



Planning Department
Environmental & Policy Analysis Division

**ADDENDUM No. 528126 to
PROGRAM ENVIRONMENTAL IMPACT REPORT
(EIR No. 42891/SCH No. 2004101032) for the
MASTER STORM WATER SYSTEM MAINTENANCE
PROGRAM**

SUBJECT: AMENDMENT TO THE MASTER STORM WATER SYSTEM MAINTENANCE PROGRAM. The proposed amendment to the Master Storm Water System Maintenance Program (MMP) is intended to incorporate two new storm water facilities and add two segments to an existing facility in the MMP, which was adopted in 2011 and revised in 2013. Subsequent to the adoption of the MMP, the City of San Diego's (City) Transportation & Storm Water Department (T&SWD) conducted emergency maintenance within the facilities proposed to be added to the MMP. In order to be covered by the Master Site Development Permit (SDP) issued for the MMP, the MMP is being amended to add these facilities.

The amendment also addresses technical corrections in three of the storm water facility maps included in the original MMP. The storm water facility depicted in Map 132 in Appendix B of the original MMP was a duplicate of the facility shown in Map 134. This has been corrected, and the facility depicted in Map 132 is now correct. Map 64 in Appendix B was inaccurately labeled Map 63, and is now properly labeled Map 64. Lastly, Map 52 was referred to as Camino del Arroyo. This street is not associated with Map 52. Map 52 is now named "Navajo Road" in Appendix A of the MMP to more appropriately represent the location of this channel.

Applicant: City of San Diego Transportation & Storm Water Department

I. PROJECT DESCRIPTION:

The proposed project consists of the addition of two new storm water facilities to the adopted MMP, the addition of two segments to a facility already included in the MMP, and technical corrections to three of the storm water facility maps included in MMP.

The current MMP governs the maintenance of a total of 113 individual storm water facilities within the jurisdiction of the T&SWD. Although the T&SWD conducted a comprehensive review to identify all of the storm water facilities within its jurisdiction that would need periodic maintenance, unanticipated emergency maintenance has been required within the new facilities which are the subject of this addendum.

New Facilities and Segments

Two new facilities (Maps 64a and 130a) would be added to the MMP. Two new segments would be added to Map 54 of the existing MMP. Table 1 identifies the characteristics of each facility and segment following the same format used in the Appendix A of the MMP.

The locations of the new facilities and segments are shown in Attachment 1 of the amended MMP. A brief description of each is provided below.

New Facilities

Reservoir Drive Channel (Map 64a)

Reservoir Drive Channel is located along the east side of Reservoir Drive, approximately 750 feet north of Alvarado Road. The location of the channel is shown on Map 64a of the amended MMP (Attachment 2). Emergency maintenance took place in this channel in November 2014 to ensure that an anticipated storm would not dislodge sediment and vegetation within this channel and block the downstream culvert in a similar situation to that which occurred in Map 54, as discussed below.

As indicated in Table 1, the Reservoir Drive Channel is a trapezoidal, concrete-lined channel that extends a distance of approximately 780 feet. The channel is 12 feet wide at the top with a bottom width of the channel at 4 feet.

4004 Via de la Bandola (Map 130a)

The 4004 Via de la Bandola channel is located between Via de la Bandola and Interstate 905. The location of the channel is shown on Map 130a of the amended MMP (Attachment 3). Emergency maintenance was required in November 2015 to remove vegetation and sediment that posed a flooding risk to adjacent property.

As indicated in Table 1, the 4004 Via de la Bandola channel is a trapezoidal, concrete-lined channel that extends a distance of approximately 650 feet. The channel is approximately 24 feet wide with a bottom width of approximately 6 feet.

**Table 1
STORM WATER FACILITIES TO BE ADDED TO MMP**

Map No.	Hydrologic Unit	Facility Description	Total Length (feet)	Facility Type (length in feet)		Coastal Zone?	Multiple Habitat Designation?	Estimated Disturbance Width ¹ (feet)
				Concrete Bottom	Earthen Bottom			
New Facilities								
64a	San Diego	Reservoir Drive Channel	780	780	--	N	N	12
130a	Tijuana	4004 Via de la Bandola	650	650	--	N	N	10
New Segments								
54	San Diego	San Carlos Creek	1,230 ²	1,230 ²	--	N	N	10-12 ²

¹ Disturbance width for channels wider than 20 feet (top of bank to top of bank) is assumed to be the width of the bottom of the channel plus two feet up each side slope. Disturbance width for channels less than 20 feet includes bottom and all of the side slopes.

² Includes new channel segments to be added to existing Map No. 54.

New Segments

San Carlos Creek (Map 54)

The San Carlos Map channel is generally located between Cowles Mountain Boulevard and Boulder Lake Avenue. The new segments are located upstream and downstream of the segment currently included in Map 54. The upstream segment is located north of the San Carlos Recreation Center and the downstream segment is located within the San Carlos Golf Course. Emergency maintenance occurred in November 2014 due to flooding caused by dislodged vegetation clogging a culvert beneath Cowles Mountain Boulevard. The resulting storm water back-up flooded property immediately upstream of the culvert. Vegetation was removed in the portion of the channel included in the MMP as well as upstream and downstream in order to avoid future clogs,

The downstream segment to be added extends to a point approximately 180 feet downstream of the Cowles Mountain Boulevard culvert. The downstream portion of San Carlos Creek to be added is characterized by a narrow, concrete-lined, trapezoidal channel with a top width of 10 feet and a bottom width of approximately 1 foot. The upstream portion extends approximately 1,050 feet easterly of Lake Badin Avenue, and is characterized by a trapezoidal, concrete-lined channel 33 feet wide with a bottom width of 8 feet. These additional areas are identified on Map 54 of the amended MMP (Attachment 4).

