAs and sensitive natural communities that may be identified as
15 ESHAs, such as Torrey Pine Forest, Diegan Coastal Sage Scrub, various chaparral communities, and
16 various marsh, riparian, and wetland communities (see Section 4, "Biological Resources," Tables 5.4-5
17 and 5.4-12). These sensitive natural communities, as well as other native natural communities within the
18 project vicinity that are not sensitive, provide extensive habitat for special status plant and wildlife
19 species.
20

21 Biologists observed 17 special status plant species (see Table 5.4-3) and 24 special status wildlife species
22 (see Table 5.4-4) in preliminary project area surveys. Biologists also identified additional special status
23 species that were not directly observed during project area surveys, but are highly likely to occur within
24 the project vicinity based on habitat analyses and historic observations. Project-related impacts to any

1 special status species, including impacts to sensitive and non-sensitive natural communities that provide
2 habitat resources for such species, would be significant. Because many project-related activities would be
3 occurring both adjacent to and within locations identified as Important Bird Areas of Global Priority for
4 both resident and migratory avian species, potential impacts to bird species, as well as potential impacts to
5 non-avian special status species and their habitat resources, could be significant.

6
7 SDG&E would implement multiple APMs, BMPs, and other protocols as described in its Subregional
8 NCCP that would minimize such impacts. Through incorporation of **APM-BIO-09**, which requires bat
9 surveys and avoidance of activities that could disturb bats, potential impacts to bat species would be less
10 than significant. However, because other potential impacts would remain significant even with
11 incorporation of SDG&E's other proposed measures, the applicant would also implement mitigation
12 measures to reduce potential impacts to plant and wildlife species, including habitat-related impacts, to
13 less-than-significant levels.

14
15 **MM BR-1** requires that the applicant conduct preconstruction surveys for sensitive biological resources
16 30 days prior to the start of construction within qualifying work areas, with a subsequent work area
17 biological survey if construction halts for at least 14 days in a given work area prior to recommencing in
18 that same work area. It also requires daily pre-construction biological clearance sweeps within work areas
19 containing suitable habitat for special status species. **MM BR-2** requires that the applicant designate
20 locations containing sensitive biological features including sensitive natural communities, aquatic
21 features, ESHAs, and special status species within or near work areas to ensure that construction activities
22 would not intentionally degrade such resources. **MM BR-3** requires that all workers attend a Worker
23 Environmental Awareness Program (WEAP) that would help crewmembers recognize and/or identify
24 potentially sensitive biological resources in work areas. **MM BR-4** would require biological monitoring
25 during construction activities in areas with the potential to support special status species, and within 50
26 feet of Environmentally Sensitive Areas. **MM BR-5** requires SDG&E to develop a Natural Community,
27 Tree, and Plant Protection Plan to ensure that sensitive natural communities, trees, and other plant species
28 are avoided if feasible, and restored appropriately if avoidance is infeasible. **MM BR-6** prohibits
29 construction within 100 feet of San Dieguito Lagoon, Los Peñasquitos Lagoon, and Torrey Pines State
30 Natural Reserve Extension during Nesting Bird Season (February 1-August 31) in accordance with
31 SDG&E's proposed construction schedule. It additionally requires focused avian preconstruction surveys
32 in areas containing suitable habitat for special status avian species. Survey results may determine a need
33 for construction buffers up to 500 feet from lagoon areas, based on species need. **MM BR-7** would
34 minimize short-term habitat interference by ensuring that nighttime lighting is not directed into habitat
35 areas. Finally, **MM BR-8** prohibits interference with habitat and nectar resources used by two butterfly
36 species requiring special protection.

37
38 With SDG&E's APMs, BMPs, and additional protocols, as well as the MMs described above, impacts to
39 plant and wildlife species by means of both direct species impacts and indirect habitat degradation
40 impacts would be reduced to less than significant. Because there would not be any permanent impacts to
41 sensitive natural communities or habitat areas, impacts would be temporary and restricted to the
42 construction phase. Therefore, the proposed project would not substantially restrict the range of any
43 species known to utilize the project vicinity.

1 **Cultural Resources**

2 Project construction activities, such as those associated with excavation and earthmoving that would be
3 required for hand holes and duct banks that would facilitate undergrounding of electrical circuits could
4 potentially affect cultural and archeological resources through material impairment of artifacts. Potential
5 damage or destruction of cultural, archeological or paleontological resources could preclude eligibility for
6 listing on the California Register of Historical Resources if certain measures were not implemented to
7 address potential adverse impacts during construction. The applicant would implement **MM CUL-1** to
8 establish buffers around known archeological sites that would be demarcated by fencing that would
9 restrict machinery and heavy equipment in areas thereby avoiding potential damage to subsurface
10 resources. **MM CUL-2** would assign a qualified monitor to the site who would oversee construction work
11 and evaluate and curate finds, if any, in the field. **MM CUL-3** requires the applicant implement cultural
12 resources training to educate contractors working in the field about identifying potential resources and the
13 procedures to follow should a potential resource be discovered. **MM CUL-4** establishes that a qualified
14 archeologist shall be contacted in the event that a resource is discovered. The qualified archeologist would
15 evaluate the discovery using CRHR and NRHP criteria and confer with the CPUC on the status of the
16 find.

