DRAFT
CANDIDATE FINDINGS
for the
PURE WATER PROGRAM
Project No. 438188
SCH No. 2014111068

I. INTRODUCTION

A. Findings of Fact

The following Candidate Findings are made for the Pure Water Program (Program). The environmental effects of the Program are addressed in the final Program Environmental Impact Report (PEIR) dated August 8, 2016, which is incorporated by reference herein.

The California Environmental Quality Act (CEQA) [Section 21081(a)] and the State CEQA Guidelines [Section15091(a)] require that no public agency shall approve or carry out a project for which an environmental impact report has been completed which identifies one or more significant effects thereof, unless such public agency makes one or more of the following findings:

1. Changes or alterations have been required in, or incorporated into, the project which mitigate or avoid the significant environmental effects on the environment;
2. Those changes or alterations are within the responsibility and jurisdiction of another public agency and have been or can or should be adopted by that other agency; or
3. Specific economic, legal, social, technological, or other considerations, including considerations for the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report.

CEQA also requires that the findings made pursuant to Section 15091 be supported by substantial evidence in the record (Section 15091(b) of the State CEQA Guidelines). Under CEQA, substantial evidence means enough relevant information has been provided (and reasonable inferences from this information may be made) that a fair argument can be made to support a conclusion, even though other conclusions might also be reached. Substantial evidence must include facts, reasonable assumptions predicted upon facts, and expert opinion supported by facts (Section 15384 of the State CEQA Guidelines).

CEQA further requires the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental effects when determining whether to approve the project. If the specific economic, legal, social, technological, or other benefits of a proposed project outweigh the unavoidable adverse environmental effects, the adverse environmental effects may be considered "acceptable" (Section 15093(a) of the State CEQA Guidelines). When the lead agency approves a project which will result in the occurrence of significant effects which are identified in the final PEIR but are

not avoided or substantially lessened, the agency shall state in writing the specific reasons to support its actions based on the final PEIR and/or other information in the record.

The following Candidate Findings have been submitted by the City of San Diego Public Utilities Department as Candidate Findings to be made by the decision making body. The Planning Department (Planning) Environmental & Policy Analysis Division does not recommend that the discretionary body either adopt or reject these findings. They are attached to allow readers of this report an opportunity to review the applicant's position on this matter. It is the exclusive discretion of the decision-maker certifying the PEIR to determine the adequacy of the proposed Candidate. It is the role of staff to independently evaluate the proposed the Candidate Findings, and to make a recommendation to the decision-maker regarding their legal adequacy.

B. Environmental Review Process

The lead agency approving the Program and conducting environmental review under the California Environmental Quality Act (California Public Resources Code Sections 21000, et seq., and the Guidelines promulgated thereunder in California Code of Regulations, Title 14, Sections 15000 et seq. (CEQA Guidelines), hereinafter collectively, CEQA) shall be the City of San Diego (the City). The City as lead agency shall be primarily responsible for carrying out the Program. In compliance with Section 15082 of the CEQA Guidelines, the City published a Notice of Preparation on November 24, 2014, which began a 30-day period for comments on the appropriate scope of the PEIR. Consistent with Public Resources Code Section 21083.9, the City held a public agency scoping meeting on December 9, 2014 at the City of San Diego South Bay Recreation Center and on December 11, 2014 at the Public Utilities Department Metropolitan Operations Complex. The purpose of this meeting was to seek input and concerns from the public regarding the environmental issues that may potentially result from the Program.

The City published a draft Environmental Impact Report on February 10, 2016 in compliance with CEQA. Pursuant to CEQA Guidelines Section 15085, upon publication of the draft PEIR, the City filed a Notice of Completion with the Governor's Office of Planning and Research, State Clearinghouse, indicating that the draft PEIR had been completed and was available for review and comment by the public. The City also posted a Notice of Availability of the draft PEIR at this time pursuant to CEQA Guidelines Section 15087. The draft PEIR was circulated for 60 days for public review from February 10, 2016 to April 11, 2016. After the close of public review period, the City provided responses in writing to all comments received on the draft PEIR.

The final PEIR for the Program was published on August 8, 2016. The final PEIR has been prepared in accordance with CEQA and the State CEQA Guidelines. Pursuant to CEQA Guidelines Section 15084(d)(3), the applicant

retained a consultant, Dudek, to assist with the preparation of the environmental documents. The City, acting as the Lead Agency, has reviewed and edited as necessary the submitted drafts and certified that the final PEIR reflects its own independent judgment and analysis under Guideline Section 15090(a)(3) and CEQA Section 21082.1(a)-(c). In accordance with Section 21081.6 of CEQA, a mitigation, monitoring, and reporting program (MMRP) will be adopted upon certification of the final PEIR to ensure that the mitigation measures are enforceable and implemented.

The PEIR addresses the environmental effects associated with implementation of the Program. The PEIR is intended to serve as an informational document for public agency decision-makers and the general public regarding the objectives and components of the Program. The PEIR addressed the potential significant adverse environmental impacts associated with the Program, and identifies feasible mitigation measures and alternatives that may be adopted to reduce or eliminate these impacts. The PEIR is incorporated by reference into this CEQA findings document.

The PEIR is the primary reference document for the formulation and implementation of a mitigation monitoring program for the Program. Environmental impacts cannot always be mitigated to a level that is considered less than significant. In accordance with CEQA, if a lead agency approves a Program that has significant unavoidable impacts that cannot be mitigated to a level below significance, the agency must state in writing the specific reasons and overriding considerations for approving the Program based on the final CEQA documents and any other information in the public record for the Program (CEQA Guidelines, Section 15093). This is called a "statement of overriding considerations" (CEQA Guidelines, Section 15093). As disclosed in the PEIR and this Candidate Findings, the Program would not result in unavoidable environmental effects; therefore, a Statement of Overriding Considerations is not required.

The documents and other materials that constitute the record of proceedings on which the City's CEQA findings are based are located at the City of San Diego Planning Department, located at 1010 Second Avenue, Suite 1200, East Tower, MS 413, San Diego, CA 92101. This information is provided in compliance with Public Resources Code Section 21081.6(a)(2).

II. PROJECT SUMMARY

A. Project Location

The Program includes a variety of facilities located throughout the central and southern coastal areas of San Diego County. The Program location can be generally described in three major geographic components: North City, South Bay, and the Central Area. New advanced water purification facilities and the majority of pump stations would be located within the corporate boundaries of

the City. Pipelines would traverse a number of local jurisdictions, including the Cities of San Diego, La Mesa, El Cajon, Santee, Chula Vista, National City and the community of Lakeside in unincorporated San Diego County, in addition to federal lands within Marine Corps Air Station (MCAS) Miramar, Naval Base Point Loma and the U.S. Marine Corp Recruit Depot.

B. Project Description

The Program would treat municipal wastewater to levels suitable for potable reuse in order to create a new, reliable, local source of water while at the same time reducing the City's reliance on imported water. The City currently relies on imported water for 85% of its water supply, including the California State Water Project and the Colorado Rivers (conveyed via the California Aqueduct and the Colorado River Aqueduct, respectively). The region's reliance on imported water causes San Diego's water supply to be vulnerable to impacts from shortages, disruptions, and susceptible to price increases. In addition, recurring drought conditions further impact water supply availability. The Program would also divert wastewater from the Point Loma Wastewater Treatment Plant (PLWTP), thereby reducing the total dissolved suspended solids discharged by the PLWTP to the same or lower levels as would be achieved by implementing full secondary treatment.

The Program would use advanced water purification technology to produce potable water from recycled water and provide a safe, reliable and cost-effective drinking water supply for San Diego. The Program consists of the design and construction of new advanced water purification facilities and a new water reclamation plant; upgrades to existing water reclamation and wastewater treatment facilities; and design and construction of new pump stations and pipelines. The following Program components are currently contemplated as comprising the entirety of the Program; however, Program components are subject to change during future project-level design.

The Program would construct advanced water purification facilities (AWPFs) at the existing North City Water Reclamation Plant (NCWRP) and South Bay Water Reclamation Plant (SBWRP), and a third AWPF and new WRP would be constructed. Upgrades would occur at the existing NCWRP and SBWRP in order to provide sufficient tertiary influent for the AWPFs. Pump station and pipeline facilities would convey different types of flows to and from the treatment facilities for: 1) diverting wastewater flows to water reclamation facilities; 2) conveying recycled water to advanced water purification facilities; 3) conveying purified water from AWPFs to the San Vicente and Lower Otay Reservoirs; and 4) transporting waste flows (brine and sludge) from treatment processes to solids handling facilities or back into the Metro System. Upgrades would also occur at the Metropolitan Biosolids Center and PLWTP to handle the additional brine and sludge produced by the WRP expansions and advanced water purification process.

C. Project Objectives

The Program is proposed by the City of San Diego to use advanced water purification technology to produce potable water from recycled water and provide a safe, reliable, and cost-effective drinking water supply for San Diego. The stated objectives of the Program are:

1. Provide a cumulative total of at least 83 million gallons per day (MGD) of local, high-quality purified water to serve the San Diego Region.
2. Reduce dependence on imported water.
3. Reduce energy consumption associated with importing water.
4. Increase use of recycled water.
5. Reduce flows to the PLWTP and reduce total dissolved suspended solids discharged at the Point Loma ocean outfall to the same or lower levels as would be achieved by implementing secondary treatment at the full plant capacity.
6. Implement the Program in scheduled phases that meet the target online dates agreed to in the 2014 Cooperative Agreement and the 2015 Application for Renewal of National Pollutant Discharge Elimination System (NPDES) permit[1].

