THE CITY OF SAN DIEGO

ADDENDUM TO A ENVIRONMENTAL IMPACT REPORT

Project No. 1084313
Addendum to EIR No. 94-0510
SCH No. 94-101024

SUBJECT: **POINT LOMA WASTEWATER TREATMENT PLANT STORMWATER DIVERSION**: The Point Loma Wastewater Treatment Plant (PLWTP) Stormwater Diversion Project (Project) proposes to reduce pollutant concentrations in stormwater discharged from PLWTP to below specific numeric levels. Work includes the construction of six submersible storm drain lift stations and check valve vaults; installation of approximately 605 Linear Feet (LF) of 4-inch force main, 600 LF of 6-inch force main, and 850 LF of 8-inch force main; regrading of small areas to improve drainage; installation of 45 LF of trench drain, 365 LF of 8-inch polyethylene pipe, 1,365 LF of 24-inch reinforced concrete pipe (RCP), 21 catch basins and cleanouts, 80 LF of ribbon gutter, and sidewalk and curb gutter replacement; and improvements to the concrete basin, Gas Utilization Facility, and the South Effluent Screening Facility. The Project also includes the installation of 1,240 linear feet of electrical conduit, liner repair of a 60-foot length of the existing outfall #4 pipe, and a minor correction to an existing MHPA boundary. The Project area is located on the west side of the southern tip of Point Loma within the boundaries of the Peninsula community planning area. The Project is partially located within the Multi-Habitat Planning Area (MHPA) and is within the Coastal Zone. LEGAL DESCRIPTION: Township 17 South Range 4 West Tract 38. APPLICANT: City of San Diego Engineering & Capital Projects.

I. SUMMARY OF PROPOSED PROJECT

In November 2018, the City of San Diego entered a Consent Decree with San Diego Coastkeeper and Coastal Environmental Rights Foundation, which outlines obligations to reduce pollutant concentrations in stormwater discharged from Point Loma Wastewater Treatment Plant (PLWTP) to below specific numeric levels. Based on preliminary analysis, the City of San Diego decided to capture and route stormwater discharges to the PLWTP headworks for treatment. The proposed Project would replace existing storage manholes with submersible pumps in new wet wells and install storm drains, ribbon gutters, drain cleanouts, swales, and berms to capture stormwater runoff from within the PLWTP facility footprint.

Work includes the construction of six submersible storm drain lift stations and check valve vaults, approximately 605 Linear Feet (LF) of 4-inch force main, 600 LF of 6-inch force main, and 850 LF of 8-inch force main, regrading of small areas to improve drainage, installation of 45 LF trench train, 365 LF of 8-inch polyethylene pipe, 1,365 LF of 24-inch reinforced concrete pipe (RCP), 21 catch basins

and cleanouts, 80 LF of ribbon gutter, sidewalk and curb gutter replacement, improvements to the concrete basin, Gas Utilization Facility, and the South Effluent Screening Facility. The Project also includes the installation of 1,240 linear feet of electrical conduit. Minor horizontal directional drilling may be required at the top of the stairs for the force mains from PS2B and PS2A. When feasible, storm drain installation was designed to minimize ground disturbance. In areas where this is not feasible, storm drain piping is proposed to be installed in open-cut trenches. The depth of the trenches would range from approximately 2 to 20 feet. When needed, sheeting and shoring would be used to stabilize trench walls during excavation. Trenches are expected to be 24 to 48 inches wide where storm drain piping is proposed for installation.

Stormwater diversion has been proposed to address industrial stormwater discharges from within the PLWTP footprint. To comply with the early termination of consent decree option, best management practices (BMPs) must be designed to capture the volume of runoff produced during an 85th-percentile 24-hour storm, with a 24-hour drawdown time or additional storage volume to offset a longer drawdown time. Under the existing condition, the five ocean outfalls (i.e., Point Loma Stormwater Diversion 1 [PLSD] 1, PLSD2, PLSD3, PLSD3A, and PLSD4) discharge stormwater runoff from both industrial and non-industrial areas to the ocean. The proposed system is designed to capture the “first flush” of pollutants commonly found in industrial stormwater at the plant. The system then proposes to pump this industrial stormwater to the plant headworks for treatment, prior to discharge into the ocean.

Additionally, the proposed storm drain system also is designed to divert non-industrial stormwater from the hillside east of the treatment plant by re-directing flows around the industrial areas (avoiding co-mingling) prior to discharge into the ocean via the existing ocean outfalls.

To prevent co-mingling of industrial stormwater flows with potentially hazardous waste stormwater flows from the gas utilization facility, the system also proposes installation of ribbon gutters and grading to direct this flow to a storage tank which will be pumped via vac truck and managed separately by the asset owner.

The Project scope also includes liner repair of an approximately 60-foot section of the existing 36-inch Outfall #4 pipe using trenchless, cured-in-place methods to minimize impacts to the coastal bluff. No excavation or ground disturbance is proposed within the coastal bluff for this liner effort. Construction equipment anticipated to be used on this Project includes backhoes, dump trucks, augers, and compaction equipment. Staging and stockpile areas are expected to be placed in the northernmost portion of the Project site. An alternative staging area in the southwest portion of the site is also identified if needed. Aboveground piping would be installed along existing infrastructure (e.g., existing concrete walls, handrails, spillways) to minimize impacts on existing vegetated slopes. This Project includes grading activities in existing parking areas.

Details for stormwater capture systems (wet wells, trench drains, berms, and regrading) are shown in Tables 1, 2, and 3. Note that regrading and installing an additional trench drain and underground storage area for the Gas Utilization Facility (GUF) are also included in this Project scope to prevent hazardous secondary containment overflows from comingling with industrial stormwater flows which currently enters the PLSD3A concrete basin.

Table 1. Wet Well Summary of Construction Footprints and Excavation Volumes

Wet Well	Depth (ft)	Excavation Footprint (sf)		Excavation (CYs)	
		Wet Well and Vault	Force Main Trench	Wet Well and Vault	Force Main Trench
PS1	18.70	356	1,120	250	210
PS2A	18.21	356	445	240	85
PS2B	10.13	255	285	285	55
PS2C	11.58	325	260	165	50
PS3	19.22	325	1120	225	220
PS4 & FM	30.33	524	725	480	135
PS Total		2,142	3,955	1,480	755

Table 2. Grading and Trench Drain Areas

Location	Grading Area (sf)	Excavation (sf)	Excavation Volume (CYs)
Access Road next to North Operation Facility	225		
Cabrillo Road by PS4	90		
PS2C Grading and Trench Drain	2,855	830	40
PS2B Trench Drain		85	10
GUF Grading		890	100
GUF Underground Storage		400	300
TOTAL	3,170	2,205	450

Table 3. Storm Drain System Components

Storm Drain System	Trench Width (in)	Pipe Size (in)	Length (ft)	Depth (ft)	Number of Cleanouts	Excavation Volume (CYs)
North	24-36	8-24	580	6 to 20	11	1,350
South	42-48	30-36	110	2-3	1	55
South 4B	2	8	130	5 to 7	1	85
GUF	24	12	50	6 to 10	1	60
TOTAL			930			1,550

The stormwater capture systems (wet wells, force main trench drains, and berms) total approximately 6,097 square feet of excavation area footprint. The grading and trenches for both storm drains and DCS conduit will include approximately 3,170 square feet of excavation area (see Table 4). There will be minor horizontal directional drilling at the top of the stairs for the PS2A force main. All storm drain piping will be installed open-cut, with the exception of the segments described above. Open-cut trenches will utilize sheeting and shoring. Trench widths are expected to range from two to four feet for storm drains and trench drains. Trench work will range from approximately

6 to 20 feet deep. Storm drains will be installed with open cut trenches per City of San Diego Standard Drawing (CSDSD) SDW-110.

Table 4. Power and DCS Trench and Excavation

Description	Electrical Conduits Total Length (ft)	Above Grade (ft)	Total Trench Length (ft)	Trench Width (ft)	Trench Area (sf)	Average Depth (ft)	Trench Excavation (CYs)
PS1B power	140		140	1	140	3	1.94
PS1B DCS							Note 1
PS2A to MCC	160	70	90	1	90	2	0.83
PS2A power	160	85	Note 2	N/A	N/A	N/A	N/A
PS2A DCS	265	190	Note 2	N/A	N/A	N/A	N/A
PS2A common trench			75	1	75	3.5	1.21
PS2B power	230	200	Note 2	N/A	N/A	N/A	N/A
PS2B DCS	205	120	55	1	55	2	0.51
PS2B common trench			30		0	3.5	0.00
PS2C power	160	55	80	1	80	3	1.11
PS2C DCS	175	60	90	1	90	2	0.83
PS2C common trench			25	1	25	3.5	0.40
PS2C MOV Power and DCS	120	0	120	1	120	3	1.66
PS3 power	170	65	105	1	105	3	1.45
PS3 DCS	280	60	220	1	220	2	2.03
PS4 power	180	0	40	1	40	3	0.55
PS4 DCS	140	0	Note 2	N/A	N/A	N/A	N/A
PS4 common trench			140	1	140	3.5	2.26
PS4 MOV	30		30	1	30	3.5	0.48
Total			1,240		1,210		15.25

Notes:

1. *DCS is from the control panel next to the North Operations Building. Conduit is all above grade within the building.*
2. *Length is included in the common trench of power and DCS conduits.*

II. ENVIRONMENTAL SETTING

The Project area is situated within coastal San Diego County, on the west side of the southern tip of Point Loma. Existing land uses surrounding the PLWTP include park and military uses. The Project area is bounded by the Cabrillo National Monument to the south, Fort Rosecrans National Cemetery to the north and east, and the Pacific Ocean to the west. The Project area is situated primarily at the base of the west-facing slope of Point Loma and has been previously disturbed by man-made terracing and leveling for the existing wastewater treatment facility, which is surrounded by a mix of native and non-native plant species. Access to the site is via Lands End Road and Cabrillo Road.

The PLWTP site is within the boundaries of the Peninsula community planning area in Council District 2. The site is designated as "Public, Semi-Public: Public Utility." The Project lies within the Airport Land Use Compatibility Overlay Zone (ALUCOZ), ALUCP Airport Influence Area (AIA) Review Area 2, and FAA Part 77 Noticing Area for Naval Air Station (NAS) North Island at 111 feet elevation. The Project is also in the Coastal Overlay Zone, Coastal Height Limit Overlay Zone (CHLOZ), First Public Roadway (COZFPR), Parking Impact Overlay Zone (PIOZ) -COASTAL-IMPACT. The Project is partially within the Multi Habitat Planning Area (MHPA) and within the Very High Fire Severity Zone (VHFSZ). See Figure 1 for a general vicinity map (Attachment 1) and Figure 2 for more detailed site map (Attachment 2).

III. SUMMARY OF ORIGINAL PROJECT

The PLWTP Master Plan comprises several individual projects that are at different stages of planning and design. The PLWTP Master Plan is intended to provide a comprehensive plan for the overall upgrade and expansion of the plant to a capacity of 240 million gallons per day (MGD) by 2028. The PLWTP is a key element of the City's Metropolitan Sewerage System. The improvements proposed for the PLWTP are part of the Metropolitan Wastewater Department's (MWWD's) goal to provide the public with a safe and efficient regional wastewater management system that protects ocean water quality, supplements the city's limited water supply, and meets federal standards at the lowest possible cost. The improvements encompassed within the PLWTP Master Plan are designed to be sensitive to the environmental and scenic resources of the area.

IV. ENVIRONMENTAL DETERMINATION

The City previously prepared and certified the Point Loma Master Plan Environmental Impact Report (EIR) No. 94-0510/SCH No. 94101024. Based on all available information in light of the entire record, the analysis in this Addendum, and pursuant to Section 15162 of the State CEQA Guidelines, the City has determined the following:

- There are no substantial changes proposed in the project that will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;

- Substantial changes have not occurred with respect to the circumstances under which the project is undertaken which will require major revisions of the previous environmental document due to the involvement of new significant environmental effects or a substantial

increase in the severity of previously identified significant effects; or

- There is no new information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental document was certified as complete or was adopted, shows any of the following:

    a. The project will have one or more significant effects not discussed in the previous environmental document;

    b. Significant effects previously examined will be substantially more severe than shown in the previous environmental document;

    c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or

    d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous environmental would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Based upon a review of the current Project, none of the situations described in Sections 15162 and 15164 of the State CEQA Guidelines apply. No changes in circumstances have occurred, and no new information of substantial importance has manifested, which would result in new significant or substantially increased adverse impacts as a result of the Project. Therefore, this Addendum has been prepared in accordance with Section 15164 of the CEQA State Guidelines. Public review of this Addendum is not required per CEQA.