17
18 The proposed project, with implementation of the mitigation measures referenced above would not
19 eliminate important examples of the major periods of California history or prehistory.

20
21 **Significance: Less than Significant with Mitigation Incorporation.**

22
23 *b. Does the project have impacts that are individually limited, but cumulatively considerable?*

24
25 The analysis of cumulative effects focuses primarily on the proposed project's construction activities
26 relating to the reconfiguration of TL647A, removal of TL666D from service, and the conversion of
27 portions of existing 12 kV distribution lines from an overhead to underground configuration and circuit
28 breaker removal and replacement work at the Del Mar Substation. The analysis considers whether the
29 project's cumulative impacts could combine with similar impacts from reasonably foreseeable projects in
30 the study area; whether this potential combination of impacts would affect any of the environmental
31 topics evaluated in Sections 5.1 through 5.18 of this Initial Study ~~would result in cumulative impacts~~; and,
32 finally, whether project contributions to any cumulative impacts would be cumulatively considerable
33 (significant). As previously discussed, the proposed project's O&M activities would not cause or
34 contribute considerably to cumulative impacts and are therefore not addressed further in this analysis.

35
36 The proposed project would have no impact in the following resource areas: agriculture and forestry
37 resources (the project would not convert prime farmland to nonagricultural use or preclude agricultural
38 use where it may be permitted.); land use and planning (the project would neither disrupt nor divide
39 existing communities or conflict with plans or policies adopted for the purpose of mitigating
40 environmental effects); mineral resources (the project would not affect known mineral resources of value
41 to the region); population and housing (the project would neither displace population or housing, nor
42 would it require the construction of replacement housing); or tribal cultural resources. Therefore, the
43 project would not combine with impacts of reasonably foreseeable projects to result in cumulative
44 impacts related to these environmental topics. Further analysis of the above topics is not required.

1 Cumulative impacts resulting from construction of the proposed project could possibly occur in
2 conjunction with the other reasonably foreseeable probable future projects. The analysis evaluates the
3 project's potential to result in cumulative impacts in the following environmental subject areas:

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils
- GHG Emissions
- Hazards/Hazardous Materials
- Hydrology and Water Quality
- Noise
- Public Services
- Recreation
- Transportation and Traffic
- Utilities and Service Systems

4
5 **Impacts**

6 Aesthetics

7 Aesthetic and visual resource effects are project-specific and highly localized; therefore, a list approach is
8 used to evaluate potential cumulative impacts. The geographic scope of cumulative aesthetic impacts
9 includes those areas where one or more foreseeable projects would be visible in conjunction with the
10 proposed project from a public viewpoint. If shared view corridors are identified, the analysis must then
11 determine whether the project's contribution would be "considerable" based on the project's potential to
12 adversely affect scenic views and vistas; substantially degrade of the area's visual quality; damage scenic
13 resources within a state scenic highway; or contribute to substantial light and glare.

14
15 Project construction work would be visible from certain key observation points along public streets and
16 from workspaces that are in scenic areas. Views would include those of stringing sites, staging areas and
17 fly yards, and of other areas where project construction work would occur in fore- and mid-ground views.
18 Background, long-range views would continue to frame landscape features such as the Pacific Ocean,
19 coastal bluffs, beaches, ridges, canyons, marshes, lagoons, mountains, hilltop parks and open spaces,
20 features that local planning documents identify as *scenic*. Views of equipment and materials, trucks,
21 helicopters, and personnel would be available for periods of days to several months depending on the
22 duration of construction at a given location. Of the reasonably foreseeable projects listed in Table 5.19-1,
23 two are located near the proposed project and may have construction schedules that potentially overlap
24 with the proposed project:

- 25 • Watermark Del Mar
- 26 • El Camino Real Bridge/Road Widening Project

27
28
29 Structures and other infrastructure would obstruct views of these reasonably foreseeable projects
30 simultaneously from public viewpoints. None of the remaining foreseeable projects would share the same
31 viewshed with each other or with the proposed project. Further, views from the northern portion of
32 Sorrento Valley Road, which is closed to vehicles, would be improved by the removal of seven poles in
33 Los Peñasquitos Lagoon, which could constitute a beneficial, rather than adverse effect of the project on
34 public vistas. Similarly, views from Carmel Valley Road would also become more natural in character
35 resulting from the removal of utility poles. Therefore, the project's effect on scenic views and vistas
36 would not be cumulatively considerable. A portion of I-5 located within the project area is considered

1 eligible for designation as a state scenic highway. As noted in ~~Section~~ Chapter 4.0, "Project Description,"
2 the proposed project would include removal of an overhead power line that crosses the I-5. There are no
3 probable future projects in the I-5 viewshed that would combine with the proposed project to exacerbate
4 visual quality impacts. Removing this feature from the corridor would not constitute a cumulatively
5 considerable impact nor preclude the corridor from being designated as scenic.