Technical Corrections

In the process of amending the MMP, technical corrections were made to the following maps within the original MMP.

Camino del Arroyo (Map 52)

The reference name for this channel in Appendix A of the MMP has been changed to Navajo Road to be more accurate in its location.

Alvarado Creek Channel (Map 64)

The map number assigned to this channel in Appendix B of the original MMP (#63) is incorrect. This map has been relabeled to "64" to accurately reflect Appendix A of the MMP. (Attachment 5)

Nestor Creek Channel (Map 132)

The technical correction in Map 132 in Appendix B of the original MMP is required to change the storm water facility depicted in Map 132 to the correct facility. The facility shown in Map 132 of the original MMP was a duplicate of the facility shown in Map 134. This technical correction has been made in Attachment 6.

II. ENVIRONMENTAL SETTING:

See Final Program Environmental Impact Report (PEIR) No. 42891/SCH No. 2004101032.

III. PROJECT BACKGROUND:

Discussion

The primary purpose of the MMP is to guide maintenance activities within the storm water facilities maintained by the T&SWD. The City adopted the MMP in 2011 and revised the plan in 2013. The MMP includes a series of maintenance protocols designed to minimize adverse effects of storm water facility maintenance on biological, historical and water resources. The City prepared and certified PEIR No. 42891 to evaluate the potential environmental impacts of implementing the MMP and to identify appropriate mitigation measures to reduce or avoid impacts. The MMP also incorporates the applicable mitigation measures identified in the Mitigation Monitoring and Report Program (MMRP) associated with the PEIR prepared for the adopted MMP.

The MMP includes a Substantial Conformance Review (SCR) process to ensure that the maintenance protocols and MMRP mitigation measures are implemented during maintenance activities. The SCR process involves a series of individual assessments designed to minimize the amount of maintenance required within storm water facilities and, in turn, reduce impacts related to hydrology, biological resources, historical resources, water quality and noise. Initially, a hydrological assessment is prepared to determine the minimum amount of maintenance needed to maximize the flood water conveyance capacity of individual storm water facilities. Once the appropriate amount of maintenance is determined, the potential impacts of the maintenance are evaluated in a series of individual assessments addressing biological resources, historical resources, water quality and noise. These assessments determine the maintenance protocols and MMRP mitigation measures that must be implemented for each maintenance activity to minimize environmental impacts.

IV. ENVIRONMENTAL ANALYSIS

The PEIR concluded that implementation of the MMP would result in significant direct and/or cumulative impacts with respect to the following issues.

- Aesthetics/Neighborhood Character (Cumulative)
- Air Quality (Cumulative)
- Biological Resources (Direct and Cumulative)
- Greenhouse Gas (GHG) Emissions (Cumulative)
- Historical Resources (Direct and Cumulative)
- Land Use (Direct)
- Paleontological Resources (Direct and Cumulative)
- Solid Waste Disposal (Cumulative)
- Water Quality (Direct and Cumulative)

As discussed below and illustrated in Table 2, maintenance of the additional storm water facilities and segments, and the technical corrections to Maps 52, 64 and 132 would not change the results and conclusions of the PEIR. The addition of the new facilities or segments would not result in new significant impacts nor would it substantially increase the severity of the significant impacts identified in the PEIR.

Subsequent to the City's adoption of the MMP in 2011, the timeframe of the Master Site Development Permit and Master Coastal Development Permit, upon which maintenance under the MMP depends, was reduced from 20 to 5 years. As a result, the maximum impacts of maintenance assumed in the PEIR will be much less than assumed due to the restricted amount of time during which maintenance can occur. Under normal conditions, the City is able to maintain approximately three to six facilities a year. Additionally, several of the facilities maintained in any given year will be a continuation of maintenance initiated in previous years. Over five years, it is anticipated that 15-30 facilities will be maintained through the MMP, which is only a fraction of the 113 facilities included in the MMP. Therefore, the impacts of the amended MMP will be within the total impacted acreage anticipated in the PEIR, and the addition of the new facilities and segments to the MMP is considered a minor change to the project.

The technical corrections to Maps 52, 64 and 132 in the MMP do not affect the analysis and conclusions contained in the PEIR because the correct facility was originally analyzed but depicted incorrectly in one portion of the document.

**Table 2
COMPARISON OF SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE
PROPOSED PROJECT WITH THE AMENDED MMP¹**

Environmental Subject	Impact	Adopted MMP (Direct/Cumulative Impact)	Amended MMP (Direct/Cumulative Impact)	Change?
Aesthetics/ Neighborhood Character	Removal of vegetation, including mature trees along natural drainage courses, would diminish aesthetic/neighborhood character.	NS/SNM	NS/SNM	No
Air Quality	Criteria pollutants released by equipment associated with maintenance would contribute to air pollution already occurring with the San Diego Air Basin (SDAB).	NS/SNM	NS/SNM	No
Biological Resources	Loss of significant vegetation communities consisting of up to 41.62 acres of wetland vegetation ranging from mature southern willow scrub to freshwater marsh; 37.08 acres of unvegetated channel bottom; and 4.9 acres of sensitive upland vegetation communities including Diegan coastal sage scrub, southern mixed chaparral and non-native grassland.	SM/SNM	SM/SNM	No
	Loss of habitat for sensitive birds including the coastal California gnatcatchers, least Bell's vireo, or raptors.	SM/SNM	SM/SNM	No
	Loss of habitat for sensitive fish.	SM/SNM	SM/SNM	No
	Loss of sensitive plant species with potential to occur.	SM/SNM	SM/SNM	No
	Loss of vegetation could increase downstream urban pollutants due to the loss of natural removal through root systems of in-channel vegetation.	SM/SNM	SM/SNM	No
	Disruption of breeding activities of sensitive birds including the coastal California gnatcatchers, least Bell's vireo, or raptors.	SM/SNM	SM/SNM	No
Greenhouse Gas	GHG emissions released by equipment in the course of maintenance would combine with GHG emission from other sources in the SDAB.	NS/SNM	NS/SNM	No
Historical Resources	Potential loss of unknown historical resources and previously identified historical resources.	SM/SNM	SM/SNM	No