III. ISSUES ADDRESSED IN PEIR

The final PEIR contains an environmental analysis of the potential impacts associated with implementing the Program. The City of San Diego Planning Department, located at 1010 Second Avenue, Suite 1200, East Tower, MS 413, San Diego, CA 92101, is the custodian of the final PEIR and other materials.

The major issues that are addressed in the final PEIR include land use; air quality and odor; health and safety; biological resources; noise; historical resources; hydrology and water quality; paleontological resources; public utilities; visual effects and neighborhood character; energy; geology and soils; transportation, circulation, and parking; public services; greenhouse gas (GHG) emissions; and water supply. The final PEIR concluded that significant direct and/or indirect impacts could potentially occur with respect to the following issues:

1. Land Use (Conflicts with Environmentally Sensitive Lands regulations and Historical Resource Regulations)
2. Land Use (Conflicts with Multiple Species Conservation Program and Other Adopted Environmental Plans)

[1] Modified permit application that commits to the goal of implementing a potable reuse program and obtaining legislative or administrative actions such that the Point Loma ocean outfall discharge is recognized as equivalent to secondary treatment for purposes of compliance with the CWA (secondary equivalency).

3. Land Use (Conflicts with Airport Land Use Compatibility Plan)
4. Air Quality and Odor (Emissions of Criteria Pollutants)
5. Air Quality and Odor (Increases Operational Odors)
6. Health and Safety (Wildfire Hazards)
7. Health and Safety (Hazardous Material Exposure)
8. Health and Safety (Conflict with Hazardous Material Sites)
9. Health and Safety (Required Review by Airport Land Use Commission and Federal Aviation Administration)
10. Biological Resources (Conflict with Sensitive Habitat)
11. Biological Resources (Conflict with Wetlands)
12. Biological Resources (Loss of Sensitive Species)
13. Biological Resources (Conflict with Wildlife Linkages and Corridors)
14. Biological Resources (Conflict with Habitat Conservation Plans)
15. Biological Resources (Conflict with Multi-Habitat Planning Area)
16. Biological Resources (Introduction of Invasive Species)
17. Noise (Conflict with Noise Thresholds)
18. Historical Resources (Loss of Historical Resources)
19. Historical Resources (Disturbance of Human Remains)
20. Hydrology and Water Quality (Runoff Impacts)
21. Hydrology and Water Quality (Changes to Surface/Ground Water Quality)
22. Hydrology and Water Quality (Cumulative Impacts)
23. Paleontological Resources (Loss of Paleontological Resources)
24. Public Utilities (Generation of Solid Waste)
25. Visual Effects and Neighborhood Character (Landform Alteration)
26. Visual Effects and Neighborhood Character (Impacts to Scenic Vistas)
27. Visual Effects and Neighborhood Character (Alteration to Visual Character)
28. Geology and Soils (Exposure to Geological Hazards)
29. Geology and Soils (Increased Erosion)
30. Geology and Soils (Unstable Geological Conditions)
31. Transportation, Circulation, and Parking (Disruption of Access)

IV. SUMMARY OF IMPACTS

A. Findings Regarding Impacts that Can Be Mitigated to Below a Level of Significance

The City, having reviewed and considered the information contained in the final PEIR, finds pursuant to CEQA Section 21081(a)(1) and CEQA Guidelines Section 15091(a)(1) that changes or alterations have been required in, or incorporated into, the Program which would mitigate, avoid, or substantially lessen to below a level of significance potential significant direct environmental effects related to: land use; air quality and odor; health and safety; biological resources, noise, historical resources; hydrology and water quality; paleontological resources; public utilities; visual effects and neighborhood character; geology and soils; and transportation, circulation, and parking. The basis for this conclusion follows.

1) Land Use (Conflicts with Environmentally Sensitive Lands Regulations and Historical Resource Regulations)

Impact: Within the Program area, Environmentally Sensitive Lands (ESLs) include sensitive biological resources including lands within the City's Multi-Habitat Planning Area (MHPA) and special flood hazard areas (i.e., floodways in river valleys). Development of future Program components that would encroach into ESL resources would be subject to the development restrictions of the ESL Regulations (Land Development Code, Section 143.0101 et. seq.).

The Historical Resources Regulations (Section 143.0213(a) of the Land Development Code) apply when historical resources are present. Given the presence of historical resources distributed throughout the Program area, implementation of the Program has the potential to result in significant impacts to historic built-environment resources and archaeological resources.

Finding: Incorporation of Mitigation Framework measures MM-LU-1 and MM-LU-2 would reduce potential conflicts with Environmentally Sensitive Lands Regulations and Historical Resource Regulations to below a level of significance.

Facts in Support of Finding: Where applicable the development of all future Program components would be required to comply with the ESL Regulations and would be evaluated in accordance with the City's Biology Guidelines. Additionally, all Program components would be subject to future evaluation in accordance with CEQA. At that time, appropriate site-specific mitigation in accordance with the Mitigation Framework measures MM-LU-1 and MM-BIO-1 through BIO-3 would be identified for impacts to sensitive biological resources covered under the ESL regulations. For other resource areas covered under the ESL regulations, such as steep hillsides, future Program components would be designed to ensure compliance with the supplemental regulations and any other regulatory requirements to ensure that no impacts would occur.

Incorporation of the Mitigation Framework measure MM-LU-2 and Mitigation Framework measures MM-HIST-1 and MM-HIST-2 contained in Section 5.6, Historical Resources, would reduce the potential for significant impacts at the Program-level to below a level of significance.

2) Land Use (Conflicts with MSCP or Other Adopted Environmental Plans)

Impact: Program components implemented in accordance with the Program could result in direct and/or indirect impacts to the MHPA, direct impacts to County of San Diego Preserves and Resource Protection Ordinance (RPO) resources, City of Chula Vista Multiple Species Conservation Program (MSCP) and Otay Ranch Resources Management Plan, the MCAS Miramar Integrated Natural Resources Management Plan (INRMP) and the San Diego Bay National Wildlife Refuge Comprehensive Conservation Plan (NWR CCP), the Point Loma Ecological Conservation Area (PLECA), and the City of San Diego Vernal Pool Habitat Conservation Plan (VPHCP). These are considered potentially significant impacts at the program level, and mitigation is required.

Finding: Incorporation of Mitigation Framework measures MM-LU-3 through MM-LU-9 would reduce Program level impacts to below a level of significance.

Facts in Support of Finding: Under MM-LU-3 all subsequent infrastructure implemented in accordance with the Program that are within or adjacent to designated MHPA areas shall comply with the Land Use Adjacency Guidelines of the MSCP in terms of land use, drainage, access, toxic substances in runoff, lighting, noise, invasive plant species, grading, and brush management requirements. All development for utilities within the MHPA shall be designed to minimize environmental impacts and must avoid disturbing the habitat of MSCP-covered species, and wetlands, as required by MM-LU-4. If such accordance and avoidance is unfeasible, impacts shall be mitigated.

MM-LU-5 requires subsequent environmental documentation for future project components with potential to impact resources protected by the County RPO shall complete a Resource Protection Study pursuant to Section 86.603 of the RPO. Consideration and implementation of siting and design criteria under MM-LU-6 will ensure compatibility of Program components and the Chula Vista MSCP Subarea Plan and Otay Ranch Resource Management Plan. If the siting of Program components would require lands to be removed from the PLECA, MM-LU-7 requires that an area of equal size and equal or greater ecological value will be added to the PLECA to offset the loss. Additionally, for proposed facilities on federal lands, MM-LU-8 requires that appropriate NEPA documentation shall be prepared and submitted to necessary federal agencies and parties including MCAS Miramar, the San Diego Bay NWR, and the U.S. Fish and Wildlife Service (USFWS). Lastly, MM-LU-9 requires the City shall coordinate with MCAS Miramar and the San Diego Bay NWR regarding project components located on federal lands and shall ensure consistency with applicable land use regulations of MCAS Miramar INRMP and the San Diego

Bay NWR CCP. Lastly, all development for future project components with potential to impact vernal pools, the City shall implement avoidance and minimization measures to minimize potential impacts to vernal pools consistent with the VPHCP and the City's ESL Regulations.

Incorporation of Mitigation Framework measures MM-LU-3 through MM-LU-9, would reduce the potential for significant impacts at the Program-level to below a level of significance.

3) Land Use (Conflicts with ALUCP)

Impact: Treatment and pumping facility upgrades and improvements would not introduce residential or other sensitive land uses within an airport compatibility zone or result in large concentrations of people within an airport safety area, and therefore, would generally not pose a land use conflict/inconsistency or safety hazard. No proposed facilities include uncovered water features that would attract birds and create a potential hazard to aircraft. Nonetheless, Program components would need to be reviewed by the Airport Land Use Commission (ALUC) and Federal Aviation Administration (FAA) to make a final determination of consistency during subsequent project review. As such, at the program level, potential inconsistencies with applicable Airport Land Use Compatibility Plans (ALUCPs) would be considered potentially significant and mitigation is required.

Finding: Incorporation of Mitigation Framework measures MM-LU-11 and MM-LU-12 would reduce potential conflict with ALUCPs to below a level of significance.

Facts in Support of Finding: As required by MM-LU-11, subsequent projects, implemented in accordance with the Program, shall submit a description of each Program component located in an airport influence area to the ALUC for consistency determinations with the applicable adopted ALUCP. Additionally, under MM-LU-12, subsequent projects that are (1) located in the Airport Approach Overlay Zone and receive an FAA determination of hazard and that are not exempt or (2) located within the Airport Land Use Compatibility Overlay Zone are proposing deviations from the overlay zone requirements, or that include a rezone or land plan approval, shall obtain a Site Development Permit in accordance with San Diego Municipal Code Section 126.0502(e).