6
7 Construction of the proposed project would primarily occur during daytime construction hours, as
8 directed by local ordinances within the cities of San Diego and Del Mar. Some construction work such as
9 the removal of the TL666D conductor over I-5 may occur at night. The Initial Study identifies **MM BR-7**
10 that restricts nighttime lighting to minimal levels required by OSHA for worker safety and calls for
11 lighting to be focused on the specific work area and directed away from sensitive receptors and wildlife
12 corridors. If construction work were to occur at night, it could be surrounded by various other sources of
13 light, including possibly construction of other projects shown in Table 5.19-1, though none specify the
14 possibility of nighttime construction occurring. Given that nighttime construction work would be highly
15 localized, with light sources directed at specific work areas as required by **MM BR-7**, nighttime lighting,
16 even if other sources of lighting were nearby, would not be anticipated to contribute to cumulatively
17 considerable light and glare impacts. Therefore, the proposed project's aesthetic impacts would not be
18 cumulatively considerable.

19
20 Air Quality

21 The geographic scope for determining cumulative air quality impacts is the San Diego Air Basin (SDAB).
22 The San Diego Air Pollution Control District (SDAPCD) has adopted several attainment plans that
23 outline long-term strategies design to achieve compliance with National Air Quality Standards (NAAQS)
24 and California Ambient Air Quality Standards (CAAQS) within the SDAB.

25
26 Cumulative impacts on regional air quality are addressed by the SDAPCD thresholds of significance for
27 construction and operational criteria pollutant emissions and represent the levels at which a project's
28 individual emissions of criteria air pollutants and precursors would result in a cumulatively considerable
29 contribution regional air quality impacts. SDAB is in nonattainment for O₃ under both NAAQS and
30 CAAQS, and in nonattainment for O₃, PM₁₀, and PM_{2.5} under CAAQS. Past, present, and probable future
31 projects in the SDAB have resulted in the nonattainment status. The cumulative impact on existing air
32 quality violations in the SDAB and cumulative emissions from probable future projects of criteria
33 pollutants for which the SDAB are in nonattainment would be significant.

34
35 Emissions generated during construction of the proposed project would not exceed the SDAPCD
36 significance thresholds for ozone precursors in the SDAB and would not exceed SDAQMD significance
37 thresholds for any air pollutant (refer to Section 5.3: Air Quality, Impact b). The proposed project's
38 contribution to a significant cumulative impact to an existing air quality violation and nonattainment of
39 ozone would therefore be less than considerable.

40
41 SDG&E has agreed to implement four Project Design Features and Ordinary Construction Restrictions as
42 part of project construction to control and suppress fugitive dust and other related air quality impacts.
43 These design features and construction restrictions include to: secure bulk materials during transport to
44 and from staging areas; minimize heavy machinery use to avoid emission peaks; and reduce the use of

1 VOCs by using low- and non-VOC-containing coatings, sealants, adhesives, solvents and architectural
2 coatings. By implementing these measures, uncontrolled and controlled emission rates from project
3 construction would not exceed SDAPCD thresholds.
4

5 The construction schedule for the proposed project could potentially overlap with the construction
6 schedules for the following reasonably foreseeable projects listed in Table 5.19-1:
7

- 8 • El Camino Real Bridge/Road Widening Project
 - 9 • Street lighting in the Via De La Valle Underground Utility District
- 10

11 An additional fourteen projects have construction timelines that are unknown, which with varying levels
12 of probability could overlap with the proposed project. Of the planned and proposed projects listed in
13 Table 5.19-1 that may have potentially overlapping construction timelines with the proposed project and
14 for which environmental impact documents are available, none would be anticipated to result in
15 significant air quality impacts or exceed applicable air quality thresholds and conflict with applicable
16 criteria air pollutants. The project's contribution to cumulative air quality impacts would be less than
17 considerable.
18