Table 2 (cont.) COMPARISON OF SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE PROPOSED PROJECT WITH THE AMENDED MMP¹				
Environmental Subject	Impact	Adopted MMP (Direct/Cumulative Impact)	Amended MMP (Direct/Cumulative Impact)	Change?
Land Use	Impacts to Multiple Species Conservation Program (MSCP-) protected species	SM/NS	SM/NS	No
	Potential loss of significant unknown historical resources and previously identified historical resources.	SM/NS	SM/NS	No
Paleontological Resources	Potential impacts to fossil-bearing geologic formations through constructing new or reconstructing existing access roads.	SM/SNM	SM/SNM	No
Solid Waste	Diminished landfill capacity resulting from disposal of dredge spoil, vegetation and rubbish produced by maintenance activities.	NS/SNM	NS/SNM	No
Water Quality	Diminished water quality resulting from increased erosion or discharge of contaminants during maintenance	SM/SNM	SM/SNM	No

¹ Based on Table ES-1 of the PEIR.

NS: Not significant

SM: Significant but mitigated

SNM: Significant and not mitigated

Aesthetic/Neighborhood Character

The PEIR concluded that the removal of riparian vegetation and mature trees associated with the storm water facilities to be maintained in accordance with the MMP would not result in a significant, direct impact on aesthetics and neighborhood character. However, the cumulative impact of the removal of riparian vegetation and mature trees city-wide was determined to be significant and unavoidable. In light of the fact that the majority, if not all, of the mature vegetation within a storm water facility must be removed to maximize flood water conveyance, no mitigation measures exist to compensate for the removal of vegetation within the channel. Thus, the significant cumulative impact was found to be unavoidable.

The new facilities and segments to be added to the MMP do not possess any intrinsic aesthetic value. The channels are located within highly urbanized areas and all are concrete-lined. Furthermore, biological surveys conducted for this Addendum determined that the facilities did not support extensive areas of wetland habitat or mature trees. As a result, maintenance of these channels would not have a significant, direct impact on local aesthetics or neighborhood character. Although maintenance of the proposed new facilities and segments would not result in the loss of substantial riparian vegetation or mature trees, the

maintenance would incrementally contribute to the significant cumulative impact identified in PEIR.

In summary, the addition of the new facilities and segments would not change the results and conclusions of the PEIR relative to aesthetics/neighborhood character. Direct impacts on aesthetics and neighborhood character would continue to be not significant. Cumulative impacts would continue to be significant and unavoidable.

Air Quality

The PEIR concluded that, on an individual basis, criteria air pollutants generated by mechanical equipment used in the maintenance of storm water facilities would not result in significant, direct impacts on air quality. The Findings associated with the PEIR concluded that the MMP's impact on criteria pollutants would be cumulatively significant and unavoidable.

As with maintenance activities of storm water facilities included in the adopted MMP, maintenance equipment used to maintain the proposed facilities would generate criteria air pollutants. As concluded in the PEIR, the criteria air pollutants generated by maintenance in the proposed facilities would not have a significant, direct impact on air quality. However, the additional criteria pollutants would contribute to the cumulative impacts on air quality identified in the PEIR.

In summary, the addition of the new storm water facilities and segments to the MMP would not change the results and conclusions of the PEIR relative to air quality. Direct impacts on air quality would continue to be not significant. Cumulative impacts would continue to be significant and unavoidable.

Biological Resources

The PEIR concluded that maintenance activities associated with the MMP would result in significant direct and cumulative impacts with respect to sensitive habitat, sensitive plants, and sensitive animals. The primary direct impact on sensitive habitat is associated with wetlands. The PEIR estimated that maintenance of the storm water facilities included in the adopted MMP could impact up to 41.6 acres of wetlands (Table ES-1), over the 20-year life of the MMP. Impacted wetland communities included southern riparian forest, southern sycamore riparian woodland, southern willow scrub, mule fat scrub, riparian scrub, freshwater marsh, cismontane alkali marsh, southern coastal saltmarsh, coastal brackish marsh, and disturbed wetland. In addition, the PEIR estimated that up to 4.9 acres of sensitive upland vegetation communities, over the 20-year life of the MMP, could be impacted including Diegan coastal sage scrub, southern mixed chaparral, and non-native grassland (Table ES-1).

A number of sensitive animal species are expected to occur within the areas to be maintained pursuant to the MMP. Surveys conducted for the PEIR observed the following four sensitive animals: least Bell's vireo, northern harrier, yellow warbler and little blue heron. Although not detected during the biological surveys, light-footed clapper rail, southwestern willow flycatcher, yellow-breasted chat, and San Diego fairy shrimp also have been documented in

or near portions of the study area. Direct impacts to sensitive animals were associated with loss of habitat. Indirect impacts on sensitive birds were associated with the disruption of breeding by maintenance equipment noise.

Potentially affected sensitive plants included single-whorl burrobush, San Diego marsh-elder, southwestern spiny rush, and San Diego sunflower.

The PEIR also concluded that the loss of vegetation within drainages could reduce the ability of storm water facilities to naturally remove pollutants associated with storm water. Increases in water-borne pollutants were found to have a potentially significant impact on wildlife within downstream habitat.

