

San Elijo Water Reclamation Facility Upgrades

Addendum to the
Final Mitigated Negative Declaration

January 2019 | KHA-37

Prepared for:

San Elijo Joint Powers Authority
2695 Manchester Avenue
Cardiff by the Sea, CA 92007

Prepared by:

HELIX Environmental Planning, Inc.
7578 El Cajon Boulevard
La Mesa, CA 91942

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INTRODUCTION

A Final Mitigated Negative Declaration (Final MND) was completed for the San Elijo Water Reclamation Facility (SEWRF) Upgrades Project in April 2016 and was approved by the San Elijo Joint Powers Authority (SEJPA) on April 11, 2016. Following approval, minor changes were made to the proposed project, including addition of a shared-use trail on the SEWRF property and safety improvements at the intersection of the SEWRF site and Manchester Avenue, as well as relocation of a planned solar field within the SEWRF site.

California Environmental Quality Act (CEQA) Guidelines Section 15164 requires either the Lead Agency or a responsible agency to prepare an addendum to an adopted negative declaration if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent environmental document have occurred. Section 15164(b) provides that an addendum “may be prepared if only minor technical changes or additions are necessary.”

This Addendum demonstrates that the revised project would not result in new or substantially more severe significant impacts relative to the proposed project as described in the Final MND.

CEQA Requirements

An addendum to the Final MND is permitted under CEQA Guidelines Sections 15162 and 15164 for projects where there are no substantial changes to the project, or in circumstances surrounding the project, and where the project would not have new significant impacts or substantially more severe impacts than those disclosed in the previously approved negative declaration. To summarize, Sections 15162 and 15164 of the CEQA Guidelines state that an addendum to a previously approved negative declaration can be prepared for a project if the criteria and conditions summarized below are satisfied:

- **No Substantial Changes.** There are no substantial changes proposed in the project that will require major revisions to the previous negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- **No Substantial Change in Circumstances.** No substantial changes to the circumstances regarding the project have taken place that would require major revisions of the previous negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.
- **No Substantial New Information.** There is no new information of substantial importance that was not known or could not have been known at the time of the previous negative declaration that shows the project would have one or more significant effects not discussed in the previous negative declaration or significant effects previously examined would be substantially more severe than shown in the previous negative declaration.

An addendum need not be circulated for public review but can be included in or attached to the adopted negative declaration. The decision making body shall consider the addendum with the adopted negative declaration prior to making a decision on the project.

None of the conditions identified in CEQA Guidelines Section 15162(a) would occur because:

- a) The changes to the project evaluated in the Final MND, as described in this Addendum, would not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Minor changes are proposed to the project, including addition of a shared-use trail on the SEWRF property and safety improvements at the intersection of the SEWRF site and Manchester Avenue. These changes in project description would not result in new or substantially more severe significant environmental impacts (refer to the comparison below for details regarding the impacts associated with the project changes).
- b) Circumstances and existing conditions surrounding the project site have not changed from those described in the Final MND approved in May 2016. Existing conditions on and surrounding the project site remain generally as described in the Final MND.
- c) There is no substantial new information. The changes in the proposed project do not constitute substantial new information as defined in the CEQA Guidelines. Changes to the proposed project would not result in new or substantially more severe significant impacts.
- d) Mitigation measures are required and are not different from those analyzed in the Final MND and contained in the adopted Mitigation Monitoring and Reporting Program.

BACKGROUND

Project Location

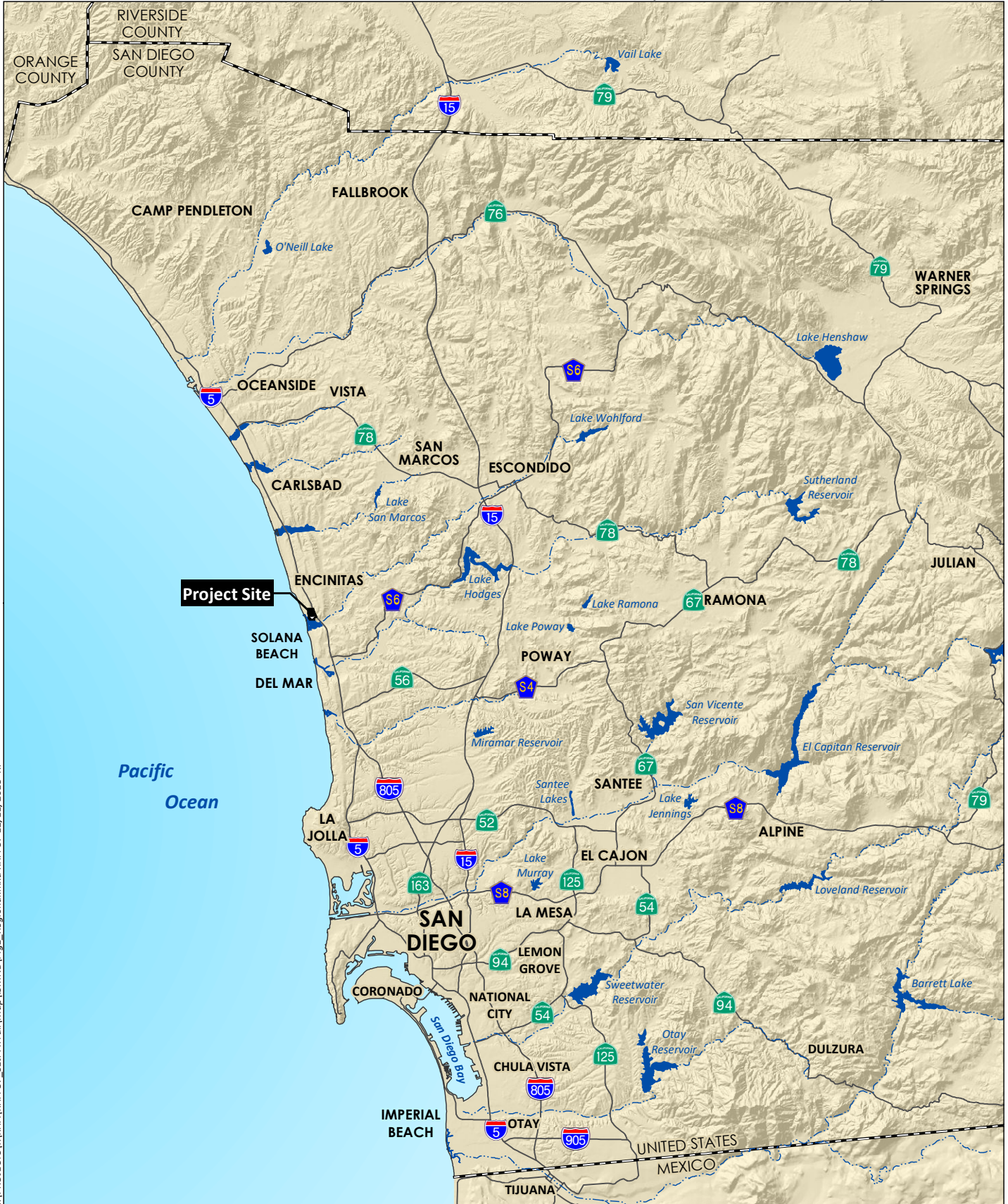
Facility upgrades from the proposed project would occur at the existing SEWRF site located at 2695 Manchester Avenue, Cardiff by the Sea, California 92007 (Assessor's Parcel Number 2610101302), as shown in Figure 1, *Regional Location*, and Figure 2, *Aerial Photograph*. The revised project upgrades would occur over the channel adjacent to the west of the SEWRF, at the intersection of Manchester Avenue and the driveway to the SEWRF, and in the southeastern portion of the SEWRF site in the vicinity of the existing flow equalization basins. The project site is surrounded by existing residential development to the north, west, and southeast. Interstate 5 (I-5) is located immediately to the east of the project site. San Elijo Lagoon is located to the south across Manchester Avenue. The project site is located approximately 0.4 mile east of the Pacific Ocean.