19 Biological Resources

20 As described in Section 5.4, Biological Resources, the proposed project is anticipated to have temporary,
21 less-than-significant impacts during construction in regards to sensitive species, sensitive natural
22 communities, jurisdictional waters, and wildlife population and movement patterns. Cumulative impacts
23 to biological resources could occur because of increased ground-disturbing activities by multiple projects.
24 These cumulative activities could increase the distribution of normal animal breeding, foraging, and
25 migration behavior, the removal of suitable habitat for multiple special-status plant and wildlife species,
26 and the degradation of jurisdictional water features.
27

28 As previously discussed, construction of the proposed project and three of the projects listed in Table
29 4.19-1. An additional seven projects have construction timelines that are unknown and could overlap with
30 the proposed project. Cumulative impacts to biological resources could occur as a result of increased
31 ground-disturbing activities by multiple projects that could disrupt normal animal breeding, foraging, and
32 migration behavior, as well as the potential removal of suitable habitat for multiple special-status plant
33 and animal species, including species that are protected under the federal Endangered Species Act
34 (FESA) and the California Endangered Species Act (CESA), particularly within portions of the proposed
35 project. Other planned and proposed projects (e.g., El Camino Real Bridge/Road Widening Project No.
36 2982, Estates and Del Mar Subdivision, and Spectrum III and IV) would also have impacts to special-
37 status species and their habitat. While the proposed project and other planned and proposed projects may
38 impact sensitive species, all projects within the cumulative scenario would be subject to the same
39 permitting requirements under the FESA and CESA, which are intended to minimize and mitigate
40 impacts to species, both at the project level and in a regional context. Therefore, the project's contribution
41 to cumulative impacts to sensitive species and critical habitat would be less considerable after the
42 required avoidance, minimization, and compensatory mitigation measures are implemented.
43

1 The proposed project has been designed to avoid impacts to jurisdictional wetlands and waters and all
2 proposed structures would be installed outside of the boundaries of jurisdictional wetlands and waters.
3 With the implementation of SDG&E's Subregional NCCP Operational Protocols and Habitat
4 Enhancement Measures, APMs identified in Section 5.4, Biological Resources, and **MM BR-1** through
5 **MM RB-8** the proposed project would not contribute considerably to a cumulative impact to
6 jurisdictional wetlands and waters.
7

8 As discussed in Section 5.4, Biological Resources, the proposed project is located within a number of
9 wildlife corridors and preserve areas, including the San Dieguito Lagoon, Los Peñasquitos Lagoon,
10 Torrey Pines State Natural Reserve Extension, Multiple Habitat Planning Area, and the Pacific Flyway.
11 The Spectrum III and IV project may have effects on wildlife movements, however, the project site is not
12 designated as a Multiple Species Conservation Program regional wildlife corridor as it does not provide a
13 throughway for wildlife species by connecting with major areas of off-site habitat. With implementation
14 of SDG&E's Operational Protocols and Habitat Enhancement Measures, APMs, and **MM BR-1** through
15 **MM BR-8** the project would not make a considerable contribution to cumulative impacts to native
16 wildlife movements.
17

18 The proposed project would not conflict with local policies or conservation plans resulting in such
19 conflicts causing significant impacts on the environment; the proposed project would similarly not
20 contribute to a cumulatively considerable impact related to conflicts with local policies and conservation
21 plans.
22

23 Cultural Resources

24 Cultural, paleontological and tribal resource impacts are highly localized in that these types of resources
25 are affected in discrete areas; therefore, the cumulative cultural resources analysis uses a list-based
26 approach to determine whether potential cumulative impacts could occur, and if so, whether the project's
27 contribution to such impacts would be considerable. The geographic scope to cumulative cultural,
28 paleontological and tribal resources would include all ground-disturbing projects within 100 feet of
29 proposed project work areas that could materially affect the significance of known or as of yet unknown
30 resources. The geographic scope is limited because cultural resources are discrete and typically not very
31 large, such that two projects would need to be located near one and other (and both engage in similar soil-
32 disturbing activities) to potentially impact – and exacerbate impacts – to the same resource.
33

34 As described in Section 5.5 Cultural Resources, the proposed project is anticipated to have temporary,
35 less-than-significant impacts and less-than-significant impacts with mitigation incorporated during
36 construction concerning historic, archaeological and paleontological resources, and potential for
37 disturbance to human remains. Project construction activities could potentially affect six historic
38 resources, one of which was determined to be eligible for inclusion in the California Register of Historic
39 Resources (CRHR) as well as potentially affect six archaeological sites, four of which may be eligible for
40 CRHR listing. These potential resources would be avoided or effects would be reduced to less-than-
41 significant levels with implementation of SDG&E's Project Design Features and Ordinary Construction
42 Restrictions and mitigation measures **MM CUL-1** through **MM CUL-4**.
43

1 While the potential for cumulative impacts to cultural resources during construction of these projects in
2 combination the proposed project exists, it is unlikely that the project would make a considerable
3 contribution to cumulative cultural resources impacts.
4