Incorporation of Mitigation Framework measures MM-LU-11 and MM-LU-12 would reduce the potential for significant impacts at the Program-level to below a level of significance.

4) Air Quality and Odor (Emissions of Criteria Pollutants)

Impact: Daily construction emissions would not exceed the City of San Diego's significance thresholds for VOC, CO, SO_x, PM_{10}, or $PM_{2.5}$. Emissions represent maximum of summer and winter. "Summer" emissions are representative of the conditions that may occur during the ozone season (May 1 to October 31),

and "winter" emissions are representative of the conditions that may occur during the balance of the year (November 1 to April 30). It was found that daily construction emissions would exceed the threshold for NO_x during construction of the North City component only, resulting in a potentially significant impact. However, it should be noted that facilities associated with the North City component (similar to the Central Area and South Bay components) would be constructed across a broad geographic area, and therefore, would generally not result in substantial NO_x emissions in any one location.

Finding: Incorporation of Mitigation Framework measures MM-AQ-1 and MM-AQ-2 would reduce potential impacts related to emissions of criteria pollutants below a level of significance.

Facts in Support of Finding: The best management practices included in MM-AQ-1 shall be considered in all subsequent Program-level environmental analysis and implemented during construction to comply with applicable San Diego Air Pollution Control District rules and regulations, and to further reduce daily construction emissions. Additionally, MM-AQ-2 requires the implementation of construction activity measures associated with the San Vicente Purified Water Pipeline component to reduce oxides of nitrogen. Generally, these best management practices and construction associated measures require construction equipment regulations as well as construction worker practices designed to reduce potential impacts related to emissions of criteria pollutants throughout project construction.

Incorporation of Mitigation Framework measures MM-AQ-1 and MM-AQ-2 would reduce the potential for significant impacts at the Program-level to below a level of significance.

5) Air Quality and Odor (Increased Operational Odors)

Impact: Odors would be generated from vehicles and/or equipment exhaust emissions during construction of the Program facilities. Such odors are temporary and for the types of construction activities anticipated for Program components, would generally occur at magnitudes that would not affect a substantial number of people. Therefore, impacts associated with odors during construction would be considered less than significant.

From an operational standpoint, some of the proposed pump stations could be potentially located near sensitive receptors and, if left unabated, could result in nuisance odors reaching receptors nearby. AWPFs would not result in nuisance odors because the AWPFs would accommodate flows that would have undergone previous tertiary treatment. However, the Program would involve new treatment facilities, such as the Central Area Water Reclamation Plant (CAWRP) and associated pump stations, and upgrades to existing facilities that could result in potential nuisance odors if facilities would be located in proximity to sensitive receptors. Therefore, mitigation is required.

Finding: Incorporation of Mitigation Framework measure MM-AQ-3 would reduce potential impacts related to increased operational odors to below a level of significance.

Facts in Support of Finding: MM-AQ-3 requires Program components shall implement odor control systems specifically designed to abate the odorous potential of the specific facility. Odor control systems shall be similar to those currently employed at City of San Diego wastewater treatment facilities and pump stations to reduce odor impacts. A range of control systems, including NAOCl/NaOH wet scrubbers, Biofilters, or equivalent alternatives, would be implemented throughout Program construction. Odors could also be abated through the addition of chemical such as iron chloride to reduce the liquid phase concentrations and thus, reduce the amount volatilized into the gas phase.

The incorporation of Mitigation Framework measure MM-AQ-3 would reduce the potential for significant impacts at the Program-level to below a level of significance.

6) Health and Safety (Wildfire Hazards)

Impact: The Program components would primarily be located within developed areas and roadways; however portions may be located within and adjacent to open space areas with potentially flammable materials such as brush, grass, or trees. Engine-powered equipment and vehicles associated with the construction and operation of the Program could increase wildfire hazards by introducing new ignition sources to areas adjacent to or within currently undeveloped areas; therefore, impacts related to wildfire hazards would be potentially significant.

Finding: Incorporation of Mitigation Framework measures MM-HAZ-1 and MM-HAZ-2 would reduce potential impacts related to wildfire hazards to below a level of significance.

Facts in Support of Finding: MM-HAZ-1 requires a brush management plan is to be prepared by the City or its contractors prior to construction of Program components, as determined necessary by the City of San Diego. Construction within areas of dense foliage during dry conditions shall be avoided, when feasible. In cases where avoidance is not feasible, necessary brush fire prevention and management practices shall be incorporated. Additionally, the City of San Diego shall provide fire safety information to construction crews during regular safety meetings under MM-HAZ-2. Fire management techniques shall be applied during construction as deemed necessary by the City of San Diego Fire Marshal based on vegetation within the site and surrounding areas.

The incorporation of Mitigation Framework measures MM-HAZ-1 and MM-HAZ-2 would reduce the potential for significant impacts at the Program-level to below a level of significance.

7) Health and Safety (Hazardous Material Exposure)

Impact: The use, storage, transportation, and disposal of these substances is regulated by the County Department of Environmental Health Hazardous Materials Division, and would be conducted according to all applicable federal, state, and local regulations. Existing and recently enacted legislation to protect the public from any potential impacts from the use of hazardous materials includes the Clean Air Act, the Clean Water Act, the Comprehensive Environmental Response, Compensation, and Liability Act, and the Toxic Substances Control Act. The Program components' adherence to statutory standards and practices would reduce the risk of an explosion or release of hazardous substances to the environment due to an accident or upset conditions. The Program would implement project-specific hazardous materials business plans and other safety programs for each subsequent Program component, as required by law, substantially reducing the risk of an accidental release of a hazardous material. The use of hazardous materials at each treatment facility site for their intended purpose is not expected to pose a hazard to the public or environment. However, the risk for hazardous materials exposure during routine transport, use, or disposal of hazardous materials is potentially significant and mitigation is required.

Finding: Incorporation of Mitigation Framework measures MM-HAZ-3 through MM-HAZ-5 would reduce potential impacts related to hazardous materials exposure to below a level of significance.

Facts in Support of Finding: Compliance with regulatory requirements for safe handling and storage of materials (see Mitigation Framework measures MM-HAZ-3 through MM-HAZ-5) would minimize hazards associated with operation of the Program. As such, the Program would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, or create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

MM-HAZ-3 requires the preparation of a Hazardous Materials Reporting Form and Hazardous Materials Review by the Development Services Department shall be prepared for each Program component in compliance with the City of San Diego's Information Bulletin 116. In accordance with Article of Chapter 6.95 of California Health and Safety Code and San Diego County Code Section 68.1113, MM-HAZ-4 requires a hazardous materials business plan shall be submitted to the Department of Environmental Health Hazardous Materials Division prior to operations of each treatment facility and every 3 years thereafter. Other safety programs shall be developed addressing hazardous materials storage locations, emergency response procedures, employee training requirements, hazard recognition, fire safety, first aid/emergency medical procedures, hazard communication training, and release reporting requirements.

Lastly, MM-HAZ-5 requires all hazardous materials shall be handled and stored, transported and disposed in accordance with all applicable federal, state, and local codes and regulations. Specific requirements of the California Fire Code that reduce the risk of fire or the potential for a release of hazardous materials that could affect public health or environment would also be adhered to.

The incorporation of Mitigation Framework measures MM-HAZ-3 through MM-HAZ-5 would reduce the potential for significant impacts at the Program-level to below a level of significance.

8) Health and Safety (Conflict with Hazardous Material Sites)

Impact: As detailed locations are not finalized for Program components, subsequent project-level analysis is required to determine the significance of potential hazardous effects for all Program components. Since hazardous materials sites are subject to changing conditions, e.g., closure of known sites, discovery of new hazardous materials sites, site leakages, and/or remediation of existing sites, site-specific hazardous materials analyses for each Program component would be required. Therefore, impacts to hazardous materials sites would be potentially significant and mitigation is required.

Finding: Incorporation of Mitigation Framework measure MM-HAZ-6 would reduce potential impacts related to hazardous materials sites to below a level of significance.

Facts in Support of Finding: MM-HAZ-6 ultimately requires that subsequent projects, implemented in accordance with the Program, shall conduct a site-specific record search for the locations and type of hazardous materials to the satisfaction of the City of San Diego. Details on the known hazardous materials locations would need to be investigated at the project level of analysis for individual Program components to determine the specifics on location, type, and status of hazardous materials sites that may be affected. An analysis shall be conducted for each Program component to determine if the component meets conditions specified in detail in MM-HAZ-6. The analysis would include a discussion of whether any Program component would be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. In the event that one of the above conditions is met, the City shall coordinate with the Department of Environmental Health to determine the appropriate corrective action (i.e., remediation) or avoidance measures (i.e. alternative facility siting).

Incorporation of Mitigation Framework measure MM-HAZ-6 would reduce the potential for significant impacts at the Program-level to below a level of significance.

9) Health and Safety (Required Review by ALUC and FAA)

Impact: Program components would be located within the Airport Influence Areas (AIAs) of San Diego International Airport, MCAS Miramar, Brown Field Municipal Airport, Montgomery Field Municipal Airport, and Gillespie Field. Specifically, the North City component would be located within the AIA of MCAS Miramar, Montgomery Field, and Gillespie Field; the Central Area component would be located within the AIA of San Diego International Airport; and the South Bay component would be located within the AIA of Brown Field. Although not governed by ALUCPs, Naval Air Station North Island is in the vicinity of the Central Area component and Naval Outlying Field Imperial Beach is in the vicinity of the South Bay component. Program components are not anticipated to pose a safety hazard for people working within an AIA; however, Program components would require review by the ALUC and FAA to make a final determination of consistency during subsequent project review.