Currently, the project site is mostly developed with the existing SEWRF, associated landscaping, and stormwater drainage facilities, as shown in Figure 2. The northern portion of the site is mostly undeveloped, except for stormwater facilities. The project site is zoned as Public/Semi-Public. The project is within the Coastal Zone.

Project Description as Proposed in the Approved Final MND

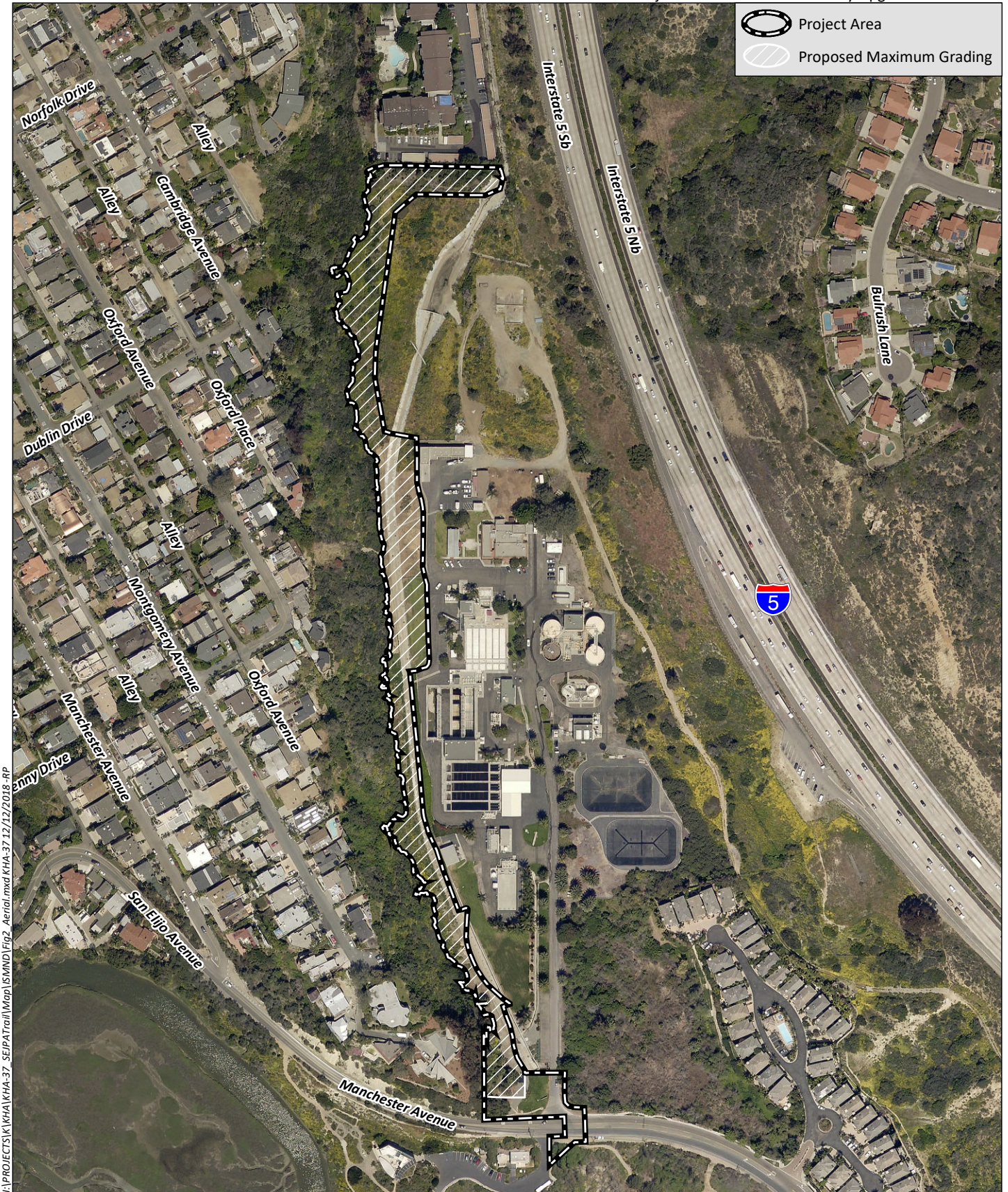
The previously approved project included various upgrades, rehabilitations, and replacements for components of the SEWRF (see Figure 3, *Approved Project Components*). These include:



Administration and Operations Buildings and Seismic Upgrades. The operations building, cogeneration building, and chlorine building would receive a seismic roof to wall connections retrofit. A new administration building would be constructed at the southern end of the project site, near the SEWRF entrance off Manchester Avenue.



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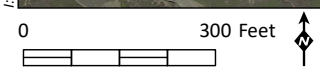
Source: Base Map Layers (SanGIS, 2016)



-  Project Area
-  Proposed Maximum Grading

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Source: Aerial (SanGIS, 2017)



Aerial Photograph



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Source: Dudek 2016

Site Improvements and Security. Site access and use would be improved by replacing the open storm channels with storm pipes or culverts. Work on the open storm channel would extend approximately 10 feet west of the existing channel. Site asphalt would be replaced. Fencing surrounding the SEWRF site would be improved for proper height along with the installation of climbing deterrents (also to be installed at the block wall located at the gate). Video surveillance would be improved at critical facility areas.

Preliminary Treatment Upgrades. Two existing mechanical screens would be replaced with new screens in new concrete channels, duty/standby compactors, and a new screenings conveyor/sluice would be installed. New screenings and grit inlet channels would be constructed. Corrosion in the existing screenings channels, grit chamber and channels, and primary influent channels would be repaired. Additional foul air ducting would be installed at the headworks channels and Grit and Screenings Building to improve odor control.

Electrical Upgrades. Switchboard MS-2 in the cogeneration building and the odor control panel in the headworks would be replaced. As part of the electrical upgrades, the Arc Flash Study would be updated and Arc Flash labels included on all electrical panels.

Dewatering Upgrades. These upgrades would include replacement of the existing belt filter presses, feed pumps, and electrical equipment and controls. The condition of the truck loading hopper would be evaluated, and the hopper would be repaired or retrofitted as necessary. The mezzanine and roof decking in the dewatering building would be repaired.

Digester Improvements. Digester improvements would include replacement of Sludge Circulation Pumps Nos. 2, 3, and 5, heat exchangers, and the floating cover on Digester No. 2. Repair would occur on Digester No. 2 (concrete and lining), Digester No. 3 (seals around cover), and Digester No. 4 (joint between cover and walls). Additionally, further inspection of cracks on Digesters Nos. 2, 3, and 4 may identify the need for further repair.

Aeration and Return Upgrades. These upgrades would include the installation of mixing in anoxic zones, high efficiency blowers, diffusers, permanent baffles, a fall arrest system, and Return Flow Pump No. 4. The drain pump, all discharge piping, and all pump rails would be replaced.

Dissolved Air Flotation (DAF) Upgrades and Co-thickening. Three pumps and the DAF No. 2 Drive would be replaced and a Pressurization Pump No. 2 (for DAF No. 2) would be installed. These upgrades would implement co-thickening of waste activated sludge and primary sludge.

Supervisory Control and Data Acquisition (SCADA) System. SCADA system hardware would be installed and the software would be updated.