V. IMPACT ANALYSIS

The following includes the Project-specific environmental review pursuant to the CEQA. The analysis in this document evaluates the adequacy of the EIR relative to the Project.

Visual Quality/Landform Alteration

Point Loma Wastewater Treatment Plan Master Plan EIR

The PLWTP Master Plan EIR states that the PLWTP is in a scenic and visually sensitive area of San Diego, adjacent to the Cabrillo National Monument and the Fort Rosecrans National Cemetery. Overall, the site and surrounding vicinity can be characterized as a highly scenic landscape that has national as well as regional significance as a scenic and visual resource.

The visual characteristics of the area surrounding the PLWTP are considered highly sensitive because of the large number of visitors who come to the Cabrillo National Monument to enjoy the scenic qualities and historic attributes of the area. The scenic amenities at and around the Cabrillo National Monument contribute substantially to the park's value as a scenic resource. The 144-acre

Cabrillo National Monument encompasses the southern portion of the Point Loma Peninsula, with the exception of the U.S. Naval and Coast Guard installations at the tip of the peninsula. The Cabrillo National Monument has the distinction of being the most visited monument in the United States, with approximately 1.7 million visitors per year. Contained within the monument are a visitor and interpretive center, the historic Old Point Loma Lighthouse (a registered California Historical Landmark), tidepool viewing areas, and several miles of maintained hiking trails. One of the most notable assets within the park is the variety of public viewing areas, which provide scenic vistas of downtown San Diego and the Laguna Mountains to the north, east, and southeast and the ocean and horizon to the west and southwest.

The PLWTP Master Plan EIR found that construction activities may result in temporary impacts on visual resources. For example, the PLWTP Master Plan EIR concluded that grading and construction activities for the water tank/pipeline project, which includes an approximately 650,000-gallon industrial water tank and a 5,000-gallon domestic water tank, would be noticeable within public views from the Pacific Ocean (from the west looking east), from Fort Rosecrans National Cemetery (from the north looking south), and from Cabrillo Memorial Drive (from the east looking west). The temporary impacts of the water tank/pipeline project are related to the presence of graded earth, construction equipment, and tank wall forms and scaffolding. Installation of the tank pipelines, which would use trenchless technology, would have no visual impact. However, should trenching be required for pipeline installation, the resultant visual impacts would be generally limited to the interim loss of ornamental vegetation (e.g., ice plant). It was concluded that the development of the proposed water tank/pipeline project would not be expected to result in any notable blockage of public views, nor would it severely contrast with the existing character of the immediate area.

Project

For the proposed Project, existing facilities would be upgraded and expanded throughout the project site; the visual characteristics of the project site would not be altered. As such, the proposed Project would not result in additional impacts on visual quality/landforms.

Based on the foregoing analysis and information, there is no evidence that the Project would require a major change to the EIR. The Project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the EIR result.

Biological Resources

Point Loma Wastewater Treatment Plan Master Plan EIR

The PLWTP Master Plan EIR found no sensitive wildlife species on-site during biological surveys. Three sensitive wildlife species were observed off-site, and another eight were reported in the area. Most of the proposed master plan projects would be in disturbed/improved areas that do not have sensitive biological resources and, therefore, would not affect such resources. However, four of the proposed master plan components (i.e., NSPI, the Water Tank/Pipeline, Plant Access Road Improvements, Parallel Tunnel Outfall and Tie-In System) were found to have the potential to result in impacts on biological resources.

Potential impacts associated with the NSPI and the parallel tunnel outfall and tie-in system were discussed under Issue 2 of the PLWTP Master Plan EIR; these components would be oriented toward habitat for marine species. (Issues related to “sensitive species” or “important habitat” are primarily of a marine nature.) It was also determined that indirect impacts on biological resources would have

the potential to occur during project construction. These could include accidental grading of sensitive habitat, such as the maritime succulent scrub south of the project area; dust, erosion, and sedimentation; changes in surface hydrology and water quality; construction noise; and the introduction of invasive species. Potential impacts related to accidental grading outside of proposed construction areas would be avoided by requiring construction plans and specifications that clearly indicate the location(s) of the sensitive biological resource areas to be avoided and the maximum limits of work activity areas. Such areas would also be identified and staked in the field with the involvement of a qualified biologist.

The PLWTP Master Plan EIR also determined that dust from grading activities could accumulate on nearby vegetation and adversely affect local plant and animal life. Dust control measures would, however, be required as part of project construction activities to avoid significant impacts on biological resources. Grading associated with the implementation of the PLWTP Master Plan presents the potential for increased erosion and sedimentation impacts on downstream areas. Construction plans and specifications associated with master plan projects would include an erosion/ sedimentation control plan. Implementation of an erosion/sediment control plan would help the project avoid significant impacts.

The potential for pollutants from construction equipment, such as hydrocarbons from oil, grease, and fuel, as well as paints and metals, becoming entrained in surface runoff is another water quality concern for downstream biological resources. However, no significant impacts on such resources are anticipated because of (1) the distance between the project construction area and downstream coastal resource areas and (2) the requirements project contractors would be subject to regarding the use and storage of fuels, oils, and other chemicals, along with responsibilities for avoiding spills and immediately containing any spills or other release of hazardous materials. Noise from construction activities may temporarily disturb nearby wildlife, but significant impacts are not expected because sensitive species were not observed in the immediate vicinity of the master plan projects.

Revegetation plans for areas graded in conjunction with master plan projects would include provisions to prevent ornamental and invasive species from growing in existing maritime succulent scrub areas. Revegetation plans would incorporate the use of native species if and as appropriate. Implementation of the master plan projects is not expected to conflict with the Point Loma Natural Resource Management Plan (NRMP). The proposed domestic and industrial water tanks would not be within the reserve area; therefore, there would be no direct impacts on the reserve. Furthermore, the control of grading, erosion, and landscaping activities during construction, as described above, would minimize indirect impacts. Although the pipeline alignment under one of the analyzed projects within the master plan would be within the preserve boundary, the affected area (if trenching occurs) is occupied by non-native vegetation and would be replanted after construction. Potential indirect impacts from erosion and noise during construction would be short-term, localized, and controlled through construction plan requirements.

Potential impacts from projects analyzed in the master plan on marine habitats and species during the installation of riprap along the bluffs include temporary construction-related impacts such as an increase in turbidity, erosion and sedimentation, and noise and human activity. The shoreline area at and near the project site is characterized as a high-energy surf area that already experiences substantial turbidity. The incremental addition to turbidity is anticipated to be rapidly assimilated

into the existing natural setting. Impacts on overall phytoplankton productivity would be insignificant. No significant impacts on tidepools are expected because there are none in proximity to the project site.

It is possible that the additional noise and traffic during construction of the master plan projects may cause wildlife, including both resident and migratory marine mammals, to avoid the area during construction. Increased noise and activity during construction could affect roosting locations on the cliffs north of the project site. Potential disturbance impacts would be partially avoided with construction activities limited to daytime hours (i.e., 7 a.m. to 4 p.m.).

Grading of the bluff areas and inland areas would not affect sensitive terrestrial habitats because the proposed improvement area is generally disturbed and occupied by ornamental vegetation. The excavation of fill materials east of the tied-back wall and the graded fill pad on Navy property would increase the potential for erosion and sedimentation impacts on intertidal areas. Such impacts would be short-term and limited through erosion and sedimentation control measures, which would be required as part of construction plans and specifications. Long-term impacts would be avoided through landscaping (i.e., hydroseeding). In addition, direct impacts on sensitive species are not anticipated to occur because the project site is already disturbed. Indirect impacts due to construction would be mitigated through on-site revegetation, acquisition and permanent preservation of coastal sage scrub, off-site revegetation, contribution to the City's mitigation fund agreement, and contribution to other resource funds.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The project would not result in any new significant impact, nor result in a substantial increase in the severity of impacts from that described in the EIR.

Project

A Biological Technical Report for the Stormwater Diversion at the Point Loma Wastewater Treatment Plant Project was prepared by Balk Biological in April 2024 (Appendix A).

It was determined that direct impacts may include both the permanent and temporary loss of on-site habitat, as well as the plant and wildlife species within the on-site habitat. Direct impacts were quantified by overlaying the proposed impact footprint onto the biological resources map and evaluating the impacts by vegetation community. Direct impacts associated with this Project would be permanent, resulting from the replacement of existing storage manholes with package duplex submersible pumps and the installation of trench drains, gutters, swales, and berms to capture stormwater runoff at the PLWTP facility.

Implementation of the proposed Project will result in permanent and direct impacts to 2.441 acres of developed land and 0.138 acres of disturbed habitat. As shown in Table 5, implementation of the proposed Project will result in permanent impacts totaling 1.506 and temporary impacts to 1.073 acres, for a total of 2.579 acres of total impacts. Developed land, disturbed habitat, and riprap land cover types provide little native habitat value and foraging opportunities for wildlife and are considered Tier IV under the City's Biology Guidelines. Impacts on developed land, disturbed habitat, and riprap, therefore, would not be significant and would not require mitigation.

Table 5. Direct Impacts to Vegetation Communities and Land Cover Types

Direct Impacts to Vegetation Communities and Land Cover Types	SDBG Vegetation Community	City Subarea Plan Tier	Permanent Impacts (acres)	Temporary Impacts (Staging Areas) (acres)
Developed Land	Disturbed Land	IV	1.426	1.015
Disturbed Habitat	Disturbed Land	IV	0.080	0.058
Total			**1.506**	**1.073**

Four sensitive plant species were detected within the Project area buffer areas during surveys: California box-thorn, snake cholla, Torrey pine, and cliff spurge. No sensitive plant species were determined to have high or moderate potential to occur within the study area. Four species would have low to moderate potential to occur: slender-pod jewelflower, Orcutt's spineflower, San Diego sand aster, and sand-loving wallflower. Because the species detected are all within buffer areas and not directly within work areas, the potential for impacts on special-status plant species is less than significant.

Five special-status wildlife species were detected during the August 2022 surveys: harbor seal, osprey, double-crested cormorant, California brown pelican, and coastal California gnatcatcher. California brown pelican and coastal California gnatcatcher were observed within the Project study area, and none of these observations were inside impact areas. California brown pelican was observed in the buffer area, offshore to the west, and coastal California gnatcatcher was detected (one individual) just inside the buffer area on the north end of the site. Two additional gnatcatcher observations were made outside the buffer, 40 and 180 feet from the eastern edge of the buffer.

Four additional special-status species have moderate potential to occur but were not observed on-site: orange-throated whiptail, San Diego (Coast) horned lizard, northwestern San Diego pocket mouse, and western mastiff bat. All of these species, if present, could occur within Diegan coastal sage scrub, disturbed Diegan coastal sage scrub, and disturbed Diegan coastal sage scrub (revegetated). The Project would not result in significant direct impacts on sensitive vegetation communities. Western mastiff bat, if present, could also occur in areas mapped as developed—specifically, in cracks or holes in man-made structures. These types of structures are not within Project work areas; therefore, direct impacts on western mastiff bat from the loss of developed habitat are not anticipated.

During construction, indirect impacts that may affect sensitive vegetation communities and wildlife include dust, noise, erosion, temporary access impacts, and increased human presence. Long-term indirect impacts such as slightly increased noise and increased human presence associated long-term maintenance of the facilities are not expected to affect vegetation communities/land cover. Wildlife may be indirectly affected by construction-related noise which can disrupt normal activities and subject wildlife to higher predation risks. Indirect impacts on potentially present orange-throated whiptail, northwestern San Diego pocket mouse, San Diego (coast) horned lizard, and western mastiff bat would not be considered significant because of the low level of sensitivity of these species.