Finding: Implementation of Mitigation Framework measures MM-LU-11 and MM-LU-12 would reduce potentially significant airport impacts to below a level of significance.

Facts in Support of Finding: MM-LU-11 requires subsequent projects, implemented in accordance with the Program, shall submit a description of each Program component located in an airport influence area to the ALUC for consistency determinations with the applicable adopted ALUCP. Additionally, MM-LU-12 states subsequent projects that are (1) located in the Airport Approach Overlay Zone and receive an FAA determination of hazard and that are not exempt or (2) located within the Airport Land Use Compatibility Overlay Zone are proposing deviations from the overlay zone requirements, or that include a rezone or land plan approval, shall obtain a Site Development Permit in accordance with San Diego Municipal Code Section 126.0502(e).

Incorporation of Mitigation Framework measures MM-LU-11 and MM-LU-12 would reduce the potential for significant impacts at the Program-level to below a level of significance.

10) Biological Resources (Conflict with Sensitive Habitat)

Impact: The Biological Resources Report (Appendix C of the PEIR) evaluated potential direct impacts to biological resources in the study corridor identified by the City as 500 feet on either side of the conceptual alignments of proposed pipelines and a 300-foot study area around proposed buildings and other facilities. Potential indirect impacts to sensitive wildlife species and preserves were evaluated in a 0.5-mile corridor around all proposed facilities, including pipelines. Impacts to sensitive habitat or sensitive natural communities at the proposed North City Advanced Water Purification Facility (NCAWPF) (Tier IIIB), the reservoir outfall/discharge structure (ROD) at San Vicente Reservoir (CoTier III), the ROD at Otay Reservoir, and the Otay Reservoir Booster Station (Tier

II/CoTier II) would be permanent and unavoidable. Without implementation of the mitigation described below, permanent impacts would be considered potentially significant.

Impacts to sensitive habitat or sensitive natural communities at all other proposed Program facilities, whether direct or indirect, would be temporary. Without implementation of the mitigation described below, temporary impacts would be considered potentially significant.

Finding: Incorporation of Mitigation Framework measure MM-BIO-1 would reduce potential impacts to sensitive habitats or sensitive natural community to below a level of significance.

Facts in Support of Finding: Where sensitive biological resources are known or suspected on or adjacent to a proposed project site, MM-BIO-1 requires a biological assessment shall be performed by a qualified City-approved biologist familiar with MSCP Subarea Plans for the City of San Diego, County of San Diego, and City of Chula Vista for that project. It is expected that the majority of sensitive species not covered by the MSCP will be adequately mitigated through the habitat-based mitigation required by the City of San Diego (2012). However, mitigation requirements and protocols may be required to ensure that impacts on sensitive species are reduced to below a level of significance. Sensitive wildlife mitigation must be developed in accordance with all applicable federal, state, and local laws and protocols (including the MSCP Subarea Plan Appendix A Conditions of Coverage) in effect at the time when permits are applied for.

Future projects resulting in impacts on sensitive upland Tier I, II, IIIA, or IIIB habitats shall implement avoidance and minimization measures consistent with the City Biology Guidelines and MSCP Subarea Plan and provide suitable mitigation in accordance with the City's Biology Guidelines and MSCP Subarea Plan. Mitigation for impacts on sensitive species communities shall be implemented at the time future projects are proposed. The details of these mitigation requirements are identified under MM-BIO-1 in the PEIR.

Incorporation of Mitigation Framework measure MM-BIO-1 would reduce the potential for significant impacts at the Program-level to below a level of significance.

11) <u>Biological Resources (Conflict with Wetlands)</u>

Impact: Where possible, siting of the facilities within existing streets and unpaved roadways and on existing bridges, as well as using appropriate construction methods, such as auger boring/pipe jacking, horizontal directional drilling or microtunneling, or by using existing subterranean pipe, would provide an opportunity for avoidance. However, impacts to wetlands would occur at the NCAWPF, the ROD at San Vicente Reservoir, and the ROD at Otay Reservoir.

Although some level of minimization at these proposed facility sites would be possible, impacts would be permanent and unavoidable. Without implementation of the Mitigation Framework described below, permanent impacts would be considered potentially significant.

Impacts to wetlands at all other proposed Program facilities, whether direct or indirect, would be temporary. Without implementation of the Mitigation Framework described below, temporary impacts would be considered potentially significant.

Finding: Incorporation of Mitigation Framework measures MM-BIO-1 and MM-BIO-2 would reduce potential impacts related to wetland areas to below a level of significance.

Facts in Support of Finding: To reduce potential direct impacts on City, state, and federally regulated wetlands, MM-BIO-2 requires all subsequent projects shall be required to comply with U.S. Army Corps of Engineers Clean Water Act Section 404 requirements and special conditions, the Regional Water Quality Control Board (RWQCB) in accordance with Section 401 of the Clean Water Act, California Department of Fish and Wildlife Section 1602 Streambed Alteration Agreement requirements and special conditions, and the City of San Diego ESL Regulations for minimizing impacts on wetlands. Achieving consistency with these regulations for impacts on wetlands and special aquatic sites would reduce potential impacts on regulated wetlands and provide compensatory mitigation (as required) to ensure no net loss of wetland habitats. In addition, the USFWS would be involved under Section 7 of the federal Endangered Species Act during consultation initiated by the U.S. Army Corps of Engineers during the 404 permit process if federal listed species are present. If there is no federal nexus to jurisdictional waters, then a Section 10(A) authorization from USFWS would be required to cover any potential effects on federal listed species. With additional consideration for the requirements outlined in MM-BIO-1, a required biological assessment shall be performed by a qualified City-approved biologist familiar with MSCP Subarea Plans for the City of San Diego, County of San Diego, and City of Chula Vista.

Incorporation of Mitigation Framework measures MM-BIO-1 and MM-BIO-2 would reduce the potential for significant impacts at the Program-level to below a level of significance.

12) Biological Resources (Loss of Sensitive Species)

Impact: A majority of the study area for the proposed Program is located in existing streets and developed areas in an urbanized setting. Most of the database occurrence records for sensitive species that overlap the proposed Program study area do not reflect species locations actually within the footprint of the proposed facilities, as those facilities are likely to be sited on currently developed lands and minimal, if any, suitable habitat is present. The

potential for direct impacts to sensitive species is highest where the proposed facilities and/or alignments would be located in undeveloped land; however, many of those locations are also in urbanized areas where the potential for sensitive species in the study area footprint is low. High potential for direct impacts is restricted to river crossings, vernal pool complexes, and places such as Otay Valley where proposed facilities would be located outside of urbanized areas. Additionally, construction noise would potentially result in impacts to sensitive species occupying adjacent habitat.

Finding: Incorporation of Mitigation Framework measures MM-BIO-1 and MM-BIO2 would reduce potential impacts to sensitive species to below a level of significance.

Facts in Support of Finding: Compliance with all provisions of MSCP Subarea Plans and the INRMP, ESA compliance on land not covered by one of the plans, implementation of Mitigation Framework measures MM-BIO-1, MM-BIO-2, would ensure that potentially significant direct and indirect impacts to sensitive species are reduced to below a significant level. Measures proposed address both temporary and permanent impacts during construction and operations.

Regarding the construction of the Program, MM-BIO-1 requires for proposed project components adjacent to or within the MHPA, construction noise that exceeds the maximum levels allowed shall be avoided, especially during the breeding season for protected avian species. Additionally, where sensitive biological resources are known or suspected on or adjacent to a proposed project site, a biological assessment shall be performed by a qualified City-approved biologist familiar with MSCP Subarea Plans for the City of San Diego, County of San Diego, and City of Chula Vista for that project. Under MM-BIO-2 the USFWS would be involved under Section 7 of the federal Endangered Species Act during consultation initiated by the U.S. Army Corps of Engineers during the 404 permit process if federal listed species are present. If there is no federal nexus to jurisdictional waters, then a Section 10(A) authorization from USFWS would be required to cover any potential effects on federal listed species.

Incorporation of Mitigation Framework measures MM-BIO-1 and MM-BIO-2 would reduce the potential for significant impacts at the Program-level to below a level of significance.

13) Biological Resources (Conflict with Wildlife Linkages and Corridors)

Impact: The study area for the proposed Program facilities was analyzed for potential impacts to wildlife core and linkage areas identified in the San Diego, County and Chula Vista MSCP Subregional Plan(s), as related to their function in facilitating in wildlife movement. Of the potential permanent or temporary impacts, those considered direct would include but not be limited to,

construction of new aboveground facilities that would impede wildlife access to foraging habitat, breeding habitat, water sources, or other areas necessary for their reproduction, interference with otherwise natural movement wildlife corridors/linkages, would further constrain an already narrow corridor, or cause increased traffic on existing or new access roads that would result in significant road-kill.

Construction and operations of the facilities would also indirectly impact wildlife movement by increasing noise and/or nighttime lighting in a wildlife corridor or linkage, by removal of available vegetative cover, or by placing of incompatible uses adjacent to a corridor. This Program-level analysis is based upon a conceptual design only, and specific locations for each facility relative to wildlife corridors are not known or confirmed to a project-level or design-level of detail. However, the potential for impacts to wildlife corridors at each facility is provided in the Biological Resources chapter of the FEIR. Impacts to City MHPA, including core and linkage areas, could result in potentially significant impacts.