5 The planned and proposed project applicants would implement mitigation measures, such as requiring
6 construction monitoring to address potential impacts to buried resources, to further reduce potential
7 impacts. Further, relatively small segments of the proposed project would take place in previously
8 undisturbed areas and SDG&E would implement Project Design Features and Ordinary Construction
9 Restrictions to avoid or minimize potential impacts to cultural resources; therefore, the proposed project's
10 cumulative contribution would not be significant.
11

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

17
18 Fossils may be encountered during construction of the other planned and proposed projects; however,
19 most projects would occur within existing roadways or within areas that are previously disturbed or
20 developed, where the likelihood of encountering paleontological resources is low. Further, to minimize
21 any impacts to paleontological resources during construction, SDG&E would implement Project Design
22 Features and Ordinary Construction Restrictions to ensure the proper salvage, relocation, and
23 management of fossils if they are encountered during excavation in areas of high paleontological
24 potential. While the project may have the potential to adversely affect paleontological resources, it is not
25 anticipated to result in or contribute considerably to any cumulative impacts because the conditions for
26 cumulative paleontological resource impacts are not met—that is, none of the foreseeable projects would
27 necessitate ground-disturbing activities within 100 feet of the project such that soil disturbance resulting
28 from the proposed project and from other reasonably foreseeable projects would exacerbate the potential
29 for cumulative impacts. Therefore, no cumulative paleontological resource impacts are likely; potential
30 impacts would be limited to project effects that would be subject to mitigation identified in this IS/MND
31 and would not be cumulatively considerable. Additionally, similar strategies would be required for the
32 planned and proposed projects that are underlain by geologic rock units/formations with high
33 paleontological potential in the event of an unanticipated discovery. Therefore, with the implementation
34 of Project Design Features and Ordinary Construction Restrictions, a cumulatively considerable impact to
35 paleontological resources is not anticipated.
36

37 Geology and Soils

38 The project area is relatively flat and is not conducive to landslides nor is it in an area of known
39 liquefaction danger; moreover, the project area would not intersect any known Alquist-Priolo Earthquake
40 Fault Zone. Proposed project excavations would be relatively shallow (approximately 40 inches) and, for
41 the most part, would be filled within 24 hours. The proposed project would also involve trenching, and
42 bare soils would be exposed immediately following construction, which would be susceptible to erosion.
43 As a result, the proposed project, in combination with other reasonably foreseeable projects, could have a
44 potential cumulative effect with regard to soil erosion if measures addressing erosion are not

1 implemented. The proposed project, in combination with other reasonably foreseeable future projects
2 would be required to comply with the State Water Resources Control Board (SWRCB) National Pollutant
3 Discharge Elimination System (NPDES) permit requirements. Specifically, the applicant would prepare a
4 Stormwater Pollution Prevention Plan (SWPPP) outlining best management practices to control discharge
5 from project work areas. Moreover, as presented in Table 4-9, the applicant would implement **APM**
6 **GEO-1** related to incorporating the recommendations and findings of the project's final geotechnical
7 investigation pertaining to potential seismic activity, landslides, expansive soils, slope instability, and
8 differential settling. As a result, the proposed project would not have a considerable contribution to a
9 cumulative impact.

10 Greenhouse Gases

12 As previously discussed, climate change related impacts are global in nature and are generated by both
13 direct and indirect project activities. Similarly, GHG analyses and thresholds are also inherently
14 cumulative, so if a project would have less-than-significant effects under the applicable threshold of
15 significance, the project would not contribute to cumulatively considerable GHG impacts. Emissions
16 generated during the project's construction phase would not exceed applicable thresholds recommended
17 by the South Coast Air Quality Management District and the County of San Diego. SDG&E is required to
18 adhere to the standards and requirements established by the California Air Resources Board and the
19 SDAPCD to minimize the potential for mobile equipment used during project construction to contribute
20 to cumulative GHG emissions impacts. As such, the proposed project's contribution to cumulative GHG
21 impacts would not be considerable.

22 Hazards and Hazardous Materials

24 Cumulative impacts to hazards and/or hazardous materials impacts could potentially result from the
25 construction of concurrent projects as well as any increased risk the proposed project would have on the
26 public or worker safety, including exposure to hazardous materials, physical hazards, or increased fire
27 potential. SDG&E would comply with all applicable laws, rules, and regulations. Construction of the
28 proposed project would require only small amounts of hazardous materials, and the transport of these
29 materials would primarily occur during the approximately 12-month construction period.

