ATTACHMENT 1

HELIX Environmental Planning

San Elijo Water Reclamation Facility Upgrades

Second Addendum to the Final Mitigated Negative Declaration

August 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 (Dudek 2016) and was adopted by the San Elijo Joint Powers Authority (SEJPA) on April 11, 2016. Following approval, the project was modified to include the addition of a shared-use trail on the SEWRF property, safety improvements at the intersection of the SEWRF site and Manchester Avenue, and relocation of a planned solar field within the southeastern portion of the SEWRF site. These project modifications were addressed in an Addendum to the Final MND (First Addendum; HELIX 2019a), which was approved by the SEJPA on January 14, 2019. These modifications, as well as the other improvements originally proposed in the Final MND, are herein referred to as the Approved Project. The SEJPA is proposing modifications to the Approved Project including: (1) additional information regarding the proposed solar field in the southeastern portion of the SEWRF property, and (2) redesign of SEWRF entrance improvements along Manchester Boulevard. The Approved Project with these proposed modifications is herein referred to as the Revised Project.

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 Second Addendum demonstrates that the Revised Project would not result in new or substantially more severe significant impacts relative to the Approved Project as described in the Final MND and First Addendum.

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 in the Project**. 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 result in any of the following:

1. The project will have one or more significant effects not discussed in the previous negative declaration;

2. Significant effects previously examined will be substantially more severe than shown in the previous negative declaration;

3. Mitigation measures 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 proponent declines to adopt the mitigation measure; or

4. Mitigation measures which are considerably different from those analyzed in the previous negative declaration would substantially reduce one or more significant effects on the environment, but the project proponent declines to adopt the mitigation measure.

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 as a result of the Revised Project because:

a) The changes to the Approved Project evaluated in the Final MND and First Addendum, as described in this Second 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 Approved Project, including additional information on the proposed solar field in the southeastern portion of the SEWRF property and a redesign of road crossing enhancements at the SEWRF frontage with 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 proposed modifications).

b) No changes in circumstances regarding the Approved Project have occurred that substantially differ from those described in the Final MND (adopted in April 2016) and First Addendum (approved in January 2019) or would result in new or substantially more severe significant environmental impacts.

c) There is no substantial new information. The proposed modifications do not constitute substantial new information as defined in the CEQA Guidelines. The proposed modifications would not result in new or substantially more severe significant impacts.

d) Mitigation measures are required and are not new or considerably different from those identified and analyzed in the Final MND. Revisions to one previously identified mitigation measure are necessary for the Revised Project due to a change in existing conditions; however, the revised mitigation measure is not required because of a new or substantially more severe significant environmental impact. The revised measure also would not result in a new or substantial increase the severity of previously identified significant environmental impacts following its implementation.

BACKGROUND

Project Location

Facility upgrades would occur at the existing SEWRF site located at 2695 Manchester Avenue, Cardiff-by-the-Sea, California 92007 (Assessor's Parcel Number 261-010-1302), as shown in Figure 1, *Regional Location*, and Figure 2, *Aerial Photograph*. The revised project upgrades would occur 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. These include:

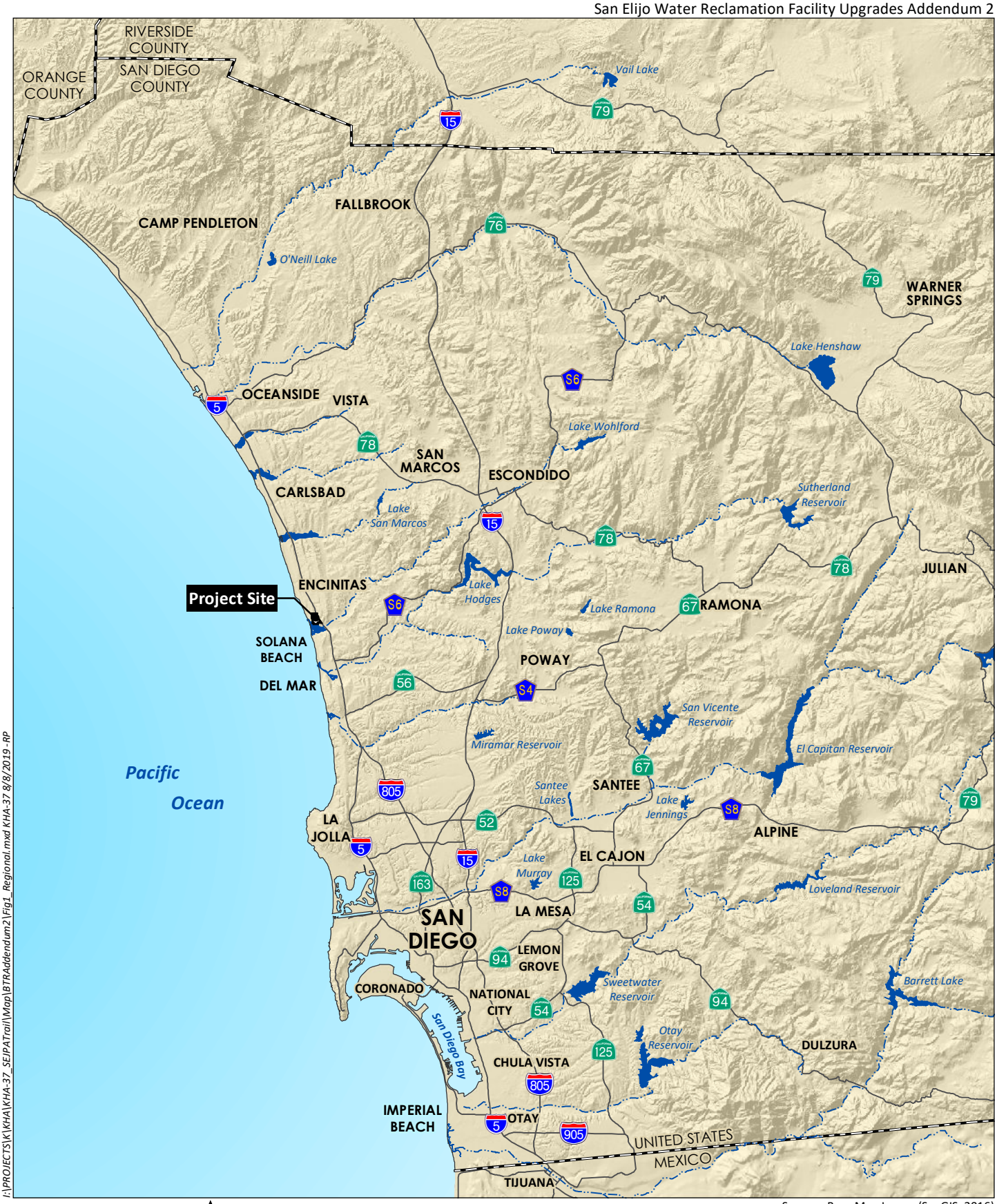
Administration and Operations Buildings and Seismic Upgrades. The operations building, cogeneration building, and chlorine building would receive a seismic roof-to-wall connections retrofit. A new administration building would be constructed at the southern end of the project site, near the SEWRF entrance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

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



I:\PROJECTS\K\KHA\KHA-37_SEJPATrail\Map\BTRAddendum2\Fig1_Regional.mxd KHA-37 8/8/2019 -RP

0 8 Miles

Source: Base Map Layers (SanGIS, 2016)

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Regional Location

Figure 1

I:\PROJECTS\K\KHA\KHA-37_SEJPATrail\Map\BTRAddendum2\Fig3_Aerial.mxd KHA-37 8/8/2019 -CL

0 200 Feet

Source: Aerial (SanGIS, 2017)

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Aerial Photograph

Figure 2

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.

Prior Changes to the Project (Approved Project)

The project was modified in 2018 to include the addition of a shared-use trail on the SEWRF property, safety improvements at the intersection of the SEWRF site and Manchester Avenue, and relocation of a planned solar field within the SEWRF site. These project modifications were addressed in the First Addendum to the Final MND (HELIX 2019a) and are briefly described below.

Shared-use Trail. The Approved Project included construction of a 12-foot-wide shared-use trail in the western portion of the SEWRF property. The trail would mostly be constructed over an 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).

SEWRF/Manchester Avenue Intersection Improvements. The Approved Project included street-level enhanced trail crossing and traffic calming measures, and pedestrian-activated traffic control devices. The traffic calming measures included 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, 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 identified roadway improvements at Manchester Avenue included a center turn lane, roadway signing and striping, and small retaining walls at the southeast corner of the SEWRF property.

Solar Field Relocation. As part of the Approved Project, the First Addendum identified the general relocation of a planned ground-mounted solar array to the southeastern portion of the SEWRF site. No specific information regarding location, equipment or system types, or overall footprint were provided or known at the time.

Construction of these project modifications was anticipated to start in August 2019 and be completed by August 2020.

PROJECT DESCRIPTION

Proposed Changes to the Approved Project (Revised Project)

The SEJPA is proposing modifications to the Approved Project including: (1) additional information regarding the proposed solar field in the southeastern portion of the SEWRF property, and (2) redesign of SEWRF entrance improvements along Manchester Boulevard. These Revised Project components are described below.

Solar Field. The First Addendum identified the solar field in the southeastern portion of the SEWRF site as a relocated facility. This solar field, however, is proposed as an additional facility rather than one that would be relocated from another planned location on the SEWRF property. The proposed additional solar field would be located in the southeastern corner of the SEWRF site (refer to Figure 2) and would consist of ground-mounted solar photovoltaic (PV) panels within areas cleared of vegetation and adjacent to existing water treatment infrastructure. The southern end of the proposed solar field is adjacent to a stand of acacia (*Acacia* sp.) trees (i.e., non-native vegetation) that would provide a visual screen of the SEWRF for the residential neighborhood to the south. The solar field would consist of an array of standard ground-mounted solar PV panels and associated mounting supports. These types of solar panels are low-profile and not highly reflective.

SEWRF/Manchester Avenue Intersection Improvements. The Revised Project proposes a fully-actuated traffic signal instead of the previously proposed pedestrian-activated crossing at the SEWRF entrance at Manchester Avenue. The Revised Project also proposes additional surface improvements within Manchester Avenue public right-of-way to facilitate pedestrian crossing of the SEWRF driveway and Manchester Avenue as well as to incorporate green street features.

The traffic signal would include the following components:

- Fully-actuated traffic signal with virtual detection (cameras) on each intersection leg;
- Signal masts with intersection safety lighting; and

- "Traffic Signal Ahead" signs with solar-powered beacons at both intersection approaches along Manchester Avenue.

Proposed surface improvements would include:

- Curb and gutter along the frontage of the SEWRF from the westerly property line to the west side of the SEWRF's entrance driveway;

- Americans with Disabilities Act (ADA)-compliant pedestrian ramps, high-visibility crosswalks, and pedestrian signals within the public right-of-way to cross the SEWRF driveway and to cross Manchester Avenue at the east side of the driveway;

- Curb, gutter, sidewalk and ADA-compliant directional pedestrian ramps at the east side of the SEWRF's driveway and at the east side of the entrance to the San Elijo Lagoon Ecological Reserve and Regional Park and Nature Center on the south side of Manchester Avenue;

- New asphalt concrete (AC) paving between the existing AC paving and the new curb and gutter and within the SEWRF's entrance;

- A biofiltration basin along the SEWRF frontage to detain and treat roadway runoff and urban runoff that enters the SEWRF site from the west; and

- Removal of an existing grated inlet near the northwest corner of the intersection, extension of an existing storm drain pipe, and construction of a new inlet structure to serve the biofiltration basin and to remove tributary storm water runoff from the roadway via curb cuts that is not diverted to the biofiltration basin.

As shown in Table 1, *Anticipated Construction Schedule*, construction for the Revised Project is estimated to start in December 2019 and be complete by December 2020.

