



# Environmental Impact Report

REVISED 2/96 (Denoted in bold)

DEP No. 94-0510  
SCH No. 94-101024

**SUBJECT:** Point Loma Wastewater Treatment Plant Master Plan. COUNCIL APPROVAL of the North Shoreline Protection Improvement (NSPI) project and Phase I of the Northern Parking Area. This EIR addresses the NSPI project, in addition to the other projects identified in the Point Loma Master Plan, as described in the "Project Description" (Section 3) of the EIR. In addition to the NSPI and Northern Parking projects, the Headworks (HOG) and Chemical Upgrade projects were evaluated at a project-specific level. Eight additional projects were evaluated at a programmatic level; Water Tank/Pipeline, Plant Access Road Improvements, North Operations Building, Parking Facility Improvements, Power Generation and Distribution Upgrade, Maintenance Building and Warehouse Upgrade, Digesters 9 and 10, and Parallel Tunnel Outfall and Tie-In System. The proposed improvements are located on the south western side of Point Loma within and adjacent to the existing PLWTP in the Peninsula Community planning area.

Applicant: City of San Diego,  
Metropolitan Wastewater Department

## BACKGROUND:

A Master Plan was developed in August 1994, by the Metropolitan Wastewater Department (MWW) covering improvements which will enable the build-out of the PLWTP to 240 MGD advanced primary treatment. Proposed improvements are also intended to enhance the efficiency and effectiveness of existing facilities. In addition, the project provides for construction of additional digesters which may be needed in the future. The Master Plan is intended as a "facilities planning report" and has not been proposed for Council adoption. Although design of the various facilities has progressed since the Master Plan was developed. This EIR reflects those changes in the "Project Description" (Section 3). In addition, since this draft EIR was distributed, additional project changes and analysis have occurred. These latter changes involve the

**NSPI and Parking Facility Improvements projects and are addressed in the Addendum.**

The primary purpose of this EIR is to enable assessment of site specific and cumulative impacts of the many individual projects proposed at the PLWTP. While existing or approved projects, or those which are being evaluated in other environmental documents (Digesters 7/8 EIR), are not part of the proposed project, the EIR considers these projects in the evaluation of cumulative impacts. The EIR also addresses system-wide alternatives which may reduce impacts of these facilities.

Council may approve funding to initiate the site-specific projects, whereas additional environmental analysis will be required prior to approving any of the projects evaluated at a program-level.

The California Coastal Commission retains permitting jurisdiction over the PLWTP site. Therefore, in addition to Council approval, the projects will require individual Coastal Development Permits from the Coastal Commission. In addition, some projects included herein, which are on federal property, will require Navy and U.S. Department of the Interior approval and corresponding NEPA review.

#### **CONCLUSIONS:**

These projects may result in significant unmitigated impacts to visual, biological, paleontological (drilling-related), cultural, geological, and hydrological resources. Conceivably, as design for these projects progress, these impacts, with the exception of visual and paleontology (drilling-related) may either be avoided or mitigated. The project could also result in significant unmitigated cumulative impacts in the following areas: visual, biology, paleontology (drilling-related), air quality, and hydrology.

Potentially significant, but mitigated, impacts have been identified for paleontology (except for projects which incorporate drilling (see Unmitigated Impacts), biology (related to maritime succulent scrub), and traffic (related to parking). Biology and traffic would also result in significant, but mitigated, cumulative impacts. [Refer to Addendum, DEP No. 96-0164 for additional discussion regarding parking.]

Project alternatives considered include "No Project", "System Modifications for Digesters 9 and 10", and "Alternative Locations for Digesters 9 and 10". In addition to project alternatives, project options are proposed for the Parking Facility Improvements (See Section 3).

Unless mitigation measures or project alternatives are adopted, project approval will require the decision-maker to make Findings, substantiated in the record, which state that: a) individual mitigation measures or project alternatives are infeasible, and b) the overall project is acceptable despite significant impacts because of specific overriding considerations.