The PEIR identified an extensive range of mitigation measures designed to reduce the impact of maintenance on sensitive habitat, plants and animals. The primary form of mitigation is creation, enhancement and/or restoration of habitats to provide direct compensation for sensitive habitats and plants impacted by storm water facility maintenance. Mitigation measures are included to limit maintenance during the typical breeding season, including the implementation of noise attenuation measures and setbacks to minimize the indirect impacts of maintenance on sensitive animals. Water quality control measures are included to protect downstream wildlife and habitat from the temporary loss of natural treatment related to removal of vegetation during maintenance.

The PEIR concluded that implementation of the mitigation measures included in the document would be sufficient to reduce the direct impact of storm water maintenance to sensitive habitat, plants and animals to be a level less than significant. However, the PEIR concluded that the impacts of maintenance in combination with other development within the City would result in a significant cumulative impact that would not be mitigated.

In order to estimate the additional biological resource impacts associated with adding the new facilities and segments, new biological surveys were conducted or previous surveys consulted. The results of this research are summarized in a memorandum prepared by HELIX Environmental Planning, Inc. (HELIX) dated November 16, 2016. Based on the evaluation of the new facilities and segments, the impacts to vegetated wetlands (0.28 acre) would represent an increase of less than one percent above the 41.6 acres of wetlands assumed to be impacted by the PEIR. Impacts to upland vegetation related to the new facilities and segments is estimated at 0.46 acre; representing a 9 percent increase over the 4.9 acres associated with the adopted MMP.

Because the time frame of the MMP was reduced from 20 years to five years after certification of the PEIR, the total acreage to be impacted by the MMP, even with the additional facilities and segments, would be less than the 41.6 acres of wetlands and 4.9 acres of uplands anticipated under a 20-year program (Table ES-1 of PEIR).

As with the PEIR, the potential impact of maintenance was based on the assumption that maintenance would encompass no more than the channel bottom and two feet up each bank for channels with an overall width of more than 20 feet and the entire channel where the width is less than 20 feet.

In addition to minimal impacts to sensitive habitats, maintenance of the new facilities and segments would result in minimal impacts to sensitive plants because the facilities and segments are concrete-lined, and do not support extensive areas of sensitive habitat. Due to the lack of sensitive habitat and their location within highly urbanized areas, the proposed facilities are not expected to support sensitive birds. Sensitive fish species are not expected to occur due to the ephemeral nature of runoff within the facilities. Lastly, none of the new facilities or segments are located within or adjacent to a Multi-Habitat Planning Area (MHPA).

Based on the minimal amount of native habitat associated with the new facilities and segments, potential effects of the maintenance on water quality would be nominal.

In summary, the addition of the proposed facilities and segments to the MMP would not change the results and conclusions of the PEIR relative to biological resources. Significant, but mitigated, direct impacts would continue to occur with respect to sensitive habitat, plants and animals. Cumulative impacts on these resources would continue to be significant and unavoidable.

Greenhouse Gas Emissions

The PEIR concluded that, on an individual basis, GHG generated by maintenance of storm water facilities would not result in significant, direct impacts. However, the cumulative effect of GHG generated by storm water maintenance was determined to represent a significant, unmitigated cumulative impact.

As with maintenance activities of storm water facilities included in the adopted MMP, maintenance equipment used to maintain the proposed facilities would generate GHG emissions. The GHG emissions generated by maintenance of the proposed facilities would not result in a significant, direct impact. However, the GHG emissions associated with maintenance of the new facilities would contribute to the significant cumulative GHG impact identified in the PEIR. As with air quality impacts, mitigation of the underlying climate change problems associated with GHG emissions was determined to be unavoidable.

In summary, the addition of the new storm water facilities and segments would not change the results and conclusions of the PEIR relative to GHG emissions and climate change. Direct impacts would continue to be not significant. Cumulative impacts would continue to be significant and unavoidable.

Historical Resources

The PEIR concluded that maintenance could result in impacts to historical resources located along or within natural drainage courses. Based on research conducted for the PEIR, a number of the storm water facilities are located within areas that have a moderate to high potential for significant historical resources located on and/or below the surface. Although mitigation measures in the form of maintenance monitoring and recovery of significant historical resources would reduce direct impacts to historical resources to below a level of

significance, the PEIR concluded that the cumulative impact to historical resources would be cumulatively significant and unavoidable.

The potential for significant resources to be associated with the new facilities and segments is low because the facilities are concrete-lined. In addition, access and staging for maintenance is expected to occur on paved areas or on land that has already been disturbed by adjacent development. Furthermore, staging and access would not result in excavation that could encounter buried historical resources. A more detailed site-specific analysis would be completed as part of an Individual Historical Assessment (IHA).

In summary, the addition of the new storm water facilities and segments would not change the results and conclusions of the PEIR relative to historical resources. Direct impacts would continue to be mitigated to below a level of significance through implementation of mitigation measures included in the MMRP. Cumulative impacts would continue to be significant and unavoidable.

Land Use

The PEIR concluded that the direct impact of maintenance on biological and historical resources would be significant with respect to land use due to the City's land use regulations and policies intended to protect these resources. Cumulative impacts were determined to be not significant.

The PEIR concluded that maintenance would conflict with goals and policies established by the City's Environmentally Sensitive Land (ESL) Regulations and the City's Subarea Plan of the MSCP. Impacts of maintenance equipment noise during the breeding season could impact sensitive birds, which would conflict with the land use policies and goals directed toward protecting sensitive bird species, including the coastal California gnatcatcher, least Bell's vireo, and raptors. The PEIR concludes that implementation of the mitigation measures included in the MMRP to protect sensitive habitat, animals and plants would reduce potential impacts on habitat or species protected by the MSCP or ESL to below a level of significance.

