

# **APPENDIX A**

*Scoping Letter, NOP, and NOP Comments*





THE CITY OF SAN DIEGO

**PLANNING DEPARTMENT**

Date of Notice: November 24, 2014

**PUBLIC NOTICE**

**OF THE PREPARATION OF A PROGRAM ENVIRONMENTAL IMPACT REPORT**

**AND**

**A SCOPING MEETING**

INTERNAL ORDER No. 21003411

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**PUBLIC NOTICE:** The City of San Diego as the Lead Agency has determined that the project described below will require the preparation of a Program Environmental Impact Report (PEIR) in compliance with the California Environmental Quality Act (CEQA). This Notice of Preparation of a PEIR and Scoping Meeting was publicly noticed and distributed on November 24, 2014. This notice was published in the SAN DIEGO DAILY TRANSCRIPT and placed on the City of San Diego website at:

<http://www.sandiego.gov/city-clerk/officialdocs/notices/index.shtml>

**SCOPING MEETING:** Two public scoping meetings will be held by the City of San Diego's Planning Department one on **Tuesday, December 9, 2014** from 5:30 p.m. to 7:30 PM at the South Bay Recreation Center located at 1885 Coronado Avenue, San Diego CA 92154, and one on **Thursday, December 11, 2014** from 6:00 PM to 8:00 PM at the Public Utilities Department Metropolitan Operations Complex located at 9192 Topaz Way, San Diego CA 92123. **Please note that depending on the number of attendees, the meeting could end earlier than the end times noted above.** Verbal and written comments regarding the scope and alternatives of the proposed EIR will be accepted at the meeting.

Please send in written/mail-in comments may also be sent to the following address: **Myra Herrmann, Environmental Planner, City of San Diego Development Services Center, 1222 First Avenue, MS 501, San Diego, CA 92101** or e-mail your comments to [DSDEAS@sandiego.gov](mailto:DSDEAS@sandiego.gov) with the Project Name and Number in the subject line Number in the subject line within 30 days of the receipt of this notice/date of the Public Notice above. Responsible agencies are requested to indicate their statutory responsibilities in connection with this project when responding. An EIR incorporating public input will then be prepared and distributed for the public to review and comment.

**PROJECT NAME / No.: PURE WATER PROGRAM / 386038**

**COMMUNITY AREAS:** Citywide

**COUNCIL DISTRICT:** All Council Districts

**PROJECT DESCRIPTION:** The Pure Water San Diego Program (Pure Water Program) is the City of San Diego Public Utilities Department (PUD) proposed program to provide a safe, secure, and sustainable local drinking water supply for San Diego. Advanced water purification technology will be used to produce potable water from recycled water. The Pure Water Program consists of the design and construction of new advanced water treatment facilities, wastewater treatment facilities, pump stations, transmission lines, and pipelines.



The City of San Diego (City) and its regional partners face significant issues with water supply and wastewater treatment. Water is critical to the health, safety, and quality of life of people living in the San Diego region. Currently eight-five percent (85%) of the region's water supply is imported. The region's reliance on imported water causes our water supply to be vulnerable to impacts from shortages and susceptible to price increases beyond our control. As sources of local water supply are few, we have explored non potable and potable reuse options of treated water. Water reuse is proven, safe, reliable, and is currently in use in other communities in the United States and around the world.

A decision must be made regarding the future treatment process at the City of San Diego's Point Loma Wastewater Treatment Plant (PLWTP). The PLWTP operates with a Clean Water Act (CWA) Section 301(h) modified National Pollutant Elimination Discharge System (NPDES) permit which allows the City to operate without full secondary treatment. The current modified permit expires on July 30, 2015. PUD is in the process of submitting a new permit application and working with the Environmental Protection Agency (EPA) as well as with local environmental groups to gain legislative or administrative approval for the concept of "secondary equivalency" within the Clean Water Act -- a plan to meet modified treatment standards that would be the same as if the existing 240 million gallon per day (mdg) PLWTP were converted to secondary treatment standards.

The Pure Water Program is a significant water and wastewater Capital Improvement Program that will create up to 83 million gallons per day of locally controlled water and reduce flows to the PLWTP which would reduce total suspended solids discharged and recycle a valuable and limited resource that is currently discharged to the ocean.

The Pure Water Program is a twenty year program that will involve the planning, design, and construction of new advanced water treatment facilities, wastewater treatment facilities, pump stations, and pipelines. The Pure Water program will also include property and easement acquisition, discretionary permitting, property acquisition, financing, facility startup, testing, operation and maintenance of new facilities, and significant public education and community engagement.

**Applicant:** City of San Diego, Public Utilities Department

**Recommended Finding:** Pursuant to Section 15060(d) of the CEQA Guidelines, it appears that the proposed project may result in significant environmental impacts in the following areas: **Land Use, Visual Effects and Neighborhood Character, Air Quality/Odor, Greenhouse Gas Emissions, Biological Resources, Historical Resources, Health and Safety, Hydrology and Water Quality, Geology/Soils and Seismic Hazards, Noise Paleontological Resources, Transportation/Circulation, Energy, Public Services and Facilities, Public Utilities, and Water Supply.**

**Availability in Alternative Format:** To request the this Notice or the City's letter to the applicant detailing the required scope of work (EIR Scoping Letter) in alternative format, call the Planning Department at (619) 235-5200 (800) 735-2929 (TEXT TELEPHONE).

**Additional Information:** For environmental review information, contact Myra Herrmann at (619) 446-5372. The Scoping Letter and supporting documents may be reviewed, or purchased for the cost of reproduction, in the Planning Department on the at the Fifth floor of the Development Services Center. For information regarding public meetings/hearings on this project, contact the Project Manager, Keli Balo, at (858) 292-6423 or via email: [kbalo@sandiego.gov](mailto:kbalo@sandiego.gov). This notice was published in the SAN DIEGO DAILY TRANSCRIPT and distributed on November 24, 2014.

Cathy Winterrowd  
Deputy Director  
Planning Department

**DISTRIBUTION:** See Attached

**ATTACHMENTS:** Figure 1 – Project Components and Location Map



**DISTRIBUTION:****United States Government**

Federal Aviation Administration (1)  
Naval Facilities Engineering Command, SW Division, Environmental Planning (12)  
MCAS Miramar (13)  
Marine Corps Recruit Depot Facilities Div. (14)  
Environmental Protection Agency (19)  
U. S. Fish and Wildlife Service (23)  
USDA Natural Resources Conservation Services (25)  
Army Corps of Engineers (26)  
Cleveland National Forest (29)

**State of California**

Caltrans District 11 (31)  
Department of Fish and Wildlife (32)  
Cal Recycle (35)  
Dept of Health Services Division of Drinking Water & Environmental Mgmt (36)  
California Environmental Protection Agency (37A)  
Department of Toxic Substance Control (39)  
State Parks (40A)  
Department of Parks and Recreation (40B)  
Natural Resources Agency (43)  
Regional Water Quality Control Board, Region 9 (44)  
Department of Water Resources (45)  
State Clearinghouse (46A)  
California Coastal Commission (47)  
California Air Resources Board (49)  
California Transportation Commission (51)  
California Transportation Commission (51A)  
California Boating & Waterways (52)  
California State Coastal Conservancy (54)  
State Water Resources Control Board Division of Clean Water Programs (55)  
Native American Heritage Commission (56)  
California Energy Commission (59)  
California Dept. of Conservation (60)  
California State Lands Commission (62)

**San Diego County**

Agriculture Department (64)  
Air Pollution Control Board (65)  
Planning and Land Use (68)  
Parks Department (69)  
Noise Control Hearing Board (71)  
Public Works (72)  
County Water Authority (73)  
Department of Environmental Health (76)

**City of San Diego**

Office of the Mayor (91)

Scott Chadwick

Stacey LoMedico

Tony Heinrichs

David Graham

Ron Villa

Council President Gloria, District 3

Council President Pro Tem Lightner, District 1

Councilmember Harris, District 2

Councilmember Cole, District 4

Councilmember Kersey, District 5

Councilmember Zapf, District 6

Councilmember Sherman, District 7

Councilmember Alvarez, District 8

Councilmember Emerald, District 9

**Public Utilities Department (Applicant)**

Halla Razak, Director

Mike Elling

Keli Balo

**Planning Department**

Tom Tomlinson, Interim Director

Cathy Winterrowd

Nancy Bragado

Myra Herrmann

Kristy Forburger

Jeanne Krosch

**Development Services Department**

Robert Vacchi, Director

Kerry Santoro

Martha Blake

Jeff Szymanski

Elizabeth Shearer-Nguyen

Anna McPherson

Anita Eng

Leonard Wilson

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Marnell Gibson

Carrie Purcell

**Economic Development**

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Jim Davies (MS 56D)

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Herman Parker, Director

Chris Zirkle

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Chief Javier Mainar

Fire and Life Safety Services (79)

Kenneth Barnes, Fire –Rescue Dept Logistics (80)

Police Department

Chief Shelley Zimmerman

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Transportation & Storm Water Department

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Andrew Kleis

Ruth Kolb

Linda Marabian

Real Estate Assets Department

Cybele Thompson, Director

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Beckwourth Branch Library (81C)

Benjamin Branch Library (81D)

Carmel Mountain Ranch Branch Library (81E)

Carmel Valley Branch Library (81F)

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Clairemont Branch Library (81H)

College-Rolando Branch Library (81I)

Kensington-Normal Heights Branch Library (81K)

La Jolla/Riford Branch Library (81L)

Linda Vista Branch Library (81M)

Logan Heights Branch Library (81N)

Malcolm X Library & Performing Arts Center (81O)

Mira Mesa Branch Library (81P)

Mission Hills Branch Library (81Q)

Mission Valley Branch Library (81R)

North Clairemont Branch Library (81S)

North Park Branch Library (81T)

Oak Park Branch Library (81U)

Ocean Beach Branch Library (81V)

Otay Mesa-Nestor Branch Library (81W)

Pacific Beach/Taylor Branch Library (81X)

Paradise Hills Branch Library (81Y)

Point Loma/Hervey Branch Library (81Z)

Rancho Bernardo Branch Library (81AA)

Rancho Peñasquitos Branch Library (81BB)

READ San Diego (81CC)

San Carlos Branch Library (81DD)

San Ysidro Branch Library (81EE)

Scripps Miramar Ranch Branch Library (81FF)

Serra Mesa Branch Library (81GG)



Skyline Hills Branch Library (81HH)  
Tierrasanta Branch Library (81II)  
University Community Branch Library (81JJ)  
North University Branch Library (81JJJ)  
University Heights Branch Library (81KK)

*City Government*

Civic San Diego (242)  
San Diego Housing Commission (88, MS 49N)  
Community Forest Advisory Board (90)  
Park and Recreation Board (83, MS 37C)  
Small Business Advisory Board (MS 904)  
Historical Resources Board (87)  
Wetland Advisory Board (91A)  
La Jolla Shores PDO Advisory Board (279)

*City Advisory Committees*

Mission Bay Park Committee (318A, MS 39)  
Airports Advisory Committee (MS 14)

**Other City Governments**

City of Chula Vista (94)  
City of El Cajon (97)  
City of Escondido (98)  
City of Imperial Beach (99)  
City of National City (102)  
City of Poway (103)  
City of Santee (104)  
San Diego Association of Governments (108)  
San Diego Unified Port District (109)  
San Diego County Regional Airport Authority (110)  
Metropolitan Transit System (112/115)  
San Diego Gas & Electric (114)  
San Dieguito River Park JPA (116)

**School Districts**

Chula Vista School District (118)  
Grossmont Union High School District (120)  
La Mesa-Spring Valley School District (121)  
National School District (123)  
Poway Unified School District (124)  
San Diego Unified School District (125)  
San Ysidro School District (127)  
Santee School District (128)  
South Bay Unified School District (130)  
San Diego Community College District (133)  
UCSD (134)

### **Community Groups, Associations, Boards, Committees and Councils**

Community Planners Committee (194)  
Balboa Park Committee (226, MS 35)  
Black Mountain Ranch –Subarea I (226C)  
Otay Mesa - Nestor Planning Committee (228)  
Otay Mesa Planning Committee (235)  
Clairemont Mesa Planning Committee (248)  
Greater Golden Hill Planning Committee (259)  
Serra Mesa Planning Group (263A)  
Kearny Mesa Community Planning Group (265)  
Linda Vista Community Planning Committee (267)  
La Jolla Community Planning Association (275)  
City Heights Area Planning Committee (287)  
Kensington-Talmadge Planning Committee (290)  
Normal Heights Community Planning Committee (291)  
Eastern Area Planning Committee (302)  
Midway/Pacific Highway Community Planning Group (307)  
Mira Mesa Community Planning Group (310)  
Mission Beach Precise Planning Board (325)  
Mission Valley Unified Planning Organization (331)  
Navajo Community Planners Inc. (336)  
Carmel Valley Community Planning Board (350)  
Del Mar Mesa Community Planning Board (361)  
North Park Planning Committee (363)  
Ocean Beach Planning Board (367)  
Old Town Community Planning Committee (368)  
Pacific Beach Community Planning Committee (375)  
Pacific Highlands Ranch – Subarea III (377A)  
Rancho Peñasquitos Planning Board (380)  
Peninsula Community Planning Board (390)  
Rancho Bernardo Community Planning Board (400)  
Sabre Springs Community Planning Group (406B)  
San Pasqual - Lake Hodges Planning Group (426)  
San Ysidro Planning and Development Group (433)  
Scripps Ranch Community Planning Group (437)  
Miramar Ranch North Planning Committee (439)  
Skyline - Paradise Hills Planning Committee (443)  
Torrey Hills Community Planning Board (444A)  
Southeastern San Diego Planning Committee (449)  
Encanto Neighborhoods Community Planning Group (449A)  
College Area Community Planning Board (456)  
Tierrasanta Community Council (462)  
Torrey Highlands – Subarea IV (467)  
Torrey Pines Community Planning Board (469)  
University City Community Planning Group (480)  
Uptown Planners (498)

### **Town/Community Councils**

Town Council Presidents Association (197)  
Barrio Station, Inc. (241)  
Downtown Community Council (243)  
Harborview Community Council (245)  
Clairemont Town Council (257)  
Serra Mesa Community Council (264)  
La Jolla Town Council (273)

Rolando Community Council (288)  
Oak Park Community Council (298)  
Darnell Community Council (306)  
Mission Beach Town Council (326)  
Mission Valley Community Council (328 C)  
San Carlos Area Council (338)  
Carmel Mountain Ranch Community Council (344)  
Ocean Beach Town Council, Inc. (367 A)  
Pacific Beach Town Council (374)  
Rancho Penasquitos Town Council (383)  
Rancho Bernardo Community Council, Inc. (398)  
San Dieguito Planning Group (412)  
United Border Community Town Council (434)  
Tierrasanta Community Council (462)  
Murphy Canyon Community Council (463)

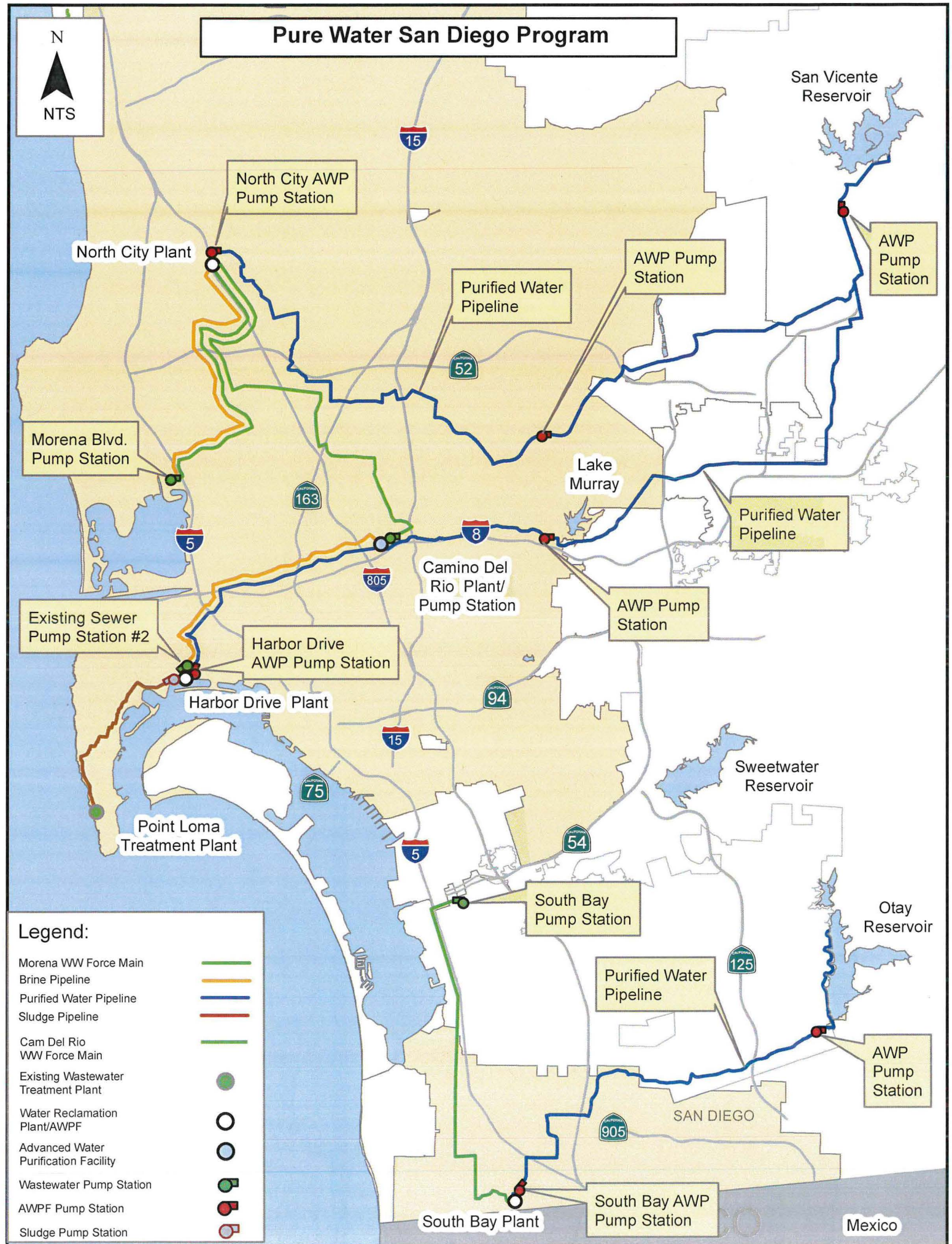
**Other Agencies, Organizations and Individuals**

San Diego Chamber of Commerce (157)  
Building Industry Association (158)  
San Diego River Park Foundation (163)  
San Diego River Coalition (164)  
Sierra Club (165)  
San Diego Canyonlands (165A)  
San Diego Natural History Museum (166)  
San Diego Audubon Society (167)  
Jim Peugh (167A)  
San Diego River Conservancy (168)  
Environmental Health Coalition (169)  
California Native Plant Society (170)  
San Diego Coast & Baykeeper (173)  
Citizens Coordinate for Century 3 (179)  
Endangered Habitats League (182 & 182A)  
San Diego Tracking Team (187)  
League of Women Voters (192)  
National City Chamber of Commerce (200)  
Carmen Lucas (206)  
South Coastal Information Center (210)  
San Diego Historical Society (211)  
San Diego Archaeological Center (212)  
Save Our Heritage Organization (214)  
Ron Chrisman (215)  
Clint Linton (215B)  
Frank Brown - Inter-Tribal Cultural Resource Council (216)  
Campo Band of Mission Indians (217)  
San Diego County Archaeological Society Inc. (218)  
Kuumeyaay Cultural Heritage Preservation (223)  
Kuumeyaay Cultural Repatriation Committee (225)  
Native American Distribution  
    Barona Group of Capitan Grande Band of Mission Indians (225A)  
    Campo Band of Mission Indians (225B)  
    Ewiiapaayp Band of Mission Indians (225C)  
    Inaja Band of Mission Indians (225D)  
    Jamul Indian Village (225E)  
    La Posta Band of Mission Indians (225F)  
    Manzanita Band of Mission Indians (225G)



Sycuan Band of Mission Indians (225H)  
 Viejas Group of Capitan Grande Band of Mission Indians (225I)  
 Mesa Grande Band of Mission Indians (225J)  
 San Pasqual Band of Mission Indians (225K)  
 Ipai Nation of Santa Ysabel (225L)  
 La Jolla Band of Mission Indians (225M)  
 Pala Band of Mission Indians (225N)  
 Pauma Band of Mission Indians (225O)  
 Pechanga Band of Mission Indians (225P)  
 Rincon Band of Luiseno Indians (225Q)  
 San Luis Rey Band of Luiseno Indians (225R)  
 Los Coyotes Band of Mission Indians (225S)  
 Otay Valley Regional Park CAC – John Willett (227)  
 Tijuana River National Estuarine Reserve (229)  
 Chuck Tanner – County San Diego OVRP Rep (232)  
 Downtown San Diego Partnership (237)  
 Deron Bear – Marion Bear Natural Park Recreation Council (253)  
 Tecolote Canyon Citizens Advisory Committee (254)  
 Friends of Tecolote Canyon (255)  
 Tecolote Canyon Rim Owner's Protection Association (256)  
 Friends of Switzer Canyon (260)  
 Marion Bear Natural Park Recreation Council (266A/267A)  
 UCSD Natural Reserve System (284)  
 Theresa Quiroz (294)  
 John Stump (304)  
 Chollas Lake Park Recreation Council (305)  
 Friends of Los Peñasquitos Canyon Preserve, Inc. (313)  
 Surfer's Tired of Pollution (318)  
 Debbie Knight (320)  
 League of Conservation Voters (322)  
 Mission Bay Lessees (323)  
 San Diego River Conservancy (330A)  
 Friends of the Mission Valley Preserve (330B)  
 River Valley Preservation Project (334)  
 Mission Trails Regional Park Citizens Advisory Committee (341)  
 Carmel Valley Trail Riders Coalition (351)  
 Carmel Mountain Conservancy (354)  
 Los Peñasquitos Canyon Preserve Citizens Advisory Committee (360)  
 Ocean Beach Merchant's Association (367B)  
 Friends of Rose Canyon (386)  
 San Dieguito Lagoon Committee (409)  
 San Dieguito River Park CAC (415)  
 Friends of San Dieguito River Valley (419)  
 San Dieguito River Valley Conservancy (421)  
 RVR PARC (423)  
 Beeler Canyon Conservancy (436)  
 Jim Dawe (445)  
 Mission Trails Regional Park (465)

# Pure Water San Diego Program



## Legend:

- Morena WW Force Main
- Brine Pipeline
- Purified Water Pipeline
- Sludge Pipeline
- Cam Del Rio WW Force Main
- Existing Wastewater Treatment Plant
- Water Reclamation Plant/AWPF
- Advanced Water Purification Facility
- Wastewater Pump Station
- AWPF Pump Station
- Sludge Pump Station







## THE CITY OF SAN DIEGO

November 24, 2014

**SUBJECT:** Scope of Work for Draft Program Environmental Impact Report for the Pure Water San Diego Program ("Project"). Project No. 386038/SCH No. *Pending*

Based on the review of the project application and pursuant to the California Environmental Quality Act (CEQA) and State CEQA Guidelines, as amended, it has been determined by the City of San Diego Planning Department that the Project may have a significant effect on the environment and preparation of a Program Environmental Impact Report (PEIR) is required, in conjunction with City Council approval of the Pure Water Program (Process 5).

The purpose of this Scoping Letter is to identify specific issues to be addressed in the PEIR and shall be prepared in accordance with the City of San Diego *Environmental Impact Report Guidelines (updated December 2005)* and *California Environmental Quality Act - Significance Determination Thresholds prepared by the Development Services Department (January 2011)*. A Notice of Preparation (NOP) is being distributed concurrently to Trustee and Responsible Agencies and others who may have an interest in the project in accordance with CEQA Section 21083.9(a)(2) for projects of statewide, regional, or area-wide environmental impacts. Scoping Meetings have been scheduled for December 9 and 11, 2014. Changes or additions to the scope of work may be required as a result of input received in response to the Scoping Meetings and NOP. Furthermore, should the project scope be modified during the scoping stage or PEIR review process and/or by the applicant, these changes shall be disclosed in the PEIR under the section "History of Project Changes" and be accounted for in the PEIR impacts analysis to the extent required by CEQA.

Each section and issue area of the PEIR shall provide a descriptive analysis of the project followed by a comprehensive evaluation. The PEIR shall also include sufficient graphics and tables, which in conjunction with the relevant narrative discussions, provide a complete and meaningful description of all major project features, the environmental impacts of the project, as well as cumulative impacts, mitigation of significant impacts, and alternatives to the project.

### PROJECT DESCRIPTION

The Pure Water San Diego Program (Pure Water Program) is the City of San Diego Public Utilities Department (PUD) proposed program to provide a safe, secure, and sustainable local drinking water supply for San Diego. Advanced water purification technology will be used to produce potable water from recycled water. The Pure Water Program consists of the design and



construction of new advanced water treatment facilities, wastewater treatment facilities, pump stations, transmission lines, and pipelines.

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The Pure Water Program is a significant water and wastewater Capital Improvement Program that will create up to 83 million gallons per day of locally controlled water and reduce flows to the PLWTP which would reduce total suspended solids discharged and recycle a valuable and limited resource that is currently discharged to the ocean.

The Pure Water Program is a twenty year program that will involve the planning, design, and construction of new advanced water treatment facilities, wastewater treatment facilities, pump stations, and pipelines. The Pure Water program will also include property and easement acquisition, discretionary permitting, property acquisition, financing, facility startup, testing, operation and maintenance of new facilities, and significant public education and community engagement.

## **PROJECT LOCATION**

The Pure Water Program includes a variety of facilities located throughout San Diego County. The Program can be generalized into three major components: North City Area, South Bay Area, and the Central Area. Figure 1 shows the conceptual locations of new facilities and pipelines for the Pure Water Program.

## **GENERAL BACKGROUND AND PROJECT HISTORY**

In January 2004, the City Council approved a study to evaluate options to increase the use of recycled water produced at the City's two water reclamation plants, the North City Water

Reclamation Plant (North City) and the South Bay Water Reclamation Plant (South Bay). The Water Reuse Study (Water Reuse) identified reservoir augmentation with purified water at the City's San Vicente Reservoir as the preferred reuse strategy. In December 2007, the City Council voted to accept the Water Reuse Study and to proceed with the Water Purification Demonstration Project (Demonstration Project). The objective of the Demonstration Project was to determine the feasibility of turning recycled water produced at North City into drinkable water through the use of advanced water purification technology. A report on the Demonstration Pilot Project, which was operated for one year, was completed in March 2013, and on April 23, 2013 the City Council unanimously voted to accept the results of the Demonstration Project and continue to pursue potable reuse options for the City.

In 2010, the United States Environmental Protection Agency (EPA) granted the City of San Diego its third 301(h) modified National Pollutant Discharge Elimination System (NPDES) Permit. The 301(h) modification allows the City to continue operating the PLWTP as a chemically-enhanced primary treatment facility instead of upgrading the PLWTP to secondary treatment. The City's current permit expires on July 31, 2015.

During the 2010 NPDES permit renewal process, the San Diego Coastkeeper and the San Diego Chapter of the Surfrider Foundation entered into a Cooperative Agreement with the City to conduct a Recycled Water Study to find ways to maximize water reuse and minimize the flow to PLWTP. In accordance with the agreement, both organizations provided support to the EPA's decision to grant the modified permit.

The Recycled Water Study was completed in July 2012. The Study developed integrated water reuse alternatives which support both non-potable (irrigation) and potable reuse to augment the region's water supply and reduce reliance on imported water. This study is integral to this program and can be found at:

<http://www.sandiego.gov/water/pdf/purewater/2012/recycledfinaldraft120510.pdf>.

The Study identified locations for future advanced water purification facilities (AWP facilities). Two of these locations, North City and South Bay, are existing water reclamation plants. The proposed AWP facilities will be constructed on vacant land adjacent to these existing reclamation plants and will purify the recycled water they produce, to near distilled-water quality. The third AWP facility is proposed to be located at the Harbor Drive site which was recommended due to its proximity to Pump Station No.2 and the confluence of the vast majority of the wastewater generated within the Metro Sewerage System. The Recycled Water Study identified two City-owned and operated reservoirs (Otay Reservoir and the San Vicente Reservoir) as potential locations for reservoir augmentation.

The City Council accepted the Recycled Water Study report on July 17, 2012. Follow-up studies are currently being conducted and technical memorandums prepared to refine the information presented in the very high level evaluation of the alternatives presented in the Recycled Water Study.

During the April 23, 2013 acceptance of the Demonstration Project, the City Council directed staff to define in greater detail the City's potable reuse options, including direct potable reuse. These combined efforts of the Demonstration Project and the Recycled Water Study served to define the basic elements of the Pure Water San Diego Program.

Water reuse programs provide valuable water supplies by using resources that otherwise are sent to the ocean. The decision to invest in a water reuse program will affect the rates, reliability, and regional assets for decades. Potable reuse will reduce the flow to the Point Loma Wastewater Treatment Plant and is a component of the 2015 NPDES permit.

## **SUMMARY OF PURE WATER SAN DIEGO PROGRAM**

The key Pure Water Program facilities can be categorized as treatment, storage, and conveyance. Treatment facilities include the existing North City and South Bay Reclamation Plants (North City and South Bay), as well as a proposed Harbor Drive facility located near Lindbergh Field. Pump station and pipeline facilities are included for conveying different types of flows to and from the treatment facilities for: 1) diverting wastewater flows to advanced water purification facilities; 2) conveying purified water from treatment facilities to either the San Vicente or Lower Otay Reservoirs; and 3) transporting solid wastes from treatment processes to solids handling facilities.

The Pure Water Program consists of the design and construction of new advanced water treatment facilities, wastewater treatment facilities, pump stations, transmission lines and pipelines. All projects will be planned and coordinated with existing operations, in full compliance with applicable federal, state, and local regulations. The use of advanced water purification technology could account for up to one third of San Diego's future water supply. An initial 15 mgd purification facility is planned to be in operation by 2023. The long term goal, producing 83 million gallons of purified water per day, is planned to be reached by 2035.

## **NORTH CITY COMPONENT**

The North City Area component includes possible expansion of the existing North City Water Reclamation Plant, construction of a new Advanced Purification Facility, pipelines, and support facilities such as pump stations. The purified water will be piped to San Vicente Reservoir where it will blend with raw water in the reservoir.

Plans for the existing North City Water Reclamation Plant are to maximize the current plant capacity or expand the plant capacity to treat up to 48 mgd. This treatment capacity could yield between 15 and 30 mgd of purified water and up to 9.1 mgd of non-potable recycled water. The new advanced treatment facility would be located on the vacant City-owned lot across the street to the north of the plant. A new pump station, sewer force main, and a brine pipeline would be required to support the treatment facility at an expanded capacity. Pump stations and a new pipeline would be constructed between the advanced purification facility and the San Vicente Reservoir. A total of 15 to 30-mgd reduction in Point Loma flow is possible with this North City component.



## **SOUTH BAY COMPONENT**

The South Bay component of the Pure Water Program will include the expansion of the South Bay Water Reclamation Plant, installation of additional pump stations and pipelines to convey additional wastewater to the plant, and construction of an Advanced Water Purification Facility and a conveyance system to deliver purified water to the Otay Reservoir. The South Bay concept is capable of treating up to 44 mgd of wastewater and producing up to 15 mgd of purified water and 9 mgd of non potable reuse. The South Bay Concept will minimize flows discharged to the South Bay Outfall.

## **CENTRAL AREA COMPONENT**

The central area component includes the conceptual Harbor Drive treatment facility, which would be the largest proposed facility. Preliminary evaluations show that the site could accommodate up to 53 mgd of purified water. The 23-acre Harbor Drive Site is located near the convergence of the North and South Metro Interceptors, which carry all of the flows that are conveyed to the PLWTP.

Two Harbor Drive alternatives are included in the Pure Water Program. One would place all advanced and recycled water treatment at Harbor Drive. The second alternative addresses the possibility that the site may not be large enough for all of this treatment. In that case, the alternative would be to site only recycling facilities at Harbor Drive and build an advanced treatment facility on City-owned property in Mission Valley. Depending on the alternative, as well as on how much is diverted upstream at North City, the Harbor Drive facility would produce between 41 and 53 mgd of purified water. Pipelines would be built that connect the purified water from Harbor Drive to the San Vicente Reservoir. A brine pipeline would also be required to transport materials from the Mission Valley Facility to downstream of the Harbor Drive site. Additionally another pipeline would be needed between the Harbor Drive site and the PLWTP. This pipeline will be used to convey solids from the Harbor Drive Facility to the PLWTP. A total of 41 to 53-mgd reduction in Point Loma flow is possible with this Central Area component.

## **AMENDMENTS TO PLANNING DOCUMENTS**

Various components of the Program may require amendment to specific planning documents prior to project implementation.

## **PROJECTS WITHIN THE SCOPE OF THE PEIR**

Another purpose of this or any other PEIR is to streamline future environmental review of projects found to fall within the scope of the PEIR. The PEIR for this Project will address and evaluate the potential components of the Pure Water Program at a general programmatic level. The PEIR is not intended or structured to evaluate project level impacts associated with future implementation of any of the treatment facilities or pipelines, although the PEIR may provide information and analyses that could be used in conjunction with future project-level environmental reviews of such improvements. Any subsequent activities proposed for the Pure Water Program, such as approvals and implementation of individual components of the Program,

will be reviewed for consistency with the PEIR. Project level impacts of subsequent activities are subject to additional environmental review in accordance with CEQA.

Pursuant to the CEQA Guidelines (Section 15168), a Program EIR allows the lead agency to consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts, and allow reduction in paperwork. In addition, it may be used with the intent of streamlining and limiting the later environmental review required for projects that implement the components of the Program.

### **PEIR FORMAT AND CONTENT**

The PEIR serves to inform governmental agencies and the public of a project's environmental impacts. Emphasis on the PEIR must be on identifying feasible solutions to environmental problems. The objective is not simply to describe and document an impact, but to actively create and suggest mitigation measures or project alternatives that would avoid or substantially reduce the significant adverse environmental impacts. The adequacy of the PEIR will depend greatly on the thoroughness of this effort. The PEIR must be written in an objective, clear and concise manner, and must meet the requirements of CEQA. Wherever possible, use graphics to replace extensive word descriptions and to assist in clarification. Conclusions must be supported by substantial evidence presented in the PEIR or otherwise contained in the administrative record, with quantitative, as well as qualitative information to the extent practicable.

Prior to distribution of the Draft PEIR (DPEIR), Conclusions will be attached to the front of the DPEIR. The Conclusions cannot be prepared until a DPEIR has been submitted and accepted for release by the City. The DPEIR shall include a Title Page which includes the Project Number, State Clearinghouse Number (SCH No.) and the date of publication and an Executive Summary, reflecting the DPEIR outline for each issue area identified below in Section V, but need not contain every element of the DPEIR. Additional information regarding specific content and formatting of the DPEIR can be found in the City's *Environmental Impact Report Guidelines* (updated December 2005) as outlined below.

### **I. INTRODUCTION**

Introduce the proposed project with a brief discussion on the intended use and purpose of the PEIR. Describe and/or incorporate by reference any previously certified environmental documents that address the project site. Summarize the discretionary City actions associated with the project and other local, state, or federal approvals or reviews anticipated to occur for the project, with the more detailed description of required approvals to be projects in Section III-Project Description. This section should also describe the basis for how this PEIR will be used for subsequent environmental review of projects implemented in accordance with the Program and/or additional required approvals (if applicable).

## **II. ENVIRONMENTAL SETTING**

The Draft PEIR should (i) describe the precise location of the Project and present it on a detailed topographic map and regional map; (ii) provide a local and regional description of the environmental setting of the project, as well as adjacent land uses, area topography, drainage characteristics and vegetation; and (iii) include any applicable land use plans/overly zones that affect the Project site, such as the City of San Diego's Multiple Species Conservation Program (MSCP)/Multi-Habitat Planning Area (MHPA), environmentally sensitive lands such as steep hillsides, wetlands, and the Federal Emergency Management Agency (FEMA) 100 year floodplains or floodways that intersect with the project components.

## **III. PROJECT DESCRIPTION**

The Draft PEIR shall include a statement of the objectives of the proposed project, including a description of the underlying purpose of the project. A clearly written statement of the project objectives will assist in defining a reasonable range of alternatives to include in the Draft PEIR, which would avoid or substantially reduce potentially significant impacts. This section of the document should include a discussion of all discretionary actions required for Project approval and implementation, including but not limited to a description of all permits and approvals required by local, state, federal, and other regulatory agencies.

For the purpose of this analysis the Project shall include all improvements needed to implement the Pure Water San Diego Program. This includes all potential treatment facilities, pump stations, pipelines and associated appurtenances.

Pursuant to the CEQA Guidelines (Section 15168), a Program EIR allows the lead agency to consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts, and allow reduction in paperwork. In addition, it may be used with the intent of streamlining and limiting the later environmental review required for projects that implement the components of the Program.

## **IV. HISTORY OF PROJECT CHANGES**

This section of the PEIR shall outline the history of the project and any material changes that have been made to the proposed project in response to environmental concerns raised during public and agency review of the project (i.e., in response to NOP or public scoping meetings or during the public review period for the Draft PEIR).

## **V. ENVIRONMENTAL ANALYSIS**

The potential for significant environmental impacts must be thoroughly analyzed and mitigation measures identified that would avoid or substantially lessen any such significant impacts. The EIR must represent the independent analysis of the City of San Diego as

Lead Agency; therefore, all impact analysis must be based on the City's current *California Environmental Quality Act - Significance Determination Thresholds prepared by the Development Services Department (January 2011)*.

The analysis shall include all potential Pure Water Program components that may be implemented and would provide a comprehensive approach to outlining potential environmental effects.

Future projects implemented in accordance with the Pure Water Program have the potential to impact resources, and therefore the PEIR Project Description should include a discussion of the analytical framework proposed for addressing the potential environmental impacts of the Program, recognizing that the PEIR will provide a general evaluation of the impacts associated with the overall Program, while the specific impacts particular to individual components of the Program may be further evaluated when subsequent project-level components are proposed. Mitigation identified in the PEIR will take the form of a Mitigation Framework, which will lay the foundation for how future projects are reviewed to assure compliance with the program framework documented in the subsequent environmental review process. Considerations to be addressed in the Mitigation Framework shall include, but not be limited to:

- (1) the different levels of planning and design of various components of the Pure Water Program, with some being fairly well-defined at this point and others being more conceptual in nature, which influences the degree of specificity that certain impacts can be addressed in the PEIR or may need to be further evaluated in subsequent environmental reviews;
- (2) the proposed Pure Water Program components extend over a very large and diverse geographic area, and the PEIR's description of existing conditions that may be impacted by the Project will draw from a variety of existing data sources considered suitable and appropriate for a program level of analysis, and may be supplemented by more current and focused data developed in conjunction with subsequent project-level environmental reviews;
- (3) the ability to draw definitive conclusions regarding the significance of potential impacts will in certain cases be influenced by degree of project design specificity available and the nature and amount of data available regarding existing conditions – hence, such significance conclusions will be based on substantial evidence that is reasonable and appropriate for a program level of analysis and subject to further consideration at subsequent project-level environmental reviews;
- (4) The PEIR discussion of mitigation measures will be influenced by the amount and degree of specificity of information available at the time of PEIR preparation. In cases where the specifics of a mitigation measure(s) are not possible to define at the program level, the mitigation discussion will include a clear description of the necessary outcome of the mitigation (i.e., establish a specific performance standard(s) for mitigation) and identify the basic elements of, and/or options for, measures that can be



implemented to achieve that outcome with the details of those measures to be defined in future project-level environmental reviews. This approach to mitigation at the program level cannot, however, defer to future studies to determine whether a significant impact would actually occur and/or defer a basic assessment of whether there are feasible measures to mitigate anticipated significant impacts; and

(5) The PEIR will address a reasonable range of alternatives for the Pure Water Program. Subsequent project-level reviews of individual components of the Program may include an evaluation of alternatives to the specific design and location of the individual component, it is not anticipated that alternatives to the overall Pure Water Program will be revisited in subsequent environmental reviews associated with the Project.

Below are key environmental issue areas that have been identified for this Project, within which the issue statements must be addressed individually. Discussion of each issue statement should include an explanation of the existing site conditions, impact analysis, significance determination, and appropriate mitigation. The impact analysis should address potential direct, indirect, and cumulative impacts that could be created through implementation of the proposed Project and its alternatives. Each issue shall be summarized along with a summary of whether or not future projects under the Pure Water Program are required to analyze the issue further during subsequent project-level CEQA review.

#### **LAND USE**

**Issue 1: Would the Pure Water Program be inconsistent or conflict with the environmental goals, objectives, and recommendations of the City of San Diego General Plan (General Plan), the City of San Diego Municipal Code, or the various community plans where the project would be located, the Naval Training Center REUSE Plan, or other applicable land use plans?**

**Issue 2: Would the Pure Water Program result in a conflict with the provisions of the MSCP or other adopted environmental plans for the area?**

**Issue 3: Would the Pure Water Program result in land uses which are not compatible with an adopted Airport Land Use Compatibility Plan (ALUCP)?**

The PEIR should evaluate how the Pure Water Program accomplishes or fails to implement the environmental goals, objectives, and recommendations of the General Plan, San Diego Municipal Code, San Diego's City's Land Development Code and relevant community plans. If any inconsistencies are identified, the Land Use Section of this PEIR should also identify if these inconsistencies would result in a direct or indirect environmental impact. The PEIR should also address the land use compatibility with final MSCP Plan (August 1998), and the City's MSCP Subarea Plan (March 1997) and other environmental plans.

## **VISUAL EFFECTS AND NEIGHBORHOOD CHARACTER**

**Issue 1: Would the Pure Water Program result in a substantial change to natural topography or other ground surface relief features through landform alteration?**

**Issue 2: Would implementation of the Pure Water Program result in the blockage of public views from designated open space areas, roads, or to any significant visual landmarks or scenic vistas?**

**Issue 3: Would the Pure Water Program result in substantial alteration to the existing character of the area?**

**Issue 4: Would the Pure Water Program be compatible with surrounding development in terms of bulk, scale, materials, or style?**

To the extent feasible, the PEIR should include an evaluation of potential impacts on the natural landforms resulting from implementation of project components. The City's Significance Determination Thresholds include, but are not limited to, the following in determining such impacts: exceed the allowed height or bulk regulations and existing patterns of development in the surrounding area by a significant margin; and/or located in a highly visible area and would strongly contrast with the surrounding development or natural topography through excessive bulk, signage, or architectural projection. If any project components include such elements, this section of the PEIR should, therefore, include a conceptual description and analysis of the allowed building mass, bulk, height, and architectural style that could result from the Program. The EIR shall also analyze the use of materials or components that could emit or reflect a significant amount of light or glare and any potential effect on light sensitive species or on adjacent aviation uses. Renderings, cross sections and visual simulations of the proposal should be incorporated into the EIR section when possible.

## **AIR QUALITY/ODOR**

**Issue 1: Would the Pure Water Program conflict with or obstruct the implementation of the applicable air quality plan?**

**Issue 2: Would the Pure Water Program result in a violation of any air quality standard or contribute substantially to an existing or projected air quality violation?**

**Issue 3: Would implementation of the Pure Water Program result in air emissions that would substantially deteriorate ambient air quality, including the exposure of sensitive receptors to substantial pollutant concentrations?**

**Issue 4: Would the Pure Water Program create objectionable odors affecting a substantial number of people?**

**Issue 5: Would the Pure Water Program exceed 100 pounds per day of respirable particulate matter (PM<sub>10</sub>) or 55 pounds per day of fine particulate matter (PM<sub>2.5</sub>)?**

The PEIR should describe the area's climatological setting within the San Diego Air Basin and the basin's current attainment levels for State and Federal Ambient Air Quality Standards (AAQS). It should discuss both the potential stationary and non-stationary air emission sources related to the land use modifications associated with the Program particularly vehicle and facility emission sources as well as dust creation during construction.

The PEIR will include a qualitative description of potential impacts to air quality and compliance with AAQS associated with subsequent activities that implement the Program. While a detailed quantified analysis of future project impacts to air quality would not be addressed in the PEIR, and future project-level impacts would be subject to subsequent environmental review under CEQA, a general quantification of construction-related emissions estimated to occur with typical construction activities associated with treatment plants and pipelines, drawing from examples of other similar type facilities completed by PUD will be included in the PEIR. To the extent there are similar analogous quantified data available for operations-related emissions associated with such facilities, such information will be included in the PEIR.

The PEIR should discuss the Program's impact on the ability of the San Diego Air Basin to meet regional air quality strategies (RAQS). It should discuss any short, long-term, and cumulative impacts the project may have on regional air quality, including construction and transportation-related sources of air pollutants, and the potential impacts from the increase in vehicle trips to the RAQS, the overall air quality impacts from such trips, and any proposed mitigation measures.

**GREENHOUSE GASES**

**Issue 1: Would the Pure Water Program generate GHG emissions that may have a significant cumulative impact on the environment?**

**Issue 2: Would the Pure Water Program conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emission of GHGs?**

The PEIR shall provide a description of the existing global context in which climate change impacts are occurring and are expected to occur in the future; a summary of the relevant state laws that address climate change; a description of relevant statewide and/or regional GHG inventories to which the project would contribute; a quantification of the project's direct and indirect GHG emissions and compare them to baseline conditions; a discussion of whether the project would enhance or impede the attainment of state GHG reduction targets

and its relationship to local plans and policies; and a description of the cumulative, global climate change impacts to which the project would contribute.

Furthermore, an estimate of the project generated greenhouse gas emissions shall be provided in this section. The projected greenhouse gas emissions with and without the Program shall be compared and incorporated into a qualitative discussion of the significance of the emissions relative to global climate change.

If the Program results in emissions exceeding 900 metric tons per year, a GHG analysis shall be done. The analysis should include, but it is not limited to the five primary sources of GHG emissions: vehicular traffic, generation of electricity, natural gas consumption/combustion, solid waste generation and water usage.

The analysis of greenhouse gas impacts shall include a discussion of the Program's compatibility with the City of San Diego draft Climate Action Plan.

#### **BIOLOGICAL RESOURCES**

- Issue 1: Would the proposed Pure Water Program result in impacts to a sensitive habitat or sensitive natural community as identified in local, regional, state or federal plans, policies, or regulations?**
- Issue 2: Would the proposed Pure Water Program result in an impact on City, State, or Federally regulated wetlands through direct removal, filling, hydrological interruption or other means?**
- Issue 3: Would implementation of the proposed Pure Water Program result in a reduction in the number of any unique, rare, endangered, sensitive, or fully protected species of plants or animals?**
- Issue 4: Would the proposed Pure Water Program result in interference with the movement of any native resident or migratory wildlife through linkages or wildlife corridors?**
- Issue 5: Would the Pure Water Program conflict with provisions of adopted local habitat conservation plans or policies protecting biological resources?**
- Issue 6: Would the Pure Water Program introduce land uses within or adjacent to the MHPA that would result in adverse edge effects?**
- Issue 7: Would the Pure Water Program introduce invasive species into natural open space areas?**



A series of diverse habitats and sensitive species could potentially be directly or indirectly affected by the Program and to the extent feasible, should be fully discussed in this section of the PEIR. A biological resources constraints analysis, based on existing inventory of biological resources should be prepared to address existing conditions, potential constraints, and opportunities related to biological resources within the project study area. The analysis should also include limited site reconnaissance as necessary to accurately represent the existing conditions discussion of the PEIR. The analysis must identify any rare and sensitive species, MSCP covered and narrow endemic flora and fauna, which are known to be, or to have a potential to exist, in the Program area as well as an inventory of sensitive habitat types and wetlands.

The impacts to identifiable wetland habitat should be addressed within this section of the PEIR. Wetland habitat types should be shown graphically and include recommendations to sustain their functionality. If impacts to any wetlands or wetlands buffers are identified, a discussion of the feasibility or infeasibility of avoiding such impacts should be included. The analysis must identify whether the project and associated components would have any adverse effects on existing reservoirs and related marine habitat.

Encroachment into the City's MHPA and Cornerstone Lands and County's PAMA would occur with the Program. Both the biological constraints analysis and the Biological Resources section of the PEIR should disclose potential preserve boundary adjustments that may be required with implementation of subsequent activities that implement the Program.

### **HISTORICAL RESOURCES**

**Issue 1: Would the Pure Water Program result in the alteration or destruction of a prehistoric or historic archaeological site, or any adverse physical or aesthetic effects to a prehistoric or historic building, structure, object, or site?**

**Issue 2: Would the Pure Water Program result in any impact to existing religious or sacred uses or result in the disturbance of any human remains within the potential impact area?**

The Program includes improvements located in or near areas where archeological sites have been previously recorded. The project could have a potentially significant impact on these sites. A cultural resources report should be prepared for the proposed project (including facilities and pipelines) to address existing conditions, potential constraints and opportunities related to cultural and historic resources within the project area. The analysis should include a records search of local databases and limited site reconnaissance as necessary to accurately represent the existing conditions discussion of the PEIR. A report shall be prepared in accordance with the City of San Diego's Land Development Code Historical Resources Guidelines (amended April 30, 2001) and discussed in the PEIR. Based on background research and review of archaeological site records, the PEIR should identify areas of high, moderate or low sensitivity and provide recommendations for further evaluation to determine significance when applicable and include recommendations for

appropriate mitigation. The PEIR should identify a Mitigation Framework for implementation with subsequent projects, as well as requirements for archaeological monitoring during grading operations and specific mitigation requirements for discoveries. This section must also include a discussion of potential impacts to Native American cultural resources and include an ethnographic discussion of the San Diego tribal community relative to the project study area.

### **HEALTH AND SAFETY**

**Issue 1: Would the Pure Water Program expose people or property to health hazards, including fire?**

**Issue 2: Would the Pure Water Program create future risk of an explosion or the release of hazardous substance (including, but not limited to gas, oil, pesticides, chemicals, or radiation)? Would the proposed Program expose people or the environment to a significant hazard through the routine transport, use, or disposal of hazardous materials?**

**Issue 3: Would any component of the Pure Water Program interface or intersect with a site that is included on a hazardous material sites list compiled pursuant to Government Code Section 6596.25 and, as a result, pose a potential hazard to the public or environment?**

**Issue 4: Would the Pure Water Program result in a safety hazard for people working in a designated airport influence area?**

Various aspects of water treatment employ the use of chemicals, gases, and potentially hazardous processes. Provide an analysis of the hazardous materials to be stored, used and transported for this Program. Assess the potential for significant human health and safety impacts.

The Program proposes to supplement the regions drinking water supply with purified water. Discuss the potential of water contamination from mishandling, error, or equipment malfunction and the potential for significant human health or public safety impacts. Given that military uses have occurred within portions of the Program area, the PEIR should address the potential for unexploded ordnance (UXO) as defined by the U.S. Army Corps of Engineers (USACOE).

The PEIR will include a qualitative description of potential hazards and hazardous materials issues that intersect or interface with the Program area including disclosure of sites on a list maintained by the State which has been compiled in accordance with Government Code Section 6596.25. However, a quantified analysis would not be addressed in the PEIR. The PEIR should provide recommendations for when future project review would be required to conduct site assessments as part of subsequent environmental review under CEQA.

## **HYDROLOGY**

**Issue 1: Would the Pure Water Program increase impervious surfaces and associated increased runoff?**

**Issue 2: Would the Pure Water Program result in a substantial alteration to on-and off-site drainage patterns due to changes runoff flow rates or volumes?**

Hydrology deals with the properties, distribution, and circulation of surface water, ground water, and atmospheric water. The quantity of water which flows in a creek or river is calculated based on historic climatic conditions combined with the watershed characteristics. The slope and shape of the watershed, soil properties, recharge area, and relief features are all watershed characteristics that influence the quantity of surface flows. The PEIR will address the existing conditions, potential constraints and opportunities related to hydrology resources within the project study area.

## **WATER QUALITY**

**Issue 1: Would the Pure Water Program create discharges into surface or ground water, or in any alteration of surface or ground water quality, including, but not limited to, temperature, dissolved oxygen or turbidity? Would there be increases in pollutant discharges including downstream sedimentation?**

**Issue 2: Would the Pure Water Program, when considered in combination with past, current, and future projects in the affected watersheds, result in cumulatively significant impacts on hydrology and water quality?**

Water quality is affected by sedimentation caused by erosion, by runoff carrying contaminants, and by direct discharge of pollutants (point-source pollution). Also, as land is developed, the impervious surfaces send an increased volume of runoff containing oils, heavy metals, pesticides, fertilizers, and other contaminants (non-point source pollution) into adjacent watersheds. Degradation of water quality could impact human health as well as wildlife systems. Sedimentation can cause impediments to stream flow. In addition, oxygen availability is affected by sedimentation, which can significantly influence aquatic and riparian habitats. Therefore, the PEIR should discuss how the Program could affect water quality within the project area, in discharge reservoirs, ocean outfalls, and downstream. The PEIR will address the existing conditions, potential constraints and opportunities related to water quality within the project study area.

## **GEOLOGY/SOILS**

**Issue 1: Would the Pure Water Program expose people or property to geologic hazards such as earthquakes, landslides, mudslides, liquefaction, ground failure, or similar hazards?**

**Issue 2: Would the Pure Water Program increase the potential for erosion of soils on- or off-site?**

**Issue 3: Would the Pure Water Program be located on a geological unit or soil that is unstable or that would become unstable as a result of the project, and potentially result in on-or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?**

The geologic and subsurface conditions in the proposed project area will be described in this section, along with existing topography, geology (surface and subsurface), tectonics and soil types. The constraint discussion should include issues such as the potential for liquefaction, slope instability, and rockfall hazards. Any need for blasting should also be identified, if such measures are anticipated. Any secondary issues due to soils/geology (e.g., excavation of unsuitable soils) should be addressed.

The PEIR will include a qualitative description of potential geologic hazard issues that could be encountered within the Program area. A quantified analysis based on project level geotechnical analysis would not be addressed in the PEIR. The PEIR should however provide recommendations for when future project review would be required to conduct geotechnical assessments as part of subsequent environmental review under CEQA. This could be shown in table form in the PEIR and must reference the City's Seismic Safety study (1995).

### **NOISE**

**Issue 1: Would the Pure Water Program result in or create a significant increase in the existing ambient noise level?**

**Issue 2: Would construction noise associated with implementation for any component of the Pure Water Program exceed the City's adopted noise ordinance or noise levels as established in the General Plan?**

A Noise Technical Report shall be prepared, which shall consist of a comparison of the change in noise levels projected along affected roadways (as identified in the traffic study) and in surrounding areas resulting from project implementation. This analysis and the discussion in the PEIR shall focus on areas that would be subject to potentially significant noise impacts as a result of the proposed Program and shall include discussion of potential measures that could be utilized to reduce vehicular noise levels.

The noise analysis shall also address potential construction-related impacts, including a general delineation of noise-sensitive uses located in proximity to Program components, a description of noise levels associated with typical construction activities including general quantification of typical construction activity type noise levels at interval distances (i.e., confined earthmoving equipment with a typical noise level of 90 dBA at 50 feet would result in noise levels of approximately 84 dBA at 100 feet, 78 dBA at 200 feet, 72 dBA at 400 feet, etc.)



## **PALEONTOLOGICAL RESOURCES**

### **Issue 1: Would the Pure Water Program result in the loss of significant paleontological resources?**

The Program would have facilities constructed in the following high sensitivity geologic formations: Scripps Formation, Stadium Conglomerate, Friars Formation, Baypoint, Mission Valley, San Diego, and Otay. As such, there is potential for the project to impact paleontological resources due to excavation in high resource potential areas. The PEIR should include a paleontological resources discussion that identifies the underlying soils and formations within the scope of the Program and the likelihood of the project to uncover paleontological resources during grading and excavation activities. The PEIR should identify a Mitigation Framework for implementation with subsequent projects, as well as requirements for paleontological monitoring during grading operations and specific mitigation requirements for discoveries.

## **TRANSPORTATION/CIRCULATION**

### **Issue 1: Would implementation of the Pure Water Program result in an increase in projected traffic specifically associated with project-related construction that is substantial in relation to the capacity of the existing and planned circulation system?**

### **Issue 2: Would the Pure Water Program create alterations to present circulation movements in the area including effects on existing public access points?**

The PEIR should include a traffic analysis which estimates the expected construction-related and operations-related trips that could be generated based on the Program boundaries and potential impacts on intersections, roadways, and freeways throughout the entire project area and would form the basis of the impact analysis for this section of the Draft PEIR. The analysis should focus on circulation elements on existing adjacent roadways and at public access points and parking areas based on the City of San Diego standards and determine whether additional improvements are required. The traffic analysis and PEIR should include descriptions and applicable graphics of the existing transportation/circulation conditions within the project area.

## **ENERGY**

### **Issue 1: Would the construction and operation of the Pure Water Program facilities result in the use of excessive amounts of electrical power or use excess amounts of fuel?**

Appendix F of the State CEQA Guidelines requires that potentially significant energy implications of a project shall be considered in an EIR to the extent relevant and applicable to the project. Particular emphasis on avoiding or reducing inefficient, wasteful, and

unnecessary consumption of energy should be included in this section. The PEIR section shall address the estimated energy use for the project and assess whether the project would generate a demand for energy (electricity and/or natural gas) that would exceed the planned capacity of the energy suppliers and include any water saving project features in this section. This section would be cross-referenced with the GHG Emissions discussion section of the PEIR as appropriate, shall describe any proposed measures included as part of the project directed at conserving energy and reducing energy consumption, and shall address all applicable issues described within Appendix F of the CEQA Guidelines.

### **PUBLIC SERVICES**

**Issue 1: Would the Pure Water Program result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services?**

The PEIR analysis of public facilities should determine if the Program would result in impacts to fire, police, or solid waste within the project area. The PEIR should describe the public services currently available and how they intersect or interface with proposed Program.

### **PUBLIC UTILITIES**

**Issue 1: Would the Pure Water Program result in new systems or require substantial alterations to existing utilities including solid waste disposal, the construction of which would create a physical effect on the environment? These systems include communications systems, storm water drainage and solid waste disposal.**

The Pure Water Program includes the construction of new water and wastewater facilities. This section shall discuss the existing public utilities that serve the area and how they intersect or interface within the proposed Program. The PEIR analysis of public facilities should determine if the Pure Water Program would result in impacts to solid waste facilities.

### **WATER SUPPLY**

**Issue 1: Would the Pure Water Program affect the ability of water serving agencies to provide water?**

The Pure Water Program will develop a water resource that diversifies the regional's potable water resources. The Program's affect on water agencies shall be analyzed in this section of the PEIR.

## **VI. SIGNIFICANT ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED**

This section shall describe the significant unavoidable impacts of the Program, including those significant impacts that can be mitigated but not reduced to below a level of significance.

## **VII. SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES**

In accordance with CEQA Section 15126.2(c), the PEIR must include a discussion of any significant irreversible environmental changes which would be caused by the proposed action should it be implemented. The PEIR should also address the use of nonrenewable resources associated with Program implementation. See CEQA Section 15127 for limitations on the requirements for this discussion.

## **VIII. GROWTH INDUCEMENT**

The PEIR should address the potential for growth inducement through implementation of the Program. The PEIR should discuss ways in which the Program could foster economic or population growth, or construction of additional housing either directly or indirectly. This section need not conclude that growth-inducing impacts, if any, are significant unless the project would induce substantial growth or concentration of population.

## **IX. CUMULATIVE IMPACTS**

When the Pure Water Program is considered with other past, present, and reasonably foreseeable projects in the project area, implementation could result in significant environmental changes which are individually limited but cumulatively considerable. Therefore, in accordance with Section 15130 of the CEQA Guidelines, potential cumulative impacts should be discussed in a separate section of the PEIR.

### **Issue 1: What are the cumulative impacts of the Pure Water Program in conjunction with other approved or proposed projects within the region?**

CEQA requires a discussion of cumulative impacts when they are significant. The determination of cumulative significance calls for reasonable effort to discover and disclose other related projects. The direct and indirect impacts of each related project need to be identified and looked at comprehensively. CEQA provides various alternative methods to achieve an adequate discussion of cumulative impacts (see CEQA Guidelines Section 15130 noting the repealed sections of 15064(i)(4) and 15130(a)(4)). Specific sections of the City's Significance Thresholds provide significance determination criteria for cumulative impacts under individual issue areas (e.g. biology, air quality, traffic). However, in general the following rule of thumb should apply for determining significant cumulative impacts:

1. If there are known documented existing significant impacts occurring in a community, additional increments would exacerbate the impact (e.g. an overloaded transportation system).

2. If a community plan and/or precise plan identifies cumulative impacts in the community wide EIR, individual projects which contribute significantly to the community wide impacts would be considered cumulatively significant.
3. A large scale project (usually regional in nature) for which direct impacts are mitigated by the collective number of individual impacts results in a cumulative impact.

As defined in Section 15355, a cumulative impact consists of an impact which is created as a result of the combination of the project evaluated in the Environmental Impact Report (EIR) together with other projects causing related impacts. An EIR should not discuss impacts which do not result in part from the project evaluated in the PEIR.

Section 15355 defines “cumulative impacts” as follows:

Cumulative impacts refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.

- (a) The individual effects may be changes resulting from a single project or a number of separate projects;
- (b) The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

The PEIR cumulative analysis should be based on a list of projects to determine the Project's contribution to a cumulative effect or can be evaluated using the previously certified General Plan and associated or related community plans.

#### **X. EFFECTS FOUND NOT TO BE SIGNIFICANT**

A separate section of the PEIR should include a brief discussion of issues areas that were not considered to be potentially significant, such as agricultural resources, recreation, mineral resources, hazardous materials, and population/housing. If these or other potentially significant issue area arises during detailed environmental investigation of the project, however, consultation with is recommended to determine if these other issue areas need to be addressed in the PEIR. Additionally, as supplementary information is submitted, the PEIR may need to be expanded to include additional issue areas. PUD will consult with the Planning Department to determine if subsequent issue area discussions need to be added to the PEIR. The justification for these findings shall be summarized in the PEIR.



## **XI. ALTERNATIVES**

The PEIR should analyze reasonable alternatives that can avoid or substantially reduce the Pure Water Program's significant environmental impacts. These alternatives should be identified and discussed in detail, and should address all significant impacts associated with the Program. The alternative's analysis should be conducted in sufficient graphic and narrative detail to clearly assess the relative level of impacts and feasibility. Preceding the detailed alternatives analysis should be a section entitled "Alternatives Considered but Rejected." This section should include a discussion of preliminary alternatives that were considered but not analyzed in detail. The reason for rejection should also be explained. At a minimum, the following alternatives shall be considered:

### **A. The No Project Alternative**

The No Project Alternative should discuss the existing conditions of the project area at the time the Notice of Preparation is published, as well as what would be reasonably expected to occur in the foreseeable future if the Pure Water Program was not approved. This alternative should compare the environmental effects of the existing treatment facilities remaining in their existing state (or in what would reasonably be expected to occur) against environmental effects that would occur if the Program were approved. Should the No Project Alternative prove to be the environmentally superior alternative, then pursuant to Section 15126.6(e)(2) of the CEQA Guidelines, the PEIR shall also identify an environmentally superior alternative among the other alternatives.

### **B. Alternate Pipeline Alignments and Facility Siting Alternative**

The Alternate Pipeline Alignments and Facility Siting Alternative should analyze implementing a Program with similar, but varied, pipeline alignments and potential treatment plant locations than what is described in the proposed Project. This alternative would analyze alternate pipeline alignments and treatment plant locations that may result in levels of impact different from those of the proposed Project relative to most, if not all, of the environmental issue areas described above in Section 5, which ostensibly could avoid or substantially reduce significant impacts depending on the impacts of the proposed Project.