#### **SIGNIFICANT IMPACTS AND RECOMMENDED MITIGATION:**

Paleontology: All of the proposed Master Plan projects would extend into either the Point Loma Formation which has a high level of paleontological

sensitivity or the Cabrillo or unnamed marine formation which has a moderate level of sensitivity. A paleontological monitoring and mitigation program would be implemented to reduce impacts to below a level of significance (See Section 4.4). This program cannot, however, be implemented for drilling activities.

Traffic: A parking shortfall of 70 spaces during the peak construction period is projected to occur, thereby resulting in a significant traffic impact. Parking at Robb Field in combination with a shuttle service is planned to accommodate this additional parking need, and fully mitigates this impact. [See Addendum, DEP No. 96-0164 for further discussion of this issue.]

**CUMULATIVE IMPACTS (MITIGATED):**

Traffic: The impact noted previously related to the parking shortfall, would also result in a cumulative impact. Mitigation would be provided as noted above.

**UNMITIGATED IMPACTS:**

Visual Resources: One of three proposed site-specific projects (HOG) and seven of eight projects evaluated at a program-level (all but the Maintenance Building and Warehouse Upgrade) would result in significant unmitigated visual impacts, primarily to views from the west (ie; from the ocean). In addition, significant unmitigated visual impacts on visitors to Cabrillo National Monument would result as a consequence of the proposed Southwest Parking Facility.

Paleontology: The project-specific HOG project and any of the program-level projects which involve deep drilling of concrete piers could result in potentially significant unmitigated impacts to paleontological resources.

Cultural Resources: Archaeological resource sites exist south of the PLWTP which could be impacted by the proposed Plant Access Road Improvements. This project may involve re-engineering the roadway to prevent failure and additional drainage improvements. Until avoidance/reduction measures are developed, potential impacts are considered significant and unmitigated.

Biology: Two of the eight PLWTP projects (Water Tank/Pipeline and Plant Access Road Improvements) which are addressed at a program-level of analysis could have significant impacts on biological resources. Although project design is intended to avoid impacts to maritime succulent scrub (MSS), the potential remains for direct and/or indirect impacts to maritime succulent scrub. It is anticipated that any impacts to MSS would be mitigated at a ratio of 3:1 via options as discussed under Biology (Section 4.2). However, until the potential loss of MSS is quantified and a mitigation approach developed, the impact is considered significant and unmitigated. The Parallel Tunnel Outfall and Tie-In would impact marine resources through increasing turbidity and sedimentation. This impact is also considered significant and unmitigated until impacts are further evaluated and mitigation measures stipulated.

The loss of MSS, which is a type of coastal sage scrub, is not expected to conflict with Section 4(d) of the federal Endangered Species Act. (Please refer to Section 4.2.2.2.1 for specific 4(d) findings for this project). None of the three project-specific projects would impact MSS. The future

implementation of individual projects would require 4(d) findings to be made, either in accordance with the Interim 4(d) process currently in effect or the Multiple Species Conservation Program ultimately adopted by the City, depending upon the timing of each project.

Geology/Soils: All eight of the program-level projects are assumed to have unmitigated geotechnical impacts (slope instability, erosion, unconsolidated soils, expansive soils, seismic shaking, and coastal bluff retreat) until project-specific mitigation measures are developed.

Hydrology: Increases in erosion, sedimentation, and surface water pollutants are expected to occur during construction of these projects. These impacts are considered significant and unmitigated until specific control measures are identified, reviewed, and implemented.

**CUMULATIVE IMPACTS (SIGNIFICANT UNMITIGATED):**

Visual: There would be significant unmitigated cumulative short-term impacts to public views toward the PLWTP from the south (Cabrillo National Monument) and, both, short- and long-term impacts to views from the west (from the ocean). [See Addendum, DEP No. 96-0164.]

Biology: Cumulative projects would contribute to the removal of maritime succulent scrub. These impacts would arise primarily from the proposed Digesters 7 and 8 project, in addition to the Water Tank and Pipeline and Access Road Improvements projects discussed above. As previously noted, it is anticipated that impacts would be defined and mitigation proposed as the project evolves.

Significant unmitigated biological impacts would result as a consequence of construction-related activities. These impacts from erosion and run-off would temporarily affect water quality and, hence, intertidal resources. In addition, construction noise, dust, and human activity may impact local wildlife.