Finding: Incorporation of Mitigation Framework measures MM-BIO-1 and MM-BIO-3 would reduce potential impacts to wildlife movement to below a level of significance.

Facts in Support of Finding: Prior to subsequent project level review, MM-BIO-1 requires all projects which could have potentially significant impacts resulting in a reduction in the number of unique, rare, endangered, sensitive, or fully protected species of plants or animals shall be analyzed in accordance with the CEQA Significance Thresholds. This requires that site-specific biological resources surveys be conducted in accordance with City of San Diego Biology Guidelines (2012) and MSCP Subarea Plan.

With regards to MM-BIO-3 mitigation to reduce potentially significant impacts from subsequent project components that would interfere with the nesting, foraging, or movement of wildlife species within the Program area shall be identified in a site-specific biological resources report prepared in accordance with City of San Diego Biology Guidelines. Measures that shall be incorporated into project-level construction documents to minimize direct impacts on wildlife movement, nesting, or foraging activities shall be addressed in the biology report and shall include recommendations for preconstruction protocol surveys to be conducted during established breeding seasons, construction noise monitoring and implementation of any species-specific mitigation plans in order to comply with the federal Endangered Species Act, MBTA, State Fish and Game Code, and/or the ESL Regulations.

Incorporation of Mitigation Framework measures MM-BIO-1 and MM-BIO-3 would reduce the potential for significant impacts at the Program-level to below a level of significance.

14) Biological Resources (Conflict with Habitat Conservation Plans)

Impact: The study area for the proposed Program facilities was analyzed for potential conflicts with City, of San Diego, County of San Diego, and City of Chula Vista MSCP Subarea Plans, County RPO wetland buffer requirements, the San Diego Bay NWR CCP, the Draft VPHCP, the MCAS Miramar INRMP, and the MOU for PLECA. The study area for the proposed Program facilities is located entirely within or crosses through portions of the various local adopted local habitat conservation plans or policies that protect biological resources. Compliance with all provisions of these plans and policies, including implementing any mitigation requirements specific to each one, subject to review by the agencies with regulatory oversight, would be required. This compliance, mitigation implementation, and regulatory review would ensure that no conflicts with the plans and policies occur.

Finding: Incorporation of Mitigation Framework measures MM-BIO-1 and MM-LU-3 through MM-LU-9 would reduce potential impacts to below a level of significance.

Facts in Support of Finding: MM-BIO-1 requires a biological assessment shall be performed by a qualified City-approved biologist familiar with MSCP Subarea Plans for the City of San Diego, County of San Diego, and City of Chula Vista for that project. It is expected that the majority of sensitive species not covered by the MSCP will be adequately mitigated through the habitat-based mitigation required by the City of San Diego (2012). However, mitigation requirements and protocols may be required to ensure that impacts on sensitive species are reduced to below a level of significance. Sensitive wildlife mitigation must be developed in accordance with all applicable federal, state, and local laws and protocols (including the MSCP Subarea Plan Appendix A Conditions of Coverage) in effect at the time when permits are applied for.

Under MM-LU-3 all subsequent infrastructure implemented in accordance with the Program that are within or adjacent to designated MHPA areas shall comply with the Land Use Adjacency Guidelines of the MSCP in terms of land use, drainage, access, toxic substances in runoff, lighting, noise, invasive plant species, grading, and brush management requirements. All development for utilities within the MHPA shall be designed to minimize environmental impacts and must avoid disturbing the habitat of MSCP-covered species, and wetlands, as required by MM-LU-4. If such accordance and avoidance is unfeasible, impacts shall be mitigated.

MM-LU-5 requires subsequent environmental documentation for future project components with potential to impact resources protected by the County RPO shall complete a Resource Protection Study pursuant to Section 86.603 of the RPO. Consideration and implementation of siting and design criteria under MM-LU-6 will ensure compatibility of Program components and the Chula Vista MSCP Subarea Plan and Otay Ranch Resource Management Plan. If the siting of

Program components would require lands to be removed from the PLECA, MM-LU-7 requires that an area of equal size and equal or greater ecological value will be added to the PLECA to offset the loss. Additionally, for proposed facilities on federal lands, MM-LU-8 requires that appropriate NEPA documentation shall be prepared and submitted to necessary federal agencies and parties including MCAS Miramar, the San Diego Bay NWR, and USFWS. Lastly, MM-LU-9 requires the City shall coordinate with MCAS Miramar and the San Diego Bay NWR regarding project components located on federal lands and shall ensure consistency with applicable land use regulations of MCAS Miramar INRMP and the San Diego Bay NWR CCP. Lastly, all development for future project components with potential to impact vernal pools, the City shall implement avoidance and minimization measures to minimize potential impacts to vernal pools consistent with the VPHCP and the City's ESL Regulations.

Incorporation of Mitigation Framework measures MM-BIO-1 and MM-LU-3 through MM-LU-9 would reduce the potential for significant impacts at the Program-level to below a level of significance.

15) Biological Resources (Conflict with MHPA)

Impact: The following Program components (or portions thereof) are anticipated to be located adjacent to the MHPA: Wastewater Force Main/Brine Pipeline from the NCWRP to the Proposed Morena Boulevard Pump Station; San Vicente Purified Water Pipeline; sludge pipeline from CAWRP to PLWTP; Central Area Advanced Water Purification Facility (CAAWPF); Central Area Tertiary Effluent Force Main and Brine Conveyance; Central Area Purified Water Pipeline; South Bay Advanced Water Purification Facility; South Bay Solids Processing Facility; Wastewater Force Main from National City to SBWRP; and the South Bay Purified Water Pipeline. The ROD at San Vicente Reservoir, Otay Reservoir Booster Station, and ROD at Otay Reservoir would be located entirely within the MHPA. The components adjacent of intersecting the MHPA could result in potential adverse edge effects to the MHPA as a result of indirect impacts such as drainage, toxins, lighting, noise, barriers to incursion, invasive species, brush management, and grading/land development. Compliance with the MHPA Land Use Adjacency Guidelines would be required for implementation of all Program components developed in areas adjacent to or within the MHPA.

Finding: Implementation of Mitigation Framework measures MM-BIO-1 and MM-LU-3 through MM-LU-9 would reduce conflicts with MHPA to below a level of significance.

Facts in Support of Finding: MM-BIO-1 requires any necessary MHPA boundary adjustments shall be processed by the individual project applicants through the City and Wildlife Agencies during the early project planning stage. Mitigation for impacts on sensitive upland habitats shall occur in accordance with the MSCP mitigation ratios as specified within the City's Biology Guidelines (City of San Diego 2012). These mitigation ratios are based on the

tier level of the vegetation community, the location of the impact, and the location of the mitigation site(s). For example, impacts on lands inside the MHPA and mitigated outside the MHPA would have the highest mitigation ratio, whereas impacts on lands outside the MHPA and mitigated inside the MHPA would have the lowest mitigation ratio.

Under MM-LU-3 all subsequent infrastructure implemented in accordance with the Program that are within or adjacent to designated MHPA areas shall comply with the Land Use Adjacency Guidelines of the MSCP in terms of land use, drainage, access, toxic substances in runoff, lighting, noise, invasive plant species, grading, and brush management requirements. All development for utilities within the MHPA shall be designed to minimize environmental impacts and must avoid disturbing the habitat of MSCP-covered species, and wetlands, as required by MM-LU-4. If such accordance and avoidance is unfeasible, impacts shall be mitigated.

MM-LU-5 requires subsequent environmental documentation for future project components with potential to impact resources protected by the County RPO shall complete a Resource Protection Study pursuant to Section 86.603 of the RPO. Consideration and implementation of siting and design criteria under MM-LU-6 will ensure compatibility of Program components and the Chula Vista MSCP Subarea Plan and Otay Ranch Resource Management Plan. If the siting of Program components would require lands to be removed from the PLECA, MM-LU-7 requires that an area of equal size and equal or greater ecological value will be added to the PLECA to offset the loss. Additionally, for proposed facilities on federal lands, MM-LU-8 requires that appropriate NEPA documentation shall be prepared and submitted to necessary federal agencies and parties including MCAS Miramar, the San Diego Bay NWR, and USFWS. Lastly, MM-LU-9 requires the City shall coordinate with MCAS Miramar and the San Diego Bay NWR regarding project components located on federal lands and shall ensure consistency with applicable land use regulations of MCAS Miramar INRMP and the San Diego Bay NWR CCP. Lastly, all development for future project components with potential to impact vernal pools, the City shall implement avoidance and minimization measures to minimize potential impacts to vernal pools consistent with the VPHCP and the City's ESL Regulations.

Incorporation of MM-BIO-1 and MM-LU-3 through MM-LU-9 would reduce the potential for significant impacts at the Program-level to below a level of significance.

16) <u>Biological Resources (Introduction of Invasive Species)</u>

Impact: Consistency with the City's MHPA Land Use Adjacency Guidelines and similar policies in the County of San Diego and City of Chula Vista would be required at the project level for the Program facilities identified above as having potential to cause adverse edge effects through the introduction of invasive species into natural open areas.

For all applicable Program components, ensuring that ground-disturbance is implemented in existing developed, disturbed, and non-native areas would minimize new disturbance to natural areas. Where proposed facilities cross open space in rivers, using auger boring/pipe jacking or horizontal directional drilling construction methods would avoid surface disturbance and minimize the introduction of invasive species into riparian areas. Further, project-level analyses will include requirements for revegetation of areas disturbed during construction, using native species palettes to prevent the disturbed habitat from being colonized with ruderal species that subsequently disperse into natural areas.