### **C. Direct Potable Reuse Project Alternative**

The Direct Potable Reuse Project Alternative should analyze implementing a Program that includes advanced water treatment but eliminates the reservoir augmentation at San Vicente Reservoir and reduces pipelines necessary to convey water. This alternative would eliminate miles of pipelines, reduce the number of pump stations, and eliminate the discharge of water into San Vicente Reservoir. This alternative will consider the impacts of implementing direct potable reuse which may reduce significant impacts for the same issue areas as analyzed for the Project at a programmatic level.

If through the environmental analysis process, other alternatives become apparent that would mitigate potentially significant impacts such alternatives must be reviewed and discussed with environmental staff prior to including them in the PEIR. It is important to emphasize that the alternatives section of the PEIR should constitute a major part of the document. The timely processing of the environmental review will likely be dependent on the thoroughness of effort exhibited in the alternatives analysis.

## **XII. MITIGATION FRAMEWORK - MITIGATION, MONITORING, AND REPORTING PROGRAM (MMRP)**

A Mitigation Framework should be developed which clearly identifies the requirements for review of subsequent projects implemented in accordance with the Pure Water Program. The PEIR should describe the significant impact(s) addressed by each measure and the anticipated effectiveness and outcome of the measure as addressed in the PEIR. The Mitigation Framework will be the basis for which future projects implemented in accordance with the Program are evaluated or designed to assure compliance with goals, objective and policies contained within the planning documents to be amended. At a minimum, the Mitigation Framework should identify for each mitigation measure: 1) the City department or other entity responsible for implementing the program or monitoring its affects; 2) the monitoring and reporting schedule, and 3) the completion requirements. The MMRP shall be presented as a separate chapter at the back of the PEIR. Formatting of this section will be developed in consultation with the Planning environmental analyst.

## **XIII. OTHER**

The PEIR shall include sections for references, individuals and agencies consulted, as well as a certification page. Appendices shall be included in the Table of Contents, but are bound under separate cover and/or will be included on a CD attached to the back page of the DEIR. In addition, other specific direction regarding formatting, content and processing of the DEIR will be provided by environmental staff prior to submittal of the first screencheck DEIR for internal staff review.



Edmund G. Brown Jr.  
Governor

STATE OF CALIFORNIA  
Governor's Office of Planning and Research  
State Clearinghouse and Planning Unit



Ken Alex  
Director

**Notice of Preparation**

November 25, 2014

To: Reviewing Agencies

Re: Pure Water Program  
SCH# 2014111068

Attached for your review and comment is the Notice of Preparation (NOP) for the Pure Water Program draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

**Myra Herrmann**  
City of San Diego  
1222 First Avenue, MS-501  
San Diego, CA 92101

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan  
Director, State Clearinghouse

Attachments  
cc: Lead Agency

**Document Details Report  
State Clearinghouse Data Base**

**SCH#** 2014111068  
**Project Title** Pure Water Program  
**Lead Agency** San Diego, City of

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**Type** NOP Notice of Preparation  
**Description** The Pure Water San Diego Program (Pure Water Program) is the City of San Diego Public Utilities Department (PUD) proposed program to provide a safe, secure, and sustainable local drinking water supply for San Diego. Advanced water purification technology will be used to produce potable water from recycled water. The Pure Water Program consists of the design and construction of new advanced water treatment facilities, wastewater treatment facilities, pump stations, transmission lines, and pipelines.

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**Lead Agency Contact**

<b>Name</b>	Myra Herrmann		
<b>Agency</b>	City of San Diego		
<b>Phone</b>	(619) 446-5375	<b>Fax</b>	
<b>email</b>			
<b>Address</b>	1222 First Avenue, MS-501		
<b>City</b>	San Diego	<b>State</b> CA	<b>Zip</b> 92101

---

**Project Location**

<b>County</b>	San Diego		
<b>City</b>			
<b>Region</b>			
<b>Cross Streets</b>	Citywide		
<b>Lat / Long</b>			
<b>Parcel No.</b>			
<b>Township</b>	<b>Range</b>	<b>Section</b>	<b>Base</b>

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**Proximity to:**

<b>Highways</b>	I-5, I-15, I-805, SR-52, SR-94
<b>Airports</b>	Lindbergh Field, Miramar
<b>Railways</b>	San Diego Trolley
<b>Waterways</b>	Pacific Ocean, San Diego Bay, Mission Bay, San Diego River, Lake Murray, San Vicente Reservoir,
<b>Schools</b>	Multiple
<b>Land Use</b>	Various Land uses, Z & GP D: Intersect with the program elements.

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**Project Issues** Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Noise; Public Services; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife; Growth Inducing; Landuse; Cumulative Effects; Geologic/Seismic

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**Reviewing Agencies** Resources Agency; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Wildlife, Region 5; Native American Heritage Commission; State Lands Commission; California Highway Patrol; Caltrans, District 11; Air Resources Board; State Water Resources Control Board, Division of Financial Assistance; State Water Resources Control Board, Division of Drinking Water; Regional Water Quality Control Board, Region 9; Other Agency(ies); Department of Boating and Waterways; Department of Fish and Wildlife, Marine Region; San Diego River Conservancy

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<b>Date Received</b>	11/25/2014	<b>Start of Review</b>	11/25/2014	<b>End of Review</b>	12/24/2014
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# NOP Distribution List

W

County:

San Diego

SCH#

2014111068

## Resources Agency

Resources Agency  
Nadell Gayou

☐ Fish & Wildlife Region 1E  
Laurie Harnsberger

☐ Fish & Wildlife Region 2  
Jeff Drongesen

☐ Fish & Wildlife Region 3  
Charles Armor

☐ Fish & Wildlife Region 4  
Julie Vance

☒ Fish & Wildlife Region 5  
Leslie Newton-Reed  
Habitat Conservation  
Program

☐ Fish & Wildlife Region 6  
Tiffany Ellis  
Habitat Conservation  
Program

☐ Fish & Wildlife Region 6 I/M  
Heidi Sickler  
Inyo/Mono, Habitat  
Conservation Program

☐ Dept. of Fish & Wildlife M  
George Isaac  
Marine Region

## Other Departments

☐ Food & Agriculture  
Sandra Schubert  
Dept. of Food and  
Agriculture

☐ Depart. of General  
Services  
Public School Construction

☐ Dept. of General Services  
Anna Garbeff  
Environmental Services  
Section

☐ Delta Stewardship  
Council  
Kevan Samsam

☐ Housing & Comm. Dev.  
CEQA Coordinator  
Housing Policy Division

## Independent Commissions, Boards

☐ Delta Protection Commission  
Michael Machado

☐ OES (Office of Emergency  
Services)  
Dennis Castrillo

☒ Native American Heritage  
Comm.  
Debbie Treadway

☐ Public Utilities  
Commission  
Leo Wong

☐ Santa Monica Bay  
Restoration  
Guangyu Wang

☒ State Lands Commission  
Jennifer Deleong

☐ Tahoe Regional Planning  
Agency (TRPA)  
Cherry Jacques

## Cal State Transportation Agency CalSTA

☐ Caltrans - Division of  
Aeronautics  
Philip Crimmins

☐ Caltrans - Planning  
HQ LD-IGR  
Terri Pencovic

☒ California Highway Patrol  
Suzann Ikeuchi  
Office of Special Projects

## Dept. of Transportation

☐ Caltrans, District 1  
Rex Jackman

☐ Caltrans, District 2  
Marcelino Gonzalez

☐ Caltrans, District 3  
Eric Federicks - South  
Susan Zanchi - North

☐ Caltrans, District 4  
Erik Alm

☐ Caltrans, District 5  
Larry Newland

☐ Caltrans, District 6  
Michael Navarro

☐ Caltrans, District 7  
Dianna Watson

☐ Caltrans, District 8  
Mark Roberts

☐ Caltrans, District 9  
Gayle Rosander

☐ Caltrans, District 10  
Tom Dumas

☒ Caltrans, District 11  
Jacob Armstrong

☐ Caltrans, District 12  
Maureen El Harake

## Cal EPA

### Air Resources Board

☒ All Other Projects  
Cathi Slaminski

☐ Transportation Projects  
Nesamani Kalandiyur

☐ Industrial/Energy Projects  
Mike Tollstrup

☒ State Water Resources Control  
Board  
Regional Programs Unit  
Division of Financial Assistance

☒ State Water Resources Control  
Board  
Jeffery Werth  
Division of Drinking Water

☐ State Water Resources Control  
Board  
Student Intern, 401 Water Quality  
Certification Unit  
Division of Water Quality

☐ State Water Resources Control  
Board  
Phil Crader  
Division of Water Rights

☐ Dept. of Toxic Substances  
Control  
CEQA Tracking Center

☐ Department of Pesticide  
Regulation  
CEQA Coordinator

## Regional Water Quality Control Board (RWQCB)

☐ RWQCB 1  
Cathleen Hudson  
North Coast Region (1)

☐ RWQCB 2  
Environmental Document  
Coordinator  
San Francisco Bay Region (2)

☐ RWQCB 3  
Central Coast Region (3)

☐ RWQCB 4  
Teresa Rodgers  
Los Angeles Region (4)

☐ RWQCB 5S  
Central Valley Region (5)

☐ RWQCB 5F  
Central Valley Region (5)  
Fresno Branch Office

☐ RWQCB 5R  
Central Valley Region (5)  
Redding Branch Office

☐ RWQCB 6  
Lahontan Region (6)

☐ RWQCB 6V  
Lahontan Region (6)  
Victorville Branch Office

☐ RWQCB 7  
Colorado River Basin Region (7)

☐ RWQCB 8  
Santa Ana Region (8)

☒ RWQCB 9  
San Diego Region (9)

☒ Other DFG MARINE  
REGION

☒ SAN DIEGO RIVER  
Conservancy

☒ Dept of Parks & Recreation  
Environmental Stewardship  
Section

☐ California Department of  
Resources, Recycling &  
Recovery  
Sue O'Leary

☐ S.F. Bay Conservation &  
Dev't. Comm.  
Steve McAdam

☒ Dept. of Water  
Resources  
Resources Agency  
Nadell Gayou

## Fish and Game

☐ Depart. of Fish & Wildlife  
Scott Flint  
Environmental Services  
Division

☐ Fish & Wildlife Region 1  
Donald Koch



U. S. Fish and Wildlife Service  
Carlsbad Fish and Wildlife Office  
2177 Salk Avenue  
Carlsbad, California 92008  
(760) 431-9440  
FAX (760) 431-5902



California Department of Fish and Wildlife  
South Coast Region  
3883 Ruffin Road  
San Diego, California 92123  
(858) 467-4201  
FAX (858) 467-4239

In Reply Refer To:  
FWS/CDFW-SDG-15B0078-15TA0108

DEC 23 2014

Ms. Myra Herrmann  
Senior Environmental Planner  
City of San Diego  
Development Services Department  
1222 First Avenue, MS-501  
San Diego, California 92101

Subject: Comments on the Notice of Preparation of a Program Environmental Impact Report for the Pure Water Program (Project Number 386038; SCH No. 2014111068)

Dear Ms. Herrmann:

The U.S Fish and Wildlife Service (Service) and the California Department of Fish and Wildlife (Department), collectively referred to as the Wildlife Agencies, have reviewed the above-referenced Notice of Preparation (NOP) of a Program Environmental Impact Report (PEIR) for the Pure Water Program dated November 24, 2014. The Wildlife Agencies have identified potential effects of this project on wildlife and sensitive habitats. The project details provided herein are based on the information provided in the NOP and our knowledge of sensitive and declining vegetation communities in the region, and our participation in the Multiple Species Conservation Program (MSCP) and the City's MSCP Subarea Plan (SAP).

The primary concern and mandate of the Service is the protection of public fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Federal Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*), including habitat conservation plans (HCP) developed under section 10(a)(1)(B) of the Act. The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA; §§ 15386 and 15381, respectively) and is responsible for ensuring appropriate conservation of the state's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act (CESA) and other sections of the Fish and Game Code. The Department also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program. The City of San Diego (City) participates in the NCCP and the Service's HCP programs by implementing its SAP.

According to the NOP, the Pure Water Program consists of the design and construction of three advanced water treatment facilities, wastewater treatment facilities, pump stations, transmission lines, and pipelines (extending for a period of 20 years). The Pure Water Program is regional in scale and categorized by three components (i.e., North City Area, Central Area, and South Bay Area). The Pure Water Program would include property and easement acquisition, discretionary

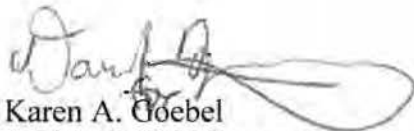


permitting, financing, facility setup, testing, operation and maintenance of new facilities, and significant public education and community engagement. Currently, two water reclamation facilities exist at the North City and South Bay locations where new advanced water purification facilities would be constructed on vacant City-owned land, adjacent to each existing plant. The treatment facility for the Central Area component would include two alternative site proposals (i.e., Harbor Drive treatment facility near Lindbergh Field or a treatment facility constructed on City-owned property in Mission Valley). The NOP identifies that the PEIR is not intended or structured to evaluate project level impacts associated with future implementation of any of the treatment facilities or pipelines, although the PEIR may provide information and analyses that could be used in conjunction with future project-level environmental reviews of such improvements.

We offer the enclosed comments and recommendations to assist the City in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources, and to ensure that the project is consistent with the City's SAP. In summary, our comments address the following issues: (1) project conformance with existing NCCPs/HCPs; (2) compliance with CEQA; (3) potential impacts to vernal pool habitat and wetland/riparian habitats; (4) updated protocol-level species surveys for listed species with potential to occur in the project area; (5) potential impacts to burrowing owl and associated habitat; (6) application of best management practices; (7) use of native plants in landscaped areas adjacent to native habitats; and (8) information to be included in the PEIR.

We appreciate the opportunity to comment on this NOP. We are hopeful that further consultation among our agencies will ensure the protection we find necessary for the biological resources that would be affected by this project. If you have questions or comments regarding this letter, please contact Patrick Gower of the Service (760) 431-9440 or Paul Schlitt of the Department at (858) 637-5510.

Sincerely,



Karen A. Goebel  
Assistant Field Supervisor  
U.S. Fish and Wildlife Service  
Enclosure



Gail K. Sevens  
Environmental Program Manager  
California Department of Fish and Wildlife

cc: State Clearinghouse, Sacramento  
Eric Lardy, County of San Diego, Planning and Development Services  
Glen Laube, City of Chula Vista, Development Services Department

**Enclosure**  
**Wildlife Agency Comments and Recommendations on the**  
**Notice of Preparation (NOP) of a**  
**Program Environmental Impact Report (PEIR) for the**  
**Pure Water Program**

**Specific Comments**

1. The PEIR should accurately disclose the relationship of the Pure Water Program to the City's SAP and the general planning policies and design guidelines (i.e., manner consistent with Section 1.4.2 of the City's SAP) that are required to be considered and to adhere to minimizing impacts to the maximum extent practicable. The direct, indirect and cumulative impact analysis should include figures of the designated MSCP preserve areas that exist within and adjacent to the entirety of the project boundaries, as well as address the current status and long-term management obligations associated with these areas and any potential impacts to these areas that may result from the proposed project.
2. Segments of the purified water pipelines extend into key locations associated with the County of San Diego's and City of Chula Vista's MSCP SAPs. If the analysis from this document is intended to be used to satisfy future County of San Diego or City of Chula Vista permit requirements, the Pure Water Program must analyze compliance with each jurisdictions respective environmental-related ordinances; for example, the County of San Diego's Biological Mitigation Ordinance, Resource Protection Ordinance, MSCP SAP or the City of Chula Vista's Habitat Loss and Incidental Take Ordinance and MSCP SAP.
3. The Department emphasizes that one of the purposes of CEQA is to "prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible" (CEQA Guideline, §15002 (a)(3)). Because of the proximity of the project site to biological open space and associated sensitive species (e.g., vernal pools) and habitats that could be negatively affected or lost by the proposed project, the CEQA alternatives analysis for this project is extremely important. We are particularly interested in the PEIR describing a "range of reasonable alternatives to the project (particularly options to maximize open space), which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives," as required by Section 15126.6(a) of the CEQA Guidelines. The discussion of alternatives are to include an "alternative [that] would impede to some degree the attainment of the project objectives, or would be more costly" (§15126.6[b] of the CEQA Guidelines). "The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making" (§15126.6[f] of the CEQA Guidelines). The Department will consider the alternatives analyzed in the context of their relative impacts on biological resources on both a local and regional level.
4. According to the conceptual locations of new facilities and pipelines (per Figure 1: Pure Water San Diego Program), the expansion of the North City Water Reclamation Plant into the adjoining parcel and portions of the South Bay component extend though habitat communities that have the potential to support vernal pools. Project activities that alter hydrology, increase vernal pool habitat fragmentation, or decrease land types suitable for

vernal pool formation have the potential to limit the survivability and recovery of federally listed vernal pool species such as the San Diego fairy shrimp (*Branchinecta sandiegonensis*), Riverside fairy shrimp (*Streptocephalus woottoni*), San Diego mesa mint (*Pogogyne abramsii*), San Diego button celery (*Eryngium aristulatum* var. *parishii*), and Orcutt's brodiaea (*Brodiaea orcuttii*). To guide project planning and avoid/minimize impacts, we recommend that protocol surveys be conducted for any listed vernal pool species with the potential to occur within the project site. Also, the PEIR should provide a specific discussion on the conformance of the Pure Water Program with the City's draft Vernal Pool HCP.

5. The Wildlife Agencies have responsibility for the conservation of wetland and riparian habitats. It is the policy of the Wildlife Agencies to strongly discourage development in wetlands or conversion of wetlands to uplands. We oppose any development or conversion which would result in a reduction of wetland acreage or wetland habitat values, unless, at a minimum, project mitigation assures there will be "no net loss" of either wetland habitat values or acreage. Development and conversion include but are not limited to conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent or perennial, should be retained and provided with substantial setbacks to preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife and plant populations. Mitigation measures to compensate for impacts to mature riparian corridors should be included in the PEIR and must compensate for the loss of function and value as a wildlife corridor.
  - a) The project area supports aquatic, riparian, and wetland habitats; therefore, the PEIR should include a jurisdictional delineation of the creeks/drainages and their associated riparian habitats. The delineation should be conducted pursuant to the Service wetland definition adopted by the Department.<sup>1</sup> Please note that some wetland and riparian habitats subject to the Department's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers.
  - b) The Department also has regulatory authority with regard to activities occurring in streams and/or lakes that could adversely affect any fish or wildlife resource. For any activity that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream, or use material from a streambed, the project applicant (or "entity") must provide written notification to the Department pursuant to section 1600 *et seq.* of the Fish and Game Code. Based on this notification and other information, the Department then determines whether a Lake and Streambed Alteration (LSA) Agreement is required. The Department's issuance of a LSA for a project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. As a Responsible Agency under CEQA, the Department may consider the lead agency's CEQA documentation for the project. To minimize additional requirements by the Department pursuant to section 1600 *et seq.* and/or under CEQA, the document should fully identify the potential impacts to the

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<sup>1</sup> Cowardin, Lewis M., et al. 1979. Classification of Wetlands and Deepwater Habitats of the United States. U.S. Department of the Interior, Fish and Wildlife Service.



stream or riparian resources and provide adequate avoidance, mitigation, monitoring, and reporting commitments for issuance of an SAA.<sup>2</sup>

6. For those portions of the project area that have the potential to support the federally-listed Quino checkerspot butterfly (*Euphydryas editha quino*; Quino), the Wildlife Agencies recommend the City survey for Quino consistent with the Service's 2014 Quino Checkerspot Survey Guidelines.
7. To guide project planning to avoid/minimize impacts to listed species, such as the coastal California gnatcatcher (*Polioptila californica californica*) and least Bell's vireo (*Vireo bellii pusillus*), we recommend that protocol-level surveys be conducted for any listed species with the potential to occur within the project site. Surveys should be performed no more than one year prior to an application for a permit from the Wildlife Agencies, and the PEIR should include the survey results.
8. According to the purified water pipeline route alignment (per Figure 1: Pure Water San Diego Program), portions of the South Bay component extend through areas known to support burrowing owl (*Athene cunicularia*; State Species of Special Concern). The Wildlife Agencies are concerned with the status of the burrowing owl due to the cumulative loss of grassland habitat and associated reduction in resident/breeding and wintering habitat for burrowing owls on Otay Mesa and elsewhere. Otay Mesa is one of the few remaining areas in San Diego County where a breeding burrowing owl population remains. The burrowing owl is a covered species for each respective MSCP SAP (i.e., City of San Diego, City of Chula Vista, and County of San Diego). We recommend that burrowing owl survey protocol and best management practices follow the survey and mitigation guidance for portions of the project that occur within the given jurisdiction's SAP. As an MSCP condition of coverage, any impacted individuals must be relocated out of the impact area using passive or active methodologies approved by the Wildlife Agencies. Mitigation for impacts to occupied habitat (at the SAP specified ratio) must be met through the conservation of occupied burrowing owl habitat or conservation of lands appropriate for restoration, management and enhancement of burrowing owl nesting and foraging requirements. We recommend upon the result of forthcoming surveys that the project applicant and the City meet with the Wildlife Agencies (prior to subsequent CEQA review) to developing an acceptable and effective burrowing owl mitigation plan.
9. All construction and post-construction best management practices (BMPs) should be located within the development footprint (i.e., included in the impact analysis as loss of habitat). The PEIR should include a figure depicting the location of BMPs in relation the development footprint.
10. Native plants should be used to the greatest extent feasible in landscaped areas adjacent to and/or near mitigation/open space areas and/or wetland/riparian areas. The applicant should not plant, seed, or otherwise introduce invasive exotic plant species to landscaped areas adjacent to and/or near native habitat areas. Exotic plant species not to be used include those species listed on the California Invasive Plant Council's (Cal-IPC) Invasive Plant Inventory.

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<sup>2</sup> A notification package for a SAA may be obtained by accessing the Department's web site at [www.wildlife.ca.gov/habcon/1600](http://www.wildlife.ca.gov/habcon/1600).

This list includes such species as: pepper trees, pampas grass, fountain grass, ice plant, myoporum, black locust, capeweed, tree of heaven, periwinkle, sweet alyssum, English ivy, French broom, Scotch broom, and Spanish broom.<sup>1</sup> In addition, landscaping adjacent to native habitat areas should not use plants that require intensive irrigation, fertilizers, or pesticides. Water runoff from landscaped areas should be directed away from mitigation/open space and/or wetland/riparian areas and contained and/or treated within the development footprint.

### General Comments

To enable the Wildlife Agencies to adequately review and comment on the proposed project from the standpoint of the protection of plants, fish, wildlife, and other biological resources, we recommend the following information be included in the DPEIR.

1. A complete discussion of the purpose and need for, and description of, the proposed project, including all staging areas and access routes to the construction and staging areas.
2. A range of feasible alternatives to ensure that alternatives to the proposed project are fully considered and evaluated; the analyses should avoid or otherwise minimize impacts to sensitive biological resources, particularly wetlands. Specific alternative locations should be evaluated in areas with lower resource sensitivity, where appropriate.
3. To provide a complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying state and federally listed endangered, threatened, rare, or proposed candidate species, California Species of Special Concern and/or Protected or Fully Protected species, and locally unique species and sensitive habitats, the PEIR should include the following information:
  - a) Per CEQA Guidelines, section 15125(c), information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region that would be affected by the project.
  - b) A thorough, recent floristic-based assessment of special status plants and natural communities, following the Department's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see <http://www.dfg.ca.gov/habcon/plant/>). The Department recommends that floristic, alliance- and/or association-based mapping and vegetation impact assessments be conducted at the Project site and neighboring vicinity. The Manual of California Vegetation, second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2008<sup>2</sup>). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions. We also recommend that the PEIR include a table to compare floristic, alliance- and/or association-based mapping with vegetation mapping used under the MSCP.

<sup>1</sup> A copy of the complete list can be obtained by contacting the California Invasive Plant Council at 1442-A Walnut Street, Suite #462, Berkeley, California 94709, or by accessing their web site at <http://www.cal-ipc.org>.

<sup>2</sup> Sawyer, J. O., T. Keeler-Wolf and J.M. Evens. 2009. A Manual of California Vegetation, Second Edition. California Native Plant Society Press, Sacramento.

- c) A current inventory of the biological resources associated with each habitat type on site and within the area of potential effect. The Department's California Natural Diversity Data Base in Sacramento should be contacted at [www.wildlife.ca.gov/biogeodata/](http://www.wildlife.ca.gov/biogeodata/) to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.
  - d) An inventory of rare, threatened, endangered and other sensitive species on site and within the area of potential effect. Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines, § 15380). This should include sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Wildlife Agencies.
4. To provide a thorough discussion of direct, indirect, and cumulative project-related impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the PEIR.
- a) A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage should also be included. The latter subject should address: project-related changes on drainage patterns on and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site. The discussions should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary, and the potential resulting impacts on the habitat, if any, supported by the groundwater. Mitigation measures proposed to alleviate such impacts should be included.
  - b) Discussions regarding indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DPEIR.
  - c) A cumulative effects analysis should be developed as described under CEQA Guidelines, section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.
  - d) Discussions regarding possible conflicts resulting from wildlife-human interactions at the interface between the development project and natural habitats. The zoning of areas for development projects or other uses that are nearby or adjacent to natural areas may inadvertently contribute to wildlife-human interactions.
  - e) If applicable, an analysis of the effect that the project may have on implementation of regional and/or subregional conservation programs. We recommend that the Lead Agency ensure that the development of this and other proposed projects do not preclude long-term



preserve planning options and that projects conform with other requirements of the NCCP program. Jurisdictions participating in the NCCP program should assess specific projects for consistency with the NCCP Conservation Guidelines. Additionally, the jurisdictions should quantify and qualify: 1) the amount of coastal sage scrub within their boundaries; 2) the acreage of coastal sage scrub habitat removed by individual projects; and 3) any acreage set aside for mitigation. This information should be kept in an updated ledger system.

5. The PEIR should include measures for adverse project-related impacts on sensitive plants, animals, and habitats. Specifically, the PEIR should include/address:
  - a) Measures to fully avoid and otherwise protect Rare Natural Communities from project-related impacts. The Wildlife Agencies consider these communities as threatened habitats having both regional and local significance.
  - b) Mitigation measures should emphasize avoidance. Where avoidance is infeasible, mitigation measures that emphasize minimization of project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable (e.g., it would not adequately mitigate the loss of biological functions and values), off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. The Wildlife Agencies generally do not encourage the use of relocation, salvage, and/or transplantation as mitigation for impacts on rare, threatened, or endangered species. Studies have shown these efforts are experimental in nature and do not provide for the long-term viability of the target species.
  - c) Mitigation measures to alleviate indirect project-related impacts on biological resources, including measures to minimize changes in the hydrologic regimes on site, and means to convey runoff without damaging biological resources, including the morphology of on-site and downstream habitats.
  - d) Where proposed grading or clearing is within 100 feet of proposed biological open space, or otherwise preserved sensitive habitats, a requirement for temporary fencing. Fencing should be placed on the impact side and should result in no vegetation loss within open space. All temporary fencing should be removed only after the conclusion of all grading, clearing, and construction activities.
  - e) A requirement that a Wildlife Agency-approved biological monitor to be present during initial clearing, grading, and construction in sensitive habitat areas and/or in the vicinity of biological open space areas to ensure that conservation measures associated with resource agency permits and construction documents are performed. The biological monitor should have the authority to halt construction to prevent or avoid take of any listed species and/or to ensure compliance with all avoidance, minimization, and mitigation measures. Any unauthorized impacts or actions not in compliance with the permits and construction documents should be immediately brought to the attention of the Lead Agency and the Wildlife Agencies.

- f) Plans for restoration and revegetation, to be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria (e.g., percent cover of native and non-native species; species richness); (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.
- g) Measures to protect, in perpetuity, the targeted habitat values of proposed preservation and/or restoration areas from direct and indirect negative impacts. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Permanent fencing should be installed between the impact area and biological open space and be designed to minimize intrusion into the sensitive habitats from humans and domestic animals, particularly cats. There should be no gates that would allow access between the development and biological open space. Additional issues that should be addressed include proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, etc.
- h) Development and implementation of a management and monitoring plan (MMP), including a funding commitment, for any on- and/or off-site preservation and/or restoration areas, if applicable. An appropriate natural lands management organization, subject to approval by the Wildlife Agencies, should be identified. The MMP should outline biological resources on the site, provide for monitoring of biological resources, address potential impacts to biological resources, and identify actions to be taken to eliminate or minimize those impacts. A Property Analysis Record (PAR), or PAR-equivalent analysis, should be completed to determine the amount of funding needed for the perpetual management, maintenance, and monitoring of the biological conservation easement areas by the natural lands management organization. It should be demonstrated that the proposed funding mechanism would ensure that adequate funds would be available on an annual basis to implement the MMP. The natural lands management organization should submit a draft MMP, PAR results, and proposed funding mechanism to the Wildlife Agencies for review and approval prior to initiating construction activities; the final plan should be submitted to the Wildlife Agencies and the funds for implementing the MMP transferred within 90 days of receiving approval of the draft plan.
- i) The Department recommends that measures be taken to avoid project impacts to nesting birds. Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season which generally runs from February 1-September 1 (as early as January 1 for some raptors) to avoid take of birds or their eggs.

If avoidance of the avian breeding season is not feasible, the Department recommends surveys by a qualified biologist with experience in conducting breeding bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. Reductions in the nest buffer distance may be appropriate depending on the avian species involved, ambient levels of human activity, screening vegetation, or possibly other factors.

## NATIVE AMERICAN HERITAGE COMMISSION

1550 Harbor Blvd., ROOM 100  
West SACRAMENTO, CA 95691  
(916) 373-3710  
Fax (916) 373-5471



December 3, 2014

Myra Herrmann  
City of San Diego  
1222 First Avenue, MS-501  
San Diego, CA 92101

RE: SCH# 2014111068 Pure Water Program, San Diego County.

Dear Ms. Herrmann,

The Native American Heritage Commission (NAHC) has reviewed the Notice of Preparation (NOP) referenced above. The California Environmental Quality Act (CEQA) states that any project that causes a substantial adverse change in the significance of an historical resource, which includes archeological resources, is a significant effect requiring the preparation of an EIR (CEQA Guidelines 15064(b)). To comply with this provision the lead agency is required to assess whether the project will have an adverse impact on historical resources within the area of project effect (APE), and if so to mitigate that effect. To adequately assess and mitigate project-related impacts to archaeological resources, the NAHC recommends the following actions:

- ✓ Contact the appropriate regional archaeological Information Center for a record search. The record search will determine:
  - If a part or all of the area of project effect (APE) has been previously surveyed for cultural resources.
  - If any known cultural resources have already been recorded on or adjacent to the APE.
  - If the probability is low, moderate, or high that cultural resources are located in the APE.
  - If a survey is required to determine whether previously unrecorded cultural resources are present.
- ✓ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
  - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
  - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.
- ✓ Contact the Native American Heritage Commission for:
  - A Sacred Lands File Check. **USGS 7.5-minute quadrangle name, township, range, and section required**
  - A list of appropriate Native American contacts for consultation concerning the project site and to assist in the mitigation measures. **Native American Contacts List attached**
- ✓ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
  - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) Guidelines §15064.5(f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
  - Lead agencies should include in their mitigation plan provisions for the disposition of recovered cultural items that are not burial associated, which are addressed in Public Resources Code (PRC) §5097.98, in consultation with culturally affiliated Native Americans.
  - Lead agencies should include provisions for discovery of Native American human remains in their mitigation plan. Health and Safety Code §7050.5, PRC §5097.98, and CEQA Guidelines §15064.5(e), address the process to be followed in the event of an accidental discovery of any human remains and associated grave goods in a location other than a dedicated cemetery.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gayle Totton".

Gayle Totton  
Associate Government Program Analyst

CC: State Clearinghouse

**Native American Tribal Government Consultation List  
San Diego County  
December 3, 2014**

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**This list is current only as of the date of this document.**

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is applicable only for consultation with Native American tribes under Government Code Section 65352.3 and 65362.4, et seq.



**Native American Tribal Government Consultation List  
San Diego County  
December 3, 2014**

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December 3, 2014**

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**Native American Tribal Government Consultation List  
San Diego County  
December 3, 2014**

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EDMUND G. BROWN JR.  
GOVERNOR



MATTHEW RODRIGUEZ  
SECRETARY FOR  
ENVIRONMENTAL PROTECTION

## State Water Resources Control Board

DEC 10 2014

Myra Herrmann  
City of San Diego  
1222 First Avenue, MS-501  
San Diego, CA 92101

Dear Ms. Herrmann:

NOTICE OF PREPARATION (NOP) FOR CITY OF SAN DIEGO (CITY); PURE WATER PROGRAM (PROJECT); SAN DIEGO COUNTY; STATE CLEARINGHOUSE NO.2014111068

We understand that the City may be pursuing Clean Water State Revolving Fund (CWSRF) financing for this Project. As a funding agency and a state agency with jurisdiction by law to preserve, enhance, and restore the quality of California's water resources, the State Water Resources Control Board (State Water Board) is providing the following information on the preparation of the California Environmental Quality Act (CEQA) for the Project.

The State Water Board, Division of Financial Assistance, is responsible for administering the CWSRF Program. The primary purpose for the CWSRF Program is to implement the Clean Water Act and various state laws by providing financial assistance for wastewater treatment facilities necessary to prevent water pollution, recycle water, correct nonpoint source and storm drainage pollution problems, provide for estuary enhancement, and thereby protect and promote health, safety and welfare of the inhabitants of the state. The CWSRF Program provides low-interest funding equal to one-half of the most recent State General Obligation Bond Rates with a 30-year term. Applications are accepted and processed continuously. Please refer to the State Water Board's CWSRF website at:

[www.waterboards.ca.gov/water\\_issues/programs/grants\\_loans/srf/index.shtml](http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/index.shtml).

The CWSRF Program is partially funded by the United States Environmental Protection Agency and requires additional "CEQA-Plus" environmental documentation and review. Three enclosures are included that further explain the CWSRF Program environmental review process and the additional federal requirements. For the complete environmental application package please visit:

[http://www.waterboards.ca.gov/water\\_issues/programs/grants\\_loans/srf/srf\\_forms.shtml](http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/srf_forms.shtml). The State Water Board is required to consult directly with agencies responsible for implementing federal environmental laws and regulations. Any environmental issues raised by federal agencies or their representatives will need to be resolved prior to State Water Board approval of a CWSRF financing commitment for the proposed Project. For further information on the CWSRF Program, please contact Mr. Ahmad Kashkoli, at (916) 341-5855.

FELICIA MARCUS, CHAIR | THOMAS HOWARD, EXECUTIVE DIRECTOR

1001 J Street, Sacramento, CA 95814 | Mailing Address: P.O. Box 100, Sacramento, Ca 95812-0100 | [www.waterboards.ca.gov](http://www.waterboards.ca.gov)



It is important to note that prior to a CWSRF financing commitment, projects are subject to provisions of the Federal Endangered Species Act (ESA), and must obtain Section 7 clearance from the United States Department of the Interior, Fish and Wildlife Service (USFWS), and/or the United States Department of Commerce National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NMFS) for any potential effects to special-status species.

Please be advised that the State Water Board will consult with the USFWS, and/or the NMFS regarding all federal special-status species that the Project has the potential to impact if the Project is to be financed by the CWSRF Program. The City will need to identify whether the Project will involve any direct effects from construction activities, or indirect effects such as growth inducement, that may affect federally listed threatened, endangered, or candidate species that are known, or have a potential to occur in the Project site, in the surrounding areas, or in the service area, and to identify applicable conservation measures to reduce such effects.

In addition, CWSRF projects must comply with federal laws pertaining to cultural resources, specifically Section 106 of the National Historic Preservation Act (Section 106). The State Water Board has responsibility for ensuring compliance with Section 106 and the State Water Board must consult directly with the California State Historic Preservation Officer (SHPO). SHPO consultation is initiated when sufficient information is provided by the CWSRF applicant. The City must retain a consultant that meets the Secretary of the Interior's Professional Qualifications Standards ([http://www.nps.gov/history/local-law/arch\\_stnds\\_9.htm](http://www.nps.gov/history/local-law/arch_stnds_9.htm)) to prepare a Section 106 compliance report.

Note that the City will need to identify the Area of Potential Effects (APE), including construction and staging areas, and the depth of any excavation. The APE is three-dimensional and includes all areas that may be affected by the Project. The APE includes the surface area and extends below ground to the depth of any Project excavations. The records search request should extend to a ½-mile beyond project APE. The appropriate area varies for different projects but should be drawn large enough to provide information on what types of sites may exist in the vicinity.

Other federal environmental requirements pertinent to the Project under the CWSRF Program include the following (for a complete list of all environmental requirements please visit: [http://www.waterboards.ca.gov/water\\_issues/programs/grants\\_loans/srf/docs/forms/application\\_environmental\\_package.pdf](http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/docs/forms/application_environmental_package.pdf)):

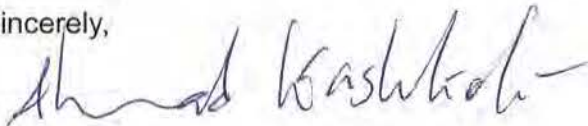
- A. Compliance with the Federal Clean Air Act: (a) Provide air quality studies that may have been done for the Project; and (b) if the Project is in a nonattainment area or attainment area subject to a maintenance plan; (i) provide a summary of the estimated emissions (in tons per year) that are expected from both the construction and operation of the Project for each federal criteria pollutant in a nonattainment or maintenance area, and indicate if the nonattainment designation is moderate, serious, or severe (if applicable); (ii) if emissions are above the federal de minimis levels, but the Project is sized to meet only the needs of current population projections that are used in the approved State Implementation Plan for air quality, quantitatively indicate how the proposed capacity increase was calculated using population projections.
- B. Compliance with the Coastal Zone Management Act: Identify whether the Project is within a coastal zone and the status of any coordination with the California Coastal Commission.

- C. Protection of Wetlands: Identify any portion of the proposed Project area that should be evaluated for wetlands or United States waters delineation by the United States Army Corps of Engineers (USACE), or requires a permit from the USACE, and identify the status of coordination with the USACE.
- D. Compliance with the Farmland Protection Policy Act: Identify whether the Project will result in the conversion of farmland. State the status of farmland (Prime, Unique, or Local and Statewide Importance) in the Project area and determine if this area is under a Williamson Act Contract.
- E. Compliance with the Migratory Bird Treaty Act: List any birds protected under this act that may be impacted by the Project and identify conservation measures to minimize impacts.
- F. Compliance with the Flood Plain Management Act: Identify whether or not the Project is in a Flood Management Zone and include a copy of the Federal Emergency Management Agency flood zone maps for the area.
- G. Compliance with the Wild and Scenic Rivers Act: Identify whether or not any Wild and Scenic Rivers would be potentially impacted by the Project and include conservation measures to minimize such impacts.

Following the preparation of the draft CEQA document for the Project, please provide us a copy of the document to review if the City is considering CWSRF financing. In addition, we would appreciate notices of any hearings or meetings held regarding environmental review for the Project.

Thank you for the providing us a copy of your NOP, and for the consideration of the CWSRF for the financing of the City's Project. If you have any questions or concerns, please feel free to contact me at (916) 341-5855, or by email at [Ahmad.Kashkoli@waterboards.ca.gov](mailto:Ahmad.Kashkoli@waterboards.ca.gov), or contact [Elysar.Naja@waterboards.ca.gov](mailto:Elysar.Naja@waterboards.ca.gov), or by phone at (916) 341-5799.

Sincerely,



Ahmad Kashkoli  
Senior Environmental Scientist

cc: State Clearinghouse  
(Re: SCH# 2014111068)  
P.O. Box 3044  
Sacramento, CA 95812-3044





# Basic Criteria for Cultural Resources Report Preparation

State Water Resources Control Board

Division of Financial Assistance

For Section 106 Consultation with the State Historic Preservation Officer (SHPO)  
under the National Historic Preservation Act

## CULTURAL RESOURCES REPORT

The Cultural Resources Report must be prepared by a qualified researcher that meets the Secretary of the Interior's Professional Qualifications Standards. Please see the Professional Qualifications Standards at the following website at: [http://www.cr.nps.gov/local-law/arch\\_stnds\\_9.htm](http://www.cr.nps.gov/local-law/arch_stnds_9.htm)

The Cultural Resources Report should include one of the four "findings" listed in Section 106. These include:

### ***"No historic properties affected"***

(no properties are within the area of potential effect (APE; including below the ground).

### ***"No effect to historic properties"***

(properties may be near the APE, but the project will not have any adverse effects).

### ***"No adverse effect to historic properties"***

(the project may affect "historic properties", but the effects will not be adverse).

### ***"Adverse effect to historic properties"***

Note: Consultation with the SHPO will be required if a "no adverse effect to historic properties" or an "adverse effect to historic properties" determination is made, to develop and evaluate alternatives or modifications to the proposed project that could avoid, minimize or mitigate adverse effects on "historic properties."

## RECORDS SEARCH

- A records search (less than one year old) extending to a half-mile beyond the project APE from a geographically appropriate Information Center is required. The records search should include maps that show all recorded sites and surveys in relation to the APE for the proposed project, and copies of the confidential site records included as an appendix to the Cultural Resources Report.
- The APE is three-dimensional (depth, length and width) and all areas (e.g., new construction, easements, staging areas, and access roads) directly affected by the proposed project.



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## NATIVE AMERICAN and INTERESTED PARTY CONSULTATION

- Native American and interested party consultation should be initiated at the planning phase of the proposed project to gather information to assist with the preparation of an adequate Cultural Resources Report.
- The Native American Heritage Commission (NAHC) must be contacted to obtain documentation of a search of the Sacred Lands Files for or near the project APE.
- All local Native American tribal organizations or individuals identified by the NAHC must be contacted by certified mail, and the letter should include a map and a description of the proposed project.
- Follow-up contact should be made by telephone and a phone log maintained to document the contacts and responses.
- Letters of inquiry seeking historical information on the project area and local vicinity should be sent to local historical societies, preservation organizations, or individual members of the public with a demonstrated interest in the proposed project.

Copies of all documents mentioned above (project description, map, phone log and letters sent to the NAHC and Native American tribal organizations or individuals and interested parties) must be included in the Cultural Resources Report.

**Contact Information:** For more information related to the CWSRF Program Cultural Resources and Requirements, please contact Mr. Ahmad Kashkoli at 916-341-5855 or [Ahmad.Kashkoli@waterboards.ca.gov](mailto:Ahmad.Kashkoli@waterboards.ca.gov)

## PRECAUTIONS

A finding of ***“no known resources”*** without supporting evidence is unacceptable. The Cultural Resources Report must identify resources within the APE or demonstrate with sufficient evidence that none are present.

***“The area is sensitive for buried archaeological resources,”*** followed by a statement that ***“monitoring is recommended.”*** Monitoring is not an acceptable option without good-faith effort to demonstrate that no known resource is present.

If ***“the area is already disturbed by previous construction”*** documentation is still required to demonstrate that the proposed project will not affect ***“historic properties.”*** An existing road can be protecting a buried archaeological deposit or may itself be a ***“historic property.”*** Additionally, previous construction may have impacted an archaeological site that has not been previously documented.

## SHPO CONSULTATION LETTER

Submit a draft consultation letter prepared by the qualified researcher with the Cultural Resources Report to the State Water Resources Control Board. A draft consultation letter template is available for download on the State Water Board webpage at: [http://www.waterboards.ca.gov/water\\_issues/programs/grants\\_loans/cwsrf\\_requirements.shtml](http://www.waterboards.ca.gov/water_issues/programs/grants_loans/cwsrf_requirements.shtml)



# California Environmental Quality Act Requirements

State Water Resources Control Board  
Division of Financial Assistance

The State Water Resources Control Board (State Water Board), Division of Financial Assistance, administers the Clean Water State Revolving Fund (CWSRF) Program. The CWSRF Program is partially funded by grants from the United States Environmental Protection Agency. All applicants seeking CWSRF financing must comply with the California Environmental Quality Act (CEQA), and provide sufficient information so that the State Water Board can document compliance with federal environmental laws. The "Environmental Package" provides the forms and instructions needed to complete the environmental review requirements for CWSRF Program financing. It is available at:  
[http://www.waterboards.ca.gov/water\\_issues/programs/grants\\_loans/srf/srf\\_forms.shtml](http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/srf_forms.shtml)



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to keep California's water clean.**  
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**Contact Information:** For more information related to the CWSRF Program environmental review process and requirements, please contact your State Water Board Project Manager or Mr. Ahmad Kashkoli at 916-341-5855 or [Ahmad.Kashkoli@waterboards.ca.gov](mailto:Ahmad.Kashkoli@waterboards.ca.gov)

## LEAD AGENCY

The applicant is usually the "Lead Agency" and must prepare and circulate an environmental document before approving a project. Only a public agency, such as a local, regional or state government, may be the "Lead Agency" under CEQA. If a project will be completed by a non-governmental organization, "Lead Agency" responsibility goes to the first public agency providing discretionary approval for the project.

## RESPONSIBLE AGENCY

The State Water Board is generally a "Responsible Agency" under CEQA. As a "Responsible Agency," the State Water Board must make findings based on information provided by the "Lead Agency" before financing a project.

## ENVIRONMENTAL REVIEW

The State Water Board's environmental review of the project's compliance with both CEQA and federal cross-cutting regulations must be completed before a project can be financed by the CWSRF Program.

## DOCUMENT REVIEW

Applicants are encouraged to consult with State Water Board staff early during preparation of CEQA document if considering CWSRF financing. Applicants shall also send their environmental documents to the State Water Board, Environmental Review Unit during the CEQA public review period. This way, any environmental concerns can be addressed early in the process.

## REQUIRED DOCUMENTS

The Environmental Review Unit requires the documents listed below to make findings and complete its environmental review. Once the State Water Board receives all the required documents and makes its own findings, the environmental review for the project will be complete.

- ✓ Draft and Final Environmental Documents: Environmental Impact Report, Negative Declaration, and Mitigated Negative Declaration as appropriate to the project
- ✓ Resolution adopting/certifying the environmental document, making CEQA findings, and approving the project
- ✓ All comments received during the public review period and the "Lead Agency's" responses to those comments
- ✓ Adopted Mitigation Monitoring and Reporting Plan, if applicable
- ✓ Date-stamped copy of the Notice of Determination or Notice of Exemption filed with the County Clerk(s) and the Governor's Office of Planning and Research
- ✓ CWSRF Evaluation Form for Environmental Review and Federal Coordination with supporting documents



[waterboards.ca.gov](http://waterboards.ca.gov)





# ENVIRONMENTAL REVIEW REQUIREMENTS

The Clean Water State Revolving Fund (CWSRF) Program is partially funded by the United States Environmental Protection Agency (EPA), and is subject to federal environmental regulations as well as the California Environmental Quality Act (CEQA). All applicants seeking CWSRF financing must comply with both CEQA and the federal cross-cutting regulations. The **"Environmental Package"** provides the forms and instructions needed to complete the environmental review requirements for CWSRF financing. The forms and instructions are available at: [http://www.waterboards.ca.gov/water\\_issues/programs/grants\\_loans/srf/srf\\_forms.shtml](http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/srf_forms.shtml).

## Lead Agency/Applicant

The applicant will generally act as the "Lead Agency" for environmental review. It will prepare, circulate, and consider the environmental documents prior to approving the project. It also provides the State Water Board with copies of the CEQA documents, and a completed **"Environmental Evaluation Form for Environmental Review and Federal Coordination"** ([http://www.waterboards.ca.gov/water\\_issues/programs/grants\\_loans/srf/docs/forms/application\\_environmental\\_package.pdf](http://www.waterboards.ca.gov/water_issues/programs/grants_loans/srf/docs/forms/application_environmental_package.pdf)) with supporting documents as part of the **"Environmental Package."**

## Responsible Agency/State Water Board

The State Water Board acts on behalf of EPA to review and consider the environmental documents before approving financing. The State Water Board may require additional studies or documentation to make its own CEQA findings, as well as circulate CEQA documents and other environmental reports to relevant federal agencies for consultation before making a determination about the project financing.

The Applicant must address all relevant federal agencies' comments before project financing is approved.

# FEDERAL CROSS-CUTTING REGULATIONS

The CWSRF Program requires consultation with relevant federal agencies on the following federal environmental regulations, if applicable to the project:

- Clean Air Act
- Coastal Barriers Resources Act
- Coastal Zone Management Act
- Endangered Species Act
- Environmental Justice
- Farmland Protection Policy Act
- Floodplain Management
- Magnuson-Stevens Fishery Conservation and Management Act
- Migratory Bird Treaty Act
- National Historic Preservation Act
- Protection of Wetlands
- Safe Drinking Water Act, Sole Source Aquifer Protection
- Wild and Scenic Rivers Act

The following is a brief overview of requirements for some of the key regulations.

## Clean Air Act (CAA)

The CAA general conformity analysis only applies to projects in areas not meeting the National Ambient Air Quality Standards or subject to a maintenance plan.

If project emissions are below the federal "de minimis" levels then:

- A general conformity analysis is not required.

If project emissions are above the federal "de minimis" levels then:

- A general conformity determination for the project must be made. A general conformity determination can be made if facilities are sized to meet the needs of current population projections used in an approved State Implementation Plan for air quality.

- Using population projections, applicants must explain how the proposed capacity increase was calculated.

An air quality modeling analysis is necessary of all projects for the following criteria pollutants, regardless of attainment status:

- Carbon monoxide
- Lead
- Oxides of nitrogen
- Ozone
- Particulate matter (PM2.5 and PM10)
- Sulfur dioxide

## Endangered Species Act (ESA)

The ESA requires an analysis of the effects on federally listed species. The State Water Board will determine the project's potential effects on federally listed species, and will initiate informal/formal consultation with the United States Fish and Wildlife Service (USFWS) and/or the National Marine Fisheries Service, as necessary under Section 7 of the ESA.

### Required Documents:

- ✓ A species list, less than one year old, from the USFWS and the California Department of Fish and Wildlife's Natural Diversity Database;
- ✓ A biological survey conducted during the appropriate time of year;
- ✓ Maps or documents (biological reports or biological assessments, if necessary); and
- ✓ An assessment of the direct or indirect impacts to any federally listed species and/or critical habitat. If no effects are expected, explain why and provide the supporting evidence.





## National Historic Preservation Act (NHPA)

Section 106 of the NHPA requires an analysis of the effects on "historic properties." The Section 106 process is designed to accommodate historic preservation concerns for federal actions with the potential to affect historic properties. Early consultation with appropriate government agencies, Indian tribes, and members of the public, will ensure that their views and concerns are addressed during the planning phase.

Historic properties (i.e., buildings, structures, objects, and archaeological sites 50 years or older) are properties that are included in the National Register of Historic Places or meet the criteria for the National Register.

### Required Documents:

- ✓ A draft State Historic Preservation Officer consultation request letter; and
- ✓ A cultural resources report on historic properties conducted according to the Secretary of the Interior's Standards, including:
  - A clearly defined Area of Potential Effect (APE), specifying the length, width, and depth of excavation, with a map clearly illustrating the project APE;
  - A records search, less than one year old, extending to a half-mile beyond the project APE;
  - Written description of field methods;
  - Identification and evaluation of historic properties within the project's APE; and
  - Documentation of consultation with the Native American Heritage Commission and local Native American tribes.

## ADDITIONAL INFORMATION

If your project has the potential to affect biological resources or historic properties, the consultation process can be lengthy. Please contact the State Water Board staff early in your planning process to discuss what additional information may be needed for your specific project.

Please contact your State Water Board Project Manager or Mr. Ahmad Kashkoli at (916) 341-5855 or [Ahmad.Kashkoli@waterboards.ca.gov](mailto:Ahmad.Kashkoli@waterboards.ca.gov) for more information related to the CWSRF Program environmental review process and requirements.



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STATE WATER RESOURCES CONTROL BOARD  
REGIONAL WATER QUALITY CONTROL BOARDS

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# Environmental Review Requirements

State Water Resources Control Board  
Division of Financial Assistance



## San Diego County Archaeological Society, Inc.

Environmental Review Committee

4 December 2014

To: Ms. Myra Herrmann  
Development Services Department  
City of San Diego  
1222 First Avenue, Mail Station 501  
San Diego, California 92101

Subject: Notice of Preparation of a Draft Environmental Impact Report  
Pure Water Program  
Project No. 386038

Dear Ms. Herrmann:

Thank you for the Notice of Preparation for the subject project, received by this Society last month.

We are pleased to note the inclusion of historical resources in the list of subject areas to be addressed in the DEIR, and look forward to reviewing it during the upcoming public comment period. To that end, please include us in the distribution of the DEIR, and also provide us with a copy of the cultural resources technical report(s).

SDCAS appreciates being included in the City's environmental review process for this project.

Sincerely,

  
James W. Royle, Jr., Chairperson  
Environmental Review Committee

cc: SDCAS President  
File



# SAN DIEGO COUNTY REGIONAL AIRPORT AUTHORITY

P.O. BOX 82776, SAN DIEGO, CA 92138-2776  
619.400.2400 WWW.SAN.ORG

December 22, 2014

City of San Diego Development Services Center  
Attn: Myra Herrmann, Environmental Planner  
1222 First Avenue, MS 501  
San Diego, CA 92101

Subject: Scoping Comments regarding the Pure Water Program, City of San Diego  
(No. 386038)

Dear Ms. Herrmann:

Thank you for the opportunity to provide scoping comments for the Program EIR related to the Pure Water Program, City of San Diego (No. 386038). The San Diego County Regional Airport Authority was established by state law in 2003 to operate San Diego International Airport and to address the San Diego region's long-term air transportation needs. San Diego International Airport – funded through users fees and not local taxes – is the nation's busiest single-runway commercial service airport, serving approximately 18 million passengers in 2014.

SDCRAA staff attended both the public scoping meetings held December 9 and 11, 2014 by the City of San Diego's Planning Department and subsequently contacted City staff for more project information regarding the proposed program and facilities. The Program EIR should provide a detailed description and site plan of the Harbor Drive facility and describe its operations as well as the pipelines and utility corridors. If subsequent environmental review is conducted, it should include a more detailed description of the Harbor Drive facility and the alignment of all pipelines to the facility. It should also describe where the existing facilities and utilities at Harbor Drive facility will be relocated or reconstructed.

The EIR Impact Analysis should address impacts of the proposed Harbor Drive facility on:

- Land Use including compatibility with airport operations at San Diego International Airport and the San Diego Airport Land Use Compatibility Plan (ALUCP);
- Water Quality;
- Air Quality including control of odors, nuisances and wildlife/vector attractants;
- Biological Resources including bird/wildlife and vector attractants in proximity to airport operations/aircraft;




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INTERNATIONAL  
AIRPORT

- Duration and schedule of Construction and Construction effects;
- Lighting and Glare particularly on airport operations/aircraft; and
- Aesthetics/Visual Resources including specific heights of facilities/structures.

Thank you for the opportunity to provide comments. Please include the San Diego County Regional Airport Authority on distribution of all notices, programmatic project information and subsequent environmental review documents. If there are any questions, please contact Mr. Ted Anasis, Manager – Airport Planning at (619) 400-2478 and [tanasis@san.org](mailto:tanasis@san.org).

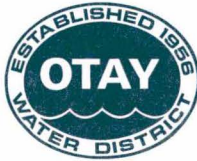
Thank you,

  
Jeffrey Woodson  
Vice President, Development

---

JW/TA/ljt

cc: SDCRAA Board Members  
Thella F. Bowens, President/CEO



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2554 SWEETWATER SPRINGS BOULEVARD, SPRING VALLEY, CALIFORNIA 91978-2004  
TELEPHONE: 670-2222, AREA CODE 619

[www.otaywater.gov](http://www.otaywater.gov)

December 22, 2014

*Mailed via USPS and electronic mail  
to DSDEAS@sandiego.gov*

Myra Herrmann  
Environmental Planner  
City of San Diego  
Development Services Center  
1222 First Avenue, MS 501  
San Diego, CA 92101

SUBJECT: Pure Water San Diego Program; Project No. 386038

Dear Ms. Herrmann:

The Otay Water District (Otay WD) is very interested in this project and would like to be added to your distribution list so that we will have an opportunity to review the environmental documents for the Pure Water Program. The Otay WD intends to be very active in the review process.

Some of the District's concerns include:

1. The Otay WD is concerned about the impact this program will have on recycled water availability and the cost of recycled water. For this program to be successful, recycled water must remain an important component of the regional water supply portfolio. It must not become a more expensive water supply to replace recycled water.
2. The City's Recycled Water study appears to assume that the Otay WD's recycled water demands will end in 2026 when the contract term ends, but in fact the demands will continue indefinitely. The City must continue to be responsible for meeting the existing and future recycled water demands of the Otay WD supplied from the SBWRP.
3. The analysis of the effects of the Pure Water Program on Water Supply should not be limited to the Participating Agencies (PA's) of the Metro System and the City of San Diego Metro areas. The recycled water and Pure Water Program market planning area should include any agency that is a member of the San Diego County Water Authority and the PA's. Expanding the study area will help to achieve the intended purpose of the program.

4. It should be recognized that the San Diego County Water Authority (SDCWA) is the agency with primary responsibility for regional water supply planning efforts. The SDCWA needs to be a significant player in the development of this project.
5. Members representing the PA's need to be included in the planning process so that the PA's interests are fairly represented and balanced with the City's.
6. The drafts of all study reports should be submitted to the PA's for review and comment. Comments received from the PA's need to be fully addressed in a timely manner and incorporated into the final draft PEIR Report. The Final PEIR Report and technical studies should be prepared and distributed to all stakeholders and the PA's.

The Otay WD appreciates the opportunity to participate in the environmental review process for this project. The Otay WD requests continued coordination on the development of the project and we look forward to receiving future environmental documents related to this project. If you have any questions regarding these comments, please contact Lisa Coburn-Boyd, Environmental Compliance Specialist at (610) 670-2219 or email, [lisa.coburn-boyd@otaywater.gov](mailto:lisa.coburn-boyd@otaywater.gov). Thank you for the opportunity to review the Notice of Preparation of a Program Environmental Impact Report for the Pure Water Program.

Sincerely,  
OTAY WATER DISTRICT



Mark Watton  
General Manager

MW:jf





# County of San Diego

**MARK WARDLAW**  
DIRECTOR  
PHONE (858) 694-2962  
FAX (858) 694-2555

PLANNING & DEVELOPMENT SERVICES  
5510 OVERLAND AVENUE, SUITE 310, SAN DIEGO, CA 92123  
[www.sdcounty.ca.gov/pds](http://www.sdcounty.ca.gov/pds)

**DARREN GRETLER**  
ASSISTANT DIRECTOR  
PHONE (858) 694-2962  
FAX (858) 694-2555

December 24, 2014

Myra Herrmann, Senior Environmental Planner  
City of San Diego, Development Services Dept.  
1222 First Avenue, Mail Stop 501  
San Diego, CA 92101

Sent via email at: [DSDEAS@san diego.gov](mailto:DSDEAS@san diego.gov)

## **COMMENTS ON THE ON NOTICE OF PREPARATION OF A PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE PURE WATER PROGRAM**

Dear Ms. Herrmann,

The County of San Diego (County) has received and reviewed the Notice of Preparation (NOP) of a Draft Program Environmental Impact Report (PEIR) for the Pure Water San Diego Program (Pure Water Program), dated November 24, 2014. The County appreciates the early coordination with the City of San Diego (City) on this project and appreciates this opportunity to comment. County Planning & Development Services (PDS) and Department of Public Works (DPW) staff have completed their review and have the following comments regarding the content of the NOP.

### **BIOLOGICAL RESOURCES**

1. Segments of the purified water pipelines extend into key locations associated with the County's designated Multiple Species Conservation Program (MCSP) lands, and depending on the final alignment could impact preserves under County ownership and management. The PEIR should study impacts to biological resources and consistency with the County MSCP Sub Area Plan.

### **TRANSPORTATION AND TRAFFIC**

2. There is a potential for County-maintained roadways to be directly impacted by the Pure Water Program. All paved and unpaved County roadways damaged, disturbed, or removed by the work permitted shall be repaired to the satisfaction of DPW's Private Development Construction Inspection and Road Maintenance Sections.
3. All work within the County's right-of-way will require permits from the County.
4. A County Traffic Control Plan will be required to identify traffic operation and safety measures during the construction of this project.

5. If the proposed project would generate new vehicular trips that will create significant cumulative impacts to neighboring County roadways, the applicant should contribute to the County's Transportation Impact Fee (TIF) program as mitigation for cumulative impacts to County facilities based upon the number of project trips distributed onto County roadways.

The TIF for projects located in neighboring jurisdictions is calculated based on the number of trips a project will generate onto affected County roadways and a per-trip rate factor developed for the project area.

## **HYDROLOGY AND WATER QUALITY**

6. The project may generate offsite impacts in regards to Water Quality into County lands, storm drain facilities, and receiving waters. By following the County's Standard Urban Stormwater Mitigation Plan (SUSMP) requirements the project will minimize its water quality impact to receiving waters.
7. The project may consider integrating post-construction treatment control Best Management Practices (BMPs), Low Impact Development (LID), Source Control BMPs and hydromodification management practices in accordance with the County's SUSMP.
8. The project may also consider integrating construction BMPs and associated plans for conformance with the County's Grading Ordinance, Watershed Protection Ordinance and State of California's Construction General Permit.

The County appreciates the opportunity to review and comment on the Pure Water Program. County staff looks forward to on-going coordination on this project as the program planning, design and construction proceeds. We look forward to providing additional assistance at your request. If you have any questions regarding these comments, please contact Sheri McPherson, Land Use/Environmental Planner, at (858) 694-3064, or via email at [sheri.mcperson@sdcountry.ca.gov](mailto:sheri.mcperson@sdcountry.ca.gov).

Sincerely,



DARREN GRETTLER, Assistant Director  
Planning & Development Services

Email cc:

Adam Wilson, Policy Advisor, District 2  
Matthew Parr, Land Use Advisor, District 2  
Adam Kaye, Policy Advisor, District 3  
Gabe Gutierrez, Policy Advisor, District 4  
Conor McGee, CAO Staff Officer, LUEG  
Richard Chin, Associate Transportation Specialist, DPW  
Sheri McPherson, Land Use/Environmental Planner, PDS



# RINCON BAND OF LUISEÑO INDIANS

## Culture Committee

1 W. Tribal Road · Valley Center, California 92082 ·  
(760) 297-2621 or (760) 297-2622 & Fax: (760) 749-8901



December 3, 2014

Myra Herrmann  
Environmental Planner  
1222 First Avenue, MS 501  
San Diego, CA 92101

### Re: Pure Water Program

Dear Ms. Herrmann:

This letter is written on behalf of the Rincon Band of Luiseño Indians. Thank you for inviting us to submit comments on the Pure Water Program Project. Rincon is submitting these comments concerning your projects potential impact on Luiseño cultural resources.

The Rincon Band has concerns for the impacts to historic and cultural resources and the finding of items of significant cultural value that could be disturbed or destroyed and are considered culturally significant to the Luiseño people. This is to inform you, your identified location is not within the Luiseño Aboriginal Territory. We recommend that you locate a tribe within the project area to receive direction on how to handle any inadvertent findings according to their customs and traditions.

If you would like information on tribes within your project area, please contact the Native American Heritage Commission and they will assist with a referral.

Thank you for the opportunity to protect and preserve our cultural assets.