Paleontology: Potential unmitigated cumulative impacts for Master Plan projects requiring drilling activities to support structural foundations would occur.

Air Quality: Construction-related air quality impacts would be cumulatively significant and unmitigated.

Hydrology: Short-term, construction-related impacts to water quality from increased erosion, sedimentation, and pollutants would be cumulatively significant and unmitigated.

**SUMMARY OF ALTERNATIVES:**

1. No Project Alternative: This alternative would avoid the impacts associated with the project. However, this alternative would not satisfy the project objectives to upgrade the PLWTP as an integral part of the Metro system and improve operational safety and efficiency of the plant.

2. System Modifications for Digesters 9 and 10: This alternative involves either of two possible scenarios related to treatment levels at the Point Loma plant which would either delay, reduce, or eliminate the need for additional digesters. Digesters 9 and 10 may not need to be constructed in the event waiver conditions of the Ocean Pollution Reduction Act are continued over the long-term (digester capacity needs would be provided off-site versus at the PLWTP). Alternatively, should the pending Marine Secondary Equivalency legislation (HR 1943) be approved, the need to construct Digesters 9 and 10 would be deferred until approximately the year's 2013 and 2050, respectively.

Should this alternative eliminate the need for Digesters 9 and 10, it would avoid the digesters' impacts to public views from the Pacific Ocean west of the PLWTP. The landscaped berm, to be developed with the Digesters 7 and 8 project, would also screen views of Digesters 9 and 10 from Cabrillo National Monument (CNM), and therefore visual impacts of Digesters 9 and 10 to CNM would remain unchanged under this alternative (assuming Council approval of Digesters 7 and 8). However, elimination of Digesters 9 and 10 would provide an opportunity to re-locate the proposed Southwest Parking Facility and, thereby avoiding the significant visual impacts associated with the Parking Facility on CNM (e.g., enable implementation of Parking Option B). Grading impacts are, likewise, assumed to have occurred under this assumption. Implementation of this alternative would avoid on-site impacts, such as air pollutant emissions, traffic, and noise resulting from the construction of digester tanks.

3. Alternative Locations for Digesters 9 and 10:

Under this alternative, Digesters 9 and 10 would be constructed at the north end of the PLWTP at one of two sites ("Northwest" and "Northeast"). The feasibility of this alternative depends upon; 1) whether or not the City is required to upgrade the PLWTP with secondary treatment facilities (ie; whether 5-year waivers are continually granted or Marine Secondary Equivalency legislation is approved); and, 2) the City receives approval from the Navy to use either of the alternative areas for the development of Digesters 9 and 10.

Locating Digesters 9 and 10 at the north end of the plant would reduce the impact on public views from CNM to less than significant, except cumulatively. Views from the west would still be significant and may, in fact, be greater than the proposed project. Biological impacts of the Northwest site alternative would remain unchanged, assuming the proposed Digesters 7 and 8 project and associated grading is approved and implemented. The Northeast site alternative would result in comparatively greater impacts due to grading and removal maritime succulent scrub. The remaining environmental impacts of siting Digesters 9 and 10 to the north would be similar to the proposed project.

Locating digesters in the alternative northern locations removes them from the other digesters and, thus, poses technical constraints to integrating the new digesters. The alternative would also require approval of the landowner, the U.S. Navy.

4. Other Alternatives Considered But Not Studied Further:

In addition to the alternatives described above, other alternatives and options were considered including alternative designs for the North Shoreline Protection Improvements Project (NSPI), the Water Tank and Pipeline, the North Operations Building, and the Parking Facility Improvements. The North Operations Building project may be further refined through the final stages of design. In addition, the projects evaluated at a program-level will be further evaluated as design progresses and regulatory constraints are reassessed.

5. Options for Parking Facility Improvements Project:

In addition to the alternatives studied, three project options have been proposed for the Parking Facility Improvements:

- A. North and Southwest Parking Facilities
- B. North and Southeast Parking Facilities
- C. Expanded North Parking Facility/No South Parking Facility

Option A is the option originally conceived by MWWD and the option associated with significant visual impacts to Cabrillo National Monument. Option B would reduce visual impacts to CNM and relies upon Digesters 9 and 10 not being built. Option C would have greatly reduced visual impacts to CNM and potentially limited biological impacts. Option C would also require Navy approval. Unlike the "Alternatives Considered, But Not Studied Further", these options are more fully evaluated in the EIR as part of the program-level analysis (See Project Description, Section 3 of the EIR). [See also revisions addressed in Addendum, DEP No. 96-0164].