In addition to potentially significant impacts on biological resources protected by the City's biological resource protection policies, maintenance could also have a significant direct land use impact on historical resources that are protected by the Historical Resource Element of the City's General Plan. As with biological resources, the PEIR concludes that implementation of mitigation measures identified in the MMRP would reduce potential conflicts with the policies and regulations intended to protect historical resources to below a level of significance.

The addition of the new storm water facilities and segments would not substantially increase the potential impacts of the MMP on species protected by the MSCP. Based on the baseline biological resource surveys of the proposed facilities, none of the facilities or segments are expected to support sensitive habitat or species protected by the MSCP or ESL. In addition, none of the proposed facilities or segments are located within a Multi-Habitat Plan Area (MHPA) designation, as identified by the MSCP Subarea Plan. Thus, the addition of the

proposed facilities and segments would not increase the severity of the potential direct impact identified in the PEIR.

Similarly, the inclusion of the proposed facilities and segments in the MMP would not increase the severity of the impacts of maintenance on the City's policies and regulations protecting significant historical resources because the facilities are concrete-lined.

In summary, the addition of the new storm water facilities and segments would not change the results and conclusions of the PEIR relative to the City's land use policies and regulations intended to protect significant biological and historical resources. Direct impacts would continue to be mitigated to below a level of significance through implementation of mitigation measures identified in the MMRP.

Paleontological Resources

The PEIR concluded that maintenance activities could encroach into geologic formations that exhibit a moderate to high potential for significant fossil deposits. This potential impact was determined to represent a significant direct and cumulative impact. Implementation of the mitigation measures identified in the MMRP was determined to be sufficient to reduce direct impacts to below a level of significance. However, cumulative impacts were determined to be significant and unavoidable.

Maintenance within the proposed facilities and segments would not encroach into the geologic formations which underlie those channels because they are concrete-lined. Thus, inclusion of the new facilities and segments in the MMP would not increase the severity of potential impacts of maintenance to paleontological resources.

In summary, the addition of the new storm water facilities and segments would not change the results and conclusions of the PEIR relative to paleontological resources. Direct impacts would continue to be mitigated to below a level of significance through implementation of mitigation measures identified in the MMRP. Cumulative impacts would continue to be significant and unavoidable.

Solid Waste Disposal

The PEIR concluded that the majority of the vegetation and a portion of the sediment removed in the course of maintenance would be taken to local landfills for disposal. Combined with the demand created for landfill space associated with future development in the metropolitan area, the proposed maintenance activities were determined to have a significant cumulative impact with respect to solid waste disposal. Maintenance protocols are included in the MMRP that would encourage recycling of vegetation, but some of the vegetation (most notably *Arundo*) is too fibrous for recycling, in which case, landfill disposal would be required. Thus, the project impacts with respect to solid waste disposal were considered cumulatively significant and unavoidable.

Maintenance of the facilities proposed to be added to the MMP would generate vegetation and sediment that would require disposal. Because the timeframe for the MMP was reduced

from 20 years to five years after the PEIR was certified, the total amount of waste generated is anticipated to be below the total levels analyzed in the PEIR, even with the addition of the new facilities and segments. Although the contribution would be minimal, inclusion of the proposed facilities and segments would contribute to the cumulatively significant impact of storm water facility maintenance on solid waste disposal identified in the PEIR. Thus, the conclusion that the significant cumulative impact would be unavoidable would continue to apply.

In summary, the addition of the new storm water facilities and segments would not change the results and conclusions of the PEIR relative to solid waste disposal. Cumulative impacts would continue to be significant and unavoidable.

Water Quality

The PEIR concluded that storm water facility maintenance would have both positive and negative impacts on water quality. Negative impacts on water quality would be associated with erosion and sedimentation during and following excavation activities, diminished pollutant removal capacity, introduction of hazardous materials related to the operation of mechanized equipment use (e.g., fuels, etc.), trash generation related to maintenance operations/crews, and the dewatering of dredged material. Positive effects included removal of polluted sediment and plant material during maintenance. The net effect of maintenance on water quality was determined to be dependent on whether the loss of pollutant treatment capacity with an individual maintenance activity would be outweighed by the reduction in pollutants that would occur from excavation of polluted sediment and plant material. Implementation of the mitigation measures identified in the MMRP was determined to be sufficient to reduce direct impacts to below a level of significance. However, cumulative impacts were determined to be significant and unavoidable.

Removal of sediment and vegetation during maintenance of the proposed facilities and segments would not increase the water quality impacts identified in the PEIR. As concrete-lined channels, the potential for erosion following the removal of vegetation and sediment would be minimal.

Thus, the conclusion of the PEIR that maintenance would have significant, unmitigated cumulative impacts with respect to water quality would not change with the inclusion of the new facilities and segments in the MMP. Potential cumulative impacts to water quality would remain significant and unavoidable

V. DETERMINATION:

Based on the information presented in Section IV of this Addendum and in accordance with Section 15162(a) of the California Environmental Quality Act (CEQA) Guidelines, as discussed below, the City concludes that none of the conditions requiring the preparation of a Subsequent EIR would occur with the inclusion of the additional storm water facilities and segments into the MMP. Thus, the results and conclusion of the PEIR along with the approved MMRP would apply to the proposed Amended MMP.

CEQA Guidelines Section 15164(a) states that *“The Lead Agency shall prepare an addendum to a previously certified EIR if some changes or additions are necessary but none of the conditions described in Section 15162 calling for preparation of a subsequent EIR have occurred.”*

Discussion: As discussed below, none of the conditions described in Section 15162 apply to the proposed amendment to the MMP. Thus, this Addendum is the appropriate means to satisfy the requirements of CEQA for the proposed amendment to the MMP.