Table 1
ANTICIPATED CONSTRUCTION SCHEDULE

Construction Activity	Construction Period		
	Start	End	Number of Working Days
Clear/Grub & Rough Grade	12/1/2019	2/2/2020	60
Channel Construction & Drainage Improvements	1/2/2020	8/12/2020	160
Paving	8/13/2020	10/7/2020	40
Architectural Coating	10/8/2020	10/14/2020	5
Lighting, Fencing, & Landscaping	10/15/2020	12/9/2020	40

Previously Disclosed Impacts

The Final MND and First Addendum 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 that were identified in the Final MND. 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. The First Addendum reached the same conclusions and documented that the project changes would not result in new or substantially more severe significant environmental effects that were previously identified in the Final MND.

ENVIRONMENTAL ANALYSIS

The Revised Project modifications would not substantially change from the Approved 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, recreation, and utilities and service systems. Therefore, the analysis below focuses on the CEQA topics that would be potentially affected by the proposed modifications to the Approved Project: aesthetics, air quality, biological resources, cultural resources, geology and soils, greenhouse gas (GHG) emissions, hydrology and water quality, noise, 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 install a traffic signal, curbs, gutters, sidewalks, and ADA ramps at Manchester Avenue. This would add a traffic signal system in a location without such a system, and would include new signal masts, signal heads, signage, and lighting at the intersection corners, as well as traffic signal warning signage approaching the intersection. The new traffic signal infrastructure would be visually consistent with other traffic signals along Manchester Avenue/San Elijo Avenue and given the limited height and bulk of the signal in relation to existing buildings and trees in the area would not substantially affect the view from the scenic stop. Similarly, the other intersection improvements would consist of typical roadway surface features that do not include vertical elements that could impede views from the scenic stop. The new solar array would not be highly visible because of proposed SEWRF structures, surrounding landscaping, and topography. The southern end of the area proposed for the additional solar field contains a stand of trees that provide a visual screen of the SEWRF facilities for the residential neighborhood to the south. These trees would be preserved in their current location to continue to provide visual screening of existing on-site facilities and the proposed solar field. The solar field would consist of ground-mounted solar PV panels, which are low-profile. They also would not be highly reflective because they would have anti-reflective or low-glare surfaces in accordance with mitigation measure MM-BIO-9 from the Final MND. Thus, the panels would not block

or adversely affect views from the scenic stop. In addition, similar to the Approved 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 impact conclusions for scenic vistas described in the Final MND.

Scenic Resources within a State Scenic Highway

As with the Approved 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 impact conclusions for scenic resources described in the Final MND.

Visual Character and Quality

The Revised Project would construct a traffic signal, curbs, gutters, sidewalks, and ADA ramps at Manchester Avenue. Although this would add a traffic signal system in a location without such a system, the design would be visually consistent with other traffic signals along Manchester Avenue/San Elijo Avenue. The addition of new traffic signal infrastructure in the immediate area would not substantially affect the visual character and quality of the area because they would not represent new visual elements, nor would they be at a bulk or scale that would substantially contrast with the existing visual environment. Similarly, the other intersection improvements would consist of typical roadway surface features commonly characteristic of suburban neighborhoods that already exist in the area. The proposed solar array would also be consistent with the existing visual character and quality of the area. The solar field would consist of ground-mounted solar PV panels, which are low-profile. They also would have anti-reflective or low-glare surfaces in accordance with mitigation measure MM-BIO-9 from the Final MND and, thus, would not be highly reflective. The panels would be located adjacent to a hillside separating the SEWRF property and the I-5. This hillside would provide some topographic screening of the panels from motorists driving along I-5. While they would be a new visual element within this area of the SEWRF site, they would be located adjacent to other existing industrial elements associated with the SEWRF and would be an extension of these existing facilities such that they would not be perceived as dominant new visual features. Additionally, the southern end of the area proposed for the additional solar field contains a stand of trees that provides a visual screen of the SEWRF for the residential neighborhood to the south. These trees would be preserved in their current location to continue to provide visual screening of existing on-site facilities and the proposed solar field. In addition, similar to the Approved 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 impact conclusions 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. Street lights associated with the new traffic signal would be provided at Manchester Avenue and lighting would be provided at the traffic signal warning signs along Manchester Avenue approaching the SEWRF entrance. These 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. The solar field would consist of ground-mounted solar PV panels and in accordance with mitigation measure MM-BIO-9 from the Final MND, they would have anti-reflective or low-glare surfaces and thus, would not cause adverse glare effects to nearby uses. 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, a Supplement to the Addendum to the Air Quality and Greenhouse Gas Emissions Impact Assessment was prepared (HELIX 2019b; 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 Approved 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 impact conclusion for air quality plans described in the Final MND.

Air Quality Standards

Construction

As with the Approved Project, the Revised Project would generate criteria pollutants during clearing/grubbing, rough grading, paving, and installation of lighting, traffic signals, fencing and landscaping. Construction emissions would be short-term and temporary and would cease with construction termination.

Construction emissions were previously calculated for the Approved Project in the Addendum to the Air Quality and Greenhouse Gas Emissions Impact Assessment (HELIX 2018) using the California Emissions Estimator Model (CalEEMod) Version 2016.3.2. Based on construction information provided by SEJPA, the Revised Project does not affect the assumed construction phasing duration, phasing sequencing, or equipment described in Table 1. The only change to the construction assumptions was the estimated start date. As stated in the Addendum to the Air Quality and Greenhouse Gas Emissions Impact Assessment (HELIX 2018):

> The quantity, duration, and the intensity of construction activity influence the amount of construction emissions and their related pollutant concentrations that occur at any one time. As such, the emission forecasts provided herein reflect a specific set of conservative assumptions

based on the expected construction scenario wherein a relatively large amount of construction is occurring in a relatively intensive manner. Because of this conservative assumption, actual emissions could be less than those forecasted. If construction is delayed or occurs over a longer time period, emissions could be reduced because of (1) a more modern and cleaner-burning construction equipment fleet mix than incorporated in the CalEEMod, and/or (2) a less intensive buildout schedule (i.e., fewer daily emissions occurring over a longer time interval).

Thus, the proposed modifications and delay in the construction schedule would not result in any increase to the previously reported construction emissions estimates. Table 2, *Maximum Daily Construction Emissions*, below is from the First Addendum and shows the construction emissions estimated to be generated by the Approved Project. Because construction emissions generated by the Revised Project would not be greater than those previously estimated for the Approved Project, these emissions totals conservatively represent the maximum anticipated daily emissions associated with the Revised Project. As shown, maximum daily emissions would not exceed County Screening Level Thresholds (SLTs; County 2007). SLTs and impacts would remain less than significant, and no changes to the impact conclusion related to air quality standards 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 Emissions[1]	***3.38***	***36.66***	***21.76***	***0.04***	***4.52***	***2.98***
Maximum Daily Emissions Reported in the Final 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**
Screening Level Threshold[3] (lbs/day)	*75*	*250*	*550*	*250*	*100*	*55*
Significant Impact?	***No***	***No***	***No***	***No***	***No***	***No***

[1] Proposed Project Emissions (CalEEMod)
[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.

Operation

The Revised Project proposes roadway improvements and an additional solar field 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.

Cumulatively Considerable Net Increase of Criteria Pollutants

As construction emissions of the Revised Project components would not exceed SLT thresholds, the Revised 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 Approved Project from construction equipment. Similar to the Approved 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 roadway improvements and an additional solar field 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 Approved 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 roadway improvements and a solar field 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 resulting from the Revised Project, a Second Addendum to the Biological Resources Technical Report was prepared (HELIX 2019c; Appendix B). The Second Addendum assessed the potential direct and indirect impacts on biological resources associated with the construction and operation of the Revised Project. The conclusions 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. However, the Revised Project proposes to revise mitigation measures MM-BIO-1 and MM-BIO-3 identified in the Final MND, which is discussed below under Sensitive Species.

Sensitive Species

Sensitive Plant Species

None of the special-status plant species analyzed in the Final MND have the potential to occur within the Revised Project study area. Impacts would be restricted to developed land, disturbed habitat (i.e., ruderal and weedy areas), and non-native vegetation. The four Torrey pines (*Pinus torreyana* ssp. *torreyana*) that are present on the SEWRF site would be avoided by the Revised Project. If the

appropriate avoidance and minimization measures are not implemented during construction, potential significant indirect impacts could occur to native habitat areas located off site and downstream of the Revised 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 impact conclusions for sensitive 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. Impacts would be restricted to developed land, disturbed habitat (i.e., ruderal and weedy areas), and areas 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-threatened species and state species of special concern, is not expected to use the non-native vegetation, disturbed habitat, and developed areas in and adjacent to the Revised Project study area but could use off-site Diegan coastal sage scrub (DCSS) located on portions of the steep slopes to the west and within 500 feet of construction areas. Designated critical habitat for the coastal California gnatcatcher overlays disturbed and developed land in the eastern portions of the SEWRF but does not support any DCSS habitat or the primary constituent elements of gnatcatcher critical habitat. The area is dominated by dense acacia and other non-native plant species. A few isolated native plant species were observed along the perimeter fence for the I-5 right-of-way and intermixed as one or two shrubs amongst the acacia and other non-native vegetation, but the isolated plants do not by themselves constitute DCSS or any other native habitat type. One of the Revised Project components, the solar field, is proposed in the critical habitat overlay area. However, due to the fact that this overlay area does not support DCSS habitat or the primarily constituent elements for gnatcatcher critical habitat, no adverse impacts or modification to the critical habitat overlay would occur. Mitigation measure MM-BIO-3 from the Final MND requires that the critical habitat be delineated by the project biologist and all structures be constructed outside of the delineated area as a means to avoid impacts to the listed coastal California gnatcatcher. However, due to the conditions of the critical habitat area within the SEWRF property (i.e., lack of suitable habitat to support the coastal California gnatcatcher), this measure is no longer applicable. Mitigation measure MM-BIO-3 is proposed to be revised to remove this specific avoidance measures as follows:

MM-BIO-3: Species Avoidance Measures

Torrey Pines

There are four Torrey pines on the project site. Prior to finalizing construction drawings, the trees and dripline shall be delineated by the project biologist. At a minimum, all structures shall be constructed no closer than 5 feet outside the dripline of the tree. The location of the trees, the trees' dripline, and 5-foot buffer around the trees' dripline shall be included on the construction drawings and demarcated in the field prior to on-site grading and construction activities.

California Sagebrush Alliance

There is a patch of Californian sagebrush alliance on the project site. Prior to finalizing construction drawings, the California sagebrush alliance shall be delineated by the project biologist, and all structures will be constructed outside of the delineated area. The location of the California sagebrush alliance will be included on the construction drawings and demarcated in the field prior to on-site grading and construction activities.

~~***Federally Designated Critical Habitat for Coastal California Gnatcatcher***~~

~~There are approximate 4 acres of federally designated critical habitat for coastal California gnatcatcher on the east side of the project site (see Appendix B). Prior to finalizing construction drawings, the critical habitat shall be delineated by the project biologist and all structures shall be constructed outside of the delineated area. The location of the critical habitat shall be included on the construction drawings and demarcated in the field prior to on-site grading and construction activities.~~

Similarly, mitigation measure MM-BIO-1 requires environmental awareness training to include conditions associated with California gnatcatcher critical habitat within the SEWRF property. As with mitigation measure MM-BIO-3 described above, this component of the mitigation measure is no longer applicable due to the conditions of the critical habitat area within the SEWRF property (i.e., lack of suitable habitat to support the coastal California gnatcatcher). Therefore, mitigation measure MM-BIO-1 is proposed to be revised to remove this specific avoidance measures as follows:

MM-BIO-1: Environmental Awareness Training

Prior to the initiation of on-site grading and construction activities, the project biologist shall conduct a Worker Environmental Awareness Program (WEAP) with the contractor. The project biologist shall perform the following:

1. Provide the training materials for WEAP training. These materials shall include the measures and mitigation requirements for biological resources, the location of special-status resources, ~~including federally designated critical habitat for coastal California gnatcatcher,~~ and designated work areas.