Breeding birds can be affected by short-term construction-related noise, which can result in the disruption of foraging, nesting, and reproductive activities. Indirect impacts on breeding wildlife from construction-related noise may occur if construction occurs during the breeding season (i.e., February 1 through September 15). Wildlife that may be affected by noise, based on suitable habitat in the Project vicinity and in accordance with the City's Land Development Manual Biology Guidelines, may occur up to 300 feet from the Project work areas. Species whose breeding/nesting may be affected by noise include coastal California gnatcatcher. Per the City's 2021 Standard Specifications for Public Works Construction ("Whitebook") Section 300-1.1, the Project proposes the following:

3. To avoid any direct impacts to raptors and/or any native or migratory birds, clearing, grubbing, or removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species (February 1 to September 15).
4. If the removal of habitat in the proposed area of disturbance must occur during the breeding season, a Qualified Biologist or City representative shall conduct a pre-construction survey to determine the presence or absence of nesting birds on the proposed area of disturbance. The pre-construction (precon) survey shall be conducted within 10 Working Days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the precon survey to City DSD for review and approval prior to initiating any construction activities. If nesting birds are detected, a letter report or mitigation plan in conformance with the City's Biology Guidelines and applicable state and federal laws (appropriate follow-up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided.
5. The report or mitigation plan shall be submitted to the City DSD for review and approval and implemented to the satisfaction of the City. The City's MMC Section or RE, and Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction. If nesting birds are not detected during the precon survey, no further mitigation is required."

Additionally, to comply with the City's MSCP and MHPA Land Use Adjacency Guidelines, the City's MMC Section or Resident Engineer, and Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction. The following are proposed as a condition of the Project:

Prior to issuance of Notice to Proceed, the owner/permittee shall depict the following requirements within the contract specifications and depict on construction documents (as necessary) for the Project Site.

- **Grading/Land Development/MHPA Boundaries -**Within or adjacent to the MHPA, all manufactured slopes associated with site development shall be included within the development footprint.

- **Drainage -** All staging and developed/paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials prior to release by incorporating the use of filtration devices, planted swales and/or planted detention/desiltation basins, or other

approved temporary and permanent methods that are designed to minimize negative impacts, such as excessive water and toxins into the ecosystems of the MHPA.

- **Toxics/Project Staging Areas/Equipment Storage -** Projects that use chemicals or generate by-products such as pesticides, herbicides, and animal waste, and other substances that are potentially toxic or impactive to native habitats/flora/fauna (including water) shall incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA. No trash, oil, parking, or other construction/development-related material/activities shall be allowed outside any approved construction limits. Provide a note in/on the CD's that states: "All construction related activity that may have potential for leakage or intrusion shall be monitored by the Qualified Biologist/Owners Representative or Resident Engineer to ensure there is no impact to the MHPA."

- **Lighting -**All lighting within or adjacent to the MHPA is directed away/shielded from the MHPA, or limited to the immediate area and is in compliance with City Outdoor Lighting Regulations per LDC Section 142.0740.

- **Barriers** –Existing fences/walls; and/or signage along the MHPA boundaries shall remain and or be added to direct public access to appropriate locations, reduce domestic animal predation, protect wildlife in the preserve, and provide adequate noise reduction where needed.

- **Invasives** - No invasive, non-native plant species shall be introduced into areas within or adjacent to the MHPA.

- **Brush Management -**Brush management zones will not be greater in size that is currently required by the City's regulations (this includes use of approved alternative compliance). Within Zone 2 the amount of woody vegetation clearing shall not exceed 50 percent of the vegetation existing when the initial clearing is done. Vegetation clearing shall be done consistent with City standards and shall avoid/minimize impacts to covered species to the maximum extent possible. For all new development, regardless of the ownership, the brush management in the Zone 2 area will be the responsibility of a home-owner's association or other private party.

- **Noise** - Construction noise that exceeds the maximum levels allowed (60 dB or greater at the beginning edge of the habitat) shall be avoided during the breeding seasons for the following: CA gnatcatcher (3/1-8/15). If construction is proposed during the breeding season for the species the following measures are required:

  Construction noise that exceeds the maximum levels allowed (60 decibels [dB(a)] or greater at the edge of the habitat) shall be avoided during the breeding season for: coastal California gnatcatcher (breeding season March 1 and August 15). If construction is proposed during the breeding season for the coastal California gnatcatcher, the following are required:

COASTAL CALIFORNIA GNATCATCHER (Federally Threatened)

Prior to the issuance of any grading permit, the City Manager (or appointed designee) shall verify that the Multi-Habitat Planning Area (MHPA) boundaries and the following project requirements regarding the coastal California gnatcatcher are shown on the construction plans:

NO CLEARING, GRUBBING, GRADING, OR OTHER CONSTRUCTION ACTIVITIES SHALL OCCUR BETWEEN MARCH 1 AND AUGUST 15, THE BREEDING SEASON OF THE COASTAL CALIFORNIA GNATCATCHER, UNTIL THE FOLLOWING REQUIREMENTS HAVE BEEN MET TO THE SATISFACTION OF THE CITY MANAGER:

A. A QUALIFIED BIOLOGIST (POSSESSING A VALID ENDANGERED SPECIES ACT SECTION 10(a)(1)(A) RECOVERY PERMIT) SHALL SURVEY THOSE HABITAT AREAS WITHIN THE MHPA THAT WOULD BE SUBJECT TO CONSTRUCTION NOISE LEVELS EXCEEDING 60 DECIBELS [dB(A)] HOURLY AVERAGE FOR THE PRESENCE OF THE COASTAL CALIFORNIA GNATCATCHER. SURVEYS FOR THE COASTAL CALIFORNIA GNATCATCHER SHALL BE CONDUCTED PURSUANT TO THE PROTOCOL SURVEY GUIDELINES ESTABLISHED BY THE U.S. FISH AND WILDLIFE SERVICE WITHIN THE BREEDING SEASON PRIOR TO THE COMMENCEMENT OF ANY CONSTRUCTION. IF GNATCATCHERS ARE PRESENT, THEN THE FOLLOWING CONDITIONS MUST BE MET:

   i. BETWEEN MARCH 1 AND AUGUST 15, NO CLEARING, GRUBBING, OR GRADING OF OCCUPIED GNATCATCHER HABITAT SHALL BE PERMITTED. AREAS RESTRICTED FROM SUCH ACTIVITIES SHALL BE STAKED OR FENCED UNDER THE SUPERVISION OF A QUALIFIED BIOLOGIST; AND

   ii. BETWEEN MARCH 1 AND AUGUST 15, NO CONSTRUCTION ACTIVITIES SHALL OCCUR WITHIN ANY PORTION OF THE SITE WHERE CONSTRUCTION ACTIVITIES WOULD RESULT IN NOISE LEVELS EXCEEDING 60 dB (A) HOURLY AVERAGE AT THE EDGE OF OCCUPIED GNATCATCHER HABITAT. AN ANALYSIS SHOWING THAT NOISE GENERATED BY CONSTRUCTION ACTIVITIES WOULD NOT EXCEED 60 dB (A) HOURLY AVERAGE AT THE EDGE OF OCCUPIED HABITAT MUST BE COMPLETED BY A QUALIFIED ACOUSTICIAN (POSSESSING CURRENT NOISE ENGINEER LICENSE OR REGISTRATION WITH MONITORING NOISE LEVEL EXPERIENCE WITH LISTED ANIMAL SPECIES) AND APPROVED BY THE CITY MANAGER AT LEAST TWO WEEKS PRIOR TO THE COMMENCEMENT OF CONSTRUCTION ACTIVITIES. PRIOR TO THE COMMENCEMENT OF CONSTRUCTION ACTIVITIES DURING THE BREEDING SEASON, AREAS RESTRICTED FROM SUCH ACTIVITIES SHALL BE STAKED OR FENCED UNDER THE SUPERVISION OF A QUALIFIED BIOLOGIST; OR

   iii. AT LEAST TWO WEEKS PRIOR TO THE COMMENCEMENT OF CONSTRUCTION ACTIVITIES, UNDER THE DIRECTION OF A QUALIFIED ACOUSTICIAN, NOISE ATTENUATION MEASURES (e.g., BERMS, WALLS) SHALL BE IMPLEMENTED TO ENSURE THAT NOISE LEVELS RESULTING FROM CONSTRUCTION ACTIVITIES WILL NOT EXCEED 60 dB(A) HOURLY AVERAGE AT THE EDGE OF HABITAT OCCUPIED BY THE COASTAL CALIFORNIA GNATCATCHER. CONCURRENT WITH THE COMMENCEMENT OF CONSTRUCTION ACTIVITIES

AND THE CONSTRUCTION OF NECESSARY NOISE ATTENUATION FACILITIES, NOISE MONITORING* SHALL BE CONDUCTED AT THE EDGE OF THE OCCUPIED HABITAT AREA TO ENSURE THAT NOISE LEVELS DO NOT EXCEED 60 dB (A) HOURLY AVERAGE. IF THE NOISE ATTENUATION TECHNIQUES IMPLEMENTED ARE DETERMINED TO BE INADEQUATE BY THE QUALIFIED ACOUSTICIAN OR BIOLOGIST, THEN THE ASSOCIATED CONSTRUCTION ACTIVITIES SHALL CEASE UNTIL SUCH TIME THAT ADEQUATE NOISE ATTENUATION IS ACHIEVED OR UNTIL THE END OF THE BREEDING SEASON (AUGUST 16).

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

B. IF COASTAL CALIFORNIA GNATCATCHERS ARE NOT DETECTED DURING THE PROTOCOL SURVEY, THE QUALIFIED BIOLOGIST SHALL SUBMIT SUBSTANTIAL EVIDENCE TO THE CITY MANAGER AND APPLICABLE RESOURCE AGENCIES WHICH DEMONSTRATES WHETHER OR NOT MITIGATION MEASURES SUCH AS NOISE WALLS ARE NECESSARY BETWEEN MARCH 1 AND AUGUST 15 AS FOLLOWS:

   i. IF THIS EVIDENCE INDICATES THE POTENTIAL IS HIGH FOR COASTAL CALIFORNIA GNATCATCHER TO BE PRESENT BASED ON HISTORICAL RECORDS OR SITE CONDITIONS, THEN CONDITION A.III SHALL BE ADHERED TO AS SPECIFIED ABOVE.

   ii. IF THIS EVIDENCE CONCLUDES THAT NO IMPACTS TO THIS SPECIES ARE ANTICIPATED, NO MITIGATION MEASURES WOULD BE NECESSARY.

The City of San Diego's Multiple Species Conservation Program (MSCP) Multi-Habitat Planning Area (MHPA) surrounds the Project site on three sides. Developed areas within Project impact areas and the MHPA total 0.039 acres, and disturbed land within Project impact areas and MHPA total 0.001 acres. Both areas are highly anthropogenically altered lands, which are generally undesirable for inclusion into the MHPA. It is presumed that MHPA mapping was not intended to capture these two locations, but rather a function of the coarseness when digitizing the MHPA. Therefore, the Project proposes to remove these two areas from the MHPA via a boundary line correction.

The proposed Project has been designed to ensure compliance with the City's MSCP. It would also comply with the City's Whitebook, which further avoids and minimizes impacts on biological resources. In accordance with the programmatic mitigation analysis for the PLWTP Master Plan EIR, standard biological resource protection measures during construction have been incorporated into the Project-specific mitigation, monitoring, and reporting program in Section VI of this Addendum.

Based on the foregoing analysis and information, there is no evidence that the Project would

require a major change to the EIR. The Project would not result in any new significant impact, nor result in a substantial increase in the severity of impacts from that described in the EIR.

Geology/Soils

Point Loma Wastewater Treatment Plan Master Plan EIR

Geotechnical (geology/soils) conditions at the PLWTP were evaluated from January to April 1995 by Southland Geotechnical Consultants (SGC), using information compiled from existing geotechnical literature and maps as well as geotechnical investigation reports for various PLWTP facilities. The geotechnical conditions evaluated by SGC included geologic hazards, soil engineering properties, and on-site pedologic characteristics. Mineral resource zonation literature was also consulted to evaluate the presence of potential aggregate resources in the project area. The PLWTP Master Plan EIR provided the determinations listed below regarding geology/soils.