CEQA Guidelines, Section 15162(a) states *When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:*

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.*

Discussion: No substantial changes to the MMP would occur with the addition of the new storm water facilities and segments. The new storm water facilities and segments, and the maintenance required to promote flood water conveyance are comparable to the other facilities already included in the MMP. Furthermore, as discussed in Section IV, the addition of the new storm water facilities and segments to the MMP would not result in any significant impacts not already identified in the PEIR, nor would the new facilities or segments increase the severity of the significant impacts that are identified in the PEIR. Given the facilities are located in highly urbanized areas and are concrete-lined, no substantial impacts to biological, historical or water quality resources are anticipated. Similarly, impacts related to the other significant impacts (aesthetics/neighborhood character, air quality, GHG, land use, paleontology, and solid waste) would be nominal. Lastly, the technical corrections to Maps 52, 64 and 132 would not constitute a substantial change in the project because the correct facilities associated with these maps were analyzed in the PEIR.

- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects.*

Discussion: No substantial changes in the circumstances under which the original MMP was prepared have occurred. Local, state and federal regulations governing storm water facilities and the associated environmental resources have not changed. In particular, the regulations related to wetlands (e.g. ESL, California Fish and Game Code, and the federal Clean Water Act) have not changed. No new animals or plants associated with storm water facilities have been listed as threatened or endangered by either California or the federal government.

- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was adopted, shows any of the following:*

- A. *The project will have one or more significant effects not discussed in the previous EIR or negative declaration;*

Discussion: As discussed in Section IV, inclusion of the new storm water facilities and segments in the MMP would not result in significant impacts not already identified in the PEIR. Similarly, the technical corrections to Maps 52, 64 and 132 would not constitute a substantial change in the project because the correct facilities associated with these maps were analyzed in the PEIR.

- B. *Significant effects previously examined will be substantially more severe than shown in the previous EIR;*

Discussion: As discussed in Section IV, the severity of significant impacts identified in the PEIR would not increase with the inclusion of the additional storm water facilities and segments in the MMP. Similarly, the technical corrections to Maps 52, 64 and 132 would not constitute a substantial change in the project because the correct facilities associated with these maps were analyzed in the PEIR.

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

Discussion: No mitigation measures or alternatives considered infeasible in the Findings prepared for the PEIR are now considered feasible. No new mitigation or alternatives not considered in the PEIR have been identified.

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

Discussion: No mitigation measures or alternatives that are considerably different than analyzed in the PEIR have been identified.

V. MITIGATION, MONITORING AND REPORTING PROGRAM INCORPORATED INTO THE PROJECT:

No mitigation measures beyond those included in the MMRP adopted when the PEIR was certified are required with the proposal to include the additional facilities and segments in the MMP. Thus, the current MMRP would continue to apply to the storm water facilities maintained under the amended MMP.

VI. SIGNIFICANT UNMITIGATED IMPACTS:

As indicated in Section IV, there are no new significant impacts associated with the proposed amendment to the MMP, and significant effects previously examined will not be

substantially more severe than what was identified in the previous PEIR. The following environmental impacts identified in the PEIR would remain significant and unavoidable:

- Aesthetics/Neighborhood Character (Cumulative)
- Air Quality (Cumulative)
- Biological Resources (Direct and Cumulative)
- GHG Emissions (Cumulative)
- Historical Resources (Direct and Cumulative)
- Paleontological Resources (Direct and Cumulative)
- Solid Waste Disposal (Cumulative)
- Water Quality (Direct and Cumulative)

Because there were significant, unmitigated impacts associated with the original MMP, the City Council adopted findings, pursuant to CEQA Section 15091. These findings concluded that: a) specific economic, social or other considerations make infeasible some of the mitigation measures or project alternatives as identified in the final PEIR, and b) these impacts have been found acceptable for reasons contained in a Statement of Overriding Considerations (SOC) adopted pursuant to CEQA Section 15093. No new CEQA Findings or SOC are required for the amended MMP.