Sincerely,

Rose Duro  
Chairman  
Rincon Culture Committee

# HAYNIE LAW GROUP

A Professional Corporation

Excel Centre  
17140 Bernardo Center Drive  
Suite 354  
San Diego CA 92128  
tel 858.485.7700  
fax 858.485.7707  
www.haynlaw.com

Allen D. Haynie  
cell 619.972.1497  
ahaynie@haynlaw.com

December 24, 2014

Ms. Myra Herrmann  
Environmental Planner  
City of San Diego Development Services Center  
1222 First Avenue, MS 501  
San Diego, CA 92101

Re: Response to Notice of Preparation – City of San Diego Pure Water Program – Project No. 386038

Dear Ms. Herrmann:

We represent McMillin-NTC, LLC (“McMillin”), the developer of a 252-room hotel, 215-room hotel, 183-room hotel, and associated restaurant facilities (“Hotel Project”) on a 15.85 acre site (“Hotel Site”) located at the intersection of North Harbor Drive and Lee Court in the City of San Diego (“City”). On June 4, 2013, the City Council of the City of San Diego approved the development of the Hotel Project on the Hotel Site in order to further the goals of the City’s approved Naval Training Center (“NTC”) San Diego Reuse Plan, NTC Precise Plan and Local Coastal Program and the NTC Redevelopment Plan. On December 12, 2013, the California Coastal Commission also approved the Hotel Project. The development of the Hotel Project represents the last phase of the overall development approved by the Redevelopment Agency of the City as reflected in the Disposition and Development Agreement (“DDA”) dated June 26, 2000, as amended. Both the DDA and the NTC Precise Plan designate the Hotel Site for development of approximately 650 hotel rooms. In fact, McMillin is contractually obligated to the City in its role as the successor agency to the Redevelopment Agency of the City pursuant to the DDA to develop the Hotel Project on the Hotel Site.

McMillin has reviewed the Notice of Preparation (“NOP”) for the City’s Pure Water Program (“PW Program”), dated November 24, 2014, and is concerned that the PW Program as described in the NOP could unnecessarily and negatively impact the goals of the City’s NTC San Diego Reuse Plan, NTC Precise Plan and Local Coastal Program, and the NTC Redevelopment Plan, as well as the approved Hotel Project on the Hotel Site.

The NOP indicates that the City is proposing to locate all or part of the advanced and recycled water treatment facilities (“Treatment Facilities”) on approximately 23-acres of land located at Harbor Drive and immediately adjacent to the Hotel Site (“Harbor Site”). The location

December 24, 2014

Page 2

of the Treatment Facilities appear to be driven by conclusions in the City's Recycled Water Study dated July 2012 ("2012 RW Study"), which failed to acknowledge the planned for 650 hotel rooms on the Hotel Site or the other recreation and visitor uses within the vicinity of the Harbor Site. The 2012 RW Study also appears to have limited its analysis of alternative sites for the Treatment Facilities to locations already owned by the City. The comparison of locations in the 2012 RW Study is faulty because the City can locate the Treatment Facilities on land that it does not currently own and, therefore, the 2012 RW Study should not be relied on as the basis for the preparation of the NOP.

Although McMillin recognizes that the NOP indicates that the CEQA document prepared for the PW Program will be a Program EIR and that more detailed environmental analysis will occur as each phase of the PW Program is implemented, there are certain environmental issues that should be analyzed early in the planning process in order that the proper range of alternatives can be fully evaluated in the Program EIR. The following are issues that McMillin request be fully analyzed in the Program EIR:

1. The NOP suggests that the only alternative to the Harbor Site are other sites currently owned by the City as identified in the 2012 RW Study. Unlike private sector projects that cannot realistically consider alternative locations that are not available for purchase, the City has the ability to condemn land on which it can locate the Treatment Facilities. The cost of such condemnation of land is not prohibitive considering the overall size and scope of the PW Program. McMillin requests that the Program EIR adequately consider alternative locations for the Treatment Facilities that would not negatively impact the existing and planned for development described in the NTC San Diego Reuse Plan, NTC Precise Plan and Local Coastal Program, NTC Redevelopment Plan, and approved Hotel Project.

2. McMillin has tremendous concerns about noise and odor impacts that could result from locating the Treatment Facilities on the Harbor Site. The Program EIR should carefully evaluate whether it is appropriate or feasible to locate such a use in the middle of a recreation and tourist area. In addition to potential impacts to the Hotel Project, the other hotel and recreation uses on both sides of the channel could be negatively impacted by locating the Treatment Facilities on the Harbor Site.

3. Location of the Treatment Facilities on the Harbor Site appears inconsistent with the recreation and visitor serving land uses outlined in the NTC San Diego Reuse Plan, NTC Precise Plan and Local Coastal Program, and the NTC Redevelopment Plan for this part of the City. All of these City approved land use plans emphasize the goal of creating a welcoming recreation and tourist environment on both the west and east sides of the channel. The development intensity and potential land use conflicts presented by the Treatment Facilities being located on the Harbor Site may undermine such recreation and visitor serving focus.

4. Any discussion of the Treatment Facilities on the Harbor Site should discuss mitigation measures that could be implemented to mitigate negative impacts to the Hotel Project,

# HAYNIE LAW GROUP

A Professional Corporation

December 24, 2014

Page 3

including the implementation of a buffer area between the Hotel Site and the Treatment Facilities and required design features that would mitigate potential land use, visual, noise, and odor impacts. Although McMillin questions the appropriateness of locating the Treatment Facilities on the Harbor Site, it would welcome the opportunity to discuss with City staff the sort of mitigation measures that would be necessary to mitigate for potential impacts to the Hotel Project and the adjacent recreation and visitor serving uses in the area.

The City has a great interest in seeing the Hotel Project developed and achieve the commercial success that will generate approximately \$4,000,000 to \$5,000,000 annually to the City in the form of transient occupancy taxes. Location of the Treatment Facilities on the Harbor Site could negatively impact the Hotel Project as well as the other hotel and recreation uses in the immediate proximity to the Harbor Site. The Program EIR should carefully analyze such impacts and consider potential alternative locations on which the Treatment Facilities could be located in the City.

We appreciate your consideration of the above requests and look forward to reviewing the Program EIR to assure that these issues have been appropriately discussed. We also request that copies of all future public notices concerning the PW Program be sent to the following individual: Ms. Kim Elliott, McMillin-NTC, LLC, 2750 Womble Road, San Diego, CA 92106.

Very truly yours,

HAYNIE LAW GROUP

A handwritten signature in black ink, appearing to read 'A. Haynie', with a long horizontal flourish extending to the right.

By: \_\_\_\_\_  
Allen D. Haynie

cc: Kim Elliott, McMillin-NTC, LLC

December 28, 2014

Myra Herrmann, Environmental Planner  
Development Services Center  
1222 First Avenue, MS 501  
San Diego, CA 92101  
Via email: DSDEAS@sandiego.gov

Dear Ms. Herrmann:

RE: Notice of Preparation for Pure Water EIR, Comments on

The San Diego Audubon Society (SDAS) strongly supports the implementation of the Pure Water Project. We think that the Project will have substantial environmental benefits for our region's natural environment. We hope that the EIR will clearly identify the environmental benefits and point out alternatives to improve them and also identify the negative environmental impacts and point out measures to reduce them.

Those benefits include reducing the energy needed to provide water for our region, reducing the discharge of Green House Gasses (GHGs) related to water supply, and reducing the need to extract water from environmentally stressed wildlife areas such as the Bay Delta, the Colorado River, and the Colorado River Delta.

We will express some concerns about the NOP in the following paragraphs.

#### PROJECT CAPACITY, 83 MGD

The Project Description section of the NOP states that "the project will create up to 83 million gallons per day." It may well be practical and beneficial to create more than that. There is no reason to limit the size of the project to 83 MGD. For the project to achieve its intent of representing the equivalence of full secondary wastewater treatment, the City must create at least 83 MGD, not up to 83 MGD. The City has also entered a Cooperative Agreement with environmental organizations that requires that the City convert at least 83 MGD from wastewater to potable water. Some future interpretation of regulations might require more than 83 MGD to satisfy the regulatory agencies.

Since the cost of water from the Pure Water project will be less than most other sources, there will probably be economic reasons to increase the capacity beyond 83 MGD in the not too distant future. It would be unfortunate if the program were either delayed or costs increased because of the need for a future program level CEQA document to increase the capacity from 83 MGD to something a little higher.

For all these reasons, we urge that the project description state that the Pure Water Project will convert at least 83 MGD to potable water so that it will accurately reflect the minimum requirements for the project. If there is a need for an upper limit, it should indicate an upper limit based on engineering limitations, not the current minimum target.

#### ALTERNATIVES

We are concerned that the alternatives described in the NOP do not present enough

alternatives to describe what may occur in the future. This could result in lost time and expense for supplemental analysis in the future.

In the Alternatives section, the NOP lists a single alternative for direct potable reuse. The project could end up being a hybrid of indirect and direct potable reuse. We suggest that a hybrid system also be mentioned in the Alternatives section in case doing so might prevent the need for a supplemental CEQA document in the future.

There are two distinct versions of Direct Potable Reuse (DPR). One would discharge highly treated water into a reservoir to mix with raw water for treatment. The other version would discharge the highly treated water into the treated water system, as the Poseidon desalinated plant will do. We suggest that the PUD consider having the EIR identify alternatives using both versions of DPR in case doing so might prevent needing a supplemental CEQA document in the future.

### BIOLOGICAL RESOURCES

Many of the potential routes for a pipeline to the San Vicente Reservoir cross very sensitive inland habitat areas. We urge that the PEIR process aggressively seek alternatives that will have the minimum impact on wildlife habitats and watersheds. If DPR or IPR using a more urban reservoir turns out to be acceptable to environmental agencies, we urge that the PEIR provide a clear path for switching to such an alternative.

### ENERGY

We urge that the PEIR provide system level alternatives that will maximize energy efficiency. This should include reducing energy in construction and post-construction in treatment plants, pumping, and reuse, disposal, and transportation of solid, liquid, and gas by-products.

### GREENHOUSE GASSES

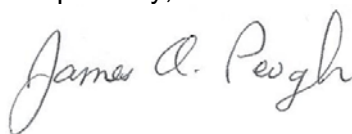
On page 12 the Statement of Work states: "If the program results in emissions exceeding 900 metric tons per year, a Green House Gass (GHG) analysis shall be done." This is a very high impact program. We urge that the PEIR include a rigorous examination of GHGs and measures to reduce them whether or not 900 metric tons is exceeded. We also urge that the PEIR's GHG analysis should seek measures by which the new Pure Water facilities can help reduce the GHG discharges of existing nearby older facilities where practical.

### NO PROJECT ALTERNATIVE

According to information that has been presented to us, the No Project Alternative would have a much larger impact on energy use, green house gasses, water quality, and increasing demand on at-risk water sources than the Pure Water Program. We urge that the PEIR clearly present the difference in environmental impacts for the benefit of the public and decision makers, current and long into the future.

For questions or follow-up the undersigned can be reached at [peugh@cox.net](mailto:peugh@cox.net) or 619-224-4591. Please notify us of future documents, hearings, milestones, and decisions related to the Pure Water Project, its CEQA process, and its implementation.

Respectfully,

A handwritten signature in cursive script that reads "James A. Peugh".

James A. Peugh  
Conservation Chair

CC: Keli Balo



**From:** [John Stump](#)  
**To:** [DSD EAS](#); [CLK City Clerk](#)  
**Cc:** [Balo, Keli](#)  
**Subject:** Comment on PURE Notice  
**Date:** Tuesday, December 09, 2014 4:35:42 PM

---

**John Stump**  
Brown Building  
4133 Poplar  
City Heights, California 92105  
619-281-7394 [jwstump@cox.net](mailto:jwstump@cox.net)

December 9, 2014

Ms. Myra Herrmann, Environmental Planner  
City of San Diego  
Development Services Center  
1222 First Avenue, MS 501  
San Diego, California 92101

City of San Diego  
C/o San Diego City Clerk  
202 C Street  
San Diego, California 92101

*Via: First Class United States Mail and Email to [DSDEAS@saniego.gov](mailto:DSDEAS@saniego.gov) & [cityclerk@saniego.gov](mailto:cityclerk@saniego.gov)*

**RE: Public Notice of the Preparation of A Program Environmental Impact Report And Scoping Meeting** Pure Water Program Point Loma San Diego PEIR/PN Initial Comments 1.

Dear Ms. Herman,

Thank you for your above captioned notice. I was somewhat surprised by the rapidness of the issuance of this notice so quickly following the Mayor's proposal and the acceptance of his report by City Council under **ITEM-330: Point Loma Wastewater Treatment Plant - National Pollutant Discharge Elimination System (NPDES) Permit Application. (Citywide.)** for MEETING OF TUESDAY, NOVEMBER 18, 2014, AT 2:00 PM. The testimony by the City and the Public and the materials presented to Council, at that time, including the above link, and the CITY TV video, at [http://granicus.sandiego.gov/MediaPlayer.php?view\\_id=3&clip\\_id=6268](http://granicus.sandiego.gov/MediaPlayer.php?view_id=3&clip_id=6268), are hereby incorporated into my comments, by reference.

My testimony, before the Council on November 18, 2014 on this matter, raised objection to the appearance that the Council, as the CEQA Legislative body, was being asked to select a single program and approach, with great specificity, including specific technologies, phasing schedules, and facility locations and land swaps, before the study of alternates under the California Environmental Quality Act (CEQA) and or the National Environmental Protection Act (NEPA). Predetermination of a single project before the open and public participation in the preparation of a study / report raises serious concern whether any future study is a sham. I am again requesting that the proposed study includes and objective analysis of alternatives.

The alternatives at minimum should include the proven traditional methods of sewage treatment and indirect reuse in addition to the pure fresh flush system of direct reuse. The city in its program EIR and or EIS must demonstrate how it intends to mitigate the impacts of climate change by achieving meaningful greenhouse gas (GHG) reductions within the County, consistent with Assembly Bill No. 32, the governor's Executive Order S-3-05, and CEQA guidelines (Cal. Code Regs., tit. 14, § 15000 et seq. [CEQA Guidelines]). The City should perform environmental review that meets both the California Environmental Quality Act (CEQA) and the Federal National Environmental Protection Action (NEPA). Simultaneous preparation is required because the City has suggested that some unknown portion is based on speculative receipt of grants from federal grant sources and the City is making a federal EPA discharge application. I am concerned that there may be attempts to influence Council in adopting the results of the Study /Report by the City's Mayoral Executive branch department personnel or private non-governmental individuals posing as stakeholders or some kind of special committee. I request that the executive branch, your department and other members of the City staff not permit such communications or organize any nonpublic meetings. I reference City Attorney Opinion LO-95-2 Limitations on Councilmember Participation in Environmental Document Process review.

I am concerned about two specific assumptions in the Pure alternative. The required, yet un studied and unfinanced, relocation of the Harbor Drive Public Safety Training facility to place a PURE sewage treatment facility at this location, adjacent to Liberty Station and the phased delay of conversion of the E"PA recommended Ozone purification methods to replace the current chemical chloramine . Please address these items in the study/report. Overall, I am concerned that the Pure program is premised on a continuation of unsustainable regional growth rates and ignores the linked growth in our region's Sister City Tijuana. I do not believe that conformance with our City's and County's Climate Action mitigation responsibilities.

Respectfully submitted,  
John Stump



This email has been checked for viruses by Avast antivirus software.

[www.avast.com](http://www.avast.com)



# CITY OF SAN DIEGO

PLANNING DEPARTMENT  
ENVIRONMENTAL ANALYSIS

## PUBLIC SCOPING MEETING

### Pure Water San Diego Program // DECEMBER 11, 2014

This meeting is being held pursuant to the *California Public Resources Code Section 21083.9 et seq.*, and is provide to give the public and interested parties an opportunity to submit comments regarding the potential environmental impacts of the proposed project. This information will be used to develop the scope and content of the proposed Environmental Impact Report (EIR) for the project to be described at this meeting. Please record your comments in the space provided below and submit this form to City staff at the conclusion of the meeting or you can mail to the address noted on the back of this form. Thank You.

**Comments:**

Please provide an estimate of the new miles of travel for workers and employees to work on, services, build, and then maintain the systems that result from any alternative under this proposal.

Does this program estimate that there will be any future or additional hotel, hospital or residential growth enabled by the additional water supplied by this program?

Name

John Stump

Signature

John Stump

Address

4133 Poplar, City Heights, CA 92105

Use back of sheet if additional space is necessary.

1 of 9



# CITY OF SAN DIEGO

PLANNING DEPARTMENT  
ENVIRONMENTAL ANALYSIS

## PUBLIC SCOPING MEETING

Pure Water San Diego Program // DECEMBER 11, 2014

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Comments: Please provide access to the contracts and agreements entered into to prepare the reports to Council and the environmental studies. Request is made under the San Diego City Charter and California Public Records Act.

I request the opportunity to examine and review the files as they are maintained prior to copying or incurring any costs

Name

John Shump

Signature

Address

4133 Poplar City Heights, CA 92105  
Brown building @ COX.net

Use back of sheet if additional space is necessary.



# CITY OF SAN DIEGO

PLANNING DEPARTMENT  
ENVIRONMENTAL ANALYSIS

## PUBLIC SCOPING MEETING

### Pure Water San Diego Program // DECEMBER 11, 2014

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Comments:

Please provide the formulas and methods of calculation for any population estimates or other areas of projecting future demand or reduction in ocean pollution.

Please provide the assumptions, formulas and methods used to calculate and energy used to carry out the Pure program.

Name

John Stump

Signature

[Handwritten Signature]

Address

4133 Poplar City Heights, CA 92105

Use back of sheet if additional space is necessary.

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# CITY OF SAN DIEGO

PLANNING DEPARTMENT  
ENVIRONMENTAL ANALYSIS

## PUBLIC SCOPING MEETING

Pure Water San Diego Program // DECEMBER 11, 2014

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Comments:

Please provide an explanation if any, for phased or delayed compliance with EPA preferred conversion from chemical water treatment versus the proposed future Ozone high energy purification process.

Please provide an estimate of the miles of new pipelines that will be required. How much overburden will be removed?

Name

John Stump

Signature

[Handwritten Signature]

Address

433 Poplar City Heights, CA

Use back of sheet if additional space is necessary.

429



# CITY OF SAN DIEGO

PLANNING DEPARTMENT  
ENVIRONMENTAL ANALYSIS

## PUBLIC SCOPING MEETING

Pure Water San Diego Program // DECEMBER 11, 2014

This meeting is being held pursuant to the *California Public Resources Code Section 21083.9 et seq.*, and is provide to give the public and interested parties an opportunity to submit comments regarding the potential environmental impacts of the proposed project. This information will be used to develop the scope and content of the proposed Environmental Impact Report (EIR) for the project to be described at this meeting. Please record your comments in the space provided below and submit this form to City staff at the conclusion of the meeting or you can mail to the address noted on the back of this form. Thank You.

**Comments:** Please provide an estimate of of the existing water pipe, that will be replaced or upgraded during the proposed project, under each alternative? Will any ~~new~~ pipes containing asbestos be replaced, upgraded or changed? How what number or volume of such asbestos pipes will be involved? How would such asbestos pipes be handled and/or disposed of after taking such pipes out of service? Will any such pipes be left in service?

Name

John Slump

Signature

Address

4133 Poplar, City Heights, CA 92105

Use back of sheet if additional space is necessary.

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# CITY OF SAN DIEGO

PLANNING DEPARTMENT  
ENVIRONMENTAL ANALYSIS

## PUBLIC SCOPING MEETING

Pure Water San Diego Program // DECEMBER 11, 2014

This meeting is being held pursuant to the *California Public Resources Code Section 21083.9 et seq.*, and is provide to give the public and interested parties an opportunity to submit comments regarding the potential environmental impacts of the proposed project. This information will be used to develop the scope and content of the proposed Environmental Impact Report (EIR) for the project to be described at this meeting. Please record your comments in the space provided below and submit this form to City staff at the conclusion of the meeting or you can mail to the address noted on the back of this form.

Thank You.

Comments:

How will this Program be paid for? Do estimates of costs include costs incurred to date and for the preparation of this proposal, related studies and reports?

If you include possible grants please provide a chart of the city's past success in obtaining such grants?

What are the estimates, if any, for increases on the average water bill? How was this estimated or calculated?

Name

John Stump

Signature

Address

4133 Poplar

City Heights, CA 92105

Use back of sheet if additional space is necessary.

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# CITY OF SAN DIEGO

PLANNING DEPARTMENT  
ENVIRONMENTAL ANALYSIS

## PUBLIC SCOPING MEETING

Pure Water San Diego Program // DECEMBER 11, 2014

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Comments:

Please provide a list or table of the 100 largest water users by industrial classification, government institutional and residential users.

Do government agencies, in the project area, pay ~~the~~ rates similar to residential users, businesses or some special rate? Do schools, colleges, and hospital pay a rate similar to residential or business users? How much of the program cost will such institutional users pay? Is it ~~pro~~ directly proportional to water used. Are there any volume discounts.

Name

John Stump

Signature

John Stump

Address

4133 Poplar, City Heights CA 92105

Use back of sheet if additional space is necessary.

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# CITY OF SAN DIEGO

PLANNING DEPARTMENT  
ENVIRONMENTAL ANALYSIS

## PUBLIC SCOPING MEETING

Pure Water San Diego Program // DECEMBER 11, 2014

This meeting is being held pursuant to the *California Public Resources Code Section 21083.9 et seq.*, and is provide to give the public and interested parties an opportunity to submit comments regarding the potential environmental impacts of the proposed project. This information will be used to develop the scope and content of the proposed Environmental Impact Report (EIR) for the project to be described at this meeting. Please record your comments in the space provided below and submit this form to City staff at the conclusion of the meeting or you can mail to the address noted on the back of this form.

Thank You.

Comments: Will necessary additional facilities or pipelines enter or disturb any environmentally sensitive lands or water bodies? How close to any sensitive receptors will any new facility or pipeline be under the proposed alternatives?

Who are the members of the independent advisory panel and are there minutes or agendas for these meetings? Do members receive any compensation or reimbursement for participation. Are any members under contract or employed by City?

Name

John Stump

Signature

[Handwritten Signature]

Address

4133 Poplar, City Heights 92105

Use back of sheet if additional space is necessary.

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# CITY OF SAN DIEGO

PLANNING DEPARTMENT  
ENVIRONMENTAL ANALYSIS

## PUBLIC SCOPING MEETING

Pure Water San Diego Program // DECEMBER 11, 2014

This meeting is being held pursuant to the *California Public Resources Code Section 21083.9 et seq.*, and is provide to give the public and interested parties an opportunity to submit comments regarding the potential environmental impacts of the proposed project. This information will be used to develop the scope and content of the proposed Environmental Impact Report (EIR) for the project to be described at this meeting. Please record your comments in the space provided below and submit this form to City staff at the conclusion of the meeting or you can mail to the address noted on the back of this form. Thank You.

Comments:

Please provide in the basis for your water and sewage generation. Do your these estimates include the border Mexican population in our region? Do the estimates include the daily or periodic population that crosses into our region for work, services, and related

Please provide an estimate of tourism and hospital population uses versus residential population?

Name

John Stamp

Signature

[Handwritten Signature]

Address

4133 Poplar City Heights 92105

Use back of sheet if additional space is necessary.

9 of 9

**John Stump**  
Brown Building  
4133 Poplar  
City Heights, California 92105  
619-281-7394 [jwstump@cox.net](mailto:jwstump@cox.net)

December 24, 2014

Ms. Myra Herrmann, Environmental Planner  
City of San Diego  
Development Services Center  
1222 First Avenue, MS 501  
San Diego, California 92101

City of San Diego  
C/o San Diego City Clerk  
202 C Street  
San Diego, California 92101

Via: First Class United States Mail and Email to [DSDEAS@sandiego.gov](mailto:DSDEAS@sandiego.gov) & [cityclerk@sandiego.gov](mailto:cityclerk@sandiego.gov)

**RE: Renewed Public Records Request  
& Public Notice of the Preparation of A Program Environmental Impact Report And Scoping Meeting**  
Pure Water Program Point Loma San Diego PEIR/PN Initial Comments 4.

Dear Ms. Herman,

Thank you for the opportunity to comment on the above captioned notice. This is my fourth set of comments, as I have already commented on three earlier occasions, during this initial scoping process [Written comments of December 9, 2014; Oral Testimony at the hearing of December 11, 2014; and Nine pages of handwritten comments presented to you on December 11, 2014, at your hearing]. I again raise concerns regarding the apparent predetermination of a project by the Cities Executive and Legislative branches, prior to the conduct of either the NEPA or CEQA analyses. I bring to your attention *Tara v West Hollywood* [SAVE TARA, Plaintiff and Appellant, v. CITY OF WEST HOLLYWOOD, Defendant and Respondent; WASET, INC., et al., Real Parties in Interest and Respondents. S151402 SUPREME COURT OF CALIFORNIA 45 Cal. 4th 116; 194 P.3d 344; 84 Cal. Rptr. 3d 614; 2008 Cal. LEXIS 12737; 39 ELR 20272 ] – attached. At the December 11, 2014 hearing, I raised objection to engineering staff's presentation of a single exclusive project. I request that as you prepare the environmental studies that provide the ratepayers with a full and fair presentation of the alternatives to provide water and sewage treatment for San Diego.

The first page of my December 11, 2014 Hand Written Comments, delivered to your hand at the hearing, made a written Public Records request for access to the documents, including consultant contracts that have been used or engaged in preparation of the San Diego Pure project. This written request was made under cited California state law and provisions of our own City of San Diego Charter – attached. It has been more than ten days and I have not heard from you or your office. Perhaps with the holiday season your response has gotten lost in the mail; but I wanted to review these documents before completing my scoping comments. Please respond to my request for public records and provide me an opportunity to comment on the proposed environmental study's scope based on a review of the requested documents. Extension of the scoping comment period would be an appropriate remedy.

I am concerned regarding the existing and possible health and safety of human consumption water being and to be delivered under any systems the City of San Diego chooses. Earlier comments raised concerns regarding possible delays in conversion away from chemical purification and long distance transmission water purity. When will the City address fully concerns raised regarding the treatment of water with Chloramine, a long lasting chemical used when transmission

distances are extended from source? Will any proposed alternative continue the use of this class of chemicals? Can any or all of the alternatives accelerate the use of other proposed technologies to insure pure water delivery from the source to distant consumers? Will any alternative make removal a first priority or will it be phased , and how? Why not fix current purity and safety problems now?

In past written comments, I have raised the concern about the full removal of Asbestos containing pipes in the water and sewer systems. Do the current systems utilize any pipes or equipment that contains Asbestos? How much , where, and what is it used for? If so what is the proposal, under any alternative, to remove this Asbestos from both the Sewer and Water systems, particularly now that they may be interconnected? Will any alternative make removal a first priority or will it be phased , and how? Where and how will the Asbestos contamination be decommissioned and disposed of? Why not fix current purity and safety problems now?

Recently, I was been discussing proposals for direct potable reuse [“Fresh Flush Toilet-to-Tap”] rather than indirect potable re-use [“Aged and Reservoir mellowed Toilet-to-Tap”] alternatives with medical professionals. Two concerns have emerged with either of these alternatives. Water safety for medical procedures like flushing wounds, eye contamination or dental procedures and increased exposure to pharmaceuticals. Please address both of these concerns in your studies. Medical professionals have suggested that increased concentrations of pharmaceuticals and the use of a recycled un-sourced water supply may require medical offices, health facilities, and employer based eye and toxin washing station to install tanks, filters and purification equipment to prevent contamination of sensitive receptors, including but not limited to patients of all ages and workers exposed to injuries. A common response to such concerns has been “We test our water”, but neglects to describe the limits or nature of such tests. Please describe the tests that will be performed on the water from any alternative? Please include a description of any such test and include a full disclosure of the warranties, limits, and exclusions associated with each and any test. If a commercial testing procedure, testing equipment, or independent laboratory is used please include and present in your analysis copies of any warranties, limitation on use, and exclusions made or promulgated by these vendors or manufacturers? See attached.

Your analysis, of each alternative, should include consideration on the costs and remedial actions the prudent medical professional would be required to take if that alternative is selected and the prudent medical professional was to continue to use tap water. A similar analysis is requested concerning the safety and first aid stations for employers, schools, and residential care facilities.

An emerging industry in San Diego is high technology manufacturing of sensitive electronics, medical devices, and Nano technologies. Please include analysis , for each alternative, of the impacts of using sourced water versus the various levels of recycled water. If your review of industrial processes identifies any challenges; please describe the remediation measures and costs of those measures. Does any region of the country, competing with San Diego feature, as a competitive advantage, the quality or low cost of their water supply?

To aid in your analysis, I have attached a list of commonly prescribe pharmaceuticals. In your study design, analysis and response to my comments, I request that you provide baseline data on the levels of these pharmaceuticals. If you do not currently test for their presence and levels; please explain why. If you have selected tests which fail to test for these prescription only limited access chemical; please explain why. Please include in your analysis a comparison of the actual and



projected levels of each and any pharmaceutical or industrial chemical and there byproducts. Is there any health or safety advantage amongst sourced water, indirect potable re-use and direct potable re-use? Please provide an appendix which demonstrates your underlying data, sources, and calculations for your water purity analysis and conclusions.

I am concerned that there may be attempts to influence Council in adopting the results of the Study /Report by the City's Mayoral Executive branch department personnel or private non-governmental individuals posing as stakeholders or some kind of special committee. I request that the executive branch, your department and other members of the City staff not permit such communications or organize any nonpublic meetings. I reference City Attorney Opinion LO-95-2 Limitations on Councilmember Participation in Environmental Document Process review.

Overall, I am concerned that the Pure program is premised on a continuation of unsustainable regional growth rates and ignores the linked growth in our region's Sister co-joined City -Tijuana. Experience demonstrates that any growth in San Diego is proportionally matched with growth in Tijuana. Growth here fosters growth there and the demands for resources with associated pollution and sewage follows.

I do not believe that conformance with our City's and County's Climate Action mitigation responsibilities allow a business as usual approach with endless growth. . The City in its program EIR and or EIS must demonstrate how it intends to mitigate the impacts of climate change by achieving meaningful greenhouse gas (GHG) reductions within the County, consistent with Assembly Bill No. 32, the governor's Executive Order S-3-05, and CEQA guidelines (Cal. Code Regs., tit. 14, § 15000 et seq. [CEQA Guidelines]). The City should perform environmental review that meets both the California Environmental Quality Act (CEQA) and the Federal National Environmental Protection Action (NEPA). We can no longer adopt the convenient fiction that Tijuana, with its cross boarder sewage and traffic, is not part of our region's environmental setting.

Please immediately respond to my aging Public Records disclosure request. Please extend the comment period until such time as I have had reasonable time to inspect the records requested and make comment based on these records. . I have attached 5 documents that are herein incorporated as part of my comments by reference. These attachments are the case Tara v, West Hollywood; A list of Common Prescription Drugs; The 2015 budget of the Public Utilities Department; City Attorney Opinion restricting Council discussion of CEQA matters; and Section 215 of the SD City Charter on Public record access.

Please provide written response to my comments and include me in the list to receive notice of any further documents, hearings, opportunities to comment on these matters. I am particularly requesting adequate public notice of any stakeholder or advisory body convened or associated with this analysis or the San Diego PURE program or its successors.

Happy Holidays and all the best.

Respectfully submitted,s/

John Stump

Attachments

.

Confirmation of E Mail



**Date:** Wednesday, December 24, 2014 3:52 PM  
**From:** John Stump <jwstump@cox.net>  
**To:** DSDEAS@sandiego.gov, cityclerk@sandiego.gov, cityattorney@sandiego.gov, mherrmann@sandiego.gov  
brownbuilding@cox.net  
**Subject:** Public Records Request & Scoping comments SD PURE number 4

**John Stump**

Brown Building

4133 Poplar

City Heights, California 92105

619-281-7394 [jwstump@cox.net](mailto:jwstump@cox.net)

December 24, 2014

Ms. Myra Herrmann, Environmental Planner

City of San Diego

City of San Diego

C/o San Diego City Clerk

Development Services Center

202 C Street

1222 First Avenue, MS 501

San Diego, California 92101

San Diego, California 92101

Via: First Class United States Mail and Email to [DSDEAS@sandiego.gov](mailto:DSDEAS@sandiego.gov) & [cityclerk@sandiego.gov](mailto:cityclerk@sandiego.gov)

**RE: Renewed Public Records Request**

**& Public Notice of the Preparation of A Program Environmental Impact Report And Scoping Meeting** Pure Water Program Point Loma San Diego PEIR/PN Initial Comments 4.

Dear Ms. Herman,

Thank you for the opportunity to comment on the above captioned notice. This is my fourth set of comments, as I have already commented on three earlier occasions, during this initial scoping process [Written comments of December 9, 2014; Oral Testimony at the hearing of December 11, 2014; and Nine pages of handwritten comments presented to you on December 11, 2014, at your hearing]. I again raise concerns

regarding the apparent predetermination of a project by the Cities Executive and Legislative branches, prior to the conduct of either the NEPA or CEQA analyses. I bring to your attention *Tara v West Hollywood [SAVE TARA, Plaintiff and Appellant, v. CITY OF WEST HOLLYWOOD, Defendant and Respondent; WASET, INC., et al., Real Parties in Interest and Respondents. S151402 SUPREME COURT OF CALIFORNIA 45 Cal. 4th 116; 194 P.3d 344; 84 Cal. Rptr. 3d 614; 2008 Cal. LEXIS 12737; 39 ELR 20272]* –attached. At the December 11, 2014 hearing, I raised objection to engineering staff's presentation of a single exclusive project. I request that as you prepare the environmental studies that provide the ratepayers with a full and fair presentation of the alternatives to provide water and sewage treatment for San Diego.

The first page of my December 11, 2014 Hand Written Comments, delivered to your hand at the hearing, made a written Public Records request for access to the documents, including consultant contracts that have been used or engaged in preparation of the San Diego Pure project. This written request was made under cited California state law and provisions of our own City of San Diego Charter – attached. It has been more than ten days and I have not heard from you or your office. Perhaps with the holiday season your response has gotten lost in the mail; but I wanted to review these documents before completing my scoping comments. Please respond to my request for public records and provide me an opportunity to comment on the proposed environmental study's scope based on a review of the requested documents. Extension of the scoping comment period would be an appropriate remedy.

I am concerned regarding the existing and possible health and safety of human consumption water being and to be delivered under any systems the City of San Diego chooses. Earlier comments raised concerns regarding possible delays in conversion away from chemical purification and long distance transmission water purity. When will the City address fully concerns raised regarding the treatment of water with Chloramine, a long lasting chemical used when transmission distances are extended from source? Will any proposed alternative continue the use of this class of chemicals? Can any or all of the alternatives accelerate the use of other proposed technologies to insure pure water delivery from the source to distant consumers? Will any alternative make removal a first priority or will it be phased, and how? Why not fix current purity and safety problems now?

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Please provide written response to my comments and include me in the list to receive notice of any further documents, hearings, opportunities to comment on these matters. I am particularly requesting adequate public notice of any stakeholder or advisory body convened or associated with this analysis or the San Diego PURE program or its successors.

Happy Holidays and all the best.

Respectfully submitted,

/s/

John Stump

Attachments are incorporated to my comments by reference.

All the best,

**John Stump**

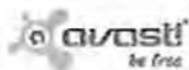
Brown Building

4133 Poplar

City Heights, California 92105






619-281-4663

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[www.avast.com](http://www.avast.com)

-  Tara\_v\_West\_Hollywood.doc
-  common drug\_list.pdf
-  2015 SDCity Budget Public Utilities.pdf
-  LO-90-2.pdf
-  Section 215Public access.docx

January 2014

## Standard Preferred Drug List

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Please consider talking to your doctor about prescribing preferred medications, which may help reduce your out-of-pocket costs. This list may help guide you and your doctor in selecting an appropriate medication for you.

The preferred drug list is regularly updated. Please visit **bcbstx.com** for the most up-to-date information.

To search for a drug name within this PDF document, use the **Control** and **F** keys on your keyboard, or go to **Edit** in the drop-down menu and select **Find/Search**. Type in the word or phrase you are looking for and click on **Search**.

## Introduction

Blue Cross and Blue Shield of Texas is pleased to present the 2014 Preferred Drug List. This is a list of preferred drugs which includes Preferred Brand drugs and a partial listing of generic drugs. **Members are encouraged to show this list to their physicians and pharmacists. Physicians are encouraged to prescribe drugs on this list, when right for the member. However decisions regarding therapy and treatment are always between members and their physician.**

**Preferred Drug List updates** – This list is regularly updated as generic drugs become available and changes take place in the pharmaceuticals market. For the most up-to-date information, visit **bcbstx.com** and log in to Blue Access for Members<sup>SM</sup> or call the number on the back of your ID card. Physicians can access the list from the provider portal at **bcbstx.com**.

## How preferred drugs are selected

Drugs on this list are selected based on the recommendations of a committee made up of physicians and pharmacists from throughout the country. The committee, which includes at least one representative from your health plan, reviews drugs regulated by the U.S. Food and Drug Administration (FDA).

Both drugs that are newly approved by the FDA as well as those that have been on the market for some time are considered. Drugs are selected based on safety, efficacy, cost and how they compare to other drugs currently on the list.

## How member payment is determined

This list shows prescription drug products in tiers. Generally, each drug is placed into one of three or four member payment tiers: generic, Preferred Brand or Non-Preferred Brand (not listed in this document). Specialty drugs can either be within the previous three tiers or can be a separate fourth tier depending on your benefit design. To verify your payment amount for a drug, visit **bcbstx.com** and log in to Blue Access for Members or call the number on the back of your ID card.

Your pharmacy benefit includes coverage for many prescription drugs, although some exclusions may apply. For example, drugs indicated for cosmetic purposes, e.g., Propecia, for hair growth, may not be covered. Prescription products that have over-the-counter (OTC) equivalents may not be covered. Drugs that are not FDA-approved for self-administration may be available through your medical benefit.



## How to use this list

Generic drugs are shown in lower-case **boldface** type. Most generic drugs are followed by a reference brand drug in (parentheses). The reference brand drug is a non- preferred (NP) brand and is only included as a reference to the brand. Some generic products have no reference brand.

Example: atorvastatin (Lipitor – brand is NP)

Preferred brand drugs are listed in all CAPITAL letters.

### Drugs used to treat multiple conditions

Some drugs in the same dosage form may be used to treat more than one medical condition. In these instances, each medication is classified according to its first FDA-approved use. Please check the index if you do not find your particular medication in the class/condition section that corresponds to your use.

## Generic drugs

Using generic drugs, when right for you, can help you save on your out-of-pocket medication costs. Generic drugs must be approved by the FDA just as brand drugs are, and must meet the same strict standards.

There are two types of generic drugs:

- A **generic equivalent** is made with the same active ingredient(s) at the same dosage as the reference drug.
- A **generic alternative** is a drug typically used to treat the same condition, but the active ingredient(s) differs from the brand drug.

According to the FDA, compared to its brand counterpart, an FDA-approved generic drug:

- Is chemically the same
- Works just as well in the body
- Is as safe and effective
- Meets the same standards set by the FDA

The main difference between the reference brand drug and the generic equivalent is that the generic often costs much less.

Preferred brand drugs typically move to a non- preferred brand tier after a generic equivalent becomes available. You may be responsible for the non- preferred brand member payment amount *plus* the difference in cost between the brand and generic equivalent if you or your doctor requests the reference brand rather than the generic. Generic drugs have the lowest member payment amount.

### Consider talking to your doctor about generic drugs

If your doctor writes a prescription for a brand drug that does not have a generic equivalent, consider asking if an appropriate generic alternative is available.

You can also let your pharmacist know that you would like a generic equivalent for a brand drug, whenever one is available. Your pharmacist can usually substitute a generic equivalent for its brand counterpart without a new prescription from your doctor.

Only your doctor can determine whether a generic alternative is right for you and must prescribe the medication.

## Coverage considerations

Most prescription drug benefit plans provide coverage for up to a 30-day supply of medication, with some exceptions. Your plan may also provide coverage for up to a 90-day supply of maintenance medications. Maintenance medications are those drugs you may take on an ongoing basis for conditions such as high blood pressure, diabetes or high cholesterol. Some plans may exclude coverage for certain agents or drug categories, like those used for erectile dysfunction or weight loss.

**Over-the-counter exclusions:** Your benefit plan may not provide coverage for prescription medications that have an over-the-counter version. You should refer to your benefit plan material for details about your particular benefits.

**Compounded medications:** Your benefit plan may not provide coverage for compounded medications. Please see your plan materials or call the number on the back of your ID card to determine whether compounded medications are covered and/or verify your payment amount.

**Repackaged medications:** Repackaged versions of medications already available on the market are not covered.

**Prior Authorization (PA):** Your benefit plan may require prior authorization for certain drugs that are high-cost or have the potential for misuse. This means that your doctor will need to submit a prior authorization request for coverage of these medications, and the request will need to be approved, before the medication will be covered under your plan. For the preferred medications listed in this document, if a prior authorization is commonly required, it will generally be noted next to the medication with a dot under the prior authorization column. Some plans may have prior authorization on additional medications beyond those noted in this document.

**Step Therapy (ST):** Your benefit plan may include a step therapy program. This means you may need to try another proven, cost-effective medication before coverage may be available for the drug included in the program. Many brand drugs have less-expensive generic or brand alternatives that might be an option for you. For the preferred medications listed in this document, if a step therapy is commonly required, it will generally be noted next to the medication with a dot under the step therapy column. Some plans may have step therapy programs on additional medications beyond those noted in this document.

**Dispensing Limits (DL):** Drug Dispensing limits help encourage medication use as intended by the FDA. Coverage limits are placed on medications in certain drug categories. For the preferred medications listed in this document, if a dispensing limit applies, it will generally be noted next to the medication with a dot under the dispensing limits column. Limits may include: quantity of covered medication per prescription, quantity of covered medication in a given time period, coverage only for members within a certain age range, and coverage only for members of a specific gender. If your doctor prescribes a greater quantity of medication than what the dispensing limit allows, you can still get the medication. However, you will be responsible for the full cost of the prescription beyond what your coverage allows. For a list of medications and their dispensing limits, visit [bcbstx.com](http://bcbstx.com).

**Remember, medication decisions are between you and your doctor.** Only your doctor can determine which medication is right for you. Discuss any questions or concerns you have about medications you are taking or are prescribed with your doctor.

## Specialty drugs

Specialty drugs are used in the treatment of medical conditions such as hepatitis, hemophilia, multiple sclerosis and rheumatoid arthritis. Specialty drugs may be oral, topical or injectable medications that can either be self-administered or administered by a health care professional. For a current list of specialty medications, visit **myprime.com** or **bcbstx.com** and log in to Blue Access for Members.

Note that some drug classes may be excluded by some plans and therefore may not be covered under your pharmacy benefit. Your plan may have a different coverage level for specialty drugs. If you have questions about your coverage for specialty medications or your prescription drug benefit, call the number on the back of your ID card.

### Prime Therapeutics Specialty Pharmacy Program

Through Prime Therapeutics Specialty Pharmacy, members can have covered specialty medications delivered directly to them or their doctor's office. When you receive specialty medications through Prime, you also receive at no additional charge the following services:

- Coordination of coverage between you, your doctor and your health plan
- Educational materials about your particular condition and information about managing potential medication side effects
- Syringes, sharps containers and other supplies with every shipment for self-injectables
- 24/7/365 phone access to a pharmacist for urgent medication issues

To order through Prime Therapeutics Specialty Pharmacy:

- Have your doctor call or fax your prescription to Prime Therapeutics Specialty Pharmacy. Your doctor can call 877-627-6337 or fax to 877-828-3939.
- If you have an existing prescription for a covered specialty medication, you can call 877-627-6337 to transfer your prescription.
- A Prime Therapeutics coordinator will contact you to arrange delivery of your medication.
- The prescription can be shipped directly to you or your prescribing doctor's office. Each package is individually marked for each member. Refrigerated drugs are shipped in temperature-controlled packaging.

If you have questions, please contact Prime Therapeutics Specialty Pharmacy at 877-627-6337, visit [www.PrimeTherapeutics.com/specialty](http://www.PrimeTherapeutics.com/specialty), or call the number on the back of your ID card.

\* Blue Cross and Blue Shield of Texas is a Division of Health Care Service Corporation, a Mutual Legal Reserve Company ("HCSC"). HCSC is an independent licensee of the Blue Cross Blue Shield Association. HCSC contracts with Prime Therapeutics to provide pharmacy benefit management and mail order pharmacy services and to administer this specialty pharmacy program. HCSC, as well as several other independent Blue Cross and Blue Shield licensees, has an ownership interest in Prime Therapeutics LLC.

## Abbreviation key

<b>caps</b> .....	capsules	<b>oint</b> .....	ointment
<b>chew tabs</b> .....	chewable tablets	<b>ophth</b> .....	ophthalmic
<b>conc</b> .....	concentrate	<b>OSM</b> .....	osmotic-release
<b>crm</b> .....	cream	<b>PA</b> .....	prior authorization
<b>DL</b> .....	dispensing limits	<b>SL</b> .....	sublingual
<b>ext-release</b> .....	extended-release	<b>soln</b> .....	solution
<b>inhal</b> .....	inhalation	<b>supp</b> .....	suppositories
<b>inj</b> .....	injection	<b>susp</b> .....	suspension
<b>lotn</b> .....	lotion	<b>ST</b> .....	step therapy
<b>NP</b> .....	non- preferred	<b>tabs</b> .....	tablets
<b>ODT</b> .....	orally disintegrating tablets		



Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
<b>ANTI-INFECTIVE DRUGS</b>				
<b>PENICILLINS</b>				
<b>amoxicillin/potassium clavulanate</b> (Augmentin – brand is NP)				
<b>amoxicillin/potassium clavulanate ext-release</b> (Augmentin XR – brand is NP)				
<b>amoxicillin, NP = chew tabs</b>				
<b>ampicillin caps</b>				
<b>dicloxacillin</b>				
<b>penicillin v potassium</b>				
<b>CEPHALOSPORINS</b>				
<b>cefaclor caps</b>				
<b>cefadroxil</b>				
<b>cefdinir</b>				
<b>cefepodoxime</b>				
<b>cefprozil</b>				
<b>ceftriaxone</b> (Rocephin – brand is NP)				
<b>cefuroxime</b> (Ceftin – brand is NP)				
<b>cephalexin, NP = tabs</b> (Keflex – brand is NP)				
<b>SUPRAX tabs</b>				
<b>MACROLIDES</b>				
<b>azithromycin susp</b> (Zithromax – brand is NP)				
<b>azithromycin tabs</b> (Zithromax – brand is NP)			•	
<b>clarithromycin</b> (Biaxin – brand is NP)				
<b>clarithromycin ext-release</b> (Biaxin XL – brand is NP)			•	
<b>erythromycin delayed-release caps</b>				
<b>ZITHROMAX packets</b>				
<b>TETRACYCLINES</b>				
<b>demeclocycline</b>				
<b>doxycycline hyclate</b> (Vibramycin – brand is NP)				

Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
<b>doxycycline monohydrate</b> (Adoxa, Monodox - brands are NP)				
<b>minocycline</b> (Dynacin, Minocin – brands are NP)				
<b>FLUOROQUINOLONES</b>				
<b>ciprofloxacin</b> (Cipro – brand is NP)				
<b>ciprofloxacin ext-release</b> (Cipro XR – brand is NP)			•	
<b>levofloxacin</b> (Levaquin – brand is NP)				
<b>ofloxacin tabs</b>				
<b>AMINOGLYCOSIDES</b>				
<b>neomycin sulfate</b>				
<b>paromomycin</b>				
TOBI, NP = Podhaler	•		•	
<b>TUBERCULOSIS</b>				
<b>ethambutol</b> (Myambutol – brand is NP)				
<b>isoniazid tabs</b>				
<b>isoniazid/rifampin</b> (Rifamate – brand is NP)				
<b>MYCOBUTIN</b>				
<b>PRIFTIN</b>				
<b>pyrazinamide</b>				
<b>rifampin</b> (Rifadin – brand is NP)				
<b>FUNGAL INFECTIONS</b>				
<b>fluconazole</b> (Diflucan – brand is NP)				
<b>flucytosine</b> (Ancobon – brand is NP)				
<b>griseofulvin microsize</b> (Grifulvin V – brand is NP)				
<b>itraconazole</b> (Sporanox – brand is NP)				
<b>NOXAFIL</b>		•		
<b>nystatin oral</b>				
<b>terbinafine</b> (Lamisil – brand is NP)				
<b>VFEND susp</b>		•		
<b>voriconazole</b> (Vfend tabs – brand is NP)		•		
<b>VIRAL INFECTIONS</b>				

Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
<b>Cytomegalovirus</b>				
VALCYTE				
<b>Hepatitis</b>				
<b>adefovir</b> (Hepsera)				
BARACLUDE				
HEPSERA				
INCIVEK	•	•		
PEGASYS	•	•		
<b>ribavirin</b> (Copegus, Rebetol – brands are NP)	•			
VICTRELIS	•	•		
<b>Herpes</b>				
<b>acyclovir</b> (Zovirax – brand is NP)				
<b>famciclovir</b> (Famvir – brand is NP)				
<b>valacyclovir</b> (Valtrex – brand is NP)				
<b>HIV/AIDS</b>				
<b>abacavir</b> (Ziagen tabs – brand is NP)			•	
APTIVUS			•	
ATRIPLA			•	
CRIXIVAN			•	
<b>didanosine delayed-release</b> (Videx EC – brand is NP)			•	
EMTRIVA			•	
EPIVIR soln			•	
EPZICOM			•	
FUZEON	•		•	
INTELENCE			•	
INVIRASE			•	
ISENTRESS			•	
KALETRA			•	
<b>lamivudine</b> (Epivir tabs – brand is NP)			•	
<b>lamivudine/zidovudine</b> (Combivir – brand is NP)			•	
LEXIVA			•	
<b>nevirapine tabs</b> (Viramune – brand is NP)			•	

Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
NORVIR			•	
PREZISTA			•	
RESCRIPTOR			•	
REYATAZ			•	
SELZENTRY			•	
<b>stavudine</b> (Zerit – brand is NP)			•	
STRIBILD			•	
SUSTIVA			•	
TIVICAY			•	
TRIZIVIR			•	
TRUVADA			•	
VIDEX			•	
VIRACEPT			•	
VIRAMUNE susp			•	
VIRAMUNE XR			•	
VIREAD			•	
ZIAGEN soln			•	
<b>zidovudine</b> (Retrovir – brand is NP)			•	
<b>MALARIA</b>				
<b>atovaquone/proguanil 250-100 mg</b> (Malarone – brand is NP)				
<b>chloroquine phosphate</b> (Aralen – brand is NP)				
DARAPRIM				
<b>hydroxychloroquine</b> (Plaquenil – brand is NP)				
MALARONE 62.5-25 mg				
<b>mefloquine</b>				
PRIMAQUINE				
<b>WORM INFECTIONS</b>				
ALBENZA				
BILTRICIDE				
STROMECTOL				
<b>OTHER ANTI-INFECTIVES</b>				
<b>clindamycin</b> (Cleocin, Cleocin Pediatric – brands are NP)				

Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
DAPSONE				
<b>erythromycin/sulfisoxazole</b>				
<b>metronidazole tabs</b> (Flagyl – brand is NP)				
<b>sulfamethoxazole/trimethoprim</b> (Bactrim – brand is NP)				
<b>trimethoprim</b>				
<b>vancomycin</b> (Vancocin – brand is NP)				
XIFAXAN 550 mg			•	
ZYVOX			•	
<b>CANCER DRUGS</b>				
AFINITOR, NP = DISPERZ	•	•		
ALKERAN tabs				
<b>anastrozole</b> (Arimidex – brand is NP)				
<b>bicalutamide</b> (Casodex – brand is NP)				
CYCLOPHOSPHAMIDE tabs				
EMCYT				
<b>exemestane</b> (Aromasin – brand is NP)				
FARESTON				
<b>flutamide</b>				
GLEEVEC	•	•		
<b>hydroxyurea</b> (Hydrea – brand is NP)				
<b>letrozole</b> (Femara – brand is NP)				
LEUCOVORIN CALCIUM tabs, 10 mg, 15 mg				
<b>leucovorin calcium tabs, 5 mg, 25 mg</b>				
LEUKERAN				
<b>megestrol</b> (Megace – brand is NP)				
MEKINIST	•	•		
<b>mercaptopurine</b> (Purinethol – brand is NP)				
MESNEX tabs				
<b>methotrexate</b>				
MYLERAN				
NEXAVAR	•	•		

Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
NILANDRON				
SPRYCEL	•	•		
SUTENT	•	•		
SYLATRON	•	•		
TABLOID				
TAFINLAR	•	•		
<b>tamoxifen</b>				
TARCEVA	•	•		
TASIGNA	•	•		
TEMODAR	•	•		
<b>temozolomide</b> (Temodar)	•	•		
<b>tretinoin caps</b>	•	•		
TREXALL				
VOTRIENT	•	•		
XALKORI	•	•		
XELODA	•	•		
ZELBORAF	•	•		
ZYTIGA	•	•		
<b>HORMONES, DIABETES AND RELATED DRUGS</b>				
<b>CORTICOSTEROIDS</b>				
<b>budesonide ext-release</b> (Entocort EC – brand is NP)				
CORTISONE				
<b>dexamethasone elixir; tabs, 0.5 mg, 0.75 mg, 1.5 mg, 4 mg, 6 mg</b>				
DEXAMETHASONE soln, 0.5 mg/5 mL				
<b>fludrocortisone</b>				
<b>hydrocortisone</b> (Cortef – brand is NP)				
<b>methylprednisolone</b> (Medrol – brand is NP)				
<b>prednisolone</b> (Prelone – brand is NP)				
<b>prednisolone sodium soln</b> (Orapred – brand is NP)				
PREDNISONE soln, 5 mg/5 mL; tabs, 50 mg				

Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
<b>prednisone tabs, 1 mg, 2.5 mg, 5 mg, 10 mg, 20 mg</b>				
PREDNISONE INTENSOL				
<b>MALE HORMONES</b>				
ANDRODERM		•	•	
ANDROGEL		•	•	
ANDROXY		•		
<b>danazol</b>		•		
<b>testosterone cypionate</b> (Depo-Testosterone – brand is NP)		•	•	
<b>testosterone enanthate</b> (Delatestryl – brand is NP)		•	•	
<b>ESTROGENS</b>				
COMBIPATCH				
DIVIGEL				
ENJUVIA				
<b>estradiol patches</b> (Climara – brand is NP)			•	
<b>estradiol tabs</b> (Estrace – brand is NP)				
<b>estradiol/norethindrone acetate</b> (Activella – brand is NP)				
<b>estropipate, NP = 3 mg</b>				
<b>PROGESTINS</b>				
<b>medroxyprogesterone acetate</b> (Provera – brand is NP)				
<b>norethindrone acetate</b> (Aygestin – brand is NP)				
<b>progesterone micronized</b> (Prometrium – brand is NP)				
<b>BIRTH CONTROL</b>				
ELLA			•	
<b>levonorgestrel</b> (Plan B, Plan B One-Step – brands are NP)			•	
<b>medroxyprogesterone acetate inj, 150 mg/mL</b> (Depo-Provera – brand is NP)				
MIRENA				
NUVARING			•	

Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
<b>oral contraceptives – all generics</b>				
ORTHO EVRA			•	
SKYLA				
<b>INFERTILITY</b>				
<b>chorionic gonadotropin</b>	•		•	
<b>clomiphene</b> (Clomid – brand is NP)			•	
FOLLISTIM AQ	•		•	
GANIRELIX ACETATE	•		•	
REPRONEX	•		•	
<b>DIABETES</b>				
<b>acarbose</b> (Precose – brand is NP)				
<b>glimepiride</b> (Amaryl – brand is NP)				
<b>glipizide</b> (Glucotrol – brand is NP)				
<b>glipizide ext-release</b> (Glucotrol XL – brand is NP)				
<b>glipizide/metformin</b> (Metaglip – brand is NP)				
GLUCAGON EMERGENCY KIT				
<b>glyburide</b>				
<b>glyburide micronized</b> (Glynase – brand is NP)				
<b>glyburide/metformin</b> (Glucovance – brand is NP)				
JANUMET			•	
JANUMET XR			•	
JANUVIA			•	
JUVISYNC			•	
KOMBIGLYZE XR			•	
<b>metformin</b> (Glucophage – brand is NP)				
<b>metformin ext-release</b> (Glucophage XR – brand is NP)				
<b>metformin ext-release OSM</b> (Fortamet – brand is NP)				
<b>nateglinide</b> (Starlix – brand is NP)				
ONGLYZA			•	
<b>pioglitazone</b> (Actos – brand is NP)				

Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
<b>pioglitazone/metformin</b> (Actoplus Met – brand is NP)				
PRANDIN				
<b>repaglinide</b> (Prandin)				
VICTOZA			•	•
<b>DIABETES - INSULINS</b>				
<b>Rapid-Acting Insulins</b>				
HUMALOG			•	
NOVOLOG			•	
<b>Short-Acting Insulins</b>				
HUMULIN R			•	
NOVOLIN R			•	
<b>Intermediate-Acting Insulins</b>				
HUMALOG MIX 50/50, 75/25			•	
HUMULIN N			•	
HUMULIN 70/30			•	
NOVOLIN N			•	
NOVOLIN 70/30			•	
NOVOLOG MIX 70/30			•	
<b>Basal Insulins</b>				
LANTUS			•	
LEVEMIR			•	
<b>THYROID REGULATION</b>				
<b>levothyroxine</b> (Synthroid – brand is NP)				
<b>liothyronine</b> (Cytomel – brand is NP)				
<b>methimazole</b> (Tapazole – brand is NP)				
<b>propylthiouracil</b>				
<b>GROWTH HORMONE</b>				
INCRELEX	•			
OMNITROPE	•	•		
<b>OTHER HORMONES AND RELATED DRUGS</b>				
ACTONEL			•	
<b>alendronate tabs, 5 mg, 10 mg, 35 mg, 70 mg</b> (Fosamax – brand is NP)			•	

Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
<b>cabergoline</b>				
<b>calcitonin-salmon</b> (Miacalcin – brand is NP)				
<b>calcitriol</b> (Rocaltrol – brand is NP)				
<b>desmopressin</b> (DDAVP – brand is NP)				
EVISTA				
FORTEO	•	•	•	
<b>ibandronate</b> (Boniva – brand is NP)			•	
<b>levocarnitine</b> (Carnitor – brand is NP)				
<b>methylergonovine</b>				
<b>octreotide</b> (Sandostatin – brand is NP)	•			
ORFADIN	•			
<b>paricalcitol</b> (Zemlar)				
SENSIPAR				
STIMATE				
ZEMPLAR				
<b>HEART AND CIRCULATORY DRUGS</b>				
<b>ANGIOTENSIN CONVERTING ENZYME (ACE) INHIBITORS AND COMBINATIONS</b>				
<b>benazepril</b> (Lotensin – brand is NP)				
<b>benazepril/hydrochlorothiazide</b> (Lotensin HCT – brand is NP)				
<b>captopril</b>				
<b>enalapril</b> (Vasotec – brand is NP)				
<b>enalapril/hydrochlorothiazide</b> (Vaseretic – brand is NP)				
<b>fosinopril</b>				
<b>fosinopril/hydrochlorothiazide</b>				
<b>lisinopril</b> (Prinivil, Zestril – brands are NP)				
<b>lisinopril/hydrochlorothiazide</b> (Zestoretic – brand is NP)				
<b>moexipril</b> (Univasc – brand is NP)				



Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
<b>moexipril/hydrochlorothiazide</b> (Uniretic – brand is NP)				
<b>perindopril</b> (Aceon – brand is NP)				
<b>quinapril</b> (Accupril – brand is NP)				
<b>quinapril/hydrochlorothiazide</b> (Accuretic – brand is NP)				
<b>ramipril</b> (Altace – brand is NP)				
<b>trandolapril</b> (Mavik – brand is NP)				
<b>ANGIOTENSIN II RECEPTOR ANTAGONISTS (ARBs) AND COMBINATIONS</b>				
<b>BENICAR</b>				
<b>BENICAR HCT</b>				
<b>irbesartan</b> (Avapro – brand is NP)				
<b>irbesartan/hydrochlorothiazide</b> (Avalide – brand is NP)				
<b>losartan</b> (Cozaar – brand is NP)				
<b>losartan/hydrochlorothiazide</b> (Hyzaar – brand is NP)				
<b>valsartan/hydrochlorothiazide</b> (Diovan HCT – brand is NP)				
<b>BETA BLOCKERS AND COMBINATIONS</b>				
<b>acebutolol</b> (Sectral – brand is NP)				
<b>atenolol</b> (Tenormin – brand is NP)				
<b>atenolol/chlorthalidone</b> (Tenoretic – brand is NP)				
<b>bisoprolol</b> (Zebeta – brand is NP)				
<b>bisoprolol/hydrochlorothiazide</b> (Ziac – brand is NP)				
<b>carvedilol</b> (Coreg – brand is NP)				
<b>INNOPRAN XL</b>				
<b>labetalol</b> (Trandate – brand is NP)				
<b>metoprolol succinate ext-release</b> (Toprol XL – brand is NP)				
<b>metoprolol tartrate</b> (Lopressor – brand is NP)				

Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
<b>nadolol</b> (Corgard – brand is NP)				
<b>PROPRANOLOL soln</b>				
<b>propranolol tabs</b>				
<b>propranolol ext-release</b> (Inderal LA – brand is NP)				
<b>TIMOLOL tabs</b>				
<b>CALCIUM CHANNEL BLOCKERS AND COMBINATIONS</b>				
<b>amlodipine</b> (Norvasc – brand is NP)				
<b>amlodipine/benazepril</b> (Lotrel – brand is NP)				
<b>diltiazem</b> (Cardizem – brand is NP)				
<b>diltiazem ext-release</b> (Cardizem CD, Cardizem LA, Dilacor XR, Tiazac – brands are NP)				
<b>felodipine ext-release</b>				
<b>nifedipine ext-release</b> (Adalat CC, Procardia XL – brands are NP)				
<b>verapamil ext-release</b> (Calan SR, Isoptin SR, Verelan, Verelan PM – brands are NP)				
<b>verapamil, NP = 40 mg</b> (Calan – brand is NP)				
<b>CHEST PAIN</b>				
<b>isosorbide dinitrate, NP = SL tabs</b> (Isordil – brand is NP)				
<b>isosorbide mononitrate</b> (Monoket – brand is NP)				
<b>isosorbide mononitrate ext-release</b> (Imdur – brand is NP)				
<b>nitroglycerin</b> (Nitro-Dur – brand is NP)				
<b>NITROSTAT</b>				
<b>CHOLESTEROL LOWERING</b>				
<b>atorvastatin</b> (Lipitor – brand is NP)				
<b>cholestyramine</b> (Questran, Questran Light – brands are NP)				
<b>colestipol</b> (Colestid – brand is NP)				
<b>CRESTOR</b>				

Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
<b>fenofibrate</b> (Lofibra, Tricor – brands are NP)				
<b>fenofibrate micronized</b> (Lofibra – brand is NP)				
<b>fenofibric acid delayed-release</b> (Trilipix)				
<b>gemfibrozil</b> (Lopid – brand is NP)				
<b>lovastatin</b> (Mevacor – brand is NP)				
<b>niacin ext-release</b> (Niaspan – brand is NP)				
<b>pravastatin</b> (Pravachol – brand is NP)				
<b>simvastatin</b> (Zocor – brand is NP)				
TRILIPIX				
WELCHOL				
<b>FLUID RETENTION</b>				
<b>acetazolamide 250 mg</b>				
<b>acetazolamide ext-release</b> (Diamox Sequels – brand is NP)				
<b>amiloride</b>				
<b>amiloride/hydrochlorothiazide</b>				
<b>bumetanide</b>				
<b>chlorothiazide</b>				
<b>furosemide, NP = soln, 8 mg/mL</b> (Lasix – brand is NP)				
<b>hydrochlorothiazide caps</b> (Microzide – brand is NP)				
<b>hydrochlorothiazide tabs</b>				
<b>indapamide</b>				
<b>methazolamide</b> (Neptazane – brand is NP)				
<b>metolazone</b> (Zaroxolyn – brand is NP)				
<b>spironolactone</b> (Aldactone – brand is NP)				
<b>spironolactone/hydrochlorothiazide</b> (Aldactazide – brand is NP)				
<b>torsemide</b> (Demadex – brand is NP)				

Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
<b>triarterene/hydrochlorothiazide</b> (Dyazide, Maxzide, Maxzide-25 – brands are NP)				
<b>HEART RHYTHM</b>				
<b>amiodarone</b> (Cordarone – brand is NP)				
<b>disopyramide</b> (Norpace – brand is NP)				
<b>flecainide</b>				
<b>mexiletine</b>				
MULTAQ				
<b>propafenone</b> (Rythmol – brand is NP)				
<b>propafenone ext-release</b> (Rythmol SR – brand is NP)				
<b>quinidine gluconate ext-release</b>				
<b>quinidine sulfate, NP = ext-release</b>				
<b>sotalol</b> (Betapace, Betapace AF – brands are NP)				
<b>OTHER HEART RELATED DRUGS</b>				
ADCIRCA	•	•	•	
<b>clonidine</b> (Catapres, Catapres-TTS – brands are NP)				
DIBENZYLINE				
<b>digoxin tabs</b> (Lanoxin – brand is NP)				
<b>doxazosin</b> (Cardura – brand is NP)				
<b>eplerenone</b> (Inspra – brand is NP)				
<b>guanfacine</b> (Tenex – brand is NP)				
<b>hydralazine</b>				
LETAIRIS	•	•	•	
<b>methyl dopa</b>				
<b>midodrine</b>				
<b>minoxidil</b>				
<b>prazosin</b> (Minipress – brand is NP)				
<b>sildenafil</b> (Revatio – brand is NP)	•	•	•	
<b>terazosin</b>				
TRACLEER	•	•	•	
<b>ERECTILE DYSFUNCTION</b>				
CIALIS		•	•	

Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
<b>BEE STING KITS</b>				
EPIPEN				
EPIPEN-JR				
<b>RESPIRATORY AGENTS</b>				
<b>ANTI-HISTAMINES</b>				
cetirizine syrup				
cyproheptadine				
promethazine, NP = supp, 50 mg				
<b>NASAL PRODUCTS</b>				
ASTEPRO			•	
azelastine (Astelin – brand is NP)			•	
flunisolide (Flunisolide – brand is NP)			•	
fluticasone propionate (Flonase – brand is NP)			•	
ipratropium (Atrovent – brand is NP)			•	
NASONEX			•	
triamcinolone (Nasacort AQ – brand is NP)			•	
<b>COUGH/COLD/ALLERGY</b>				
acetylcysteine				
<b>ASTHMA/COPD</b>				
ADVAIR DISKUS			•	
ADVAIR HFA			•	
albuterol 0.63 mg/3 mL, 1.25 mg/3 mL (Accuneb – brand is NP)			•	
albuterol inhal soln, 0.083%, 0.5%			•	
albuterol syrup, tabs				
ASMANEX			•	
ATROVENT HFA			•	
BREO ELLIPTA			•	
budesonide (Pulmicort Respules – brand is NP)			•	
COMBIVENT			•	
COMBIVENT RESPIMAT			•	
cromolyn inhal soln			•	

Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
DULERA			•	
FLOVENT DISKUS			•	
FLOVENT HFA			•	
FORADIL AEROLIZER			•	
ipratropium inhal soln			•	
ipratropium/albuterol (Duoneb – brand is NP)			•	
montelukast (Singulair – brand is NP)				
PROAIR HFA			•	
QVAR			•	
SPIRIVA HANDIHALER			•	
SYMBICORT			•	
terbutaline				
theophylline ext-release				
VENTOLIN HFA			•	
zafirlukast (Accolate – brand is NP)				
<b>OTHER RESPIRATORY DRUGS</b>				
FIRAZYR	•		•	
KALYDECO	•	•		
PULMOZYME	•			
<b>GASTROINTESTINAL DRUGS</b>				
<b>LAXATIVES</b>				
lactulose				
PEG – electrolytes for soln (Colyte, Golytely, Nulytely – brands are NP)				
<b>ULCER/GERD</b>				
cimetidine				
dicyclomine caps, tabs (Bentyl – brand is NP)				
famotidine (Pepcid – brand is NP)				
glycopyrrolate (Robinul – brand is NP)				
hyoscyamine (Anaspaz, Levsin, Levsin/SL – brands are NP)				
hyoscyamine ext-release (Levbid, Symax DuoTab – brands are NP)				

Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
<b>lansoprazole delayed-release</b> (Prevacid – brand is NP)			•	
<b>methscopolamine</b> (Pamine, Pamine Forte – brands are NP)				
<b>misoprostol</b> (Cytotec – brand is NP)				
NEXIUM			•	•
<b>omeprazole delayed-release</b> (Prilosec – brand is NP)			•	
<b>pantoprazole delayed-release</b> (Protonix – brand is NP)			•	
<b>ranitidine</b> (Zantac – brand is NP)				
<b>sucralfate</b> (Carafate – brand is NP)				
<b>NAUSEA AND VOMITING</b>				
EMEND caps			•	
<b>granisetron</b>			•	
<b>meclizine</b> (Antivert – brand is NP)				
<b>ondansetron</b> (Zofran, Zofran ODT – brands are NP)			•	
<b>ondansetron 24 mg</b>			•	
<b>trimethobenzamide</b> (Tigan – brand is NP)				
<b>DIGESTIVE ENZYMES</b>				
CREON				
ZENPEP				
<b>OTHER GASTROINTESTINAL DRUGS</b>				
ASACOL HD				
<b>balsalazide</b> (Colazal – brand is NP)				
<b>calcium acetate</b> (Eliphos, Phoslo – brands are NP)				
CANASA				
CHENODAL	•			
DELZICOL				
<b>diphenoxylate/atropine tabs</b> (Lomotil – brand is NP)				
<b>lactulose</b>				
LIALDA				
<b>loperamide</b>				

Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
<b>mesalamine</b>				
<b>metoclopramide</b> (Reglan – brand is NP)				
PENTASA				
<b>sulfasalazine</b> (Azulfidine – brand is NP)				
<b>sulfasalazine delayed-release</b> (Azulfidine EN-Tabs – brand is NP)				
<b>ursodiol</b> (Actigall, Urso 250, Urso Forte – brands are NP)				
<b>GENITOURINARY DRUGS</b>				
<b>URINARY TRACT INFECTIONS</b>				
<b>nitrofurantoin</b> (Furadantin – brand is NP)				
<b>nitrofurantoin macrocrystalline</b> (Macrochantin – brand is NP)				
<b>nitrofurantoin monohydrate/macrocrystalline</b> (Macrobid – brand is NP)				
<b>URINARY TRACT SPASMS</b>				
<b>oxybutynin</b>				
<b>oxybutynin ext-release</b> (Ditropan XL – brand is NP)				
<b>tolterodine</b> (Detrol – brand is NP)				
VESICARE				
<b>VAGINAL PRODUCTS</b>				
CLEOCIN supp				
<b>clindamycin</b> (Cleocin – brand is NP)				
CRINONE			•	
ESTRACE crm				
<b>metronidazole</b> (MetroGel-Vaginal – brand is NP)				
<b>terconazole</b> (Terazol – brand is NP)				
VAGIFEM				
<b>OTHER GENITOURINARY DRUGS</b>				
<b>alfuzosin ext-release</b> (Uroxatral – brand is NP)				

Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
AVODART				
CYSTAGON	•			
<b>finasteride</b> (Proscar – brand is NP)				
POTASSIUM CITRATE				
<b>potassium citrate/citric acid powder</b> (Polycitra-K – brand is NP)				
<b>sodium citrate/citric acid</b> (Shohl's – brand is NP)				
<b>tamsulosin</b> (Flomax – brand is NP)				
<b>CENTRAL NERVOUS SYSTEM DRUGS</b>				
<b>ANXIETY</b>				
<b>alprazolam</b> (Xanax – brand is NP)				
<b>alprazolam ext-release</b> (Xanax XR – brand is NP)			•	
<b>buspirone</b>				
DIAZEPAM oral soln, 1 mg/mL				
<b>diazepam tabs</b> (Valium – brand is NP)				
<b>hydroxyzine hcl</b>				
<b>hydroxyzine pamoate 25 mg, 50 mg</b> (Vistaril – brand is NP)				
<b>lorazepam</b> (Ativan – brand is NP)				
<b>lorazepam conc</b> (Lorazepam Intensol – brand is NP)				
<b>DEPRESSION</b>				
<b>amitriptyline</b>				
<b>bupropion</b> (Wellbutrin – brand is NP)				
<b>bupropion ext-release</b> (Wellbutrin SR, Wellbutrin XL – brands are NP)				
<b>citalopram</b> (Celexa – brand is NP)				
<b>clomipramine</b> (Anafranil – brand is NP)				
<b>desipramine</b> (Norpramin – brand is NP)				
<b>doxepin, NP = caps, 75 mg</b>				
<b>escitalopram</b> (Lexapro – brand is NP)				
<b>fluoxetine, NP = 60 mg</b> (Prozac – brand is NP)				
<b>fluvoxamine</b>				
<b>imipramine hcl</b> (Tofranil – brand is NP)				

Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
<b>mirtazapine, NP = 7.5 mg</b> (Remeron, Remeron SolTab – brands are NP)				
<b>nortriptyline caps</b> (Pamelor – brand is NP)				
<b>paroxetine hcl</b> (Paxil – brand is NP)				
<b>paroxetine hcl ext-release</b> (Paxil CR – brand is NP)				
<b>phenelzine</b> (Nardil – brand is NP)				
<b>sertraline</b> (Zoloft – brand is NP)				
<b>tranylcypromine</b> (Parnate – brand is NP)				
<b>trazodone</b>				
<b>venlafaxine</b>				
<b>venlafaxine ext-release caps</b> (Effexor XR – brand is NP)				
<b>venlafaxine ext-release tabs, NP = 225 mg</b>				•
<b>PSYCHOTIC AND BIPOLAR DISORDERS</b>				
<b>chlorpromazine</b>				
<b>clozapine</b> (Clozaril – brand is NP)			•	
FLUPHENAZINE HCL conc, elixir				
<b>fluphenazine hcl tabs</b>				
<b>haloperidol decanoate</b> (Haldol – brand is NP)				
<b>haloperidol lactate oral conc</b>				
<b>haloperidol tabs</b>				
<b>lithium carbonate</b>				
<b>lithium carbonate ext-release 300 mg</b> (Lithobid – brand is NP)				
<b>lithium carbonate ext-release 450 mg</b>				
<b>loxapine</b> (Loxitane – brand is NP)				
<b>olanzapine</b> (Zyprexa, Zyprexa Zydis – brands are NP)			•	
<b>perphenazine</b>				
<b>prochlorperazine</b>				
<b>quetiapine</b> (Seroquel – brand is NP)			•	



Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
<b>risperidone</b> (Risperdal, Risperdal M-Tab – brands are NP)			•	
SEROQUEL XR			•	
<b>thiothixene</b>				
<b>trifluoperazine</b>				
<b>ziprasidone</b> (Geodon – brand is NP)			•	
<b>SLEEP AIDS</b>				
<b>estazolam</b>				
<b>phenobarbital soln; tabs, 16.2 mg, 32.4 mg</b>				
<b>temazepam</b> (Restoril – brand is NP)				
<b>zaleplon</b> (Sonata – brand is NP)			•	
<b>zolpidem</b> (Ambien – brand is NP)			•	
<b>zolpidem ext-release</b> (Ambien CR – brand is NP)			•	
<b>HYPERACTIVITY/NARCOLEPSY</b>				
<b>amphetamine/dextroamphetamine</b> (Adderall – brand is NP)			•	
<b>amphetamine/dextroamphetamine ext-release</b> (Adderall XR – brand is NP)			•	
<b>caffeine citrate</b> (Cafcit – brand is NP)				
<b>dextroamphetamine</b>			•	
<b>dextroamphetamine ext-release</b> (Dexedrine Spansule – brand is NP)			•	
INTUNIV			•	
<b>methylphenidate tabs</b> (Ritalin – brand is NP)			•	
<b>methylphenidate ext-release caps; tabs, 20 mg</b> (Metadate CD, Ritalin LA, Ritalin SR - brands are NP)			•	
<b>modafinil</b> (Provigil – brand is NP)		•		
VYVANSE			•	
<b>MULTIPLE SCLEROSIS</b>				
BETASERON	•		•	
COPAXONE	•		•	

Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
REBIF	•		•	
TECFIDERA	•		•	
<b>OTHER CENTRAL NERVOUS SYSTEM DRUGS</b>				
<b>bupropion ext-release</b> (Zyban – brand is NP)				
CHANTIX				
<b>disulfiram</b> (Antabuse – brand is NP)				
<b>donepezil</b> (Aricept, Aricept ODT – brands are NP)				
EXELON patches, soln				
<b>galantamine</b> (Razadyne – brand is NP)				
<b>galantamine ext-release</b> (Razadyne ER – brand is NP)				
<b>naltrexone</b> (ReVia - brand is NP)			•	
NICOTROL INHALER				
NICOTROL NS				
NUDEXTA				
ORAP				
<b>rivastigmine caps</b> (Exelon – brand is NP)				
<b>PAIN RELIEF DRUGS</b>				
<b>NON-NARCOTIC DRUGS</b>				
<b>butalbital/acetaminophen</b>				
<b>butalbital/acetaminophen/caffeine</b> (Esgic, Esgic-Plus, Fioricet – brands are NP)				
<b>butalbital/aspirin/caffeine caps</b> (Fiorinal – brand is NP)				
<b>salsalate</b>				
<b>NARCOTIC DRUGS</b>				
<b>acetaminophen/codeine</b> (Tylenol w/ Codeine – brand is NP)				
<b>buprenorphine</b>		•	•	
<b>buprenorphine/naloxone SL tabs</b>		•	•	
<b>butalbital/aspirin/caffeine/codeine</b> (Fiorinal w/Codeine – brand is NP)				

Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
CODEINE SULFATE 15 mg				
<b>fentanyl lollipop</b> (Actiq – brand is NP)		•	•	
<b>fentanyl patches</b> (Duragesic – brand is NP)			•	
<b>hydrocodone/acetaminophen, NP = tabs, 2.5-325 mg</b> (Lortab – brand is NP)				
<b>hydrocodone/ibuprofen</b> (Ibudone, Reprexain, Vicoprofen – brands are NP)				
<b>hydromorphone soln, tabs</b> (Dilaudid – brand is NP)				
KADIAN			•	
<b>methadone conc</b> (Methadose – brand is NP)				
<b>methadone soln</b>				
<b>methadone tabs</b> (Dolophine – brand is NP)				
<b>morphine sulfate conc, soln</b>			•	
<b>morphine sulfate ext-release</b> (MS Contin – brand is NP)			•	
MORPHINE SULFATE supp, tabs				
<b>morphine sulfate ext-release</b> (Kadian)			•	
NUCYNTA ER			•	
<b>oxycodone</b> (Roxicodone – brand is NP)				
<b>oxycodone caps, conc, soln</b>				
<b>oxycodone/acetaminophen</b> (Percocet – brand is NP)				
<b>oxycodone/aspirin</b> (Percodan – brand is NP)				
OXYCONTIN			•	
SUBOXONE film		•	•	
<b>tramadol</b> (Ultram – brand is NP)			•	
<b>tramadol/acetaminophen</b> (Ultracet – brand is NP)				
<b>RHEUMATOID AND OSTEOARTHRITIS</b>				
CELEBREX			•	•

Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
<b>diclofenac potassium</b> (Cataflam – brand is NP)				
<b>diclofenac sodium delayed-release</b>				
<b>diclofenac sodium ext-release</b> (Voltaren-XR – brand is NP)				
ENBREL	•			•
<b>etodolac</b>				
<b>flurbiprofen</b>				
HUMIRA	•			•
<b>ibuprofen</b>				
<b>indomethacin</b>				
<b>ketoprofen</b>				
<b>leflunomide</b> (Arava – brand is NP)				
<b>meloxicam tabs</b> (Mobic – brand is NP)				
<b>nabumetone</b>				
<b>naproxen</b> (Naprosyn – brand is NP)				
<b>naproxen delayed-release</b> (EC-Naprosyn – brand is NP)				
<b>naproxen sodium</b> (Anaprox – brand is NP)				
<b>oxaprozin</b> (Daypro – brand is NP)				
<b>piroxicam</b> (Feldene – brand is NP)				
<b>sulindac</b> (Clinoril – brand is NP)				
<b>MIGRAINE HEADACHES</b>				
<b>acetaminophen/isometheptene/dichloralphenazone</b>				
IMITREX nasal spray			•	
MIGRANAL			•	
<b>naratriptan</b> (Amerge – brand is NP)			•	
<b>rizatriptan</b> (Maxalt, Maxalt-MLT – brands are NP)			•	
<b>sumatriptan inj, tabs</b> (Imitrex – brand is NP)			•	
<b>GOUT</b>				
<b>allopurinol</b> (Zyloprim – brand is NP)				
COLCRYS				
<b>probenecid</b>				

Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
<b>probenecid/colchicine</b>				
<b>NEUROMUSCULAR DRUGS</b>				
<b>SEIZURES</b>				
<b>carbamazepine</b> (Tegretol – brand is NP)				
<b>carbamazepine ext-release</b> (Carbatrol, Tegretol-XR – brands are NP)				
<b>CELONTIN</b>				
<b>clonazepam</b> (Klonopin – brand is NP)				
<b>DIASTAT</b>			•	
<b>DILANTIN</b> 30 mg				
<b>divalproex delayed-release</b> (Depakote, Depakote Sprinkles – brands are NP)				
<b>divalproex ext-release</b> (Depakote ER – brand is NP)				
<b>ethosuximide</b> (Zarontin – brand is NP)				
<b>gabapentin</b> (Neurontin – brand is NP)				
<b>GABITRIL</b> 12 mg, 16 mg				
<b>lamotrigine</b> (Lamictal – brand is NP)				
<b>levetiracetam</b> (Keppra – brand is NP)				
<b>LYRICA</b> caps				
<b>oxcarbazepine</b> (Trileptal – brand is NP)				
<b>phenytoin chew tabs</b> (Dilantin Infatabs – brand is NP)				
<b>phenytoin sodium ext-release</b> (Dilantin, Phenytek – brands are NP)				
<b>phenytoin susp</b> (Dilantin – brand is NP)				
<b>primidone</b> (Mysoline – brand is NP)				
<b>SABRIL</b>				
<b>TEGRETOL-XR</b> 100 mg				
<b>topiramate</b> (Topamax, Topamax Sprinkle – brands are NP)				
<b>valproic acid</b> (Depakene – brand is NP)				
<b>zonisamide</b> (Zonegran – brand is NP)				
<b>PARKINSON'S DISEASE</b>				
<b>amantadine, NP = tabs</b>				

Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
<b>APOKYN</b>	•			
<b>AZILECT</b>				
<b>benztropine</b>				
<b>bromocriptine</b> (Parlodel – brand is NP)				
<b>carbidopa/levodopa</b> (Parcopa, Sinemet – brands are NP)				
<b>carbidopa/levodopa ext-release</b> (Sinemet CR – brand is NP)				
<b>entacapone</b> (Comtan – brand is NP)				
<b>pramipexole</b> (Mirapex – brand is NP)				
<b>ropinirole</b> (Requip – brand is NP)				
<b>selegiline caps</b> (Eldepryl – brand is NP)				
<b>selegiline tabs</b>				
<b>trihexyphenidyl</b>				
<b>MUSCLE RELAXANTS</b>				
<b>baclofen</b>				
<b>chlorzoxazone</b> (Parafon Forte DSC – brand is NP)				
<b>cyclobenzaprine</b>				
<b>dantrolene</b> (Dantrium – brand is NP)				
<b>metaxalone</b> (Skelaxin – brand is NP)				
<b>methocarbamol</b> (Robaxin – brand is NP)				
<b>orphenadrine citrate ext-release</b>				
<b>orphenadrine/aspirin/caffeine 25-385-30 mg</b>				
<b>tizanidine</b> (Zanaflex – brand is NP)			•	
<b>OTHER NEUROMUSCULAR DRUGS</b>				
<b>MESTINON</b> syrup				
<b>MESTINON</b> TIMESPAN				
<b>pyridostigmine</b> (Mestinon – brand is NP)				
<b>riluzole</b> (Rilutek – brand is NP)				
<b>SUPPLEMENTS</b>				
<b>VITAMINS</b>				
<b>ergocalciferol</b> (Drisdol – brand is NP)				

Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
MEPHYTON				
<b>MULTIVITAMINS</b>				
<b>pediatric multivitamins</b>				
<b>pediatric vitamins ADC</b>				
PRENAPLUS				
PRENATABS FA				
PRENATAL VITAMINS PLUS				
PRENATAL 19, PRENATAL LOW IRON, PRENATAL PLUS				
SE-NATAL 19				
<b>MINERALS AND ELECTROLYTES</b>				
K-PHOS				
<b>potassium bicarbonate/chloride effervescent tabs, 25 mEq</b>				
<b>potassium chloride packets; soln, 10%</b>				
<b>potassium chloride ext-release (K-Tabs – brand is NP)</b>				
<b>potassium chloride ext-release caps (Micro-K – brand is NP)</b>				
<b>potassium phosphate/sodium phosphates (K-Phos Neutral – brand is NP)</b>				
<b>BLOOD MODIFYING DRUGS</b>				
ADVATE	•			
ALPHANATE	•			
ALPHANINE SD	•			
<b>anagrelide</b> (Agrylin – brand is NP)				
ARANESP	•	•		
BEBULIN	•			
BEBULIN VH	•			
BENEFIX	•			
<b>cilostazol</b> (Pletal – brand is NP)				
<b>clopidogrel</b> (Plavix – brand is NP)				
CORIFACT	•			
<b>cyanocobalamin inj</b>				

Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
<b>dipyridamole</b> (Persantine – brand is NP)				
DROXIA				
<b>enoxaparin</b> (Lovenox – brand is NP)			•	
EPOGEN	•	•		
FEIBA NF	•			
FEIBA VH IMMUNO	•			
<b>folic acid 1 mg</b>				
HELIXATE FS	•			
HEMOFIL M	•			
HUMATE-P	•			
KOATE-DVI	•			
KOGENATE FS	•			
KOGENATE FS BIO-SET	•			
MONOCLATE-P	•			
MONONINE	•			
NEULASTA	•			
NEUPOGEN	•			
NOVOSEVEN RT	•			
<b>pentoxifylline ext-release</b> (Trental – brand is NP)				
PROCRIT	•	•		
PROFILNINE SD	•			
RECOMBINATE	•			
RIXUBIS	•			
<b>warfarin</b> (Coumadin – brand is NP)				
WILATE	•			
XARELTO			•	
XYNTHA	•			
XYNTHA SOLOFUSE	•			
<b>TOPICAL DRUGS</b>				
<b>EYE</b>				
<b>Anti-infectives</b>				
BACITRACIN oint				
<b>bacitracin/polymyxin B oint</b>				

Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
<b>ciprofloxacin soln</b> (Ciloxan – brand is NP)				
<b>erythromycin oint</b>				
<b>gentamicin oint, soln</b> (Garamycin – brand is NP)				
NATACYN				
<b>neomycin/polymyxin B/bacitracin oint</b>				
<b>neomycin/polymyxin B/gramicidin soln</b> (Neosporin – brand is NP)				
<b>ofloxacin soln</b> (Ocuflox – brand is NP)				
<b>polymyxin B/trimethoprim soln</b> (Polytrim – brand is NP)				
<b>sulfacetamide sodium soln</b> (Bleph-10 – brand is NP)				
<b>tobramycin soln</b> (Tobrex – brand is NP)				
<b>trifluridine soln</b> (Viroptic – brand is NP)				
VIGAMOX				
<b>Steroids and Combination Products</b>				
<b>dexamethasone sodium phosphate soln</b>				
<b>fluorometholone susp</b> (FML Liquifilm – brand is NP)				
LOTEMAX				
<b>neomycin/polymyxin B/bacitracin/hydrocortisone oint</b>				
<b>neomycin/polymyxin B/dexamethasone oint, susp</b> (Maxitrol – brand is NP)				
<b>prednisolone acetate susp</b> (Pred Forte – brand is NP)				
PREDNISOLONE SODIUM PHOSPHATE soln, 1%				
<b>sulfacetamide sodium/prednisolone soln</b>				
TOBRADEX oint				
<b>tobramycin/dexamethasone susp</b> (Tobradex – brand is NP)				

Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
ZYLET				
<b>Glaucoma</b>				
ALPHAGAN P 0.1%				
AZOPT				
<b>brimonidine soln, 0.15%</b> (Alphagan P – brand is NP)				
<b>brimonidine soln, 0.2%</b>				
<b>carteolol soln</b>				
<b>dorzolamide soln</b> (Trusopt – brand is NP)				
<b>dorzolamide/timolol maleate soln</b> (Cosopt – brand is NP)				
<b>latanoprost soln</b> (Xalatan – brand is NP)			•	
<b>levobunolol soln, 0.5%</b> (Betagan – brand is NP)				
LUMIGAN			•	
<b>metipranolol soln</b> (Optipranolol – brand is NP)				
<b>pilocarpine soln</b> (Isopto Carpine – brand is NP)				
SIMBRINZA				
<b>timolol maleate soln</b> (Timoptic, Timoptic-XE – brands are NP)				
TRAVATAN Z			•	
<b>Other Eye Products</b>				
<b>atropine sulfate soln</b> (Isopto Atropine – brand is NP)				
<b>azelastine soln</b> (Optivar – brand is NP)				
<b>cromolyn soln</b>				
<b>cyclopentolate soln</b> (Cyclogyl – brand is NP)				
<b>diclofenac soln</b> (Voltaren – brand is NP)				
<b>flurbiprofen soln</b> (Ocufen – brand is NP)				
<b>homatropine soln</b> (Isopto Homatropine – brand is NP)				



Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
<b>ketorolac soln</b> (Acular, Acular LS – brands are NP)				
PATADAY				
<b>tropicamide soln</b> (Mydracyl – brand is NP)				
<b>EAR</b>				
<b>acetic acid soln</b>				
<b>benzocaine/antipyrine soln</b>				
CIPRODEX				
<b>hydrocortisone/acetic acid soln</b> (Vosol HC – brand is NP)				
<b>neomycin/polymyxin B/ hydrocortisone soln, susp</b> (Cortisporin – brand is NP)				
<b>ofloxacin soln</b>				
<b>MOUTH AND THROAT (local)</b>				
<b>cevimeline</b> (Evoxac – brand is NP)				
<b>clotrimazole troche</b>				
<b>lidocaine viscous</b>				
<b>nystatin susp</b>				
<b>pilocarpine</b> (Salagen – brand is NP)				
<b>triamcinolone dental paste</b>				
<b>ANORECTAL AGENTS</b>				
CORTIFOAM				
<b>hydrocortisone acetate crm, supp</b> (Anusol-HC, Proctocort – brands are NP)				
<b>hydrocortisone enema</b> (Cortenema – brand is NP)				
<b>SKIN CONDITIONS/PRODUCTS</b>				
<b>Acne</b>				
<b>adapalene</b> (Differin – brand is NP)			•	
<b>clindamycin</b> (Cleocin T – brand is NP)				
<b>clindamycin/benzoyl peroxide</b> (Benzacilin, Duac – brands are NP)				
DIFFERIN gel, 0.3%			•	
<b>erythromycin pads, soln</b>				

Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
<b>erythromycin/benzoyl peroxide</b> (Benzamycin – brand is NP)				
FINACEA				
<b>isotretinoin, NP = 30 mg</b>				
<b>metronidazole</b> (Metrocream, Metrogel, Metro lotion – brands are NP)				
<b>sulfacetamide sodium</b> (Klaron – brand is NP)				
<b>sulfacetamide sodium/sulfur, NP = susp, 10-5%</b>				
TAZORAC				
<b>tretinoin</b> (Retin-A – brand is NP)			•	
<b>tretinoin microsphere</b> (Retin-A Micro – brand is NP)			•	
<b>Anti-infectives</b>				
<b>ciclopirox crm, gel, shampoo, susp</b> (Loprox – brand is NP)				
<b>ciclopirox soln</b> (Penlac – brand is NP)				
<b>econazole</b>				
<b>ketoconazole crm</b>				
<b>ketoconazole shampoo, 2%</b> (Nizoral – brand is NP)				
<b>mupirocin</b> (Bactroban – brand is NP)				
<b>nystatin topical</b>				
<b>silver sulfadiazine</b> (Silvadene – brand is NP)				
<b>Corticosteroids</b>				
<b>alclometasone</b> (Aclovate – brand is NP)				
<b>amcinonide crm</b>				
<b>betamethasone dipropionate</b>				
<b>betamethasone dipropionate, augmented</b> (Diprolene – brand is NP)				
<b>betamethasone valerate</b>				
<b>clobetasol</b> (Clobex, Olux, Temovate – brands are NP)				
<b>desonide</b> (Desowen – brand is NP)				

Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
<b>desoximetasone crm, 0.25%; gel; oint, 0.25%</b> (Topicort – brand is NP)				
<b>diflorasone oint</b>				
<b>fluocinolone</b> (Derma-Smoothe/FS, Synalar – brands are NP)				
<b>fluocinonide</b>				
<b>fluticasone propionate</b> (Cutivate – brand is NP)				
<b>halobetasol</b> (Ultravate – brand is NP)				
<b>hydrocortisone topical</b>				
<b>hydrocortisone valerate</b> (Westcort – brand is NP)				
<b>mometasone</b> (Elocon – brand is NP)				
<b>nystatin/triamcinolone crm</b>				
<b>triamcinolone crm; lotn; oint, 0.025%, 0.1%</b>				
<b>Other Skin Products</b>				
<b>acitretin</b> (Soriatane)				
<b>aluminum chloride</b> (Drysol – brand is NP)				
<b>calcipotriene</b> (Dovonex – brand is NP)				
CARAC				
ELIDEL				
FLUOROPLEX				
<b>fluorouracil</b> (Efudex – brand is NP)				
<b>imiquimod</b> (Aldara – brand is NP)			•	
<b>lidocaine patches</b> (Lidoderm – brand is NP)				
<b>lidocaine topical, NP = lotn</b> (Xylocaine – brand is NP)				
<b>lidocaine/prilocaine crm</b> (Emla – brand is NP)				
<b>lindane</b>				
<b>malathion</b> (Ovide – brand is NP)				
<b>permethrin</b> (Elimite – brand is NP)				
<b>podofilox</b> (Condylox – brand is NP)				
PROTOPIC				

Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
<b>selenium sulfide</b>				
SOLARAZE				
SORIATANE				
VOLTAREN				
XERAC AC				
ZYCLARA			•	
ZYCLARA PUMP			•	
<b>MISCELLANEOUS CATEGORIES</b>				
<b>DIABETIC SUPPLIES</b>				
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INSULIN SYRINGES - BD			•	
LANCETS – BAYER FINGERSTIX, MICROLET, SINGLE-LET				
LANCETS – BD MICROTAINER, ULTRAFINE				
LANCETS – ROCHE ACCU-CHEK FASTCLIX, MULTICLIX, SOFT TOUCH, SOFTCLIX				
TEST STRIPS – BAYER ASCENSIA AUTODISC, BREEZE 2, CONTOUR, CONTOUR NEXT			•	
TEST STRIPS – ROCHE ACCU-CHEK ACTIVE, AVIVA, AVIVA PLUS, COMFORT CURVE, COMPACT, SMARTVIEW			•	
TEST STRIPS – ROCHE ACCUTREND			•	
<b>MEDICAL DEVICES</b>				
BREATHERITE				
<b>MISCELLANEOUS DRUGS</b>				
<b>azathioprine</b> (Imuran – brand is NP)				
CELLCEPT oral susp				
CHEMET				
CUPRIMINE	•			
<b>cyclosporine</b> (Sandimmune – brand is NP)				

Drug Name	Specialty	Prior Authorization	Dispensing Limits	Step Therapy
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CYCLOSPORINE MODIFIED caps, 50 mg				
<b>mycophenolate mofetil</b> (Cellcept caps, tabs – brand is NP)				
MYFORTIC				
RAPAMUNE				
REVLIMID	•	•		
<b>sodium polystyrene sulfonate</b>				
<b>tacrolimus</b> (Prograf – brand is NP)				
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ZORTRESS				

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<b>neomycin/polymyxin B/gramicidin eye soln</b> .....	15	<b>oxybutynin</b> .....	9
<b>neomycin/polymyxin B/hydrocortisone ear soln,</b>		<b>oxybutynin ext-release</b> .....	9
<b>susp</b> .....	16	<b>oxycodone</b> .....	12
<b>neomycin sulfate</b> .....	1	<b>oxycodone/acetaminophen</b> .....	12
<b>NEULASTA</b> .....	14	<b>oxycodone/aspirin</b> .....	12
<b>NEUPOGEN</b> .....	14	<b>oxycodone caps, conc, soln</b> .....	12
<b>nevirapine tabs</b> .....	2	<b>OXYCONTIN</b> .....	12
<b>NEXAVAR</b> .....	3	<b>P</b>	
<b>NEXIUM</b> .....	9	<b>pantoprazole delayed-release</b> .....	9
<b>niacin ext-release</b> .....	7	<b>paricalcitol</b> .....	5
<b>NICOTROL INHALER</b> .....	11	<b>paromomycin</b> .....	1
<b>NICOTROL NS</b> .....	11	<b>paroxetine hcl</b> .....	10
<b>nifedipine ext-release</b> .....	6	<b>paroxetine hcl ext-release</b> .....	10
<b>NILANDRON</b> .....	3	<b>PATADAY</b> .....	16
<b>nitrofurantoin</b> .....	9	<b>pediatric multivitamins</b> .....	14
<b>nitrofurantoin macrocrystalline</b> .....	9	<b>pediatric vitamins ADC</b> .....	14
<b>nitrofurantoin monohydrate/macrocrystalline</b> .....	9	<b>PEGASYS</b> .....	2
<b>nitroglycerin</b> .....	6	<b>PEG – electrolytes for soln</b> .....	8
<b>NITROSTAT</b> .....	6	<b>penicillin v potassium</b> .....	1
<b>norethindrone acetate</b> .....	4	<b>PENTASA</b> .....	9
<b>nortriptyline caps</b> .....	10	<b>pentoxifylline ext-release</b> .....	14
<b>NORVIR</b> .....	2	<b>perindopril</b> .....	6
<b>NOVOLIN 70/30</b> .....	5	<b>permethrin</b> .....	17
<b>NOVOLIN N</b> .....	5		

perphenazine.....	10	PROTOPIC.....	17
phenelzine.....	10	PULMOZYME.....	8
phenobarbital, soln; tabs, 16.2 mg, 32.4 mg.....	11	pyrazinamide.....	1
phenytoin chew tabs.....	13	pyridostigmine.....	13
phenytoin sodium ext-release.....	13	<b>Q</b>	
phenytoin susp.....	13	quetiapine.....	10
pilocarpine.....	16	quinapril.....	6
pilocarpine eye soln.....	15	quinapril/hydrochlorothiazide.....	6
pioglitazone.....	4	quinidine gluconate ext-release.....	7
pioglitazone/metformin.....	5	quinidine sulfate, NP = ext-release.....	7
piroxicam.....	12	QVAR.....	8
podofilox.....	17	<b>R</b>	
polymyxin B/trimethoprim eye soln.....	15	ramipril.....	6
potassium bicarbonate/chloride effervescent tabs, 25 mEq.....	14	ranitidine.....	9
potassium chloride ext-release.....	14	RAPAMUNE.....	18
potassium chloride ext-release caps.....	14	REBIF.....	11
potassium chloride packets; soln, 10%.....	14	RECOMBINATE.....	14
POTASSIUM CITRATE.....	10	repaglinide.....	5
potassium citrate/citric acid powder.....	10	REPRONEX.....	4
potassium phosphate/sodium phosphates.....	14	RESCRIPTOR.....	2
pramipexole.....	13	REVLIMID.....	18
PRANDIN.....	5	REYATAZ.....	2
pravastatin.....	7	ribavirin.....	2
prazosin.....	7	rifampin.....	1
prednisolone.....	3	riluzole.....	13
prednisolone acetate eye susp.....	15	risperidone.....	11
PREDNISOLONE SODIUM PHOSPHATE eye soln, 1%.....	15	rivastigmine caps.....	11
prednisolone sodium soln.....	3	RIXUBIS.....	14
PREDNISONE INTENSOL.....	4	rizatriptan.....	12
PREDNISONE soln, 5 mg/5 mL; tabs, 50 mg.....	3	ropinirole.....	13
prednisone tabs, 1 mg, 2.5 mg, 5 mg, 10 mg, 20 mg...	4	<b>S</b>	
PRENAPLUS.....	14	SABRIL.....	13
PRENATABS FA.....	14	salsalate.....	11
PRENATAL 19, PRENATAL LOW IRON, PRENATAL PLUS.....	14	selegiline caps.....	13
PRENATAL VITAMINS PLUS.....	14	selegiline tabs.....	13
PREZISTA.....	2	selenium sulfide.....	17
PRIFTIN.....	1	SELZENTRY.....	2
PRIMAQUINE.....	2	SE-NATAL 19.....	14
primidone.....	13	SENSIPAR.....	5
PROAIR HFA.....	8	SEROQUEL XR.....	11
probenecid.....	12	sertraline.....	10
probenecid/colchicine.....	13	sildenafil.....	7
prochlorperazine.....	10	silver sulfadiazine.....	16
PROCRIT.....	14	SIMBRINZA.....	15
PROFILNINE SD.....	14	simvastatin.....	7
progesterone micronized.....	4	SKYLA.....	4
promethazine, NP = supp, 50 mg.....	8	sodium citrate/citric acid.....	10
propafenone.....	7	sodium polystyrene sulfonate.....	18
propafenone ext-release.....	7	SOLARAZE.....	17
propranolol ext-release.....	6	SORIATANE.....	17
PROPRANOLOL soln.....	6	sotalol.....	7
propranolol tabs.....	6	SPIRIVA HANDIHALER.....	8
propylthiouracil.....	5	spironolactone.....	7



<b>spironolactone/hydrochlorothiazide</b> .....	7
SPRYCEL.....	3
<b>stavudine</b> .....	2
STIMATE.....	5
STRIBILD.....	2
STROMECTOL.....	2
SUBOXONE film.....	12
<b>sucralfate</b> .....	9
<b>sulfacetamide sodium</b> .....	16
<b>sulfacetamide sodium/prednisolone eye soln</b> .....	15
<b>sulfacetamide sodium/sulfur, NP = susp, 10-5%</b> .....	16
<b>sulfacetamide sodium eye soln</b> .....	15
<b>sulfamethoxazole/trimethoprim</b> .....	3
<b>sulfasalazine</b> .....	9
<b>sulfasalazine delayed-release</b> .....	9
<b>sulindac</b> .....	12
<b>sumatriptan inj, tabs</b> .....	12
SUPRAX tabs.....	1
SUSTIVA.....	2
SUTENT.....	3
SYLATRON.....	3
SYMBICORT.....	8
<b>T</b>	
TABLOID.....	3
<b>tacrolimus</b> .....	18
TAFINLAR.....	3
<b>tamoxifen</b> .....	3
<b>tamsulosin</b> .....	10
TARCEVA.....	3
TASIGNA.....	3
TAZORAC.....	16
TECFIDERA.....	11
TEGRETOL-XR 100 mg.....	13
<b>temazepam</b> .....	11
TEMODAR.....	3
<b>temozolomide</b> .....	3
<b>terazosin</b> .....	7
<b>terbinafine</b> .....	1
<b>terbutaline</b> .....	8
<b>terconazole</b> .....	9
<b>testosterone cypionate</b> .....	4
<b>testosterone enanthate</b> .....	4
TEST STRIPS – BAYER ASCENSIA AUTODISC, BREEZE 2, CONTOUR, CONTOUR NEXT.....	17
TEST STRIPS – ROCHE ACCU-CHEK ACTIVE, AVIVA, AVIVA PLUS, COMFORT CURVE, COMPACT, SMARTVIEW.....	17
TEST STRIPS – ROCHE ACCUTREND.....	17
THALOMID.....	18
<b>theophylline ext-release</b> .....	8
<b>thiothixene</b> .....	11
<b>timolol maleate eye soln</b> .....	15
TIMOLOL tabs.....	6
TIVICAY.....	2
<b>tizanidine</b> .....	13

TOBI, NP = Podhaler.....	1
TOBRADEX eye oint.....	15
<b>tobramycin/dexamethasone eye susp</b> .....	15
<b>tobramycin eye soln</b> .....	15
<b>tolterodine</b> .....	9
<b>topiramate</b> .....	13
<b>torsemide</b> .....	7
TRACLEER.....	7
<b>tramadol</b> .....	12
<b>tramadol/acetaminophen</b> .....	12
<b>trandolapril</b> .....	6
<b>tranylcypromine</b> .....	10
TRAVATAN Z.....	15
<b>trazodone</b> .....	10
<b>tretinoin</b> .....	16
<b>tretinoin caps</b> .....	3
<b>tretinoin microsphere</b> .....	16
TREXALL.....	3
<b>triamcinolone</b> .....	8
<b>triamcinolone crm; lotn; oint, 0.025%, 0.1%</b> .....	17
<b>triamcinolone dental paste</b> .....	16
<b>triamterene/hydrochlorothiazide</b> .....	7
<b>trifluoperazine</b> .....	11
<b>trifluridine eye soln</b> .....	15
<b>trihexyphenidyl</b> .....	13
TRILIPIX.....	7
<b>trimethobenzamide</b> .....	9
<b>trimethoprim</b> .....	3
TRIZIVIR.....	2
<b>tropicamide eye soln</b> .....	16
TRUVADA.....	2
<b>U</b>	
<b>ursodiol</b> .....	9
<b>V</b>	
VAGIFEM.....	9
<b>valacyclovir</b> .....	2
VALCYTE.....	2
<b>valproic acid</b> .....	13
<b>valsartan/hydrochlorothiazide</b> .....	6
<b>vancomycin</b> .....	3
<b>venlafaxine</b> .....	10
<b>venlafaxine ext-release caps</b> .....	10
<b>venlafaxine ext-release tabs, NP = 225 mg</b> .....	10
VENTOLIN HFA.....	8
<b>verapamil, NP = 40 mg</b> .....	6
<b>verapamil ext-release</b> .....	6
VESICARE.....	9
VFEND susp.....	1
VICTOZA.....	5
VICTRELIS.....	2
VIDEX.....	2
VIGAMOX.....	15
VIRACEPT.....	2
VIRAMUNE susp.....	2

VIRAMUNE XR.....	2
VIREAD.....	2
VOLTAREN.....	17
<b>voriconazole</b> .....	1
VOTRIENT.....	3
VYVANSE.....	11

## W

<b>warfarin</b> .....	14
WELCHOL.....	7
WILATE.....	14

## X

XALKORI.....	3
XARELTO.....	14
XELODA.....	3
XERAC AC.....	17
XIFAXAN 550 mg.....	3
XYNTHA.....	14
XYNTHA SOLOFUSE.....	14

## Y

## Z

<b>zafirlukast</b> .....	8
<b>zaleplon</b> .....	11
ZELBORAF.....	3
ZEMPLAR.....	5
ZENPEP.....	9
ZIAGEN soln.....	2
<b>zidovudine</b> .....	2
<b>ziprasidone</b> .....	11
ZITHROMAX packets.....	1
<b>zolpidem</b> .....	11
<b>zolpidem ext-release</b> .....	11
<b>zonisamide</b> .....	13
ZORTRESS.....	18
ZYCLARA.....	17
ZYCLARA PUMP.....	17
ZYLET.....	15
ZYTIGA.....	3
ZYVOX.....	3

**Section 215: Publicity of Records**

All books, records and accounts of every office and Department of the City shall be open to inspection by any citizen at all reasonable times and under reasonable regulations established by the Council, except such records and documents the disclosure of which would tend to defeat the lawful purpose which they are intended to accomplish.

**Section 216: Copies of Records**

Copies or extracts, duly certified, from said books and records open for inspection, shall be given by the officer having the same in custody to any person demanding the same who shall be charged for such copies or extracts, and for certification, the charge to be fixed by the Council.

**Section 216.1: Access to Government Information**

(a) The people have the right to instruct their representatives, petition government for redress of grievances, and assemble freely to consult for the common good.

(b) (1) The people have the right of access to information concerning the conduct of the people's business, and therefore, the meetings of public bodies and the writings of public officials and agencies shall be open to public scrutiny.

(2) A statute, court rule, or other authority, including those in effect on the effective date of this Section, shall be broadly construed if it furthers the **City of San Diego City Charter Article XIV** Page 3 of 6

people's right of access, and narrowly construed if it limits the right of access. A statute, court rule or other authority adopted after the effective date of this Section that limits the right of access shall be adopted with findings demonstrating the interest protected by the limitation and the need for protecting that interest.

(3) Nothing in this Section supersedes or modifies the right of privacy guaranteed by Section 1 of the California Constitution or affects the construction of any statute, court rule, or other authority to the extent that it protects that right to privacy, including any statutory procedures governing discovery or disclosure of information concerning the official performance or professional qualifications of a peace officer.

(4) Nothing in this Section supersedes or modifies any provision of this Charter or the California Constitution, including the guarantees that a person may not be deprived of life, liberty or property without due process of law, or denied equal protection of the laws.

(5) This Section does not repeal or nullify, expressly or by implication, any constitutional or statutory exception to the right of access to public records or meetings of public bodies that is in effect on the effective date of this Section, including, but not limited to, any statute protecting the confidentiality of law enforcement and prosecution records.

*(Addition voted 11-02-2004; effective 01-21-2005.)*

## **Public Utilities**





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## Department Description

Public Utilities is composed of four branches: Business Support, Water Quality, Distribution and Collection, and Potable Reuse and Strategic Programs. Each branch performs distinct functions as outlined below.

The Business Support Branch is comprised of the following divisions:

**Long-Range Planning and Water Resources** - This division provides long-range water resources planning and development, watershed and resource protection, water and wastewater legislation and policy analysis, and management of the City's recycled water and water conservation programs. The Division is also responsible for the management of follow-on work associated with the Water Purification Demonstration Project and Recycled Water Study. The follow-on work consists of a comprehensive look at examining potable reuse to provide a safe and reliable water source for the City's future.

**Finance and Information Technology** - This division provides administrative support for the Water and Wastewater Enterprise Funds including Information Systems, Budget Development and Monitoring, Accounts Payable, Rate Setting and Finance, and the Administration of Contracts, Grants, and State Revolving Fund (SRF) Loans.

**Customer Support** - This division provides high-quality customer-focused care and service to Public Utility Department patrons. The Division handles and responds to customer phone calls and emails, including account/billing inquiries, water conservation information, water waste complaints, and general water/sewer utility information. In addition, the Division is responsible for customer billing and payment processing, meter reading and code enforcement, customer compliance with State backflow device requirements, and providing public information.

The Water Quality Branch is comprised of the following divisions:

**Wastewater Treatment and Disposal** - This division operates and maintains a wastewater treatment plant, two water reclamation plants, a bio-solids processing facility, and eight large wastewater pump stations. With these facilities, the Division provides regional wastewater treatment and disposal services to the City of San Diego, as well as 12 surrounding cities and special districts.

**Water System Operations** - This division operates and maintains the City's raw water supply system, potable water treatment and distribution system, and the recycled water distribution system. This division also manages the

# Public Utilities

recreational program at the City's raw water reservoirs (lakes). Major facilities include nine raw water reservoirs (lakes), three water treatment plants, a recycled water distribution system with four pump stations and three reservoirs/tanks, and a complex and vast potable water distribution system with over 130 pressure zones, 49 pump stations, 29 tanks/reservoirs, and more than 950 pressure regulators. In addition, the Division provides corrosion engineering support and water supply operations management for the Department.

**Environmental Monitoring and Technical Services** - This division manages regulatory permits and provides permit compliance and monitoring services for the Water and Wastewater Systems and various treatment facilities to ensure that air and water quality standards are maintained to meet regulatory and environmental standards. Specifically, the Division provides various types of biological, chemical, and toxicological testing in the field and laboratory to fully monitor and assess the quality of the region's drinking water, wastewater, and residuals systems. The Division also conducts a comprehensive ocean monitoring program to assess the impact of wastewater discharge to San Diego's coastal ocean waters. Division staff also provides consultative scientific and technical assistance for the Department. The Division also includes the Industrial Wastewater Control Program (IWCP) which regulates industrial and commercial discharges to the sewer system to minimize toxic loadings and other incompatible discharges in order to maximize opportunities for beneficial reuse of wastewater and bio-solids. The IWCP issues permits that apply federal pre-treatment standards and plant-specific local discharge limits and performs facility inspections, sampling, and analysis of industrial waste streams to determine compliance with permit limits. The Program also develops commercial and industrial sewer billing rates for large users in compliance with State revenue guidelines.

The Collection and Distribution Branch is comprised of the following divisions:

**Wastewater Collection** - This division provides efficient operations and maintenance of the wastewater collection system, which consists of 3,019 miles of sewer mains and 75 sewer pump stations, as well as the Mission Bay and Coastal Low-Flow System consisting of 24 interceptor pump stations and 50 diversion structures. The Division also administers the Food Establishment Wastewater Discharge Permitting Program which permits and monitors over 5,000 food establishments to minimize the discharge of fats, oils, and grease into the wastewater collection system.

**Water Construction and Maintenance** - This division provides construction, maintenance, and emergency response for the potable water system. The Division maintains approximately 279,412 metered service connections, approximately 25,157 fire hydrants, and more than 28,917 isolation valves. The Division performs construction activities for the recycled distribution system citywide and provides 24-hour emergency response, water main repair, Capital Improvement Program (CIP) support, and the maintenance, installation, and replacement of water meters throughout the City.

The Strategic Programs Branch responsibilities are as follows:

**Employee Services and Quality Assurance** - This division provides employee and management services in the areas of human resources management, payroll, safety, security, training, and quality assurance. It also provides administrative support to the Independent Rates Oversight Committee and is involved in various internal business support services including contract formulation and administration, internal quality assurance audit support, management of Public Records Act requests, and records management.

**Asset Management** - This section coordinates Department activities that contribute to a unified methodology for asset management providing oversight, direction, and integration of activities to promote Public Utilities' goal of providing cost-effective water, recycled water, and wastewater services. The Section is responsible for the management of the Department's GIS system and data, as well as leading the implementation of an SAP-based Enterprise Asset Management system.

**Strategic Support Services** - This section coordinates the development of the Public Utilities Department five-year strategic business plan and coordinates the development and tracking of the annual strategic initiatives throughout the Department. Quarterly progress reports are coordinated and a final report is published for stakeholders and ratepayers. This team assists with, and tracks progress on, various consolidation and efficiency initiatives throughout

# Public Utilities

the Department. Progress reports are coordinated and a final report is published for stakeholders and ratepayers. The Section also conducts benchmarking studies for the Department and administers a Leadership Development Program and an Employee Opinion Survey to all Public Utilities employees.

The Potable Reuse and Strategic Programs Branch is comprised of the following divisions and responsibilities:

**Engineering and Program Management** - This division provides engineering services for Water, Wastewater, and Reclaimed Water Systems to ensure new facilities, repairs, and upgrades are planned and implemented in a fiscally sound manner to meet regulatory and environmental standards. The Division also provides long-range master planning, condition assessment, water and sewer modeling, planning and pre-design for infrastructure, energy management, environmental support, and oversight of the implementation of the Water, Wastewater, and Reclaimed Water System's Capital Improvement Program.

**Pure Water Program** - The Pure Water Program is a focused and coordinated effort to develop and execute a full-scale potable reuse implementation plan and to identify a permanent solution to the Point Loma Wastewater Treatment Plant Modified Permit. The Program will draw upon staffing and resources from throughout the Department.

## Oversight

The Independent Rates Oversight Committee (IROC) was established by ordinance in 2007 to serve as an official advisory body to the Mayor, City Council, and department management on policy issues related to the oversight of Public Utilities Department operations including, but not limited to, rate structures, cost effectiveness, resource management, planned expenditures, service delivery methods, public awareness and outreach efforts, and efforts to achieve high-quality, affordable utility services.

There are 11 voting members on the IROC, all of whom are appointed by the Mayor and confirmed by the City Council. The membership of IROC consists of representatives of each rate class and professional experts in such fields as finance, engineering, construction, and the environment. IROC meets monthly to review budgets, expenditures, performance activities, and issues for the Public Utilities Department. In addition, IROC has three subcommittees focused on finance, infrastructure and operations, as well as outreach and communication.

The Department's mission is:

*To ensure quality, reliability, and sustainability of water, wastewater, and recycled water services for the benefit of the ratepayers and citizens served*

## Goals and Objectives

The following goals and initiatives represent the Public Utilities Department's Fiscal Year 2014 Strategic Plan:

### ***Goal 1: Safe, reliable and efficient, water, wastewater, and recycled water services***

The Public Utilities Department is dedicated to its public health responsibilities of providing safe and reliable water and efficient wastewater and recycled water services. The Department strives to exceed all federal and State water quality standards, maintain and build needed infrastructure, and deliver water and wastewater services to customers efficiently and reliably. The Department will move toward accomplishing this goal by focusing on the following initiatives:

- Enterprise Asset Management (EAM) Project: Develop a user-friendly SAP Enterprise Asset Management consultant-assisted solution
- Condition Assessments: Complete major milestones included in the Asbestos Cement Water Mains Condition Assessment contract
- Accelerated Repair Program: Initiate an accelerated repair for distribution system water mains identified by the EPM Division using in-house resources

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- Risk-Based Value Maintenance: Initiate a risk-based valve maintenance program to determine the maintenance schedule of every asset based on analysis of asset purpose, risk of failure, etc.
- Facility Vulnerability: Assess, update, and implement the Emergency Response Plan and security plans
- San Diego Metropolitan Sewerage System Strategy: Develop a strategy on all elements of the proposed future system-wide operations to meet permitting requirements

## ***Goal 2: Fiscally sound and effective public utility***

The Public Utilities Department utilizes strategic financial planning to ensure financial viability to operate and maintain the water and wastewater systems. The Department provides a fiscally sound, efficient organization that is responsive and dependable enhancing its long-term viability, accountability, ethics, and transparency as cornerstones upon which to build trust with customers. The Department will move toward accomplishing this goal by focusing on the following initiatives:

- Inter/Intra-Divisional Collaboration: Promote an employee service-oriented culture throughout the Department marked by increased cooperation and collaboration
- Customer Survey: Enhance the customer survey program and feedback process
- Public Education: Educate the public/stakeholders on the value of water, as well as the Department's efforts to reduce internal costs
- Optimize Production of Treatment Plants: Reduce per unit treatment costs by finding new markets
- Increased Transparency: Develop and implement strategies and approaches that enhance transparency and accountability to customers and stakeholders
- Game Changers: Evaluate the financial impact of "game changers" (e.g. Indirect Potable Reuse, Desalination, Point Loma)
- Cost Recovery Fees: Improve fee-based cost recovery

## ***Goal 3: Sustainable growth and economic viability***

The Department recognizes that water supplies are critical to preserving the quality of life, economic prosperity, and growth of the City. The Department identifies, evaluates, and plans short and long-term water demand and supply reliability options. The Department will move toward accomplishing this goal by focusing on the following initiatives:

- Complete Potable Reuse (PR) Implementation Studies: Complete PR Implementation studies on such areas as engineering, site, financing, cost allocation, resource allocation, etc.
- Effectively engage in legislative and regulatory arenas in order to promote the viability of Potable Reuse (PR) in San Diego and statewide
- Renewable Energy Initiatives Expansion: Reduce energy commodity consumption, peak demand, and greenhouse gas emissions; increase renewable energy production; and support the Mayor's Solar Energy Initiative
- Seawater Desalination Rate Structure: Pursue fair and equitable desalination rate allocation
- Pursue a rate structure that encourages conservation

## ***Goal 4: Responsive, safe, committed, and innovative workforce***

The Public Utilities Department is proud of its professional, technically proficient, and diverse workforce. The Department is dedicated to ensuring its employees have the training and equipment necessary to provide safe, reliable water, wastewater, and recycled services in a customer-friendly manner. The Department will continue to meet its goal of being a service-oriented and innovative utility through strategic workforce planning and by providing employees the knowledge, skills, and abilities necessary to perform their jobs safely. The Department will move toward accomplishing this goal by focusing on the following initiatives:

- Wellness Program: Develop a department-wide Wellness Program
- Efficiency/Effectiveness Studies: Conduct new and implement prior efficiency studies and develop a Process Narrative to document the process
- Knowledge Management: Engage in knowledge management and depth-building for at-risk positions with retirements on horizon
- Expedite Hiring: Expedite hiring for high turnover positions



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- Leadership Development Program (LDP) Reinforcement: Provide continuing education opportunities to LDP alumni and foster a culture that supports application of Academy content

## Key Performance Indicators

Performance Measure	Actual FY2013	Estimated FY2014	Target FY2015
1. Average number of days to respond to and resolve customer-initiated service investigations <sup>1</sup>	18.3	11.2	10.0
2. Miles of sewer mains replaced, repaired, and rehabilitated	52 <sup>2</sup>	45	45
3. Miles of water mains replaced <sup>3</sup>	22.9	23.0	28.0
4. Number of Primary Maximum Contaminant Level (MCL) violations as a result of potable water quality sampling	0	0	0
5. Number of sanitary sewer overflows (SSOs)	42	42	40
6. Number of water main breaks	111	83 <sup>4</sup>	108
7. Number of acute sewer main defects identified	45	48	48
8. Average time to repair identified acute sewer main defects (days)	33	25 <sup>5</sup>	25
9. Average time to repair water main breaks (hours)	9.0	9.0	9.0
10. Average daily water production (millions of gallons)	182	175.6	178.2
11. Number of recycled water use site inspections and shutdown tests conducted <sup>6</sup>	1,306	1,750	1,900
12. All legal and financial covenants maintained	Yes	Yes	Yes
13. All required reporting for bonds and loans completed on time	Yes	Yes	Yes

1. Reduction from Fiscal Year 2013 to Fiscal Year 2014 due to implementation of work process improvements that enhanced efficiency. Target for Fiscal Year 2015 reflects commitment to continuous improvement.
2. Fiscal Year 2013 total includes several trunk sewers that the department was accelerating to meet EPA Consent Decree deadlines. The target continues to be 45 miles per year.
3. Reflects miles of water main awarded consistent with the requirements under the Department of Public Health Compliance Order
4. The number of breaks is unpredictable. Fiscal Year 2015 target is based on 3-year average from Fiscal Year 2011-2013. Fiscal Year 2014 estimated is based on actuals through December 31, 2013
5. Reduction from Fiscal Year 2013 due to Department's efforts to prioritize and quickly respond to defects.
6. The number of inspections increases along with the increase in the number of recycled water use sites. Additionally, there has been an increased focus on random inspections.

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## Service Efforts and Accomplishments

### Asset Management

The Asset Management Program continued to work on transformational projects for the Department. The SAP Enterprise Asset Management (EAM) project management office has developed the citywide scope and budget for the fully integrated citywide project which received Independent Rates Oversight Committee and City Council Infrastructure Committee approval. The project management office has begun development of the Request for Proposal for the System Integrator. This SAP EAM system will replace legacy maintenance management systems and provide the Department with a consolidated and integrated software tool to maximize the efficient management of infrastructure through its full lifecycle. The project duration is three to four years. The Asset Management Program also completed assessment of the current usage of Geographical Information Systems (GIS) in the Department. This assessment includes a roadmap for the replacement of the existing GIS with the ESRI platform. The Program has also begun development of data management standards for the delivery of Condition Assessment data in support of the Department's Condition Assessment projects.

### Strategic Support Services

The Strategic Support Services Section coordinated the development of the Public Utilities Department Fiscal Year 2014 strategic planning process and monitoring of Fiscal Year 2013 Strategic Initiatives. This section conducted and coordinated Department benchmarking efforts and efficiency studies, managed a Leadership Development Program, and administered an Employee Opinion Survey to all Public Utilities employees.

### Long-Range Planning and Water Resources

**Water Conservation.** The Water Conservation Section provides commercial and residential customer rebates through its "Outdoor Water Conservation Rebates" grant project. This grant provides eligible customers with three different rebates to promote outdoor water conservation: Smart Controllers, Micro-Irrigation, and Sustainable Landscape-Turf Replacement. The ongoing goal is to conserve potable water while also reducing pollutant-laden dry weather urban runoff flows into streams, rivers, bays, etc. Through December 2013, the grant project issued 722 rebates totaling \$669,643 for smart controllers and micro-irrigation systems, as well as the replacement of high water-use turf areas with sustainable low water-use landscapes. Water savings generated from this program is estimated to be more than 15 million gallons per year.

The Water Conservation Section is continuing its partnership with the Storm Water Division on a rain barrel rebate program. Rain barrels capture and store rainfall for later use when connected to a roof downspout. Temporarily storing rainwater in rain barrels reduces storm water runoff and conserves potable water. Every 1,000 square feet of roof surface captures approximately 625 gallons of water for every inch of rain that falls. Through December 2013, the Water Conservation Section has rebated 379 rain barrels with an average size of 163 gallons for a total rebate amount of \$62,449.

**Water Planning.** In April 2013, the City Council unanimously adopted the Water Purification Demonstration Project (Demonstration Project) report. The key finding was that water purification is a feasible local water supply. Council's direction to staff was to determine a preferred implementation plan and schedule that considers water purification options for maximizing local water supply and reducing flows to Point Loma. The 2012 Recycled Water Study presented high-level concepts for achieving over 80 million gallons per day (mgd) of potable reuse. Those concepts were drawn upon as the starting point for developing an implementation plan. In Fiscal Year 2014, staff sought to refine them through the completion of:

1. Detailed studies of proposed advanced water purification sites and associated wastewater treatment facilities. The Recycled Water Study identified three possible sites for wastewater treatment and advanced water purification facilities. They include sites that are adjacent to the existing North City and South Bay Water Reclamation Plants (North City and South Bay), and the Harbor Drive site which is adjacent to the airport and Pump Station 2. Pump Station 2 conveys all of the flow that is eventually treated at the Point Loma Wastewater Treatment Plant. The studies determined that all three proposed sites can accommodate facilities of this scale.

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2. Updated reuse facility costs and schedule. Findings from the above facility site studies were used to update the cost estimates and schedules originally developed during the 2012 Recycled Water Study.

Both the Demonstration Project and the Recycled Water Study considered only *indirect* potable reuse (IPR) wherein purified water would be retained in an environmental buffer before being conveyed to one of the City's water treatment plants. Interest in direct potable reuse (DPR) is growing throughout the state, and the California Department of Public Health is due to report on the feasibility of establishing DPR regulations by the end of 2016. As such, the Department completed the following in Fiscal Year 2014 related to DPR planning:

1. Evaluated the facilities needed to support DPR and their estimated cost.
2. Installed additional treatment equipment at the Advanced Water Purification Facility (AWPF). Approximately \$1.0 million worth of additional treatment equipment was installed to support grant-funded research of DPR treatment strategies. This research is evaluating the effectiveness of additional *treatment* steps that could compensate for the absence of a reservoir buffer. The research will be completed in Fiscal Year 2015.

The Department met with stakeholders from both the environmental community and the Metropolitan Participating Agencies (Metro PAs), on several occasions during Fiscal Year 2014. Key topics of discussion included progress on the above studies and the integration of potable reuse planning into the Point Loma permit renewal application. The Department also worked closely with the Metro PAs to finalize the framework for allocating potable reuse costs between water and wastewater funding sources.

**Portable Reuse Outreach.** At the April 2013 City Council meeting, staff was directed to continue outreach activities initiated as part of the Demonstration Project. These activities included speaker bureau presentations, community events and partnerships, a facility tour program, written and electronic materials, and traditional and social media. The information provided through these outlets focused on the results of the yearlong Demonstration Project and the next steps associated with implementation of a full-scale water purification facility in San Diego.

Major Fiscal Year 2014 milestones included recognition for water purification efforts from four prominent industry organizations. On September 18, 2013 the Planning and Conservation League honored the Demonstration Project with the Dorothy Green Water Award for its groundbreaking work in water purification. On November 5, 2013 the Industrial Environmental Association awarded the Department with an Environmental Excellence Award for its accomplishments in sustainability. On November 6, 2013 the American Water Resources Association awarded Deputy Director Marsi A. Steirer with the Mary H. Marsh Medal for Exemplary Contributions to the Protection and Wise Use of the Nation's Water Resources. On December 4, the Association of California Water Agencies awarded the outreach team with the Huell Howser Best in Blue award for achieving excellence in communications.