2. Copies of mitigation measures, and permits from resource agencies, if applicable, shall be made available by the project biologist.

3. Complete a timely review of construction schedules to ensure that timing/location of construction activities do not conflict with other measures or mitigation requirements (e.g., pre-construction nesting bird surveys).

4. Ensure that construction area boundary markers are placed to comply with applicable avoidance and/or buffer measure requirements, if necessary.

The least Bell's vireo (*Vireo bellii pusillus*), a federally- and state-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 areas. 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 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, MM-BIO-4, MM-BIO-5, MM-BIO-6, MM-BIO-7, MM-BIO-8, and MM-BIO-9. As noted above, implementation of the Revised Project proposes to revise mitigation measures MM-BIO-1 and MM-BIO-3.

The Revised Project is consistent with the impact conclusions 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. As discussed above, only a few native shrubs intermixed with weeds were present along the SEWRF eastern fence line and intermixed in isolated within the acacia-dominated vegetation during the June 2019 site visit. The previous study for the Final MND references a 0.3-acre patch of California sagebrush alliance on a *west-facing slope* on the site; however, the only California sagebrush alliance and DCSS confirmed in 2019 is on the *east-facing slope* in the western portions of the site. Review of Google Earth imagery from 2017 suggests that California sagebrush alliance may have occurred on the west-facing slope within the I-5 right-of-way further to the east of the project site; however, this off-site area was evidently impacted in late 2017 as part of the I-5 corridor construction efforts and no longer supports California sagebrush alliance or DCSS habitat. Thus, no direct impacts to riparian habitat or other sensitive natural community would occur as a result of the Revised Project.

As identified in the Final MND, potentially significant indirect impacts could occur to off-site DCSS 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 impact conclusions 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 adjacent to areas that will require improvements, including the frontage improvements at Manchester Avenue as part of the Revised Project and the driveway improvements at the SEWRF as part of the Approved Project. Wetlands within the Coastal Zone overlay in the City are protected by avoidance buffers that place restrictions on new development and disturbances that occur within the buffer areas. The Manchester Avenue and SEWRF driveway improvements occur within existing wetland buffers. However, as required, the improvements have been specifically designed to restrict all new development and disturbances to the existing disturbed and developed land associated with the Manchester Avenue right-of-way and SEWRF driveway, thereby avoiding any impact and preserving the biological integrity of the existing wetland buffers.

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.

The Revised Project is consistent with the impact conclusions 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 freeway.

The location of the proposed solar field would not substantially interfere with the movement of any resident or migratory fish or wildlife species. The solar field is proposed in an area that is generally located to the east of the SEWRF on land comprised of disturbed habitat and non-native vegetation. Perimeter fencing currently exists around the SEWRF preventing wildlife from entering or leaving any native habitat adjacent to the project area via the SEWRF. Therefore, the SEWRF, in its current condition, does not allow any mitigatory species to pass through the area.

The intersection improvements would occur in a developed area, in and near 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 described within the Final MND, the potential impacts on wildlife movement as a result of the proposed solar field and intersection improvements would be less than significant. Nevertheless, implementation of mitigation measures MM-BIO-1 and MM-BIO-2 from the Final MND would further reduce potential effects to wildlife.

The impact conclusions described in the Final MND for wildlife movement and migratory species are consistent with those of the Revised Project.

Local Policies and Ordinances

The Revised Project would not conflict with any local policies or ordinances protecting biological resources. The Revised Project has been designed to maintain consistency with the City's wetland buffer policies. Wetlands exist off site and adjacent to the Manchester Avenue intersection improvements component of the Revised Project and the SEWRF driveway component of the Approved Project. By way of their adjacency, these components occur within the buffers for these off-site resources. However, as required, the improvements have been specifically designed to restrict all new development and disturbances to the existing disturbed and developed land associated with the Manchester Avenue right-of-way and SEWRF driveway, thereby avoiding any impact and preserving the biological integrity of the existing wetland buffers.

The impact conclusions for local policies and ordinances described in the Final MND are consistent with those of the Revised Project.

Adopted Habitat Conservation Plans

The Revised Project would not conflict with the provisions of such plans; no adopted plans apply to the Revised Project or SEJPA. The Revised Project does occur within the planning boundaries of the City's Draft Multiple Habitat Conservation Program (MHCP) Subarea Plan, which identifies a Hardline Focused Planning Area (FPA) occurring immediately west of the SEWRF. The Revised Project will have no impact on this draft FPA and would not conflict with the provisions or preclude the future adoption of the City's Draft MHCP Subarea Plan. The trail component of the Approved Project has been setback from the draft FPA area and has further received a CDP amendment from the California Coastal Commission to reconfigure the open space easement recorded over the slope within the FPA overlay in a superior manner. The amended easement configuration is biologically superior and would enhance the planned FPA function in that it protects a more-contiguous habitat area. Further, mitigation measures MM-BIO-1, MM-BIO-2, MM-BIO-4, MM-BIO-5, and MM-BIO-7 would be implemented to ensure off-site biological resources of value, including those within the draft FPA overlay, are protected from indirect effects.

The impact conclusions described in the Final MND for adopted habitat conservation plans are consistent with those of 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. Furthermore, revised mitigation measures MM-BIO-1 and MM-BIO-3 do not constitute any new significant environmental impacts or substantial new information.

Cultural and Tribal Cultural Resources

To analyze the potential cultural and tribal cultural impacts resulting from the Revised Project, a Cultural Resources Technical Letter Report was prepared for the Revised Project Area of Potential Effect (APE) (HELIX 2019d; 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 were 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 impact conclusions for historic resources described in the Final MND.

Cultural and Tribal Cultural Resources

No archaeological resources were identified within the project area as analyzed in the Final MND. The locations for the Revised Project components lie in areas recently surveyed and evaluated for cultural resources (within the last five years). The first of these studies was performed by Dudek in 2016 for the SEWRF Upgrades Project in support of the Final MND. The second study was performed by HELIX in 2019

for the Addendum 1 to the Final MND. The third study was performed by HELIX in 2015 for the nearby San Elijo Land Outfall Replacement Project. As such, an analysis of the potential for impacts to cultural resources was accomplished without additional field survey based on the results of these recent previous studies.

The study performed by Dudek for the Final MND included an intensive pedestrian field of the entire area of the SEWRF. This survey included the area of the SEWRF proposed for the new solar array field in the current Revised Project. The results from the Dudek survey were negative for cultural resources in this area of the SEWRF. Contact with the Native American Heritage Commission (NAHC) for a Sacred Lands File (SLF) search and subsequent outreach letters sent to Native American representatives and interested parties identified by the NAHC resulted in no specific sacred site concerns related to the proposed project as analyzed in the Final MND. The 2019 study performed by HELIX included field surveys of expanded areas resulting from the upgrades proposed in the first addendum that were beyond the SEWRF boundary surveyed by Dudek for the Final MND. These expanded areas included a portion of the proposed upgrades within the SEWRF driveway and intersection with Manchester Avenue. The NAHC was contacted for a SLF search and subsequent outreach letters were sent to Native American representatives and interested parties identified by the NAHC. This outreach resulted in no specific sacred site concerns related to the revised project area.

One previously recorded prehistoric archaeological site, CA-SDI-6850, has been documented in the vicinity of the proposed upgrades within the intersection within Manchester Avenue and the driveway into the San Elijo Lagoon Visitor's Center. A field survey conducted as part of the 2015 HELIX study did not observe evidence for the presence of the site. HELIX recommended a program of cultural resources monitoring during the Outfall Pipeline Replacement project in 2018, and the results were negative. As with the Approved 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 (including remnants of site CA-SDI-6850) may still be present in the Revised Project APE. The potential for impacts to archaeological resources would not increase as a result of the Revised Project. Therefore, impacts to cultural and tribal cultural resources would remain potentially significant, and MM-CUL-1 described for the Approved 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 impact conclusions for cultural and tribal resources described in the Final MND.

Paleontological Resources

Similar to the Approved Project, the Revised Project components would occur in mostly developed or disturbed areas. As with the Approved Project, there is potential to encounter unknown paleontological resources during ground disturbing activities for the Revised Project components. Therefore, impacts to paleontological resources resulting from 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 impact conclusions 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 areas previously tested for the Approved Project. Similar to the Approved Project, if human remains are encountered, compliance with California Health and Safety Code Section 7050.5. would be required. Therefore, impacts would remain less than significant, and the Revised Project is consistent with the impact conclusions 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 Approved 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. Therefore, impacts would be less than significant, and the Revised Project is consistent with the impact conclusions for rupture of a known earthquake fault described in the Final MND.

Strong Seismic Ground Shaking

Similar to the Approved 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. Therefore, impacts would be less than significant, and the Revised Project is consistent with the impact conclusions 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 constructed in compliance with the California Building Code to minimize liquefaction risk. Therefore, impacts would be less than significant, and the Revised Project is consistent with the impact conclusions 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 site 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 constructed in compliance with the California Building Code to reduce potential landslide hazards. Therefore, impacts would be less than significant and the Revised Project is consistent with the impact conclusions 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 with the Approved Project, completion of a Storm Water Pollution Prevention Plan (SWPPP) in accordance with the Statewide Construction General Permit would be required for construction of the Revised Project. 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 Approved Project, the Revised Project would be constructed in compliance with the California Building Code 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 constructed in compliance with the California Building Code 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 Approved 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 impact conclusions for wastewater disposal systems described in the Final MND.

Greenhouse Gas Emissions

Greenhouse Gas Emissions

Construction

As discussed under Air Quality, construction emissions generated by the Revised Project would not be greater than those previously estimated for the Approved Project. Therefore, the CalEEMod emissions modeled for the Approved Project conservatively represent emissions generated by the Revised Project.

Similar to the Approved Project, 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.

The estimated construction GHG emissions for the Revised 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) CO_2e, resulting in approximately 24.06 MT CO_2e per year.

Table 3
TOTAL CONSTRUCTION GREENHOUSE GAS EMISSIONS

Construction Year	Total CO_2e (Metric Tons)
2019	145.73
2020	122.29
Proposed Project Total Emissions[1]	***268.02***
Total Emissions Reported in the Final MND[2]	213.25
Revised Total Construction Emissions[3]	**481.27**
Amortized Construction Emissions[4]	*24.06*

[1] Proposed Project Emissions (CalEEMod)
[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 representative of the Revised Project. The emissions include the amortized annual construction emissions previously anticipated for the Approved Project. As stated above and discussed in greater detail under Air Quality, the proposed modifications of the Revised Project would not change the previously estimated operational emissions. As shown in Table 4, the Revised Project would result in annual GHG emissions no greater than 122.11 MT CO_2e. Therefore, the total operational emissions would not exceed the 900 MT CO_2e per year screening threshold used in the Final MND and impacts would remain less than significant. The Revised Project is consistent with the impact conclusions for GHG emissions described in the Final MND.

Table 4
TOTAL OPERATIONAL GREENHOUSE GAS EMISSIONS

Emissions	Total CO_2e (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**
Screening Threshold[2]	*900 MT CO_2e per year*
Significant Impact?	***No***

[1] Previously Reported MND Emissions (SEJPA 2016; Page 58, Table 3.7-2)
[2] County 2015

Greenhouse Gas Plans

The Approved Project 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 Approved Project would not increase GHG emissions above thresholds (e.g., the 900 MT CO_2e threshold) and would be consistent with zoning and land use designations, the Approved Project was considered to be consistent with these plans. Similarly, the Revised Project also would not increase emissions above applicable thresholds, as shown in Table 4, and also would be consistent with the zoning and land use designations of the project site. Therefore, impacts resulting from the Revised Project to the aforementioned GHG plans would be less than significant and would be consistent with the impact conclusions 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 Approved Project, 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 Approved 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. Therefore, impacts would be less than significant, and the impact conclusions for water quality described in the Final MND are consistent with those of the Revised Project.