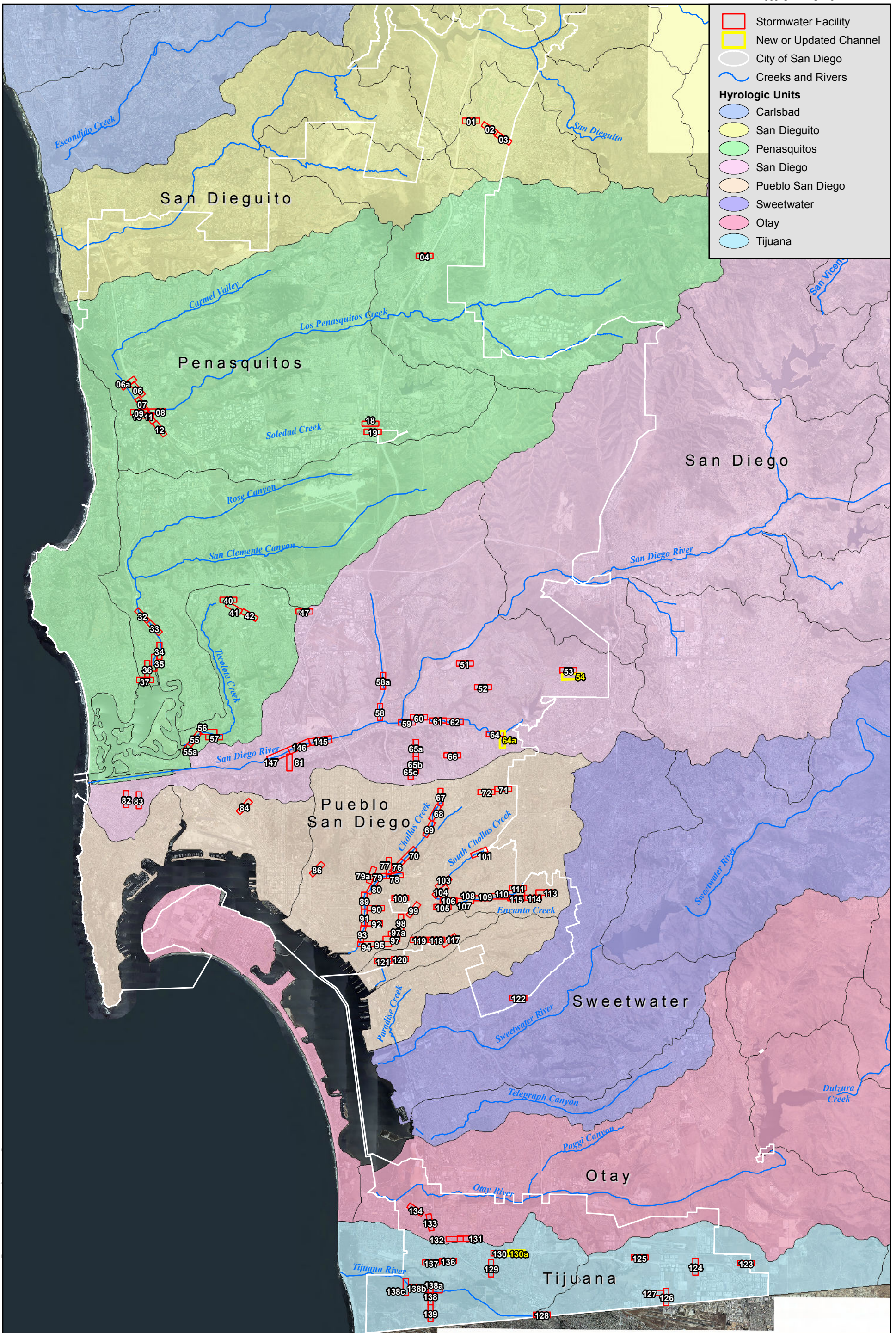
VII. PUBLIC REVIEW DISTRIBUTION:

No public review of this Addendum was required. Section 128.0306 of the San Diego Municipal Code (SDMC) requires public review of environmental documents to follow the procedures established by the California Environmental Quality Act (CEQA) Guidelines. Section 15164(c) of the CEQA Guideline states “An addendum need not be circulated for public review but can be included in or attached to the final EIR or adopted negative declaration prior to making a decision on the project.” In accordance with this requirement, this addendum has been attached to the Final PEIR prepared for the MMP.