Slope Stability: The Point Loma and Cabrillo Formations are generally not prone to deep-seated slope instability in properly engineered slopes. As individual grading plans are developed for the master plan projects, the project's geotechnical consultant would analyze proposed graded slopes (both fill and cut) to evaluate deep-seated and surficial stability. The slope stability analyses would consider the shear strength characteristics of the soil materials, including fill soil mixtures derived from on-site excavations, as well as on-site geologic conditions, such as the presence of adversely oriented faults, joints, and/or bedding. As necessary, geotechnical recommendations regarding the preparation of areas to receive fill soils would be developed based on site-specific geotechnical evaluations. An evaluation of the suitability of the on-site soils for use as fill would also be made during the site-specific geotechnical studies. In general, the on-site soils appear to be suitable for processing into fill soils; however, oversized materials from concretions in the Point Loma Formation or clasts in the Cabrillo Formation may not be suitable for use as compacted fill and may require off-site disposal or special handling and placement during site grading. Typical design measures to reduce deep-seated slope instability may include excavating slopes at flatter gradients, buttressing, or stabilizing fills. Typical measures to reduce the potential impacts of surficial instability include installing debris catchment walls or fences, flattening slopes, providing for drainage, and planting slope-stabilizing vegetation. Cut slopes and temporary excavations may need to be checked by an engineering geologist for indications of potentially adverse conditions, such as out-of-slope joints or loosely embedded boulders/cobbles. Subsequently, the project's geotechnical consultant may suggest stabilization methods, such as tiebacks or soil nails, if needed.

Unconsolidated Soils: The approximate thickness and distribution of unconsolidated soils can be evaluated by subsurface investigation and geotechnical analysis. Laboratory testing of representative soil samples would be performed as necessary to evaluate their compressibility characteristics. Appropriate design measures for structural/fill areas underlain by compressible soils include removal of the compressible soils to firm natural ground and replacement with properly compacted fill or special foundation designs.

Expansive Soils: The expansion (shrink-swell) potential of on-site soils can be assessed by appropriate laboratory testing of representative soil samples obtained during construction-level geotechnical investigations. Appropriate design measures include grading such that expansive soils

are not placed within the upper 3 feet of the finished pad grade. As an alternative, special reinforced foundations and slabs can be designed to reduce the effects of expansive soils.

Excavatability: Hard concretionary lenses in the Point Loma Formation sedimentary rock occur at the site. In addition, the Cabrillo Formation, as well as fill soils derived from it, may have a relatively high percentage of hard-rock clasts. Hard concretions and potentially numerous clasts may present excavation difficulties during grading and construction activities at the site.

Seismic Shaking: Project-specific evaluations of potential seismic shaking would be performed as necessary for individual projects at the site. The effects of seismic shaking would be reduced by adhering to the most recent edition of the Uniform Building Code and the current design parameters of the Structural Engineers Association of California, as appropriate for the level of seismic shaking anticipated for the site.

The PLWTP Master Plan EIR determined that construction of the facilities may aggravate slope stability, erosion, and unconsolidated soil conditions at the project site; however, because appropriate recommendations from geotechnical design studies would be included in design and construction, and the master plan projects would be designed and constructed in accordance with a properly engineered grading and drainage plan, significant impacts are not expected.

General measures for slope stability, erosion, and unconsolidated soil conditions were identified in the PLWTP Master Plan EIR. The three projects that were addressed at a project-specific level in the PLWTP Master Plan EIR (i.e., the NSPI, the HOG, and the Chemical Feed Systems Upgrade) included design features to address potential geotechnical concerns. It was determined that other projects that would be addressed at a program level in the PLWTP Master Plan EIR would require additional environmental review as development and refinement of the project design occurs. Additional mitigation, with a greater degree of specificity, would be developed for such projects and incorporated into construction plans and specifications. The PLWTP Master Plan EIR determined that until such specific mitigation measures are identified, and their effectiveness evaluated, the potential impacts of the program-level master plan projects would be significant and unmitigated.

Project

The project is located in Geologic Hazard Categories (GHCs) 53, 43, 44, and 12, as shown on the City's Seismic Safety Study Geologic Hazard Maps. GHC 53 is characterized by sloping terrain, unfavorable geologic structure, and variable slope stability. GHC 43 and 44 are characterized by a generally unstable to moderately stable coastal bluff. GHC 12 is a fault buffer zone characterized by potentially active, inactive, or activity-unknown faults with a low to moderate risk.

According to the Geotechnical Report prepared by NOVA Services, Inc. (NOVA Services; March 6, 2024, Appendix B), the site is located adjacent to the Pacific Ocean in the southwest portion of Point Loma, San Diego. The western edge of the plant is located at the top of sensitive coastal bluffs. Grading of the plant was conducted in the 1960's and consisted of constructing a relatively flat pad which required cutting into the hillside east of the PLWTP and filling the western portion of the site.

Over the last 60 years, erosion of some of the bluffs has affected portions of the facility. As a result, the bluffs at the backs of coves received shoreline protective devices and sea caves have been

infilled. The current bluff area is composed of a combination of simple bluffs and modified landform bluffs.

To satisfy the requirements of an MS4 Permit (Disposal of Stormwater Runoff), the plant has proposed to install six wet wells at various locations within the western portion of the plant to collect stormwater. The collected stormwater will be pumped to the eastern portion of the site via new, dedicated storm drain pipelines, so it can be treated and mixed with wastewater. The wet wells will not be occupied except for maintenance (i.e., less than 4,000 man-hours per year). The improvements are not considered crucial to the operation of the plant. The facilities are in their proposed locations because stormwater flows downhill. The locations are at the lowest elevation within their particular drainage basins. They cannot be moved and still function as intended.

Based on the geotechnical analyses performed by NOVA, the proposed facilities will not be adversely impacted by fault ground rupture. There are no active or potentially active faults beneath the proposed vault and wet well sites. The subject faults were exposed in areas that have now been filled or covered in shoreline protection devices. Additionally, the planned construction does not consist of habitable structures. Should an unknown, new fault rupture the proposed facilities, the facilities can be repaired or replaced without affecting the plant operations, which reduces the hazard to insignificance.

The report addended from a 2020 investigation by Atlas (,Appendix C) that indicated the site is not located within an area previously known for significant geologic hazards. Evidence of active faulting, liquefiable soils, or collapsible soils was also not observed during the investigation by Atlas.

The proposed facilities will not adversely affect slope or bluff stability. The proposed facilities are spread over most of the western portion of the plant. Therefore, a bluff top that transverses much of the western portion of the plant was established. The bluffs at the plant range from simple to modified landform bluffs. The depicted bluff top can be considered a hybrid bluff top because of the varying conditions. The Point Loma Formation dips into the slope, and the overlying old paralic deposits are flat-lying. The geologic structure is favorable at the site with respect to slope stability. Slope stability at the site is controlled by slope steepness and bluff erosion. The vault and wet well locations are in areas protected by existing shoreline protection devices or are sufficiently landward of a hybrid top of the bluff.

The coastal buff retreat will not likely impact the proposed facilities due to existing shoreline protection devices. Projected sea level rise may affect the life of the existing shoreline protection devices, but NOVA assumes that the devices will be enhanced over time to protect the essential facilities at the plant, which in turn, will protect the proposed non-essential facilities.

Based on the foregoing analysis and information, there is no evidence that the Project would require a major change to the EIR. The Project would not result in any new significant impact, nor result in a substantial increase in the severity of impacts from that described in the EIR.

Paleontological Resources

Point Loma Wastewater Treatment Plan Master Plan EIR

A paleontological resource investigation concerning the potential for impacts on paleontological resources was prepared by PaleoServices for the PLWTP Master Plan EIR. The PLWTP Master Plan EIR determined that direct impacts on paleontological resources have the potential to occur where earthwork activities cut into the geological deposits (formations) within which fossils are buried. Three main geological formations with moderate to high paleontological sensitivity ratings underlie the project site. If grading activities for any of the master plan projects encounter these formations, there is the potential for impacts on paleontological resources. Detailed grading and development plans for the master plan projects had not yet been prepared in the PLWTP Master Plan EIR; however, a general assessment of the potential for impacts on paleontological resources was completed, based on then-current information regarding the type of geological formation(s) particular to each project. According to the PLWTP Master Plan EIR, if a project is located over a high-sensitivity formation, it can be assumed that there is a high likelihood that the project would encounter paleontological resources, unless and until it is found that (a) project grading would not extend into the formation or (b) there are no resources within the formation area to be graded.

Impacts on paleontological resources from the proposed master plan projects were considered potentially significant because of the known occurrence of well-preserved invertebrates and the possibility of vertebrate remains in each of the geologic formations found on-site. Impacts on high-sensitivity formations (i.e., the Point Loma Formation) were assigned high significance. Impacts on moderate-sensitivity formations (i.e., unnamed marine terrace deposits and the Cabrillo Formation) were assigned moderate significance. Mitigation in the form of paleontological monitoring would be implemented to reduce impacts to less than significant levels.

Project

According to the Geotechnical Report prepared by NOVA Services, Inc. (NOVA Services; March 6, 2024), the site is located adjacent to the Pacific Ocean in the southwest portion of Point Loma, San Diego. The western edge of the plant is located at the top of sensitive coastal bluffs. Grading of the plant was conducted in the 1960's and consisted of constructing a relatively flat pad which required cutting into the hillside east of the plant and filling the western portion of the site. Five different materials were defined to represent the subsurface conditions. The materials include existing fill (Qf), colluvium (Qcol), old paralic deposits (Qop), Point Loma Formation (Kp), and previously placed rip rap (Qr). According to the City's Significance Thresholds for Paleontological Resources, the Point Loma Formation has a high sensitivity rating. Baypoint is broadly correlative with Qop 1-8 of Kennedy and Tan (2008) new mapping nomenclature and is also a high sensitivity rating.

The depth of the proposed Project trenches would range from approximately 2 to 20 feet. The proposed stormwater diversion system would require grading and excavation of an approximately 12,682 square-foot area and the installation of approximately 8-inch to 36-inch diameter stormwater pipe for a total length of 930 linear feet. The Project also includes the installation of 1,240 linear feet of electrical conduit. Grading is anticipated to exceed 1,000 cubic yards.

Since the original EIR was certified, the City of San Diego updated the Municipal Code section 142.0151 Paleontological Requirements for Grading Activities, which states, "Paleontological resources monitoring shall be required in accordance with the General Grading Guidelines for Paleontological Resources in the Land Development Manual for any of the following:

> (1) Grading that involves 1,000 cubic yards or greater, and 10 feet or greater in depth, in a High Resource Potential Geologic Deposit/Formation/Rock Unit; or
> (2) Grading that involves 2,000 cubic yards or greater, and 10 feet or greater in depth, in Moderate Resource Potential Geologic Deposit/Formation/Rock Unit; or
> (3) Grading on a fossil recovery site or within 100 feet of the mapped location of a fossil recovery site."

Paleontological monitoring is required due to the paleontological sensitivity of the site and Project grading depth and volume. As a result, the Project would require a paleontological monitor during grading activities. Standard monitoring requirements would be placed on grading plans and implemented as required pursuant to LDC section 142.0151 (Attachment 3). This measure would ensure potential for impact is below a level of significance.

Based on the foregoing analysis and information, there is no evidence that the Project would require a major change to the EIR. The Project would not result in any new significant impact, nor would it result in a substantial increase in the severity of impacts from that described in the EIR result.

Cultural Resources

Point Loma Wastewater Treatment Plan Master Plan EIR

As discussed in the PLWTP Master Plan EIR, a cultural resource investigation of the project area was completed by Brian F. Mooney Associates in October and December 1994 for the master plan projects. The investigation included a record search for previously reported prehistoric or historic sites and an intensive on-foot survey of the project property. Record searches were obtained from the South Coastal Information Center (SCIC) at San Diego State University and at the San Diego Museum of Man.