Solar Fields. The proposed project includes four proposed solar fields. Conceptual plans for solar fields include an approximate 80-panel carport west of the generator, an approximate 300-panel ground-mounted field east of the generator, an approximate 200-panel carport west of the existing headworks, and an approximate 230-panel ground-mounted field north of the proposed 200-panel carport.

In the Final MND, project construction was identified to be phased intermittently over several years beginning in January 2017 and ending in September 2019. As of this document, construction has commenced on several projects; however, the work will likely be completed in 2023.

Water required for construction would be supplied by on-site recycled water. The following potential equipment were identified for construction: medium-sized excavation and earth moving equipment; dump trucks; cement mixers; portable welders; and cranes.

PROJECT DESCRIPTION

Changes to the Project Since Certification of the Final MND (Revised Project)

A 12-foot-wide shared-use trail would be constructed as part of the revised project on the SEWRF property (see Figure 4, *Revised Project Components*). The trail would mostly be constructed over the existing drainage channel, covering the existing open channel. The northern portion of the trail would travel through a vacant area on the SEWRF property.

Trail improvements would also provide connections/transitions at Manchester Avenue and to the bikeway improvements within I-5 at the northeast corner of the SEWRF property. The trail would require grading and construction of embankment slopes, security fencing, lighting installation (several lighting fixtures would be included along the trail at a height of approximately 14 feet), landscaping, surface drainage improvements and implementation of storm water quality best management practices (BMPs).








The project would include street-level enhanced trail crossing and traffic calming measures, and pedestrian-activated traffic control devices. The traffic calming measures would include a high-intensity crosswalk (HAWK) system, which is a pedestrian-activated beacon over the crosswalk to alert motorists when a pedestrian or bicyclist is crossing the road (see Figures 5a-5c, *HAWK Visual Simulation*), or other crosswalk alert system as approved by the City of Encinitas. Curb, gutter, and sidewalk improvements would be provided at the SEWRF entrance. Other roadway improvements at Manchester Avenue include a center turn lane, roadway signing and striping, and small retaining walls at the southeast corner of the SEWRF property.

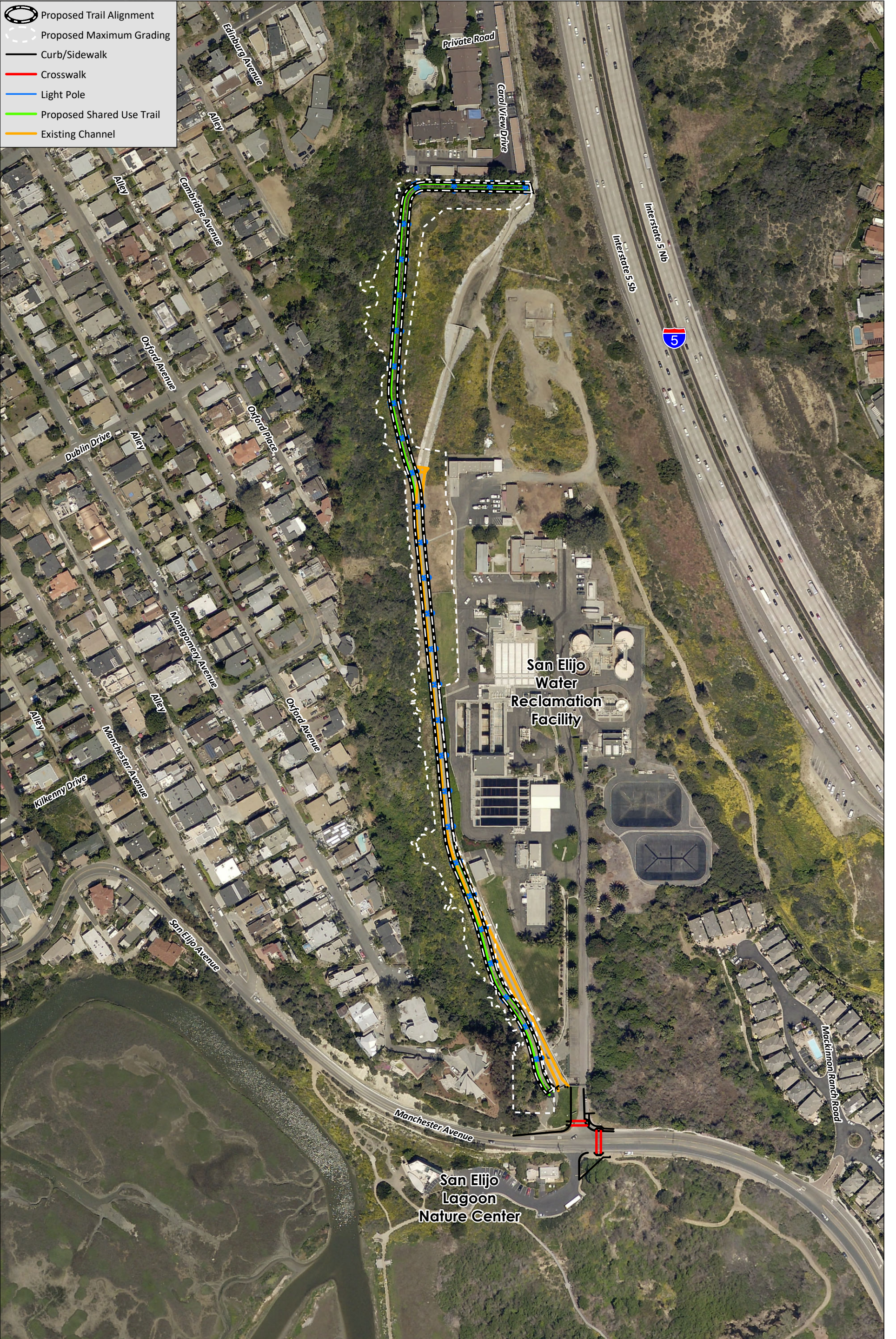
The revised project components total approximately 1.25 acres and would disturb a maximum of 0.75 acre per day. As shown in Table 1, *Anticipated Construction Schedule*, construction for the proposed project is estimated to start in August 2019 and be complete by August 2020.

Table 1
ANTICIPATED CONSTRUCTION SCHEDULE

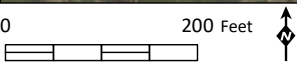
Construction Activity	Construction Period		
	Start	End	Number of Working Days
Clear/Grub & Rough Grade	8/1/2019	10/23/2019	60
Channel Construction & Drainage Improvements	9/2/2019	4/10/2020	160
Paving	4/13/2020	6/5/2020	40
Architectural Coating	6/8/2020	6/12/2020	5
Lighting, Fencing, & Landscaping	6/15/2020	8/7/2020	40

In addition, the project would include relocation of a planned ground-mounted solar array to the southeastern portion of the SEWRF site in the vicinity of the existing flow equalization basins. The solar array would be installed in an existing developed area within this portion of the SEWRF site.

-  Proposed Trail Alignment
-  Proposed Maximum Grading
-  Curb/Sidewalk
-  Crosswalk
-  Light Pole
-  Proposed Shared Use Trail
-  Existing Channel



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Source: Base Map Layers (SanGIS, 2016)



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Previously Disclosed Impacts

The Final MND determined that all impacts would be less than significant, except biological resources, cultural resources, and utilities and service systems. These potentially significant impacts would be reduced to a less than significant level with implementation of mitigation measures. The Final MND determined that potentially significant direct and indirect impacts to special-status species, sensitive natural communities, jurisdictional resources, and wildlife corridors would occur from project construction and operation; however, implementation of mitigation measures MM-BIO-1 through MM-BIO-4 for construction and MM-BIO-5 through MM-BIO-9 for operation would reduce impacts to a less than significant level. The Final MND determined that construction activities that may impact cultural resources would be potentially significant; however, implementation of mitigation measure MM-CUL-1 would reduce impacts to a less than significant level. The Final MND also determined that construction activities may impact paleontological resources, which would be potentially significant; implementation of mitigation measure MM-CUL-2 would reduce impacts to a less than significant level. In addition, the Final MND determined that significant environmental effects, as identified above, would occur from utilities and service systems through upgrades to the SEWRF facilities. This impact would be mitigated through the aforementioned mitigation measures. As such, no significant and unmitigable impacts would occur.