**Recycled Water Program.** Recycled water meter connections reached 581 (576 retail and 5 wholesale) by December 2013, a gain of 24 new meters in the past 12 months. In cooperation with the Park & Recreation Department, the team completed a large irrigation retrofit of Westview Park resulting in an estimated potable water savings of 13 acre feet per year. Forty-five percent of the retrofit costs were covered by federal and State grant funds resulting in project cost savings of over \$100,000.

By April 2014, the first of several remaining pipeline segments along the Highway 56 corridor, between Los Penasquitos and Carmel Valley, was completed. This first phase, along Camino Del Sur, will result in 30 new meter connections. Ultimately 70 to 100 new recycled water meter connections, along the Highway 56 corridor, are anticipated by the end of Fiscal Year 2015.

Sales of recycled water resulted in over \$2.8 million in financial savings toward imported water purchases in Fiscal Year 2014. These financial incentives are the result of local water resource development agreements with the Metropolitan Water District of Southern California and the San Diego County Water Authority.

**Water Reliability.** The Water Reliability Section completed the 2012 Long-Range Water Resources Plan (2012 Plan) and presented it to the City Council on December 10<sup>th</sup> 2013, obtaining unanimous approval. The Department

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convened an 11-member stakeholder committee that provided guidance and input on alternative strategies for meeting San Diego's water needs through 2035. The 2012 Plan addresses population growth, water resource diversification, climate change, and other issues affecting water reliability.

The Public Utilities Department successfully negotiated a settlement agreement with the Sweetwater Authority on August 23, 2013 that allows the Department to transfer up to 2,600 acre-feet of locally produced groundwater per year from their expanded brackish groundwater desalination facility. The Department is currently working with the Real Estate Assets Department to identify and acquire property in the South Bay to construct a pump station to transfer this water from Sweetwater's system to the City's system.

A three-year Biological and Groundwater Resource Monitoring Report of the Santee-El Monte Groundwater Basin was completed. The report establishes baseline conditions to facilitate future monitoring and management of biological and groundwater resources during operation of planned groundwater extraction operations in the basin.

***Watershed and Resources Protection Team.*** The Watershed and Resources Protection Team manages 41,000 acres of land surrounding the City's reservoirs for the overarching purpose of source water protection. Two land acquisitions have added to the source water protection: a 95 acre preserve at San Vicente Reservoir and a 120 acre preserve at El Capitan Reservoir, both straddling tributary streams, and each with an endowment for management in perpetuity.

The Team is working with SANDAG to develop a joint wetlands mitigation bank on 462 acres in San Pasqual Valley.

Working with partners and using State and local grant funding, the Team has three habitat restoration projects underway (two at Otay and one at Hodges Reservoirs) that will restore 220 riparian or wetland acres immediately adjacent to City reservoirs. The Upper Otay Riparian Restoration Project (101 acres), with \$1.4 million State grant funding, was approved by Council in December and is underway. Agreements were executed for \$1.0 million State grant funding of the 100-acre San Dieguito Riparian Restoration Project.

***Integrated Regional Water Management (IRWM) Program.*** The San Diego IRWM Program is co-managed by the San Diego County Water Authority (Water Authority), the County of San Diego (County) and the City of San Diego. Staff from both the Transportation and Storm Water Department (Storm Water Division) and Public Utilities Department (Long-Range Planning and Water Resources Division) participates in the overall management of the IRWM Program. Public Utilities has the lead administrative role on behalf of the City.

In Fiscal Year 2014, an updated IRWM Plan was adopted by City Council, the County's Board of Supervisors and the Water Authority's Board of Directors. This Plan sets the priorities for state IRWM grant funding. To date, the San Diego region has been awarded \$33.0 million in state grant funding for water management related projects, plus an additional \$1.0 million to update the 2007 IRWM Plan. Another \$10.0 million award to the San Diego IRWM Program is currently being reviewed by DWR. The City of San Diego has been awarded, or is pending award of, \$14.0 million of the \$43.0 million IRWM grant funding made available to the region to date.

## Financial and Information Technology

This year, the IT Program led the implementation of a new Enterprise Daily Operations Reporting System which contains plant operational data from the Distributed Control System and Laboratory Information System. The IT Program, in conjunction with the Budget Section, developed and implemented the Vendor Invoice Tracking System (VITS), which routes and tracks accounts payable vouchers in order to streamline the invoice payment process. The IT Program is partnering with the Department Asset Management Program to have a GIS assessment performed to summarize the current GIS usage and requirements and develop a roadmap to migrate to the City standard, ESRI.

The Budget Section continues to provide service to other Public Utilities Department divisions and programs, as well as the Independent Rates Oversight Committee and Finance Sub-committee. The Section has refined financial reporting practices, and continually monitors the budget to identify budgetary savings. The Section also developed

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Five-Year Operation and Maintenance projections and assisted in development of CIP cash flow projections in support of the Water and Wastewater Cost of Service Studies. The Accounts Payable group continues to implement process improvements and efficiencies in order to enhance customer service and improve the Department's on-time payment percentage, which reached 93 percent in January 2014, exceeding of the citywide target of 80 percent.

In Fiscal Year 2015, the Grants & Loans Section will focus their efforts on the pursuit of new grant funding opportunities to maximize possible award amounts for the Advanced Metering Infrastructure, Indirect Potable Reuse, Recycled Water, and Turf Replacement Rebate projects. In addition, the Section plans to begin conducting administrative monitoring tasks for over \$120.0 million in new State Revolving Fund (SRF) Loans for the following Water and Wastewater projects: \$6.2 million for Sewer Pipeline Replacement Segment W-1, \$18.7 million for University Avenue Pipeline Replacement, \$64.0 million for Alvarado 2<sup>nd</sup> Extension Pipeline & Morena Boulevard Cast Iron Replacement project, and \$31.2 million for Pump Station 2 Power Reliability & Surge Protection. The Section also anticipates receiving SRF Loan reimbursements for all 4 Metropolitan Biosolids Center projects (Storage Silos, Chemical System Implementation Phase 2, Odor Control Facility Upgrades and Dewatering Centrifuge Replacement) totaling approximately \$26.0 million.

In Fiscal Year 2014, the Rates & Finance Section completed the water system Cost of Service Study (COSS) and received Council approval to raise water rates by 7.25 percent effective January 1, 2014, and 7.5 percent effective January 1, 2015. In addition to raising rates, Council also adopted a four tier rate structure for Single-Family Residential customers to incentivize conservation. The Wastewater system COSS is expected to be completed in Fiscal Year 2015.

## **Customer Support**

The Customer Support Division responded to more than 351,000 water and sewer utility customer phone calls in the past year. Customer contacts included inquiries regarding customer billing and payment, service turn-on/turn-off, emergency services and repairs, water conservation, and general utility service questions. The Division also produced and sent 1.8 million water/sewer utility bills and processed 1.7 million customer payments totaling \$788.2 million.

The Division read more than 285,000 monthly/bi-monthly water meters, performed 55,000 shut-offs and service restorations, and continued rigorous efforts to protect the public water system by adding approximately 1,000 privately maintained backflow devices to its monitoring and annual testing.

The Division opened a new downtown walk-in payment center in October 2013 and added approximately 60 third-party payment locations, including Walmart and K-Mart stores, distributed throughout San Diego County in December 2013. The new locations provide customers additional convenience and faster more efficient processing of related payments. In early Fiscal Year 2015, the Division will be expanding customer call center hours to include evenings/weekends and completing the transition to a more proactive service delivery model.

The Department is streamlining meter reading and customer service operations, reducing non-revenue water and enhancing customer service by obtaining near real-time wireless electronic access to water meter information using Advanced Metering Infrastructure (AMI) technology. The AMI implementation underway includes approximately 11,500 of the total meter population, including all monthly read meters and bimonthly read meters in one pressure zone. Large meters that can no longer be maintained reliably are being replaced with newer meters fitted with AMI compatible registers. Once implemented, the Department can continue adding new devices in a steady, cost-effective manner. This project is scheduled to be completed by October 2014.

## **Employee Services and Quality Assurance**

The Human Resources team continued to support and lead the Department in four major service areas: performance management, employee health and wellness, hiring, and payroll. This section also implemented improvements to the departmental occupational health management program so that injured employees were transitioned back to productive work appropriately and expeditiously.

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The Training Section was awarded reaccreditation status by the International Association for Continuing Education and Training (IACCET). This status allows the Public Utilities Department to offer continuing education units (CEU's) for all department employees who maintain professional certifications.

The Quality Assurance Section coordinated Department responses to the "Public Utilities Department's Valve Maintenance Program" and the "Public Utilities Department's Industrial Waste and Control Program" audits which were performed by the Office of the City Auditor. This section continues to track and monitor audit recommendations from these, as well as previous, internal and external audits to ensure recommendations are satisfied and implemented in a timely manner. This section also continues to support the Independent Rates Oversight Committee through meeting preparation, coordination of information requests, and facilitating the interface of the Committee and the City.

The Security Section began installation and implementation of a new security access system, which will eventually provide for centralized access control and monitoring of all Water and Wastewater facilities. The Section is also engaged in discussions with the consulting firm hired to perform vulnerability assessments and develop emergency response plans for the Public Utilities Department. This critical project will identify Water and Wastewater system vulnerabilities and provide a prioritized plan for security upgrades and/or redundancy to the system, modifications of operational procedures, and/or policy changes to mitigate identified risks to critical assets.

## Water Construction and Maintenance

The Water Construction and Maintenance Division continues to reduce the use of the Miramar Landfill through recycling and reusing material wherever possible in an effort to replicate the success of Fiscal Year 2010 when the Public Utilities Department was selected by the City of San Diego's Environmental Services Department as one of the recipients of Recycler of the Year for Waste Reduction and Recycling Awards Program. As of December 31<sup>st</sup>, 2013 the Division has recycled approximately 70,980 pounds of used water meters. The Capital Improvement Program Construction Section has completed nine water group jobs throughout the City. In addition, as the Department continues to move forward with the Automated Metering Infrastructure (AMI) program, the Meter Shop section has installed and retrofitted approximately 5,691 meters. The Division is also in the process of establishing a risk-based preventative maintenance program for valves and hydrants. Currently, preventative maintenance for all valves and hydrants are on a five-year rotational schedule. Implementing a risk-based maintenance program will give the Division the ability to perform preventative maintenance more often on older valves that are more susceptible to breaks without increasing labor costs. It will also allow the Division to perform preventative maintenance less frequently on newly installed valves and hydrants that are less likely to malfunction.

## Water System Operations

The Water System Operations Division continues to improve the water quality delivered to the Department's customers through both water treatment plant and potable water distribution system optimization and improvements. Throughout this past year, all three water treatment plants have delivered safe and reliable potable water.

The Division continues to actively participate with the American Water Works Association's (AWWA) Partnership for Safe Water Program (Partnership Program). The Partnership Program's mission is to improve the quality of drinking water delivered to customers of public water supplies by optimizing system operations. The City's Otay Water Treatment Plant (WTP) received the Director's Award of Recognition for the fifth consecutive year for Calendar Year 2012 from the Partnership Program. Otay WTP was one of only five water treatment plants to receive this "five consecutive years" national award. Also, the 2012 award was obtained while treating more challenging source water quality received from local reservoirs and recognizes outstanding performance by the Otay WTP staff team. The Otay WTP is currently preparing to submit their 2013 Performance Report to the Partnership Program. The City's Miramar WTP received the Director's Award of Recognition in 2012 and 2013 for its efforts related to the Partnership Program participation. It was one of only seven water treatment plants to be recognized with the Director's Award in 2013. In addition, the Miramar WTP applied for and received the Partnership Program's 2013 President's Award for outstanding performance, one of only five in the United States. The President's Award has



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more stringent performance requirements and recognizes treatment plants that achieve the Partnership Program's rigorous turbidity standards throughout the year and are working to full optimization. The City's Alvarado WTP began its first year of active Partnership Program participation in 2013 and has implemented several optimizing projects. A performance report for the Alvarado WTP will be submitted to the Partnership in 2014. The City's Potable Water Distribution System Section actively participates in the Partnership Program and continues working towards improving water quality through optimized and customized performance improvements.

The Water System Operations Division also continues to work closely with the San Diego County Water Authority (SDCWA) on a variety of projects, programs, and agreements involving and/or impacting City water supply operations and water storage facilities. For example, SDCWA's San Vicente Dam Raise Project, which will raise the City's existing dam by 117 feet and increase local water storage in San Vicente by over 150,000 acre feet, requires critical coordination and review to ensure that City water supply operations are not impacted during construction. The Division's operations and engineering staff will be challenged to continue this effort as construction ends this year and the new facilities become operational.

Overall, Water System Operations staff continues to optimize the water treatment plants and water distribution system while providing drinking water quality that surpasses the required federal and State standards and treatment techniques. This effort is an indicator of the Staff's commitment to excellence in treatment and distribution system process optimization. Furthermore, these efforts demonstrated the commitment to deliver an aesthetically pleasing and safe product to all customers.

## **Engineering and Program Management**

The Engineering and Program Management Division continued its support of the efforts of the Department to reduce sewer spills and water main breaks and meet the requirements of the Final Consent Decree with the Environmental Protection Agency for the sewer system and the Compliance Order with the State Department of Public Health for the water system.

**Sewer Modeling.** The Division assessed the capacity of 123 trunk sewers and completed hydraulic modeling of 362.5 miles of the small diameter mains. The Division also completed Closed Circuit Television inspection of 54.96 miles of sewer mains and 768 manholes, and completed condition assessment of 57.35 miles of sewer mains and 1,580 manholes to determine the upgrade and maintenance plans. In addition, the Division analyzed 157 flow meters to identify the potential sources of rainwater inflows and infiltrations to plan for effective sewer system operations.

**Water Modeling.** The Division completed the potable recycled water model 2013 update for new facilities and customer demand; completed over 75 group job pipe sizing assessment studies and water study reviews for the potable and recycled water system; continued working on implementation of water quality online modeling, surge analysis, and pump station energy optimization model; and provided modeling support for the leak detection pilot study by the Brady/IBM team.

**Program Management.** The Division worked with the Public Works-Engineering Department to oversee the completion of 7.55 miles of replacement/rehabilitation/repair of sewer mains and the replacement of 7.64 miles of water mains between July 1, 2013 and December 31, 2013. In addition, the Division oversaw the construction completion of the MBC Receiving Tank Cleaning contract; completed the plans and specifications for Point Loma Digesters 7, N1/N2, C1/C2 Roof Repairs and Replacement project; and prepared four pipeline rehabilitation packages: AA-1, AB-1, AC-1 and AD-1, with a total of 29.5 miles.

**Water Master Planning and 10% Design.** The Division has hired Arcadis to develop Phase II of the Asbestos Cement (AC) Water Main Replacement Program, which will assess 2,100 miles of AC pipeline. The Division has also hired Simon Wong Engineering to conduct condition assessment of 12 potable water storage facilities. The Division has updated the Water CIP Prioritization List to include all new projects. The Division also completed the Miramar North City and Scripps Ranch Focus Areas of the Master Plan and transferred several capital improvement projects to the Public Works Department for execution of the design and construction.

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***Wastewater Master Planning and Condition Assessment.*** The Division effectively procured and executed three consulting contracts, namely Three Water Transmission Pipelines, As-Needed Engineering Services for Wastewater Facilities, and Programmatic Wastewater Pipelines, with the intent to assess the condition of major water and wastewater facilities. Two additional consulting contracts were executed, specifically the As-Needed Engineering Consultant Services contract, which provides highly specialized technical services to assist the City in implementing multifaceted water/wastewater projects on an as-needed basis, and the Operation Optimization contract, which entails evaluating existing water and wastewater facilities and operations to determine where improvements in operational efficiencies and/or cost savings can be made. Lastly, the Division is in the process of addressing the rehabilitation of the Miramar Phase III and IV potable water transmission pipeline. Four pipe sections, identified through condition assessment process, will be replaced; the Condition Assessment Process will result in substantial savings to the City.

***Environmental and Canyon Access.*** The Division provides environmental, biological, and permitting support to the Division and to other Public Utilities Divisions. Environmental support includes providing direct support for Water and Wastewater emergency response programs, collection and maintenance of GIS datasets, monitoring of work in environmentally sensitive areas, and ensuring that all operations and maintenance activities of the Department comply with local, State, and federal environmental regulations. The Division continues to manage the habitat mitigation program in compliance with local, State, and federal environmental regulations, allowing the Department to use these sites to satisfy compensatory mitigation requirements for current and future water and sewer projects. The Division has initiated and completed various habitat re-vegetation projects associated with operations and maintenance of water and sewer pipelines and long-term access projects related to the Canyon Sewer and Long-Term Access Program. The Division continues to design, permit and construct new long-term access projects to meet operational demands.

***Energy Management.*** The Division successfully completed activities related to energy conservation and renewable energy. The Employee Development and Training Center will have its Energy and Climate Protection Audit completed by June 2014. The Department completed its 1.6 Megawatt(MW) landfill gas fuels renewable energy power plant at the North City Water Reclamation Plant in January 2014. The Division has completed the design of installation of eight emergency generators at major sewer pump stations and wastewater facilities, and construction has begun. A design-builder was selected for the installation of photovoltaic systems at the Metro Operation Center and at the Bayview Water Pump Station & Reservoir for a total installation of about 1MW. Additionally, a 1MW size system is being designed for the Miramar Water Treatment Plant's new clearwell roofs.

## ***Environmental Monitoring and Technical Services***

The Division successfully executed the National Pollutant Discharge Elimination System-mandated ocean-monitoring program for the Point Loma and South Bay ocean outfall regions, which encompasses an area of coastal waters greater than 340 square miles and includes the collection and analysis of thousands of samples of ocean water, sediments, and marine life, and required more than 200 days of boat operations. The Program also provides ocean-monitoring services to the International Boundary and Water Commission, which was responsible for recovering approximately \$1.0 million in Fiscal Year 2014.

The Division also completed the fourth year of a 4-year agreement with the Scripps Institute for Oceanography (SIO) to monitor the health of the San Diego region's kelp forest ecosystem, and approval to extend this agreement for another five years is currently underway. This long-term project is critical in order to achieve the City's enhanced ocean monitoring objectives to ensure the protection of San Diego's coastal marine environment. The Division also participated successfully in all phases of the summer 2013 kickoff of the Bight '13 Southern California Bight Regional Monitoring Program.

The State of California re-certified the Marine Microbiology Laboratory to perform microbiological analysis of drinking water. The Division now has two separate certified facilities, which allows the Department to be better prepared to handle public health or natural disaster emergencies impacting the drinking water system. The Division also maintained United States Environmental Protection Agency certification for Cryptosporidium Analysis (a microscopic parasite that causes the diarrheal disease cryptosporidiosis). The Laboratory and staff continue to be one of only several in Southern California and the only one in the San Diego area with this certification.

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The Division oversees storm water and air quality regulatory compliance for all water and wastewater operations, including the management of approximately 150 air quality permits for facilities and equipment, eight industrial storm water permits for wastewater sites, and the City's Jurisdictional Urban Runoff Management Plan that affects all facilities. This effort includes performing internal compliance audits to identify and correct deficiencies to help the Department comply with the complex regulations.

The Division successfully executed EPA and CDPH-required regulatory monitoring of San Diego's source waters, water filtration plants, and drinking water distribution system. Stage 2 Disinfection By-Product Monitoring continues at sixteen sites in the distribution system, and monitoring continues for the EPA Unregulated Contaminant Monitoring Rule. Enhanced monitoring of impound reservoirs in the distribution system was extended and expanded to support the Department's Nitrification Action Plan. The Division works with the Long-Range Planning and Water Resources Division to investigate customer and departmental concerns regarding potential water leaks and provides monitoring in an effort to identify future water sources. EMTS and LRP also collaborated to execute the winter portion of the Lower Otay Tracer Study in support of potential Indirect Potable Reuse initiatives.

The Division maintains an active in-house monitoring program of its nine drinking source water reservoirs for the *Quagga mussel*, an invasive species first seen in California in 2007. Proactive monitoring assists the Department with optimizing maintenance and control efforts designed to minimize the impact to the raw water delivery and treatment infrastructure, as well as the reservoir recreation facilities.

The Division regulates and bills for sewer discharges not originating from metered potable water connections known as "imported" flows. Cost of conveyance and treatment of these flows, such as seawater and extracted groundwater from remediation and construction projects, would otherwise be borne by sewer ratepayers. The Division recovered approximately \$1.9 million in Fiscal Year 2014 for the conveyance and treatment of these flows. Additionally, the Division recovered approximately \$2.0 million in Fiscal Year 2014 from the continued operation of the dump site for hauled liquid waste from septic systems and specifically permitted industrial liquid wastes, and the conveyance and treatment of these flows. This highly valued service provided to the San Diego area is the only industrial liquid waste dump station in San Diego County.

## Wastewater Collection

The Division continued its success as the leader among large cities in the nation in reducing the number of sanitary sewer overflows (SSOs). There were 42 SSOs in Fiscal Year 2013. While slightly higher than the 36 SSOs in Fiscal Year 2012, this statistic remains indicative of aggressive and successful overflow prevention and a 10 percent reduction program, and represents an 87 percent reduction from the level experienced in Fiscal Year 2001. It also represents a ratio of 1.39 SSOs per 100 miles of sewer main, well below the industry standard of 2.0 SSOs per 100 miles of main.

The Division is projecting 42 SSOs in Fiscal Year 2014 based on mid-year statistics. Continued reduction in SSOs is a daunting objective when current SSO levels are at less than 70 percent of the industry standard, but the Division is determined that there are still efficiencies to be gained, both in cleaning techniques and proactive attention to infrastructure defects that can help achieve this goal. The Division will redouble its efforts to maintain or improve upon this achievement in SSO prevention and reduction.

The Food Establishment Wastewater Discharge (FEWD) Permit Program has continued to be the model Fats, Oils and Greases (FOG) Program for other jurisdictions to follow. FEWD has shared its inspection techniques and successes with other jurisdictions and continues to find ways to improve. In Fiscal Year 2013, FEWD had 5,312 active Food Service Establishments (FSE). Of these, FEWD performed 7,506 site inspections at 2,120 unique FSEs. FEWD issued 1,970 FEWD permits (a 3-year permit) and 75 Notice of Violations and performed a record 913 plan checks. FEWD also assists the Public Information Office in the Residential FOG Outreach and staffs a booth at the San Diego County Apartment Association Convention and at the 2013 Earth Fair. The hallmark of a successful FOG program is the reduction of FOG-caused SSOs. In Fiscal Year 2013, there were five SSOs primarily caused by FOG; of these, two were attributed to a mixture of commercial FSEs and residential areas, two were attributed to residential only areas, and one SSO was unknown with no FSEs or residents in the area. There were no primarily FOG-caused

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SSOs by only commercial FSEs. Having ingrained the FOG best management practices at commercial FSEs, FEWD is looking into ways to expand the residential outreach program to have the same kind of impact in reducing residential FOG SSOs.

The Division's Construction Section has expanded its scope of services during the past year to include execution of smaller (manhole-to-manhole) capital improvement projects (CIPs) in cases where critical defects are identified. This effort has proven effective in reducing CIP backlogs, as these projects do not have to compete with other, larger projects for prioritization, and has also enabled the division to "fast-track" these repairs, thus eliminating the potential for a spill hazard by removing the defects.

For Fiscal Year 2013, the Main Cleaning Section cleaned a total of 2,340 miles of sewer main, compared to 2,062 miles of sewer main cleaned in Fiscal Year 2012, which represents nearly a 14 percent increase in productivity with the same staffing levels as in Fiscal Year 2012. Mileage statistics at mid-year suggest the Division will clean more than 2,100 miles of sewer main in Fiscal Year 2014.

The Division also successfully completed International Standardization Organization (ISO) audits with no major non-conformities, thus retaining its ISO 14001 certification.

A notable accomplishment during 2013 was the Division's recognition as the regional Large Collection System of the Year for the second consecutive year by the California Water Environment Association. Additionally, the Division was recognized as having the best large collection system in the entire State of California. These awards exemplify the Division's status as a statewide and national leader in the wastewater collection industry.

## Wastewater Treatment and Disposal

As 2013 was the 50th Anniversary of the San Diego Metropolitan Wastewater System, the Division reflected back on all the improvements made over the past 50 years and focused in on completing significant maintenance activities at these vital facilities and providing vigilant wastewater treatment service. The Division was recognized by the Industrial Environmental Association and received the 2013 Environmental Excellence Award for Sustainable Programs.

Software upgrades were made at water reclamation plants and major pump stations. The upgrades for the North City Water Reclamation Plant (NCWRP), Penasquitos Pump Station, Pump Station 1, and Pump Station 2 were initiated to enhance the reliability of the treatment system. Benefits of the completed upgrades at the Point Loma Wastewater Treatment Plant (PLWTP) and Metropolitan Biosolids Center (MBC) are being maximized and increased reliability and effectiveness of the treatment system is being experienced.

With the interim installation complete, six 2,000 kW emergency generators are now available if a regional outage occurs that affects Pump Station 1, Pump Station 64, Pump Station 65, and the Penasquitos Pump Station. The installation of an emergency generator at NCWRP is in progress. These emergency generators can be activated by staff during an outage. The Division's electrical staff is working diligently with necessary personnel in the City, as well as outside agencies, such as San Diego Gas & Electric and the Air Pollution Control District, to develop a plan for the implementation of permanent installation of these generators while adhering to the National Electric Code. The permanent installation will provide a seamless initiation of the generators when a power outage occurs.

The Department's renewable energy portfolio continued to generate revenue and save the Department approximately \$5.0 million in operating costs. Further energy savings will be realized from the new power plant unit installed and now operational at NCWRP, which will operate on additional available landfill gas. This new power plant joins the three existing co-generation facilities, which generate electric energy fueled by digester gas and/or landfill gas.

Staff has also completed many significant maintenance activities including:

- PLWTP: Cleaned three 3.6 million-gallon wastewater digesters, which treat the solids generated in the process;

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- Rehabilitated two of the three gas burners which addresses any excess methane that is unable to be used for energy production;
- Replaced the very large water softener system which is a key component for the odor control equipment;
- Cleaned all the power centers which will ensure reliable plant operation;
- MBC: Cleaned one 550,000 gallon raw solids receiving tank and replaced all valves on one of the three digesters;
- SBWRP: Installed a new 250hp jockey pump to save energy and better meet the varying demands for recycled water;
- NCWRP: Installed new major electrical transformer to ensure reliable power transmission;
- Pump Station 2: Rehabilitated the 36-inch cone valve which keeps the wastewater from flowing back into the station as it is pumped to PLWTP.



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## Department Summary

	FY2013 Actual	FY2014 Budget	FY2015 Proposed	FY2014–2015 Change
FTE Positions (Budgeted)	1,574.52	1,563.59	1,596.45	32.86
Personnel Expenditures	\$ 138,973,457	\$ 154,689,455	\$ 155,280,947	\$ 591,492
Non-Personnel Expenditures	586,120,985	625,940,031	655,876,019	29,935,988
<b>Total Department Expenditures</b>	<b>\$ 725,094,442</b>	<b>\$ 780,629,486</b>	<b>\$ 811,156,966</b>	<b>\$ 30,527,480</b>
<b>Total Department Revenue</b>	<b>\$ 855,775,034</b>	<b>\$ 837,703,113</b>	<b>\$ 886,201,900</b>	<b>\$ 48,498,787</b>

## General Fund

## Department Expenditures

	FY2013 Actual	FY2014 Budget	FY2015 Proposed	FY2014–2015 Change
Water	\$ 1,957,301	\$ 1,969,446	\$ 1,751,100	\$ (218,346)
<b>Total</b>	<b>\$ 1,957,301</b>	<b>\$ 1,969,446</b>	<b>\$ 1,751,100</b>	<b>\$ (218,346)</b>

## Significant Budget Adjustments

	FTE	Expenditures	Revenue
<b>Non-Discretionary Adjustment</b>	0.00	\$ 35,754	\$ -
Adjustment to expenditure allocations that are determined outside of the department's direct control. These allocations are generally based on prior year expenditure trends and examples of these include utilities, insurance, and rent.			
<b>San Dieguito River Park JPA</b>	0.00	(254,100)	-
Adjustment to reflect the reduction of funding for the San Dieguito River Park Joint Powers Authority (JPA).			
<b>Total</b>	<b>0.00</b>	<b>\$ (218,346)</b>	<b>\$ -</b>

## Expenditures by Category

	FY2013 Actual	FY2014 Budget	FY2015 Proposed	FY2014–2015 Change
<b>NON-PERSONNEL</b>				
Supplies	\$ 80,758	\$ 37,300	\$ 61,800	\$ 24,500
Contracts	1,534,301	1,927,146	1,648,396	(278,750)
Energy and Utilities	337,729	5,000	39,889	34,889
Other	1,672	-	-	-
Transfers Out	-	-	1,015	1,015
Capital Expenditures	2,842	-	-	-
<b>NON-PERSONNEL SUBTOTAL</b>	<b>1,957,301</b>	<b>1,969,446</b>	<b>1,751,100</b>	<b>(218,346)</b>
<b>Total</b>	<b>\$ 1,957,301</b>	<b>\$ 1,969,446</b>	<b>\$ 1,751,100</b>	<b>\$ (218,346)</b>

## Revenues by Category

	FY2013 Actual	FY2014 Budget	FY2015 Proposed	FY2014–2015 Change
Charges for Services	\$ 989,809	\$ 940,000	\$ 940,000	\$ -
Other Revenue	8,647	-	-	-
<b>Total</b>	<b>\$ 998,456</b>	<b>\$ 940,000</b>	<b>\$ 940,000</b>	<b>\$ -</b>

# Public Utilities

## Metropolitan Sewer Utility Fund

### Department Expenditures

	FY2013 Actual	FY2014 Budget	FY2015 Proposed	FY2014–2015 Change
Metropolitan Wastewater - Metro	\$ 93,936,352	\$ 87,852,743	\$ <b>88,512,101</b>	\$ 659,358
Public Utilities	102,003,410	119,231,152	<b>124,073,922</b>	4,842,770
<b>Total</b>	<b>\$ 195,939,762</b>	<b>\$ 207,083,895</b>	<b>\$ 212,586,023</b>	<b>\$ 5,502,128</b>

### Department Personnel

	FY2013 Budget	FY2014 Budget	FY2015 Proposed	FY2014–2015 Change
Metropolitan Wastewater - Metro	356.84	255.90	<b>269.40</b>	13.50
Public Utilities	94.05	191.45	<b>196.10</b>	4.64
<b>Total</b>	<b>450.89</b>	<b>447.35</b>	<b>465.50</b>	<b>18.14</b>

### Significant Budget Adjustments

	FTE	Expenditures	Revenue
<b>Repair and Maintenance Expenditures</b>	0.00	\$ 7,180,000	\$ -
Adjustment to reflect the addition of funding for repair and maintenance expenditures at various wastewater facilities.			
<b>Support for Portable Reuse Program</b>	4.16	2,608,572	-
Adjustment to reflect the addition of staffing and support for the Potable Reuse Program.			
<b>Facility/Infrastructure Condition Assessments</b>	0.00	2,379,231	-
Adjustment to reflect the addition of funding for facility and infrastructure condition assessment projects.			
<b>State Revolving Fund (SRF) Adjustment</b>	0.00	2,078,842	-
Adjustment to reflect the addition of funding for SRF loan repayments.			
<b>Non-Discretionary Adjustment</b>	0.00	973,726	-
Adjustment to expenditure allocations that are determined outside of the department's direct control. These allocations are generally based on prior year expenditure trends and examples of these include utilities, insurance, and rent.			
<b>Scientific and Planning Studies</b>	0.00	660,000	-
Adjustment to reflect the addition of funding for various scientific and planning studies.			
<b>Point Loma Water Treatment Plant Waiver Application</b>	0.00	650,000	-
Adjustment to reflect the addition of funding to support the Point Loma Wastewater Treatment Plant permit application.			
<b>Public Utilities Restructure</b>	9.20	631,149	-
Reallocation among funds to more accurately reflect operational expenditures as well as an adjustment due to efficiencies realized.			
<b>Laboratory Supplies and Equipment</b>	0.00	610,000	-
Adjustment to reflect the addition of funding for laboratory supplies, equipment and facility improvements.			
<b>Enterprise Asset Management and GIS Support</b>	0.33	343,141	-
Adjustment to reflect the addition of funding and staff support for the Enterprise Asset Management (EAM) and Geographic Information Systems (GIS) projects.			

# Public Utilities

## Significant Budget Adjustments (Cont'd)

	FTE	Expenditures	Revenue
<b>Continuation of Core Operations</b> Adjustment to reflect the addition of staffing for the continuation of core operations.	3.00	293,346	-
<b>Conservation Programs</b> Adjustment to reflect the addition of staffing and support for conservation outreach and rebate programs.	0.00	210,000	-
<b>Quality Assurance Workplan</b> Adjustment to reflect the addition of funding to support the Quality Assurance workplan and other employee services.	1.15	191,723	-
<b>Security Enhancements</b> Adjustment to reflect the addition of funding for security enhancements at water and wastewater facilities.	0.00	190,276	-
<b>Program Manager</b> Addition of 1.00 Program Manager to coordinate and manage the Wastewater and Water Construction & Maintenance branch.	0.33	61,450	-
<b>Non-Standard Hour Personnel Funding</b> Adjustment to expenditures according to a zero-based annual review of non-standard hour personnel funding requirements.	0.78	35,776	-
<b>Graphic Designer</b> Addition of 1.00 Graphic Designer for the Public Utilities Department.	0.33	26,686	-
<b>Supplemental Cost of Living Adjustment (COLA)</b> Adjustment to reflect the allocation of the pay-go costs for the continued funding of the Supplemental COLA Benefit.	0.00	9,433	-
<b>Reclassification of IT Expenditures</b> Adjustment reflects the reclassification of information technology expenditures.	0.00	8,250	-
<b>Equipment/Support for Information Technology</b> Adjustment to expenditure allocations according to a zero-based annual review of information technology funding requirements and priority analyses.	0.00	(229,855)	-
<b>Refunds to Participating Agencies</b> Adjustment to reflect refunds to Participating Agencies that were overbilled.	0.00	(656,960)	-
<b>Salary and Benefit Adjustments</b> Adjustments to reflect the annualization of the Fiscal Year 2014 negotiated salary compensation schedule, changes to savings resulting from positions to be vacant for any period of the fiscal year, retirement contributions, retiree health contributions, and labor negotiation adjustments.	(1.14)	(679,861)	-
<b>Support for COMNET</b> Adjustment to reflect the reduction in contractual support for the Computerized Neighborhood Environment Tracking (COMNET) System.	0.00	(950,000)	-
<b>One-Time Reductions and Annualizations</b> Adjustment to reflect the removal of one-time revenues and expenditures, and the annualization of revenues and expenditures, implemented in Fiscal Year 2014.	0.00	(11,122,797)	(18,844)

# Public Utilities

## Significant Budget Adjustments (Cont'd)

	FTE	Expenditures	Revenue
<b>Revised Revenue</b>	0.00	-	10,678,900
Adjustment to reflect Fiscal Year 2015 revenue projections.			
<b>Total</b>	<b>18.14</b>	<b>\$ 5,502,128</b>	<b>\$ 10,660,056</b>

## Expenditures by Category

	FY2013 Actual	FY2014 Budget	FY2015 Proposed	FY2014-2015 Change
<b>PERSONNEL</b>				
Personnel Cost	\$ 26,942,123	\$ 27,794,779	\$ 28,751,544	\$ 956,765
Fringe Benefits	16,862,012	19,116,285	19,373,560	257,275
<b>PERSONNEL SUBTOTAL</b>	<b>43,804,135</b>	<b>46,911,064</b>	<b>48,125,104</b>	<b>1,214,040</b>
<b>NON-PERSONNEL</b>				
Supplies	\$ 36,411,853	\$ 20,390,282	\$ 20,010,424	\$ (379,858)
Contracts	28,531,186	51,573,204	54,797,792	3,224,588
Information Technology	3,987,858	5,302,312	5,026,153	(276,159)
Energy and Utilities	12,810,891	13,702,892	14,924,881	1,221,989
Other	126,157	106,040	106,040	-
Appropriated Reserve	-	3,500,000	3,500,000	-
Transfers Out	63,066,233	64,335,869	64,288,546	(47,323)
Capital Expenditures	804,627	1,246,977	1,791,828	544,851
Debt	6,396,821	15,255	15,255	-
<b>NON-PERSONNEL SUBTOTAL</b>	<b>152,135,627</b>	<b>160,172,831</b>	<b>164,460,919</b>	<b>4,288,088</b>
<b>Total</b>	<b>\$ 195,939,762</b>	<b>\$ 207,083,895</b>	<b>\$ 212,586,023</b>	<b>\$ 5,502,128</b>

## Revenues by Category

	FY2013 Actual	FY2014 Budget	FY2015 Proposed	FY2014-2015 Change
Charges for Services	\$ 71,735,690	\$ 69,234,844	\$ 69,139,000	\$ (95,844)
Fines Forfeitures and Penalties	333,992	-	-	-
Other Revenue	225,188	-	100,000	100,000
Rev from Money and Prop	578,839	-	-	-
Rev from Other Agencies	-	22,947,000	33,602,900	10,655,900
Transfers In	3,404,022	-	-	-
<b>Total</b>	<b>\$ 76,277,731</b>	<b>\$ 92,181,844</b>	<b>\$ 102,841,900</b>	<b>\$ 10,660,056</b>

## Personnel Expenditures

Job Number	Job Title / Wages	FY2013 Budget	FY2014 Budget	FY2015 Proposed	Salary Range	Total
<b>FTE, Salaries, and Wages</b>						
20000011	Account Clerk	4.51	4.51	4.51	\$31,491 - \$37,918	\$ 167,576
20000007	Accountant 3	0.57	0.57	0.33	59,363 - 71,760	23,676
20000102	Accountant 4	0.38	0.38	0.33	66,768 - 88,982	29,365
20000012	Administrative Aide 1	0.38	0.38	1.26	36,962 - 44,533	52,383
20000024	Administrative Aide 2	6.28	5.96	6.28	42,578 - 51,334	311,776
20000057	Assistant Chemist	27.00	26.00	26.00	53,789 - 65,333	1,538,226
90000057	Assistant Chemist - Hourly	0.00	0.35	0.00	53,789 - 65,333	-
20001140	Assistant Department Director	0.33	0.33	0.66	31,741 - 173,971	92,397
20000070	Assistant Engineer-Civil	9.68	8.61	8.22	57,866 - 69,722	524,127

# Public Utilities

## Personnel Expenditures (Cont'd)

Job Number	Job Title / Wages	FY2013 Budget	FY2014 Budget	FY2015 Proposed	Salary Range	Total
20000087	Assistant Engineer-Mechanical	0.33	0.61	<b>0.61</b>	57,866 - 69,722	42,529
20000080	Assistant Laboratory Technician	1.00	1.00	<b>1.00</b>	33,696 - 40,602	40,602
20000041	Assistant Management Analyst	0.33	0.33	<b>0.33</b>	44,470 - 54,059	17,843
20001228	Assistant Metropolitan Wastewater Director	0.33	0.33	<b>0.33</b>	31,741 - 173,971	46,199
20000140	Associate Chemist	8.00	7.25	<b>7.25</b>	62,005 - 75,067	527,714
90000140	Associate Chemist - Hourly	1.05	0.00	<b>0.00</b>	62,005 - 75,067	-
20000311	Associate Department Human Resources Analyst	1.65	1.65	<b>1.65</b>	54,059 - 65,333	100,381
20000143	Associate Engineer-Civil	10.21	9.44	<b>10.00</b>	66,622 - 80,454	707,752
20000145	Associate Engineer-Civil	1.09	0.90	<b>0.50</b>	66,622 - 80,454	39,839
90000143	Associate Engineer-Civil - Hourly	0.50	0.35	<b>0.35</b>	66,622 - 80,454	23,318
20000150	Associate Engineer-Electrical	2.33	2.61	<b>2.61</b>	66,622 - 80,454	208,375
20000154	Associate Engineer-Mechanical	0.45	0.61	<b>0.61</b>	66,622 - 80,454	40,642
20000119	Associate Management Analyst	11.68	11.76	<b>11.94</b>	54,059 - 65,333	733,321
20000132	Associate Management Analyst	0.00	0.25	<b>0.25</b>	54,059 - 65,333	13,512
20000137	Associate Management Analyst	1.98	0.00	<b>0.00</b>	54,059 - 65,333	-
20000134	Associate Management Analyst	0.38	0.38	<b>0.33</b>	54,059 - 65,333	21,456
20000162	Associate Planner	0.32	0.66	<b>0.66</b>	56,722 - 68,536	43,441
20000655	Biologist 2	6.00	6.00	<b>6.00</b>	53,726 - 65,333	311,505
20000649	Biologist 3	0.00	0.24	<b>0.24</b>	62,005 - 75,067	7,332
20000648	Biologist 3	1.00	1.00	<b>1.00</b>	62,005 - 75,067	75,067
20000195	Boat Operator	1.00	1.00	<b>1.00</b>	43,493 - 51,896	51,118
20000205	Building Service Supervisor	2.00	1.34	<b>1.34</b>	45,718 - 55,286	67,288
20000224	Building Service Technician	2.00	2.34	<b>2.34</b>	33,322 - 39,666	90,064
20000539	Clerical Assistant 2	9.46	8.85	<b>8.70</b>	29,931 - 36,067	305,388
20001168	Deputy Director	3.14	2.60	<b>2.60</b>	46,966 - 172,744	308,553
90001168	Deputy Director - Hourly	0.46	0.35	<b>0.35</b>	46,966 - 172,744	38,449
20000924	Executive Secretary	0.33	0.33	<b>0.33</b>	43,555 - 52,666	17,113
90000924	Executive Secretary - Hourly	0.00	0.00	<b>0.12</b>	43,555 - 52,666	5,227
20000461	Field Representative	0.48	0.81	<b>0.81</b>	32,323 - 38,917	31,381
20000184	Fleet Parts Buyer	1.00	1.00	<b>1.00</b>	44,637 - 54,059	53,248
90000819	Golf Course Manager - Hourly	0.06	0.09	<b>0.10</b>	59,488 - 71,760	7,176
20000487	Graphic Designer	0.00	0.00	<b>0.33</b>	43,264 - 51,979	14,277
20000501	Heavy Truck Driver 2	3.00	3.00	<b>3.00</b>	37,565 - 45,302	135,906
20000178	Information Systems Administrator	0.34	0.34	<b>0.34</b>	73,466 - 88,982	30,253
20000290	Information Systems Analyst 2	3.40	3.06	<b>3.06</b>	54,059 - 65,333	196,095
20000293	Information Systems Analyst 3	2.38	2.38	<b>2.38</b>	59,363 - 71,760	137,911
20000998	Information Systems Analyst 4	1.70	1.36	<b>1.36</b>	66,768 - 80,891	110,016
20000999	Information Systems Analyst 4	1.00	1.00	<b>1.00</b>	66,768 - 80,891	80,891
20000514	Instrumentation and Control Supervisor	1.00	1.00	<b>1.00</b>	56,410 - 68,224	67,484

# Public Utilities

## Personnel Expenditures (Cont'd)

Job Number	Job Title / Wages	FY2013 Budget	FY2014 Budget	FY2015 Proposed	Salary Range	Total
20000515	Instrumentation and Control Technician	6.00	6.00	<b>8.00</b>	51,896 - 62,296	372,842
20000497	Irrigation Specialist	0.48	0.81	<b>0.81</b>	37,814 - 45,261	36,164
20000590	Laboratory Technician	17.00	17.00	<b>17.00</b>	40,622 - 49,067	620,140
20000618	Machinist	5.00	4.00	<b>4.00</b>	46,134 - 55,266	220,235
20001073	Management Intern	0.00	0.48	<b>0.00</b>	24,274 - 29,203	-
90001073	Management Intern - Hourly	3.17	3.37	<b>2.94</b>	24,274 - 29,203	71,369
20000625	Marine Biologist 2	0.00	1.00	<b>1.00</b>	53,726 - 65,333	53,726
20000624	Marine Biologist 2	18.00	17.00	<b>17.00</b>	53,726 - 65,333	1,091,205
20000626	Marine Biologist 3	5.00	5.00	<b>5.00</b>	62,005 - 75,067	375,335
20000165	Multimedia Production Specialist	0.16	0.27	<b>0.27</b>	43,264 - 51,979	14,038
20000634	Organization Effectiveness Specialist 2	1.04	0.99	<b>0.99</b>	54,059 - 65,333	64,482
20000627	Organization Effectiveness Specialist 3	0.33	0.33	<b>0.58</b>	59,363 - 71,760	38,519
20000639	Organization Effectiveness Supervisor	0.33	0.33	<b>0.33</b>	66,768 - 80,891	26,699
20000667	Painter	3.00	3.00	<b>3.00</b>	41,600 - 49,962	145,497
20000680	Payroll Specialist 2	3.30	3.30	<b>3.30</b>	34,611 - 41,787	137,480
20000173	Payroll Supervisor	0.66	0.66	<b>0.66</b>	39,686 - 48,069	31,486
20000701	Plant Process Control Electrician	17.16	17.00	<b>19.00</b>	51,896 - 62,296	1,149,180
20000705	Plant Process Control Supervisor	7.66	7.33	<b>6.33</b>	56,410 - 68,224	418,025
20000703	Plant Process Control Supervisor	3.00	3.00	<b>3.00</b>	56,410 - 68,224	204,672
20000687	Plant Technician 1	20.00	20.00	<b>22.00</b>	37,814 - 45,261	779,177
90000687	Plant Technician 1 - Hourly	0.00	0.00	<b>1.00</b>	37,814 - 45,261	37,814
20000688	Plant Technician 2	24.00	24.00	<b>25.00</b>	41,454 - 49,504	1,138,088
20000689	Plant Technician 3	12.00	13.00	<b>14.00</b>	45,490 - 54,434	751,875
20000706	Plant Technician Supervisor	7.00	7.00	<b>9.00</b>	52,666 - 62,837	307,979
20000732	Power Plant Operator	2.00	4.00	<b>4.00</b>	49,712 - 59,342	214,722
20000733	Power Plant Supervisor	3.00	2.00	<b>2.00</b>	55,141 - 66,581	133,162
90000733	Power Plant Supervisor - Hourly	0.11	0.35	<b>0.35</b>	55,141 - 66,581	19,299
21000184	Prin Backflow & Cross Connection Specialist	0.00	0.27	<b>0.27</b>	50,003 - 60,549	16,094
20000740	Principal Drafting Aide	1.32	0.99	<b>0.99</b>	50,003 - 60,549	58,401
21000100	Principal Engineering Aide	0.16	0.00	<b>0.00</b>	50,003 - 60,549	-
20000743	Principal Engineering Aide	2.40	1.99	<b>1.94</b>	50,003 - 60,549	117,227
20000707	Principal Plant Technician Supervisor	2.00	2.00	<b>2.00</b>	63,024 - 76,045	152,090
20001222	Program Manager	2.02	3.14	<b>4.63</b>	46,966 - 172,744	481,080
20000760	Project Assistant	0.00	0.12	<b>0.12</b>	57,866 - 69,722	8,364
20000761	Project Officer 1	0.00	0.24	<b>0.24</b>	66,622 - 80,454	19,030
90000761	Project Officer 1 - Hourly	0.06	0.09	<b>0.10</b>	66,622 - 80,454	8,045
20000763	Project Officer 2	0.33	0.73	<b>0.73</b>	76,794 - 92,851	66,932
20000766	Project Officer 2	0.32	0.54	<b>0.54</b>	76,794 - 92,851	50,134



# Public Utilities

## Personnel Expenditures (Cont'd)

Job Number	Job Title / Wages	FY2013 Budget	FY2014 Budget	FY2015 Proposed	Salary Range	Total
20000783	Public Information Clerk	1.14	1.03	<b>0.93</b>	31,491 - 37,918	35,244
20000784	Public Information Officer	0.00	0.00	<b>0.50</b>	43,514 - 52,707	21,757
20001150	Public Utilities Director	0.33	0.33	<b>0.33</b>	59,155 - 224,099	62,039
20000319	Pump Station Operator	10.00	10.00	<b>10.00</b>	43,493 - 51,917	467,227
20000320	Pump Station Operator Supervisor	1.00	1.00	<b>1.00</b>	47,674 - 56,888	56,888
20000559	Recycling Program Manager	0.16	0.27	<b>0.27</b>	76,731 - 92,893	25,080
20000560	Recycling Program Manager	0.33	0.33	<b>0.33</b>	76,731 - 92,893	-
20000847	Safety Officer	0.66	0.66	<b>0.66</b>	57,907 - 69,930	45,690
20000854	Safety Representative 2	3.97	3.31	<b>3.31</b>	50,461 - 61,027	197,280
20001042	Safety and Training Manager	0.99	0.99	<b>0.99</b>	66,768 - 80,891	26,699
20000869	Senior Account Clerk	0.76	0.76	<b>0.76</b>	36,067 - 43,514	32,741
21000183	Senior Backflow & Cross Connection Specialist	0.00	1.62	<b>2.62</b>	44,429 - 53,706	130,538
20000828	Senior Biologist	1.16	0.77	<b>0.77</b>	71,760 - 86,466	66,575
20000196	Senior Boat Operator	1.00	1.00	<b>1.00</b>	47,840 - 57,117	57,117
90000222	Senior Building Maintenance Supervisor - Hourly	0.25	0.00	<b>0.00</b>	76,918 - 93,018	-
20000883	Senior Chemist	2.00	1.45	<b>1.45</b>	71,739 - 86,466	124,593
20000885	Senior Civil Engineer	2.98	3.35	<b>3.85</b>	76,794 - 92,851	349,434
20000890	Senior Civil Engineer	0.00	0.00	<b>0.33</b>	76,794 - 92,851	25,346
90000885	Senior Civil Engineer - Hourly	0.41	0.35	<b>0.35</b>	76,794 - 92,851	26,878
20000927	Senior Clerk/Typist	1.33	1.33	<b>1.00</b>	36,067 - 43,514	42,644
20000312	Senior Department Human Resources Analyst	0.33	0.33	<b>0.33</b>	59,363 - 71,760	23,679
20000400	Senior Drafting Aide	3.69	3.69	<b>3.64</b>	44,429 - 53,706	185,082
20000905	Senior Electrical Engineer	1.00	1.00	<b>1.00</b>	76,794 - 92,851	76,794
20000902	Senior Engineering Aide	0.80	0.00	<b>0.00</b>	44,429 - 53,706	-
20000015	Senior Management Analyst	5.23	4.92	<b>4.61</b>	59,363 - 71,760	297,674
90000015	Senior Management Analyst - Hourly	0.11	0.00	<b>0.00</b>	59,363 - 71,760	-
20000880	Senior Marine Biologist	1.00	1.00	<b>1.00</b>	71,760 - 86,466	86,466
20000918	Senior Planner	0.16	0.39	<b>0.39</b>	65,354 - 79,019	29,486
20000920	Senior Planner	0.48	0.81	<b>0.81</b>	65,354 - 79,019	62,245
20000708	Senior Plant Technician Supervisor	8.66	7.33	<b>7.33</b>	60,070 - 72,467	529,378
20000968	Senior Power Plant Supervisor	1.00	0.00	<b>1.00</b>	63,357 - 76,440	-
90000968	Senior Power Plant Supervisor - Hourly	0.00	0.35	<b>0.35</b>	63,357 - 76,440	22,175
20000916	Senior Public Information Officer	0.82	0.93	<b>0.60</b>	54,059 - 65,333	38,376
20000938	Senior Wastewater Operations Supervisor	6.00	6.00	<b>6.00</b>	70,699 - 85,530	513,180
20000055	Senior Wastewater Plant Operator	1.00	1.00	<b>1.00</b>	56,534 - 67,621	67,621
20000950	Stock Clerk	6.00	5.34	<b>5.34</b>	30,056 - 36,275	193,710

# Public Utilities

## Personnel Expenditures (Cont'd)

Job Number	Job Title / Wages	FY2013 Budget	FY2014 Budget	FY2015 Proposed	Salary Range	Total
20000955	Storekeeper 1	6.00	3.34	<b>3.34</b>	34,611 - 41,517	138,662
20000956	Storekeeper 2	0.00	2.00	<b>2.00</b>	37,835 - 45,718	83,553
20000954	Storekeeper 3	1.00	1.00	<b>1.00</b>	39,811 - 47,882	47,882
90000964	Student Engineer - Hourly	0.32	0.00	<b>0.68</b>	26,707 - 32,011	18,161
90001146	Student Intern - Hourly	0.00	0.26	<b>0.00</b>	18,616 - 22,318	-
20000313	Supervising Department Human Resources Analyst	0.33	0.33	<b>0.33</b>	66,768 - 80,891	26,699
20000995	Supervising Economist	0.41	0.41	<b>0.41</b>	66,768 - 80,891	33,167
20000990	Supervising Field Representative	0.16	0.27	<b>0.27</b>	35,651 - 42,890	11,581
20000970	Supervising Management Analyst	3.33	3.69	<b>3.98</b>	66,768 - 80,891	321,859
20000985	Supervising Management Analyst	0.16	0.27	<b>0.27</b>	66,768 - 80,891	21,840
20001021	Supervising Public Information Officer	0.16	0.99	<b>0.99</b>	59,363 - 71,760	71,028
21000177	Trainer	0.00	1.98	<b>1.32</b>	54,059 - 65,333	81,783
20001041	Training Supervisor	0.33	0.33	<b>0.25</b>	59,363 - 71,760	17,940
20000937	Wastewater Operations Supervisor	24.00	24.00	<b>25.00</b>	64,667 - 77,293	1,901,620
20000941	Wastewater Plant Operator	40.00	40.00	<b>43.00</b>	53,830 - 64,397	2,557,122
20000931	Wastewater Treatment Superintendent	4.00	4.00	<b>4.00</b>	81,578 - 98,675	393,220
20001058	Welder	2.00	2.00	<b>2.00</b>	44,366 - 53,206	105,614
20000756	Word Processing Operator	5.42	6.21	<b>6.28</b>	31,491 - 37,918	224,687
	Bilingual - Regular					3,838
	Class B					1,040
	Confined Space Pay					3,411
	Exceptional Performance Pay-Classified					927
	Exceptional Performance Pay-Unclassified					1,045
	Geographic Info Cert Pay					1,996
	Night Shift Pay					73,922
	Overtime Budgeted					1,383,667
	Plant/Tank Vol Cert Pay					103,160
	Reg Pay For Engineers					172,063
	Split Shift Pay					25,902
	Termination Pay Annual Leave					82,080
	Welding Certification					3,640
<b>FTE, Salaries, and Wages Subtotal</b>		<b>450.89</b>	<b>447.35</b>	<b>465.50</b>		<b>\$ 28,751,544</b>

	FY2013 Actual	FY2014 Budget	FY2015 Proposed	FY2014-2015 Change
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### Fringe Benefits

Employee Offset Savings	\$ 166,950	\$ 224,271	\$ 179,280	\$ (44,991)
Flexible Benefits	2,374,250	2,833,134	3,255,729	422,595
Long-Term Disability	144,503	139,837	93,094	(46,743)
Medicare	415,640	342,998	362,502	19,504
Other Post-Employment Benefits	2,637,197	2,622,431	2,702,088	79,657
Retiree Medical Trust	4,098	3,836	5,200	1,364

## Public Utilities

	FY2013 Actual	FY2014 Budget	FY2015 Proposed	FY2014–2015 Change
Retirement 401 Plan	14,870	15,277	15,688	411
Retirement ADC	8,233,160	10,015,416	10,002,751	(12,665)
Retirement DROP	122,105	118,523	117,613	(910)
Retirement Offset Contribution	48,114	-	-	-
Risk Management Administration	422,918	398,507	456,283	57,776
Supplemental Pension Savings Plan	1,498,838	1,428,565	1,491,452	62,887
Unemployment Insurance	73,654	74,458	53,452	(21,006)
Workers' Compensation	705,714	899,032	638,428	(260,604)
<b>Fringe Benefits Subtotal</b>	<b>\$ 16,862,012</b>	<b>\$ 19,116,285</b>	<b>\$ 19,373,560</b>	<b>\$ 257,275</b>
<b>Total Personnel Expenditures</b>			<b>\$ 48,125,104</b>	

## Municipal Sewer Revenue Fund

### Department Expenditures

	FY2013 Actual	FY2014 Budget	FY2015 Proposed	FY2014–2015 Change
Metropolitan Wastewater - Muni	\$ 50,005,988	\$ 49,211,024	<b>\$ 49,020,523</b>	\$ (190,501)
Public Utilities	67,892,657	83,074,575	<b>85,852,279</b>	2,777,704
<b>Total</b>	<b>\$ 117,898,645</b>	<b>\$ 132,285,599</b>	<b>\$ 134,872,802</b>	<b>\$ 2,587,203</b>

### Department Personnel

	FY2013 Budget	FY2014 Budget	FY2015 Proposed	FY2014–2015 Change
Metropolitan Wastewater - Muni	285.00	242.00	<b>235.00</b>	(7.00)
Public Utilities	130.19	171.16	<b>174.23</b>	3.07
<b>Total</b>	<b>415.19</b>	<b>413.16</b>	<b>409.23</b>	<b>(3.93)</b>

### Significant Budget Adjustments

	FTE	Expenditures	Revenue
<b>Facility/Infrastructure Condition Assessments</b> Adjustment to reflect the addition of funding for facility and infrastructure condition assessment projects.	0.00	\$ 2,738,239	\$ -
<b>Repair and Maintenance Expenditures</b> Adjustment to reflect the addition of funding for repair and maintenance expenditures at various wastewater facilities.	0.00	800,000	-
<b>State Revolving Fund (SRF) Adjustment</b> Adjustment to reflect the addition of funding for SRF loan repayments.	0.00	760,646	-
<b>Enterprise Asset Management and GIS Support</b> Adjustment to reflect the addition of funding and staff support for the Enterprise Asset Management (EAM) and Geographic Information Systems (GIS) projects.	0.18	556,042	-
<b>Interagency Agreements</b> Adjustment to reflect the addition of non-personnel expenditures for annual payments for the Hale Avenue Treatment Facility and Municipal Transportation Agreements.	0.00	266,555	-

# Public Utilities

## Significant Budget Adjustments (Cont'd)

	FTE	Expenditures	Revenue
<b>Revegetation and Mitigation</b> Adjustment to reflect the addition of funding for revegetation and environmental mitigation projects.	0.00	224,458	-
<b>Customer Support Enhancements</b> Adjustment to reflect the addition of funding for a postage rate increase and other customer service enhancements.	0.00	208,000	-
<b>Non-Standard Hour Personnel Funding</b> Adjustment to expenditures according to a zero-based annual review of non-standard hour personnel funding requirements.	4.53	157,468	-
<b>Quality Assurance Workplan</b> Adjustment to reflect the addition of funding to support the Quality Assurance workplan and other employee services.	0.64	127,339	-
<b>Security Enhancements</b> Adjustment to reflect the addition of funding for security enhancements at water and wastewater facilities.	0.00	103,787	-
<b>Financial Contracts</b> Adjustment of funding for various financial contracts including the Cost of Service Study, use of funds and bond issuance support.	0.00	82,303	-
<b>Laboratory Supplies and Equipment</b> Adjustment to reflect the addition of funding for laboratory supplies, equipment and facility improvements.	0.00	42,000	-
<b>Program Manager</b> Addition of 1.00 Program Manager to coordinate and manage the Wastewater and Water Construction & Maintenance branch.	0.18	33,516	-
<b>Support for Potable Reuse Program</b> Adjustment to reflect the addition of staffing and support for the Potable Reuse Program.	0.10	24,707	-
<b>Graphic Designer</b> Addition of 1.00 Graphic Designer for the Public Utilities Department.	0.18	14,556	-
<b>Supplemental Cost of Living Adjustment (COLA)</b> Adjustment to reflect the allocation of the pay-go costs for the continued funding of the Supplemental COLA Benefit.	0.00	9,512	-
<b>Reclassification of IT Expenditures</b> Adjustment reflects the reclassification of information technology expenditures.	0.00	(16,500)	-
<b>Overtime Funding</b> Adjustment to expenditures according to projected overtime requirements.	0.00	(99,936)	-
<b>Non-Discretionary Adjustment</b> Adjustment to expenditure allocations that are determined outside of the department's direct control. These allocations are generally based on prior year expenditure trends and examples of these include utilities, insurance, and rent.	0.00	(267,803)	-

# Public Utilities

## Significant Budget Adjustments (Cont'd)

	FTE	Expenditures	Revenue
<b>Equipment/Support for Information Technology</b> Adjustment to expenditure allocations according to a zero-based annual review of information technology funding requirements and priority analyses.	0.00	(672,796)	-
<b>Salary and Benefit Adjustments</b> Adjustments to reflect the annualization of the Fiscal Year 2014 negotiated salary compensation schedule, changes to savings resulting from positions to be vacant for any period of the fiscal year, retirement contributions, retiree health contributions, and labor negotiation adjustments.	0.14	(686,149)	-
<b>Public Utilities Restructure</b> Reallocation among funds to more accurately reflect operational expenditures as well as an adjustment due to efficiencies realized.	(9.88)	(787,580)	-
<b>One-Time Reductions and Annualizations</b> Adjustment to reflect the removal of one-time revenues and expenditures, and the annualization of revenues and expenditures, implemented in Fiscal Year 2014.	0.00	(1,031,161)	-
<b>Revised Revenue</b> Adjustment to reflect Fiscal Year 2015 revenue projections.	0.00	-	(4,184,800)
<b>Total</b>	<b>(3.93)</b>	<b>\$ 2,587,203</b>	<b>\$ (4,184,800)</b>

## Expenditures by Category

	FY2013 Actual	FY2014 Budget	FY2015 Proposed	FY2014–2015 Change
<b>PERSONNEL</b>				
Personnel Cost	\$ 19,277,381	\$ 23,173,861	\$ 22,673,164	\$ (500,697)
Fringe Benefits	13,859,816	16,497,358	15,808,516	(688,842)
<b>PERSONNEL SUBTOTAL</b>	<b>33,137,197</b>	<b>39,671,219</b>	<b>38,481,680</b>	<b>(1,189,539)</b>
<b>NON-PERSONNEL</b>				
Supplies	\$ 3,501,284	\$ 4,678,035	\$ 5,038,315	\$ 360,280
Contracts	28,447,415	31,375,522	35,021,458	3,645,936
Information Technology	3,155,153	4,360,433	3,661,762	(698,671)
Energy and Utilities	5,159,210	5,033,856	6,260,181	1,226,325
Other	79,307	62,933	64,933	2,000
Transfers Out	43,690,549	46,150,929	45,458,325	(692,604)
Capital Expenditures	1,348,609	583,174	490,174	(93,000)
Debt	(620,078)	369,498	395,974	26,476
<b>NON-PERSONNEL SUBTOTAL</b>	<b>84,761,448</b>	<b>92,614,380</b>	<b>96,391,122</b>	<b>3,776,742</b>
<b>Total</b>	<b>\$ 117,898,645</b>	<b>\$ 132,285,599</b>	<b>\$ 134,872,802</b>	<b>\$ 2,587,203</b>

# Public Utilities

## Revenues by Category

	FY2013 Actual	FY2014 Budget	FY2015 Proposed	FY2014–2015 Change
Charges for Services	\$ 298,342,298	\$ 304,754,000	<b>\$ 306,813,000</b>	\$ 2,059,000
Fines Forfeitures and Penalties	76,746	-	-	-
Other Revenue	1,210,254	250,000	<b>187,000</b>	(63,000)
Rev from Money and Prop	2,471,207	1,223,000	<b>910,400</b>	(312,600)
Rev from Other Agencies	4,309,299	10,747,000	<b>4,878,800</b>	(5,868,200)
Transfers In	9,731,555	-	-	-
<b>Total</b>	<b>\$ 316,141,359</b>	<b>\$ 316,974,000</b>	<b>\$ 312,789,200</b>	<b>\$ (4,184,800)</b>