Record search efforts completed produced no recorded prehistoric or historic sites within the overall PLWTP site (including the 5-acre Navy parcel at the north end of the plant). The only possible exceptions are Museum of Man site numbers W-161 and W-162, neither of which is a site in the currently accepted archaeological definition. These two site records are far too vague, both in terms of defining physical boundaries and specifying cultural content. In any event, they have been superseded by later, more specific site records.

The PLWTP Master Plan EIR also determined that, although no archaeological resource sites are known to exist within the main PLWTP site, there are several recorded sites in the vicinity of the plant access road. Most of these sites are characterized by shell scatter, with and without lithics. The original project was planned to potentially involve re-engineering the roadway to prevent failure and additional drainage improvements. Due to the program-level review, the PLWTP Master Plan EIR determined additional environmental review was required as the development and refinement of the project design occur. As necessary, additional mitigation, with a greater degree of specificity, would be developed and incorporated into project construction plans and specifications. Until such specific mitigation measures are identified, and their effectiveness evaluated, the potential impacts

of the plant access road improvements were considered significant and unmitigated.

For all other projects, in light of the record search and site survey results, indicating that no archaeological resources are known to occur in or near the PLWTP site, including the 5-acre Navy parcel at the north end of the site, the PLWTP Master Plan EIR determined that no direct impacts were expected to occur from implementation of any of the other master plan projects. The PLWTP Master Plan EIR also determined that the development and visibility of new facilities at the PLWTP could indirectly affect the Cabrillo National Monument.

The PLWTP Master Plan EIR determined that, because no cultural resources, prehistoric or historic, have been recorded on the PLWTP site, nor were any detected during the surface survey, the potential for intact subsurface cultural materials at the plant site is considered to be virtually nonexistent. As such, no direct significant impacts on cultural resources on the project site were expected from the master plan projects. With regard to potential indirect impacts on the Cabrillo National Monument due to the visibility of master plan project components (e.g., the potential for the appearance of project components to conflict with and detract from the historical setting of the Cabrillo National Monument), no significant impacts were expected because the berm proposed as part of the PLWTP Digesters 7 and 8 project would effectively block views. No mitigation measures are required for Master Plan projects other than the Plant Access Road Improvements, because no significant impacts are expected to occur.

Due to the program-level review, the PLWTP Master Plan EIR determined additional environmental review was required as the development and refinement of the project design occurs. Additional mitigation, with a greater degree of specificity, will be developed and incorporated into project construction plans and specifications as necessary. Until such specific mitigation measures are identified, and their effectiveness evaluated, the potential impacts of the project are considered to be significant and unmitigated. The PEIR concluded that cumulative impacts were significant and unmitigated.

Project

An Archaeological Resources Report Form was prepared by ICF in August 2023 (Appendix D). The report indicated that no archaeological resources were identified in the background research or during the pedestrian survey of the Project area. Most of the recorded prehistoric resources identified within the vicinity of the Project area are shell scatters with few or no other artifacts.

The area to the south below PLWTP to the tip of Point Loma contains an almost unbroken string of prehistoric archaeological sites along the edge of the coastal bluffs. Therefore, it is likely that similar archaeological sites were once present within the Project area prior to the development of the PLWTP. As such, the Project area is considered to have had high archaeological sensitivity prior to construction of the PLWTP, and it is possible that intact archaeological deposits may still be present under pavement in areas where mass grading and excavation did not take place during construction of the PLWTP. An archaeological monitor and Native American monitor are recommended for ground disturbance in native soils.

The findings of this report are consistent with the program-level findings of the PLWTP Master Plan EIR. Due to the program-level review, the PLWTP Master Plan EIR determined additional environmental review would be required as the development and refinement of the project design

occurs. Mitigation measures have been developed and incorporated into Section VI of this addendum as necessary.

Based on the foregoing analysis and information, there is no evidence that the Project would require a major change to the EIR. The Project would not result in any new significant impact, nor would it result in a substantial increase in the severity of impacts from that described in the EIR result.

Traffic Circulation and Parking

Point Loma Wastewater Treatment Plan Master Plan EIR

Linscott, Law & Greenspan, Engineers (LLG) conducted a traffic impact analysis for the master plan projects. The following is a summary of the traffic impact analysis completed for the PLWTP Master Plan EIR.

Roadways in the project area that could be affected by the construction of the master plan projects include Nimitz Boulevard, Chatsworth Boulevard, Rosecrans Street (State Route [SR] 209), Cañon Street (SR 209), Catalina Boulevard, Cabrillo Road, and Gatchell Road. Access to the PLWTP site would be provided via Catalina Boulevard. The access route would continue past the military gate to Cabrillo Memorial Drive, to Cabrillo Road, to Gatchell Road, and to the plant entrance gate.

LLG performed a level-of-service (LOS) analysis for the proposed master plan projects. The LOS analysis determined that all street segments operate at LOS D or better, which is considered to be an acceptable LOS, with the exception of two segments. Catalina Boulevard south of Chatsworth Boulevard and Chatsworth Boulevard east of Catalina Boulevard were found to both operate at LOS F; however, it was determined that these LOS ratings do not accurately reflect the actual traffic flow characteristics in the area because there are few traffic signals along Catalina Boulevard and Chatsworth Boulevard and traffic generally does not need to stop.

The traffic impact analysis determined that three key intersections, Cañon Street/Rosecrans Street, Cañon Street/Catalina Boulevard, and Chatsworth Boulevard/Catalina Boulevard, all of which operate at LOS B, would be most likely to be affected.

Existing, Local Transportation Systems

It was determined that three specific projects (NSPI, the HOG Project, and the Chemical Feed Systems Upgrade), along with other master plan projects to be under construction at the same time, may result in potentially significant impacts on the existing local transportation system. The traffic impact analysis in the PLWTP Master Plan EIR determined that peak traffic generation (i.e., average daily traffic [ADT] of 400) would be well below the threshold of 1,000 ADT. The PLWTP Master Plan EIR states that project construction during the peak construction period would add only a small amount of traffic to the nearby roadways, and existing operational characteristics would remain unchanged. As such, it was determined that no significant impacts would occur, and no mitigation measures would be necessary. The following operational enhancements were included as project features to minimize impacts:

- MWWD shall include requirements within project construction contracts that encourage construction traffic to use Rosecrans Street and Cañon Street to access the site and avoid Chatsworth Boulevard and Catalina Boulevard north of Cañon Street.
- MWWD shall include requirements within project construction contracts that (1) promote a

construction employee shift time of approximately 6:30 a.m. to 3:30 p.m. during construction, as currently planned, and (2) require carpooling.

Circulation and Existing Public Access to Parking at Open Space Areas

Catalina Boulevard to Cabrillo Memorial Drive is the only route to the Cabrillo National Monument and Point Loma tide pools. The traffic impact analysis in the PLWTP Master Plan EIR determined that construction traffic during the peak construction period would add a relatively small amount of traffic to these roadways and would not result in notable impacts on the existing operational characteristics of local roads and intersections. The additional traffic was not expected to be perceptible to the patrons of these recreational areas but may be noticeable to local residents, workers, and other regular/frequent users of the local circulation system. However, it was determined that project traffic would not be perceptible to users of the Cabrillo National Monument, and access to these areas would not be affected.

Alterations, if any, to existing circulation movements due to project construction traffic were found to be incremental and not significant. As such, it was determined that no significant impacts would occur, and no mitigation measures would be necessary.

Parking at the PLWTP

A significant parking shortage was anticipated during the peak construction period; the following mitigation measures were included in the PLWTP Master Plan EIR to compensate for the on-site parking shortage and reduce potential parking impacts to a level less than significant:

- MWWD will develop a program to provide sufficient off-site parking to offset any on-site parking shortfall. One likely off-site parking location is the Robb Field athletic area in Ocean Beach. The subject facility has a parking area with more than 200 spaces. The demand for parking at Robb Field is very low during weekday hours, and the facility's schedule would be very compatible with the construction schedule for the PLWTP (i.e., 6:30 a.m. to 4:20 p.m.). A shuttle program would be implemented from the off-site parking location to the project site.

  Development and implementation of an off-site parking program shall be required in conjunction with the review of construction program plans for individual PLWTP projects. As the construction program specifications of each project are determined, including construction parking area needs, the total parking needs and provisions at the PLWTP site shall be assessed. This assessment will include parking needs for plant operations and for all construction activities anticipated to occur concurrently. If it is determined that off-site parking is necessary to meet the total parking requirements of plant activities, the specific provisions for an off-site parking and shuttle program shall be identified in the construction plans and specifications for the project. The parking needs assessment and resultant recommendations shall be subject to DSD review and approval prior to issuance of grading or building permit.

Project

The Project is consistent with the land use/zoning and would not result in additional trips beyond that identified in the PLWTP Master Plan EIR. Since certification of the PLWTP Master Plan EIR, SB 743, which became effective July 1, 2020, updated how transportation impacts are evaluated under CEQA. Specifically, Public Resources Code Section 20199, enacted pursuant to SB 743, identifies VMT as the appropriate metric for measuring transportation impacts along with the elimination of auto

delay/level of service (LOS) for CEQA purposes statewide. Since SB 743 became effective after the approved entitlements, VMT was not discussed in the PLWTP Master Plan EIR.

Currently, the City's CEQA Guidelines require a discussion in relation to whether a project would result in VMT exceeding thresholds identified in the City of San Diego 2022 Transportation Study Manual (TSM). The TSM indicates that the Project is a Locally Serving Public Facility, which includes passive public uses such as water sanitation and utility buildings. The Project is also a "Small Project" as defined in the TSM as a project under 300 Average Daily Trips (ADT). At its peak during construction, the estimated maximum number of trips is 50 ADT. Therefore, the Project is screened out from the requirement to provide a VMT Transportation Analysis. The Project would not have a significant VMT impact, and no Transportation Analysis or mitigation is required.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The Project would not result in any new significant impact, nor would it result in a substantial increase in the severity of impacts from that described in the EIR result.

Air Quality

Point Loma Wastewater Treatment Plan Master Plan EIR

The PLWTP Master Plan EIR did not identify any potential significant air quality impacts. It determined that there are no sensitive receptors with respect to air pollutant emissions in the vicinity of the PLWTP; however, the PLWTP Master Plan EIR did discuss that the Cabrillo National Monument could be considered a sensitive receptor in the unique sense that the aesthetic characteristics of the park area are a major feature that draws approximately 1.7 million visitors per year.

The PLWTP Master Plan EIR states that the development of the master plan projects would have only construction-related emissions and no operational emissions. Fugitive dust emissions would occur at and around the bluff-top areas, particularly in fill areas that would be excavated east of the proposed tied-back wall, and at the parking/staging area to the northeast, which may be used for stockpiling the excavated fill materials. The debris pile and shingle beach to be excavated at the base of the cove, as well as the sacrificial bench materials, are not expected to be notable sources of fugitive dust because of their high moisture content and low percentage of dry, fine particles. In addition, the PLWTP Master Plan EIR determined that the master plan projects are not expected to conflict with the Clean Air Act and policies set by the San Diego Air Pollution Control District (SDAPCD). The only air pollutant emissions associated with all master plan projects would occur from construction activities. Emissions would be evaluated and controlled through SDAPCD permitting requirements and U.S. Environmental Protection Agency emission factor data. Projects addressed at a project-specific level in the PLWTP Master Plan EIR were determined to have construction and operational emissions; however, emissions would not exceed the significance threshold, and no significant impacts would occur.

As noted in the PLWTP Master Plan EIR, projects that are addressed at a program-level of analysis require additional environmental review as refinement of the project design occurs to determine project construction emissions. Identified projects with low-intensity, short-term construction activities are not expected to generate significant emissions. Construction specifications regarding the operational characteristics of the grading and construction equipment to be used were not known at the time that the PLWTP Master Plan EIR was prepared; hence, quantification of

construction equipment emissions was not possible.

Mitigation measures are not required for the master plan project-level and program-level projects because no significant impacts are expected to occur.