ENVIRONMENTAL ANALYSIS

The revised project modifications would not substantially change from the proposed project in a way that would modify the Final MND impact discussion for: agriculture and forestry resources, hazards and hazardous materials, land use and planning, mineral resources, population and housing, public services, and utilities and service systems. Therefore, the analysis below focuses on the CEQA topics that would be potentially affected by the modifications to the proposed project: aesthetics, air quality, biological resources, cultural resources, geology and soils, greenhouse gas (GHG) emissions, hydrology and water quality, noise, recreation, transportation and traffic, and tribal cultural resources.

Aesthetics

Scenic Vistas

The Final MND identifies a scenic stop off the southbound I-5, north of the Manchester Avenue exit, that overlooks the site. A viewer from this area would see the SEWRF site, in addition to the San Elijo Lagoon and Pacific Ocean. The revised project would construct a shared-use trail, mostly over an existing concrete drainage channel but with a smaller portion over undeveloped land in the northwestern portion of the SEWRF site. This new path would be consistent with the existing development of the SEWRF in the area, which dominates the visual landscape from the scenic stop-off of the small valley that the project is in. The revised project would also construct a HAWK system over the new crosswalk on Manchester Avenue (see Figures 5a-5c). Although this would add a traffic signal system in a location without such a system, the design of the HAWK system would be visually consistent with other traffic signals along Manchester Avenue/San Elijo Avenue, and given the limited height and bulk of the HAWK system compared to existing buildings and trees would not substantially affect the view from the scenic stop-off. The relocated solar array would not be highly visible because of proposed SEWRF structures, surrounding landscaping, and topography. In addition, similar to the proposed project, aesthetic impacts from construction of the revised project components would be temporary and short-term. Therefore,

impacts to scenic vistas would be less than significant, and the revised project is consistent with the findings for scenic vistas described in the Final MND.

Scenic Resources within a State Scenic Highway

As with the proposed project, the revised project components are located approximately 1,950 feet from Coast Highway 101, portions of which are designated as State Scenic Highway. However, no portions of Coast Highway 101 within San Diego County are designated State Scenic Highway. In addition, I-5, which is located adjacent to the SEWRF site to the east, is not listed as a State Scenic Highway. Therefore, no impacts to a State Scenic Highway would occur, and the revised project is consistent with the findings for scenic resources described in the Final MND.

Visual Character and Quality

The revised project would construct a shared-use trail, mostly over an existing concrete drainage channel but with a smaller portion over undeveloped land in the northwestern portion of the SEWRF site. This new path would be consistent with the existing development of the SEWRF in the area, which dominates the visual character and quality of the small valley in which the project is located. The revised project would also construct a HAWK system over the new crosswalk on Manchester Avenue (see Figures 5a-5c). Although this would add a traffic signal system in a location without such a system, the design of the HAWK system would be visually consistent with other traffic signals along Manchester Avenue/San Elijo Avenue, and given the limited height and bulk of the HAWK system compared to existing buildings and trees would not substantially affect the visual character and quality of the area. The relocated solar array would not be highly visible because of proposed SEWRF structures, surrounding landscaping, and topography and would not substantially affect the existing visual character and quality of the area. In addition, similar to the proposed project, aesthetic impacts from construction of the revised project components would be temporary and short-term. Therefore, impacts to visual character and quality would be less than significant, and the revised project is consistent with the findings for visual character and quality described in the Final MND.

Light and Glare

Lighting is currently provided throughout the existing SEWRF facilities. New lighting as a result of the proposed facility upgrades would be similar to existing SEWRF lighting. New lighting associated with the trail for security purposes during evening hours would be the minimum necessary to provide for safety. The HAWK system and street lights would be added over the crosswalk on Manchester Avenue, and would provide lighting to allow users to cross the street safely (see Figures 5a-5c). These additional lights on the street would not be a substantial addition to the area, as there are existing street lights in the area. No revised project components would be a substantial source of glare. Therefore, similar to the Final MND conclusions for light and glare, impacts would be less than significant.

Conclusion

In summary, the revised project would not alter the conclusions of the Final MND, and no new or substantially increased aesthetics impacts would occur.

Air Quality

To analyze the potential impacts from the revised project, an Addendum to the Air Quality and Greenhouse Gas Emissions Impact Assessment was prepared (HELIX 2018a; Appendix A).

Air Quality Plans

As described in the Final MND, consistency with local air quality plans is determined by if the project proposes development that is greater than anticipated in the City of Encinitas General Plan or in the San Diego Association of Governments' (SANDAG's) growth projections, and therefore would conflict with the State Implementation Plan and Regional Air Quality Standards (RAQS) and may contribute to a potentially significant cumulative impact on air quality. Similar to the proposed project, the revised project components would be consistent with existing zoning and General Plan land use designations for the project site, and would not result in growth projections beyond SANDAG's projections. In addition, as described below, criteria pollutant emissions of the revised project would be below County thresholds. Therefore, the revised project is consistent with the findings for air quality plans described in the Final MND.

Air Quality Standards

Emissions from the revised project were calculated for the Addendum to the Air Quality and Greenhouse Gas Emissions Impact Assessment using the California Emissions Estimator Model (CalEEMod) Version 2016.3.2.

Construction

The project would generate criteria pollutants during clearing/grubbing, rough grading, channel construction and drainage improvements, paving, and installation of lighting, fencing and landscaping. Construction emissions would be short-term and temporary and would cease with construction termination.

The proposed project construction emissions are shown in Table 2, *Maximum Daily Construction Emissions*. The proposed project's maximum daily emissions were added to the peak day reported in the MND, regardless of timing, to present the most conservative analysis. Table 2 presents the maximum anticipated daily emissions and compares them to County Screening Level Thresholds (SLTs; County 2007). As shown, new maximum daily emissions would remain below County SLTs and impacts would remain less than significant.

Operation

The revised project proposes a shared-use trail and roadway and drainage improvements and would only generate emissions during construction. Therefore, operational emissions would not be generated from the revised project, and no changes to the operational emissions impacts discussed in the Final MND would occur.

**Table 2
MAXIMUM DAILY CONSTRUCTION EMISSIONS**

Construction Phase	Pollutant Emissions (pounds/day)					
	VOC	NO _x	CO	SO _x	PM ₁₀	PM _{2.5}
2019	3.38	36.66	21.76	0.04	4.52	2.98
2020	1.78	14.50	13.15	0.02	0.83	0.71
Maximum Daily Emissions¹	3.38	36.66	21.76	0.04	4.52	2.98
Maximum Daily Emissions Reported in the MND ²	15.03	26.82	21.77	0.04	5.55	3.21
New Maximum Daily Emissions	18.41	63.48	43.53	0.08	10.07	6.19
<i>SLT Threshold³ (lbs/day)</i>	<i>75</i>	<i>250</i>	<i>550</i>	<i>250</i>	<i>100</i>	<i>55</i>
Significant Impact?	No	No	No	No	No	No

¹ Proposed Project Emissions (CalEEMod; Attachment A)

² Previously Reported MND Emissions (SEJPA 2016; Page 27, Table 3.3-1)

³ The County Screening Level Thresholds (SLTs; County 2007) are used for the project, as the City of Encinitas does not have specific emissions thresholds.