31 The cumulative hazards and hazardous materials analysis uses the list approach to evaluate potential
32 impacts. The geographic scope of cumulative impacts are project-specific and thus highly localized. The
33 geographic scope would be the area immediately adjacent project work areas. This geography is limited
34 because there is low risk of a hazardous materials spill or release of the project. Foreseeable projects in
35 with overlapping construction timelines could have a temporary impact from accidental releases of diesel
36 and gasoline fuel, hydraulic fluids, and other hazardous liquids from construction equipment. While there
37 is potential for accidental spills and leaks during construction, there is no evidence to suggest that another
38 spill would occur in the immediate vicinity during a similar timeframe. With the adherence to federal and
39 state regulations, releases of hazardous materials from multiple sources simultaneously or in close
40 proximity would be highly unlikely. Should small releases occur, they would be contained, cleaned and
41 disposed of in accordance with applicable laws. As a result, cumulative impacts related to risk of spill or
42 upset from hazardous materials are anticipated to be less than significant and the project's contribution to
43 a cumulative hazards impact is not be considerable.

1 The majority of the project area is located within the California Department of Forestry and Fire
2 Protection (CAL FIRE) Fire Resource and Assessment Program's (FRAP's) Very High Threat to People
3 and High Threat to People classes. Construction activities could increase fire risk associated with the
4 presence of vehicles, equipment, and human activity in areas of elevated fire hazard severity. Cumulative
5 wildland fire risk could increase if reasonably foreseeable projects were concurrently undertaking
6 construction with the project within high fire hazard areas. The potential for concurrent projects to cause
7 heightened wild fire risk is reduced with the implementation of measure including implementing
8 comprehensive brush management plans and reducing hazards inside and around the perimeter of work
9 areas located in high-risk areas. All project-related impacts would be temporary in nature, and would not
10 last beyond the approximate 12-month construction period. As a result, the proposed project would not
11 have a considerable contribution to a cumulative impact.

12 13 Hydrology and Water Quality

14 A cumulative impact could result from multiple projects depleting groundwater supplies or involving a
15 significant amount of grading in a shared watershed, which could alter natural drainage patterns,
16 contribute to increases in runoff, or result in a degradation of water quality. There would be no
17 cumulative impacts to groundwater depletion because water used for dust control during project
18 construction would be obtained from a municipal source, which would not affect local groundwater
19 supplies. As previously discussed, construction of the proposed project and three of the projects listed in
20 Table 5.19-1 could occur simultaneously. An additional seven projects have construction timelines that
21 are unknown and could overlap with the proposed project.

22
23 The construction schedule of the El Camino Real Bridge/Road Widening Project could potentially
24 overlap project construction activities, which may affect hydrology and water quality because of
25 combined soil disturbance from grading, clearing, and excavation. These activities could cause erosion
26 and sedimentation, and thus degrade water quality. However, the potential for soil erosion and
27 sedimentation would be minimized through the implementation of SWPPPs, which would be required for
28 all projects that disturb one or more acres of soil. Further, while minor alterations to drainage patterns
29 could occur during construction of the proposed project, all areas disturbed during grading would be
30 restored to original contours, and surrounding areas would be restored and repaired, as appropriate. With
31 implementation of the SWPPP and BMPs, cumulative impacts to hydrology and water quality are
32 expected to be less than considerable.

33 34 Noise

35 The simultaneous construction of the project in conjunction with other reasonably foreseeable projects
36 may result in cumulative impacts to noise. As previously discussed, construction of the proposed project
37 and two of the projects listed in Table 5.19-1 could occur simultaneously. An additional seven projects
38 have construction timelines that are unknown and could overlap with the proposed project. However,
39 none of them are located adjacent to the proposed project. Other projects (e.g., the Estates at Del Mar
40 Subdivision, and Del Mar City Hall/Town Hall Project) would also generate noise during construction,
41 and a temporary cumulative increase in noise could result when construction of these and other projects
42 occur simultaneously with construction of the proposed project.

1 Construction of the planned and proposed projects would generally be limited to the timeframes
2 established by the local ordinances. Construction of the proposed project would also adhere to the adopted
3 times when construction is allowed, and in cases where construction hours may local ordinances may be
4 exceeded, variances from the standards ~~will~~ would be pursued and granted according to. Further, due to
5 the linear nature of the proposed project, contribution to noise impacts due to construction of the proposed
6 project at any one location would be limited in duration, and impacts would be temporary.

7 8 Public Services

9 Cumulative impacts to public services could occur if the service demands associated with the proposed
10 project were to combine with those of other reasonably foreseeable projects resulting in substantial
11 adverse physical impacts from the construction of new or physically altered government facilities.
12 Potential environmental effects to public services and service providers include those relating to fire and
13 police protection, schools, parks, as well as others such as medical facilities.