Finding: Incorporation of Mitigation Framework measure MM-LU-3 would prevent invasive species from adversely affecting natural open areas.

Facts in Support of Finding: Under MM-LU-3 all subsequent infrastructure implemented in accordance with the Program that are within or adjacent to designated MHPA areas shall comply with the Land Use Adjacency Guidelines of the MSCP in terms of land use, drainage, access, toxic substances in runoff, lighting, noise, invasive plant species, grading, and brush management requirements. Specifically, MM-LU-3 requires no invasive plant species shall be introduced into areas adjacent to the MHPA.

Incorporation of MM-LU-3 would reduce the potential for significant impacts at the Program-level to below a level of significance.

17) Noise (Conflict with Noise Thresholds)

Impact: Noise levels could create temporary substantial noise increases and result in short-term exceedance of construction noise standards during construction of all portions of the North City, South Bay, and Central Area components, resulting in a potentially significant impact.

As final design locations and specifications are not yet available for the pump stations, AWPFs, WRPs, and PLWTP, it cannot be determined if operation of these facilities would result in adverse noise effects on nearby noise-sensitive land uses at a program-level analysis. Therefore, operational noise impacts resulting from the pump stations and treatment facilities would be potentially significant.

As final design locations and specifications are not yet available for the pump stations or treatment facilities, it cannot be determined if operation of these facilities would generate substantial vibration at nearby sensitive receptors at a program-level analysis and, therefore, impacts would be considered potentially significant.

Finding: Incorporation of Mitigation Framework measures MM-NOI-1 and MM-NOI-2 would reduce potential impacts related to noise generation to below a level of significance.

Facts in Support of Finding: Implementation of Mitigation Framework measure MM-NOI-1 would be required to ensure noise impacts related to Program construction would be reduced to below a level of significance. MM-NOI-1 requires that from a construction stand point, project-level environmental analyses shall evaluate noise impacts of subsequent project-specific features. The City of San Diego shall incorporate and/or modify and augment facility design as appropriate to address project-specific noise effects (e.g., nighttime construction equipment regulations and use electrically powered equipment where feasible).

Additionally, the implementation of Mitigation Framework measure MM-NOI-2 would be required to ensure that potential noise impacts associated with the operation of treatment facilities would be reduced to below a level of significance. MM-NOI-2 requires subsequent Program components shall be evaluated by the City of San Diego at the project-specific environmental/design phase to determine if potential noise or groundborne vibration impacts in excess of applicable noise or vibration standards would result. A site-specific acoustical analysis shall be required for any project located within 500 feet of any residential dwellings, which would ensure compliance with construction noise and outdoor noise standards.

Incorporation of Mitigation Framework measures MM-NOI-1 and MM-NOI-2 would reduce the potential for significant impacts at the Program-level to below a level of significance.

18) Historical Resources (Loss of Historical Resources)

Impact: In total, 1,236 archaeological and 1,257 historic built-environment resources (e.g., addresses) have been previously recorded within the Program study area. South Coastal Information System records indicate that approximately 19% (30.92 square miles) of the study area has been included as part of one or more previous archaeological or built-environment technical studies and the remaining 81% (131.63 square miles) appear to have not been subject to previous investigation. Due to the presence of archaeological and historic built-environment resources in the study area and because construction of Program components would entail ground-disturbing activities, impacts to archaeological and historic built-environment resources are considered potentially significant.

Finding: Incorporation of Mitigation Framework measures MM-LU-2, MM-HIST-1 and MM-HIST-2 would reduce potential impacts to unknown subsurface archaeological resources and historic built environment resources to below a level of significance.

Facts in Support of Finding: MM-LU-2 requires subsequent project components implemented in accordance with the Program would be subject to discretionary review and further environmental review under CEQA and shall be reviewed in accordance with Mitigation Framework measures MM-HIST-1 and MM-HIST-2.

With regards to archaeological resources, MM-HIST-1 requires that prior to issuance of any permit for future development project implemented in accordance with the Program area that could directly affect and archaeological resource, the City shall require a methodical step-by-step process to determine: (1) the presence of archaeological resources and (2) the appropriate mitigation for any significant resources which may be impacted by a development activity.

Similarly with regards to historic buildings, structures, and objects, MM-HIST-2 requires that prior to issuance of any permit for a future development project implemented in accordance with the Program that would directly or indirectly affect a building/structure in excess of 45 years of age, the City shall determine whether the affected building/structure is historically significant. Preferred mitigation for historic buildings or structures shall be to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm to the resource shall be taken.

Incorporation of Mitigation Framework measures MM-LU-2, MM-HIST-1 and MM-HIST-2 would reduce the potential for significant impacts at the Program-level to below a level of significance.

19) Historical Resources (Disturbance of Human Remains)

Impact: Avoiding impacts on religious or sacred places or human remains may be unavoidable in certain circumstances when resources are discovered during construction. Although there are no known religious or sacred uses within the Program area, there is potential for these to be encountered during future construction activities associated with implementation of the Program, particularly given the high cultural sensitivity of areas within the study area, such as areas along waterways, where prehistoric resources are most likely to be found. There are areas reported within the 1-mile South Coastal Information System records search buffer where known human remains are reported to be interred outside of formal cemeteries. Additionally, previously unknown prehistoric human remains and prehistoric sites have been uncovered within the City during both archaeological investigations and grading activities. Therefore, the potential for encountering human remains during construction activities is also possible. Thus, significant impacts on religious or sacred uses or human remains may occur as a result of future projects implemented in accordance with the Program.

Finding: Incorporation of Mitigation Framework measure MM-HIST-1 would reduce potential impacts related to the disturbance of human remains to below a level of significance.

Facts in Support of Finding: In the event that human remains are encountered during data recovery and/or a monitoring program, the provisions of Public Resources Code Section 5097 must be followed. In the event that human remains are discovered during project grading, work shall halt in that area and

the procedures set forth in the California Public Resources Code (Section 50987.98) and State Health and Safety Code (Section 7050.5), and other applicable federal, state, and local regulations shall be adhered to. Any human bones and associated grave goods of Native American origin shall be turned over to the appropriate Native American group for repatriation.

Incorporation of Mitigation Framework measure MM-HIST-1 would reduce the potential for significant impacts at the Program-level to below a level of significance.

20) Hydrology and Water Quality (Runoff Impacts)

Impact: Proposed Program components that would create additional impervious surfaces or are located within a water quality sensitive area would result in potentially significant impacts.

Proposed Program components located within or immediately adjacent to a 100-year special flood hazard area could result in a significant impact related to facility flooding. Therefore, impacts are potentially significant.

Finding: Incorporation of Mitigation Framework measures MM-HYD-1 and MM-HYD-2 would reduce potential impacts associated with increases in impervious surfaces and alteration of drainage patterns to below a level of significance. Incorporation of Mitigation Framework measure MM-HYD-3 would reduce potential impacts related to flood hazards to below a level of significance.

Facts in Support of Finding: In order to reduce runoff impacts, MM-HYD-1 requires that during construction of all Program components, the City shall comply with the current State Water Resources Control Board (SWRCB) construction general permit (Order Number 2009-009-DWQ, as amended) and the City's Storm Water Management and Discharge Control Ordinance (San Diego Municipal Code 43.0301 et seq.). In compliance with these requirements, a water pollution control plan (for land disturbances of less than 1 acre) or a stormwater prevention plan (for land disturbances of greater than 1 acre) shall be prepared identifying stormwater best management practices (BMPs) to be implemented as appropriate for site conditions and receiving water risk.

Additionally, MM-HYD-2 requires Program components shall be designed to comply with the City's Storm Water Standards manual and the Municipal Stormwater Permit (San Diego RWQCB Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100, and other future amendments), including implementation of source control BMPs, and Low Impact Development features that are appropriate for site conditions and adequately sized to meet site's design capture volume for stormwater.

Lastly, MM-HYD-3 requires proposed Program facilities located within a 100-year flood hazard area shall be located and designed in a manner that protects

proposed facilities from flooding (e.g., elevated above the 100-year flood or flood-proofed) and does not alter the boundaries or depth of the existing floodplain for off-site properties as mapped by the Federal Emergency Management Agency and the County.

With the implementation of these criteria under MM-HYD-1 through MM-HYD-3 the impacts as a result of runoff would be reduced to below a level of significance.

21) Hydrology and Water Quality (Changes to Surface/Ground Water Quality)

Impact: With the implementation of the Program, changes to surface and ground water quality could occur. From a construction standpoint, there are two typical ways that construction activities associated with the proposed Program could adversely affect stormwater quality, through land disturbance and spills or leaks of construction materials. From an operational standpoint, although the proposed treatment, pumping and conveyance facilities do not involve physical modification to the City's ocean outfalls, the Program would involve modifications to the NCWRP, SBWRP, and PLWTP. Therefore, impacts would be potentially significant.

Impacts associated with fail safe disposal would only occur in emergency situations and would be temporary in nature. However, impacts would be potentially significant.

Finding: Incorporation of Mitigation Framework measure MM-HYD-4 would be reduce potentially significant impacts related to stormwater and non-stormwater discharges during construction to below a level of significance. Incorporation of Mitigation Framework measure MM-HYD-5, would be reduce potentially significant impacts to water quality associated with fail safe disposal to below a level of significance.