Groundwater Supplies

A small portion of the intersection improvements would convert a pervious land cover to an impervious land cover. Similar to the Approved Project, 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 impact conclusions for groundwater supplies described in the Final MND are consistent with those of the Revised Project.

Erosion

Construction of the intersection improvements and solar field would convert a small portion of pervious land cover to an impervious land cover, but this would not significantly alter the existing drainage pattern of the site. During construction, a SWPPP would implement stormwater BMPs to ensure that substantial erosion or siltation would not occur on- or off-site. During operation, rainwater would be collected by existing storm drain facilities 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 impact conclusions for erosion from drainage alteration described in the Final MND are consistent with those of the Revised Project.

Runoff

Construction of the Revised Project would not significantly alter the existing drainage pattern of the site through construction of new impervious surfaces. 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 via the existing storm drain. As with the Approved 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 impact conclusions for runoff from drainage alteration described in the Final MND are consistent with those of the Revised Project.

100-year Flood Hazard Areas

As with the Approved Project, the Revised Project would not include structures or housing within a 100-year flood hazard area. No impacts would occur, and the impact conclusions for flood areas described in the Final MND are consistent with those of the Revised Project.

Levee or Dam Failure

As with the Approved 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 impact conclusions for levee and dam failure as described in the Final MND are consistent with those of the Revised Project.

Seiche, Tsunami, or Mudflow Hazards

As with the Approved Project, the Revised Project would not be located in an area susceptible to seiche or tsunami hazards. No impacts would occur, and the impact conclusions for seiche, tsunami, and mudflow hazards as described in the Final MND are consistent with those of 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

The proposed modifications of the Revised Project do not include components that would generate substantial noise. Therefore, permanent noise impacts would remain less than significant, and the impact conclusions for noise described in the Final MND are consistent with those of the Revised Project.

Temporary Increase in Noise

Similar to the Approved Project, temporary noise would be created during construction of the Revised Project from heavy construction machinery such as a large bulldozer. Construction of the intersection improvements would occur within 175 feet of the closest residences to the west. As discussed in the First Addendum, the modeled noise levels at the nearest residences would be 71.7 A-weighted decibels (dBA) one-hour equivalent (L_{EQ}) (with a conservative assumption that equipment would all be operating at the closest distance to the nearest residences to the west at the same time), which would be below the 75-dBA threshold for the City of Encinitas. In addition, the Revised 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 impact conclusions for construction noise described in the Final MND are consistent with those of the Revised Project.

Vibration

Similar to the Approved Project, vibration would be created during construction of the Revised Project from heavy construction machinery such as large bulldozer. The Final 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. Revised 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 impact conclusions for vibration described in the Final MND are consistent with those of 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 impact conclusions for airport noise described in the Final MND are consistent with those of 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.

Transportation and Traffic

Circulation System Effectiveness

Similar to the Approved Project, the majority of traffic impacts associated with the Revised Project would be limited to temporary construction impacts due to associated construction vehicles entering and exiting SEWRF from Manchester Avenue. As discussed under Air Quality, the construction assumptions utilized in the analysis of the Approved Project would remain applicable for the Revised Project—the only difference is that the construction start date has been delayed. Therefore, the analysis contained in the Addendum to the Air Quality and Greenhouse Gas Emissions Impact Assessment (HELIX 2018) is conservatively representative of the Revised Project. Based on that previous analysis, 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 at 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).

Operation of the traffic signals would improve pedestrian safety and traffic circulation, but may require additional stoppage for vehicles on the street. However, this would not impact the LOS operation of the roadway.

Therefore, traffic circulation impacts would remain less than significant, and the impact conclusions for traffic circulation described in the Final MND are consistent with those of 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 Approved Project, the Revised Project would not have a significant impact on congestion management plans. The less-than-significant impact conclusion for congestion management programs described in the Final MND are consistent with those of 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 impact conclusions for air traffic hazards described in the Final MND are consistent with those of the Revised Project.

Traffic Design Hazards

The Revised Project would add a traffic signal at the Manchester Avenue and SEWRF facility intersection to improve pedestrian safety and traffic circulation. Therefore, through project design, no traffic design

hazards would result from the Revised Project components, and impacts would be less than significant. The impact conclusions for traffic design hazards described in the Final MND are consistent with those of the Revised Project.

Inadequate Emergency Access

Construction of the Manchester Avenue/SEWRF intersection improvements may result in short-term lane closures. This work would be temporary 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 impact conclusions for emergency access described in the Final MND are consistent with those of 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, and connectivity along at least one side of the road would be maintained during construction. Construction of the improvements on Manchester Avenue would improve traffic circulation and optimize pedestrian access and safety. Therefore, no impacts would occur, and the impact conclusions for public transit, bicycle, and pedestrian facility plans described in the Final MND are consistent with those of 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 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 to the circumstances regarding the Revised Project that would require revisions to the Final MND due to new significant environmental effects or a substantial increase in the severity of previously identified significant effects. There is no new information of substantial importance which shows that the Revised 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.

REFERENCES

City of Encinitas

2018 2013-2021 Housing Element Update. Environmental Assessment.

County of San Diego (County)

2019 Climate Action Plan.

2015 2015 GHG Guidance – Recommended Approach to Addressing Climate Change in CEQA Documents.

2007 Guidelines for Determining Significance and Report Format and Content Requirements – Air Quality.

Department of Conservation (California)

1986 Landslide Hazards in the Encinitas Quadrangle, San Diego County, California. Available at: ftp://ftp.consrv.ca.gov/pub/dmg/pubs/ofr/OFR_86-08/OFR_86-08.pdf

Dudek

2016 Final Mitigated Negative Declaration for the San Elijo Water Reclamation Facility Upgrades. April.

HELIX Environmental Planning, Inc

2019a Addendum to the Final Mitigated Negative Declaration for the San Elijo Water Reclamation Facility Upgrades. January.

2019b Supplement to the Addendum to the Air Quality and Greenhouse Gas Emissions Impact Assessment for the San Elijo Water Reclamation Facility Upgrades Project. August 14.

2019c Second Addendum to the Biological Resources Technical Report for the San Elijo Water Reclamation Facility Upgrades Project in the City of Encinitas. August 15.

2019d Cultural Resources Technical Letter Report for the San Elijo Water Reclamation Facility Upgrades Project in the City of Encinitas. August 14.

2018 Addendum to the Air Quality and Greenhouse Gas Emissions Impact Assessment for the San Elijo Water Reclamation Facility Upgrades Project. December 4.

Appendix A

Supplement to the Addendum to the Air Quality and Greenhouse Gas Emissions Impact Assessment

Memorandum

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HELIX Environmental Planning

Date: August 9, 2019

To: Michael T. Thornton, P.E.
General Manager
San Elijo Joint Powers Authority
2695 Manchester Avenue
Cardiff-by-the-Sea
California 92007-7077

From: Victor Ortiz, Senior Air Quality Specialist, HELIX Environmental Planning, Inc.

Subject: Supplement to the Addendum to the Air Quality and Greenhouse Gas Emissions Impact Assessment for the San Elijo Water Reclamation Facility Upgrades Project

HELIX Proj. No.: KHA-37

Message:

Since the completion of the December 20, 2018 *Addendum to the Air Quality and Greenhouse Gas Emissions Impact Assessment for the San Elijo Water Reclamation Facility Upgrades Project* (Addendum), the project description has been revised to replace the previously proposed pedestrian-activated traffic control device with a signalized intersection at Manchester Avenue and the facility's driveway. Based on construction information provided by the design team, this change does not affect the assumed construction phasing duration, phasing sequencing, or equipment described in Tables 1 and 2 of the Addendum[1]. The delays experienced by the project planning process have, however, delayed the overall construction start date, previously assumed to be August 1, 2019. As described in the Addendum,

> *The quantity, duration, and the intensity of construction activity influence the amount of construction emissions and their related pollutant concentrations that occur at any one time. As such, the emission forecasts provided herein reflect a specific set of conservative assumptions based on the expected construction scenario wherein a relatively large amount of construction is occurring in a relatively intensive manner. Because of this conservative assumption, actual emissions could be less than those forecasted. If construction is delayed or occurs over a longer time period, emissions could be reduced because of (1) a more modern and cleaner-burning construction equipment fleet mix than incorporated in the CalEEMod, and/or (2) a less intensive buildout schedule (i.e., fewer daily emissions occurring over a longer time interval).*

The changes to the project description and delay to the construction schedule would not result in any increase to the previously reported construction emission estimates and impacts would remain less than significant.

[1] San Elijo Joint Powers Authority (SEJPA). 2019. Phone call July 22 regarding PCL Construction methods, equipment, and schedule.

Appendix B

Second Addendum to the Biological Resources Technical Report

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August 15, 2019 KHA-37

Michael T. Thornton, P.E.
General Manager
San Elijo Joint Powers Authority
2695 Manchester Avenue
Cardiff-by-the-Sea, CA 92007-7077

Subject: Second Addendum to Biological Resources Technical Report for the San Elijo Water Reclamation Facility Upgrades Project in the City of Encinitas

Dear Mr. Thornton:

HELIX Environmental Planning, Inc. (HELIX) has prepared this biological resources letter report in support of the second addendum to the Final Mitigated Negative Declaration (MND) for the San Elijo Water Reclamation Facility Upgrades Project, proposed by the San Elijo Joint Powers Authority (SEJPA; Dudek 2016).

The project analyzed in the Final MND included various upgrades, rehabilitations, and replacements for components of the San Elijo Water Reclamation Facility (SEWRF) located in Cardiff-by-the-Sea in the City of Encinitas, California. The first addendum to the MND addressed project modifications, including a proposed shared-use trail, intersection improvements at Manchester Avenue, and general solar field relocation, with an anticipated construction start date of August 2019. These modifications, as well as the other improvements originally proposed in the Final MND, are herein referred to as the Approved Project. This updated analysis was prepared to address proposed modifications to the Approved Project, including additional information on the solar field in the southeastern portion of the SEWRF site and a redesign of SEWRF frontage and intersection improvements at Manchester Avenue. The Approved Project with these proposed modifications is herein referred to as the Revised Project.

HELIX 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 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 and associated biological resources technical report. The assessment further found that the Revised Project would require a modification to the previously identified mitigation measures MM-BIO-1 and MM-BIO-3, which is discussed in greater detail below. This letter summarizes the findings for biological resources.

PROJECT LOCATION

The Revised Project occurs within and immediately adjacent to SEJPA's SEWRF located at 2965 Manchester Avenue in the City of Encinitas, California. The site is generally located north of the San Elijo Lagoon, south of Birmingham Drive, east of the Pacific Ocean, and west of Interstate 5 (I-5) (Figure 1). The site is situated within Township 13 South, Range 4 West, Sections 26 and 27 of the Encinitas U.S. Geological Survey (USGS) topographic quadrangle map (Figure 2). The site occurs within Assessor's Parcel Number (APN) 261-010-1302, mostly within existing disturbed and developed portions of the SEWRF, its driveway intersection with Manchester Avenue, and the San Elijo Lagoon Visitor's Center driveway intersection with Manchester Avenue (Figure 3).

PROJECT DESCRIPTION

Only those components that represent changes to the Approved Project are addressed in this analysis, which include: (1) additional information regarding the proposed solar field in the southeastern portion of the SEWRF property; and (2) redesign of SEWRF entrance improvements along Manchester Avenue. In addition and specific to biological resources, this analysis confirms the location of SEWRF driveway and Manchester Avenue intersection improvements to be restricted within existing disturbed and developed land where they occur within an existing buffer for off-site wetland resources.