Project

The proposed Project intends to replace existing storage manholes with package duplex submersible pumps in new wet wells. The stormwater improvements proposed are not anticipated to generate significant emissions that would contribute to or exceed ambient air quality standards or a significant amount of fugitive dust. Consistent with the conclusions in the EIR, any construction-related air quality impacts may be cumulatively significant. However, current air quality standards, heavy construction machinery, and standard construction practices are improved to meet stricter standards than those in 1994 and CARB's In-Use Off-Road Diesel Fueled Fleets Regulation. Construction would be short-term, and construction emissions would be well less than applicable thresholds. Temporary construction equipment emissions would be minimized through the implementation of standard construction practices and Whitebook standards (e.g., reduction of idling, dust abatement, and use of equipment compliant with modern standards). Therefore, impacts from the proposed Project construction would be less than significant, and no Project-specific mitigation would be required.

Once operational, the Project would not be a stationary source of particulate matter or any other toxic air contaminants. Therefore, the operation of the Project would not expose sensitive receptors to substantial levels of pollution, and impacts would be less than significant. No mitigation is required.

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the EIR. The Project would not result in any new significant impact, nor would it result in a substantial increase in the severity of impacts from that described in the EIR result.

Noise

Point Loma Wastewater Treatment Plan Master Plan EIR

As discussed in the PLWTP Master Plan EIR, the City, through the Transportation Element of the City General Plan, has identified sound levels that are compatible with various land uses. The maximum acceptable sound level is 65 A-weighted decibels (dBA), community noise equivalent level (CNEL), for residential development and 75 dBA CNEL for cemeteries, commercial, industrial, and manufacturing facilities. This standard is typically applied to transportation noise sources such as roadways, railroads, and aircraft operations.

Fixed-source and/or operational noise is governed by the City Noise Ordinance, Section 59.5.0401. The applicable sound level is a function of the time of day and land use zone. Sound levels are measured at the property line of the noise source. The area of the PLWTP is zoned "Public Utilities" and thus may be considered similar to a manufacturing plant.

Testing was performed in two phases to ascertain the existing noise environment present in the vicinity of the master plan projects. Eight sensitive receptor locations near or on the treatment plant

grounds were identified for ambient noise monitoring and measuring as part of a series of 1-hour sound measurements during daytime hours (8:00 a.m. to 5:00 p.m.). Noise produced by plant operation was primarily from large exposed electric motors, pumps, mechanical screen assemblies and associated conveyor systems, intake and exhaust fans, vehicle activity, and the intercom system. The highest noise level was from the blowers; this occurs along the eastern property edge. The measured value of 77 dBA at 19 feet from the source was found to be not significant because of the extreme topographic conditions present at the site (i.e., ocean boundary on the western edge and steep cliffs on the eastern edge). Noise generated by this source was minimized and, therefore, would not affect adjacent lands. Noise levels monitored at Fort Rosecrans National Cemetery were 59 dBA along the top of the slope. This monitoring location had a direct line of sight to most of the plant, including the blowers. Because of the amount of attenuation provided by the existing topography and structures, the potential for existing noise to exceed acceptable levels was found to be limited. The PLWTP Master Plan EIR determined that the noise levels for existing operations would not exceed the City's noise standards.

Construction and operation of the master plan projects, both at a project-specific and program-specific level, would not be expected to produce noise levels that would exceed the City's established noise standard of 75 dBA per 12-hour time interval. The PLWTP Master Plan EIR determined that there would not be a significant increase in noise levels and the overall project contribution to the noise environment would be minimal. No significant noise impacts were anticipated, and no mitigation measures were required.

Project

Construction is not expected to exceed noise thresholds identified in the PLWTP Master Plan EIR, and operational noise would be similar to operational noise from components already present at the site. Activities introduced by the Project would be similar in nature to activities that already take place on the site, such as wastewater treatment and transportation activities. It is not expected that the proposed Project would result in any significant noise levels that would exceed the City's noise standards. Therefore, impacts would be less than significant, and no mitigation would be required. Additional analysis of the impacts of the Project on biological noise receptors is discussed in the Biology section.

Based on the foregoing analysis and information, there is no evidence that the Project would require a major change to the EIR. The Project would not result in any new significant impact, nor would it result in a substantial increase in the severity of impacts from that described in the EIR result.

Human Health and Public Safety

Point Loma Wastewater Treatment Plan Master Plan EIR

The PLWTP Master Plan EIR states that the PLWTP would use several types of hazardous materials for wastewater treatment processes, plant operations, facility maintenance, and laboratory operations (i.e., wastewater quality testing). The most notable of such materials are ferric chloride, sodium hydroxide and hydrogen peroxide, anhydrous ammonia, miscellaneous gases, metal solutions, lubricating oil, and solvents.

The transport, storage, and use of hazardous materials on-site are regulated by federal, state, and

local regulations. In accordance with state and local requirements, a Hazardous Materials Business Plan was prepared and is available on-site for use in an emergency, including use by fire department personnel in responding to any hazardous materials incidents on-site. The Hazardous Materials Business Plan includes a listing of all hazardous materials stored and used on-site, the nature and location of hazardous materials storage facilities, a description of procedures for responding to hazardous materials spills or other incidents on-site, a delineation of evacuation routes, and a list of key contacts in the event of an emergency. On-site personnel are trained in safety procedures and requirements. The PLWTP Master Plan EIR determined that compliance with hazardous materials regulations, in conjunction with overall safety management at the PLWTP, would serve to minimize any existing potential risk to human health and safety and the potential for accidental release. It was found that implementation of the maintenance building and warehouse project would have a beneficial impact with respect to human health and public safety because it would replace older maintenance facilities with new facilities that include provisions for the safe storage and handling of hazardous substances.

As noted in the PLWTP Master Plan EIR, expansion of the PLWTP capacity from 219 MGD to 240 MGD would result in increased use of wastewater treatment chemicals and other process-related chemicals used/consumed at the plant. In general, the increase in annual consumption of chemicals would be proportional to the increase in treatment capacity, which is approximately 10 percent. The increase would include all chemicals that are currently used at the plant, where there are systems in place for their storage, handling, and application. The incremental increase in chemical demands at the plant was not expected to significantly affect the existing safety of chemical transport to the site. The PLWTP Master Plan EIR determined that no mitigation measures were necessary because no significant impacts were expected to occur.

Project

The proposed Project intends to replace existing storage manholes with package duplex submersible pumps in new wet wells, which is not anticipated to result in an increase in chemical usage. Impacts on human health and public safety would be similar impacts under the master plan projects, as identified in the PLWTP Master Plan EIR. The Project would comply with hazardous materials regulations, in conjunction with overall safety management, to minimize any potential risk. The purpose of the Project is to protect health and the environment by reducing pollution entering the ocean. Impacts would be less than significant, and no mitigation would be required.

Based on the foregoing analysis and information, there is no evidence that the Project would require a major change to the EIR. The Project would not result in any new significant impact, nor would it result in a substantial increase in the severity of impacts from that described in the EIR result.

Hydrology/Water Quality

Point Loma Wastewater Treatment Plan Master Plan EIR

The hydrology/water quality technical report prepared by Hirsch & Company dated March 1, 1995 conducted for the project focused on the impact associated with the ultimate implementation of the PLWTP Master Plan (i.e., construction of all of the master plan elements). The most notable hydrology impacts are related to the increase in impervious surfaces; however, the PLWTP Master Plan EIR determined existing drainage capacity is sufficient to accommodate increased runoff.

The PLWTP Master Plan EIR states that several process and laboratory chemicals, as well as petroleum products, are used and stored on-site. However, any spillage from outdoor chemical storage tanks would be diluted with plant effluent in the ocean outfall, and the discharge would be subject to the PLWTP's National Pollutant Discharge Elimination System (NPDES) discharge permit. In addition, a Hazardous Materials Business Plan would be maintained at the PLWTP and include an Emergency Response Plan with emergency procedures for minor and major spills. The business plan was last updated in July 1992 and is considered to be current for and applicable to the existing nature of hazardous materials stored/used on-site.

As discussed in the PLWTP Master Plan EIR, runoff on the project site is discharged through five pipes, along with a brow ditch and sheetflow onto the cliff overhang to the Pacific Ocean. Surface runoff would result from rain falling on pavement and buildings, disturbed and undisturbed soil, equipment, fueling areas, chemical and waste storage areas, and material stockpiles. The quality of surface runoff would be influenced by the activities and control measures practiced on-site. The potential for chemicals to enter stormwater runoff was considered a significant impact; however, implementation of a Stormwater Pollution Prevention Plan (SWPP) and a Spill Prevention, Control, and Countermeasure (SPCC) Plan would mitigate potential water quality impacts.

Because construction activities occur regularly at the PLWTP, the PLWTP Master Plan EIR determined that these activities may degrade the quality of surface runoff if control measures are not undertaken. In addition, sedimentation and erosion have occurred naturally along the cliffs of the PLWTP. As such, potential sedimentation and erosion impacts were evaluated and determined to most likely be reduced through control measures implemented during construction activities. However, until such control measures are specified as part of more detailed improvement plans, impacts would be potentially significant. The PLWTP Master Plan EIR states that additional mitigation, with a greater degree of specificity, would be developed and incorporated into project construction plans and specifications. However, until such specific mitigation measures are identified, and their effectiveness evaluated, impacts would be significant and unmitigated.

The following mitigation measures were included to be implemented on a project-by-project basis to reduce impacts to less-than-significant levels:

1. Project-specific design and engineering plans for master plan elements that add impervious surfaces shall include provisions to ensure that runoff is directed to appropriate drainage facilities.
2. The following types of sedimentation and erosion control measures will be considered and incorporated into project construction plans and specifications, as appropriate:
    - Natural drainageways should be used whenever possible. Runoff should be directed away from denuded areas, especially during construction. Maintain runoff water in its natural course and direction of flow whenever possible.
    - Minimize runoff velocities with energy dissipators such as straw bale check dams (temporary) and riprap (permanent). Prepare drainageways and outlets to handle concentrated runoff with straw bale dikes, erosion control blankets (e.g., coconut fiber), soil binders, and/or temporary down drains until permanent drainage structures are constructed.

- When used as check dams and sediment traps, straw bales are placed lengthwise and end to end, perpendicular to the contour of the slope. The maximum spacing of check dams along the drainageway is such that the toe of the upstream dam is at the same elevation as the top of the downstream dam. It is not recommended to use straw bales for drainage areas exceeding 2 acres. Straw bales can also be used as temporary dikes at the top of slopes to divert runoff off exposed slope faces to temporary down drains.
- Temporary down drains may simply be earthen channels protected with impermeable liners (plastic or rubber sheeting) or galvanized flumes that discharge to natural drainageways, with energy dissipation such as riprap provided at the outlet. Earthen stockpiles used during construction would be covered with tarps before forecasted rainfall. Completed grading and excavation work would be protected with temporary soil binders and/or a hydraulically applied bonded fiber matrix before forecasted rainfall.
- Silt fencing can control the transport of sediment into drainageways during construction activities. Silt fences would be installed carefully along the contour at the base of cut-and-fill slopes. Placement along the contour prevents channeling and the concentrating of stormwater runoff and allows water to permeate evenly along the fence line. Several silt fence manufacturers produce pre-assembled silt fencing (with the fabric attached to the posts), which comes in rolls. This type of preassembled silt fencing is quick and easy to install.
- Silt fencing should be inspected prior to forecasted rainfall and reinspected as soon as possible after rainfall. The filter fabric is inspected for tearing. Sediment trapped by the silt fence is then removed and properly disposed.
- Along access road grading sties, sandbags and/or gravel bags can be placed as needed to trap sediment and channel runoff to natural drainageways. Gravel bags may have a longer useful life than sandbags.
- Erosion control measures should be timed appropriately. During construction activity in the rainy season (October 1 to April 30), temporary erosion control measures should be in place within 10 days of soil disturbance.
- Inspections of temporary erosion control measures should be conducted before a storm having a probability of occurrence of 40 percent or greater. The probability of storm occurrence can be determined by monitoring weather forecasts with a marine radio. A post-storm inspection should be performed as soon as possible after the rainfall event.
- For permanent soil stabilization of the construction site, disturbed soil is revegetated with an appropriate grassland seed mix to be applied with a hydromulch process. Before hydromulching, the soil surface is scarified to promote contact. The hydromulch mix may include seed mix, fertilizer, wood fiber or recycled paper mulch, straw, soil tackifier, and/or a hydraulically applied bonded fiber matrix. Fertilizer requirements would be determined after analysis of representative soil samples for pH, nitrogen, phosphorus, and potash.