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Development and Environmental Planning Division  
Development Services Department

October 3, 1995

Date of Draft Report

February 23, 1996

Date of Final Report

Analyst: Morty Prisament

**PUBLIC REVIEW:**

The following individuals, organizations, and agencies received a copy or notice of availability of the draft EIR and were invited to comment on its accuracy and sufficiency:

Federal Agencies

U.S. Navy Facilities Engineering, NCCOSC, RDT&E Division  
Navy, Real Estate and Environmental Divisions, SW Division  
Fort Rosecrans National Cemetery  
U.S. Army Corps of Engineers, San Diego Field Office  
National Park Service, Cabrillo National Monument  
U.S. Fish and Wildlife Service  
U.S. Environmental Protection Agency  
U.S. Dept. of Commerce, National Marine Fisheries Service  
U.S. Coast Guard  
Congressman, Brian Bilbray

State of California

State Clearinghouse  
CALTRANS, District 11  
Department Fish and Game  
Coastal Conservancy  
CAL EPA  
Department of Parks and Recreation  
State Water Resources Control Board  
Regional Water Quality Control Board  
California Coastal Commission  
State Lands Commission  
Air Resources Board

City of San Diego

Mayor's Office  
Councilmember Harvey, District 2  
Metropolitan Wastewater Department  
Water Utilities Department  
Planning Department  
Development Services Department  
Engineering and Capital Projects Department  
Fire Department  
Historical Site Board

County of San Diego

Air Pollution Control District  
Environmental Health Services, HMMD  
Department of Planning and Land Use  
County Supervisor, Greg Cox

Regional and Other

SANDAG  
SDG&E  
Metropolitan Transit Development Board  
County Water Authority  
San Diego Unified Port District  
All San Diego County Cities  
Metropolitan Wastewater Service Area Member Agencies  
City of Chula Vista  
City of Coronado  
City of Del Mar  
City of El Cajon  
City of Escondido  
City of Imperial Beach  
City of La Mesa  
City of Lemon Grove  
City of National City  
City of Poway  
City of Santee  
City of Solana Beach  
City of Encinitas

Community, Environmental, and Educational

Mission Beach Precise Planning Committee  
Ocean Beach Preservation League  
Ocean Beach Town Council  
Ocean Beach Planning Board  
Ocean Beach Merchants Association  
Pacific Beach Community Planning Board  
Peninsula Community Planning Board  
Peninsula Chamber of Commerce  
Point Loma Advisory Group Members  
Point Loma Association  
Sunset Cliffs Natural Park Recreation Council  
Midway Community Planning Advisory Committee  
San Diego Council of Divers  
San Diego Oceans Foundation  
Sierra Club  
Citizens Coordinate for Century 3 (C-III)  
Environmental Health Coalition  
San Diego Audubon Society  
California Native Plant Society  
San Diego Natural History Museum  
San Diego Historical Society  
Save Our Heritage Organization  
South Coastal Information Center  
San Diego County Archaeological Society  
San Diego Museum of Man  
Kumeyaay Cultural Historic Committee  
Cabrillo Historical Association  
Surfrider Foundation



Libraries and Media

San Diego Library, Point Loma Branch  
San Diego Library, Ocean Beach Branch  
San Diego Union-Tribune\*  
The Beacon\*  
Beach and Bay Press\*

\* Notice of Availability only.

Copies of the draft EIR, the Mitigation, Monitoring, and Reporting Program and any technical appendices may be reviewed in the office of the Development and Environmental Planning Division, or purchased for the cost of reproduction.

RESULTS OF PUBLIC REVIEW:

- ( ) No comments were received during the public input period.
- ( ) Comments were received but the comments do not address the accuracy or completeness of the environmental report. No response is necessary and the letters are attached at the end of the EIR.
- (X) Comments addressing the accuracy or completeness of the EIR were received during the public input period. The letters and responses follow.