The proposed solar field would be located in the southeastern corner of the SEWRF site and would consist of ground-mounted solar photovoltaic (PV) panels within areas cleared of vegetation and adjacent to existing water treatment infrastructure. The southern end of the proposed solar fields is adjacent to a stand of acacia (Acacia sp.) trees (i.e., non-native vegetation) that would provide a visual screen of the SEWRF for the residential neighborhood to the south. The solar field would consist of an array of typical ground-mounted solar PV panels and associated mounting supports. These types of solar panels are low-profile and not highly reflective.

Proposed frontage improvements would include a traffic signal and surface improvements within Manchester Avenue public right-of-way to facilitate pedestrian crossing of the SEWRF driveway and Manchester Avenue as well as to incorporate green street features. The traffic signal would include the following components:

- Fully-actuated traffic signal with virtual detection (cameras) on each intersection leg;
- Signal masts with intersection safety lighting; and
- "Traffic Signal Ahead" signs with solar-powered beacons at both intersection approaches along Manchester Avenue.

Proposed surface improvements would include:

- Curb and gutter along the frontage of the SEWRF from the westerly property line to the west side of the SEWRF's entrance driveway;

- Americans with Disabilities Act (ADA)-compliant pedestrian ramps, high-visibility crosswalks, and pedestrian signals within the public right-of-way to cross the SEWRF driveway and to cross Manchester Avenue at the east side of the driveway;

- Curb, gutter, sidewalk and ADA-compliant directional pedestrian ramps at the east side of the SEWRF's driveway and at the east side of the entrance to the San Elijo Lagoon Ecological Reserve and Regional Park and Nature Center on the south side of Manchester Avenue;

- New asphalt concrete (AC) paving between the existing AC paving and the new curb and gutter and within the SEWRF's entrance;

- A biofiltration basin along the SEWRF frontage to detain and treat roadway runoff and urban runoff that enters the SEWRF site from the west; and

- Removal of an existing grated inlet near the northwest corner of the intersection, extension of an existing storm drain pipe, and construction of a new inlet structure to serve the biofiltration basin and to remove tributary storm water runoff from the roadway via curb cuts that is not diverted to the biofiltration basin.

METHODS

HELIX Biologist Amy Mattson conducted a nesting bird and general biological survey at the site on June 20, 2019. Ms. Mattson surveyed the site looking for nesting birds and special status plants, animals, and vegetation communities. Ms. Mattson also referred to aerial imagery of the site (Google Earth 2019); previous biological resources data (Dudek 2016); and online databases such as California Natural Diversity Database (CNDDB), California Native Plant Society, and California Department of Fish and Wildlife (CDFW) for any new observations of special status species in the direct vicinity of the site (CDFW 2018; CDFW 2019; CNPS 2018). Ms. Mattson was able to verify that conditions had not changed since those reported in the Final MND (Dudek 2016), with the exception of weed abatement areas in the eastern corner of the SEWRF.

EXISTING CONDITIONS SUMMARY

The SEWRF was originally built in 1965 and has been owned and operated by SEJPA since that time. The original plant provided primary wastewater treatment only. The plant has evolved over the years to meet the needs of the growing community and changing environmental regulations. The SEWRF site has been developed in its current condition and configuration for 24 years. The plant currently processes wastewater and some storm water, and serves a water reclamation function for the surrounding communities, and processes up to 5.25 million gallons of water per day. Most of the SEWRF property is comprised of developed land and highly disturbed areas that are regularly maintained and characterized by bare earth, non-native ruderal (weedy) vegetation, and facility landscaping. The SEWRF is located within high fire hazard areas and as such the SEJPA manages the fire threat through annual weed abatement vegetation trimming activities. Weed abatement in the eastern side of the SEWRF was most recently conducted in June 2019. Vegetation removed included a stand of non-native vegetation (primarily acacia shrubs), an area comprised of non-native grasses and herbaceous weeds, and a small strip of native shrubs intermixed with weeds that were along the southern fence line. The steep slopes located in the extreme western portion of the SEWRF property contain pockets of native Diegan coastal

sage scrub (DCSS) that are intermixed with non-native ornamental escapees from the local area. Riparian habitat occurs off site further to the southeast of the SEWRF property, as does riparian, wetland, and coastal saltmarsh habitat associated with the San Elijo Lagoon off site further to the south. A brief summary of the existing biological conditions within the Revised Project study area (i.e., the anticipated footprints associated with the project modifications, including the solar field and the SEWRF frontage improvements at Manchester Avenue) is included below.

Diegan Coastal Sage Scrub

DCSS is one of the two major vegetation communities, dominated by shrubs, that occur in southern California, occupying xeric sites characterized by shallow soils (the other is chaparral). DCSS may be dominated by a variety of species depending upon soil type, slope, and aspect. Typical species found within DCSS include California sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), laurel sumac (*Malosma laurina*), lemonadeberry (*Rhus integrifolia*), white sage (*Salvia apiana*), and black sage (*Salvia mellifera).*

There is no DCSS in the Revised Project study area. A few native shrubs remained along the SEWRF fence line in June 2019 and these were removed during weed abatement required for fire hazard management. DCSS species observed west of the project site on the western slope include laurel sumac, black sage, California sagebrush, California buckwheat, and lemonadeberry. These species are intermixed with several non-native ornamental and invasive species.

The DCSS west of the project site is relatively dense and situated on a steep, east-facing slope. Based on studies completed to date, the DCSS is not likely to support any special status plant species and has a low-to-moderate potential to support several special status wildlife species. Database records exist for the coastal California gnatcatcher off-site and nearby in association with better quality stands around San Elijo Lagoon and adjacent habitat. Due to the abundance of non-native plant species and absence of special-status species during survey efforts, the DCSS does not meet the criteria to be considered Environmentally Sensitive Area under Section 30107.5 of the Coastal Act, although it does provide biological functions and values. As part of Coastal Development Permit (CDP) #6-89-284 some of this area has been placed into an open space conservation easement and, as part of the Approved Project trail component, SEJPA has obtained an amendment to this CDP from the California Coastal Commission to provide for a superior configuration of the easement.

Non-Native Vegetation

Non-native vegetation includes areas dominated by non-native plant species. These areas include stands of ornamental landscaping or groups of non-natives that have escaped and recruited into native areas. Dominant non-native species observed within the project area include eucalyptus (*Eucalyptus* sp.), Canary Island date palm (*Phoenix canariensis*), acacia (*Acacia retinodes*), ice plant (*Carpobrotus edulis*), castor bean (*Ricinus communis*), tree tobacco (*Nicotiana glauca*), and Mission cactus (*Opuntia ficus-indica*). Acacia was the dominant non-native species observed within the Revised Project study area. A small stand remains near the southern fence line.

Disturbed Habitat

Disturbed habitat includes areas with ground surface disturbance, where a soil substrate is retained. Where vegetation is present, it supports an assemblage of almost exclusively non-native, weedy, upland species that colonize after disturbance. Disturbed habitat occurs within the SEWRF in areas that are maintained and used by SEJPA during ongoing operations. Where vegetation is present, species observed include acacia, star thistle (*Centaurea melitensis*), ice plant, castor bean, tree tobacco, wild cucumber (*Marah macrocarpa*), and Russian thistle (*Salsola tragus*). Scattered and isolated natives observed include species such as California buckwheat and coastal prickly pear (*Opuntia littoralis*). Within the footprint of the solar field, disturbed habitat is dominated by non-native grasses and herbaceous weeds.

Developed Land

Developed land includes areas where there is a permanent alteration to the land due to development and other significant disturbances. Developed land may include areas supporting ornamental landscaping. Within the project area, developed land includes existing graded, paved, concrete lined, and landscaped areas within the SEWRF. Ornamental trees, shrubs, and turf grasses present in landscaped areas are also considered developed. Within the Revised Project study area, Manchester Avenue and adjacent areas are developed land.

Jurisdictional Resources

An existing concrete-lined flood control channel runs north-south on the west side of the SEWRF. The trapezoidal-shaped channel is entirely lined with concrete and devoid of vegetation and sediment. The channel has been utilized for flood control purposes and conveyance of run-on through the SEWRF for decades. The flood control channel has downstream connectivity to the San Elijo Lagoon, and as such, represents non-wetland waters of the U.S./State subject to the regulatory jurisdiction of the U.S. Army Corps of Engineers (USACE) and Regional Water Quality Control Board (RWQCB), and concrete streambed subject to the regulatory jurisdiction of the CDFW. The Revised Project study area does not occur within or adjacent to this channel. The concrete-lined channel was subject of recent permitted activities as part of SEJPA's land outfall replacement project. In addition, the channel was subject of recent permits and approvals issued by the USACE, RWQCB, and CDFW for trail components associated with the Approved Project.

PROJECT IMPACTS SIGNIFICANCE AND PROPOSED MITIGATION

Potential impacts related to the Revised Project are described below.

Direct Impacts

No new significant or adverse direct impacts are identified for the Revised Project compared to those analyzed for the Approved Project in the first addendum and Final MND. Implementation of the mitigation measures identified in the Final MND would ensure that potential significant direct impacts are reduced to less than significant levels.

Indirect Impacts

As with the direct impacts, no new significant or adverse indirect impacts are identified for the Revised Project compared to those analyzed in the first addendum and Final MND. Implementation of the mitigation measures identified in the Final MND would ensure that potential significant indirect impacts are also reduced to less than significant levels.

Impact Significance Analysis

This section discussed how the potential direct and indirect significant impacts of the Revised Project would be mitigated with implementation of relevant mitigation measures from the Final MND (Dudek 2016).

Threshold BIO-1

Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate sensitive, or special-status species in local or regional plans, policies, or regulations, or by the CDFW or United States Fish and Wildlife Service (USFWS)?

Plant Species

None of the special-status plant species analyzed in the Final MND have the potential to occur within the Revised Project study area. Impacts would be restricted to developed land, disturbed habitat (i.e., ruderal and weedy areas), and non-native vegetation. The four Torrey pines (*Pinus torreyana* ssp. *torreyana;* CRPR 1B.2) that are present on the SEWRF site would be avoided by the Revised Project. If the appropriate avoidance and minimization measures are not implemented during construction, potential significant indirect impacts could occur to native habitat areas located off site and downstream of the revised 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.

Animal 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 study area. Impacts would be restricted to developed land, disturbed habitat (i.e., ruderal and weedy areas), and areas dominated by non-native vegetation 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-threatened species and state species of special concern, is not expected to use the non-native vegetation, disturbed habitat, and developed areas in and adjacent to the Revised Project study area, but could use off-site DCSS located on portions of the steep slopes to the west and within 500 feet of construction areas. Designated critical habitat for the coastal California gnatcatcher overlays disturbed and developed land in the eastern portions of the SEWRF, but does not support any DCSS habitat or the primary constituent elements of gnatcatcher critical habitat. The area is dominated by dense acacia and other non-native plant species. A few isolated native plant species were observed along the perimeter fence for the I-5 Caltrans right-of-way and intermixed as one or two

shrubs amongst the acacia and other non-native vegetation, but the isolated plants do not by themselves constitute DCSS or any other native habitat type. One of the Revised Project components, the solar field, is proposed in the critical habitat overlay area. However, due to the fact that this overlay area does not support DCSS habitat or the primarily constituent elements for gnatcatcher critical habitat, no adverse impacts or modification to the critical habitat overlay would occur. Mitigation measure MM-BIO-3 from the Final MND requires that the critical habitat be delineated by the project biologist and all structures be constructed outside of the delineated area as a means to avoid impacts to the listed coastal California gnatcatcher. However, due to the conditions of the critical habitat area within the SEWRF property (i.e., lack of suitable habitat to support the coastal California gnatcatcher), this measure is no longer applicable. Mitigation measure MM-BIO-3 is proposed to be revised to remove this specific avoidance measures as follows:

MM-BIO-3: Species Avoidance Measures

Torrey Pines

There are four Torrey pines on the project site. Prior to finalizing construction drawings, the trees and dripline shall be delineated by the project biologist. At a minimum, all structures shall be constructed no closer than 5 feet outside the dripline of the tree. The location of the trees, the trees' dripline, and 5-foot buffer around the trees' dripline shall be included on the construction drawings and demarcated in the field prior to on-site grading and construction activities.