## Personnel Expenditures

Job Number	Job Title / Wages	FY2013 Budget	FY2014 Budget	FY2015 Proposed	Salary Range	Total
<b>FTE, Salaries, and Wages</b>						
20000011	Account Clerk	2.60	2.60	<b>2.60</b>	\$31,491 - \$37,918	\$ 96,575
20000007	Accountant 3	0.33	0.33	<b>0.18</b>	59,363 - 71,760	12,924
20000102	Accountant 4	0.22	0.22	<b>0.18</b>	66,768 - 88,982	16,020
20000012	Administrative Aide 1	1.22	1.22	<b>1.54</b>	36,962 - 44,533	67,220
20000024	Administrative Aide 2	4.07	4.40	<b>5.07</b>	42,578 - 51,334	246,472
20000057	Assistant Chemist	10.00	10.00	<b>10.00</b>	53,789 - 65,333	624,227
20001140	Assistant Department Director	0.18	0.18	<b>0.36</b>	31,741 - 173,971	50,398
20000070	Assistant Engineer-Civil	10.25	10.23	<b>10.46</b>	57,866 - 69,722	609,989
20000087	Assistant Engineer-Mechanical	0.18	0.16	<b>0.16</b>	57,866 - 69,722	11,160
20000080	Assistant Laboratory Technician	1.00	1.00	<b>1.00</b>	33,696 - 40,602	40,602
20000041	Assistant Management Analyst	0.18	0.18	<b>0.18</b>	44,470 - 54,059	9,732
20001228	Assistant Metropolitan Wastewater Director	0.18	0.18	<b>0.18</b>	31,741 - 173,971	25,200
20000140	Associate Chemist	4.00	4.50	<b>4.50</b>	62,005 - 75,067	336,675
20000311	Associate Department Human Resources Analyst	0.90	0.90	<b>0.90</b>	54,059 - 65,333	54,747
20000145	Associate Engineer-Civil	0.62	0.51	<b>0.26</b>	66,622 - 80,454	20,691
20000143	Associate Engineer-Civil	8.26	8.37	<b>8.91</b>	66,622 - 80,454	706,544
90000143	Associate Engineer-Civil - Hourly	0.06	0.00	<b>0.00</b>	66,622 - 80,454	-
20000150	Associate Engineer-Electrical	0.18	0.16	<b>0.16</b>	66,622 - 80,454	12,875
20000154	Associate Engineer-Mechanical	0.25	0.16	<b>0.16</b>	66,622 - 80,454	10,656
20000137	Associate Management Analyst	1.58	0.00	<b>0.00</b>	54,059 - 65,333	-
20000134	Associate Management Analyst	0.22	0.22	<b>0.18</b>	54,059 - 65,333	11,701
20000119	Associate Management Analyst	6.54	6.73	<b>6.79</b>	54,059 - 65,333	424,404
20000132	Associate Management Analyst	0.00	0.36	<b>0.36</b>	54,059 - 65,333	19,463
20000162	Associate Planner	1.00	0.67	<b>0.67</b>	56,722 - 68,536	38,003
20000649	Biologist 3	2.00	1.34	<b>1.34</b>	62,005 - 75,067	40,925
20000205	Building Service Supervisor	0.00	0.33	<b>0.33</b>	45,718 - 55,286	16,573
20000224	Building Service Technician	0.00	0.33	<b>0.33</b>	33,322 - 39,666	11,003
20000266	Cashier	2.50	2.50	<b>2.50</b>	31,491 - 37,918	88,612
20000236	Cement Finisher	1.00	1.00	<b>1.00</b>	43,451 - 52,083	51,302
20000539	Clerical Assistant 2	3.34	3.06	<b>2.94</b>	29,931 - 36,067	97,345
20000306	Code Compliance Officer	1.50	0.50	<b>0.00</b>	37,232 - 44,803	-



# Public Utilities

## Personnel Expenditures (Cont'd)

Job Number	Job Title / Wages	FY2013 Budget	FY2014 Budget	FY2015 Proposed	Salary Range	Total
20000307	Code Compliance Supervisor	0.50	0.00	<b>0.00</b>	42,890 - 51,334	-
20000829	Compliance and Metering Manager	1.00	1.00	<b>1.00</b>	73,445 - 88,837	88,838
20000801	Customer Information and Billing Manager	0.50	1.00	<b>1.00</b>	73,445 - 88,837	81,147
90000801	Customer Information and Billing Manager - Hourly	0.17	0.00	<b>0.00</b>	73,445 - 88,837	-
20000369	Customer Services Representative	17.50	22.00	<b>21.50</b>	32,968 - 39,811	782,170
90000369	Customer Services Representative - Hourly	4.00	2.50	<b>2.50</b>	32,968 - 39,811	82,420
20000366	Customer Services Supervisor	2.00	2.50	<b>2.50</b>	57,782 - 69,784	168,465
20001168	Deputy Director	2.04	2.37	<b>2.37</b>	46,966 - 172,744	281,339
90001168	Deputy Director - Hourly	0.23	0.00	<b>0.18</b>	46,966 - 172,744	19,774
20000429	Equipment Operator 1	30.00	30.00	<b>30.00</b>	37,690 - 45,115	1,342,316
20000428	Equipment Operator 1	1.00	1.00	<b>1.00</b>	37,690 - 45,115	44,213
20000430	Equipment Operator 2	12.00	12.00	<b>12.00</b>	41,350 - 49,462	587,693
20000436	Equipment Operator 3	2.00	2.00	<b>2.00</b>	43,160 - 51,667	103,334
20000418	Equipment Technician 1	11.00	11.00	<b>11.00</b>	36,005 - 43,139	470,862
20000423	Equipment Technician 2	10.00	10.00	<b>10.00</b>	39,499 - 47,091	419,581
20000431	Equipment Technician 3	1.00	1.00	<b>1.00</b>	43,368 - 51,813	51,036
20000924	Executive Secretary	0.18	0.18	<b>0.18</b>	43,555 - 52,666	9,336
90000924	Executive Secretary - Hourly	0.00	0.00	<b>0.06</b>	43,555 - 52,666	2,613
20000461	Field Representative	15.50	14.50	<b>14.00</b>	32,323 - 38,917	543,678
90000461	Field Representative - Hourly	3.25	3.25	<b>3.25</b>	32,323 - 38,917	105,051
20000483	General Water Utility Supervisor	4.00	4.00	<b>4.00</b>	59,342 - 71,760	283,546
20000487	Graphic Designer	0.00	0.00	<b>0.18</b>	43,264 - 51,979	7,788
20000502	Heavy Truck Driver 1	2.00	2.00	<b>1.00</b>	36,234 - 43,160	43,160
20000501	Heavy Truck Driver 2	0.00	0.00	<b>1.00</b>	37,565 - 45,302	-
20000178	Information Systems Administrator	0.19	0.19	<b>0.19</b>	73,466 - 88,982	16,908
20000290	Information Systems Analyst 2	2.40	2.71	<b>2.71</b>	54,059 - 65,333	174,878
20000293	Information Systems Analyst 3	1.33	1.33	<b>1.33</b>	59,363 - 71,760	77,065
20000998	Information Systems Analyst 4	0.95	0.76	<b>0.76</b>	66,768 - 80,891	61,488
20000515	Instrumentation and Control Technician	2.00	2.00	<b>0.00</b>	51,896 - 62,296	-
20000590	Laboratory Technician	9.00	9.00	<b>9.00</b>	40,622 - 49,067	372,621
90000589	Laborer - Hourly	0.00	0.00	<b>3.00</b>	29,182 - 34,757	87,548
90001073	Management Intern - Hourly	1.18	0.27	<b>1.47</b>	24,274 - 29,203	35,684
20000634	Organization Effectiveness Specialist 2	0.58	0.54	<b>0.54</b>	54,059 - 65,333	35,167
20000627	Organization Effectiveness Specialist 3	0.18	0.18	<b>0.54</b>	59,363 - 71,760	34,296
20000639	Organization Effectiveness Supervisor	0.18	0.18	<b>0.18</b>	66,768 - 80,891	14,556

# Public Utilities

## Personnel Expenditures (Cont'd)

Job Number	Job Title / Wages	FY2013 Budget	FY2014 Budget	FY2015 Proposed	Salary Range	Total
20000680	Payroll Specialist 2	1.80	1.80	<b>1.80</b>	34,611 - 41,787	75,022
20000173	Payroll Supervisor	0.36	0.36	<b>0.36</b>	39,686 - 48,069	17,172
20000701	Plant Process Control Electrician	10.00	10.00	<b>8.00</b>	51,896 - 62,296	491,360
20000703	Plant Process Control Supervisor	1.00	1.00	<b>1.00</b>	56,410 - 68,224	68,224
20000705	Plant Process Control Supervisor	5.36	5.18	<b>5.18</b>	56,410 - 68,224	346,854
20000687	Plant Technician 1	2.00	2.00	<b>0.00</b>	37,814 - 45,261	-
20000688	Plant Technician 2	2.00	2.00	<b>0.00</b>	41,454 - 49,504	-
20000689	Plant Technician 3	1.00	1.00	<b>0.00</b>	45,490 - 54,434	-
20000706	Plant Technician Supervisor	1.00	1.00	<b>0.00</b>	52,666 - 62,837	-
90000733	Power Plant Supervisor - Hourly	0.06	0.00	<b>0.00</b>	55,141 - 66,581	-
20000740	Principal Drafting Aide	0.72	0.54	<b>0.54</b>	50,003 - 60,549	31,856
20000743	Principal Engineering Aide	9.27	9.69	<b>9.66</b>	50,003 - 60,549	570,837
20000750	Principal Water Utility Supervisor	2.00	2.00	<b>2.00</b>	52,000 - 62,837	122,720
20001222	Program Manager	2.03	2.53	<b>3.07</b>	46,966 - 172,744	157,024
20000760	Project Assistant	1.00	0.67	<b>0.67</b>	57,866 - 69,722	46,717
20000761	Project Officer 1	2.00	1.34	<b>1.34</b>	66,622 - 80,454	106,176
20000763	Project Officer 2	1.18	0.83	<b>0.83</b>	76,794 - 92,851	76,835
20000783	Public Information Clerk	0.66	0.44	<b>0.36</b>	31,491 - 37,918	13,665
20001150	Public Utilities Director	0.18	0.18	<b>0.18</b>	59,155 - 224,099	33,839
20000319	Pump Station Operator	5.00	5.00	<b>5.00</b>	43,493 - 51,917	259,585
20000320	Pump Station Operator Supervisor	1.00	1.00	<b>1.00</b>	47,674 - 56,888	56,888
20000560	Recycling Program Manager	0.18	0.18	<b>0.18</b>	76,731 - 92,893	-
20000847	Safety Officer	0.36	0.36	<b>0.36</b>	57,907 - 69,930	24,927
20000854	Safety Representative 2	1.62	1.95	<b>1.95</b>	50,461 - 61,027	116,310
20001042	Safety and Training Manager	0.54	0.54	<b>0.54</b>	66,768 - 80,891	14,556
20000869	Senior Account Clerk	0.44	0.44	<b>0.44</b>	36,067 - 43,514	18,961
20000883	Senior Chemist	1.00	1.30	<b>1.30</b>	71,739 - 86,466	109,732
20000890	Senior Civil Engineer	0.00	0.00	<b>0.18</b>	76,794 - 92,851	13,825
20000885	Senior Civil Engineer	2.56	2.28	<b>2.28</b>	76,794 - 92,851	211,693
20000927	Senior Clerk/Typist	0.18	0.18	<b>0.00</b>	36,067 - 43,514	-
20000898	Senior Customer Services Representative	3.00	3.00	<b>2.50</b>	37,835 - 45,781	114,460
90000898	Senior Customer Services Representative - Hourly	0.17	0.00	<b>0.00</b>	37,835 - 45,781	-
20000312	Senior Department Human Resources Analyst	0.18	0.18	<b>0.18</b>	59,363 - 71,760	12,915
20000400	Senior Drafting Aide	1.48	1.48	<b>1.44</b>	44,429 - 53,706	72,198
20000900	Senior Engineering Aide	10.00	10.50	<b>11.00</b>	44,429 - 53,706	490,843
20000902	Senior Engineering Aide	3.00	0.00	<b>0.00</b>	44,429 - 53,706	-
20000015	Senior Management Analyst	3.69	4.32	<b>3.77</b>	59,363 - 71,760	249,958
90000015	Senior Management Analyst - Hourly	0.06	0.00	<b>0.00</b>	59,363 - 71,760	-
20000918	Senior Planner	1.00	0.67	<b>0.67</b>	65,354 - 79,019	47,338

# Public Utilities

## Personnel Expenditures (Cont'd)

Job Number	Job Title / Wages	FY2013 Budget	FY2014 Budget	FY2015 Proposed	Salary Range	Total
20000708	Senior Plant Technician Supervisor	0.36	0.18	<b>0.18</b>	60,070 - 72,467	12,853
20000916	Senior Public Information Officer	0.36	0.36	<b>0.18</b>	54,059 - 65,333	11,761
20000914	Senior Water Utility Supervisor	14.00	14.00	<b>14.00</b>	47,216 - 57,138	701,106
20000950	Stock Clerk	0.00	0.33	<b>0.33</b>	30,056 - 36,275	11,976
20000955	Storekeeper 1	0.00	0.33	<b>0.33</b>	34,611 - 41,517	13,703
90000964	Student Engineer - Hourly	0.09	0.00	<b>0.09</b>	26,707 - 32,011	2,404
20000313	Supervising Department Human Resources Analyst	0.18	0.18	<b>0.18</b>	66,768 - 80,891	14,556
20000995	Supervising Economist	0.23	0.23	<b>0.23</b>	66,768 - 80,891	18,600
20000990	Supervising Field Representative	0.50	0.50	<b>0.50</b>	35,651 - 42,890	11
20000970	Supervising Management Analyst	2.74	2.60	<b>2.89</b>	66,768 - 80,891	233,687
20000997	Supervising Meter Reader	1.00	1.00	<b>1.50</b>	37,253 - 44,720	67,086
90000997	Supervising Meter Reader - Hourly	0.17	0.00	<b>0.00</b>	37,253 - 44,720	-
20001021	Supervising Public Information Officer	0.50	0.54	<b>0.54</b>	59,363 - 71,760	38,754
20000333	Supervising Wastewater Pretreatment Inspector	3.00	3.00	<b>3.00</b>	66,685 - 80,870	242,610
21000177	Trainer	0.00	1.58	<b>1.72</b>	54,059 - 65,333	103,803
20001041	Training Supervisor	0.18	0.18	<b>0.36</b>	59,363 - 71,760	25,830
20001051	Utility Worker 1	46.00	46.00	<b>46.00</b>	30,534 - 36,296	1,608,694
20000323	Wastewater Pretreatment Inspector 2	8.00	8.00	<b>8.00</b>	55,078 - 66,768	392,169
20000326	Wastewater Pretreatment Inspector 3	0.00	0.00	<b>1.00</b>	60,674 - 73,507	63,648
20000325	Wastewater Pretreatment Inspector 3	5.00	5.00	<b>4.00</b>	60,674 - 73,507	289,493
20000523	Wastewater Pretreatment Program Manager	1.00	1.00	<b>1.00</b>	72,966 - 88,546	87,218
20001063	Water Utility Supervisor	14.00	14.00	<b>14.00</b>	43,472 - 51,979	701,054
20001065	Water Utility Worker	31.00	31.00	<b>31.00</b>	33,322 - 39,666	1,033,907
20000756	Word Processing Operator	5.58	5.41	<b>5.74</b>	31,491 - 37,918	217,665
	Bilingual - Regular					20,781
	Exceptional Performance Pay-Classified					7,275
	Exceptional Performance Pay-Unclassified					570
	Geographic Info Cert Pay					1,095
	Night Shift Pay					21,539
	Overtime Budgeted					2,336,155
	Plant/Tank Vol Cert Pay					71,844
	Reg Pay For Engineers					105,972
	Split Shift Pay					26,229
	Termination Pay Annual Leave					36,017
<b>FTE, Salaries, and Wages Subtotal</b>		<b>415.19</b>	<b>413.16</b>	<b>409.23</b>		<b>\$ 22,673,164</b>

# Public Utilities

	FY2013 Actual	FY2014 Budget	FY2015 Proposed	FY2014–2015 Change
<b>Fringe Benefits</b>				
Employee Offset Savings	\$ 115,981	\$ 164,008	\$ 130,844	\$ (33,164)
Flexible Benefits	2,060,278	2,638,339	2,890,000	251,661
Long-Term Disability	105,907	110,285	69,700	(40,585)
Medicare	311,424	276,683	273,750	(2,933)
Other	3,707	-	-	-
Other Post-Employment Benefits	2,318,349	2,445,124	2,374,156	(70,968)
Retiree Medical Trust	1,785	1,674	2,787	1,113
Retirement 401 Plan	6,030	6,565	6,203	(362)
Retirement ADC	6,501,950	8,345,743	7,683,917	(661,826)
Retirement DROP	73,001	75,291	83,000	7,709
Retirement Offset Contribution	33,417	-	-	-
Risk Management Administration	371,962	370,531	401,637	31,106
Supplemental Pension Savings Plan	1,112,838	1,118,850	1,117,300	(1,550)
Unemployment Insurance	54,015	58,686	40,028	(18,658)
Workers' Compensation	789,172	885,579	735,194	(150,385)
<b>Fringe Benefits Subtotal</b>	<b>\$ 13,859,816</b>	<b>\$ 16,497,358</b>	<b>\$ 15,808,516</b>	<b>\$ (688,842)</b>
<b>Total Personnel Expenditures</b>			<b>\$ 38,481,680</b>	

## Sewer Utility - AB 1600 Fund

### Revenues by Category

	FY2013 Actual	FY2014 Budget	FY2015 Proposed	FY2014–2015 Change
Charges for Services	\$ 14,041,093	\$ -	\$ -	\$ -
Rev from Money and Prop	(263,190)	-	-	-
<b>Total</b>	<b>\$ 13,777,903</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>

## Water Utility - AB 1600 Fund

### Revenues by Category

	FY2013 Actual	FY2014 Budget	FY2015 Proposed	FY2014–2015 Change
Charges for Services	\$ 11,704,419	\$ -	\$ -	\$ -
Rev from Money and Prop	134,940	-	-	-
<b>Total</b>	<b>\$ 11,839,359</b>	<b>\$ -</b>	<b>\$ -</b>	<b>\$ -</b>

# Public Utilities

## Water Utility Operating Fund

### Department Expenditures

	FY2013 Actual	FY2014 Budget	FY2015 Proposed	FY2014–2015 Change
Public Utilities	\$ 121,638,039	\$ 142,075,681	<b>\$ 148,120,458</b>	\$ 6,044,777
Water	287,660,695	297,214,865	<b>313,826,583</b>	16,611,718
<b>Total</b>	<b>\$ 409,298,734</b>	<b>\$ 439,290,546</b>	<b>\$ 461,947,041</b>	<b>\$ 22,656,495</b>

### Department Personnel

	FY2013 Budget	FY2014 Budget	FY2015 Proposed	FY2014–2015 Change
Public Utilities	252.86	285.23	<b>300.03</b>	14.80
Water	455.58	417.85	<b>421.70</b>	3.85
<b>Total</b>	<b>708.44</b>	<b>703.08</b>	<b>721.73</b>	<b>18.65</b>

### Significant Budget Adjustments

	FTE	Expenditures	Revenue
<b>Water Purchases</b> Adjustment to reflect an increase in water purchases due to water rate increases by the Metropolitan Water District and San Diego County Water Authority.	0.00	\$ 17,284,946	\$ -
<b>Facility/Infrastructure Condition Assessments</b> Adjustment to reflect the addition of funding for facility and infrastructure condition assessment projects.	0.00	3,991,508	-
<b>Support for Potable Reuse Program</b> Adjustment to reflect the addition of staffing and support for the Potable Reuse Program.	2.24	2,145,757	-
<b>Sweetwater Settlement</b> Addition of funding for the City's Fiscal Year 2015 contribution to the Sweetwater Desalination Facility pursuant to the 2013 Settlement Agreement.	0.00	2,000,000	-
<b>Repair and Maintenance Expenditures</b> Adjustment to reflect the addition of funding for repair and maintenance expenditures at various wastewater facilities.	0.00	1,102,500	-
<b>State Revolving Fund (SRF) Adjustment</b> Adjustment to reflect the addition of funding for SRF loan repayments.	0.00	884,069	-
<b>Enterprise Asset Management and GIS Support</b> Adjustment to reflect the addition of funding and staff support for the Enterprise Asset Management (EAM) and Geographic Information Systems (GIS) projects.	0.49	604,671	-
<b>Scientific and Planning Studies</b> Adjustment to reflect the addition of funding for various scientific and planning studies.	0.00	502,459	-
<b>Revegetation and Mitigation</b> Adjustment to reflect the addition of funding for revegetation and environmental mitigation projects.	0.00	415,000	-
<b>Laboratory Supplies and Equipment</b> Adjustment to reflect the addition of funding for laboratory supplies, equipment and facility improvements.	0.00	361,000	-

# Public Utilities

## Significant Budget Adjustments (Cont'd)

	FTE	Expenditures	Revenue
<b>Security Enhancements</b> Adjustment to reflect the addition of funding for security enhancements at water and wastewater facilities.	0.00	282,530	-
<b>Quality Assurance Workplan</b> Adjustment to reflect the addition of funding to support the Quality Assurance workplan and other employee services.	1.71	268,364	-
<b>Conservation Programs</b> Adjustment to reflect the addition of staffing and support for conservation outreach and rebate programs.	2.00	262,596	-
<b>Non-Standard Hour Personnel Funding</b> Adjustment to expenditures according to a zero-based annual review of non-standard hour personnel funding requirements.	7.03	252,499	-
<b>Non-Discretionary Adjustment</b> Adjustment to expenditure allocations that are determined outside of the department's direct control. These allocations are generally based on prior year expenditure trends and examples of these include utilities, insurance, and rent.	0.00	239,232	-
<b>Customer Support Enhancements</b> Adjustment to reflect the addition of funding for a postage rate increase and other customer service enhancements.	0.00	208,000	-
<b>Financial Contracts</b> Adjustment of funding for various financial contracts including the Cost of Service Study, use of funds and bond issuance support.	0.00	204,700	-
<b>Support for Reservoir Maintenance and Operation</b> Addition of 2.00 Water System Technicians to support reservoir maintenance and operation.	2.00	179,298	-
<b>Public Utilities Restructure</b> Reallocation among funds to more accurately reflect operational expenditures as well as an adjustment due to efficiencies realized.	0.68	147,631	-
<b>Continuation of Core Operations</b> Adjustment to reflect the addition of staffing for the continuation of core operations.	1.00	97,854	-
<b>Program Manager</b> Addition of 1.00 Program Manager to coordinate and manage the Wastewater and Water Construction & Maintenance branch.	0.49	91,244	-
<b>Graphic Designer</b> Addition of 1.00 Graphic Designer for the Public Utilities Department.	0.49	39,628	-
<b>Reclassification of IT Expenditures</b> Adjustment reflects the reclassification of information technology expenditures.	0.00	33,380	-
<b>Overtime Funding</b> Adjustment to expenditures according to projected overtime requirements.	0.00	20,000	-



# Public Utilities

## Significant Budget Adjustments (Cont'd)

	FTE	Expenditures	Revenue
<b>Supplemental Cost of Living Adjustment (COLA)</b> Adjustment to reflect the allocation of the pay-go costs for the continued funding of the Supplemental COLA Benefit.	0.00	15,332	-
<b>Equipment/Support for Information Technology</b> Adjustment to expenditure allocations according to a zero-based annual review of information technology funding requirements and priority analyses.	0.00	(322,981)	-
<b>Salary and Benefit Adjustments</b> Adjustments to reflect the annualization of the Fiscal Year 2014 negotiated salary compensation schedule, changes to savings resulting from positions to be vacant for any period of the fiscal year, retirement contributions, retiree health contributions, and labor negotiation adjustments.	0.52	(1,127,340)	-
<b>One-Time Reductions and Annualizations</b> Adjustment to reflect the removal of one-time revenues and expenditures, and the annualization of revenues and expenditures, implemented in Fiscal Year 2014.	0.00	(7,527,382)	(3,377,269)
<b>Revised Revenue</b> Adjustment to reflect Fiscal Year 2015 revenue projections.	0.00	-	45,400,800
<b>Total</b>	<b>18.65</b>	<b>\$ 22,656,495</b>	<b>\$ 42,023,531</b>

## Expenditures by Category

	FY2013 Actual	FY2014 Budget	FY2015 Proposed	FY2014–2015 Change
<b>PERSONNEL</b>				
Personnel Cost	\$ 36,685,995	\$ 39,633,086	\$ 40,457,947	\$ 824,861
Fringe Benefits	25,346,130	28,474,086	28,216,216	(257,870)
<b>PERSONNEL SUBTOTAL</b>	<b>62,032,125</b>	<b>68,107,172</b>	<b>68,674,163</b>	<b>566,991</b>
<b>NON-PERSONNEL</b>				
Supplies	\$ 196,980,949	\$ 202,392,258	\$ 218,304,622	\$ 15,912,364
Contracts	60,806,359	72,008,751	78,231,304	6,222,553
Information Technology	5,508,954	7,823,086	7,436,096	(386,990)
Energy and Utilities	9,735,328	11,227,936	11,925,805	697,869
Other	1,985,528	1,993,428	2,113,396	119,968
Appropriated Reserve	-	3,500,000	3,500,000	-
Transfers Out	70,403,324	69,793,546	68,669,735	(1,123,811)
Capital Expenditures	315,378	2,067,834	2,688,834	621,000
Debt	1,530,789	376,535	403,086	26,551
<b>NON-PERSONNEL SUBTOTAL</b>	<b>347,266,609</b>	<b>371,183,374</b>	<b>393,272,878</b>	<b>22,089,504</b>
<b>Total</b>	<b>\$ 409,298,734</b>	<b>\$ 439,290,546</b>	<b>\$ 461,947,041</b>	<b>\$ 22,656,495</b>

# Public Utilities

## Revenues by Category

	FY2013 Actual	FY2014 Budget	FY2015 Proposed	FY2014–2015 Change
Charges for Services	\$ 410,185,222	\$ 412,676,269	\$ 461,986,400	\$ 49,310,131
Fines Forfeitures and Penalties	1,558,024	-	-	-
Other Revenue	12,120,422	325,000	325,000	-
Property Tax Revenue	(33,339)	-	-	-
Rev from Federal Agencies	1,835,595	-	-	-
Rev from Money and Prop	7,401,300	6,775,000	7,229,400	454,400
Rev from Other Agencies	815,944	7,831,000	90,000	(7,741,000)
Transfers In	2,857,059	-	-	-
<b>Total</b>	<b>\$ 436,740,226</b>	<b>\$ 427,607,269</b>	<b>\$ 469,630,800</b>	<b>\$ 42,023,531</b>

## Personnel Expenditures

Job Number	Job Title / Wages	FY2013 Budget	FY2014 Budget	FY2015 Proposed	Salary Range	Total
<b>FTE, Salaries, and Wages</b>						
20000011	Account Clerk	4.89	4.89	<b>4.89</b>	\$31,491 - \$37,918	\$ 181,784
20000007	Accountant 3	1.60	0.60	<b>0.49</b>	59,363 - 71,760	35,160
20000102	Accountant 4	0.40	0.40	<b>0.49</b>	66,768 - 88,982	43,597
20000012	Administrative Aide 1	0.40	0.40	<b>2.20</b>	36,962 - 44,533	90,911
20000024	Administrative Aide 2	9.65	9.64	<b>10.65</b>	42,578 - 51,334	521,810
20000057	Assistant Chemist	12.00	12.00	<b>13.00</b>	53,789 - 65,333	794,709
20001140	Assistant Department Director	1.49	1.49	<b>0.98</b>	31,741 - 173,971	137,204
20000072	Assistant Engineer-Civil	1.00	0.00	<b>0.00</b>	57,866 - 69,722	-
20000070	Assistant Engineer-Civil	31.07	24.16	<b>24.32</b>	57,866 - 69,722	1,636,050
21000176	Assistant Engineer-Corrosion	0.00	1.00	<b>1.00</b>	57,866 - 69,722	-
20000087	Assistant Engineer-Mechanical	0.49	0.23	<b>0.23</b>	57,866 - 69,722	16,033
20000041	Assistant Management Analyst	0.49	0.49	<b>0.49</b>	44,470 - 54,059	26,484
20001228	Assistant Metropolitan Wastewater Director	0.49	0.49	<b>0.49</b>	31,741 - 173,971	68,602
20000109	Assistant Reservoir Keeper	8.00	8.00	<b>8.00</b>	34,944 - 41,662	283,277
20000140	Associate Chemist	4.00	4.25	<b>4.25</b>	62,005 - 75,067	302,187
90000140	Associate Chemist - Hourly	0.00	0.35	<b>0.35</b>	62,005 - 75,067	26,274
20000311	Associate Department Human Resources Analyst	2.45	2.45	<b>2.45</b>	54,059 - 65,333	149,022
20000143	Associate Engineer-Civil	19.53	18.19	<b>19.59</b>	66,622 - 80,454	1,543,948
20000145	Associate Engineer-Civil	1.29	1.09	<b>0.74</b>	66,622 - 80,454	58,957
90000143	Associate Engineer-Civil - Hourly	0.17	0.00	<b>0.00</b>	66,622 - 80,454	-
20000350	Associate Engineer-Corrosion	2.00	2.00	<b>2.00</b>	66,622 - 80,454	80,454
20000150	Associate Engineer-Electrical	0.49	0.23	<b>0.23</b>	66,622 - 80,454	18,503
20000154	Associate Engineer-Mechanical	0.30	0.23	<b>0.23</b>	66,622 - 80,454	15,324
20000119	Associate Management Analyst	18.53	18.51	<b>20.27</b>	54,059 - 65,333	1,151,077
20000132	Associate Management Analyst	0.00	0.39	<b>0.39</b>	54,059 - 65,333	21,084
20000137	Associate Management Analyst	3.44	0.00	<b>0.00</b>	54,059 - 65,333	-
20000134	Associate Management Analyst	0.40	0.40	<b>0.49</b>	54,059 - 65,333	31,861
20000162	Associate Planner	1.68	1.67	<b>1.67</b>	56,722 - 68,536	110,979
20000655	Biologist 2	8.00	8.00	<b>8.00</b>	53,726 - 65,333	519,724

# Public Utilities

## Personnel Expenditures (Cont'd)

Job Number	Job Title / Wages	FY2013 Budget	FY2014 Budget	FY2015 Proposed	Salary Range	Total
20000649	Biologist 3	0.00	0.42	<b>0.42</b>	62,005 - 75,067	12,829
20000648	Biologist 3	2.00	2.00	<b>2.00</b>	62,005 - 75,067	142,085
20000205	Building Service Supervisor	0.00	0.33	<b>0.33</b>	45,718 - 55,286	16,573
20000224	Building Service Technician	0.00	0.33	<b>0.33</b>	33,322 - 39,666	10,992
20000234	Carpenter	2.00	2.00	<b>2.00</b>	43,451 - 52,000	52,000
20000266	Cashier	2.50	2.50	<b>2.50</b>	31,491 - 37,918	88,602
20000236	Cement Finisher	1.00	1.00	<b>1.00</b>	43,451 - 52,083	52,083
20000539	Clerical Assistant 2	8.20	8.09	<b>8.36</b>	29,931 - 36,067	259,966
20000306	Code Compliance Officer	1.50	2.50	<b>1.00</b>	37,232 - 44,803	44,803
20000307	Code Compliance Supervisor	0.50	1.00	<b>1.00</b>	42,890 - 51,334	46,759
20000829	Compliance and Metering Manager	1.00	1.00	<b>1.00</b>	73,445 - 88,837	88,836
20000801	Customer Information and Billing Manager	0.50	1.00	<b>1.00</b>	73,445 - 88,837	81,135
90000801	Customer Information and Billing Manager - Hourly	0.17	0.00	<b>0.00</b>	73,445 - 88,837	-
20000369	Customer Services Representative	17.50	23.50	<b>23.00</b>	32,968 - 39,811	841,850
90000369	Customer Services Representative - Hourly	4.00	2.50	<b>2.50</b>	32,968 - 39,811	82,420
20000366	Customer Services Supervisor	2.00	2.50	<b>2.50</b>	57,782 - 69,784	168,453
20001168	Deputy Director	4.82	5.03	<b>5.03</b>	46,966 - 172,744	600,573
90001168	Deputy Director - Hourly	0.34	0.00	<b>0.17</b>	46,966 - 172,744	18,675
20000430	Equipment Operator 2	11.00	11.00	<b>11.00</b>	41,350 - 49,462	443,427
20000418	Equipment Technician 1	22.00	18.00	<b>15.00</b>	36,005 - 43,139	642,986
20000423	Equipment Technician 2	3.00	2.00	<b>2.00</b>	39,499 - 47,091	94,182
20000924	Executive Secretary	0.49	0.49	<b>0.49</b>	43,555 - 52,666	25,428
90000924	Executive Secretary - Hourly	0.00	0.00	<b>0.17</b>	43,555 - 52,666	7,404
20000461	Field Representative	17.02	16.69	<b>17.19</b>	32,323 - 38,917	665,663
90000461	Field Representative - Hourly	3.25	3.25	<b>3.25</b>	32,323 - 38,917	105,051
20000822	Golf Course Manager	2.00	2.00	<b>2.00</b>	59,488 - 71,760	142,728
90000819	Golf Course Manager - Hourly	0.29	0.26	<b>0.25</b>	59,488 - 71,760	17,940
20000487	Graphic Designer	0.00	0.00	<b>0.49</b>	43,264 - 51,979	21,199
20000501	Heavy Truck Driver 2	2.00	2.00	<b>2.00</b>	37,565 - 45,302	44,622
20000513	Hydrography Aide	1.00	1.00	<b>1.00</b>	42,536 - 51,251	51,251
20000178	Information Systems Administrator	0.47	0.47	<b>0.47</b>	73,466 - 88,982	41,821
20000290	Information Systems Analyst 2	5.20	5.23	<b>5.23</b>	54,059 - 65,333	336,416
20000293	Information Systems Analyst 3	3.29	3.29	<b>3.29</b>	59,363 - 71,760	190,672
20000998	Information Systems Analyst 4	2.35	1.88	<b>1.88</b>	66,768 - 80,891	152,064
20000514	Instrumentation and Control Supervisor	1.00	1.00	<b>1.00</b>	56,410 - 68,224	68,057
20000515	Instrumentation and Control Technician	8.00	8.00	<b>8.00</b>	51,896 - 62,296	429,148
20000497	Irrigation Specialist	2.52	2.19	<b>4.19</b>	37,814 - 45,261	173,437

# Public Utilities

## Personnel Expenditures (Cont'd)

Job Number	Job Title / Wages	FY2013 Budget	FY2014 Budget	FY2015 Proposed	Salary Range	Total
20000590	Laboratory Technician	9.00	9.00	<b>10.00</b>	40,622 - 49,067	292,440
90000589	Laborer - Hourly	2.94	3.00	<b>8.50</b>	29,182 - 34,757	248,052
20000579	Lake Aide 1	1.00	1.00	<b>0.00</b>	23,483 - 27,768	(11)
90000579	Lake Aide 1 - Hourly	7.84	8.00	<b>6.00</b>	23,483 - 27,768	140,900
20000564	Lake Aide 2	13.00	13.00	<b>13.00</b>	27,602 - 32,677	375,811
20000616	Lakes Program Manager	1.00	1.00	<b>1.00</b>	73,466 - 88,941	88,941
90001073	Management Intern - Hourly	5.44	4.77	<b>8.09</b>	24,274 - 29,203	196,371
20000028	Management Trainee	0.00	0.00	<b>0.09</b>	38,750 - 46,738	4,223
20000622	Marine Mechanic	1.00	1.00	<b>1.00</b>	44,366 - 53,206	53,206
20000165	Multimedia Production Specialist	0.84	0.73	<b>0.73</b>	43,264 - 51,979	37,941
20000634	Organization Effectiveness Specialist 2	1.38	1.47	<b>1.47</b>	54,059 - 65,333	95,739
20000627	Organization Effectiveness Specialist 3	0.49	0.49	<b>0.88</b>	59,363 - 71,760	58,308
20000639	Organization Effectiveness Supervisor	0.49	0.49	<b>0.49</b>	66,768 - 80,891	39,636
20000680	Payroll Specialist 2	4.90	4.90	<b>4.90</b>	34,611 - 41,787	204,136
20000173	Payroll Supervisor	0.98	0.98	<b>0.98</b>	39,686 - 48,069	46,759
20000701	Plant Process Control Electrician	4.84	4.00	<b>4.00</b>	51,896 - 62,296	249,184
20000705	Plant Process Control Supervisor	0.98	0.49	<b>0.49</b>	56,410 - 68,224	30,431
20000703	Plant Process Control Supervisor	1.00	1.00	<b>1.00</b>	56,410 - 68,224	68,224
90000733	Power Plant Supervisor - Hourly	0.17	0.00	<b>0.00</b>	55,141 - 66,581	-
21000184	Prin Backflow & Cross Connection Specialist	0.00	0.73	<b>0.73</b>	50,003 - 60,549	43,547
20000740	Principal Drafting Aide	1.96	2.47	<b>2.47</b>	50,003 - 60,549	147,290
21000100	Principal Engineering Aide	0.84	0.00	<b>0.00</b>	50,003 - 60,549	-
20000746	Principal Engineering Aide	1.00	1.00	<b>1.00</b>	50,003 - 60,549	59,338
20000743	Principal Engineering Aide	6.33	6.32	<b>6.40</b>	50,003 - 60,549	386,866
20001222	Program Manager	4.45	4.83	<b>6.80</b>	46,966 - 172,744	660,070
20000760	Project Assistant	0.00	0.21	<b>0.21</b>	57,866 - 69,722	14,641
20000761	Project Officer 1	0.00	0.42	<b>0.42</b>	66,622 - 80,454	33,288
90000761	Project Officer 1 - Hourly	0.29	0.25	<b>0.25</b>	66,622 - 80,454	20,114
20000763	Project Officer 2	0.49	0.44	<b>0.44</b>	76,794 - 92,851	40,542
20000766	Project Officer 2	1.68	1.46	<b>1.46</b>	76,794 - 92,851	135,568
20000783	Public Information Clerk	2.20	2.53	<b>2.71</b>	31,491 - 37,918	102,763
20000784	Public Information Officer	0.00	0.00	<b>0.50</b>	43,514 - 52,707	21,757
20001150	Public Utilities Director	0.49	0.49	<b>0.49</b>	59,155 - 224,099	92,122
20000373	Ranger/Diver 1	3.00	3.00	<b>3.00</b>	42,494 - 51,272	142,627
90000373	Ranger/Diver 1 - Hourly	0.35	0.35	<b>0.35</b>	42,494 - 51,272	14,873
20000375	Ranger/Diver 2	2.00	2.00	<b>2.00</b>	46,634 - 56,347	112,694
20000376	Ranger/Diver Supervisor	1.00	1.00	<b>1.00</b>	53,726 - 64,958	64,958
20000559	Recycling Program Manager	0.84	0.73	<b>0.73</b>	76,731 - 92,893	67,813
20000560	Recycling Program Manager	0.49	0.49	<b>0.49</b>	76,731 - 92,893	-
20000840	Reservoir Keeper	8.00	8.00	<b>8.00</b>	40,019 - 47,819	370,321

# Public Utilities

## Personnel Expenditures (Cont'd)

Job Number	Job Title / Wages	FY2013 Budget	FY2014 Budget	FY2015 Proposed	Salary Range	Total
20000847	Safety Officer	0.98	0.98	<b>0.98</b>	57,907 - 69,930	67,844
20000854	Safety Representative 2	4.41	4.74	<b>4.74</b>	50,461 - 61,027	282,463
20001042	Safety and Training Manager	1.47	1.47	<b>1.47</b>	66,768 - 80,891	39,636
20000869	Senior Account Clerk	0.80	0.80	<b>0.80</b>	36,067 - 43,514	34,456
21000183	Senior Backflow & Cross Connection Specialist	0.00	10.38	<b>12.38</b>	44,429 - 53,706	487,146
20000828	Senior Biologist	0.84	1.23	<b>1.23</b>	71,760 - 86,466	106,357
20000883	Senior Chemist	1.00	1.25	<b>1.25</b>	71,739 - 86,466	107,648
20000885	Senior Civil Engineer	6.46	4.37	<b>4.87</b>	76,794 - 92,851	441,555
20000890	Senior Civil Engineer	0.00	0.00	<b>0.49</b>	76,794 - 92,851	37,634
90000885	Senior Civil Engineer - Hourly	0.29	0.00	<b>0.00</b>	76,794 - 92,851	-
20000927	Senior Clerk/Typist	0.49	0.49	<b>0.00</b>	36,067 - 43,514	-
21000185	Senior Corrosion Specialist	0.00	1.00	<b>1.00</b>	76,794 - 92,851	92,851
20000898	Senior Customer Services Representative	3.00	3.00	<b>3.50</b>	37,835 - 45,781	160,226
90000898	Senior Customer Services Representative - Hourly	0.17	0.00	<b>0.00</b>	37,835 - 45,781	-
20000312	Senior Department Human Resources Analyst	0.49	0.49	<b>0.49</b>	59,363 - 71,760	35,166
20000400	Senior Drafting Aide	3.83	3.83	<b>3.92</b>	44,429 - 53,706	196,648
20000906	Senior Electrical Engineer	1.00	0.00	<b>0.00</b>	76,794 - 92,851	-
20000902	Senior Engineering Aide	7.20	0.00	<b>0.00</b>	44,429 - 53,706	-
20000900	Senior Engineering Aide	1.00	0.50	<b>0.00</b>	44,429 - 53,706	-
20000015	Senior Management Analyst	10.33	10.51	<b>10.37</b>	59,363 - 71,760	706,664
90000015	Senior Management Analyst - Hourly	0.17	0.00	<b>0.00</b>	59,363 - 71,760	-
20000918	Senior Planner	0.84	0.94	<b>0.94</b>	65,354 - 79,019	71,653
20000920	Senior Planner	2.52	2.19	<b>2.19</b>	65,354 - 79,019	168,303
20000708	Senior Plant Technician Supervisor	0.98	0.49	<b>0.49</b>	60,070 - 72,467	34,971
20000916	Senior Public Information Officer	1.82	1.71	<b>1.22</b>	54,059 - 65,333	77,461
21000178	Senior Water Distribution Operations Supervisor	0.00	1.00	<b>1.00</b>	77,293 - 93,517	89,190
21000150	Senior Water Operations Supervisor	1.00	0.00	<b>0.00</b>	77,293 - 93,517	-
20001060	Senior Water Operations Supervisor	3.00	3.00	<b>3.00</b>	77,293 - 93,517	277,278
20000950	Stock Clerk	0.00	0.33	<b>0.33</b>	30,056 - 36,275	11,975
20000955	Storekeeper 1	0.00	0.33	<b>0.33</b>	34,611 - 41,517	13,703
90000964	Student Engineer - Hourly	1.04	0.00	<b>1.23</b>	26,707 - 32,011	32,851
90001146	Student Intern - Hourly	0.49	0.70	<b>0.00</b>	18,616 - 22,318	-
20000313	Supervising Department Human Resources Analyst	0.49	0.49	<b>0.49</b>	66,768 - 80,891	39,636
20000995	Supervising Economist	0.36	0.36	<b>0.36</b>	66,768 - 80,891	29,124
20000990	Supervising Field Representative	1.34	1.23	<b>1.23</b>	35,651 - 42,890	31,298

# Public Utilities

## Personnel Expenditures (Cont'd)

Job Number	Job Title / Wages	FY2013 Budget	FY2014 Budget	FY2015 Proposed	Salary Range	Total
20000970	Supervising Management Analyst	4.93	4.71	<b>5.13</b>	66,768 - 80,891	407,429
20000985	Supervising Management Analyst	0.84	0.73	<b>0.73</b>	66,768 - 80,891	59,051
20000997	Supervising Meter Reader	2.00	2.00	<b>1.50</b>	37,253 - 44,720	67,074
90000997	Supervising Meter Reader - Hourly	0.17	0.00	<b>0.00</b>	37,253 - 44,720	-
20001021	Supervising Public Information Officer	2.34	1.47	<b>1.47</b>	59,363 - 71,760	105,498
21000177	Trainer	0.00	3.44	<b>3.96</b>	54,059 - 65,333	241,960
20001041	Training Supervisor	0.49	0.49	<b>0.39</b>	59,363 - 71,760	27,990
20000317	Water Distribution Operations Supervisor	1.00	1.00	<b>1.00</b>	54,766 - 65,374	65,374
20000316	Water Distribution Operator	6.00	6.00	<b>6.00</b>	47,632 - 56,867	333,839
20001059	Water Operations Supervisor	3.00	3.00	<b>3.00</b>	68,037 - 81,307	243,921
20001061	Water Plant Operator	24.00	24.00	<b>24.00</b>	59,134 - 70,699	1,612,782
20000932	Water Production Superintendent	2.00	2.00	<b>2.00</b>	81,578 - 98,675	191,621
90000932	Water Production Superintendent - Hourly	0.00	0.00	<b>0.35</b>	81,578 - 98,675	28,552
20000006	Water Systems District Manager	3.00	3.00	<b>3.00</b>	62,504 - 75,130	222,062
20000003	Water Systems Technician 3	152.00	157.00	<b>159.00</b>	41,454 - 49,504	6,548,043
20000004	Water Systems Technician 4	54.00	54.00	<b>56.00</b>	47,632 - 56,867	2,855,511
20000005	Water Systems Technician Supervisor	17.00	17.00	<b>17.00</b>	54,766 - 65,374	1,091,653
20001058	Welder	2.00	2.00	<b>2.00</b>	44,366 - 53,206	106,412
20000756	Word Processing Operator	16.00	15.38	<b>11.98</b>	31,491 - 37,918	381,481
	AWWA WDP Cert Pay					31,616
	Backflow Cert					8,320
	Bilingual - Regular					27,797
	Cross Connection Cert					9,360
	Emergency Medical Tech					28,489
	Exceptional Performance Pay-Classified					18,949
	Exceptional Performance Pay-Unclassified					1,832
	Geographic Info Cert Pay					5,990
	Night Shift Pay					16,739
	Overtime Budgeted					2,544,363
	Plant/Tank Vol Cert Pay					26,698
	Reg Pay For Engineers					277,532
	Split Shift Pay					92,013
	Termination Pay Annual Leave					43,509
	Vacation Pay In Lieu					165,000
	Welding Certification					11,345
<b>FTE, Salaries, and Wages Subtotal</b>		<b>708.44</b>	<b>703.07</b>	<b>721.72</b>		<b>\$ 40,457,947</b>



## Public Utilities

	FY2013 Actual	FY2014 Budget	FY2015 Proposed	FY2014–2015 Change
<b>Fringe Benefits</b>				
Employee Offset Savings	\$ 247,231	\$ 308,832	\$ 256,815	\$ (52,017)
Flexible Benefits	3,684,049	4,377,261	4,950,699	573,438
Long-Term Disability	203,889	196,160	128,365	(67,795)
Medicare	559,165	474,801	493,995	19,194
Other	499	-	-	-
Other Post-Employment Benefits	4,053,870	4,033,128	4,053,468	20,340
Retiree Medical Trust	5,660	4,578	8,438	3,860
Retirement 401 Plan	20,558	18,109	22,825	4,716
Retirement ADC	12,354,620	14,837,821	14,154,178	(683,643)
Retirement DROP	113,945	113,189	113,275	86
Retirement Offset Contribution	67,051	-	-	-
Risk Management Administration	650,303	611,756	685,671	73,915
Supplemental Pension Savings Plan	2,032,791	1,960,033	2,040,631	80,598
Unemployment Insurance	103,956	104,013	73,283	(30,730)
Unused Sick Leave	(1)	-	-	-
Workers' Compensation	1,248,545	1,434,405	1,234,573	(199,832)
<b>Fringe Benefits Subtotal</b>	<b>\$ 25,346,130</b>	<b>\$ 28,474,086</b>	<b>\$ 28,216,216</b>	<b>\$ (257,870)</b>
<b>Total Personnel Expenditures</b>			<b>\$ 68,674,163</b>	

# Public Utilities

## Revenue and Expense Statement (Non-General Fund)

Sewer Funds	FY201 Actual	FY2014* Budget	FY2015 Proposed
<b>BEGINNING BALANCE AND RESERVES</b>			
Balance from Prior Year	\$ 113,084,111	\$ 171,467,150	\$ 198,553,769
Continuing Appropriations - CIP	212,412,636	149,033,723	97,016,137
Dedicated Reserve (DRES)	28,681,368	27,021,285	—
Capital Reserve	5,000,000	5,000,000	5,000,000
Operating Reserve/Contingency	39,531,010	43,723,781	43,314,185
Rate Stabilization Reserve	21,300,000	21,300,000	21,300,000
Employee Efficiency Incentive Reserve	5,418,562	5,418,562	—
<b>TOTAL BALANCE AND RESERVES</b>	<b>\$ 425,427,687</b>	<b>\$ 422,964,501</b>	<b>\$ 365,184,091</b>
<b>REVENUE</b>			
Capacity Charges	\$ 14,041,093	\$ 9,000,000	\$ 11,000,000
Electrical Cogeneration	1,520,193	1,406,000	1,406,000
Grant Receipts	8,797	—	—
Interest Earnings	2,512,734	1,200,000	900,000
Land & Building Rentals	—	23,000	—
Other Revenue	6,751,142	328,844	297,400
Services Rendered to Others	7,273,970	8,795,000	8,758,000
Sewage Treatment Plant Services	67,311,542	65,000,000	65,000,000
Sewer Service Charges	288,843,627	289,709,000	289,788,000
State Revolving Fund Proceeds	19,462,817	33,694,000	38,481,700
<b>TOTAL REVENUE</b>	<b>\$ 407,725,915</b>	<b>\$ 409,155,844</b>	<b>\$ 415,631,100</b>
<b>TOTAL BALANCE, RESERVES, AND REVENUE</b>	<b>\$ 833,153,602</b>	<b>\$ 832,120,345</b>	<b>\$ 780,815,191</b>
<b>CAPITAL IMPROVEMENT PROGRAM (CIP) EXPENSE</b>			
CIP Expenditures	\$ 112,928,065	\$ 72,217,229	\$ 113,848,208
<b>TOTAL CIP EXPENSE</b>	<b>\$ 112,928,065</b>	<b>\$ 72,217,229</b>	<b>\$ 113,848,208</b>
<b>OPERATING EXPENSE</b>			
Debt Service	\$ 96,907,633	\$ 102,483,544	\$ 102,486,244
Department Expenditures	211,849,343	229,352,538	234,599,681
State Revolving Fund Loan Expense	6,030,624	7,533,412	10,372,900
<b>TOTAL OPERATING EXPENSE</b>	<b>\$ 314,787,600</b>	<b>\$ 339,369,494</b>	<b>\$ 347,458,825</b>
<b>EXPENDITURE OF PRIOR YEAR FUNDS</b>			
CIP Expenditures	\$ —	\$ 49,302,761	\$ —
<b>TOTAL EXPENDITURE OF PRIOR YEAR FUNDS</b>	<b>\$ —</b>	<b>\$ 49,302,761</b>	<b>\$ —</b>
<b>TOTAL EXPENSE</b>	<b>\$ 427,715,665</b>	<b>\$ 460,889,484</b>	<b>\$ 461,307,033</b>
<b>RESERVES</b>			
Continuing Appropriations - CIP	\$ 148,883,275	\$ 126,752,247	\$ 97,016,137
Dedicated Reserve (DRES)	27,043,918	—	—
Employee Efficiency Incentive Reserve	5,418,562	5,418,562	—
Capital Reserve	5,000,000	5,000,000	5,000,000

# Public Utilities

## Revenue and Expense Statement (Non-General Fund)

Sewer Funds	FY201 Actual	FY2014 <sup>*</sup> Budget	FY2015 Proposed
Operating Reserve/Contingency	43,723,781	43,314,185	44,320,487
Rate Stabilization Reserve	21,300,000	21,300,000	21,300,000
<b>TOTAL RESERVES</b>	<b>\$ 251,369,536</b>	<b>\$ 201,784,994</b>	<b>\$ 167,636,624</b>
<b>BALANCE</b>	<b>\$ 154,068,401</b>	<b>\$ 169,445,867</b>	<b>\$ 151,871,534</b>
<b>TOTAL BALANCE, RESERVES, AND EXPENSE</b>	<b>\$ 833,153,602</b>	<b>\$ 832,120,345</b>	<b>\$ 780,815,191</b>

<sup>\*</sup> At the time of publication, audited financial statements for Fiscal Year 2014 were not available. Therefore, the Fiscal Year 2014 column reflects final budget amounts from the Fiscal Year 2014 Adopted Budget. As such, current fiscal year balances and reserves are estimates of carryover from the previous fiscal year.

<sup>1</sup> Fiscal Year 2013 Actual amounts based on Supplemental Schedules prepared by the Office of the City Comptroller.

# Public Utilities

## Revenue and Expense Statement (Non-General Fund)

Water Utility Operating Fund	FY2013 Actual	FY2014* Budget	FY2015 Proposed
<b>BEGINNING BALANCE AND RESERVES</b>			
Balance from Prior Year	\$ 86,873,282	\$ 42,271,042	\$ 94,049,954
Continuing Appropriations - CIP	147,106,317	147,903,119	75,744,564
DRES	21,392,908	26,885,011	—
Capital Reserve	5,000,000	5,000,000	5,000,000
Operating Reserve/Contingency	29,556,542	29,492,988	30,662,165
Rate Stabilization Reserve	50,300,000	38,500,000	20,500,000
Secondary Purchase Reserve	12,503,886	12,314,908	12,544,476
Employee Efficiency Incentive Reserve	1,820,045	1,949,387	—
<b>TOTAL BALANCE AND RESERVES</b>	<b>\$ 354,552,980</b>	<b>\$ 304,316,455</b>	<b>\$ 238,501,159</b>
<b>REVENUE</b>			
Capacity Charges	\$ 11,704,419	\$ 8,152,000	\$ 10,000,000
Financing Proceeds	10,099,252	—	—
Grants Receipts	2,944,707	644,000	90,000
Interest Earnings	1,946,662	1,000,000	800,000
Land and Building Rentals	5,893,343	5,809,000	6,429,400
New Water Service	503,017	300,000	320,000
Other Revenue	6,717,218	4,013,269	586,000
Reclaimed Water	4,558,756	7,150,000	5,000,000
Sale of Water	394,184,356	385,900,000	438,813,400
Service Charges	1,146,820	1,216,000	1,216,000
Services Rendered to Others	6,875,364	6,236,000	6,376,000
State Revolving Fund Loan Proceeds	1,622,678	7,187,000	—
<b>TOTAL REVENUE</b>	<b>\$ 448,196,592</b>	<b>\$ 427,607,269</b>	<b>\$ 469,630,800</b>
<b>TOTAL BALANCE, RESERVES, AND REVENUE</b>	<b>\$ 802,749,572</b>	<b>\$ 731,923,724</b>	<b>\$ 708,131,959</b>
<b>CAPITAL IMPROVEMENT PROGRAM (CIP) EXPENSE</b>			
CIP Expenditures	\$ 73,601,040	\$ 46,596,937	\$ 99,801,601
<b>TOTAL CIP EXPENSE</b>	<b>\$ 73,601,040</b>	<b>\$ 46,596,937</b>	<b>\$ 99,801,601</b>
<b>OPERATING EXPENSE</b>			
Debt Service	\$ 58,650,380	\$ 62,119,556	\$ 62,123,844
Department Expenditures	138,858,169	163,381,287	168,048,157
State Revolving Fund Loan Expense	5,579,633	4,715,109	5,415,500
Water Purchases (Commodity)	183,742,490	184,682,097	201,284,386
Water Purchases (Fixed Charges)	24,173,495	24,392,497	25,075,154
<b>TOTAL OPERATING EXPENSE</b>	<b>\$ 411,004,167</b>	<b>\$ 439,290,546</b>	<b>\$ 461,947,041</b>
<b>EXPENDITURE OF PRIOR YEAR FUNDS</b>			
CIP Expenditures	\$ —	\$ 41,757,881	\$ —
<b>TOTAL EXPENDITURE OF PRIOR YEAR FUNDS</b>	<b>\$ —</b>	<b>\$ 41,757,881</b>	<b>\$ —</b>
<b>TOTAL EXPENSE</b>	<b>\$ 484,605,207</b>	<b>\$ 527,645,364</b>	<b>\$ 561,748,642</b>

# Public Utilities

## Revenue and Expense Statement (Non-General Fund)

Water Utility Operating Fund	FY2013 Actual	FY2014 <sup>*</sup> Budget	FY2015 Proposed
<b>RESERVES</b>			
Continuing Appropriation - CIP	\$ 147,312,722	\$ 133,030,249	\$ 75,744,564
Dedicated Reserve (DRES)	29,901,772	—	—
Employee Efficiency Incentive Reserve	1,949,387	1,949,387	—
Capital Reserve	5,000,000	5,000,000	5,000,000
Operating Reserve/Contingency	29,492,988	30,662,165	31,557,181
Rate Stabilization Reserve	38,500,000	20,500,000	20,500,000
Secondary Purchase Reserve	12,314,908	12,544,476	13,581,572
<b>TOTAL RESERVES</b>	<b>\$ 264,471,777</b>	<b>\$ 203,686,277</b>	<b>\$ 146,383,317</b>
<b>BALANCE</b>	<b>\$ 53,672,588</b>	<b>\$ 592,083</b>	<b>\$ —</b>
<b>TOTAL BALANCE, RESERVES, AND EXPENSE</b>	<b>\$ 802,749,572</b>	<b>\$ 731,923,724</b>	<b>\$ 708,131,959</b>

\* At the time of publication, audited financial statements for Fiscal Year 2014 were not available. Therefore, the Fiscal Year 2014 column reflects final budget amounts from the Fiscal Year 2014 Adopted Budget. As such, current fiscal year balances and reserves are estimates of carryover from the previous fiscal year.

<sup>1</sup>Fiscal Year 2013 Actual amounts based on Supplemental Schedules prepared by the Office of the City Comptroller.



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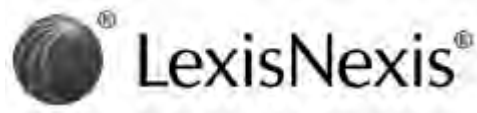
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As of: Dec 24, 2014

**SAVE TARA, Plaintiff and Appellant, v. CITY OF WEST HOLLYWOOD, Defendant and Respondent; WASET, INC., et al., Real Parties in Interest and Respondents.**

S151402

## SUPREME COURT OF CALIFORNIA

**45 Cal. 4th 116; 194 P.3d 344; 84 Cal. Rptr. 3d 614; 2008 Cal. LEXIS 12737; 39 ELR 20272**

October 30, 2008, Filed

**SUBSEQUENT HISTORY:** Reported at *Save Tara v. City of West Hollywood*/(*Waset, Inc.*), 2008 Cal. LEXIS 13793 (Cal., Oct. 30, 2008)

Later proceeding at *Save Tara v. City of West Hollywood* (*Waset, Inc.*), 2008 Cal. LEXIS 13555 (Cal., Nov. 20, 2008)

Modified by *Save Tara v. City of West Hollywood*, 2008 Cal. LEXIS 13770 (Cal., Dec. 10, 2008)

Request denied by, Modified by *Save Tara v. City of West Hollywood* (*Waset, Inc.*), 2008 Cal. LEXIS 14960 (Cal., Dec. 10, 2008)

Modification order at *Save Tara v. City of West Hollywood* (*Waset, Inc.*), 2008 Cal. LEXIS 14977 (Cal., Dec. 10, 2008)

**PRIOR-HISTORY:**

Court of Appeal Second Appellate District, Division Eight, No. B185656. Superior Court of Los Angeles County, No. BS090402, Ernest M. Hiroshige, Judge. *Save Tara v. City of West Hollywood*, 147 Cal. App. 4th 1091, 54 Cal. Rptr. 3d 856, 2007 Cal. App. LEXIS 221 (Cal. App. 2d Dist., 2007)

**HEADNOTES-1**

CALIFORNIA OFFICIAL REPORTS HEADNOTES

**(10) Pollution and Conservation Laws § 2--California Environmental Quality Act--Impact Reports--Timing--Compliance Condition in Agreement.**--Under *Pub. Resources Code*, §§ 21100, 21151, a city improperly committed itself to a definite course of action regarding a development of low-income senior housing before fully evaluating the environmental effects, as demonstrated by the city's public announcements that it was determined to proceed with the project at a specified location; its actions in accordance with that determination by preparing to relocate tenants from the property; its substantial financial contribution to the project; and its willingness to bind itself by a draft agreement to convey the property if the developer satisfied environmental requirements, as reasonably determined by the city manager.

[*Manaster & Selmi, Cal. Environmental Law & Land Use Practice* (2008) ch. 21, § 21.03; *Cal. Forms of Pleading and Practice* (2008) ch. 418, *Pollution and Environmental Matters*, § 418.36; 12 Witkin, Summary of Cal. Law (10th ed. 2005) Real Property, § 832.]

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Latham & Watkins, James L. Arnone, Stephanie E. Ord, Ernest J. Hahn and Benjamin J. Hanelin for Real Parties in Interest and Respondents.

**JUDGES:** Opinion by Werdegarr, J., expressing the unanimous opinion of the court.

**OPINION BY:** Werdegarr

## OPINION

**WERDEGAR, J.**--Under the California Environmental Quality Act (CEQA) (*Pub. Resources Code*, § 21000 *et seq.*),<sup>1</sup> a public agency must prepare an environmental impact report (EIR) on any project the agency proposes to "carry out or approve" if that project may have significant environmental effects (§§ 21100, *subd. (a)*, 21151, *subd. (a)*). We address in this case the question whether and under what circumstances an agency's agreement allowing private development, conditioned on future compliance with CEQA, constitutes approval of the project within the meaning of sections 21100 and 21151. We conclude that under some circumstances such

an agreement does amount to approval and must be preceded by preparation of an EIR. Under the circumstances of this case, we further conclude the City of West Hollywood's conditional agreement to sell land for private development, coupled with financial support, public statements, and other actions by its officials committing the city to the development, was, for CEQA purposes, an approval of the project that was required under sections 21100 and 21151 to have been preceded by preparation of an EIR.

1 All further unspecified statutory references are to the Public Resources Code.

## FACTUAL AND PROCEDURAL BACKGROUND

The property at 1343 North Laurel Avenue (1343 Laurel) in the City of West Hollywood (City) is occupied by a large colonial-revival-style house constructed in 1923, later converted to four apartments, and a chauffeur's house and garage. The buildings are set well back from the street, and the property is heavily wooded and landscaped, in contrast to most other properties on the block. City designated the main house a local cultural resource in 1994. In 1997, Mrs. Elsie Weisman, the longtime owner of 1343 Laurel, donated it to City on condition she be permitted to live there until her death and the other tenants be permitted to occupy the premises for six months after her death. Mrs. Weisman died in 2000 at the age of 101.<sup>2</sup>

2 Whether because of its estate-like appearance or because *Gone With the Wind* (Metro-Goldwyn-Mayer 1939) was Mrs. Weisman's favorite film, 1343 Laurel has acquired the popular nickname "Tara."

Two nonprofit community housing developers, West Hollywood Community Housing Corporation and WASET, Inc., and a corporation they created for the purpose, Laurel Place West Hollywood, Inc. (collectively, Laurel Place), propose to develop approximately 35 housing units for low-income seniors on the 1343 Laurel site. As outlined in a 2003 grant application to the United States Department of Housing and Urban Development (HUD), the project would preserve the main house but not the chauffeur's house or garage. The existing two-story house would be converted to hold the manager's apartment, one resident's apartment, and communal space, including a multipurpose room, arts and crafts room, television lounge and kitchen. A new three-story building, wrapping around the existing house's back and sides, would contain 33 one-bedroom apartments and underground parking spaces for residents. Between the back of the existing house and the new building would be a landscaped courtyard. A

2,800-square-foot portion of the existing front yard would remain in City's hands and be used as a pocket park. The HUD application included preliminary architectural drawings showing the proposed renovation, new building, site plan and landscaping.