Facts in Support of Finding: Prior to issuance of any permit that would allow excavation which requires dewatering, MM-HYD-4 requires a plan for disposal of the dewatering effluent shall be prepared. If groundwater is to be discharged to the sanitary sewer system, such discharges shall be made by permit/approval from the Industrial Waste Division of the City of San Diego Public Utilities Department. If groundwater is to be discharged to land, the stormwater drainage system, or a surface water body, such discharge shall be made in coordination with the San Diego RWQCB and the appropriate flood control district, and in accordance with applicable waste discharge requirements. Additionally, MM-HYD-5 requires that during project-level review for the proposed treatment and conveyance facilities, the City shall prepare and submit a Failsafe Disposal Plan and submit it to the SWRCB Division of Drinking Water and San Diego RWQCB for review and approval.

Implementation of the Program would ultimately decrease the volume of water needing to be discharged through the Point Loma Ocean Outfall and the South Bay Ocean Outfall by diverting some of the treated wastewater to the AWPFs. With a decrease in volume needed to be discharged through the ocean outfalls, the Program would not result in substantial adverse effects on ocean water quality.

Impacts associated with stormwater and non-stormwater discharges during construction of Program components would be adequately addressed through compliance with the SWRCB Construction General Permit (Order Number 98-672009-009-DWQ, as amended), the City's Storm Water Runoff and Drainage Regulations (Code of Ordinances Chapter 14, Article 2, Division 2), and required notification procedures and waste discharge requirements.

With a decrease in volume needed to be discharged through the ocean outfalls, the Program would have a beneficial impact with respect to treated wastewater disposal through the Point Loma Ocean Outfall and the South Bay Ocean Outfall.

Incorporation of MM-HYD-4 and MM-HYD-5 would reduce the potential for significant impacts at the Program-level to below a level of significance.

22) Hydrology and Water Quality (Cumulative Impacts)

Impact: The cumulative effects of past and current projects in the cumulative scenario have resulted in substantial water quality problems in the region's major waterways, and because water quality problems are generally cumulative in nature, all efforts must be made to reduce pollutant concentrations within stormwater discharges to the maximum extent practicable, even if the impact of an individual project appears inconsequential. The NPDES permits required for the Program are aimed at maintaining the beneficial uses of the water bodies in the RWQCB Basin Plan and meeting water quality objectives associated with specific pollutants of concern. Because adverse water quality and major hydrologic alterations are linked to the large-scale, cumulative effects of development projects, as well as industrial and/or agricultural land uses, the provisions within the NPDES permits, by their nature, seek to address cumulative conditions. Therefore, impacts would be potentially significant.

Finding: Incorporation of Mitigation Framework measures MM-HYD-1 through MM-HYD-5 would reduce potential cumulatively significant water quality impacts to below a level of significance.

Facts in Support of Finding: The Mitigation Framework measures are designed to address cumulative water quality issues by reducing to the maximum extent practicable the levels of pollutants entering the storm drain system. Among other things, compliance with the City's Storm Water Standards manual requires identification of impaired water bodies and implementation of strict controls to ensure construction and operation does not contribute pollutants for which the water body is impaired.

In order to reduce runoff impacts, MM-HYD-1 requires that during construction of all Program components, the City shall comply with the current SWRCB construction general permit (Order Number 2009-009-DWQ, as amended) and the City's Storm Water Management and Discharge Control Ordinance (San Diego Municipal Code 43.0301 et seq.). In compliance with these requirements, a water pollution control plan (for land disturbances of less than 1 acre) or a stormwater pollution prevention plan (for land disturbances of greater than 1 acre) shall be prepared identifying stormwater BMPs to be implemented as appropriate for site conditions and receiving water risk.

Additionally, MM-HYD-2 requires Program components shall be designed to comply with the City's Storm Water Standards manual and the Municipal Stormwater Permit (San Diego RWQCB Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100, and other future amendments), including implementation of source control BMPs, and LID features that are appropriate for site conditions and adequately sized to meet site's design capture volume for stormwater.

Lastly, MM-HYD-3 requires proposed Program facilities located within a 100-year flood hazard area shall be located and designed in a manner that protects proposed facilities from flooding (e.g., elevated above the 100-year flood or flood-proofed) and does not alter the boundaries or depth of the existing floodplain for off-site properties as mapped by the Federal Emergency Management Agency and the County.

Prior to issuance of any permit that would allow excavation which requires dewatering, MM-HYD-4 requires a plan for disposal of the dewatering effluent shall be prepared. If groundwater is to be discharged to the sanitary sewer system, such discharges shall be made by permit/approval from the Industrial Waste Division of the City of San Diego Public Utilities Department. If groundwater is to be discharged to land, the stormwater drainage system, or a surface water body, such discharge shall be made in coordination with the San Diego RWQCB and the appropriate flood control district, and in accordance with applicable waste discharge requirements. Additionally, MM-HYD-5 requires that during project-level review for the proposed treatment and conveyance facilities, the City shall prepare and submit a Failsafe Disposal Plan and submit it to the SWRCB Division of Drinking Water and San Diego RWQCB for review and approval.

Program compliance with the Construction General Permit, the Municipal Stormwater Permit and the incorporation of MM-HYD-1 through MM-HYD-5 would reduce the potential for significant Program-level to below a level of significance.

23) Paleontological Resources (Loss of Paleontological Resources)

Impact: According to the conceptual siting and alignments of the Program components, the following moderate or high resource potential areas may be affected: Friars Formation (Tf), Mission Valley Formation (Tmv), Otay Formation (To), Stadium Conglomerate (Tst), Point Loma Formation (Kp), Cabrillo Formation (Kcs), San Diego Formation (Tsd), and Ardath Shale (Ta). While these areas may be affected according to the current conceptual alignments, site-specific locations and design are not yet known and subject to change. As final design, location, and excavation quantities are not yet known and are subject to change prior to future project-level analysis, for the purposes of this program-level analysis, impacts to paleontological resources would be potentially significant.

Finding: Incorporation of the Mitigation Framework measure MM-PALEO-1 would reduce potential impacts to paleontological resources to below a level of significance.

Facts in Support of Finding: Prior to the approval of subsequent development projects implemented in accordance with the Program areas, MM-PALEO-1 requires the City shall determine the potential for impacts to paleontological resources based on review of the project application submitted, and recommendations of a project-level analysis completed in accordance with the steps detailed in MM-PALEO-1. Future projects shall be sited and designed to minimize impacts on paleontological resources in accordance with the City's Paleontological Resources Guidelines and CEQA Significance Thresholds.

Incorporation of Mitigation Framework measure MM-PALEO-1 would reduce the potential for significant impacts at the Program-level to below a level of significance.

24) Public Utilities (Generation of Solid Waste)

Impact: Per the City's Significance Determination Thresholds projects that generate more than 1,500 tons of waste may result in a direct impact. The construction of Program components would generate demolition and construction debris which could exceed the threshold, and therefore, impacts would be potentially significant.

Sludge facilities would be improved, or new facilities constructed, as part of the Program and would provide sufficient capacity to process sludge generated by the WRPs and AWPFs. The impacts associated with improvements at PLWTP and Metropolitan Biosolids Center and the construction of the South Bay Sludge Processing Facility are addressed throughout this PEIR. Nonetheless, additional sludge would be produced by the Program, resulting in a potentially significant impact.

Per the City's Significance Determination Thresholds projects that generate more than 1,500 tons of waste may result in a direct impact. The ongoing generation of solid waste such as filter cartridges, reverse osmosis (RO) membrane elements, ultraviolet (UV) reactor lamps, and ballasts associated with operation of the proposed facilities would result in a potentially significant impact.

Finding: Incorporation of Mitigation Framework measures MM-PU-1and MM-PU-2 would reduce potentially significant solid waste impacts to below a level of significance.

Facts in Support of Finding: During construction, MM-PU-1 requires the construction contractor shall comply with the Standard Specifications for Public Work Construction (aka "THE WHITEBOOK"), Section 702, which sets forth the requirements for construction and demolition waste management, and 90% waste reduction during demolition and 75% waste reduction during construction. Additionally, during operation, MM-PU-2 requires the City shall manage solid waste to ensure a minimum 75% waste diversion through source reduction, recycling, composting, or transformation.

Incorporation of MM-PU-1 and MM-PU-2 would reduce the potential for significant impacts at the Program-level to below a level of significance.

25) Visual Effects and Neighborhood Character (Landform Alteration)

Impact: The expansion of existing facilities and construction of pipelines is not expected to require or result in substantial changes to existing topography. Therefore, impacts associated with this portion of Program implementation would be less than significant. While the preliminary sites chosen for the new treatment facilities and pump stations are relatively flat, disturbed, and/or developed, these sites are subject to change prior to final design. Additionally, grading plans for each site are not yet developed and would not be known until future project-level analysis. Therefore, impacts associated with the development of treatment facilities and pump stations would be potentially significant.

Finding: Incorporation of Mitigation Framework measure MM-AES-1 would reduce the potentially significant landform alteration impacts to below a level of significance.

Facts in Support of Finding: MM-AES-1 requires the City shall minimize and limit potential for substantial landform alteration by avoiding steep slopes where feasible during the selection of sites for treatment facilities and pump stations. In the event that a chosen site contains steep slopes as defined by the City of San Diego Municipal Code, the treatment facility or pump station shall be designed to avoid or disturb steep hillsides or design development within the allowable encroachment in accordance with the City of San Diego Land Development Code, Environmentally Sensitive Land

Regulations. Lastly, final grading plans for each treatment facility and pump station shall minimize alterations to existing topography and mimic existing topography to the extent feasible.