14
15 As discussed in Section 5.14, “Public Services”, the project would result in no impact or have less than
16 significant impacts to public services. Construction of multiple projects at once in the project vicinity may
17 incrementally increase demands for public services, but it would be speculative to conclude that increased
18 demands on service providers even if considered in a cumulative context alone would result in significant
19 environmental impacts. For the evaluation of public service impacts, the CEQA Guidelines are concerned
20 with the possibility that *construction of new or physically altered government facilities* – not merely the
21 potential increase in demand for public services – causes potentially significant environmental impacts.
22 There is no evidence that the proposed project’s temporary demands on public service providers – either
23 individually or in combination with those of reasonably foreseeable projects – would require new or
24 physically altered facilities to meet heightened demands. Neither the proposed project nor the project in
25 combination with other reasonably foreseeable projects would increase demands for public services that
26 would necessitate the construction or expansion of new public facilities. The proposed project’s
27 contribution to cumulative impacts on public services is therefore not considerable.

28 29 Recreation

30 Similar to the topic of public services, the criteria for evaluating project impacts to recreational resources
31 asks whether a project would increase the use of existing neighborhood, regional or other parks and
32 recreational facilities. If affirmative, the criterion then asks if the project would cause or accelerate
33 substantial physical deterioration of the facility. The second criterion in evaluation of project impacts to
34 recreation asks whether a project would require new or expanded recreational resources, which might
35 have a substantial effect on the environment. As reported in Section 5.15, the project would not increase
36 the use of parks or recreational facilities. Therefore, the project would not cause accelerated deterioration
37 to existing local or regional recreational sites or facilities. Regarding the second criterion, no new or
38 expanded recreational resources would be required of the proposed project, therefore there would be no
39 direct construction impacts associated with this criterion.

40
41 In a cumulative context, the focus shifts from the proposed project’s potential direct effects (use) to
42 potential indirect effects related to construction on recreational resources. Cumulative recreation impacts
43 would be the impacts of the project on recreational facilities in combination with likely effects from
44 reasonably foreseeable projects on recreational facilities. **MM REC-1** at requires the applicant to

1 document pre- and post-construction conditions at the Torrey Pines State Beach parking lot (that would
2 be used as a Fly Yard) and at Del Mar Heights School (also used as a Fly Yard and materials staging and
3 storage area) during construction. Documentation ensures that the temporary activities on those sites that
4 provide recreational uses would be returned to preconstruction conditions and requires any surfaces be
5 repaired if damaged or degraded by the temporary construction activities that would occur there. Given
6 that no reasonably foreseeable project appears likely to have recreational impacts on these or any other
7 recreational facility in the vicinity with which the potential effects of the proposed project would
8 combine, the project would therefore not make a considerable contribution to cumulative recreational
9 impacts.

10 11 Transportation and Traffic

12 Simultaneous construction of the proposed project and the planned and proposed projects could cause
13 cumulative impacts to traffic. The proposed project would have short-term, temporary effects on traffic
14 due to potential lane closures and construction requiring the implementation of traffic controls. During
15 construction, construction work areas would likely cause congestion through the reduction of lane
16 capacity serving the roadway network in the project vicinity. Cumulative effects would be any of the
17 reasonably foreseeable projects occurring at the same time, within the same general vicinity of the
18 proposed project while also contributing to construction-related temporary street closures and/or
19 construction traffic and congestion. As previously discussed, construction of the proposed project and
20 three of the projects listed in Table 5.19-1 could occur simultaneously, though as noted in the table, the
21 San Dieguito track and trestle replacement project's funding source is not yet secured. In addition, seven
22 foreseeable projects have construction timelines that are unknown and may overlap with the proposed
23 project.

24
25 Congestion resulting from reduced roadway capacity from lane closures would likely increase in the
26 surrounding area during concurrent construction of these projects. These effects would be temporary and
27 intermittent and could affect emergency vehicle access and circulation as well. The proposed project
28 would implement measures to notify emergency service providers in advance of any road closures prior to
29 commencement of construction work. This advance notification could be used to coordinate and evaluate
30 alternative routes for emergency vehicles to ensure network access and response times are not
31 significantly affected by the lane closures and construction-related congestion attributable to the project in
32 combination with other reasonably foreseeable projects. Similar to the proposed project, other future
33 projects would obtain encroachment permits, and planned traffic control measures for each would be
34 reviewed and coordinated by San Diego or Del Mar's planning and community development departments,
35 depending on jurisdiction. Although project construction activities may occur simultaneously with those
36 of foreseeable projects, effects would be intermittent, temporary and would be reduced to less-than-
37 significant levels through coordinated reviews of encroachment permits and required traffic control plans.

38
39 The proposed project would have no impact to circulation plans or policy conflicts or air traffic patterns;
40 therefore, it would not contribute to a cumulatively considerable impact related to circulation plans or
41 policy conflicts or air traffic patterns.