On June 9, 2003, to facilitate Laurel Place's HUD grant application, City's city council granted Laurel Place an option to purchase the 1343 Laurel property, allowing the developer to show HUD it had control of the project site. In a June 10 letter to a HUD official, City's city manager outlined City's intended contribution to the proposed project: "To make the project competitive, [City] has approved the sale of the property at negligible cost." More specifically, City planned to contribute \$ 1.5 million in land value. "In addition, [City] will commit additional funding, in an amount not to exceed \$ 1 million," toward development costs. "In summary, [City] will be contributing land and funds totaling \$ 2,500,000 toward the development of the Laurel Place project."

HUD approved a \$ 4.2 million grant to Laurel Place in late 2003. City's mayor announced the grant in a December 2003 e-mail to residents, explaining it "will be used to build 35 affordable senior residential units, rehabilitate an historic house, and provide a public pocket park on Laurel Avenue." He described the project as "a win-win-win for the City, balancing desperately needed affordable senior housing with historic preservation and open space." Similarly, a City newsletter announced that with the recent HUD grant, City and Laurel Place "will redevelop the property" to rehabilitate the main house, build 35 units of low-income senior housing, and create a pocket park. The mayor's announcement referred residents with questions about the proposed development to Jeffrey Skornick, City's housing manager.

Shortly after the HUD grant was approved, in November 2003, Skornick wrote to a 1343 Laurel tenant, Allegra Allison, reassuring her that "nothing is going to happen for about a year" and that "[a]s the project proceeds and prior to construction" the tenants would receive professional relocation assistance. While he knew she would prefer to stay at 1343 Laurel, the housing manager wrote, he pledged, on City's behalf, to "do everything in our power to minimize the impact of this project on you." In December 2003, Allison responded that "your relocation people" had already contacted tenants and, according to one tenant, had said they would soon be served with "one year eviction notices."

In January 2004, Skornick, responding to a resident critical of the proposed development, explained that the project would retain the historic house and most of the property's front yard, as the new building would be to the rear of the site. He continued: "We are happy to consider variations on the approach. However, inasmuch as the

City and its development partners have been awarded a \$ 4.2 million federal grant to help develop this project for senior housing, we must continue on a path that fulfills this obligation." In another January 2004 e-mail to a resident, a city council member's deputy used the same language, referring to the development of senior housing on the site as an "obligation" City "must" pursue.

On April 23, 2004, City announced the city council would consider, at its May 3 meeting, an agreement to facilitate development of the 1343 Laurel project, "subject to environmental review" and other regulatory approvals. Save Tara, an organization of City residents and neighbors opposed to the project, wrote City to urge that it conduct CEQA review, including an EIR, *before* approving any new agreement, making a loan, or renewing the purchase option. Despite that and numerous other objections voiced at the meeting (many also expressed support), the city council on May 3, 2004, voted to (1) approve a "Conditional Agreement for Conveyance and Development of Property" between City and Laurel Place, including a \$ 1 million City loan to the developer, in order to "facilitate development of the project and begin[] the process of working with tenants to explore relocation options"; (2) authorize the city manager to execute the agreement "substantially in the form attached"; and (3) have appropriate City commissions review "alternative configurations" for the planned new building and obtain more public input "on the design of project elements."

The "Conditional Agreement for Conveyance and Development of Property" the city council thus approved and authorized the city manager to execute (the May 3 draft agreement) had the stated purpose of "caus[ing] the reuse and redevelopment of [1343 Laurel] with affordable housing for seniors and a neighborhood pocket park, while retaining the historic integrity of the Site." The agreement provided that "upon satisfaction of the conditions of this Agreement," City would convey the property to Laurel Place and provide the developer a loan, and Laurel Place would construct 35 units of housing, one for the resident manager and 34 restricted to occupancy by low-income seniors. In the first phase of actions under the agreement, Laurel Place would obtain final HUD approval, "complete the relocation of tenants"<sup>3</sup> and take actions necessary "to comply with CEQA ... ." Once the property was conveyed, the second, construction phase would begin.

3 A staff report on the proposed agreement, presented to the city council, explained that relocation notices would be sent "shortly after" the agreement was executed, starting a one-year period for relocating the tenants.

Under the May 3 draft agreement, City's obligation to convey the property and make the improvement portion of the loan (i.e., all of the \$ 1 million loan other than the predevelopment portion and an earlier grant for \$ 20,000) was subject to several conditions precedent, among them that "[a]ll applicable requirements of CEQA ... have been satisfied, as reasonably determined by the City Manager" and that "[d]eveloper shall have obtained all Entitlements." <sup>4</sup> The city manager, however, could waive these conditions. The predevelopment portion of the loan, which City estimated at \$ 475,000, was to be used for, inter alia, "environmental reports" and "governmental permits and fees" and was not subject to the CEQA compliance or entitlement conditions.

4 The May 3 draft agreement defined "Entitlements" to include zoning changes, general plan amendments, and CEQA compliance, as well as any other permit or license required by City.

A "Scope of Development" discussion attached to the May 3 draft agreement explained that "[a] three- or four-story building over semi-subterranean parking will be erected at the west-rear portion of the lot, replacing what are currently the garage and outdoor parking area, and possibly the chauffeur's quarters." The new building's exterior and interior design were described in some detail.

At the city council's May 3, 2004, meeting, the project architect explained that the exact building design had not yet been determined and that historic preservation values would be fully considered in the final design. For example, the chauffeur's house could be preserved, while still adding 35 housing units, by making the new building four stories rather than three, though the architect for aesthetic reasons preferred a three-story building.

Skornick, City's housing manager, similarly told the council that the further planning processes the project would undergo were "not a rubber stamp," as there were "real options to consider" regarding the design of the new building and park. At the same time, Skornick noted that staff had already rejected the alternative uses of 1343 Laurel suggested in public comments, such as dedication of the entire property for a park or use of the historic home as a library or cultural center. These alternatives, Skornick explained, failed to contribute to City's affordable housing goals and, in any event, "there were no funds available for those options." Finally, Skornick stressed that "while the agreement is conditional, the council needs to know that the recommended actions will commit the city as long as the developer delivers."

On July 12, 2004, Save Tara filed the operative complaint and petition for writ of mandate alleging, inter alia, that City had violated CEQA by failing to prepare

an EIR before the city council's May 3 approval of the loan and draft agreement. On August 9, 2004, City and Laurel Place executed a revised agreement (the August 9 executed agreement). <sup>5</sup> This agreement followed the May 3 draft agreement in many respects, but contained some potentially significant changes. The requirement that all applicable CEQA requirements be satisfied could no longer be waived by the city manager, and the parties expressly recognized City retained "complete discretion over ... any actions necessary to comply with CEQA" and that the agreement "imposes no duty on City to approve ... any documents prepared pursuant to CEQA." Finally, details on tenant relocation were stated, including that the developer was to begin the process by hiring a relocation consultant within 30 days.

5 Save Tara argues the administrative record should not have been augmented with the August 9 executed agreement, as its execution took place *after* the decision Save Tara has challenged, i.e., the city council's approval of the May 3 draft agreement. We agree with the Court of Appeal, however, that "[w]hile the May 2004 agreement is relevant for certain purposes, review of City's decision would be ineffective, if it were limited to the May 2004 Agreement, which is no longer operative." Like the lower court, we treat Save Tara's petition for writ of mandate as amended to address the August 9 executed agreement as well as the May 3 draft agreement.

The superior court denied Save Tara's mandate petition, finding that while the parties agreed the 1343 Laurel project did call for an EIR at some time, none was required before approving the May 3 draft agreement because "the Agreement is expressly conditioned on compliance with CEQA ... [and] does not limit the project alternatives or possible mitigation measures." Thus, City "has not given its final approval to convey the property at issue to [Laurel Place], nor has it given its final approval of the housing project itself."

The Court of Appeal reversed. *Section 21100*, the appellate court reasoned, requires an EIR be prepared whenever lead agencies "propose to approve or carry out" a project with potential significant effects; it is not, contrary to the trial court's holding, "to be delayed until a 'final' decision has been made." Moreover, conditioning a development agreement on CEQA compliance is insufficient because the EIR review process "is intended to be part of the decisionmaking process itself, and not an examination, *after the decision has been made*, of the possible environmental consequences of the decision." Any question as to whether a particular point in the development process is too early for preparation of an EIR "is resolved by the pragmatic inquiry whether there is

enough information about the project to permit a meaningful environmental assessment. If the answer is yes, the EIR review process must be initiated." Before May 3, 2004, the Court of Appeal held, the project was well enough defined to permit meaningful environmental analysis, which City should have performed between the award of the HUD grant in November 2003 and the approval of the May 3 draft agreement.

As remedy for the CEQA violation, the Court of Appeal remanded with directions that City be ordered (1) to void its approval of the May 3 and August 9 agreements, and (2) to "engage in the EIR review process (a) based on the project as described in the HUD application and (b) without reference to the May and August 2004 Agreements." One justice dissented, arguing the matter was moot because, according to the parties, City had certified a final EIR for the project in October 2006.

We granted City's and Laurel Place's petitions for review, which presented the mootness issue as well as the substantive question of whether an EIR was required before City's approval of the conditional development agreement.

## DISCUSSION

### I. Mootness

According to the Court of Appeal decision, City approved a final EIR for the 1343 Laurel project in October 2006, during pendency of the appeal. All parties agree on this chronology and further agree that Save Tara has not challenged the adequacy of this EIR in court.

The parties dispute whether these events rendered the present appeal moot. City and Laurel Place take the position that Save Tara has already received the relief it seeks in this action--preparation and certification of an EIR--and no further effective relief can be granted it. They cite CEQA cases in which, during pendency of the litigation, the project site had undergone irreversible physical or legal changes. (See, e.g., *Environmental Coalition of Orange County, Inc. v. Local Agency Formation Com.* (1980) 110 Cal.App.3d 164, 171-173 [167 Cal. Rptr. 735] [challenge to EIR for annexation moot where annexation had already occurred and could not be ordered annulled because annexing city was not a party to the action]; *Hixon v. County of Los Angeles* (1974) 38 Cal.App.3d 370, 378 [113 Cal. Rptr. 433] [street improvement project involving tree replacement had already progressed to removal of original trees, which could not be restored].) Save Tara, in turn, argues that effective relief, in the form of an order setting aside City's approval of the May 3 draft agreement and August 9 executed agreement, can still be awarded, as it was by the Court of Appeal. It cites CEQA cases that were held

not to be moot despite some intervening progress on the project. (See, e.g., *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1202-1204 [22 Cal. Rptr. 3d 203] [partial construction of a project did not moot the appeal, as the project could still be modified, reduced, or mitigated]; *Woodward Park Homeowners Assn. v. Garreks, Inc.* (2000) 77 Cal.App.4th 880, 888 [92 Cal. Rptr. 2d 268] [already constructed project could be modified or removed].)

We agree with Save Tara that the preparation and certification of an EIR does not render the appeal moot. No irreversible physical or legal change has occurred during pendency of the action, and Save Tara can still be awarded the relief it seeks, an order that City set aside its approvals. As will appear, we ultimately conclude the matter must be remanded with directions that the superior court order City to void its approval of the May 3 and August 9 agreements and reconsider those decisions, informed this time by an EIR of the full environmental consequences. Neither City nor Laurel Place contends such reconsideration is impossible as a practical matter or that the superior court lacks the power to order it. Such an order remedies the CEQA violation Save Tara alleges occurred, approval of the agreements without prior preparation and consideration of an EIR, and thus constitutes effective relief.

### II. Timing of EIR Preparation

We turn to the substantive CEQA issue presented: Was City required to prepare and consider an EIR before approving the conveyance and development agreement on May 3 and executing the revised agreement on August 9, 2004? To answer this question, we first outline, in this part of the opinion, the existing law on timing of EIR preparation and the legislative policies that shape this law. We next address, in part III., the general question of whether an agency may delay EIR preparation by making its final approval of a project contingent on subsequent CEQA compliance, while otherwise agreeing to go forward with the project. In part IV., we apply our conclusions to the facts of this case to determine that City's May 3 and August 9 actions constituted project approval requiring prior preparation of an EIR.

We begin with CEQA's text. *Section 21100, subdivision (a)* provides in pertinent part: "All lead agencies shall prepare, or cause to be prepared by contract, and certify the completion of, an environmental impact report on any project which they *propose to carry out or approve* that may have a significant effect on the environment." (Italics added.) To the same effect, *section 21151* provides that "local agencies shall prepare, or cause to be prepared by contract, and certify the completion of, an environmental impact report on any project that they



*intend to carry out or approve* which may have a significant effect on the environment." (Italics added.)<sup>6</sup>

6 Both sections appear applicable to City. *Section 21151* applies to local governments by its terms. *Section 21100*, although placed in a chapter of CEQA mainly addressing the duties of state agencies, itself applies to all "lead agencies," a term that includes local public entities undertaking projects subject to CEQA. (See §§ 21067 ["Lead agency" means the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment.], 21063 ["Public agency" includes any state agency, board, or commission, any county, city and county, city, regional agency, public district, redevelopment agency, or other political subdivision.].)

While the statutes do not specify criteria for determining when an agency "approve[s]" a project, the law's implementing regulations, the CEQA Guidelines (*Cal. Code Regs., tit. 14, § 15000 et seq.*),<sup>7</sup> do address the question. *Section 15352 of the CEQA Guidelines* provides as follows:

7 "The CEQA Guidelines, promulgated by the state's Resources Agency, are authorized by *Public Resources Code section 21083*. In interpreting CEQA, we accord the Guidelines great weight except where they are clearly unauthorized or erroneous." (*Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal.4th 412, 428, fn. 5 [53 Cal. Rptr. 3d 821, 150 P.3d 709].)

"(a) 'Approval' means the decision by a public agency which commits the agency to a definite course of action in regard to a project intended to be carried out by any person. The exact date of approval of any project is a matter determined by each public agency according to its rules, regulations, and ordinances. Legislative action in regard to a project often constitutes approval.

"(b) With private projects, approval occurs upon the earliest commitment to issue or the issuance by the public agency of a discretionary contract, grant, subsidy, loan, or other form of financial assistance, lease, permit, license, certificate, or other entitlement for use of the project." (*Cal. Code Regs., tit. 14, § 15352, subds. (a), (b).*)

*CEQA Guidelines section 15004, subdivision (b)* observes that "[c]hoosing the precise time for CEQA compliance involves a balancing of competing factors. EIRs and negative declarations should be prepared as early as feasible in the planning process to enable envi-

ronmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment." (*Cal. Code Regs., tit. 14, § 15004, subd. (b).*)<sup>8</sup>

8 The parties' briefs frame the timing issue here in two ways: (1) Did City, in May and August of 2004, *approve* the 1343 Laurel project and (2) was the contingent agreement to convey and develop 1343 Laurel itself a *project*? While this opinion will discuss some relevant decisions on the definition of a project, it largely follows the first formulation, asking whether City approved the project. As *section 15378 of the CEQA Guidelines* explains: "(a) 'Project' means the whole of an action, which has a potential for resulting in [an environmental change.] [¶] ... [¶] (c) The term 'project' refers to the activity which is being approved and which may be subject to several discretionary approvals by governmental agencies. The term 'project' does not mean each separate governmental approval." (*Cal. Code Regs., tit. 14, § 15378.*) The "project" in this case is the redevelopment of 1343 Laurel, not any of the individual steps City took to approve it. City and Laurel Place do not dispute the redevelopment of 1343 Laurel is a project requiring evaluation in an EIR; they disagree with Save Tara only on the required timing of that EIR process.

This court has on several occasions addressed the timing of environmental review under CEQA, emphasizing in each case the same policy balance outlined in *CEQA Guidelines section 15004, subdivision (b)*. In *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68 [118 Cal. Rptr. 34, 529 P.2d 66] (*No Oil, Inc.*), discussing whether the proper scope of an EIR included possible related future actions, we quoted this observation from a federal decision: "Statements must be written late enough in the development process to contain meaningful information, but they must be written early enough so that whatever information is contained can practically serve as an input into the decision making process." (*Id. at p. 77, fn. 5.*) We again quoted this formulation of the general issue in *Fullerton Joint Union High School Dist. v. State Bd. of Education* (1982) 32 Cal.3d 779 [187 Cal. Rptr. 398, 654 P.2d 168] (*Fullerton*), which considered whether a particular action was a "project" for CEQA purposes, adding, with what has turned out to be an understatement, that "[t]he timing of an environmental study can present a delicate problem." (*Fullerton, at p. 797.*)

In *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376 [253 Cal. Rptr. 426, 764 P.2d 278] (commonly known as *Laurel*

*Heights I*), again discussing the proper scope of an EIR regarding future actions, we summed up the issue and attempted to state a rule, as follows: "We agree that environmental resources and the public fisc may be ill served if the environmental review is too early. On the other hand, the later the environmental review process begins, the more bureaucratic and financial momentum there is behind a proposed project, thus providing a strong incentive to ignore environmental concerns that could be dealt with more easily at an early stage of the project. ... For that reason, "EIRs should be prepared as early in the planning process as possible to enable environmental considerations to influence project, program or design." (Id. at p. 395.)<sup>9</sup> We also observed that at a minimum an EIR must be performed before a project is approved, for "[i]f postapproval environmental review were allowed, EIR's would likely become nothing more than *post hoc* rationalizations to support action already taken." (*Laurel Heights I*, at p. 394.)

9 In the recent decision of *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova*, *supra*, 40 Cal.4th at page 441, discussing the extent to which a large housing project's EIR was required to address water sources for the project's later phases, we reiterated *Laurel Heights I*'s admonition that environmental analysis not be delayed to the point where "bureaucratic and financial momentum" rendered it practically moot.

This court, like the CEQA Guidelines, has thus recognized two considerations of legislative policy important to the timing of mandated EIR preparation: (1) that CEQA not be interpreted to require an EIR before the project is well enough defined to allow for meaningful environmental evaluation; and (2) that CEQA not be interpreted as allowing an EIR to be delayed beyond the time when it can, as a practical matter, serve its intended function of informing and guiding decision makers.

The CEQA Guidelines define "approval" as "the decision by a public agency which commits the agency to a definite course of action in regard to a project." (*Cal. Code Regs.*, tit. 14, § 15352, *subd. (a)*.) The problem is to determine when an agency's favoring of and assistance to a project ripens into a "commit[ment]." To be consistent with CEQA's purposes, the line must be drawn neither so early that the burden of environmental review impedes the exploration and formulation of potentially meritorious projects, nor so late that such review loses its power to influence key public decisions about those projects.

Drawing this line raises predominantly a legal question, which we answer independently from the agency whose decision is under review. While judicial review of

CEQA decisions extends only to whether there was a prejudicial abuse of discretion, "an agency may abuse its discretion under CEQA either by failing to proceed in the manner CEQA provides or by reaching factual conclusions unsupported by substantial evidence. (§ 21168.5.) Judicial review of these two types of error differs significantly: While we determine *de novo* whether the agency has employed the correct procedures, 'scrupulously enforc[ing] all legislatively mandated CEQA requirements' (*Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564 [276 Cal. Rptr. 410, 801 P.2d 1161]), we accord greater deference to the agency's substantive factual conclusions." (*Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova*, *supra*, 40 Cal.4th at p. 435.)

A claim, like *Save Tara*'s here, that the lead agency approved a project with potentially significant environment effects *before* preparing and considering an EIR for the project "is predominantly one of improper procedure" (*Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova*, *supra*, 40 Cal.4th at p. 435) to be decided by the courts independently. The claim goes not to the validity of the agency's factual conclusions but to the required timing of its actions. Moreover, as noted above (fn. 8, *ante*), the timing question may also be framed by asking whether a particular agency action is in fact a "project" for CEQA purposes, and that question, we have held, is one of law. (*Muzzy Ranch Co. v. Solano County Airport Land Use Com.* (2007) 41 Cal.4th 372, 382 [60 Cal. Rptr. 3d 247, 160 P.3d 116]; *Fullerton*, *supra*, 32 Cal.3d at p. 795.)<sup>10</sup>

10 In *Mount Sutro Defense Committee v. Regents of University of California* (1978) 77 Cal.App.3d 20, 40 [143 Cal. Rptr. 365], the Court of Appeal remarked that "the determination of the earliest feasible time [for environmental review] is to be made initially by the agency itself, which decision must be respected in the absence of manifest abuse." (Accord, *Stand Tall on Principles v. Shasta Union High Sch. Dist.* (1991) 235 Cal.App.3d 772, 780 [1 Cal. Rptr. 2d 107]; see also *City of Vernon v. Board of Harbor Comrs.* (1998) 63 Cal.App.4th 677, 690 [74 Cal. Rptr. 2d 497] ["the timing of an EIR is committed to the discretion and judgment of the agency ..."].) To the extent these opinions contradict our determination that postponement of an EIR until after project approval constitutes procedural error that is independently reviewable, we disapprove them.

Considering the timing issue as one of legally proper procedure does not remove all logistical discretion from agencies; it merely sets an outer limit to how long EIR

preparation may be delayed. To accord overly deferential review of agencies' timing decisions could allow agencies to evade CEQA's central commands. While an agency may certainly adjust its rules so as to set "[t]he exact date of approval" (*Cal. Code Regs., tit. 14, § 15352, subd. (a)*), an agency has no discretion to define approval so as to make its commitment to a project precede the required preparation of an EIR.

### III. *Development Agreements Contingent on CEQA Compliance*

The May 3 draft agreement and August 9 executed agreement conditioned City's obligation to convey the property to Laurel Place for development on all applicable requirements of CEQA having been satisfied. City and Laurel Place contend such a CEQA compliance condition on an agreement to convey or develop property eliminates the need for preparation of an EIR (or any other CEQA document) before an agency approves the agreement. In contrast, Save Tara, quoting the Court of Appeal, maintains that permitting a CEQA compliance condition to postpone environmental review until after an agreement on the project has been reached would render the EIR requirement a "dead letter." We adopt an intermediate position: A CEQA compliance condition can be a legitimate ingredient in a preliminary public-private agreement for exploration of a proposed project, but if the agreement, viewed in light of all the surrounding circumstances, commits the public agency as a practical matter to the project, the simple insertion of a CEQA compliance condition will not save the agreement from being considered an approval requiring prior environmental review.

As previously noted, the CEQA Guideline defining "approval" states that "[w]ith private projects, approval occurs upon the earliest commitment to issue or the issuance by the public agency of a discretionary contract, grant, subsidy, loan, or other form of financial assistance, lease, permit, license, certificate, or other entitlement for use of the project." (*Cal. Code Regs., tit. 14, § 15352, subd. (b)*.)<sup>11</sup> On its face, this regulatory definition suggests a public agency's execution of a contract to convey a property for development would constitute approval of the development project. City and Laurel Place rely on two decisions holding agreements not to be approvals for CEQA purposes when conditioned on later CEQA compliance.

<sup>11</sup> The guideline derives in part from *Public Resources Code section 21065*, which defines "project" as including a private activity supported by public contracts, grants, or other assistance, or requiring issuance of a public permit, license, or other entitlement. (*Id., subs. (b), (c)*.)

In *Stand Tall on Principles v. Shasta Union High Sch. Dist.*, *supra*, 235 Cal.App.3d 772 (*Stand Tall*), a school district board passed resolutions choosing the site for a new high school from a group of finalists and authorizing the district administration to purchase the property; any offer to purchase "was to be made contingent upon completion of the EIR process and final state approval." (*Id. at p. 777*.) The appellate court rejected a claim the EIR should have been done before selecting the preferred school site, reasoning that "the Board's resolutions regarding the site selection do not constitute an 'approval' under CEQA because they do not commit the District to a definite course of action since they are expressly made contingent on CEQA compliance." (*Id. at p. 781*, italics omitted.)

In *Concerned McCloud Citizens v. McCloud Community Services Dist.* (2007) 147 Cal.App.4th 181 [54 Cal. Rptr. 3d 1] (*McCloud*), a district executed an agreement with a commercial spring water bottler for exclusive rights to bottle and sell water from the district's sources, contingent on, among other things, the district and the bottler "completing, during the Contingency Period, proceedings under CEQA in connection with the Project, and the expiration of the applicable period for any challenge to the adequacy of District's and [the bottler's] compliance with CEQA without any challenge being filed." (*Id. at p. 188*.) Relying in part on *Stand Tall*, the *McCloud* court held no EIR was required before the district executed the contingent bottling agreement. The agreement was subject to several "ifs," the court reasoned, continuing: "The biggest 'if' in the agreement however is *if* all discretionary permits, expressly defined as including CEQA documentation, review and approvals, along with the final adjudication of any legal challenges based on CEQA, are secured and all environmental, title, physical, water quality and economic aspects of the project are assessed." (*McCloud, at p. 193*.)

Without questioning the correctness of *Stand Tall* and *McCloud* on their facts, we note that each case involved particular circumstances limiting the reach of its logic; neither convinces us a broad rule exists permitting EIR preparation to be postponed in all circumstances by use of a CEQA compliance condition.

In *McCloud*, the court relied in part on the agreement's lack of information as to the springs that would be exploited, the site of the bottling plant, how the water would be transported, and other details essential to environmental analysis of the project. Without that information, the court concluded, "preparation of an EIR would be premature. Any analysis of potential environmental impacts would be wholly speculative and essentially meaningless." (*McCloud, supra*, 147 Cal.App.4th at p. 197.) In the terms used by the CEQA Guidelines to define "approval"--"the decision by a public agency

which commits the agency to a definite course of action" (*Cal. Code Regs., tit. 14, § 15352, subd. (a)*)--McCloud thus speaks as much to *definiteness* as to commitment and does not establish that a conditional agreement for development never constitutes approval of the development.

*Stand Tall, supra*, 235 Cal.App.3d 772, involved an agreement to purchase property, an activity that, as a practical matter in a competitive real estate market, may sometimes need to be initiated before completing CEQA analysis. The CEQA Guidelines accommodate this need by making an exception to the rule that agencies may not "make a decision to proceed with the use of a site for facilities which would require CEQA review" before conducting such review; the exception provides that "agencies may designate a preferred site for CEQA review and may enter into land acquisition agreements when the agency has conditioned the agency's future use of the site on CEQA compliance." (*Cal. Code Regs., tit. 14, § 15004, subd. (b)(2)(A)*.) The Guidelines' exception for land purchases is a reasonable interpretation of CEQA, but it should not swallow the general rule (reflected in the same regulation) that a development decision having potentially significant environmental effects must be *preceded*, not *followed*, by CEQA review. (See *Laurel Heights I, supra*, 47 Cal.3d at p. 394 ["A fundamental purpose of an EIR is to provide decision makers with information they can use in deciding *whether* to approve a proposed project, not to inform them of the environmental effects of projects that they have already approved."].)

City and Laurel Place apparently would limit the "commit[ment]" that constitutes approval of a private project for CEQA purposes (*Cal. Code Regs., tit. 14, § 15352, subd. (a)*) to unconditional agreements irrevocably vesting development rights. In their view, "[t]he agency commits to a definite course of action ... by agreeing to be legally bound to take that course of action." (*City of Vernon v. Board of Harbor Comrs., supra*, 63 Cal.App.4th at p. 688.) On this theory, any development agreement, no matter how definite and detailed, even if accompanied by substantial financial assistance from the agency and other strong indications of agency commitment to the project, falls short of approval so long as it leaves final CEQA decisions to the agency's future discretion.

Such a rule would be inconsistent with the CEQA Guidelines' definition of approval as the agency's "*earliest* commitment" to the project. (*Cal. Code Regs., tit. 14, § 15352, subd. (b)*, italics added.) Just as CEQA itself requires environmental review before a project's approval, not necessarily its *final* approval (*Pub. Resources Code, §§ 21100, 21151*), so the guideline defines "approval" as occurring when the agency *first* exercises its

discretion to execute a contract or grant financial assistance, not when the *last* such discretionary decision is made.

Our own decisions are to the same effect: we have held an agency approved a project even though further discretionary governmental decisions would be needed before any environmental change could occur. (See *Muzzy Ranch Co. v. Solano County Airport Land Use Com., supra*, 41 Cal.4th at p. 383 [adoption of airport land use plan held to be a project even though it directly authorized no new development]; *Fullerton, supra*, 32 Cal.3d at p. 795 [adoption of school district succession plan held to be a project even though "further decisions must be made before schools are actually constructed ..."]; *Bozung v. Local Agency Formation Com. (1975) 13 Cal.3d 263, 279, 282* [118 Cal. Rptr. 249, 529 P.2d 1017] [regional agency's approval of annexation by city held to be a project even though further approvals, including zoning changes, would be needed for property development to occur].) Though these decisions framed the question as whether certain agency steps constituted projects, rather than whether the agency had approved a project, they stand for the principle that CEQA review may not always be postponed until the last governmental step is taken.

Moreover, limiting approval to unconditional agreements that irrevocably vest development rights would ignore what we have previously recognized, that postponing environmental analysis can permit "bureaucratic and financial momentum" to build irresistibly behind a proposed project, "thus providing a strong incentive to ignore environmental concerns." (*Laurel Heights I, supra*, 47 Cal.3d at p. 395.)

A public entity that, in theory, retains legal discretion to reject a proposed project may, by executing a detailed and definite agreement with the private developer and by lending its political and financial assistance to the project, have as a practical matter committed itself to the project. When an agency has not only expressed its inclination to favor a project, but has increased the political stakes by publicly defending it over objections, putting its official weight behind it, devoting substantial public resources to it, and announcing a detailed agreement to go forward with the project, the agency will not be easily deterred from taking whatever steps remain toward the project's final approval.

For similar reasons, we have emphasized the practical over the formal in deciding whether CEQA review can be postponed, insisting it be done early enough to serve, realistically, as a meaningful contribution to public decisions. (See *Fullerton, supra*, 32 Cal.3d at p. 797 ["as a practical matter," school district succession plan was a project requiring review]; *No Oil, Inc., supra*, 13 Cal.3d

at p. 77, fn. 5 ["Statements must be written ... early enough so that whatever information is contained can practically serve as an input into the decision making process."]; see also *Citizens for Responsible Government v. City of Albany* (1997) 56 Cal.App.4th 1199, 1221 [66 Cal. Rptr. 2d 102] [CEQA review should not be delayed to the point where it would "call for a burdensome reconsideration of decisions already made"].) The full consideration of environmental effects CEQA mandates must not be reduced "to a process whose result will be largely to generate paper, to produce an EIR that describes a journey whose destination is already predetermined." (*Natural Resources Defense Council, Inc. v. City of Los Angeles* (2002) 103 Cal.App.4th 268, 271 [126 Cal. Rptr. 2d 615].)

We note as well that postponing EIR preparation until after a binding agreement for development has been reached would tend to undermine CEQA's goal of transparency in environmental decisionmaking. Besides informing the agency decision makers themselves, the EIR is intended "to demonstrate to an apprehensive citizenry that the agency has in fact analyzed and considered the ecological implications of its action." (*No Oil, Inc., supra*, 13 Cal.3d at p. 86; accord, *Laurel Heights I, supra*, 47 Cal.3d at p. 392.) When an agency reaches a binding, detailed agreement with a private developer and publicly commits resources and governmental prestige to that project, the agency's reservation of CEQA review until a later, final approval stage is unlikely to convince public observers that before committing itself to the project the agency fully considered the project's environmental consequences. Rather than a "document of accountability" (*Laurel Heights I, at p. 392*), the EIR may appear, under these circumstances, a document of post hoc rationalization.

On the other hand, we cannot agree with the suggestion of the Court of Appeal, supported by Save Tara, that any agreement, conditional or unconditional, would be an "approval" requiring prior preparation of CEQA documentation if at the time it was made the project was sufficiently well defined to provide "meaningful information for environmental assessment." (*Citizens for Responsible Government v. City of Albany, supra*, 56 Cal.App.4th at p. 1221, quoting Cal. Code Regs., tit. 14, § 15004, subd. (b).) On this theory, once a private project had been described in sufficient detail, any public-private agreement related to the project would require CEQA review.

This rule would be inconsistent with the CEQA Guidelines' definition of approval as involving a "commit[ment]" by the agency. (Cal. Code Regs., tit. 14, § 15352, subd. (a).) Agencies sometimes provide preliminary assistance to persons proposing a development in order that the proposal may be further explored, devel-

oped or evaluated. Not all such efforts require prior CEQA review. (See, e.g., Cal. Code Regs., tit. 14, § 15262 [conduct of feasibility or planning studies does not require CEQA review].) Moreover, privately conducted projects often need some form of government consent or assistance to get off the ground, sometimes long before they come up for formal approval. Approval, within the meaning of sections 21100 and 21151, cannot be equated with the agency's mere interest in, or inclination to support, a project, no matter how well defined. "If having high esteem for a project before preparing an environmental impact report (EIR) nullifies the process, few public projects would withstand judicial scrutiny, since it is inevitable that the agency proposing a project will be favorably disposed toward it." (*City of Vernon v. Board of Harbor Comrs., supra*, 63 Cal.App.4th at p. 688.)

As amicus curiae League of California Cities explains, cities often reach purchase option agreements, memoranda of understanding, exclusive negotiating agreements, or other arrangements with potential developers, especially for projects on public land, before deciding on the specifics of a project. Such preliminary or tentative agreements may be needed in order for the project proponent to gather financial resources for environmental and technical studies, to seek needed grants or permits from other government agencies, or to test interest among prospective commercial tenants. While we express no opinion on whether any particular form of agreement, other than those involved in this case, constitutes project approval, we take the League's point that requiring agencies to engage in the often lengthy and expensive process of EIR preparation before reaching even preliminary agreements with developers could unnecessarily burden public and private planning. CEQA review was not intended to be only an afterthought to project approval, but neither was it intended to place unneeded obstacles in the path of project formulation and development.

In addition to the regulatory definition of "approval" quoted earlier (Cal. Code Regs., tit. 14, § 15352, subd. (b)), Save Tara relies on *Citizens for Responsible Government v. City of Albany, supra*, 56 Cal.App.4th 1199 (*Citizens for Responsible Government*) for the principle that an EIR must be prepared before a public agency executes a detailed agreement for development. In that case, the city council decided to place before the voters a proposal for development of a gaming facility at a race-track; included in the proposal was an agreement with the private developer setting out details of the proposed facility and its operation. (*Id. at p. 1206.*) Although the agreement called for the developer to submit any studies needed "to address any potential adverse environmental impact of the Project" and provided that "[a]ll reasona-

bly feasible mitigation measures shall become conditions" of the city's implementation agreement (*id. at pp. 1219-1220*), the appellate court held the city council had approved the project, for CEQA purposes, by putting it on the ballot, and thus the agreed-to environmental analysis came too late: "[T]he appropriate time to introduce environmental considerations into the decision making process was during the negotiation of the development agreement. Decisions reflecting environmental considerations could most easily be made when other basic decisions were being made, that is, during the early stage of 'project conceptualization, design and planning.' Since the development site and the general dimensions of the project were known from the start, there was no problem in providing 'meaningful information for environmental assessment.' At this early stage, environmental review would be an integral part of the decisionmaking process. Any later environmental review might call for a burdensome reconsideration of decisions already made and would risk becoming the sort of 'post hoc rationalization[] to support action already taken,' which our high court disapproved in [*Laurel Heights I*]." (*Citizens for Responsible Government, at p. 1221.*)

Again, without questioning the correctness of this decision on its facts, we find it falls short of demonstrating a general rule against use of conditional agreements to postpone CEQA review. The development agreement in *Citizens for Responsible Government*, once approved by the voters, vested the developer with the right to build and operate a card room within particular parameters set out in the agreement. The city had thus "contracted away its power to consider the full range of alternatives and mitigation measures required by CEQA" and had precluded consideration of a "no project" option. (*Citizens for Responsible Government, supra, 56 Cal.App.4th at pp. 1221-1222.*) "Indeed, the purpose of a development agreement is to provide developers with an assurance that they can complete the project. After entering into the development agreement with [the developer], the City is not free to reconsider the wisdom of the project in light of environmental effects." (*Id. at p. 1223.*)<sup>12</sup>

12 *Citizens for Responsible Government's* references to a "development agreement" were to development agreements as described in *Government Code section 65865.2*, which allows for only such conditions as "shall not prevent development of the land for the uses and to the density or intensity of development set forth in the agreement." The purpose of such agreements is to give "[a]ssurance to the applicant for a development project that upon approval of the project, the applicant may proceed with the project in accordance with existing policies, rules and regulations ... ." (*Gov. Code, § 65864, subd. (b); see*

*Citizens for Responsible Government, supra, 56 Cal.App.4th at pp. 1213-1214.*)

Desirable, then, as a bright-line rule defining when an approval occurs might be, neither of those proposed--the execution of an *unconditional* agreement irrevocably vesting development rights, or of *any* agreement for development concerning a well-defined project--is consistent with CEQA's interpretation and policy foundation. Instead, we apply the general principle that before conducting CEQA review, agencies must not "take any action" that significantly furthers a project "in a manner that forecloses alternatives or mitigation measures that would ordinarily be part of CEQA review of that public project." (*Cal. Code Regs., tit. 14, § 15004, subd. (b)(2)(B)*; accord, *McCloud, supra, 147 Cal.App.4th at p. 196* [agreement not project approval because, inter alia, it "did not restrict the District's discretion to consider any and all mitigation measures, including the 'no project' alternative"]; *Citizens for Responsible Government, supra, 56 Cal.App.4th at p. 1221* [development agreement was project approval because it limited city's power "to consider the full range of alternatives and mitigation measures required by CEQA"].)

In applying this principle to conditional development agreements, courts should look not only to the terms of the agreement but to the surrounding circumstances to determine whether, as a practical matter, the agency has committed itself to the project as a whole or to any particular features, so as to effectively preclude any alternatives or mitigation measures that CEQA would otherwise require to be considered, including the alternative of not going forward with the project. (See *Cal. Code Regs, tit. 14, § 15126.6, subd. (e).*) In this analysis, the contract's conditioning of final approval on CEQA compliance is relevant but not determinative.

A frequently cited treatise on CEQA (Remy et al., *Guide to the Cal. Environmental Quality Act (CEQA)* (11th ed. 2006)) summarizes this approach in a useful manner. "First, the analysis should consider whether, in taking the challenged action, the agency indicated that it would perform environmental review before it makes any further commitment to the project, and if so, whether the agency has nevertheless effectively circumscribed or limited its discretion with respect to that environmental review. Second, the analysis should consider the extent to which the record shows that the agency or its staff have committed significant resources to shaping the project. If, as a practical matter, the agency has foreclosed any meaningful options to going forward with the project, then for purposes of CEQA the agency has 'approved' the project." (*Id. at p. 71.*) As this passage suggests, we look both to the agreement itself and to the surrounding circumstances, as shown in the record of the decision, to determine whether an agency's authorization



or execution of an agreement for development constitutes a "decision ... which commits the agency to a definite course of action in regard to a project." (*Cal. Code Regs., tit. 14, § 15352.*)

Our analysis does not require CEQA analysis before a definite project has been formulated and proposed to the agency. An agency cannot be deemed to have approved a project, within the meaning of *sections 21100 and 21151*, unless the proposal before it is well enough defined "to provide meaningful information for environmental assessment." (*Cal. Code Regs., tit. 14, § 15004, subd. (b).*) Moreover, when the prospect of agency commitment mandates environmental analysis of a large-scale project at a relatively early planning stage, before all the project parameters and alternatives are reasonably foreseeable, the agency may assess the project's potential effects with corresponding generality. With complex or phased projects, a staged EIR (*Cal. Code Regs., tit. 14, § 15167*) or some other appropriate form of tiering (see *In re Bay-Delta etc. (2008) 43 Cal.4th 1143, 1170 [77 Cal.rptr.3d 578, 184 P.3d 709]; Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova, supra, 40 Cal.4th at p. 431*) may be used to postpone to a later planning stage the evaluation of those project details that are not reasonably foreseeable when the agency first approves the project.

#### IV. Application to City's Decisions

We turn finally to whether the city council's approval of the draft agreement on May 3, 2004, and the city manager's execution of the revised agreement on August 9 of the same year constituted approval of the 1343 Laurel project for purposes of *sections 21100 and 21151*. From the agreements and the surrounding circumstances, we conclude City did approve the 1343 Laurel project in substance, though it reserved some of the project's design details for later environmental analysis and final decision.

The contract between City and Laurel Place demonstrates City's commitment to the project. Both the May 3 draft and the August 9 executed agreements forthrightly stated their purpose was to "cause the reuse and redevelopment" of 1343 Laurel in accordance with the project as outlined in the agreements and in the earlier HUD grant application. The city council's May 3 resolution, similarly, stated the intent to "facilitate development of the project"--while allowing further public input on "the design of project elements."

In both versions of the agreement, moreover, City agreed to initially lend the developer nearly half a million dollars, a promise *not* conditioned on CEQA compliance. This predevelopment portion was to be advanced in the first phase of the agreement's performance,

before EIR approval and issuance of other final approvals, and was to be repaid from project receipts over a period of up to 55 years. If City did not give final approval to the project, therefore, it would not be repaid. For a relatively small government like City's, this was not a trivial outlay, and it would be wasted unless City gave final approval to the project in some form.

While both versions of the agreement conditioned conveyance of the property and disbursement of the second half of the loan on CEQA compliance, among other conditions, the May 3 draft agreement significantly circumscribed City's remaining authority in this regard. Under the draft agreement, whether CEQA requirements had been met was to be "reasonably determined by the City Manager," language that could have left City open to charges it acted unreasonably, had it ultimately declined to certify the EIR or make any needed CEQA findings.

In addition, the May 3 draft agreement, in setting the condition that all "requirements of CEQA" be "satisfied," arguably left open the question whether City remained free to find that the EIR was legally adequate and yet to reject the project on substantive environmental grounds. An EIR that "satisfies" CEQA "requirements" may nonetheless demonstrate the project carries with it significant immitigable adverse effects. The May 3 draft agreement's condition does not clearly encompass the possibility that in such a situation City could decline to find, pursuant to *section 21081, subdivision (b)*, that the project's benefits outweigh such immitigable effects.

Finally, the May 3 draft agreement had no provision for appealing to the city council the city manager's decision on, or waiver of, CEQA compliance. Such a delegation of the council's authority was itself an impermissible attempt to approve the project without prior CEQA review. (See *Sundstrom v. County of Mendocino (1988) 202 Cal.App.3d 296, 307 [248 Cal. Rptr. 352]* [permit condition requiring applicant to submit environmental study to the planning commission and adopt any mitigation measures formulated by commission staff was an improper delegation of CEQA responsibility to staff and an impermissible postponement of environmental review].)

After Save Tara sued, alleging some of these same flaws in the May 3 draft agreement, City staff revised the agreement to repair them. Under the August 9 executed agreement, the city manager no longer had authority to determine or waive CEQA compliance, and City's "complete discretion" over CEQA matters was expressly acknowledged. But the city council had already approved the May 3 draft agreement, by which it had shown a willingness to give up further authority over CEQA compliance in favor of dependence on the city manager's

determination. Given that history, as well as the other circumstances discussed below, City's "apprehensive citizenry" (*No Oil, Inc.*, *supra*, 13 Cal.3d at p. 86) could be forgiven if they were skeptical as to whether the city council would give adverse impacts disclosed in the EIR full consideration before finally approving the project.

Circumstances surrounding City's approval of the agreements confirm City's commitment to the 1343 Laurel project. In aid of Laurel Place's HUD grant application, the city manager told the federal agency City "has approved the sale of the property" and "will commit" up to \$ 1 million in financial aid. Once the grant was awarded, City's mayor announced it "will be used" for Laurel Place's project, and the City newsletter stated that, using the grant, City and Laurel Place "will redevelop the property." City officials told residents who opposed the project that while "variations" on the proposal would be entertained, City "must continue on a path that fulfills this obligation" to redevelop the property for senior housing. Similarly, at the May 3, 2004, city council meeting, City's housing manager stated that while there were "options to consider" regarding project design, options for other uses of the property (as a park, library, or cultural center) had already been ruled out.<sup>13</sup>

13 At oral argument, counsel for City and Laurel Place urged strenuously that expressions of enthusiasm for a project by an agency's staff members should not be confused with official approval of a project. We agree. In isolation, such statements could rarely, if ever, be deemed approvals for CEQA purposes. Here, of course, we weigh statements by City officials not in isolation but as one circumstance shedding light on the degree of City's commitment when it approved the May 3 and August 9 agreements. It bears noting, as well, that one of the statements upon which we rely was a communication from City's mayor, another appeared in an official City newsletter, and others were from City's housing manager, who, having been named in the mayor's announcement as the contact person for residents with questions about the proposed development, had apparent authority to speak for City on this topic.

Finally, City proceeded with tenant relocation on the assumption the property would be redeveloped as in the proposed project. After HUD awarded the grant, City's housing manager told a tenant that she would be relocated, though not for a year or so. Around the same time, other tenants reported being contacted by relocation consultants, who told them they would soon be given one-year notices. As part of its May 3, 2004, resolution, the city council authorized the predevelopment loan in order to, among other things, "begin the process of

working with tenants to explore relocation options." The May 3 draft and August 9 executed agreements provided that Laurel Place would "complete the relocation of tenants" in the agreement's first performance phase, that is, *before* final project approval was given and the property conveyed to Laurel Place. A staff report on the May 3 draft agreement stated that relocation notices, with a one-year period, would be sent shortly after the agreement was executed. The August 9 executed agreement further specified the process was to begin within 30 days.

Relocation of tenants is a significant step in a redevelopment project's progress, and one that is likely to be irreversible. City's willingness to begin that process as soon as the conditional development agreement was executed, and to complete it before certifying an EIR and finally approving the project, tends strongly to show that City's commitment to the 1343 Laurel project was not contingent on review of an EIR.

In summary, City's public announcements that it was determined to proceed with the development of low-income senior housing at 1343 Laurel, its actions in accordance with that determination by preparing to relocate tenants from the property, its substantial financial contribution to the project, and its willingness to bind itself, by the May 3 draft agreement, to convey the property if the developer "satisfied" CEQA's "requirements, as reasonably determined by the City Manager," all demonstrate that City committed itself to a definite course of action regarding the project before fully evaluating its environmental effects. That is what *sections 21100 and 21151* prohibit.

## CONCLUSION

For the reasons given above, we agree with the Court of Appeal that City must be ordered to "declare void its approval of the May and August 2004 Agreements" and to reconsider those decisions in light of a legally adequate EIR for the project. (See § 21168.9, *subd. (a)(1)*.) If that reconsideration leads to approval of the project, City must make any appropriate findings under *section 21081*.

Unlike the Court of Appeal, however, we do not believe City necessarily must prepare a new EIR before reconsidering its approval of the project. The parties agree City certified a final EIR for the project in 2006, during pendency of this appeal, and Save Tara did not judicially challenge that EIR's legal adequacy.

The 2006 EIR was prepared after City approved the May 3 and August 9, 2004, agreements, which approvals must be now vacated. To the extent the 2006 EIR's discussion of project alternatives and mitigation measures was premised on City's 2004 approvals, that discussion may need revision. Moreover, by the time of our remand

more than two years will have passed since the EIR was certified in October 2006. Because of both these factors, it is possible that "[s]ubstantial changes [have] occur[red] with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report" or that "[n]ew information, which was not known and could not have been known at the time the environmental impact report was certified as complete, [has] become[] available." (*Pub. Resources Code*, § 21166, *subds. (b), (c)*; see also *Cal. Code Regs.*, *tit. 14*, §§ 15162, 15163 [subsequent and supplemental EIR's].) Whether this is so must be decided in the first instance by City and reviewed by the superior court on a substantial evidence standard. (See *Santa Teresa Citizen Action Group v. City of San Jose* (2003) 114 Cal.App.4th 689, 704 [7 Cal. Rptr. 3d 868].)

This matter must therefore be returned to the superior court for that court (1) to order City to set aside its prior approval of the project; (2) if City decides no subsequent or supplemental EIR is required under *section 21166*, to review that decision; and (3) to make any other order necessary and proper under *section 21168.9*.

#### **DISPOSITION**

The judgment of the Court of Appeal is affirmed in part and reversed in part. The matter is remanded to the Court of Appeal for further proceedings consistent with our opinion.

George, C. J., Kennard, J., Baxter, J., Chin, J., Moreno, J., and Corrigan, J., concurred.

On December 10, 2008, the opinion was modified to read as printed above.

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**RE: Second Renewed Public Records Request  
& Public Notice of the Preparation of A Program Environmental Impact Report And Scoping Meeting**  
Pure Water Program Point Loma San Diego PEIR/PN Initial Comments 5.

Dear Ms. Herman,

Merry Christmas and thank you for the opportunity to comment on the above captioned notice. This is my fifth set of comments, as I have already commented on three earlier occasions, during this initial scoping process [Written comments of December 9, 2014; Oral Testimony at the hearing of December 11, 2014; Nine pages of handwritten comments presented to you on December 11, 2014, at your hearing, and written comments sent by First class Mail and e-mail on December 24, 2014]. I again raise concerns regarding the apparent predetermination of a project by the Cities Executive and Legislative branches, prior to the conduct of either the NEPA or CEQA analyses. I bring to your attention *Tara v West Hollywood [SAVE TARA, Plaintiff and Appellant, v. CITY OF WEST HOLLYWOOD, Defendant and Respondent; WASET, INC., et al., Real Parties in Interest and Respondents. S151402 SUPREME COURT OF CALIFORNIA 45 Cal. 4th 116; 194 P.3d 344; 84 Cal. Rptr. 3d 614; 2008 Cal. LEXIS 12737; 39 ELR 20272 ]* –attached. At the December 11, 2014 hearing, I raised objection to engineering staff's presentation of a single exclusive project. I request that as you prepare the environmental studies that provide the ratepayers with a full and fair presentation of the alternatives to provide water and sewage treatment for San Diego.

The first page of my December 11, 2014 Hand Written Comments, delivered to your hand at the hearing, made a written Public Records request for access to the documents , including consultant contracts that have been used or engaged in preparation of the San Diego Pure project. This written request was made under cited California state law and provisions of our own City of San Diego Charter – attached. It has been more than ten days and I have not heard from you or your office, Perhaps with the holiday season your response has gotten lost in the mail; but I wanted to review these documents before completing my scoping comments. I renewed this request in my written comments of December 24, 2014. Please respond to my request for public records and provide me an opportunity to comment on the proposed environmental study's scope based on a review of the requested documents. Extension of the scoping comment period would be an appropriate remedy.

These comments concern primarily sustainability of each any alternative presented and compared in your upcoming CEQA/NEPA study/report. A fair professional presentation would first list and callout remedial actions necessary under any alternative to comply with Climate Action Plans and Global Warming requirements. This universal call out list should also include the

changes necessary to provide modern compliant purity in long distance transmission water systems, removal of any Asbestos from the system or other toxins, and additional storage and/or reservoirs facilities. If there are some capital and operational costs that are not common to all alternatives they should be called out and described in detail.

During staff's public presentations, staff failed to estimate and fully cost the replacement of Regional Public Safety Training facility, which had been held for future development of standard treatment facilities and now proposed for the Pure Recycling plant. Staff also gave the impression that the Pure recycling proposal was now the only feasible plan since the existing Point Loma treatment plant site was too small. The need for additional standard treatment facilities has been long known and the subject prior proposals and reports. Continued use of this Point Loma's too small so there is only one choice, infers that the City is just now beginning planning for meeting its clean water obligation and by extension no other City Department, city Manager or Mayor since and including the Honorable Mayor Pete Wilson gave this need and subject any practical study about this before the current administration. If it is true that the City had no alternative plans until now; please state this in the introduction to the CEQA/NEPA study/report or in the alternative provide a fair history, with references to past studies and reports.

During staff's public presentations, staff failed to discuss the other very large and pending clean water challenge facing the City – Storm Water. The City is already falling behind on meeting its remedial measures to meet the clean water aspects of storm water. There have been proposals to include Storm Water treatment in future sewage treatment facilities. Please discuss and present any plans or proposal for integrating storm water treatment into sewage treatment or water supplies. If costs of these additional facilities are known estimated or available please include them in your report/study. The public could lose confidence in their government if after being sold a major and costly new water and sewage system; they were then blindsided by an additional storm water system.

During staff's public presentations, staff failed to discuss the energy costs associated with the recycle and redeliver pure program versus expansion of the current system; an improved sewage treatment system and expanded traditional water system; an indirect recycle and reservoir mellowing alternative; and other reasonable alternatives that have been the subject of past studies or use in our neighboring counties. Given the need for meeting the City's climate change and carbon reduction plans and responsibilities, one would expect that all alternatives would utilize sustainable energy production systems and energy saving and storage systems. Please apply the same energy systems to all alternatives equally or explain fully why different options could not be applied to one alternative versus another alternative.

Please provide the basis for energy calculations. An appendix should be provided which demonstrated the basis for any estimates of energy costs or related other operational costs. A reader of your study/report should be able to re-calculate any estimates presented based on the data and formulas presented in your report/study and its appendixes.

During staff's public presentations, staff failed to present the current energy, personnel, waste disposal, and related operational costs, as they exist now or could be reasonably estimated for the foreseeable future. These current operational energy, personnel, waste disposal and other related operational costs should be compared to operational costs estimated for each of the alternatives



presented in the study/report. I would expect that the Pure proposal would have significantly higher energy costs because of the additional energy required for pressurized filter pumping and then pumping of the water back to the sources. My understanding is that much of the current system is gravity fed and managed; requiring less energy than a re-pump system. The study/report prepared should clearly demonstrate and illustrate a fair comparison of the current and expanded system versus each of the reasonable alternatives.

I am concerned regarding the existing and possible health and safety of human consumption water being and to be delivered under any systems the City of San Diego chooses. Earlier comments raised concerns regarding possible delays in conversion away from chemical purification and long distance transmission water purity. When will the City address fully concerns raised regarding the treatment of water with Chloramine, a long lasting chemical used when transmission distances are extended from source? Will any proposed alternative continue the use of this class of chemicals? Can any or all of the alternatives accelerate the use of other proposed technologies to insure pure water delivery from the source to distant consumers? Will any alternative make removal a first priority or will it be phased , and how? Why not fix current purity and safety problems now?

In past written comments, I have raised the concern about the full removal of Asbestos containing pipes in the water and sewer systems. Do the current systems utilize any pipes or equipment that contains Asbestos? How much , where, and what is it used for? If so what is the proposal, under any alternative, to remove this Asbestos from both the Sewer and Water systems, particularly now that they may be interconnected? Will any alternative make removal a first priority or will it be phased , and how? Where and how will the Asbestos contamination be decommissioned and disposed of? Why not fix current purity and safety problems now?

I am concerned that there may be attempts to influence Council in adopting the results of the Study /Report by the City's Mayoral Executive branch department personnel or private non-governmental individuals posing as stakeholders or some kind of special committee. I request that the executive branch, your department and other members of the City staff not permit such communications or organize any nonpublic meetings. I reference City Attorney Opinion LO-95-2 Limitations on Councilmember Participation in Environmental Document Process review.

Overall, I am concerned that the Pure program is premised on a continuation of unsustainable regional growth rates and ignores the linked growth in our region's Sister co-joined City -Tijuana. Experience demonstrates that any growth in San Diego is proportionally matched with growth in Tijuana. Our region faces major ocean and land contamination from the ever expanding storm water and sewage runoff from our Sister and partner in this region. Growth here fosters growth there and the demands for resources with associated pollution and sewage follows.

Please provide the basis for any population changes. Documentation of the methods used to arrive at any population estimates should be included and presented in your study/report. Please do not simply refer to some other agencies' estimate without demonstrating that it is based on sound mathematical formulas.

I do not believe that conformance with our City's and County's Climate Action mitigation responsibilities allow a business as usual approach with endless growth. . The City in its program

EIR and or EIS must demonstrate how it intends to mitigate the impacts of climate change by achieving meaningful greenhouse gas (GHG) reductions within the County, consistent with Assembly Bill No. 32, the governor's Executive Order S-3-05, and CEQA guidelines (Cal. Code Regs., tit. 14, § 15000 et seq. [CEQA Guidelines]). The City should perform environmental review that meets both the California Environmental Quality Act (CEQA) and the Federal National Environmental Protection Act (NEPA). We can no longer adopt the convenient fiction that Tijuana, with its cross boarder sewage and traffic, is not part of our region's environmental setting.

Please immediately respond to my aging Public Records disclosure request. Please extend the comment period until such time as I have had reasonable time to inspect the records requested and make comment based on these records. . I have attached 4 documents that are herein incorporated as part of my comments by reference. These attachments are a History of San Diego Water; The 2015 budget of the Public Utilities Department; City Attorney Opinion restricting Council discussion of CEQA matters; and Section 215 of the SD City Charter on Public record access.

Please provide written response to my comments and include me in the list to receive notice of any further documents, hearings, opportunities to comment on these matters. Please provide the public with a machine readable copy of your report/study. I am particularly requesting adequate public notice of any stakeholder or advisory body convened or associated with this analysis or the San Diego PURE program or its successors.

Happy New Year and all the best.

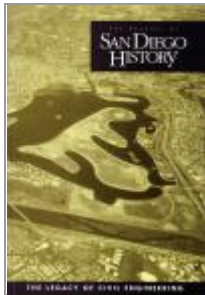
Respectfully submitted

,s/

John Stump

Attachments

THE JOURNAL OF  
SAN DIEGO  
HISTORY



[The Journal of San Diego History](#)

SAN DIEGO HISTORICAL SOCIETY QUARTERLY

[Winter 2002, Volume 48, Number 1](#)

Gregg Hennessey, Editor

## WATER SUPPLY DEVELOPMENT IN SAN DIEGO AND A REVIEW OF RELATED OUTSTANDING PROJECTS

by Mike Sholders

[Images from this article](#)

People create cities near water to maximize opportunities for commerce, recreation, and most importantly to ensure drinking water for the population. In San Diego County, natural streams and lakes are very small, compared to other large cities, and most are in the coastal range many miles from the metropolitan area.

San Diego is classified as a semiarid section of the United States and has so little annual rainfall that the agricultural area is continuously dependant upon irrigation. The average annual rainfall on the County's coastal plain over the last 150 years is about 10 inches. Mountain streams provide only a limited and extremely variable water supply. Many reservoirs have been constructed to store water for use in dry years and to provide regulation of water flow. Only a few watersheds have reliable groundwater, and their wells provide only a small percentage of the water needed for the County's large agricultural producers.

Fortunately, the early pioneers and community leaders planned for and constructed water supply facilities that were necessary to sustain the County's population. They also had the vision to recognize the need for imported water from the Colorado River and other sources. The planning and construction of water supply facilities for sufficient imported water has been a serious issue that still remains today.

This article addresses the history of the planning and construction of the major water supply facilities that make San Diego one of the finest and most desirable cities in the world. Also, it will emphasize the role and importance of civil engineering to the water supply development in San Diego County.

The history of water utilization in San Diego County may be broken down into four periods: the Mission Period (1769-1834), the Early California Period (1835-1885), the Boom Period (1886-1895), and the Present Day Period or Planned Development (1869 to the present).

The Mission Period, from 1769 to 1834, was characterized by the efforts of the Franciscan missionaries to obtain water for the Mission San Diego de Alcalá and for the Presidio. There were many attempts to obtain a good source of water supply. The first was water from the dug wells in the gravels of the San Diego River. Later efforts to obtain a good supply included ditches with sand and brush diversion dams and storage of water in small reservoirs and cisterns. These efforts culminated in the construction of the Padre Dam (Old Mission Dam) in 1816, a brick and mortar storage and diversion dam near the head of Mission Gorge and an aqueduct to carry the waters to the Mission and the Mission lands. The Padre Dam itself is still in existence. However, since its completion, some portions of the dam have been destroyed by floods.

The Early California Period, from 1835 to 1885, is best characterized by the lack of any coordinated or planned development of a water supply. From 1834 to 1872, almost all water was obtained from dug and drilled wells, both in the San Diego River and the New Town (downtown San Diego) area. In 1873, the first planned development of water was started, with the incorporation of the San Diego Water Company. During the early years of the company, water was still pumped from wells and distributed to consumers in both San Diego and Old Towns.

The Boom Period of 1886-88 saw San Diego's population grow at tremendous rate, and the entire population seemed to think that San Diego and the County area were going to continue growing rapidly. Developers, investors, and speculators planned immense water conservation projects and, within a period of fourteen years, formed many water-related companies. These ventures included: the San Diego Land and Town Company in 1881, the Otay Water Company in 1886, Linda Vista Irrigation District also probably in 1886, the San Diego Flume Company in 1886, the Mount Tecate Land and Water Company in 1897, the Pamo Water Company in 1888, and the Southern California Mountain Water Company in 1895.

There were numerous other plans that never had a name or reached the incorporation stage. Engineering achievements during this period include the building of the Sweetwater Dam and distribution system and the Cuyamaca Dam and flume. After the completion of Cuyamaca Dam and flume, water was purchased from the San Diego Flume Company and distributed to the populace.

A more planned period of development began after the boom was over. Only three of the companies listed above survived the drought of 1895-1904; the Otay Company, the Flume Company, and the Mountain Water Company. However, the plans of those that failed pointed the way to later developments. In fact, all the major reservoirs that are being considered for development at the present time, or that have been built, were a part of the plan of at least one of those original companies.

At the turn of the last century, the City of San Diego began purchasing some of the properties of the existing water companies to ensure a reliable water supply for its population. In 1901, the City purchased the facilities of the San Diego Water Company that lay within the City limits for \$600,000. In February, 1913, it purchased the Barrett-Otay System from the Southern California Mountain Water Company for \$2,500,000. In 1920, the City began purchasing water from the San Dieguito Mutual Water Company. Five years later, it purchased the San Dieguito system from the San Diego County Water Company for \$3,750,000.

The City of San Diego also began building water projects itself. In 1913, the City built the Mission Valley pumping station. The following year the Bonita pipeline, eight miles of 28-inch riveted steel pipe, was installed. During the 1916 flood, the Otay reservoir dam, built of rock fill with a steel plate core, was overtopped and destroyed. In 1917 and 1918, the Otay reservoir dam was replaced with a gravity section concrete arch dam 145 feet high. Then, over the period of 1921 to 1923, Barrett Dam, a gravity section concrete arch dam 171 feet high, was constructed. Lakeside-University Heights pipe line, 17 miles of 36-inch lock joint riveted steel pipe, was installed in 1927. In that same year, the Lakeside and Riverview pumping plants were installed. Work was undertaken in 1927 through 1931 to improve the spillway at Hodges Dam. In 1928, a water filtering plant was built in University Heights, with sixteen gravity filter units. The lower Otay-San Diego second main pipeline was installed in 1929, with 8.1 miles of 40-inch electric welded steel pipe, another 8.1 miles of 36-inch pipe. The El Capitan Dam, a fill-rock embankment, 217 ft. high, was completed in 1935 at a cost of \$3,000,000. These are just a few of the projects that provided a reliable water supply to San Diego County.

Early in the last century, planners began looking for sources of water beyond the local watersheds. Civil Engineers began working on the development of the Colorado River as early as 1902, when Congress enacted the Reclamation Act. A special appropriation was awarded to the Bureau of Reclamation in 1914, for intensive studies of the river basin. Civil Engineers in the U.S. Geological Service provided the basic data needed from stream gauging stations that was used to predict the amount of water available for conservation and development purposes. These studies were completed and a report compiled by the Bureau of Reclamation Project Engineer, John T. Whistler, in March, 1919.

More funds were made available for further studies in May, 1920 and the Chief Engineer for the Bureau of Reclamation, Frank E. Weymouth, directed further investigations. This resulted in a famous report known as the Fall- Davis Report that was submitted to the Senate in 1922. This report recommended the construction of the All- American Canal to serve Imperial Valley and the

construction of Boulder Dam, later known as the Hoover Dam. This report was the substance of the Swing- Johnson bill authored by Senator Hiram E. Johnson and Congressman Phil Swing of California. Wemouth prepared a report in February, 1924, that fixed the site of the Boulder Dam at Black Canyon. This report caught the attention of Engineers and political leaders in southern California and resulted in the formation of the Metropolitan Water District in 1928. Mr. Weymouth became the first Chief Engineer and General Manager of the Metropolitan Water District.