Project

The Project proposes improvements to existing stormwater drainage facilities to divert the run-off on-site to be treated before entering the Pacific Ocean. Per the “Hydrology and Hydraulics Validation Study for the Point Loma Wastewater Treatment Plant Storm Water Diversion Project” (HDR,

September 2023, Appendix E, the City of San Diego entered a Consent Decree with San Diego Coastkeeper and Coastal Environmental Rights Foundation in November 2018, which outlines obligations to reduce pollutant concentrations in storm water discharged from Point Loma Wastewater Treatment Plant (PLWTP) to below specific numeric levels. Based on preliminary analysis, the City of San Diego decided to capture and route storm water discharges to the PLWTP headworks for treatment and has requested design assistance from HDR to capture and divert discharges from the PLSD1, PLSD2, PLSD3, PLSD3A, and PLSD4 drainage areas. This design assistance is in accordance with the requirements of the on-site compliance option of the 2018 amendments to the Statewide General Permit for Stormwater Discharges Associated with Industrial Activities (IGP).

Hydrologic and hydraulic analysis was conducted for the PLWTP Stormwater Diversion Project to provide peak discharge and design capture volume (DCV) estimates that will inform the design of stormwater containment facilities required to meet stormwater quality criteria.

The Project is subject to the Clean Water Act, City of San Diego Standard Specifications for Public Works Construction "Whitebook," and City of San Diego Municipal Code regulations which contain standard specifications for grade changes, irrigation, mulch, and disposal procedures that reduce potential for hydrologic and water quality impacts to less than significant. The Project is subject to the Clean Water Act and is required to provide a Water Pollution Control Plan per the Whitebook standards. The Project, as designed, will improve drainage and hydrology conditions in accordance with the Consent Decree. Therefore, the Project would not result in a substantial increase in runoff, substantial alteration of on-site or off-site drainage patterns, or off-site erosion and sedimentation, and impacts would be less than significant.

Additionally, the Project has provided site-specific analysis demonstrating consistency with the City Storm Water Runoff and Drainage Regulations (San Diego Municipal Code Chapter 14, Article 2, Division 2) and the Land Development Manual.

Based on the foregoing analysis and information, there is no evidence that the Project would require a major change to the EIR. The Project would not result in any new significant impact, nor would it result in a substantial increase in the severity of impacts from that described in the EIR result.

VI. EIR MITIGATION, MONITORING, AND REPORTING PROGRAM (MMRP) INCORPORATED INTO THE PROJECT

The findings of this report are consistent with the findings of the PLWTP Master Plan EIR. Due to the program-level review, the PLWTP Master Plan EIR determined additional environmental review will be required as the development and refinement of the project design occurs. Additional avoidance and minimization measures, with a greater degree of specificity, have been developed and incorporated into project construction plans and specifications as necessary.

Biological Resources

Per the PLWTP Master Plan EIR, due to the program-level review, additional environmental review will be required as the development and refinement of the project design occurs. Additional

mitigation, with a greater degree of specificity, will be developed within the framework discussed below. The following would be incorporated as part of this project-level review.

Biological Resource Protection During Construction

I. Prior to Construction

A. Biologist Verification: The owner/permittee shall provide a letter to the City's Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist) as defined in the City of San Diego's Biological Guidelines (2012), has been retained to implement the project's biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project.

B. Preconstruction Meeting: The Qualified Biologist shall attend the preconstruction meeting, discuss the project's biological monitoring program, and arrange to perform any follow up mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.

C. Biological Documents: The Qualified Biologist shall submit all required documentation to MMC verifying that any special mitigation reports including, but not limited to, maps, plans, surveys, survey timelines, or buffers are completed or scheduled per City Biology Guidelines, Multiple Species Conservation Program (MSCP), Environmentally Sensitive Lands Ordinance (ESL), project permit conditions; California Environmental Quality Act (CEQA); endangered species acts (ESAs); and/or other local, state or federal requirements.

D. BCME: The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME), which includes the biological documents in C above. In addition, include: restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, burrowing owl exclusions, etc.), avian or other wildlife surveys/survey schedules (including general avian nesting and USFWS protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/ barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City ADD/MMC. The BCME shall include a site plan, a written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule. The BCME shall be approved by MMC and referenced in the construction documents.

E. Avian Protection Requirements: To avoid any direct impacts to California Gnatcatcher and any avian species that is listed, candidate, sensitive, or special status in the MSCP, removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species (February 1 to September 15). If the removal of habitat in the proposed area of disturbance must occur during the breeding season, the Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of nesting birds in the proposed area of disturbance. The pre-construction survey shall be conducted within three (3) calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the pre-construction survey to City DSD for review and approval prior to initiating any construction activities. If nesting birds are detected, a letter report in conformance with the City's Biology Guidelines and applicable State and Federal Law (i.e. appropriate follow-up surveys,

monitoring schedules, construction and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report shall be submitted to the City for review and approval and implemented to the satisfaction of the City. The City's MMC Section and Biologist shall verify and approve that all measures identified in the report are in place prior to and/or during construction.

F. Resource Delineation: Prior to construction activities, the Qualified Biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats and verify compliance with any other project conditions as shown on the BCME. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora & fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize the attraction of nest predators to the site.

G. Education: Prior to the commencement of construction activities, the Qualified Biologist shall meet with the owner/permittee or designee and the construction crew and conduct an on-site educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna (e.g., explain the avian and wetland buffers, flag system for removal of invasive species or retention of sensitive plants, and clarify acceptable access routes/methods and staging areas, etc.).

II. During Construction

A. Monitoring: All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on "Exhibit A" and/or the BCME. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas or cause other similar damage and that the work plan has been amended to accommodate any sensitive species located during the pre-construction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR shall be e-mailed to MMC on the 1st day of monitoring, the 1st week of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery.

B. Subsequent Resource Identification: The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna onsite (e.g., flag plant specimens for avoidance during access, etc). If active nests or other previously unknown sensitive resources are detected, all project activities that directly impact the resource shall be delayed until species-specific local, state or federal regulations have been determined and applied by the Qualified Biologist.

III. Post Construction Measures

A. In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL and MSCP, State CEQA, and other applicable local, state and federal laws. The Qualified Biologist shall submit a final BCME/report to the satisfaction of the City ADD/MMC within 30 days of construction

completion.

Cultural Resources

Per the PLWTP Master Plan EIR, due to the program-level review, additional environmental review was determined to be required as development and refinement of the project design occurs. As necessary, additional mitigation, with a greater degree of specificity, would be developed and incorporated into project construction plans and specifications. The following would be incorporated as part of this project- level review.

1. Prior to project implementation, the Applicant will retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology and qualified by the City of San Diego (per Appendix B of the Historical Resources Guidelines) to carry out all mitigation related to cultural resources.

2. An archaeological monitor (working under the direct supervision of the qualified archaeologist) and a Native American monitor should observe all excavation in previously undisturbed sediments. The concern will primarily be with deeper excavation that might encounter the original ground surface beneath any artificial fill, though the fill itself may contain artifacts as well. For this reason, activities that cause only surficial impacts, such as asphalt cutting and vegetation removal, have a low potential for encountering cultural resources and such activities are not recommended for monitoring. The monitoring's main goal will be to determine if archaeological resources are present within the fill or on the intact native ground beneath it.

3. The qualified archaeologist, in coordination with the City and the Native American monitor, may reduce or discontinue monitoring if it is determined that the possibility of encountering archaeological deposits is low based on observations of exposed sediments, and according to the expectations noted above. Archaeological monitoring will be conducted by an archaeologist familiar with the types of archaeological resources that could be encountered within the APE. The monitors will be empowered to halt or redirect project activities away from a discovery until the qualified archaeologist has evaluated the discovery and determined the appropriate treatment.

4. The archaeological monitor will keep daily logs or Consultant Site Visit Records (CSVR) detailing the types of activities and soils observed and any discoveries. After monitoring has been completed, the qualified archaeologist will prepare a monitoring report that details the results of monitoring. The report will be submitted to the City and any Native American groups who request a copy. A copy of the final report will be filed at the SCIC.

5. In the event of the unanticipated discovery of archaeological materials, all work should cease at once within approximately 50 feet of the discovery until it can be evaluated by the qualified archaeologist. Project work should not resume until the qualified archaeologist has conferred with the City on the significance of the resource. The qualified archaeologist and the City should consult with appropriate Native American representatives in assessing prehistoric or Native American resources. If it is determined that the discovered archaeological resource constitutes a historical resource, tribal cultural resource, or a unique archaeological resource under CEQA, avoidance and preservation in place is the preferred

manner of mitigation. Preservation in place may be accomplished by but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement. If preservation in place is demonstrated to be infeasible and data recovery through excavation is the only feasible mitigation available, a Cultural Resources Treatment Plan should be prepared and implemented by the qualified archaeologist in consultation with the City.

6. The Cultural Resources Treatment Plan should provide procedures for the adequate recovery of the scientifically consequential information contained in the archaeological resource. The qualified archaeologist and the City should consult with appropriate Native American representatives in determining treatment for prehistoric or Native American resources to ensure cultural values ascribed to the resources, beyond those that are scientifically important, are considered.

7. If human remains are encountered, all work should halt work in the vicinity (within 100 feet) of the discovery and the City and the San Diego County Coroner should be contacted per PRC Section 5097.98 and Health and Safety Code Section 7050.5. If the County Coroner determines that the remains are Native American, the NAHC should be notified in accordance with Health and Safety Code Section 7050.5, subdivision (c), and PRC Section 5097.98 (as amended by AB 2641). The NAHC would designate a Most Likely Descendant (MLD) for the remains per PRC Section 5097.98. Until the landowner has conferred with the MLD, the City shall ensure that the immediate vicinity where the discovery occurred is not disturbed by further activity, is adequately protected according to accepted cultural or archaeological standards or practices, and that further activities consider the possibility of multiple burials.

VII. SIGNIFICANT UNMITIGATED IMPACTS

The Point Loma Master Plan Environmental Impact Report (EIR) No. 94-0510/SCH No. 94101024 indicated that direct significant impacts to the following issues would be substantially lessened or avoided if all the proposed mitigation measures recommended in the EIR were implemented: paleontology (except drilling), biology (maritime succulent scrub), and traffic. The EIR concluded that significant impacts related to visual, biological, paleontological (drilling-related), cultural, geological, and hydrological resources would not be fully mitigated to below a level of significance. With respect to cumulative impacts, implementation of the EIR would result in significant biology and traffic impacts, which would remain significant and unmitigated.

Because there were significant unmitigated impacts associated with the original project approval, the decision maker was required to make specific and substantiated "CEQA Findings" which stated: (a) specific economic, social, or other considerations which make infeasible the mitigation measures or project alternatives identified in the FEIR, and (b) the impacts have been found acceptable because of specific overriding considerations. Given that there are no new or more severe significant impacts that were not already addressed in the previous certified EIR, new CEQA Findings and or Statement of Overriding Considerations are not required.

The proposed Project would not result in any additional significant impacts, nor would it result in an increase in the severity of impacts from that described in the previously certified EIR.

VIII. CERTIFICATION

Copies of the addendum, the certified EIR, the MMRP, and associated project-specific technical appendices, if any, may be accessed on the City's CEQA webpage at https://www.sandiego.gov/ceqa/final.