Cumulatively Considerable Net Increase of Criteria Pollutants

As construction emissions of the revised project components, in combination with the proposed project components, would not exceed SLT thresholds, as determined in the Final MND the project would not create a cumulatively considerable increase of criteria pollutants.

In addition, as the revised project components do not generate operational emissions, no changes to the less than significant cumulative impacts from operation identified in the Final MND would occur.

Sensitive Receptors

Construction of the revised project components would generate similar toxic air contaminants (TACs) to the proposed project from construction equipment. Similar to the proposed project, the revised project components would not occur at a magnitude to generate substantial amounts of TACs and the TAC emissions would be temporary. Therefore, as identified in the Final MND, impacts would be less than significant.

The revised project proposes a shared-use trail and roadway and drainage improvements and would only generate TAC emissions during construction. Therefore, operational emissions of TACs would not be generated from the revised project, and no changes to the impacts from operational emissions of TACs discussed in the Final MND would occur.

Odors

Construction of the revised project components would generate similar odors to the proposed project from construction equipment. As such, odors would not occur at a magnitude to affect substantial amounts of people and as the odor emission would be temporary, as identified in the Final MND impacts would be less than significant.

The revised project proposes a shared-use trail and roadway and drainage improvements and would only generate emissions during construction. Therefore, operational emissions would not be generated

from the revised project, and no changes to the operational emissions impacts discussed in the Final MND would occur.

Conclusion

In summary, the revised project would not alter the conclusions of the Final MND, and no new or substantially increased air quality impacts would occur.

Biological Resources

To analyze the potential impacts from the revised project, an Addendum to the Biological Resources Technical Report was prepared (HELIX 2018b; Appendix B). The Addendum assessed the potential impacts on biological resources associated with the construction and operation of the revised project. The findings of this assessment support the determination that no new or substantially more severe significant adverse impacts would occur as a result of the revised project that were not already identified, analyzed, and assigned mitigation in the Final MND. This letter summarizes the findings for biological resources. A summary of revised project effects is provided below.

Sensitive Species

Rare Plants

None of the special-status plant species analyzed in the Final MND have the potential to occur within the revised project impact areas. Project impacts would be restricted to developed land, disturbed habitat (i.e., ruderal and weedy areas), and areas planted as part of the SEWRF and Manchester Avenue landscaping. The four Torrey pines identified on the project site would be avoided by the revised project. Similar to the previously approved project, potential significant indirect impacts could occur from the revised project to native habitat areas located off site and downstream of the project. The potential significant indirect impacts would be mitigated to less than significant levels with the implementation of the following mitigation measures from the Final MND: MM-BIO-1, MM-BIO-2, MM-BIO-3, and MM-BIO-5.

The revised project is consistent with the findings for rare plants described in the Final MND.

Sensitive Wildlife Species

As with plant species, none of the special-status animal species analyzed in the Final MND have the potential to occur within the revised project impact areas. Project impacts would be restricted to developed land, disturbed habitat (i.e., ruderal and weedy areas), and areas planted as part of the SEWRF and Manchester Avenue landscaping that lack suitable habitat for special-status animals. As such, no direct impacts would occur to special-status animal species.

The coastal California gnatcatcher, a federally listed threatened species and state species of special concern, has the potential to use off-site Diegan coastal sage scrub located on portions of the steep slopes to the west of revised project impact area. The critical habitat for the coastal California gnatcatcher that overlays the eastern portions of the SEWRF does not support Diegan coastal sage scrub or the critical habitat primary constituent elements. No revised project components are proposed in the critical habitat area. No impacts to Diegan coastal sage scrub or primary constituent elements within the critical habitat overlay would occur. The least Bell's vireo, a federally and state-listed endangered

species, has potential to occur within off-site riparian habitat located to the southeast of the SEWRF. Potential significant indirect impacts could occur to the gnatcatcher and/or vireo and their habitat that occurs off site within 500 feet of construction. In addition, if operational lighting is not properly shielded and directed away from adjacent habitat areas that could support either species, the lighting could adversely affect breeding behaviors and other life history requirements of either species. These potentially significant indirect impacts to the coastal California gnatcatcher and least Bell's vireo and from operational lighting were also identified in the Final MND. These potentially significant indirect impacts would be mitigated to less than significant levels with the implementation of the following mitigation measures from the Final MND: MM-BIO-1, MM-BIO-2, MM-BIO-3, MM-BIO-4, MM-BIO-5, MM-BIO-6, MM-BIO-7, MM-BIO-8, and MM-BIO-9.

The revised project is consistent with the findings for sensitive wildlife species described in the Final MND.

Sensitive Vegetation Communities

No riparian habitat or other sensitive natural community occurs within the revised project footprint. Therefore, no direct impacts to sensitive vegetation communities would occur. As identified in the Final MND, potentially significant indirect impacts could occur to off-site Diegan coastal sage scrub and other off-site sensitive habitat located downstream in association with San Elijo Lagoon. These potentially significant indirect impacts would be mitigated to less than significant levels with the implementation of the following mitigation measures from the Final MND: MM-BIO-1, MM-BIO-2, MM-BIO-3, and MM-BIO-5.

The revised project is consistent with the findings for sensitive vegetation communities described in the Final MND.

Wetlands

No wetlands occur within the revised project footprint; none are present within the SEWRF property. Therefore, no direct impacts to wetlands would occur. Wetlands do occur off site and downstream of areas that would require improvements, including the extension of culvert over the concrete flood control channel in the western portion of the SEWRF to accommodate the new trail. As identified in the Final MND, potential significant indirect impacts could occur to off-site sensitive habitat located downstream, including wetlands, associated with the San Elijo Lagoon. These potentially significant indirect impacts would be mitigated to less than significant levels with the implementation of the following mitigation measures from the Final MND: MM-BIO-1, MM-BIO-2, MM-BIO-3, and MM-BIO-5. As a regulatory requirement, SEJPA must notify the U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and California Department of Fish and Wildlife (CDFW), and obtain necessary permits from these agencies prior to construction activities at the concrete flood control channel; SEJPA would be required to implement all conditions and measures from these permits.

The revised project is consistent with the findings for wetlands described in the Final MND.

Wildlife Movement and Migratory Species

The SEWRF is currently fenced and does not serve as a wildlife corridor or habitat linkage. The SEWRF is surrounded to the north, east, and west by residential development and the I-5.

The location of the proposed bike trail would not substantially interfere with the movement of resident or migratory fish or wildlife species. The bike trail is proposed in an area that is generally located to the north and west of the SEWRF, on land comprised of disturbed habitat and a concrete-lined channel. Perimeter fencing currently exists around the SEWRF, preventing wildlife from entering or leaving native habitat adjacent to the project area via the SEWRF. Therefore, the SEWRF, in its current condition, does not allow migratory species to pass through the area.

The intersection improvements would occur in a developed area, in the intersection of the SEWRF driveway and Manchester Avenue. This developed location is not currently considered a wildlife corridor or nursery site for resident or migratory fish or other wildlife species, nor is suitable habitat present for resident fish species. The proposed upgrades will not change the intersection in a manner that would prevent the movement of fish or wildlife species through this area, as it is not currently a wildlife corridor.

As with the Final MND, the potential impacts on wildlife movement as a result of the planned shared-use trail and intersection improvements would be less than significant. The findings described in the Final MND for wildlife movement and migratory species are consistent with the revised project.

Local Policies and Ordinances

The revised project would not conflict with local policies or ordinances protecting biological resources, such as tree preservation ordinances. The findings for local policies and ordinances described in the Final MND are consistent with the revised project.