The Colorado River Compact was developed in 1922 by another engineer, Herbert Hoover, who was then the Secretary of Commerce. This Compact apportioned the use of the Colorado River water between its upper and lower basins, with the point of division at Lees Ferry. The upper basin states are Wyoming, Colorado, Utah and New Mexico. The lower basin states are Nevada, Arizona and California. The apportionment to each of the states was to be 7,500,000 Acre Feet per year for beneficial consumption, with a further grant to the lower basin states to increase their use by 1,000,000 acre feet per year. Arizona refused to ratify the Compact, so it applied just to the other six states. A provision in the final version limited the use of California to 4,400,000 acre feet per year, plus not more than one half of the surplus water not apportioned. The six states ratified the Compact by 1929, and the Boulder Dam Project was adopted by Congress, with the provision that applied, at the time, only to the six states. Herbert Hoover, now president, issued the final proclamation on Mar 6, 1929. Arizona finally ratified the Compact in February, 1944.

The San Diego City Council first discussed the necessity for drawing water from the Colorado River on July 25th, 1921. Dr Elwood Mead, the Director of the Bureau of Reclamation was very supportive of the idea and defined the many benefits that the City could derive by filing for a permit to obtain Colorado River water. On May 18, 1923, the Boulder Dam Association supported this concept. This group consisted of many influential citizens in southern California, and John L. Bacon, Mayor of San Diego was its first president. Following a systematic and effective campaign of public education, the demand for action was culminated on April 18, 1926, when Bacon signed an application to the State Division of Water Resources for the right to deliver 112,000 acre feet per year from the Colorado River. This application was later broadened to include the County of San Diego.

Two contracts assured the benefits of the Hoover Dam and Lake Mead to the City and County of San Diego. The first, the result of much effort by San Diego's Civil Engineer H.H. Savage, was executed on February 15, 1933 and provided 250,000 acre feet of capacity in Lake Mead and for the delivery of 112,000 acre per year to San Diego at a point in the river immediately above Imperial Dam. The second achievement by Mr. Savage, in co-operation with Congressman Phil D. Swing, dated October 2, 1934, provided for the construction a diversion dam, main canal and appurtenant structure for the all American Canal to satisfy the 153 cubic feet per second (cfs) allotment of lake-river water for San Diego.

Construction of an aqueduct to bring Colorado River water to the Los Angeles area began as soon as work on Boulder Dam was under way. As financed and constructed by the Metropolitan Water District of Southern California, the Colorado River Aqueduct is designed, with some ultimate enlargement, to



deliver 1500 cfs to the District's present fourteen constituent areas and to other areas that may become annexed to the District. The Aqueduct was completed and placed under operation in 1941, at a cost of \$190,000,000.

However, this did not get the water to San Diego. World War II caused a great increase in water consumption in San Diego, and it became imperative to bring Colorado River as soon as possible. The Bureau of Reclamation completed studies in 1943, comparing the costs of two possible connections for linking with the Los Angeles area aqueduct. An office was opened in Escondido and field surveys were completed.

In early 1945, military establishments, war industries, and war housing projects were using over 50 per cent of the water being delivered to consumers from the San Diego water system, and a threatened shortage in the City water supply had become a problem of national importance. An interdepartmental committee was appointed by the President of the United States to study the water supply of the city and to recommend a plan for securing a supplemental supply. The report of the Committee was published as Senate Document No. 249, 78th Congress, 2d Session. It recommended the immediate construction by the Federal Government of an aqueduct connecting with the Colorado River Aqueduct near San Jacinto, with the War Department, the Navy Department and the Federal Works Agency bearing the cost (estimated at \$17,500,000). The recommended emergency aqueduct was to have a design capacity of 85 cfs. Tunnels and other permanent structures were to be constructed with a design capacity of 165 cfs, provided the bids to be received for such portions of the project indicated an increase of cost no greater than would warrant this action. The report further recommended "that the San Diego County Water Authority or the City of San Diego continue and press negotiations with the Metropolitan Water District of Southern California to the end that an equitable arrangement be worked out, which would make possible permanent service by way of route 1 (the emergency aqueduct connection) in order that the value and permanent utility of the emergency work may be realized, and to protect against the possibility of an interruption in the supplemental water supply on the termination of the war emergency." The committee's report and recommendations, dated October 21, 1944, were accepted by the President of the United States. Directives were issued to the departments concerned to proceed with construction. After welcoming some opposition from other Federal Agencies, construction began in the fall of 1945.

The San Vicente Aqueduct was designed as a gravity conduit, tapping the Colorado River Aqueduct of the Metropolitan Water District at the westerly portal of San Jacinto tunnel, and extending in a southerly direction to discharge into San Vicente reservoir. The total length is 71.1 miles, of which 30.4 miles are in Riverside County and 40.7 miles are in San Diego County. From the regulating reservoirs near the San Jacinto tunnel to San Vicente reservoir consists of pipelines and tunnels are of sufficient size to carry the full capacity of 185 cubic feet per second. The San Diego Aqueduct was completed and placed in operation in December 1947, providing for about one half of the ultimate capacity needed. Construction of a second barrel was completed by the County Water Authority in 1954 and a second aqueduct was completed in 1958.

One unique feature of the San Diego Aqueduct is that the elevation at the Lake Mathews Metropolitan Water District connection is so high that all of the deliveries to the member agencies are by gravity so that pumping is never required. The quality of water from the Colorado River depreciates each year with regard to total dissolved solids, affecting water hardness, and is approaching unacceptable limits. Therefore, further river water from the California Aqueduct is needed to improve quality. Other sources of water such as seawater distillation and wastewater reclamation are constantly being evaluated. So far, these supplies are either too expensive or not acceptable as portable water.

The San Diego County Water Authority, consisting of five cities, three irrigation districts and one public utility district, was organized June 9, 1944, under an enabling act of the California State Legislature known as the County Water Authority Act. The primary purpose was to import Colorado River water to San Diego County. The Water Authority staff consists of 34 Board Members and a staff of Engineers that occupy a \$16,000,000 facility in San Diego and a smaller field office in Escondido. These engineers and staff are busy planning new projects that will improve the reliability of the system to accommodate the predicted population to the year 2050.

The California Aqueduct became a second major aqueduct system to bring water to Southern California. It captures water from the Feather River, funnel its south through the Sacramento/San Joaquin Bay-Delta, feeds it into the California Aqueduct, pumps it over the Tehachapi Mountains, and delivers it to reservoirs near the Antelope Valley north of Los Angeles. This aqueduct, also called the State Water Project launched a bitter north-south controversy. Northern Californians asked, "Why should the southerners be allowed to steal our water?" Southern Californians countered, "It's not their water; it's California's water and we're all Californians. Eventually, under the leadership of Governor Pat Brown, the State Water Project was built, and it started delivering water to Southern California. With that new resource, both the County Water Authority and the Metropolitan Water District could make good on their commitments to provide water to new areas - for a while. One controversial component of the original plan, a "Peripheral Canal" around the environmentally sensitive Delta, was never built. As a result, the State Water Project has never delivered as much water as originally intended. The effort to find an alternative method to deliver the full contracted amount continues to this day. Concern over environmental and ecological degradation in and around the Delta complicates the problems. During the 1990's, Governor Pete Wilson and President Bill Clinton initiated an unprecedented collaboration of state and federal agencies, as well as urban, agricultural, and environmental groups, to develop a long-term solution that restores the Bay-Delta as both a reliable water supply and a healthy habitat for fish and wildlife. This collaborative body became known as the CalFed Bay-Delta Program. San Diego County hopes to benefit from that solution with a more reliable water supply and higher-quality drinking water.

Since the State Water Project supplemented water supplies from the Colorado River, San Diego County now relies on imported water for 75 to 95 percent of its total supply. In 2002, almost three million people living and working in San Diego County depend upon the County Water Authority to make the investments necessary to secure and deliver a reliable water supply. The Authority and its

member agencies finance and maintain the water supply and delivery system necessary to support the near 90 billion a year economy and quality of life enjoyed in San Diego County. Significant milestones in planning for the future include a water conservation and transfer agreement between County Water Authority and the Imperial Irrigation District that will provide up to 200,000 acre feet per year until the year 2073. This agreement represents that largest long-term water transfer in the U.S. history. Also part of future planning is the Emergency Water Storage Project, a system of reservoirs, pipelines and other facilities to increase emergency storage and pumping capabilities critical to the reliability of water supply. This action will ensure the region has enough water and flexibility to deliver the water during potential disruptions due to draught, earthquakes of other disasters.

Dated: December 10, 2014

Environmental Planner

Presented by email to: Ms. Myra Hermann,

City of San Diego  
Development Services

PLEASE CONFIRM DELIVERY by email TO

[scott300@earthlink.net](mailto:scott300@earthlink.net)

Dear Ms. Herman,

The City of San Diego combines its urban industrial runoff and sewage discharge for majority processing at the Point Loma Wastewater Treatment Plant.

Treatment of both discharges, under both extended federal EPA and RWQCB-enforced Clean Water Act NPDES permit waivers for secondary or tertiary treatment, and California law, is currently illegal and harmful to the health of the Pacific Ocean resource.

Growing residential and industrial use, drought and climate change, with population increases in the dual city border region of San Diego and Tijuana, impact both a sustainable future human water supply and marine life subject to the cumulative impacts of 50 billion gallons yearly of toxic under treated sewage and storm water contamination.

San Diego families and marine life, as sensitive receptors, are subject to the health impacts of ingesting or absorbing through the skin chemical waste discharge.

In addressing drinking water, the "Toilet to Tap" or "Pure Water" facility developers ignore EPA-violations to the ocean with the exception of

a brief reduction, followed by a return then exceedance of current levels of under treated discharge as assured by binational infill population growth - an environmental

disaster Pure Water wants protected by a perpetual waiver to Clean Water Act standards. No ocean or those who swim in it, human or marine mammal, should be declared

off-limits to science or regulation by the lobbyists of the commercial Pure Water developer — a special interest seeking perpetual immunity re the Pacific's survivability

as a clean and safe California natural, water, food, and recreational resource.

Please find below our comments on scoping the EIR:

1. As the sewage effluent waiver is a federal matter, we request a joint CEQA and NEPA study of all alternatives under binational context., not just the one pre-selected. The Pure Water option adds drinkable at the expense of marine life. Study the adequacy of secondary in the context of accelerating impacts to the marine ecosystem subject to contamination, eutrophication, nitrogen-loaded algae, possible sea star virus, climate change, over fishing, illegal toxic dumping, pesticides, and acidification. What is RWQCB mitigation required for prolonged board-permitted City discharge levels?

2. Publish notices and study results in English, Spanish, and Tagalog.

3. Compare the SANDAG infinite growth model to alternative sustainable growth models that acknowledge limited water resources for all uses,

and responsive to legal decisions supporting compliance with storm water, sewage discharge, marine species protection, and climate change carbon capping laws.

4. Study phasing of water quality improvements under chloramine impacts vs. non-chemical treatments like ozone, peroxide, tertiary, reverse osmosis, uv exposure

in facilities and natural water bodies like rivers, lakes, reservoirs, and canals.

5. Study closure of sewage outfalls per the Surfrider Florida campaign, injection of treated effluent in fracking, combustion, and other new international treatment technologies.

6. Publicly notice in a timely fashion any stakeholder meetings or non-public employees insider working groups.

7. Consider gray water plant use as suggested by the San Diego City Council or advanced treatment of

gray water to drinkable.

8. Financing: Reveal projected over the next decades total anticipated taxpayer water rate increases, storm water treatment fees, infrastructure fees, and water rate increases needed to fill proposal funding gaps. Report common cost overruns for a \$3.5B multiple plant, pump, and pipeline project, and list speculative grant sources.

Report cost of replacing the Liberty Station police and fire training facility.

9. Quantify projected amounts of San Diego water supply from \$60B Southern California dual Delta tunnel project and announced desalination plants Camp Pendleton, Oceanside, Carlsbad, and Rosarito Mexico.

10. Study proposals' and alternatives' respective cumulative toxic and nitrogen loading impacts in the dual municipal discharge zone of the Pacific from bordering San Diego and Tijuana. Include plume study of source points and northern currents from Mexico via effluent impacts on San Diego Bay, an impaired water body, and

Mission Bay nurseries for commercial and sport fishing forage and primary species. Report NOAA baseline fish population studies available and needed.

11. Identify largest single source business and industrial sewage producers for potential on-site treatment under U.S. military base models.

12. List hundreds of municipal sewage's toxic industrial waste chemicals, many household pharmaceuticals like estrogen disruptor compounds, and personal care products.

Provide the EPA human ingestion and recreational skin exposure limit standards for all of these re Maximum Contamination Levels. In absence of any testable and verifiable standards, list those.

13. Toilet to Tap is also a Toilet to Ocean scheme. "Pure Water" in fact leaves, in 2050, after spending upwards of \$3.5 billion, Pacific Ocean marine life, known in decline or extinction pressures, illegally subjected to the same level of 50 billion gallons per year under treated and raw regional sewage that it is today in 2015.

Infill development fronted by Pure Water spokesmen guarantees their plan will fail to improve the health of the ocean or those who use it.

The EPA awarded it's three successive waivers in good faith to the last U.S. city out of compliance anticipating City move to secondary or new tertiary.

The city admits sensitive human receptors drink contaminated Colorado River and northern canal water downstream. Why is regulator policy to arbitrarily

perpetuate people's exposure to these untreated source when the same expenditures could improve both human and salt water quality?

Study the cost and applicability of treating this reservoir water with reverse osmosis and UV or other researched technologies coming on line.

This will allow the majority of San Diego drinking water is purified to the extent of the minority portion proposed by "Pure Water" developers.

14. Fully examine the methodologies and regional water savings of an extensive, creative, and enforced conservation policy.

15. Study the cost and technologies of bringing San Diego sewage to both CWA and higher standards, knowing in a double load discharge zone area beaches will be

exposed to raw sewage from the border for the foreseeable future whose volumes and impacts will grow with population.

16. Study the alternative techniques hundreds of other major cities have used to comply with the law and to eliminate outfalls all together to save reefs worldwide.

Submitted By,

Scott Andrews

President, Save Everyone's Access (SEA)

December 21, 2014

Dear Ms. Herrmann,

Please find below additional scoping comments re the City's EPA Clean Water Act waiver.

#### ALTERNATIVES' STUDY

Slides presented in the City of San Diego NOP meetings show that currently, San Diego drinking water supply is contaminated by upstream municipal dischargers into the canal from Northern California and the Colorado River.

The proposed \$3.5B "Pure Water" project would treat but a minority portion of the city's total supply on completion.

What are cost and infrastructure comparisons of treating part or all of the current reservoir-sourced drinking water with the reverse-osmosis, ozone, UV or peroxide technology the Orange County plant employs to remove or neutralize prescription and over the counter drugs, estrogen compound disruptors, pesticides, fertilizers, urban runoff, and industrial chemicals?

What are cost savings per gallon of treating raw sewage compared with reservoir water?

To what extent in this process does the North County gray water plant already treat input source?

What are European Union, Chinese, Indonesian, Japanese, Australian, or Middle Eastern new technologies to a. source drinking water or b. treat both sewage and potable water?

#### DESALINATION ALTERNATIVE SUPPLY

What percent of SD drinking water supply will the project provide as of 2035? 2050?

What is the amount San Diego currently receives of Colorado River and No. California canal water?

What are the projected amounts of desalination plants proposed for Carlsbad, Camp Pendleton, Oceanside, and Rosarito Beach. Does Poseidon or any other desal developer plan other regional desal plants?

#### STATE OF CALIFORNIA WATER PROJECTS

What increase in Northern CA potable water will Gov. Brown's \$60B delta project provide for San Diego?

ORANGE COUNTY Does Orange County California treat it's sewage discharge to secondary standards?

PACIFIC OCEAN IMPACTS WHAT ARE THE LEGAL AND OCEAN IMPACT IMPLICATIONS OF THE PROJECT'S PERMANENT EPA WAIVER — GRANTING CITY OF SAN DIEGO LEGAL IMMUNITY AS PLANT OWNER/ DISCHARGER VIS A VIS NEW SCIENCE, HUMAN VIRAL EPIDEMICS, PROJECT SYSTEM FAILURE, EARTHQUAKE DAMAGE, PLANT OR PIPE SABOTAGE, MARINE SPECIES COLLAPSE, OR OVER FISHING?

What other cities U.S. have current waivers to secondary or tertiary treatment?

What other cities U.S. have been granted EPA regulator permanent municipal discharger waivers?

#### INDIRECT VS. DIRECT POTABLE REUSE

What is the human sensitive receptor exposure rationale of the current recycled water practice to blend treated sewage with reservoir water prior to human consumption?

What other U.S. cities now employ DPR for residents' drinking water?

#### HUMAN SENSITIVE RECEPTOR RISK DUE TO EXPOSURE TO MUNICIPAL DRINKING WATER SUPPLIES

Using the Medical lists of pharmaceutical and household drugs, for which of these is San Diego drinking water and outfall product treated?

Re these drugs, for which has EPA designated Maximum Contamination Levels (MCLs) for both drinking water and municipal ocean discharge?

[http://files.medi-cal.ca.gov/pubsdoco/manual/man\\_query.asp?](http://files.medi-cal.ca.gov/pubsdoco/manual/man_query.asp?wSearch=(%23filename+drugscdl*.doc+OR+%23filename+drugscdl*.zip)&wFLogo=Contract+Drugs+List&wFLogoH=52&wFLogoW=516&wAlt=Contract+Drugs+List&wPath=N)

[wSearch=\(%23filename+drugscdl\\*.doc+OR+%23filename+drugscdl\\*.zip\)&wFLogo=Contract+Drugs+List&wFLogoH=52&wFLogoW=516&wAlt=Contract+Drugs+List&wPath=N](http://files.medi-cal.ca.gov/pubsdoco/manual/man_query.asp?wSearch=(%23filename+drugscdl*.doc+OR+%23filename+drugscdl*.zip)&wFLogo=Contract+Drugs+List&wFLogoH=52&wFLogoW=516&wAlt=Contract+Drugs+List&wPath=N)

#### PACIFIC OCEAN IMPACTS FROM STORM WATER, URBAN RUNOFF

From 2015 to 2050 under project protocols, what is City of San Diego treatment for urban storm water runoff that flows in the storm water system to the Pt. Loma sewage plant?



What percent of storm water event discharge is treated by the city? What quantity of storm water is discharged from plants during major rain episodes?

Provide the list of any and all prescription drugs, over the counter drugs, personal care products, viruses, bacterias, chlorines, pesticides, fertilizers, industrial chemicals, heavy metals, and radioactives tested for at the Pt. Loma or South Bay plants prior to ocean discharge?

For this same listing of "additives", which of these contaminants of potential concern are tested for by the City prior to introduction to the drinking and bathing water supply directly accessed by residents?

Re the above listings re human consumption and exposure, and marine environment effluent, cite those for which EPA or other regulator exposure/levels standards exist.

Does storm water event runoff accepted by Pt. Loma or So. Bay in any way effect current primary treatment of raw sewage?

#### SAN DIEGO'S BINATIONAL REGION

Do offshore currents head north from Mexico? Is there science that offshore currents head inward toward swimming and surfing beaches and bay inlets subject to strong tidal flushing action?

Using NOAA and NMFS marine biology and fish count data, what regional marine species have gone extinct such as bass, abalone, bay ghost shrimp, bay razor clams?

Provide historic die off data re San Diego regional species like sea stars.

Provide charts of catch/population counts of Pacific Ocean forage species over time.

What percentage of Tijuana, Mexico's cross border sewage is treated and to what standard? What are the totals of treated and untreated municipal discharge from that city in gallons?

What are the projected population increases of San Diego and Tijuana by 2050 due to infill development promoted by project backers?

What amount is gpd and gallons per year of sewage treated to secondary standards will be discharged under the proposal in 2035 from both Pt. Loma and So. Bay? 2050, in light of population density increases?

#### DISCHARGE ALTERNATIVES

Describe environmental impacts of ocean acidification, eutrophication, warming, and nitrogen loading.

What amounts of chlorine-based chemicals like chloramine added to San Diego outfall discharges? List same for all chemical additives.

What is the status of Surfrider Florida chapter's effort to close six municipal outfalls. Are the Mission Valley or San Diego aquifers considered contaminated beyond potential human use?

List areas in the world where reefs are endangered by sewage discharge. What science demanded all major cities U.S. treat sewage to secondary standards?

Scott Andrews

December 21, 2015

Dear Ms. Herrmann,

Please find this a request to extend the EIR scoping comment period re the City of San Diego's proposed Pure Water Program and alternatives.

We request the comment period be extended 45 days, until February 8, 2015. Given the vacation and/or peak travel activities of the year end and

new year, this is the requisite time for the parties listed below to receive, distribute or agendize at a board meeting, and provide NOP comments.

The reasons for this request: inadequate notification of parties of interest, compression of the two NOP public meetings two days apart - with

apparently no media release or newspaper articles.

Please add these parties to the City notification list:

Liberty Station HOA  
San Diego Fishermen's Working Group  
San Diego Oceans Foundation  
UCSD Surf Club  
USD Surf Team  
SeaWorld/Hubbs Institute  
350.org  
Southern California Marine Protected Areas  
San Diego Surfrider Chapter  
Windansea Surf Club  
Pacific Beach Surf Club  
The Green Store  
La Jolla Shores Surfing Association  
San Diego Surf Ladies  
California Lobster and Trap Fisherman's Assn.  
Parties commenting on the last waiver in 2009  
Swami's Surfing Association  
Sunset Cliffs Surfing Association  
Coronado Surfing Association  
ZLAC  
San Diego County marine recreation, sportfishing, and  
touring businesses  
Mission Bay Aquatic Center  
OMBAC  
San Diego kayak, paddle board, and diving clubs  
California national headquarters Sierra Club  
California national headquarters Surfrider Foundation  
California Waterkeeper Alliance  
Heal the Bay

Wildcoast  
Food & Water Watch  
Sea Shepherd Conservation Society  
Nature Conservancy  
San Diego Convention and Visitors Bureau  
PETA  
NRDC  
Greenpeace  
The Ocean Conservancy  
Center for Biological Diversity  
Oceana  
Pew Institute for Ocean Science  
Scripps Institution of Oceanography  
San Diego Rowing Club

Further, SEA requests the applicant update the current  
DISTRIBUTION list, and relay the final list to all interested parties by email.

Thank you for your prompt consideration,

Scott Andrews  
President, Save Everyone's Access (SEA)

## **SCOPING MEETING**

### **Preparation of a Program Environmental Impact Report**

#### **PURE WATER SAN DIEGO PROGRAM**

**December 9, 2014, South Bay Recreation Center**

**1885 Coronado Avenue, San Diego, CA 92154**

HERRMANN: Good evening, everyone. Thank you for coming to the environmental impact report public meeting for the Pure Water San Diego Project. My name is Myra Herrmann. I am a senior environmental planner in the City of San Diego's Planning Department. These meetings are referred to as EIR scoping meetings and are for the purpose of helping to define the scope of work for the EIR. This meeting is required by the California Environmental Quality Acts for the projects which may have statewide, regional or area-wide environmental impacts. The City's environmental review staff that this project meets this threshold and thereby scheduled this meeting to gather public input prior to the preparation of the project's environmental documents. Environmental review staff are required by the City's Municipal Code to provide the public and decision makers with independently prepared environmental documents which disclose impacts to the physical environment. This information is used by decision makers as part of the deliberative process in approving or denying a project. The environmental document does not recommend approval or denial but is provided as information on the environmental impacts of a project. I am going to go through a few comments about how we'll be conducting the meeting this evening. First, I am going to provide a brief description of the project followed by a short presentation by the applicant and the consultant. At the end of the meeting if there is time permitting – which I think there probably will be – the public is welcome to review any materials provided by Staff and their consultants and ask any additional questions for clarification; however, those comments will not become part of the scoping meeting of record because the meeting will have already been closed. This meeting is designed to get as much public input on areas that need to be addressed in the EIR in the time allotted. Therefore, each speaker is asked to introduce themselves, state their address and complete their comments within three minutes. This entire meeting, if we have a lot of people, would last approximately two hours and would end at 7:30. If after the people who are here who comment have no more

comments and there is no one else left we will end the meeting early. In addition to verbal comments which are being taped for the record, there are forms available on the table over there from the City upon which you can provide written comments. We will need to have these comment forms submitted to City Staff by the close of the meeting or you can mail the completed form with your comments to the address listed on the back page. It is a threefold sheet of paper, two sided, so all you have to do is put a stamp on it and you can mail it directly to me. Please remember to put your name and address on the sign in sheet before you leave the meeting if you would like to receive the notice of availability for the draft EIR. And if you have an email address go ahead and put that on in place of your street address because we can email the public notice which will have a link to the EIR for later. Please refrain from conducting a debate on the merits at the project at this meeting as this is not the purpose for tonight's gathering. Rather, please focus your comments on those environmental impacts you would like thoroughly analyzed in the project's environmental document. Lastly, I will be acting as the moderator and timekeeper for the duration of the meeting and therefore would respectfully request that you yield when notified that your three minutes are up. Thank you for your patience and we'll begin with the project description and then a brief presentation by the applicant. This meeting is being conducted in accordance with CEQA for the pure water program. It's Tuesday, December 9, 2014. It's a little after 5:45. The project description is the Pure Water Program which is being proposed by the City of San Diego Public Utility Department to provide a safe, secure and sustainable local drinking water supply for San Diego. Advanced water purification technology will be used to produce potable water from recycled water. The pure water program consists of the design and construction of new advanced water treatment facilities, wastewater treatment facilities, pump stations, transmission lines and pipelines. The City and its regional partners face significant issues with water supply and wastewater treatment. Water is critical to the health, safety and quality of life of people living in the San Diego region. Currently 85% of the region's water supply is imported. The region's reliance on imported water causes our water supply to be vulnerable to impacts from shortages and susceptible to price increases beyond our control. As sources of local water supply are few, we have explored non-potable and potable reuse options of treated water. Water reuse is proven safe and reliable and is currently in use in other communities in the United States and around the world. A decision must be made regarding the future treatment process of the City's Point Loma Wastewater Treatment Plant. The plant

operates with a Clean Water Act Section 301H modified NPDES permit which allows the City to operate without full secondary treatment. The current modified permit expires on July 30, 2015. PUD is in the process of submitting a new permit application and working with The Environmental Protection Agency as well as with local environmental groups to gain legislative or administrative approval for the concept of secondary equivalency within the Clean Water Act. A plan to meet modified treatment standards that would be the same as if the existing 240 million gallon per day Point Loma Water Treatment Plant were converted to secondary treatment standards. The Pure Water Program is a significant water and wastewater capital improvement program that will create up to 83 million gallons per day of locally controlled water and reduce flows to the Point Loma Water Treatment Plant which would reduce total suspended solids discharged and recycle a valuable and limited resource that is currently discharged to the ocean. The Pure Water Program is a 20 year program that will involve the planning, design and construction of new advanced water treatment facilities, wastewater treatment facilities, pump stations and pipelines. The Pure Water Program will also include property and easement acquisitions, discretionary permitting, property acquisition, financing, facility start up, testing, operation and maintenance of new facilities and significant public education and community engagement. With that, I am going to turn over the microphone to the Public Utilities Department Staff and they'll give a brief presentation.

MALE: Good afternoon, everyone. My name is Amer Barhoumi. I've been working on the Pure Water Program since 2009. Prior to that I was working for Public Utilities and I worked on the master plan for [inaudible]. I'm going to give you a little bit of background on the Public Utilities and what we do. Public Utilities operates around 130 pump stations; 50 of them are on the water side and 80 on the wastewater side. We also operate three treatment plans, the Point Loma Wastewater Treatment Plant, North City and the South Bay and we also operate solid waste processing facility in [inaudible]. We also provide services to the eighth largest city; that's the City of San Diego, of course, and we provide services to 1.3 million individuals basically on the water side and 2.5 million on the wastewater side. We also have 15 participating agencies, all the way from Chula Vista to Del Mar and Poway. We are regulated by the United States Environmental Protection Agency and also by the State Resource Control Board. We have about \$1 billion invested over the last few years and we have \$412 million planned capital projects in the next two years. We purchase water, basically the cost that we have about \$290 million and

that's tied into fixed costs and also costs related to the purchase of water. We like to show this figure here because we import about 85% of our water from the Bay Delta area and then from Colorado area. And we are right down at the bottom, at the end of the pipeline here. So you can imagine anything that happens that would disrupt the water basically we'll be affected quite a bit. Also this figure shows – you see those spots right here, the purple, red and orange spots? Those are discharges, wastewater discharges, treated wastewater discharges that actually discharge to the, to the Colorado River and also here in the Bay Delta. So essentially what we're getting already recycled water that has been recycled over and over again. What is being done on the regional level? We have water conservation that's currently being done and we also have the desalination. You're all familiar with the Carlsbad desal plant and there are other plants I guess being proposed also somewhere in Camp Pendleton. On the City side, we also have water conservation, we have ground development, although ground development we don't anticipate it to be a major impact as the aquifers are very – they don't handle large amounts of water. And on the recycled water, we have projected about 18 MGD by 2035. That's going to be recycled water, basically, the purple pipe. And on the potable reuse we're doing the 83 MGD potable reuse and Pure Water Program basically. So what is Pure Water San Diego? It's a 20 year program to provide safe and reliable water for San Diego and it's basically uninterruptable water source. It's a proven technology that has been implemented elsewhere. For instance it's been implemented in Singapore, in Virginia and also in Orange County. And it provides again, like I mentioned, locally controlled drought proof water supply. And the fourth bullet here is very important because it eliminates the need for upgrading to Point Loma and it saves quite a bit of money. You can save anywhere from \$1.8 to \$2.1 billion in the upgrade of Point Loma if we implement pure water because we're diverting wastewater away from the Point Loma Plant. And basically this schematic shows how the Pure Water Program is going to work. Wastewater will come into the water reclamation plant. You'll have Title 22 reclaimed water. It'll go into the purified water, basically MF or UF and reverse osmosis and then UV and advanced oxidation. And you'll have the, basically the pure water coming out and it'll be going into the reservoir. Now part of the pure water would be going to be blended with the recycled water so we can reduce the total dissolved solids on the recycled water side. And after the reservoir, the plant, the water will go into the water treatment plant. It will go to standard treatment at the water plant. And this is basically the treatment process. You have the Title 22 water coming into the MFUF



which is down here and then you'll have the reverse osmosis which is down here. They come in [inaudible] and also you have the UV advanced oxidation which is right showing in here. And then it'll go into the San Vicente Reservoir and then into the water treatment plant and then drinking water supply. So in 2009, we started the demonstration project. It's a 1 million gallon per day demonstration project and the plant has been operating since 2009. And it's been producing pure water basically that we've been utilizing to blend for the recycled water we're at now. It's not being utilized for anything else; it's just [inaudible]. And we have conducted about 9,000 lab tests on that pure water and it basically meets all the drinking water standards. And we have again exceptional water quality comparable to distilled water. And the energy also is very comparable to imported water. We looked at that and I think it turned out, it's 2,300 kilowatt hours for importing one MGD so it's very comparable. And that's the demonstration, the project report that we have done and it's available online for you to go ahead and look at it at the City website. Also as we're doing the demonstration project, we had an independent advisory panel verify all the results so all the results that we've had, all the testing that we've done was looked at by ten individuals that you see on here and most of them are PhDs and professors and they pretty much approved all the work we have done. Next. And again as I mentioned before, other cities are doing it. We have Orange County. They have been operating since 2008. They have about 70 to 100 MGD now, ground water recharge. And also Fairfax, I think it's 30 MGD and they've been doing it since 1978. And I also mentioned Singapore that have been doing it also for a while. So we're not the first city to do it. It has been done elsewhere. And we've had tentative approval from these two agencies basically on the demonstration project. We have, on September 12, 2012, we have the California Department of Public Health. They approved our reservoir augmentation concept and also the Regional Board also approved it on February 12, 2013. Basically what the program is, we have a first phase which is a 15 MGD which will be at North City and you will see the pipeline going to San Vicente. You see other items on this map, other pipelines but these pipelines are different alternatives that we are looking at, increasing capacity at North City and so forth and increasing the 15 – basically it'll be anywhere between 27 to 30 MGD going from North City to San Vicente. And then we have the Harbor Drive plan. It could be anywhere between 41 and 53 MGD and it'll also be growing to San Vicente. Then we have the South Bay plan and we have another sewer pump station there, we'll be pumping sewer back south. As I mentioned earlier, the size of this facility is too influx right now. We're trying

to figure out how to minimize flow to South Bay and whatever we divert we're going to try and hopefully consume and not let it go out of the outflow. So the total from all three facilities is 83 MGD, even though what I was telling you, we will expand. There's a possibility North City will be 30 MGD. So if this is 30 then Harbor Drive will be reduced. Okay, so the total will be 83 MGD regardless of what the capacity of each plant is.

MALE: 83 pure?

MALE: 83 pure water, yes. and we can skip this one; we've already been through it. And this figure here, we put it together just to show you that it's cost effective to do a pure water program. The red one reflects the secondary at Point Loma plus the imported water costs and then this here represents the pure water costs plus imported water costs so you can see there's \$250 million savings in here. So if you don't mind pressing one more. So who supports the pure water? As you all know it's been supported by the City Council. There were several resolutions, one on the recycled water study done in July of 2012 and then we had the resolution also on April 29, 2014 supporting the Pure Water Program. All the environmental groups from the Coast Keepers, Surfriders, Audubon Society, all the wastewater participating agencies and Scott is here representing them; and all the professional engineering communities, also, and the Water Reliability Coalition; and of course the Independent Rate Oversight Committee which were present at all the recycled water studies that we have done in 2009 to 2012. And basically this is all the supporting agencies and groups. And what can you do? I guess you can visit the Pure Water San Diego.org program. You can sign up for tours. And you can join our mailing list; I guess we can go ahead and take your name and send you whatever information you need. And that's it.

HERRMANN: Okay, so, at this point in the meeting, we're going to open up to public comment. And because we have a small mic, you're going to actually have come up here. So we don't have a podium. You'll have to come up to the table here and talk as clearly as you can into the mic. State your name and your address for the record and then make your comment. Three minutes. There's not a large crowd here so if you need to go over three minutes that's not a problem for me. That's perfectly fine and we'll go ahead and if there's anybody who wants to make any comments on the record just go ahead and raise your hand. Okay. I'll move the mic up here.

MALE: My name is Joel Young. I live at 2145 Mitscher Lane, San Diego 92106. That's in Liberty Station. I guess my concern about this is rationale for building the pumping station, I guess, or purification plant on Harbor Drive. It seems like a very high value area to be using for that purpose. I have no personal objections to the concept of the project but I'm just wondering what the rationale is for using very high value coastal property for that particular purpose.

HERRMANN: Thank you. Whoever raised their hand next, go ahead and come up to the mic.

MALE: Scott Andrews, I'm going to go fast so we get this on the record. As the application is federal, we request the joint CEQA and NEPA study. We'd like the results published in English, Spanish and Tagalog. We want the notice – I saw a notice in the paper of these two meetings so, you know, this is a huge issue so why small articles in the paper to notice. I'm sure the UT would go along. We request the study reveal the basis for the population projections. I'm going to submit these questions to you just so you know, if you're trying to take notes. We'd like you to compare SANDAG's infinite growth model to alternate growth projections based on sustainable population. We'd like to see a plan that's consistent with state and federal carbon capping that may come online at the federal level and is already somewhat at the level – I'm sorry, operative at the state level. We ask that you study phasing of water quality improvements under core mean impacts as compared with the nonchemical options like ozone peroxide, [inaudible], reverse osmosis, UV exposure, and new secondary, the new techniques that may be available in Europe and China. Again, we'd like publicly noticed in a timely fashion any stakeholder meetings or nonpublic employee insider working groups. Alternatives should factor in use of gray water and other techniques called for by the San Diego City Council at their prior unanimous vote. Financing. We'd like you to look at and reveal water rate increases projected to close funding gaps; we'll get to the rationale for that in a sec. At the current and projected deficit financing and reveal common cost overruns on projects of this magnitude; we'll get that in a second as well. They are to be expected. We'd like to get – for the record since it looks like the grand funding is anticipated as being a big part of the financing, we'd like the speculative grant sources revealed. I'd like to include the cost of relocating the Liberty Station police and fire training facility and my last one written down here – I may take two more minutes if I may – quantify alternative source water, drinkable supply from things that are either online or

going to be online and are much less speculative than this project at this moment. Governor Brown \$60 million Southern California Water Delivery Project, the price on that three weeks ago went from \$25 million to \$60 billion – I’m sorry, billion to billion – \$25 billion to \$60 billion. Like you to look at the desalination plants as was mentioned for this region and as we understand it, by our research, they’re now proposed at Camp Pendleton, Oceanside, Carlsbad and Rosarito. Carlsbad projected 50 million; Rosarito 150 million to serve San Diego as well as Mexico. Pendleton, 150 million; Oceanside, I have no idea. My final remarks are, it occurs to me that – because I have learned that ocean discharge today increases. Now I’m told it’s 140 million. I know you’re capacity is 240 but I’d like to know what the true amount is because five years ago when you got the waiver we were talking 108. Now they claim 140 per day actual. So we’d like that verified so we have some baseline here we can work with. Secondly, I’ve learned that in 2050, the amount of undertreated secondary discharge returns to 2015 levels out of Point Loma and South Bay total. That’s from your own consultant so we’d like that looked at because that’s no net gain for the ocean. Just as a final note, pretending that the cumulative impacts of 50 billion gallons a year of any treated discharge, industrial discharge to the ocean has no impacts is ridiculous and we’ll see you in court about that. We want an honest look at that. Florida Surfrider has successfully lobbied to close six outfalls to close them. Why? To save the damage to sensitive receptors and reefs. So why no impact here? And that’s what Scripps argued five years ago, no impact here, no big difference between secondary and primary, for instance. Interesting claims. Lastly, there’s one other group of sensitive receptors and that’s the people who drink from that wonderful map you just had up there. Pretty disgusting. And not treated by any of these modalities. So our question is, since you’re providing after \$3.5 to \$4 billion still a minority, as I understand it, of our total drinkable, what are we to do? Are we susceptible as sensitive receptors forever to that undertreated su-, drinking water and is the ocean susceptible to all the illegal toxic dumping, the fertilizers, the urban runoff, the endocrine disrupter compounds, etc., etc.

HERRMANN: Is there anyone else who would like to speak on the record right now?

MALE: Thank you. My name is Ed Sprigs. I live at 1442 Seacoast Drive, Imperial Beach and I’m a member of the City Council, City of Imperial Beach and the Commissioner on the Metro Wastewater Joint Powers and Authority. I speak here not representing my commission

role on Metro JPA but rather as a City Councilman for the City of Imperial Beach. The City of Imperial Beach passed a resolution as was eluded earlier along with other participating agencies in support of pure water in principle. However, the City of Imperial Beach has unique considerations because it's a beach town very close to the South Bay Ocean Outfall which is impacted by – potentially impacted by the Pure Water Program. It's impacted because the whole principal of offloading Point Loma is to enable secondary equivalency and part of that offloading involves conversation of wastewater going to Point Loma to pure water and some of that is going to be in the South Bay. The question is, how much of that diversion of additional wastewater to the South Bay is going to result in increased South Bay Ocean Outfall flows, even if secondarily treated? This is something that affects the City of Imperial Beach because we have already, over many years, have struggled to overcome the impression of the ocean environment not being the best because of flows from Tijuana and Mexico and flows from the Tijuana River. To see pure water result in any increase in flows out of the South Bay Ocean Outfall given this history would be the ultimate of irony that we are reducing Point Loma but increasing the South Bay in this environmental where we're trying to work with Mexico and trying to work with the Tijuana River Valley to reduce the total amount of pollution in that part of San Diego. So pure water has to result in reductions everywhere, not just Point Loma. Otherwise, we're shifting the burden to the South Bay and that is something that the City Council of Imperial Beach has objected to in the wording of its resolution. So those are my comments and we will be following this issue very closely. We hope that new technologies will take into consideration and reduce the amount of discharge necessary to be moved to the South Bay. We hope that the South Bay Ocean Outfall which flows nearer to the shore than the Point Loma and in much shallower water will not be impacted and we hope that as a contingency as we've discussed with the City of San Diego, there will be studies, updated studies regarding the plume that now exists from the South Bay Ocean Outfall and how it could be – and modeling it for any potential increases and what the impact will be on the shoreline and the near shore marine environment. So these studies should be part of any diversion that could result in any possible increase in the South Bay Ocean Outfall. Those are my comments. Thank you.

HERRMANN:           Thank you. Is there anybody else who would like to speak right now on the record? No. If not and nobody objects, I will just stop the meeting temporarily for about ten minutes just in case anybody decides they want to speak and then we can either close the

meeting or continue. You can go ahead and turn the mic off. It is about 6:18 right now and we'll restart in about ten minutes.

[Break]

HERRMANN: Okay, this is Myra Herrmann with the City of San Diego again. We just went ahead and reopened the meeting after a brief break and we're going to accept any additional comments for the scoping. If there's anybody in the public that would like to speak again before we close the meeting.

MALE: [Inaudible]. I just wanted to second what Mr. Sprague had to say.

HERRMANN: State your name really quickly.

MALE: Scott Andrews. Just wanted to restate what Mr. Sprague spoke to which is this area has double loading of undertreated ocean discharge from two major cities. And the northerly currents bring that water to San Diego beaches and Imperial beaches and the impaired water body of San Diego Bay. So I love Mr. Sprague's idea about computer modeling of these amounts. And I also want a timeline computer modeling showing that the San Diego discharge returns at minimum to the same levels of today after \$4 billion are spent.

HERRMANN: Thank you for those additional comments. Is there anybody else before I go ahead and close the meeting?

MALE: [Inaudible].

HERRMANN: Okay.

MALE: Ed Springs. And that additional comment is, it's, Imperial Beach is often forgotten because it's so small but here we have a community that is really improving compared to the way it was 30 years ago. It has struggled mightily to become a tourist attraction with a new hotel and restaurants and a tourism and ecotourism economy that's beginning to build now and the possibility of a second oceanfront hotel very realistic in Imperial Beach. We cannot continue to be regarded by San Diego and the County as the armpit of the County for any purposes including the calculations and the infrastructure regarding wastewater treatment. We are a major tourism attraction, attractor now. We need to be treated exactly the same way as San Diego and

Coronado when it comes to considering the environmental impacts of these infrastructure investments. I've just been reelected; I'll be in office another four years. We have a new mayor who's very environmentally oriented. We're going to hear from us if we feel we are not being treated as an equal in the tourism and ecotourism industry in San Diego. And the way our environmental approach is taken regarding clean water, etc., is a vital element of this. So I just wanted to make that point because that's only fair. Thank you very much.

HERRMANN:        Okay, thank you very much for those additional comments. Seeing that there's no other members of the public that want to speak to the item, I'm going to go ahead and close this meeting and make a few closing remarks. This closes the public environmental scoping meeting for the Pure Water San Diego Program. Your input will be transcribed, considered by City Staff for use in the scope of the EIR and included as part of the official record for the document. Speakers and commenters will also be placed on the notification list for further environmental review actions related to this project so if you haven't put your name on the sign in sheet please do so before you leave. I would also like to remind everyone that this is just the start of the environmental review process and opportunities for public input. There will be other opportunities to provide comments on the project such as during public review of the draft environmental document and in any further public hearings on the project. Thank you for taking the time to participate in the meeting and have a great evening. Thank you.



## **SCOPING MEETING**

### **Preparation of a Program Environmental Impact Report**

#### **PURE WATER SAN DIEGO PROGRAM**

**December 11, 2014, Metropolitan Operations Complex**

**9192 Topaz Way, San Diego, CA 92123**

HERRMANN: Good evening, everyone. Thank you for coming to the environmental impact report public meeting for the Pure Water San Diego Project. My name is Myra Herrmann, senior environmental planner for the City of San Diego's Planning Department. These meetings are referred to as EIR scoping meetings and are for the purpose of helping to define the scope of work for the EIR for the project. This meeting is required by the California Environmental Quality Act for projects which may have statewide, regional or area-wide environmental impacts. The City's environmental review staff has determined that this project meets this threshold and thereby scheduled this meeting to gather public input prior to the preparation of the project's environmental document being released for public review. Environmental review staff are required by the City's Municipal Code to provide the public and decision makers with independently prepared environmental documents which disclose impacts to the physical environment. This information is used by decision makers as part of the deliberative process in approving or denying a project. The environmental document does not recommend approval or denial but is provided as information on the environmental impacts of a project. Now I am just going to provide a few comments about how the meeting is to be conducted. First, I'll provide a brief description of the project followed by a short presentation by Public Utilities Department Staff. At the end of the meeting with time permitting, the public is welcome to review any materials provided by Staff and ask additional questions for clarification; however, these will not become part of the scoping meeting record. This meeting is designed to get as much public input on areas that need to be addressed in the EIR in the time allotted for this meeting. Therefore, each speaker is asked to introduce themselves, state their address and complete their comments within three minutes. This entire meeting will last two hours unless nobody wants to speak after a certain amount of time and then we'll either end the meeting at 8 o'clock or beforehand, just depending on the number of public we have. In addition to verbal comments which are being

taped for the record, there are forms on the table that are available upon which you can provide written comments. We will need to have these comment forms submitted to Staff by the close of the meeting or you can mail the completed form with your comments to the address listed on the back page. It is a trifold form so all you have to do is put a stamp on it. Just make sure your name and address or your email address are clearly written on that form so that we can provide you any information with the draft. Please remember to put your name and address on the sign in sheet before you leave the meeting if you would like to receive notice of availability for the draft EIR. You can also put your email address on that sign in sheet as well. Please refrain from conducting a debate on the merits at the project at this meeting. This is not the purpose for tonight's gathering. Rather, please focus your comments on those environmental impacts you would like thoroughly analyzed in the project's environmental document. Lastly, I will be acting as the moderator and timekeeper for the duration of the meeting and therefore would respectfully request that you yield when notified that your three minutes are up. Thank you for your patience and we'll now begin with the project description and then a brief presentation again by Public Utilities Department Staff. This meeting is being conducted in accordance with CEQA for the Pure Water Program on Thursday, December 11, 2014, and we began the meeting at 6:15. The Pure Water Program is the City of San Diego Public Utilities Department program to provide a safe, secure and sustainable local drinking water supply for San Diego. Advanced water purification technology will be used to produce potable water from recycled water. The pure water program consists of the design and construction of new advanced water treatment facilities, waste water treatment facilities, pump stations, transmission lines and pipelines. The City of San Diego and its regional partners face significant issues with water supply and waste water treatment. Water is critical to the health, safety and quality of life of people living in the San Diego region. Currently 85% of the region's water supply is imported. The region's reliance on imported water causes our water supply to be vulnerable to impacts from shortages and susceptible to price increases beyond our control. As sources of local water supply are few, we have explored non-potable and potable reuse options of treated water. Water reuse is proven safe reliable and is currently in use in other communities in the United States and around the world. A decision must be made regarding the future treatment process of the City of San Diego's Point Loma Wastewater Treatment Plant. The plant operates with a Clean Water Act Section 301H modified national pollutant elimination discharge system permit which allows the City to

operate without full secondary treatment. The current modified permit expires on July 30, 2015. Public Utilities Department is in the process of submitting a new permit application and working with The Environmental Protection Agency as well as with local environmental groups to gain legislative or administrative approval for the concept of secondary equivalency within the Clean Water Act. A plan to meet modified treatment standards that would be the same as if the existing 240 million gallon per day Point Loma Wastewater Treatment Plant were converted to secondary treatment standards. The Pure Water Program is a significant water and wastewater capital improvement program that will create up to 83 million gallons per day of locally controlled water and reduce flows to the Treatment Plant which would reduce total suspended solids discharged and recycle a valuable and limited resource that is currently discharged to the ocean. The Pure Water Program is a 20 year program that will involve the planning, design and construction of new advanced water treatment facilities, wastewater treatment facilities, pump stations and pipelines. The Pure Water Program will also include property and easement acquisition, discretionary permitting, property acquisition, financing, facility start up, testing, operation and maintenance of new facilities and significant public education and community engagement. At this time, City Staff from Public Utilities Department is going to make a brief presentation about the project.

MALE: Good evening. My name is Anthony Van and I am with the Public Utility Departments. I am here to present the Pure Water San Diego tonight and thank you for giving me this opportunity to provide this information to you. With that I would like to start. So just a quick background of what the Public Utility Department does. We are water and wastewater service provider. We provide up to 1.3 million of San Diegans with the water service and we're also providing up to 2.5 million customer with the wastewater. That includes 15 various agencies. We're heavily regulated by the federal and state agencies as well as the United States Department, Environmental Protection Agency and the State Water Resource Control Board. We are anticipating to – actually we have spent over approximately \$1 billion of construction service in, over the last five years and we're anticipating to also, planning to spend over \$412 million in the construction and maintenance for water and wastewater system. Our biggest cost is the imported water that we're going to be spending. That is over \$209 million which includes construction and maintenance and operation. I'm sorry, I'm going to have to pick up the mic and get closer a little. The slide's a little far away and I just couldn't see the information. If it's okay,

if I can stand right in front of you and just kind of reference with the slides. This map here is basically showing where the majority of imported water comes from. In fact, the City of San Diego imports up to 85% of that water from the Northern California Bay's Delta as well as the Colorado River Basin. And as you can see we are all downstream from everyone else. It takes hundreds of miles a way to import this water to San Diego as well as the amount of energy that's sending down to us. The little triangles, a little far away but the triangles and the squares, the circles represent the various cities and agencies that are putting treated wastewater into the Colorado River Basin as well as the water state projects and that gets delivered to San Diego; so in essence we are already using reused water. So, there are numerous challenges that, a multitude of challenges that the City is facing. Knowing that San Diego has a Mediterranean climate and we're limited with local water supplies here; with the recurring drought conditions; as you're aware the last three or four years, we haven't gotten much rain so that is becoming another challenge. Actually, Governor Brown has declared a state drought this year, early this year. And even the City, in early October we have gone into a level two drought alert which we're asking citizens of San Diego to help us conserve water so that restriction has already been in place. Of course with the population growth we are continuing to face that challenge to provide that additional local supply. Of course with the Endangered Species Act with court decision to protect these Delta Smelt, the little fish that's up in the Northern California Bay Delta, restricts when and how much can be delivered so meaning less water for San Diego. As well as, we are well known with the natural disaster, particularly earthquake in California, Southern California, that's one of the constraint that in case, if that does happen, it could sever a pipeline system which we're actually have to look, pay more attention on the local supplies. Now in the last ten years the rising of import, the cost of importing water has doubled. We're expecting in the next ten years it will continue to rise and as you can see on that graph right there, that's where that little increase in cost there. So what is being done to combat this challenge? Well, regionally we're pursuing the water conservation as well as there is an ocean desal plants currently in construction in Carlsbad. And locally, for seat of San Diego, we are pursuing locally drought control, diverse supply options which will look into water conservation which we have done a good job; our citizens have helped us since 2007 reducing 15% of that usage as well as we're also looking into ground water developments. Of course, our basins here are much, much smaller than what is going, comparing to Orange County but every drop counts. The City is also using

two of our water reclamation plants, one at the North City and one that's South Bay and we're basically using recycled water for irrigation and industrial use such as cooling tower and if you happen to drive up in Torrey Pines somewhere you would see those little – not orange but the purple fire hydrant. That stands for the purple pipe system. But that's – all of these, these are not enough. These efforts are not enough. We've just got to keep looking for that additional source of supply here. So the City is looking for ways to increase our use of recycled water through the water purification technology to produce that safe, reliable water and for this local supply here. So that's where Pure Water San Diego comes into play. What is Pure Water San Diego? It's a 20 year program that will provide a safe, reliable and cost effective drinking water supply for San Diego. It also involves construction planning, design and construction of the advanced water purification facility; pipelines, pump stations, all that piping and pertinence as needed. It's also proven that with the water purification technology it is, the latest of what we have and is environmentally friendly as well as it will provide a locally controlled, drought proof water supply. And it also eliminates the need for expensive upgrades to the Point Loma Wastewater Treatment Plants. The other benefit is that we can depend less on imported water as well as less discharge into the ocean. This schematic is basically showing how the water process works. Basically, wastewater coming from homes and business gets sent into the North City Water Reclamation Plants. From there we treat that water to produce recycled water. From that recycled water is where our demonstration facility started is using that recycled water to purify through three treatment steps using membrane filtration, reverse osmosis as well as the ultraviolet disinfection process. From there, that purified water would get sent into the San Vicente Reservoir augmentation, allowed to blend for a period of time before it gets sent back into our potable drinking treatment plants. We further treat that water to make sure that it's safe and meets all of the regulatory standards before it goes back into the drinking system. The City is also working on exploring the other alternative, what's called the direct potable reuse but it's currently in a research stage so that is to be explored. This slide here shows how the water purification process works. Basically it uses the multi-treatment barrier with the multiple treatment steps to basically take out all the unwanted materials through the three treatment steps which as I have mentioned earlier, the membrane filtration, reverse osmosis and the UV light with hydrogen peroxide. Okay. Here we go. So as I mentioned earlier, Pure Water San Diego, actually a demonstration project has successfully proven that the technology that we're using is

safe and reliable and it met all the regulatory standards. In fact, between 2009 and 2013 is where the demonstration – we conducted the demonstration project and through that 1 million gallons per day demonstration facility that's currently located up at the North City Plants, we have done extensive testing at this demonstration facility which helped us gather information and data that would prove that it is safe and it meets all state and federal regulatory standards. So the water that's produced at this facility has been shown exceptionally high quality and it's comparable to the still water. Of course as part of that study we have also looked at the energy use in comparing to the imported water and it is very cost effective. So with all the information and data we have gathered through the demonstration project we have concluded with a final project report. In March 2013 we submitted the report to City Council and on April 23 the Council unanimously adopted the report. Through working on the demonstration project, we have convened a group of independent advisory panel who are onboard to help guide us through, with the research of the demonstration project as well as providing expert peer review of the work that we've been doing. This is the group of ten IEP which we have host, actually ten independent advisory panels in the past four years and they have unanimously supported our demonstration project. The advanced water purification technology is also used from other cities such as the Orange County Ground Water Replenishments. They have been operating the facility since 2008 and in fact they have just completed – they are working to expand their 70 million gallons per day to 100 million gallons per day using the same technology that we're using here through the three treatment steps. So on the other side is Fairfax County of Virginia who's also using recycled water to supplement for their drinking water in an open lake reservoir where they have also initiated originally the 10 million gallons per day. Later on they have increased it to 34 MGD and they recently completed construction, has expanded up to 54 million gallons per day. So as you can see it's proven that this technology works and it's a blessing to see that happening here, too. So as I mentioned earlier, we have worked very closely with the Department of Public Health who are now called Division of Drinking Water as well as the Regional Water Quality Control Board through the demonstration project. We have engaged the regulators in all of our independent advisory panel meetings. They have heard and seen what we have received in terms of the results of the demonstration project. And on September 7, the California Department of Public Health approved our San Vicente Reservoir augmentation concept as well as the Regional Board who sent us a letter in support of our project back in 2013. So what we're doing now is we're moving

forward with the Pure Water Program which consists of the two phases. The initial phase is by 2023 where we'll be constructing a facility to produce up to 15 million gallons per day of that purified water which will get sent to San Vicente Reservoir. In 2035, we are looking to maximize it up to 83 million gallons per day of that purified water and that is basically the next slide. The next slide gives a conceptual location of where all our facilities, including advance water treatment facility, the pump stations and pipelines that's conveying the pure water, the purified water to San Vicente Reservoir. And that's the pipe alignment right there. And also one is coming from the North Harbor Drive paralleling the I-8 into the San Vicente Reservoir. This slide here, this diagram shows the total revenue of pure water, what pure water can save if we were to move away – basically taking pure water plus the imported water versus not having to upgrade the secondary plus the import, imported water. Sorry, it's for secondary and imported water. So the cost – the cost, what you're seeing there is that when estimating saving about \$250 million in comparing to if we were to move into secondary and purchasing the increasingly expensive imported water. So who supports our Pure Water Program San Diego? Well, City Council has approved the resolutions back in April of this year for Pure Water Program and as you can see down the list we have environmental groups, wastewater participating agencies, professional engineering community, water reliability coalitions and business groups and even our [iRock] Committee who is strongly supporting this pure water concept because it worked.

MALE: [Inaudible]. Is this going to be a presentation or an [inaudible]? Talking about who supports it, how good it is. I thought we were going to talk about the provisions rather than argue them.

FEMALE: This is the Staff presentation.

MALE: Oh, okay. So this is your sales. Okay, go ahead.

MALE: So, if I may, I'd like to finish up the last slides here. So to learn more about our Pure Water Program you can also visit our website at [purewatersandiego.org](http://purewatersandiego.org) and you can Tweet us. You can go on YouTube and see what we've done so far. Most importantly we have all of our project reports, all of the study that we have done throughout the demonstration project. You can find them all in the [purewatersandiego.org](http://purewatersandiego.org) website where it provides the additional



information and any questions you might have about our project. So with that, I'd like to conclude. Thank you.

HERRMANN: Okay, while we get set up with the other mic, I'm just going to remind everybody about a few, just a few meeting protocols. I'm going to go ahead and invite members of the public up to speak for three minutes and I am keeping time. My phone has a little jingle on it when the time is up so if I see that you're still trying to make a point and you, you know, I'm going to let you go. There's not a lot of people here so we have time but we're not going to – I'm not going to allow people to go on and on and on. But I do want you to get your points made and your comments on the record so that we could use those for the EIR process. So with that, I think the mic is ready and if there's anybody who wants to speak right now feel free to come up to the mic.

MALE: I had two technical questions and they were touched upon by the City Staff person. One was there was going to be a switch from the – there was going to be an ozone hydrogen peroxide purification method. What method do we currently use?

HERRMANN: Just a quick reminder we're not going to be answering questions.

MALE: Oh, there's no dialog.

HERRMANN: Yeah. So if that's a comment that you want to make go ahead and make that and we'll make sure to cover that.

MALE: No, my, my, my comment is, my understanding is that the current method which I think is a chloramine method, has been – we're under some pressure from the EPA to change to the method that Staff has suggested. And my question is, why don't we do that right away? If that's better for us, let's do it right away. The second question, Staff mentioned in their presentation an advisory body that has been meeting and has been appointed. Who are the members of this body and when are the meetings conducted and are they public? Finally, I'm quite interested in receiving – and I've got a formal written request to turn in – receiving the ability to inspect under public records all the contracts, agreements and correspondence concerning this project and program. I'm interested in how much money has been spent to date and how much money has now been contracted for. Finally, if there is any for-, if during your

study you use any estimates, let's say of water usage, population growth, cost, any estimates of any formulas or numbers, I'd like the study to provide the basis and the calculations for those studies. So if there's a – let's say if we're estimating there's going to be a population growth, what's the basis for that? Is it United States Census or is it some number that SANDAG gave us? And if it was census, okay; those are raw data. But if it's a calculation that we're taking from some other source, please provide the basis for those calculations and estimates. Thank you and I think you've done a great job. And my name's John Stump.

MALE: Hi, Scott Andrews. I'd like to see included in the study the environmental impacts of sewage discharge and I'd like you to look worldwide for that data. Specific-, one example would be reef destruction. I know Surfrider in Florida acted in their closing six outfalls. That would be one example. I would also like phenomenon like die offs, like the current California sea star die off, I'd like the addressed as to possible causes. Next and final is standards. I request thousands of chemicals, pharmaceutical drugs, industrial toxins, pesticides, herbicides, personal care products and I hope I said pharmaceutical drugs, household drugs, if you will; I would like those to be listed and those that do have standards for MCL or MCD, I'd like the applicable results. In other words, if they are, if they do have those standards, I'd like that cited. If they lack those standards, more importantly, which of all of these listed that are commonly used in the United States do not in fact have standards? And I want to be listed as well. You guys continually trumpet that your testing meets all standards so I want to test the amount of standards that actually exist. Thank you.

MALE: Good evening. My name's Al Lau, I'm the director of engineering for Padre Dam Municipal Water District. I'm just making a comment that Padre Dam Municipal Water District, along with out agencies in East County is planning a similar project in East County which in effect could offload up to 20 million gallons per day wastewater from Point Loma. So as part of the program EIR process, I think you guys should include at least the implication of that off flow, how's that going to impact your program. Obviously for every gallon that we off flow in East County that's a gallon less that the City of San Diego has to do. In the long run, the less the City of San Diego has to do the less impact potentially you would incur with this program.

MALE: Hi, I'm Jim Peugh. I'm the conservation chair of the San Diego Audubon Society. The San Diego Audubon Society strongly supports this program because of the environmental –

positive environmental impacts of not having to draw water from environmentally sensitive areas like the Bay Delta and the Colorado River. Some of the concerns I have with the document is the description, project description that says up to 83 million gallons per day but in the cooperative agreement with the environmental organizations I don't think it says up to 83 million gallons per day; I think it says specifically 83 million gallons per day. So I hope that those two documents can be consistent. You know, we've been told that 83 million gallons is the number that will bring us so we can claim secondary equivalent and I'd like to make sure that that actually happens. As far as water quality, I hope – there are so many positive water quality benefits to this program. I hope that the document is really good about specifying what those are so that erroneous arguments won't come up. One of the possibilities would be eliminating the potential need for discharging partially treated sewage into San Clemente Canyon during huge rains. That's a positive environmental impact. As far as water quality, I hope that the document does a good job of analyzing what happens to the brine and what the implication or what the impacts of that will be. As far as greenhouse gasses, I hope that the EIR will address the methane impacts as well as the carbon dioxide impacts and one would think for at least carbon dioxide that it would be kind of self-mitigating since it'll take less energy to do an IPR than it will be to pump water from our distant sources here. On alternatives – oh, on health impacts, there was mentioned before that it's important to be specific about what the health impacts of drinking this kind of water are and I think they are extremely positive and so I didn't see anything in the description that talked about, talking about what the impact, the positive impact – because, you know, this is going to be better water instead of having water that's agricultural runoff from areas all over the state going into our raw water. This will be raw water that's virtually distilled. And under alternatives, it talks about IPR or DPR but there's a real high likelihood that it's going to be some sort of a hybrid between IPR and DPR and I hope that a hybrid is listed as an alternative because if we go to DPR it won't be pure DPR. And the other is I think – I wish that it would make a distinction between the two kinds of DPR. One kind of DPR like we have from [DCAL] where it goes straight into the plumbing and the other where it goes into a reservoir, just closer to the treatment plant. And I think those two are substantially different and it probably would be a lot clearer if it analyzed for both kinds of DPR. Thank you.

MALE: Can I come back?

HERRMANN: First, I want to see if there's anybody else from the public who hasn't spoken who would like to put something on the record right now. If not, go ahead, Scott but rename, you know, state your name again, please.

MALE: Scott Andrews, picking up on Mr. Peaugh's point. I'd like any current lobbying efforts to be identified by California water interests to get rid of that step of piping to reservoirs and directly putting them into the water plants. And one more. Again, now regarding conservation, I'd like a cost comparison analysis of different percentages of current use saved by conservation as compared to the pure water treated per gallon, if you will. Thank you.

HERRMANN: Is there anybody else in the audience that would like to speak on the record right now? Okay, if not, then I'll go ahead and take this time to close the meeting. And if other, if people show up and we're still here then I'll go ahead and let them speak on the record but if nobody else wants to speak then we'll go ahead and stop. This closes the public environmental scoping meeting for the Pure Water Program. Your input will be transcribed, considered by City Staff for use in the scope of the EIR and included as part of the official record for the document. Speakers and commenters will be also, will also be placed on the notification list for further environmental review actions related to this project. I would also like to remind everyone that this is just the start of the environmental review process and opportunities for public input. There will be other opportunities to provide comment on the project such as during public review of the draft environmental document and any further public hearings that are conducted by the Public Utilities Department. Again, thank you for taking the time to participate in the meeting and have a great evening. Please remember if you have written comments you can leave them in the box or you can mail them to me and don't forget to sign in. and since there's time, Staff is still here. Feel free to ask them any questions. Again, they just won't be on the record. Thank you.