Jamie Kennedy
Senior Planner
Engineering & Capital Projects Department

8/20/24
Date of Final Report

Analyst: JAMIE KENNEDY

Attachments:

1. Figure 1: Project Location Map
2. Figure 2: Site Plan
3. City of San Diego Land Development Manual Grading Guidelines for Paleontological Resources

Appendices:

Appendix A: Biological Technical Report (Balk Biological, Inc, 2024)
Appendix B: Geotechnical Addendum and Response to City Review Comments (NOVA, 2024)
Appendix C: Geotechnical Investigation Report (ATLAS, 2020)
Appendix D: Archaeological Resources Report Form (ICF, 2023)
Appendix E: Hydrology and Hydraulics Validation Study (HRD, Inc, 2020)
Appendix F: Climate Action Plan (CAP) Memo for the Point Loma Wastewater Treatment Plant Stormwater Diversion Project (City, 2024)

References:

City of San Diego

2024 Email attachment from Sara McMullen, "Trip Generation Sheet." July 2024.

2022 Transportation Study Manual (TSM), September 19, 2022. https://www.sandiego.gov/sites/default/files/10-transportation-study-manual.pdf

2022 Land Development Code Historical Resources Guidelines, December 14, 2022 https://www.sandiego.gov/sites/default/files/ldmhistorical_dec2022.pdf

2021 Standard Specification for Public Works Construction The "Whitebook" https://www.sandiego.gov/sites/default/files/the_whitebook_2021_edition.pdf

1996 Point Loma Wastewater Treatment Plant Master Plan Environmental Impact Report No. 94-0510/ SCH No. 94-101024

Attachment 1

Aerial Photo: USDA NAIP 2022; Regional Map: National Geographic, Esri 2012

Figure 1

Project Location Map

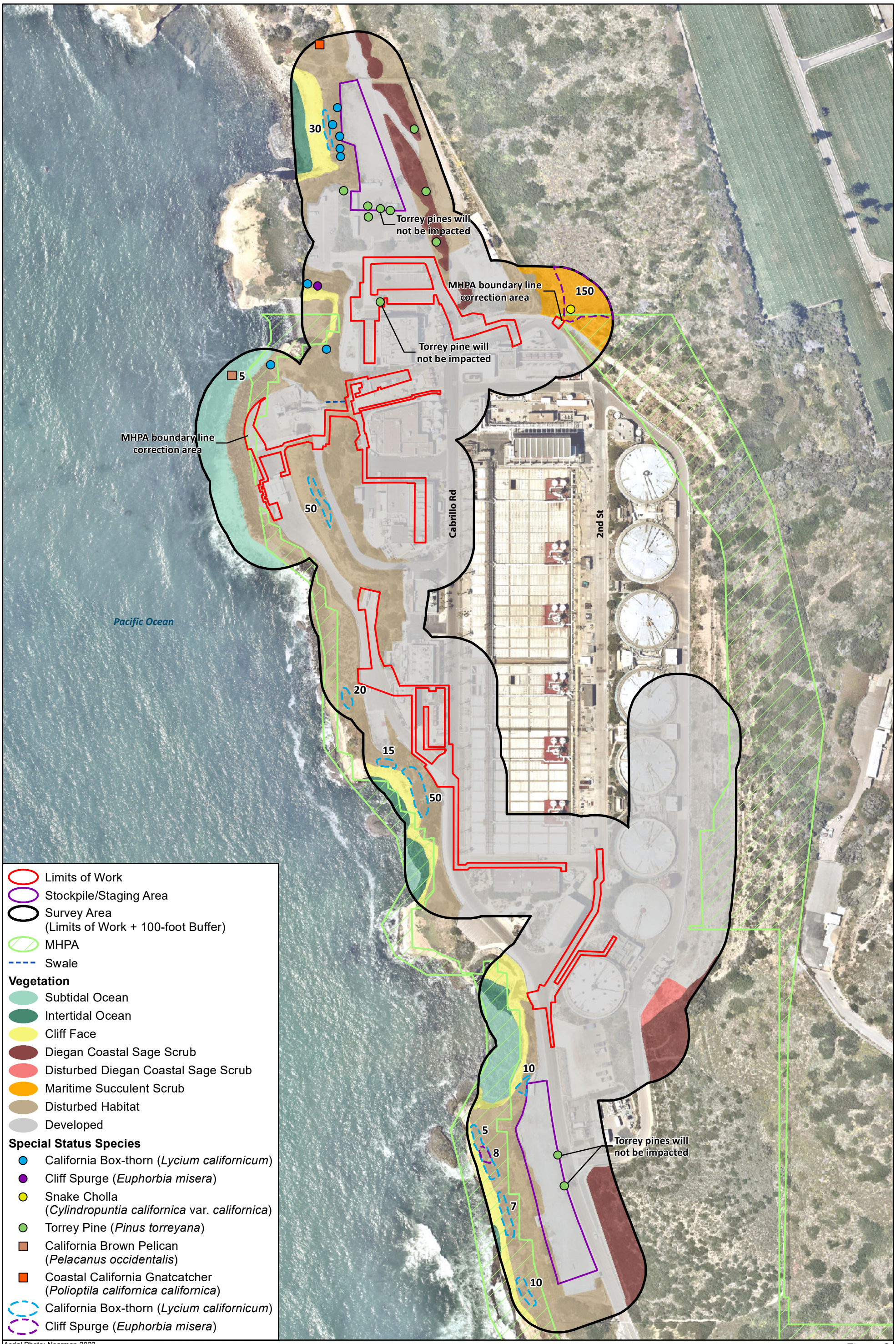
Storm Water Diversion at the
Point Loma Wastewater Treatment Plant

Balk Biological, Inc.

N

0 1,000 Feet

Attachment 2



Aerial Photo: Nearmap 2023

Figure 2

Site Plan

Storm Water Diversion at the
Point Loma Wastewater Treatment Plant

Balk Biological, Inc.

N

0 150 Feet

The following is the standard monitoring requirement that shall be placed on grading plans and implemented when required pursuant to LDC section 142.0151:

I. Prior to Permit Issuance

Entitlements Plan Check

Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the City Engineer (CE) and/or Building Inspector (BI) shall verify that the requirements for Paleontological Monitoring have been noted on the appropriate construction documents.

1. The applicant shall submit a letter of verification to Resident Engineer (RE) and/or Building Inspector (BI) identifying the qualified Principal Investigator (PI) for the project and the names of all persons involved in the paleontological monitoring program. A qualified PI is defined as a person with a Ph.D. or M.S. or equivalent in paleontology or closely related field (e.g., sedimentary or stratigraphic geology, evolutionary biology, etc.) with demonstrated knowledge of southern California paleontology and geology, and documented experience in professional paleontological procedures and techniques.

2. **II. Prior to Start of Construction**

A. Verification of Records Search

1. The PI shall provide verification to RE and/or BI that a site specific records search has been completed. Verification includes, but is not limited to a copy of a confirmation letter from the San Diego Natural History Museum, or another relevant institution that maintains paleontological collections recovered from sites within the City of San Diego.

2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.

B. PI Shall Attend Preconstruction Meetings

1. Prior to beginning any work that requires monitoring, the Applicant shall arrange a Preconstruction Meeting that shall include the PI, Construction Manager (CM) and/or Grading Contractor, RE, and BI, as appropriate. The qualified paleontologist (PI) shall attend any grading/excavation related Preconstruction Meetings to make comments and/or suggestions concerning the Paleontological Monitoring program with the Construction Manager and/or Grading Contractor.

a. If the PI is unable to attend the Preconstruction Meeting, the Applicant shall schedule a focused Preconstruction Meeting with the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.

2. Identify Areas to be Monitored

   Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to RE and/or BI identifying the areas to be monitored including the delineation of grading/excavation limits. The PME shall be based on the results of a site specific records search as well as information regarding existing known geologic conditions (e.g., geologic deposits as listed in the Paleontological Monitoring Determination Matrix below).

3. When Monitoring Will Occur
   a. Prior to the start of any work, the PI shall also submit a construction schedule to the RE and/or BI indicating when and where monitoring will occur.

   b. The PI may submit a detailed letter to RE and/or BI prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents and geotechnical reports which indicate conditions such as depth of excavation and/or thickness of artificial fill overlying bedrock, presence or absence of fossils , etc., which may reduce or increase the potential for resources to be present.

III. During Construction

A. Monitor Shall be Present During Grading/Excavation/Trenching

1. The paleontological monitor shall be present full-time during grading/excavation/trenching activities as identified on the PME that could result in impacts to formations with high and moderate resource sensitivity. **The Construction Manager is responsible for notifying the PI, RE and/or BI of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances OSHA safety requirements may necessitate modification of the PME.**

2. The PI may submit a detailed letter to RE and/or BI during construction requesting a modification to the monitoring program when a field condition such as trenching activities that do not encounter previously undisturbed and paleontologically sensitive geologic deposits as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for paleontological resources to be present.

3. The paleontological monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR's shall be emailed by the CM to the RE and/or BI the first day of monitoring, the last day of monitoring, monthly (**Notification of Monitoring Completion)**, and in the case of ANY discoveries.

B. Discovery Notification Process

1. In the event of a discovery, the paleontological monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and notify the RE and/or BI. The contractor shall also process a construction change for administrative purposes to formalize the documentation and recovery program, including modification to Mitigation Monitoring and Compliance (MMC).

2. The paleontological monitor shall notify the PI (unless paleontological monitor is the PI) of the discovery.

3. The PI shall notify MMC of the discovery, and shall submit documentation to MMC within 24 hours by email with photos of the resource in context.

C. Recovery of Fossils

If a paleontological resource is encountered:

1. The paleontological monitor shall salvage unearthed fossil remains, including simple excavation of exposed specimens or, if necessary as determined by the PI, plaster-jacketing of large and/or fragile specimens or more elaborate quarry excavations of richly fossiliferous deposits.

2. The paleontological monitor shall record stratigraphic and geologic data to provide a context for the recovered fossil remains, including a detailed description of all paleontological localities within the project site, as well as the lithology of fossil-bearing strata within the measured stratigraphic section, and photographic documentation of the geologic setting.

V. Post Construction

A. Preparation and Submittal of Draft Paleontological Monitoring Report

1. The PI shall submit two copies of the Draft Paleontological Monitoring Report (even if negative), prepared to the satisfaction of the Development Services Department. The Draft Paleontological Monitoring Report shall describe the methods, results, and conclusions of all phases of the Paleontological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring,

a. For significant or potentially significant paleontological resources encountered during monitoring, as identified by the PI, the Paleontological Recovery Program shall be included in the Draft Monitoring Report.

b. The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources encountered during the Paleontological Monitoring Program in accordance with the City's Paleontological Guidelines (revised November 2017), and submittal of such forms to the San Diego Natural History Museum and MMC with the Draft Paleontological Monitoring Report.

2. MMC shall return the Draft Paleontological Monitoring Report to the PI for revision or, for preparation of the Final Report.

3. The PI shall submit revised Draft Paleontological Monitoring Report to MMC for approval.

4. MMC shall provide written verification to the PI of the approved Draft Paleontological Monitoring Report.

5. MMC shall notify the RE and/or BI, of receipt of all Draft Paleontological Monitoring Report submittals and approvals.

B. Handling of Recovered Fossils

1. The PI shall ensure that all fossils collected are cleaned to the point of curation (e.g., removal of extraneous sediment, repair of broken specimens, and consolidation of fragile/brittle specimens) and catalogued as part of the Paleontological Monitoring Program.

2. The PI shall ensure that all fossils are analyzed to identify stratigraphic provenance, geochronology, and taphonomic context of the source geologic deposit; that faunal material is taxonomically identified; and that curation has been completed, as appropriate.

C. Curation of Fossil Remains: Deed of Gift and Acceptance Verification

1. The PI shall be responsible for ensuring that all fossils associated with the paleontological monitoring program for this project are permanently curated with an accredited institution that maintains paleontological collections (such as the San Diego Natural History Museum).

2. The PI shall include an acceptance verification from the curation institution in the Final Paleontological Monitoring Report submitted to the RE and/or BI, and MMC.

D. Final Paleontological Monitoring Report(s)

1. The PI shall submit two copies of the Final Paleontological Monitoring Report to MMC (even if negative), within 90 days after notification from MMC that the Final Paleontological Monitoring Report has been approved.

2. The RE and/or BI shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Paleontological Monitoring Report from MMC, which includes the Acceptance Verification from the curation institution.