California Sagebrush Alliance

There is a patch of Californian sagebrush alliance on the project site. Prior to finalizing construction drawings, the California sagebrush alliance shall be delineated by the project biologist, and all structures will be constructed outside of the delineated area. The location of the California sagebrush alliance will be included on the construction drawings and demarcated in the field prior to on-site grading and construction activities.

~~***Federally Designated Critical Habitat for Coastal California Gnatcatcher***~~

~~There are approximate 4 acres of federally designated critical habitat for coastal California gnatcatcher on the east side of the project site (see Appendix B). Prior to finalizing construction drawings, the critical habitat shall be delineated by the project biologist and all structures shall be constructed outside of the delineated area. The location of the critical habitat shall be included on the construction drawings and demarcated in the field prior to on-site grading and construction activities.~~

Similarly, mitigation measure MM-BIO-1 requires environmental awareness training to include conditions associated with California gnatcatcher critical habitat within the SEWRF property. As with mitigation measure MM-BIO-3 described above, this component of the mitigation measure is no longer applicable due to the conditions of the critical habitat area within the SEWRF property (i.e., lack of suitable habitat to support the coastal California gnatcatcher). Therefore, mitigation measure MM-BIO-1 is proposed to be revised to remove this specific avoidance measures as follows:

MM-BIO-1: Environmental Awareness Training

Prior to the initiation of on-site grading and construction activities, the project biologist shall conduct a Worker Environmental Awareness Program (WEAP) with the contractor. The project biologist shall perform the following:

1. Provide the training materials for WEAP training. These materials shall include the measures and mitigation requirements for biological resources, the location of special-status resources, ~~including federally designated critical habitat for coastal California gnatcatcher,~~ and designated work areas.

2. Copies of mitigation measures, and permits from resource agencies, if applicable, shall be made available by the project biologist.

3. Complete a timely review of construction schedules to ensure that timing/location of construction activities do not conflict with other measures or mitigation requirements (e.g., pre-construction nesting bird surveys).

4. Ensure that construction area boundary markers are placed to comply with applicable avoidance and/or buffer measure requirements, if necessary.

The least Bell's vireo (*Vireo bellii pusillus*), a federally- and state-endangered species, is identified as having 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 areas. 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 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, MM-BIO-4, MM-BIO-5, MM-BIO-6, MM-BIO-7, MM-BIO-8, and MM-BIO-9. As noted above, implementation of the Revised Project proposes to revise mitigation measures MM-BIO-1 and MM-BIO-3.

Threshold BIO-2

Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS?

No riparian habitat or other sensitive natural community occurs within the Revised Project study area. As discussed above, only a few native shrubs intermixed with weeds were present along the SEWRF eastern fence line and intermixed in isolated within the acacia-dominated vegetation during the June 2019 site visit. The previous study for the Final MND references a 0.3-acre patch of California sagebrush alliance on a *west-facing slope* on the site; however, the only California sagebrush alliance and DCSS confirmed in 2019 is on the *east-facing slope* in the western portions of the site. Review of Google Earth imagery from 2017 suggests that California sagebrush alliance may have occurred on the west-facing slope within the Caltrans I-5 right-of-way further to the east of the project site; however, this off-site area was evidently impacted in late 2017 as part of the I-5 corridor construction efforts and no longer

supports California sagebrush alliance or DCSS habitat. Thus, no direct impacts to riparian habitat or other sensitive natural community would occur as a result of the Revised Project.

If the appropriate avoidance and minimization measures are not implemented during construction, potential significant indirect impacts could occur to off-site DCSS and other off-site sensitive habitat located downstream in association with San Elijo Lagoon. These 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.

Threshold BIO-3

Would the project have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No wetlands occur within the Revised Project study area; none are present within the SEWRF property. Therefore, no direct impacts to wetlands would occur. Wetlands do occur off site and adjacent to areas that will require improvements, including the frontage improvements at Manchester Avenue as part of the Revised Project and the driveway improvements at the SEWRF as part of the Approved Project. Wetlands within the Coastal Zone overlay in the City are protected by avoidance buffers that place restrictions on new development and disturbances that occur within the buffer areas. The Manchester Avenue and SEWRF driveway improvements occur within existing wetland buffers. However, as required, the improvements have been specifically designed to restrict all new development and disturbances to the existing disturbed and developed land associated with the Manchester Avenue right-of-way and SEWRF driveway, thereby avoiding any impact and preserving the biological integrity of the existing wetland buffers.

As with the Approved Project, if avoidance measures and BMPs are not implemented during construction, potential significant indirect impacts could occur during construction of the Revised Project to off-site sensitive habitat located downstream, including wetlands, associated with the San Elijo Lagoon. These 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.

Threshold BIO-4

Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

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 freeway. The location of the proposed solar field would not substantially interfere with the movement of any resident or migratory fish or wildlife species. The solar field is proposed in an area that is generally located to the east of the SEWRF on land comprised of disturbed habitat and non-native vegetation. Perimeter fencing currently exists around the SEWRF preventing wildlife from entering or leaving any native habitat

adjacent to the project area via the SEWRF. Therefore, the SEWRF, in its current condition, does not allow any mitigatory species to pass through the area.

The intersection improvements would occur in a developed area, in and near 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.

The potential impacts on wildlife movement as a result of the proposed solar field and frontage improvements are less than significant. Nevertheless, implementation of mitigation measures MM-BIO-1 and MM-BIO-2 from the Final MND would further reduce project effects to wildlife.

Threshold BIO-5

Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy ordinance?

The Revised Project would not conflict with any local policies or ordinances protecting biological resources. The Revised Project has been designed to maintain consistency with the City's wetland buffer policies. Wetlands exist off site and adjacent to the Manchester Avenue intersection improvements component of the Revised Project and the SEWRF driveway component of the Approved Project. By way of their adjacency, these components occur within the buffers for these off-site resources. However, as required, the improvements have been specifically designed to restrict all new development and disturbances to the existing disturbed and developed land associated with the Manchester Avenue right-of-way and SEWRF driveway, thereby avoiding any impact and preserving the biological integrity of the existing wetland buffers. As with the Approved Project, if avoidance measures and BMPs are not implemented during construction, potential significant indirect impacts could occur during construction to the off-site wetlands and undeveloped buffer areas. These 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.

Threshold BIO-6

Would the project conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or state HCP?

The Revised Project would not conflict with the provisions of such plans; no adopted plans apply to the Revised Project or SEJPA. The Revised Project does occur within the planning boundaries of the City's Draft Multiple Habitat Conservation Program (MHCP) Subarea Plan, which identifies a Hardline Focused Planning Area (FPA) occurring immediately west of the SEWRF. The Revised Project will have no impact on this draft FPA and would not conflict with the provisions or preclude the future adoption of the City's Draft MHCP Subarea Plan. The trail component of the Approved Project has been setback from the draft FPA area and has further received a CDP amendment from the California Coastal Commission to reconfigure the open space easement recorded over the slope within the FPA overlay in a superior manner. The amended easement configuration is biologically superior and would enhance the planned

FPA function in that it protects a more-contiguous habitat area. Further, mitigation measures MM-BIO-1, MM-BIO-2, MM-BIO-4, MM-BIO-5, and MM-BIO-7 would be implemented to ensure off-site biological resources of value, including those within the draft FPA overlay, are protected from indirect effects.

LEVEL OF SIGNIFICANCE AFTER MITIGATION

Implementation of mitigation measures MM-BIO-1 through MM-BIO-9 from the Final MND (Dudek 2016) would reduce potentially significant impacts of the Revised Project on biological resources to levels that are less than significant. As noted above, the Revised Project proposes to revise mitigation measures MM-BIO-1 and MM-BIO-3. No additional mitigation is required.

CONCLUSION

In conclusion, the findings of this assessment support the determination that no new 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 and associated biological resources technical report. With the implementation of mitigation measures MM-BIO-1 through MM-BIO-9 from the Final MND, potential significant impacts on biological resources resulting from the Revised Project would be reduced to a level of less than significant. As noted above, the Revised Project proposes to revise mitigation measures MM-BIO-1 and MM-BIO-3. No additional mitigation measures are required.

CLOSING

We appreciate the opportunity to provide you with this biological resources letter report. If you have any questions, please call me or Tim Belzman at (619) 462-1515.

Sincerely,


for

Amy Mattson
Biologist

Attachments:

Figure 1: Regional Location
Figure 2: USGS Topography
Figure 3: Aerial Photograph

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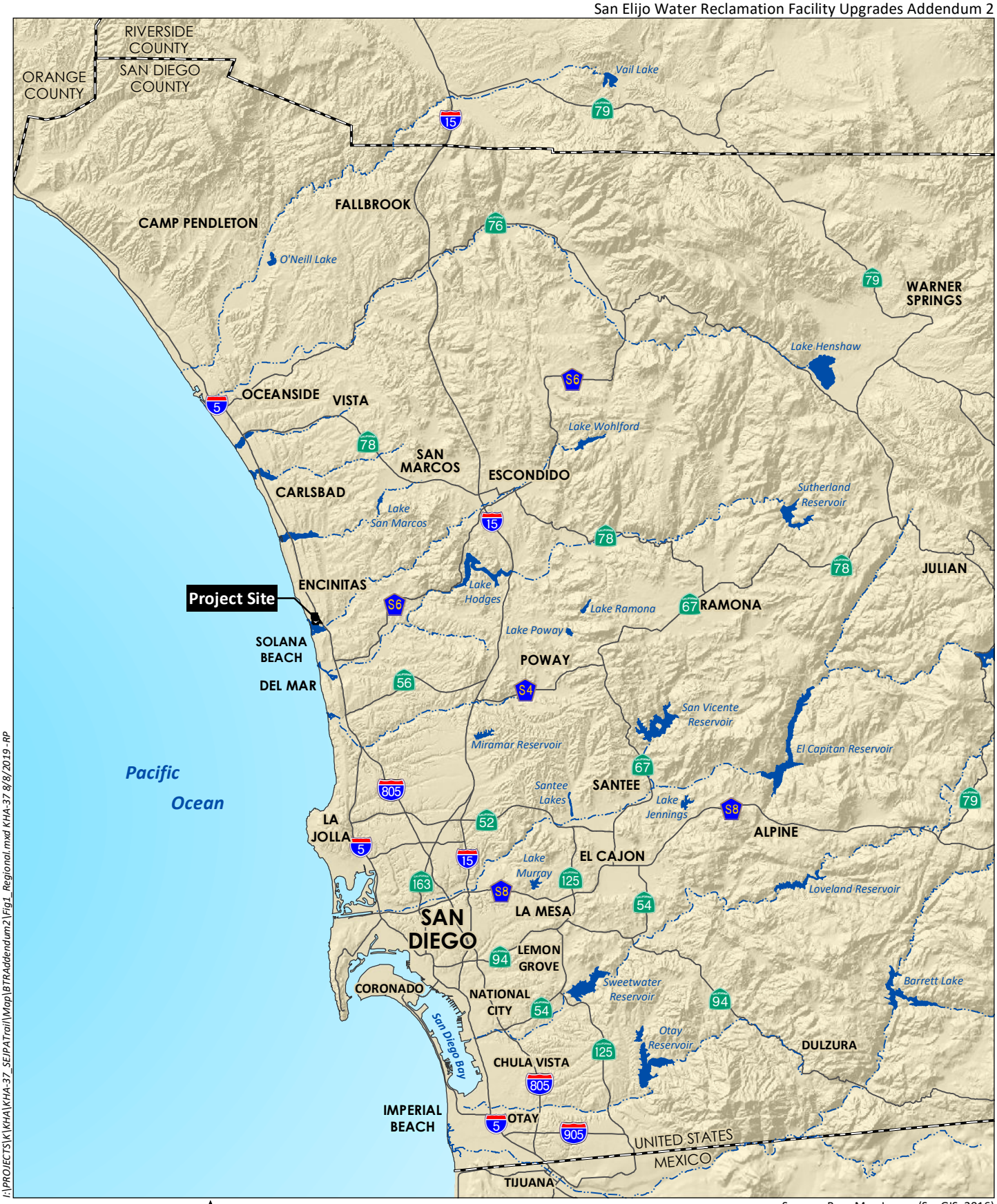