Adopted Habitat Conservation Plans

The revised project would have no conflict with the provisions of adopted habitat conservation plans; no adopted plans apply to the revised project or SEJPA. The findings described in the Final MND for adopted habitat conservation plans are consistent with the revised project.

Conclusion

In summary, the revised project would not alter the conclusions of the Final MND. No new significant biological impacts would occur, nor would the severity of previously identified significant impacts be increased.

Cultural and Tribal Cultural Resources

To analyze the potential cultural and tribal cultural impacts from the revised project, a Cultural Resources Technical Letter Report was prepared for the revised project Area of Potential Effect (APE) (HELIX 2019; Appendix C).

Historic Resources

As identified in the Final MND, four historic built-environment resources, the Control Building (current Office Building), Chlorination Building (Generator Building), Primary Digester (Digester 1), and Secondary Digester (Digester 2) were evaluated under CEQA and Section 106 of National Historic Preservation Act (NHPA) regulations, and found not eligible under state and national eligibility criteria. As such, the four historic built-environment resources are not considered historical resources. No additional built-

environment or historic resources were identified within the revised project APE, and no impacts would occur. Therefore, the revised project is consistent with the findings for historic resources described in the Final MND.

Cultural and Tribal Cultural Resources

No archaeological resources have been identified within the project area as analyzed in the Final MND, or by a records search update conducted for the revised project at the South Coastal Information Center (SCIC) by HELIX staff on November 1, 2018. In addition, the Native American Heritage Commission (NAHC) was contacted on October 30, 2018 for a Sacred Lands File (SLF) search. The NAHC indicated in a response dated November 26, 2018 that no known sacred lands or Native American cultural resources are within the revised project area. Native American outreach letters were sent on December 17, 2018 to Native American representatives and interested parties identified by the NAHC. No responses have been received to date.

An intensive pedestrian survey was conducted of the revised project APE on December 4, 2018, by HELIX Senior Archaeologist Stacie Wilson and Kumeyaay Native American Monitor Nate Curo (Red Tail Environmental). The majority of the revised project APE is developed or within previously disturbed areas. However, as observed on the 1980 aerial photograph, one area in the northwest portion of the revised project APE was observed as not having undergone extensive grading during the construction activities undertaken for the existing concrete channel. During the pedestrian survey, a shell scatter was observed in this area. As such, a testing effort by HELIX archaeologists was conducted on December 11, 2018, with Kumeyaay Native American Monitor participation. Although the testing resulted in the identification of a subsurface shell deposit, no midden soils or cultural artifacts were encountered, and it is unclear if the shell represents ecofacts (a find at an archaeological site that comes from something living) or if the deposit predates human occupation. The deposit is not considered a significant archaeological resource under CEQA or a historic property under Section 106 of the NHPA. However, as with the proposed project, based on the general topographic suitability for this area to support archaeological resources, and considering the moderate density of prehistoric and historic-era resources in the surrounding vicinity, it is possible that unidentified archaeological resources may still be present in the revised project APE. These impacts would not be increased by the revised project. Therefore, impacts to cultural and tribal cultural resources would remain potentially significant, and MM-CUL-1 described for the proposed project would be implemented to reduce impacts to less than significant. No additional measures to avoid or minimize significant impacts to cultural and tribal cultural resources are warranted.

Therefore, the revised project is consistent with the findings for cultural and tribal resources described in the Final MND.

Paleontological Resources

Similar to the proposed project, the revised project components would occur in mostly developed or disturbed areas. As with the proposed project, there is potential to encounter unknown paleontological resources during ground disturbing activities for the revised project components. Therefore, as determined in the Final MND for the proposed project, impacts for the revised project would be potentially significant. This impact would be mitigated to less than significant through MM-CUL-2 as described in the Final MND. Therefore, the revised project is consistent with the findings for paleontological resources described in the Final MND.

Human Remains

As with cultural resources, the revised project would not result in new significant impacts to human remains due to the work area still occurring in the same general area, and as no human remains were identified in the area tested for the revised project. Similar to the proposed project, if human remains are encountered, the project would comply with California Health and Safety Code Section 7050.5. Therefore, impacts would remain less than significant, and the revised project is consistent with the findings for human remains described in the Final MND.

Conclusion

In summary, the revised project would not alter the conclusions of the Final MND, and no new or substantially increased significant cultural and tribal cultural resources impacts would occur.

Geology and Soils

Rupture of Known Earthquake Fault

Similar to the proposed project, the revised project is not located within an Alquist-Priolo earthquake fault zone. The purpose of the Alquist-Priolo earthquake fault zones is to prohibit the location of structures on the traces of active faults, thereby mitigating potential damage due to fault surface rupture. Although the project site is not associated with an Alquist-Priolo earthquake fault zone, the revised project components would be built in compliance with the California Building Code according to recommendations from the revised project's geotechnical report. Therefore, impacts would be less than significant, and the revised project is consistent with the findings for rupture of a known earthquake fault described in the Final MND.

Strong Seismic Ground Shaking

Similar to the proposed project, the revised project is located within seismically active Southern California and thus may be subject to strong ground motion from seismic activity, due to the seismic activity of the region and proximity to the Newport-Inglewood-Rose Canyon Fault Zone. However, the revised project components would be built in compliance with the California Building Code according to recommendations from the revised project's geotechnical report. Therefore, impacts would be less than significant and the revised project is consistent with the findings for strong seismic ground shaking described in the Final MND.

Liquefaction

According to Figure 4.5-2 of the Environmental Assessment for the 2013-2021 Housing Element Update for the City of Encinitas, the project site is not located within a liquefaction zone, and is in the lower peak ground acceleration tier that is considered a low liquefaction risk (City 2018). In addition, the revised project components would be built in compliance with the California Building Code according to recommendations from the revised project's geotechnical report to minimize liquefaction risk. Therefore, impacts would be less than significant and the revised project is consistent with the findings for liquefaction described in the Final MND.

Landslides

According to the California Department of Conservation Seismic Hazard Zones Maps for the Encinitas Quadrangle (Department of Conservation 1986), the majority of the project site is located in Landslide Susceptibility Area 1 (least susceptible), with the westernmost portion of the project and the hillside to the west being in Landslide Susceptibility Area 3 (generally susceptible). There is no known occurrence of seismically induced landslides within or surrounding the project area (Department of Conservation 1986). In addition, the revised project components would be built in compliance with the California Building Code according to recommendations from the revised project's geotechnical report to reduce potential landslide hazards. Therefore, impacts would be less than significant and the revised project is consistent with the findings for landslides described in the Final MND.

Soil Erosion

During construction of the revised project components, soil erosion and loss of topsoil could occur through the transport of these materials through runoff, wind transport, and vehicle movement. As discussed in the Final MND for the proposed project, completion of a Storm Water Pollution Prevention Plan (SWPPP) in accordance with the Statewide Construction General Permit would be required for revised project construction. This requires implementation of water quality BMPs to ensure that water quality standards are met, and that stormwater runoff from the construction work areas does not cause degradation of water quality in receiving water bodies. Some of these BMPs include use of silt screening or fiber filtration rolls, appropriate handling and disposal of contaminants, fertilizer and pesticide application restrictions, litter control and pick up, and vehicle and equipment repair and maintenance in designated areas. With implementation of SWPPP requirements, impacts from soil erosion would be less than significant, and the revised project is consistent with the findings for soil erosion described in the Final MND.