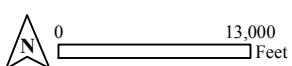
Myra Herrmann, Senior Planner

August 4, 2017
Date of Final Report



Major Stormwater Facility Locations

CITY OF SAN DIEGO MASTER STORMWATER SYSTEM MAINTENANCE PROGRAM

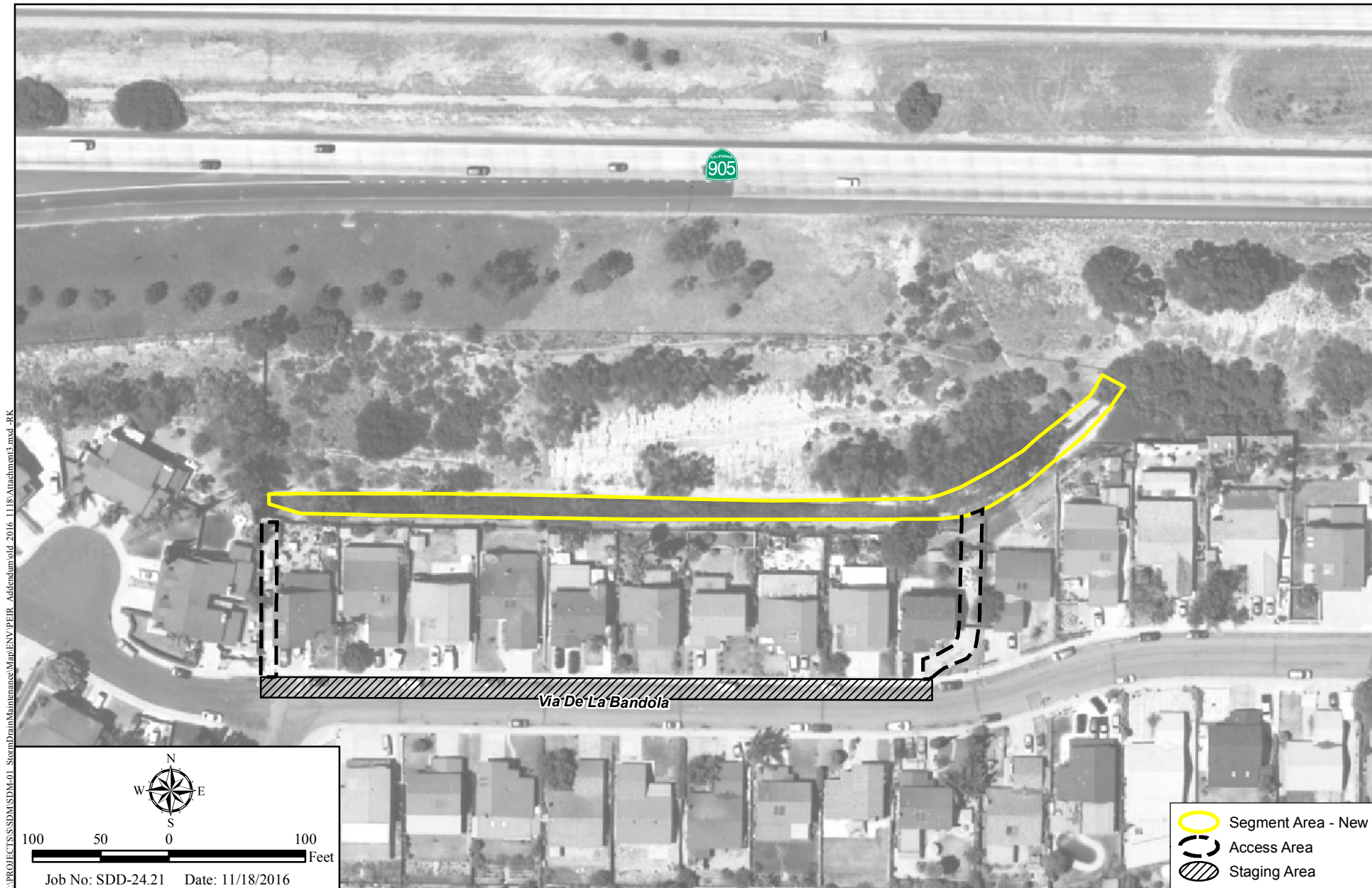


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Access and Staging Areas - Map 64a

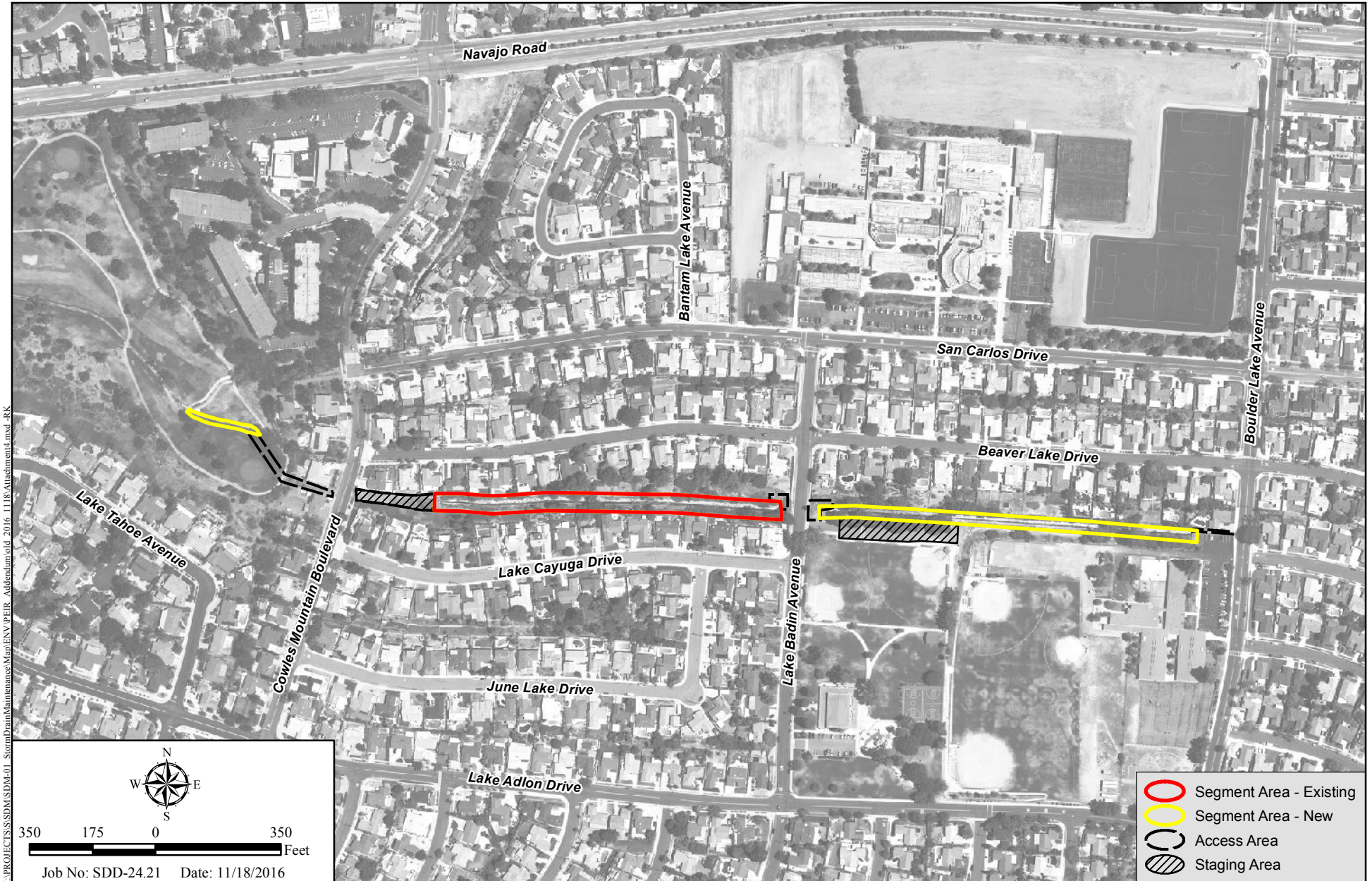
CITY OF SAN DIEGO MASTER STORMWATER SYSTEM MAINTENANCE PROGRAM



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Access and Staging Areas - Map 130a

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Access and Staging Areas - Map 54

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Access and Staging Areas - Map 64

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Access and Staging Areas - Map 132

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