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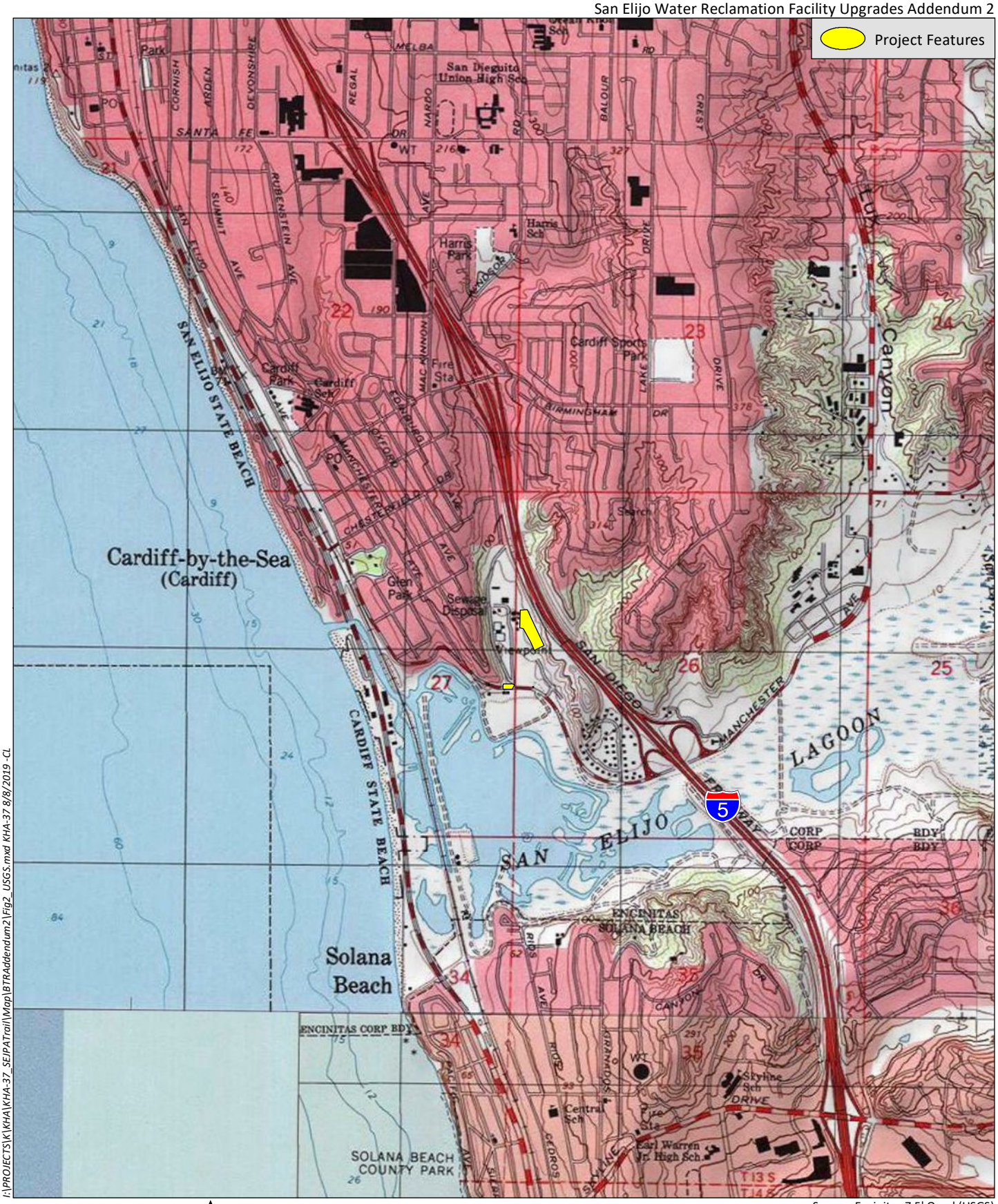
Source: Base Map Layers (SanGIS, 2016)

HELIX Environmental Planning

Regional Location

Figure 1



Source: Encinitas 7.5' Quad (USGS)

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HELIX Environmental Planning

USGS Topography

Figure 2

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Source: Aerial (SanGIS, 2017)

HELIX Environmental Planning

Aerial Photograph

Figure 3

Appendix C

Cultural Resources Technical Letter Report

HELIX Environmental Planning, Inc.
7578 El Cajon Boulevard
La Mesa, CA 91942
619.462.1515 tel
619.462.0552 fax
www.**helixepi**.com

August 14, 2019 KHA-37

Michael T. Thornton, P.E.
General Manager
San Elijo Joint Powers Authority
2695 Manchester Avenue
Cardiff-by-the-Sea, CA 92007-7077

Subject: Cultural Resources Technical Letter Report for the San Elijo Water Reclamation Facility Upgrades Project (Addendum 2), City of Encinitas

Dear Mr. Thornton:

HELIX Environmental Planning, Inc. (HELIX) was previously contracted to conduct a cultural resources study in support of an addendum (Addendum 1) to the Final Mitigated Negative Declaration (MND) for the San Elijo Joint Powers Authority's (SEJPA) San Elijo Water Reclamation Facility (SEWRF) Upgrades Project (Dudek 2016). The project analyzed in the Final MND included various upgrades, rehabilitations, and replacements for components of the SEWRF located in Cardiff-by-the-Sea in the City of Encinitas, California. HELIX prepared a cultural resources letter report (Wilson 2019) that addressed project modifications, including the proposed construction of a lighted shared-use trail and drainage improvements within the SEWRF property, and entrance improvements along the SEWRF frontage with Manchester Avenue. These modifications, as well as the other improvements originally proposed in the Final MND, are herein referred to as the Approved Project. This letter report details the methods and results of a cultural resources study performed for modifications to the Approved Project, including: (1) the proposed construction of a solar array field, and (2) redesign of SEWRF entrance improvements along Manchester Boulevard. The Approved Project with these proposed modifications is herein referred to as the Revised Project.

In summary, the locations for the proposed project modifications of the Revised Project lie in areas that have been surveyed and evaluated for cultural resources within the last five years (Falvey and Robbins-Wade 2015; Pham et al. 2016; Wilson 2019). As such, an analysis of the potential for impacts to cultural resources was accomplished without additional field survey based on the results of these recent previous studies.

PROJECT LOCATION AND DESCRIPTION

The SEWRF is generally located north of the San Elijo Lagoon, south of Birmingham Drive, east of the Pacific Ocean, and west of Interstate 5 (I-5) (Figure 1, *Regional Location*). The site is situated within Township 13 South, Range 4 West, Sections 26 and 27 on the Encinitas U.S. Geological Survey (USGS) topographic quadrangle map (Figure 2, *USGS Topography*).

The proposed modifications to the Approved Project would occur within and immediately adjacent to the SEWRF, located at 2965 Manchester Avenue in the City of Encinitas, within Assessor's Parcel Number (APN) 261-010-1302 (Figure 3, *Aerial Photograph*). Only those components that represent changes to the Approved Project are addressed in this study, which include construction of a ground-mounted solar array in the southeastern portion of the SEWRF property and a redesign of SEWRF frontage improvements with Manchester Avenue. The solar field would consist of ground-mounted solar photovoltaic panels within areas cleared of vegetation and adjacent to existing water treatment infrastructure. Proposed frontage improvements would include installation of a fully-actuated traffic signal; construction of new curb, gutter, Americans with Disabilities Act (ADA) curb ramps, sidewalks, and crosswalks; and installation of a biofiltration basin along the SEWRF frontage.

These proposed modifications would occur mostly within existing disturbed and developed portions of the SEWRF and its driveway intersection with Manchester Avenue, with additional areas located near the San Elijo Lagoon Visitor's Center driveway intersection with Manchester Avenue within the road right-of-way (Figure 3).

STUDY METHODS

The results from three recently conducted cultural resources surveys provided the principal basis for this analysis of the potential for impacts to cultural resources from the proposed modifications associated with the Revised Project. The first of these studies was performed by Dudek for the SEWRF Upgrades Project (Pham et al. 2016) in support of the Final MND (Dudek 2016). The second study (Wilson 2019) was recently performed by HELIX for the Approved Project to support Addendum 1 to the Final MND. The 2019 study included a field survey and testing of a shell deposit that was determined to likely pre-date human occupation. The third study was performed by HELIX in 2015 for the San Elijo Land Outfall Replacement Project (Falvey and Robbins-Wade 2015). This project involved the construction of outfall pipelines from the SEWRF into the San Elijo Lagoon. These pipelines extended from the SEWRF across the intersection with Manchester Avenue and the driveway into the San Elijo Lagoon Visitor's Center from Manchester Avenue. Given the recent dates of these previous surveys of the SEWRF, it was not necessary to conduct a field survey for the Revised Project as the footprints of the proposed modifications were covered in these previous surveys that have occurred with the last five years.

REGULATORY, ENVIRONMENTAL, AND CULTURAL SETTING

The regulatory, environmental, and cultural setting was outlined in the *Phase I Historical Resources Inventory Report for the San Elijo Water Reclamation Facility Upgrades Project*, conducted in 2016 (Pham et al. 2016). For a detailed discussion of regulations and applicable laws, and the cultural and environmental context for the Revised Project, please refer to that report.

STUDY RESULTS

The study performed by Dudek for the Final MND included an intensive pedestrian field survey of the entire area of the SEWRF (Pham et al. 2016). This survey included the area of the SEWRF proposed for the solar array field of the Revised Project. The results from the Dudek survey were negative for cultural resources in this area of the SEWRF (Pham et al. 2016). The Dudek study also included an evaluation of several existing standing structures within the SEWRF. None of these existing structures are present in the area currently proposed for the solar array field.

Contact with the Native American Heritage Commission (NAHC) for a Sacred Lands File (SLF) search and subsequent outreach letters sent to Native American representatives and interested parties identified by the NAHC resulted in no specific sacred site concerns related to SEWRF Upgrades Project area (Pham et al. 2016).

The area examined in the Dudek study did not include the area of the currently proposed upgrades within the SEWRF driveway and intersection with Manchester Avenue. However, the 2019 study performed by HELIX included field surveys of expanded areas resulting from the upgrades proposed in Addendum 1 that were beyond the SEWRF boundary surveyed by Dudek for the Final MND. These expanded areas included most of the area of proposed upgrades within the SEWRF driveway and intersection with Manchester Avenue, which included street-level enhanced trail crossing and traffic calming measures, and pedestrian-activated traffic control devices. The additional proposed intersection upgrades include the construction of a full traffic signal, curbs, and ADA ramps; slightly increasing the footprint in this area to the southwest.

In support of the Addendum 1 to the Final MND, the NAHC was contacted for a SLF search and subsequent outreach letters were sent to Native American representatives and interested parties identified by the NAHC (Wilson 2019). This outreach resulted in no specific sacred site concerns related to the revised project area.