Unstable Geologic Units and Soil

As stated above, there is no known occurrence of seismically induced landslides or unstable geologic units and soil within or surrounding the project area, and the project is not in a liquefaction zone. In addition, similar to the proposed project, the revised project would be built in compliance with the California Building Code according to recommendations from the revised project's geotechnical report to minimize impacts from unstable geologic units and soil. Therefore, impacts from unstable geologic units and soil would be less than significant, and the revised project is consistent with the findings for soil erosion described in the Final MND.

Expansive Soil

As stated in the Final MND, the SEWRF area has no known occurrences or identification of expansive soils within the site. In addition, the revised project would be built in compliance with the California Building Code according to recommendations from the revised project's geotechnical report to minimize impacts from expansive soil. Therefore, impacts from expansive would be less than significant, and the revised project is consistent with the findings for expansive soil described in the Final MND.

Wastewater Disposal Systems

Similar to the proposed project, the revised project does not include disposal of wastewater in soils. Therefore, no impacts would occur, and the revised project is consistent with the findings for wastewater disposal systems described in the Final MND.

Greenhouse Gas Emissions

Greenhouse Gas Emissions

Construction

Similar to the project analyzed in the Final MND, the revised project would generate GHG emissions during construction. CalEEMod estimates construction emissions for each year of construction activity based on the annual construction equipment profile and other factors as needed to complete all phases of construction by the target completion year. As such, each year of construction activity has varying quantities of GHG emissions. Construction GHG emissions are generated by vehicle exhaust from off-road construction equipment, on-road hauling trucks, and worker commuting trips.

Input details and output for GHG emissions are provided in Attachment A of Appendix A. The estimated construction GHG emissions for the project are shown in Table 3, *Total Construction Greenhouse Gas Emissions*. As recommended by the County, construction emissions may be amortized over the operational lifetime of the project, which can conservatively be estimated at 20 years. Therefore, as shown in Table 3, total construction GHG emissions would generate 481.27 metric tons (MT) CO₂e, resulting in approximately 24.06 MT CO₂e per year.

Table 3
TOTAL CONSTRUCTION GREENHOUSE GAS EMISSIONS

Construction Year	Total CO₂e (Metric Tons)
2019	145.73
2020	122.29
<i>Proposed Project Total Emissions</i>¹	268.02
Total Emissions Reported in the MND ²	213.25
<i>Revised Total Construction Emissions</i>³	481.27
<i>Amortized Construction Emissions</i>⁴	24.06

¹ Proposed Project Emissions (CalEEMod; Attachment A)

² Previously Reported MND Emissions (SEJPA 2016; Page 57, Table 3.7-1)

³ Totals may not sum due to rounding

⁴ Amortized over 20 years per County guidance (County 2015)

Operation

Table 4, *Total Operational Greenhouse Gas Emissions*, includes the total annual emissions for the revised project. The emissions include the amortized annual construction emissions anticipated for the project, as revised. The project revisions would not alter operational emissions. As shown in Table 4, the revised project would result in annual GHG emissions of 122.11 MT CO₂e. Therefore, the total operational emissions would not exceed the 900 MT CO₂e per year screening threshold used in the MND and

impacts would remain less than significant. The revised project is consistent with the findings for GHG emissions described in the Final MND.

**Table 4
TOTAL OPERATIONAL GREENHOUSE GAS EMISSIONS**

Emissions	Total CO ₂ e (Metric Tons)
Total Operational Emissions Reported in the MND ¹	98.05
New Amortized Construction Emissions	24.06
Total Operational Greenhouse Gas Emissions	122.11
<i>Screening Threshold²</i>	<i>900 MT CO₂e per year</i>
Significant Impact?	No

¹ Previously Reported MND Emissions (SEJPA 2016; Page 58, Table 3.7-2)

² County 2015

Greenhouse Gas Plans

The proposed project in the Final MND was determined to be consistent with the following applicable GHG plans and policies: City of Encinitas Climate Action Plan; California Air Resources Board (CARB) Scoping Plan; Executive Order B-30-15, and SANDAG’s Regional Transportation Plan/Sustainable Communities Strategy. As the proposed project would not increase GHG emissions above thresholds (e.g., the 900 MT CO₂e threshold), and as the project would be consistent with zoning and land use designations, the proposed project was considered consistent with these plans. The revised project would also not increase emissions above thresholds, as shown in Table 4, and also would be consistent with the zoning and land use designations of the project site. Therefore, impacts to the aforementioned GHG plans would be less than significant and would be consistent with the findings for GHG plans described in the Final MND.

Conclusion

In summary, the revised project would not alter the conclusions of the Final MND, and no new or substantially increased GHG impacts would occur.

Hydrology and Water Quality

Water Quality Standards

Similar to the project analyzed in the Final MND, the revised project would involve ground-disturbing activities for grading and excavation that could result in sediment discharge in stormwater runoff. In addition, construction would involve the use of oil, lubricants, and other chemicals that could be discharged from leaks or accidental spills. As with the proposed project, the revised project would implement a SWPPP during construction that would implement water quality BMPs (e.g., silt screens, fiber rolls, litter control, etc.) to ensure water quality standards are met. Operation of the shared-use trail would not introduce new contaminants to water quality. Therefore, impacts would be less than significant, and the findings for water quality described in the Final MND are consistent with the revised project.

Groundwater Supplies

A small portion of the shared-use trail would convert a pervious land cover to an impervious land cover. Similar to the proposed project analyzed in the Final MND, the additional areas of impervious land cover would result in less stormwater infiltration in these specific locations; however, the reduction in groundwater recharge due to the increase in impervious surfaces would not be substantial. As such, the revised project would not significantly change groundwater quantities or result in substantial losses to groundwater recharge capability, and impacts would be less than significant. The findings for groundwater supplies described in the Final MND are consistent with the revised project.

Erosion

Construction of the revised project would alter the existing drainage pattern of the site through construction of new impervious surfaces, where the trail is built over undeveloped areas, and also through the portions of the trail that would cover the existing channel. During construction, a SWPPP would implement stormwater BMPs to ensure that substantial erosion or siltation would not occur on- or off-site. During operation, water would be collected on the trail surface via ditches and inlets and conveyed directly to the box culvert at discrete discharge points to ensure substantial erosion or siltation would not occur on- or off-site. Therefore, through implementation of a SWPPP and project design, impacts would be less than significant. The findings for erosion from drainage alteration described in the Final MND are consistent with the revised project.

Runoff

Construction of the revised project would alter the existing drainage pattern of the site through construction of new impervious surfaces, where the trail is built over undeveloped areas, and also through the portions of the trail that would cover the existing channel. During construction, a SWPPP would implement stormwater BMPs to ensure a substantial increase in runoff would not occur on- or off-site. During operation, water would be collected on the trail surface via ditches and inlets and conveyed directly to the box culvert at discrete discharge points. As with the proposed project, the revised project would be required to implement pertinent regulations and conditions such as the Water Quality Control Plan (WQCP) for the San Diego Basin and the Municipal Storm Water Permit (Regional MS4 Permit) to ensure a substantial increase in runoff would not occur on- or off-site. Therefore, through implementation of a SWPPP, compliance with the WQCP for the San Diego Basin and the Regional MS4 Permit, and project design, impacts would be less than significant. The findings for runoff from drainage alteration described in the Final MND are consistent with the revised project.

100-year Flood Hazard Areas

As with the proposed project, the revised project would not include structures or housing within a 100-year flood hazard area. No impacts would occur, and the findings for flood areas described in the Final MND are consistent with the revised project.

Levee or Dam Failure

As with the proposed project, the revised project would not be located in an area that would have the potential to be flooded as a result of levee or dam failure. No impacts would occur, and the findings for levee and dam failure as described in the Final MND are consistent with the revised project.