1 Utilities and Service Systems

2 The proposed project is anticipated to have temporary, less-than-significant impacts during construction
3 in regards to wastewater treatment exceedances, water supply availability, and landfill capacity.
4 Cumulative impacts to utilities or service systems have the potential to occur if multiple projects have a
5 combined impact on local utility services or infrastructure. The proposed project would not generate
6 wastewater during construction; however, in the event that groundwater is encountered, dewatering may
7 be necessary. The water would be analyzed and treated, as necessary and would be discharged or disposed
8 of in accordance with applicable federal, state, and local requirements; and as such, the proposed project
9 would not contribute considerably to a cumulative impact.

10
11 The proposed project would use minimal amounts of water during construction activities to control dust
12 on non-paved portions of the proposed project area that would necessitate approximately 700,000 gallons
13 of water for this purpose. Construction of the proposed project would potentially overlap with three of the
14 projects listed in Table 5.19-1. Seven additional projects could also overlap with proposed project
15 construction, as their construction timelines are unknown. If these projects are constructed within the
16 same timeframe, they could produce a temporary, cumulative impact on water purveyors. However, all of
17 the applicants for the planned and proposed projects would need to coordinate with water providers prior
18 to construction to ensure that the providers can accommodate the demand. Because the proposed project's
19 relatively low water demand would be temporary and short-term, the impact on a water purveyor's long-
20 term water supply would be insignificant. Therefore, the proposed project's contribution to a cumulative
21 impact to water supply would be less than considerable.

22
23 Local area landfills could be impacted due to the increased cumulative need for disposal of construction
24 debris. The proposed project would generate limited quantities of construction waste (i.e., refuse, spoils,
25 trash, poles, etc.) that would ultimately be transported to the Miramar Landfill and disposed of properly in
26 accordance with all applicable federal, state, and local laws regarding solid and hazardous waste disposal.
27 The amount of daily construction waste for the projects listed in Table 5.19-1 is unknown; however,
28 construction debris would be generated by these projects as well. The Miramar Landfill accommodates
29 approximately 910,000 tons of waste per year, has the capacity to accept a total of approximately 15.5
30 million cubic yards of additional waste, and is expected to reach capacity by the year 2022. Solid waste
31 generated by the proposed project and other projects would decrease the capacity of the Miramar Landfill;
32 however, the amount would not be enough to significantly affect the capacity. Any impacts on landfills
33 caused by the construction and operation of the planned and proposed projects would also be required to
34 conform to the regulations and policies of the local jurisdictions. As a result, the cumulative impact not be
35 considerable.

36
37 Construction of the proposed project would have no impact to existing municipal water or wastewater
38 treatment systems, stormwater drainage facilities, or wastewater treatment capacity, and the proposed
39 project would not violate any solid waste statutes or regulation. The proposed project would utilize
40 minimal amounts of water during construction activities to control dust on non-paved portions of the
41 proposed project area. In total, approximately 700,000 gallons of water is estimated to be required.
42 Construction of the proposed project would potentially overlap with three of the projects listed in Table
43 5.19-1. Seven additional projects could also overlap with proposed project construction, as their
44 construction timelines are unknown. If these projects are constructed within the same timeframe, they

1 could produce a temporary, cumulative impact on water purveyors. However, all of the applicants for the
2 planned and proposed projects would need to coordinate with water providers prior to construction to
3 ensure that the providers can accommodate the demand. Because the proposed project's relatively low
4 water demand would be temporary and short-term, the impact on a water purveyor's long-term water
5 supply would be insignificant. Therefore, the proposed project's contribution to a cumulative impact to
6 water supply would be less than significant. Local area landfills could be impacted due to the increased
7 cumulative need for disposal of construction debris. The proposed project would generate limited
8 quantities of construction waste.

9
10 **Significance: Less than Significant with Mitigation Incorporation.**

11
12 *c. Does the project have environmental effects, which will cause substantial adverse effects on human*
13 *beings, either directly or indirectly?*

14
15 The proposed project would not cause substantial adverse effects on human beings either directly or
16 indirectly. The proposed project would result in temporary impacts to human health during construction,
17 including changes to air quality, exposure to geologic hazards, and exposure to hazardous materials. As
18 discussed in Section 5.3, "Air Quality," air quality effects would be less than significant. As discussed in
19 Section 5.8, "Hazards and Hazardous Materials," hazard impacts would be less than significant with the
20 implementation of APMs and mitigation measures, including preparation and implementation of a
21 Hazardous Materials Management Plan and implementation of worker safety training and an updated
22 Spill Prevention Control and Countermeasure Plan. Operation and maintenance activities would be
23 comparable to current activities, and no additional impacts on human beings would occur.

24
25 **Significance: Less than Significant.**

26
27 **References**

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