The 2015 study performed by HELIX for the San Elijo Land Outfall Replacement Project (Falvey and Robbins-Wade 2015) involved the construction of outfall pipelines from the SEWRF into the San Elijo Lagoon, extending from the SEWRF across the intersection with Manchester Avenue and the driveway into the San Elijo Lagoon Nature Center from Manchester Avenue. This portion of the Outfall Replacement Project area coincides with the area of proposed intersection improvements of the Revised Project, covering the expanded area relating to the intersection upgrades. Contact with the NAHC for a SLF search and subsequent outreach letters sent to Native American representatives and interested parties identified by the NAHC for the 2015 HELIX study resulted in no specific sacred site concerns related to project area (Falvey and Robbins-Wade 2015).

One previously recorded prehistoric archaeological site, CA-SDI-6850, has been documented in the vicinity of the proposed upgrades within the intersection within Manchester Avenue and the driveway into the San Elijo Lagoon Visitor's Center. While not within the boundaries of the 2016 Dudek and 2019 HELIX studies, CA-SDI-6850 was recognized in the records searches conducted for those studies that encompassed the area surrounding the SEWRF Upgrades Project. Site CA-SDI-6850, however, did lie within the area of the 2015 HELIX study (Falvey and Robbins-Wade 2015). A field survey conducted as part of that study did not observe evidence for the presence of the site; however, visibility was poor due to pavement and dense vegetation obscuring the ground surface.

The findings in the 2015 HELIX study in regard to site CA-SDI-6850, in addition to the negative results of the 2015 field survey, incorporated the following results from a larger study recently conducted for the San Elijo Lagoon Restoration Project (Wahoff and Cooley 2014):

> The recorded location of this site [CA-SDI-6850], now containing the Nature Center facility, is situated along the northern lagoon margin, between the lagoon edge and Manchester Avenue. Site CA-SDI-6850 was originally recorded as a prehistoric resource consisting of a large shell midden with scattered artifacts, consisting of mostly debitage (Fink 1979b). When originally recorded, it was observed that the construction of Manchester Avenue had removed a substantial portion of the site. At that time, cultural material was observed in the road cuts along both sides of the street with a depth of 12 feet noted in the cut along the south side of the street. Subsequently, in 2007–2008, during archaeological monitoring of the construction of the Nature Center, a midden layer with a rock hearth feature was encountered at a depth of approximately 8 feet (Zepeda-Herman 2008).
>
> Currently, much of the site area is paved or otherwise developed. No cultural materials were observed. While it seems probable that the construction of the Nature Center destroyed much of what remained of site CA-SDI-6850, the possibility still exists that some buried remnants remain within any intact portions of the original landform [Wahoff and Cooley 2014:33].

Based on the results of the 2015 HELIX field survey and the 2014 Wahoff and Cooley study, HELIX recommended a program of cultural resources monitoring of the Outfall Pipeline construction through the site area (Falvey and Robbins-Wade 2015:13). This monitoring program was conducted by HELIX in 2018, and the results were negative.

RECOMMENDATIONS

As with the Approved 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 area. Although the potential impacts to cultural resources would not be increased by the Revised Project, unidentified remnants of site CA-SDI-6850 may still exist within the intersection of Manchester Boulevard and the driveways into the SEWRF and San Elijo Lagoon Nature Center, if any intact portions of the original landform are still present in the SEWRF Upgrades Project area.

Therefore, impacts to cultural and tribal cultural resources would remain potentially significant, and mitigation measure MM-CUL-1 described for the proposed project in the Final MND is also recommended for the Revised Project to reduce impacts to less than significant. No additional measures to avoid or minimize significant impacts to cultural and tribal cultural resources are warranted.

If you have any questions, please contact me at (619) 462-1515. Thank you.

Stacie Wilson, RPA
Senior Archaeologist

Attachments:

Figure 1: Regional Location
Figure 2: USGS Topography
Figure 3: Aerial Photograph

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Wilson, Stacie

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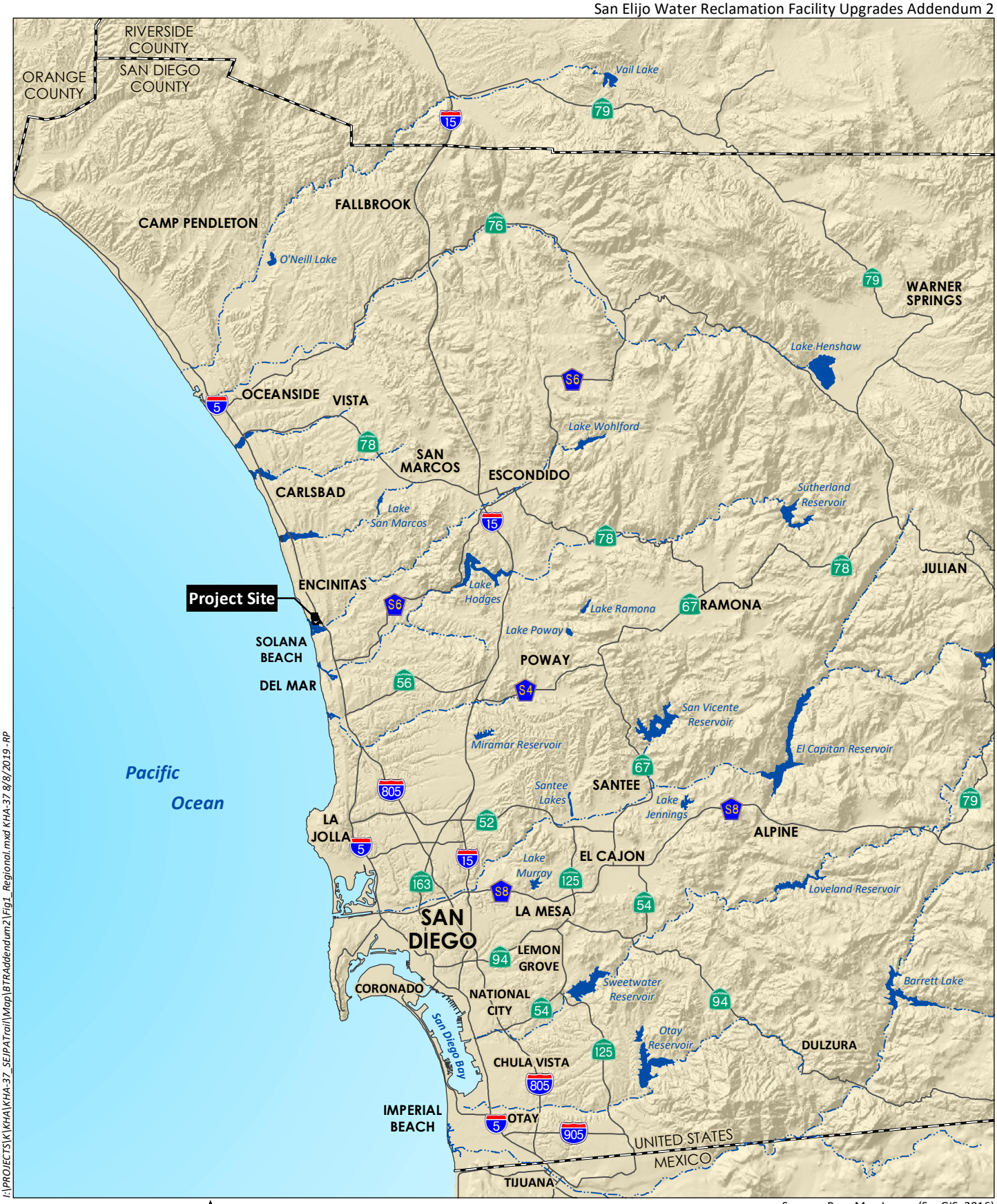

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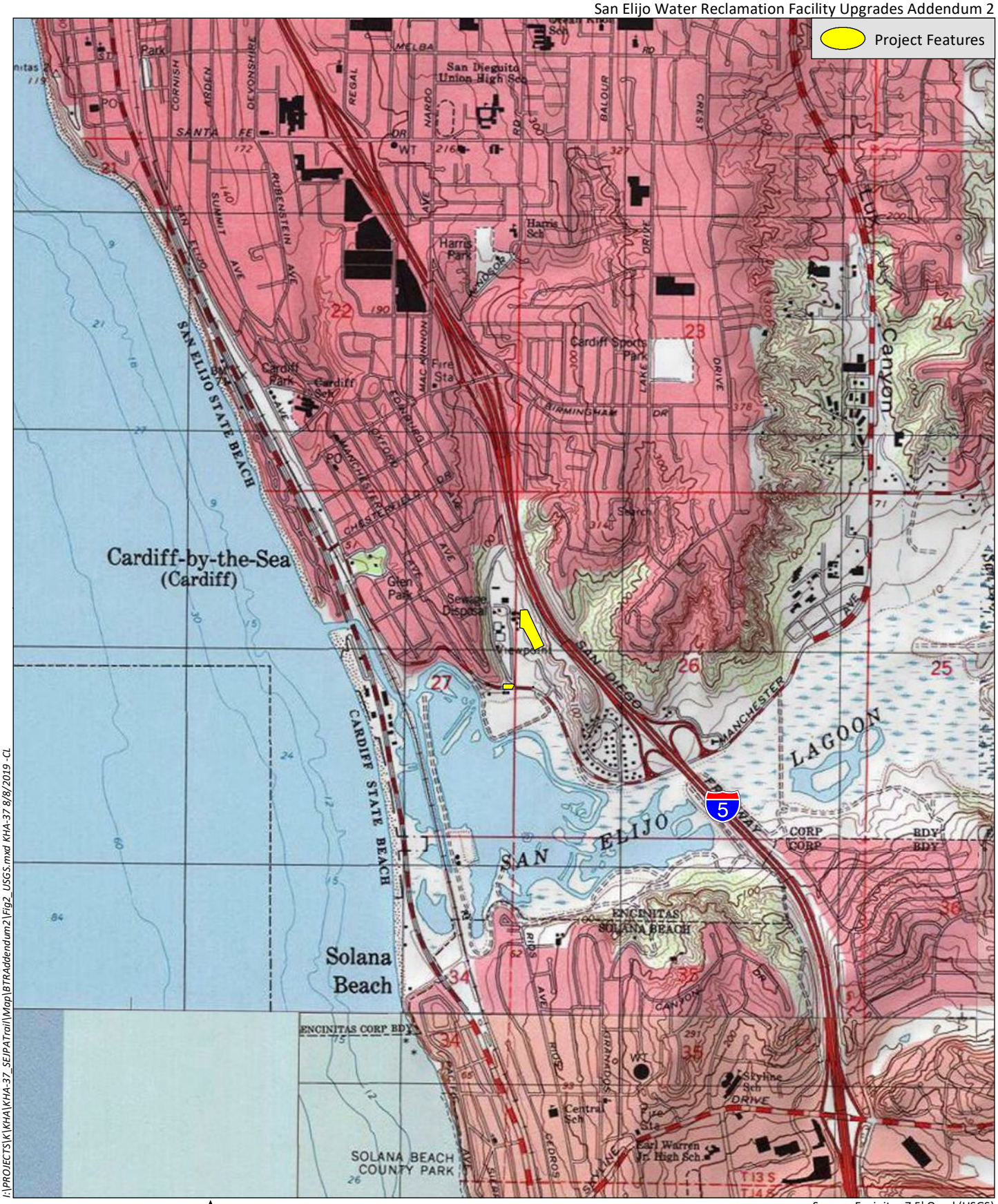
Source: Base Map Layers (SanGIS, 2016)

HELIX Environmental Planning

Regional Location

Figure 1



Source: Encinitas 7.5' Quad (USGS)

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HELIX Environmental Planning

USGS Topography

Figure 2

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0 200 Feet

Source: Aerial (SanGIS, 2017)

HELIX Environmental Planning

Aerial Photograph

Figure 3