Seiche, Tsunami, or Mudflow Hazards

As with the proposed project, the revised project would not be located in an area susceptible to seiche or tsunami hazards. The revised project would modify portions of the western hillside to accommodate the shared-use trail; this work would be performed per the geotechnical report recommendations and applicable standards and would not increase the risk for mudflow. No impacts would occur, and the findings for seiche, tsunami, and mudflow hazards as described in the Final MND are consistent with the revised project.

Conclusion

In summary, the revised project would not alter the conclusions of the Final MND. No new significant hydrology and water quality impacts would occur, nor would the severity of previously identified significant impacts be increased.

Noise

Permanent Increase in Noise

Minor noise may be generated from users of the trail; however, the revised project components do not include components that would generate substantial noise. Therefore, permanent noise impacts would remain less than significant, and the findings for noise described in the Final MND are consistent with the revised project.

Temporary Increase in Noise

Similar to the proposed project analyzed in the Final MND, temporary noise would be created during project construction from heavy construction machinery such as large bulldozer. Construction of the channel would use an excavator, backhoe, crane, skid steer loader, and pump within 175 feet of the closest residences to the west. With a conservative assumption that this equipment would all be operating at the closest distance at the same time, according to the Roadway Construction Noise Model (RCNM) noise levels at the nearest residences would be 71.7 A-weighted decibels (dBA) one-hour equivalent (L_{EQ}), which would be below the 75-dBA threshold for the City of Encinitas. In addition, the project would implement the construction BMPs listed on pages 72 and 73 of the Final MND. Therefore, construction noise impacts would remain less than significant, and the findings for construction noise described in the Final MND are consistent with the revised project.

Vibration

Similar to the proposed project analyzed in the Final MND, vibration would be created during project construction from heavy construction machinery such as large bulldozer. The MND analyzed a bulldozer at a distance of 200 feet, resulting in a vibration level of 0.004 Peak Particle Velocity (PPV) inch per second (IPS), well below the Federal Transit Administration threshold of 0.20 PPV IPS. Project construction would occur slightly closer to nearby residences to the west, at a distance of 175 feet. At this distance, vibration levels from a bulldozer would be approximately 0.005 PPV IPS, also well below the Federal Transit Administration threshold of 0.20 PPV IPS. Therefore, vibration impacts would remain less than significant, and the findings for vibration described in the Final MND are consistent with the revised project.

Airport Noise

The revised project components are located approximately 7.4 miles south of the nearest airport (McClellan-Palomar Airport), and are not located within the vicinity of a private airstrip. No impacts would occur, and the findings for airport noise described in the Final MND are consistent with the revised project.

Conclusion

In summary, the revised project would not alter the conclusions of the Final MND. No new significant noise impacts would occur, nor would the severity of previously identified significant impacts be increased.

Recreation

Increase Use of Existing Recreational Facilities

Development of the proposed shared-use trail and crosswalk improvements would improve access to existing recreational facilities (e.g., trails within the San Elijo Lagoon area). While the increased access and associated use of trails may increase the physical deterioration of the recreational facilities, these trails are already accessible to users in the area, and the increase from the proposed trail would not be substantial. Therefore, physical deterioration impacts from increased recreational use of revised project would be less than significant, and the findings described in the Final MND are consistent with the revised project.

Construct New Recreational Facilities

The proposed project entails the construction of a shared-use trail that would serve as a transportation facility with recreational value. Potential environmental effects resulting from the proposed trail are analyzed in this Addendum. As discussed in this Addendum, the revised project would not result in new significant impacts that were not analyzed in the Final MND. Implementation of the Final MND mitigation measures would reduce impacts to below a level of significance. Therefore, the findings described in the Final MND are consistent with the revised project.

Transportation and Traffic

Circulation System Effectiveness

Similar to the proposed project analyzed in the Final MND, the majority of traffic impacts would be limited to temporary construction impacts due to associated construction vehicles entering and exiting SEWRF from Manchester Avenue. According to the Addendum to the Air Quality and Greenhouse Gas Emissions Impact Assessment, construction traffic would peak with 23 daily trips during the lighting, fencing, and landscaping phase, which would be a negligible addition to traffic on Manchester Avenue. The majority of construction would occur within the SEWRF property, with the potential for short-term lane closures to install the crosswalk and HAWK system across Manchester Avenue. This work would be temporary, and would not be anticipated to have a substantial effect on the roadway's Level of Service (LOS).

Project operation may increase pedestrians or bicyclists crossing Manchester Avenue using the crosswalk and HAWK system, which may require additional stoppage for vehicles on the street. However, this would not impact LOS operation of the roadway.

Therefore, traffic circulation impacts would remain less than significant, and the findings for traffic circulation described in the Final MND are consistent with the revised project.

Congestion Management Plans

As described above under *Circulation System Effectiveness*, the revised project would not have a significant impact on the effectiveness of the circulation system. Therefore, similar to the analysis in the Final MND, the revised project would not have a significant impact on congestion management plans. The less than significant findings for congestion management programs described in the Final MND are consistent with the revised project.

Air Traffic Hazards

The revised project components are located approximately 7.4 miles south of the nearest airport (McClellan-Palomar Airport), and are not located within the vicinity of a private airstrip. No impacts would occur, and the findings for air traffic hazards described in the Final MND are consistent with the revised project.

Traffic Design Hazards

The revised project would add a crosswalk at the Manchester Avenue and SEWRF facility intersection to allow trail users to connect to San Elijo Lagoon south of Manchester Avenue. To allow for safe passage of trail users and other users of the crosswalk, a HAWK system would be installed. The HAWK system was chosen over other crosswalk devices because it would provide the optimal visibility to drivers that the crosswalk was being used. Therefore, through project design, a traffic design hazard would not be implemented by the revised project components, and impacts would be less than significant. The findings for traffic design hazards described in the Final MND are consistent with the revised project.

Inadequate Emergency Access

The majority of construction would occur within the SEWRF property, with the potential for short-term lane closures to install the crosswalk and HAWK system across Manchester Avenue and for minor curb and sidewalk work on the roadway. This work would be temporary, lasting approximately two weeks, and at least one through lane would be maintained during the construction. Traffic control for this construction would be approved the City. Therefore, impacts would not be significant, and the findings for emergency access described in the Final MND are consistent with the revised project.

Public Transit, Bicycle, or Pedestrian Facility Plans

Construction of the Manchester Avenue/SEWRF intersection improvements may temporarily interfere with existing bicycle and pedestrian facilities (e.g., sidewalks) on Manchester Avenue. This construction would be temporary, lasting approximately two weeks, and connectivity along at least one side of the road would be maintained during construction. Construction of the shared-use trail and crosswalk improvements on Manchester Avenue would improve bicycle and pedestrian circulation in the area.

Therefore, no impacts would occur, and the findings for public transit, bicycle, and pedestrian facility plans described in the Final MND are consistent with the revised project.

Conclusion

In summary, the revised project would not alter the conclusions of the Final MND. No new significant transportation and traffic impacts would occur, nor would the severity of previously identified significant impacts be increased.

DETERMINATION

As discussed above, the revised project would not result in new significant impacts or a substantial increase in the severity of previously identified significant impacts. There have been no substantial changes proposed to the project that would require major revisions to the Final MND due to new significant environmental effects or a substantial increase in the severity of previously identified significant effects. There have been no substantial changes with respect to the circumstances under which the project is undertaken which would require revisions to the Final MND. There is no new information of substantial importance which shows that the project would have significant environmental effects either not discussed or that would be substantially more severe than discussed in the Final MND. Additionally, there have been no mitigation measures or alternatives previously found not to be feasible that would in fact be feasible, nor are there measures or alternatives considerably different than those analyzed in the Final MND that would reduce identified significant impacts.

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