Incorporation of Mitigation Framework measure MM-AES-1 would reduce the potential for significant impacts at the Program-level to below a level of significance.

26) Visual Effects and Neighborhood Character (Impacts to Scenic Vistas)

Impact: The expansion of existing facilities and construction of pipelines is not expected to require or result in substantial blockage of public views or views of important visual resources. Therefore, impacts associated with this portion of Program implementation would be less than significant.

While the majority of the chosen sites would likely not result in substantial view blockage, at this program level of analysis, it is not possible to fully analyze the potential for effects on scenic vistas. More importantly, the currently proposed sites are conceptual and preliminary, and are still subject to engineering design and analysis in conjunction with more detailed facility planning and design. It is possible that the more detailed planning and design would require shifting of the site layout such that development of any given treatment facility or pump station would result in substantial blockage of public views and important visual resources. Therefore, impacts would be potentially significant.

Finding: Incorporation of Mitigation Framework measure MM-AES-2 would reduce potentially significant impacts to scenic vistas to below a level of significance.

Facts in Support of Finding: During future project-level analysis, MM-AES-2 requires the City shall analyze and determine the potential for Program components to block public scenic views or views of important visual resources. The City shall make necessary alterations to the site design to minimize such impacts as necessary, prior to final design, and to the satisfaction of the City's Planning Department.

Incorporation of Mitigation Framework measure MM-AES-2 would reduce the potential for significant impacts at the Program-level to below a level of significance.

27) Visual Effects and Neighborhood Character (Alteration to Visual Character)

Impact: The expansion of existing facilities and pipelines would not have a substantial effect on visual character and impacts would be less than significant.

It is not possible to fully determine the extent of potential visual character, lighting and glare effects until final site design and engineering for future project-level analysis. Additionally, the sites chosen are preliminary and conceptual and are subject to change prior to project-level review, which may result in a different specific existing visual environment than described in this section. Therefore, any given treatment facility and pump station may result in the substantial alteration of visual character and a potentially significant impact.

Finding: Incorporation of Mitigation Framework measure MM-AES-3 would reduce potentially significant impacts to visual character to below a level of significance.

Facts in Support of Finding: Prior to final design, MM-AES-3 requires that subsequent projects implemented in accordance with the Program shall incorporate setbacks from the property line to minimize apparent bulk, scale, and mass of structures, nonreflective exterior finished that do not substantially contrast with the existing surrounding natural and built environment, landscaping consistent with the existing surroundings to provide for visual screening and softening of views and structures, use of lighting only as necessary for nighttime security purposed, and use of lighting that is shielded and directed downward and away from neighboring property lines.

Incorporation of Mitigation Framework measure MM-AES-3 would reduce the potential for significant impacts at the Program-level to below a level of significance.

28) Geology and Soils (Exposure to Geological Hazards)

Impact: The Program would be located in the San Diego Region of seismically active Southern California. Bases on conceptual alignments of the Program, there is potential for segments of pipeline alignments to be located within an Alquist-Priolo Earthquake Fault Zone. As such the program would be subject to earthquakes similar to that of the entire region. The Program components may be locally subject to seismically induced secondary effects related to liquefaction, lateral spreading, local subsidence of soil, landslides, mudslides, ground failure, and other geological hazards. The potential for these conditions and susceptibility to such hazards would depend on site-specific conditions that would not be known until future project-level analysis is conducted.

The Program areas contain geologic conditions which would pose significant risks for construction of facilities and associated components if not properly addressed at the project-level. Unstable conditions relating to earthquakes, landslides, mudslides, liquefaction, ground failure and other similar hazards represent a potentially significant impact for future development, and mitigation is required.

Finding: Incorporation of Mitigation Framework measure MM-GEO-1 would reduce potential impacts related to geologic hazards to below a level of significance.

Facts in Support of Finding: Impacts associated with geologic hazards shall be mitigated at the project-level through adherence to the City's Seismic Safety Study and recommendations of a site-specific geotechnical report prepared in accordance with the City's Geotechnical Report Guidelines, as required by MM-GEO-1. Impacts shall also be avoided or reduced through engineering design that meets or exceeds adherence to the City's Municipal Code and the California Building Code.

Specific compressible soil impacts shall be mitigated through the removal of undocumented fill, colluvium/topsoil, and alluvium to firm the ground. Regarding expansive soils, future development shall be required to implement typical remediation measure, which shall include placing a minimum 5-foot cap of low expansive over the clays.

Incorporation of Mitigation Framework measure MM-GEO-1 would reduce the potential for significant impacts at the Program-level to below a level of significance.

29) Geology and Soils (Increased Erosion)

Impact: The potential for an increase in erosion of soils on or off site would occur during both the construction and operation phases of the Program. Construction of the treatment facilities, pump stations, and pipelines would temporarily expose soils to wind and water erosion. Therefore, impacts would be potentially significant. Based on the steep nature of many of the hillsides and the generally poorly consolidated nature of the sedimentary materials and soils found throughout the Program area, erosion would represent a potentially significant impact, particularly in conjunction with some portions of the San Diego Formation and in drainages and stream valleys. Therefore, impacts would be potentially significant.

Finding: Incorporation of Mitigation Framework measure MM-GEO-2 would reduce potential impacts related to erosion to below a level of significance.

Facts in Support of Finding: Regardless of final location of Program components, construction of Program components would be required to comply with the SWRCB's Construction General Permit, which requires the development and implementation of a Stormwater Pollution Prevention Plan as well as implementation of BMPs. Construction would also be required to comply with all applicable jurisdictions' grading requirements, which would minimize erosion during construction. Common BMPs include site watering, sediment filters, and specific materials handling and storage.

MM-GEO-2 requires all subsequent projects implemented in accordance with the Program shall be designed to avoid or reduce geologic hazards to the satisfaction of the City Engineer. Submittal, review, and approval of site specific geotechnical investigations shall be completed in accordance with the City's Municipal Code requirements. Engineering design specifications based on future project-level construction plans shall be incorporated into all future projects implemented in accordance with the Program to minimize hazards associated with site-level geologic and seismic conditions satisfactory to the City Engineer and shall include the measures depicted in detail under MM-GEO-2 to control erosion during and after grading or construction.

Compliance with the SWRCB's Construction General Permit and incorporation of Mitigation Framework measure MM-GEO-2 would reduce the potential for significant impacts at the Program-level to below a level of significance.

30) Geology and Soils (Unstable Geological Conditions)

Impact: The Program components may be located on a geological unit or soil that is unstable or would result in landslides, lateral spreading, subsidence, liquefaction, or collapse. The potential for these conditions and susceptibility to such hazards would depend on site specific conditions that would not be known until future project-level analysis can be conducted. Therefore, impacts are potentially significant.

The Program areas contain geologic conditions which would pose significant risks for construction of facilities and associated components if not properly addressed at the project-level. Unstable conditions relating to landslides, lateral spreading, subsidence, liquefaction or collapse represent a potentially significant impact for future development. Therefore, impacts are potentially significant.

Finding: Incorporation of Mitigation Framework measure MM-GEO-1 would reduce potential impacts related to geologic hazards to a level below significance.

Facts in Support of Finding: : Impacts associated with unstable geological conditions shall be mitigated at the project-level through adherence to the City's Seismic Safety Study and recommendations of a site-specific geotechnical report prepared in accordance with the City's Geotechnical Report Guidelines, as required by MM-GEO-1. Impacts shall also be avoided or reduced through engineering design that meets or exceeds adherence to the City's Municipal Code and the California Building Code.

Specific compressible soil impacts shall be mitigated through the removal of undocumented fill, colluvium/topsoil, and alluvium to firm the ground. Regarding expansive soils, future development shall be required to implement typical remediation measure, which shall include placing a minimum 5-foot cap of low expansive over the clays.

Incorporation of Mitigation Framework measure MM-GEO-1 would reduce the potential for significant impacts at the Program-level to below a level of significance.

31) <u>Transportation, Circulation, and Parking (Alteration to Circulation)</u>

Impact: The majority of the pipeline alignments would be constructed using open trench construction techniques. Therefore, construction of pipelines would require encroachment onto public right-of-way at different times throughout the construction phase of each program component. Construction and staging of equipment for the treatment facilities and pump stations of each Program component would likely be limited to each respective site. However, construction of treatment facilities and pump stations may require temporary encroachment onto public rights-of-way and roadways for ingress/egress of workers and equipment. Therefore, impacts would be potentially significant.

Finding: Incorporation of Mitigation Framework measure MM-TRA-1 would reduce potentially significant impacts to vehicle movement and access to roadways to below a level of significance.

Facts in Support of Finding: Prior to construction of any project that requires encroachment into public roadways, a traffic control plan would be prepared by the City in conformance with the City's and each affected municipality's traffic control regulations. The traffic control plan would be prepared to ensure that vehicular, bicycle, and pedestrian access would be maintained to individual properties and businesses, and that emergency access would not be restricted. Construction of pipelines, pump stations, and treatment facilities may temporarily result in disrupted access along roadways, resulting in a potentially significant impact related to construction traffic.

Additionally, MM-TRA-1 requires that the construction contractor shall provide a minimum 2-week written notice by mail to owners/occupants along streets to be impacted during construction. During construction, the construction contractor shall ensure continuous, unobstructed, safe, and adequate pedestrian and vehicular access to and from public facilities, commercial/industrial establishments during regular business hours, and residential driveways from the public street to the private property line, except where necessary construction precludes such continuous access for reasonable periods of time.

Compliance with the prepared traffic control plan and incorporation of Mitigation Framework measure MM-TRA-1 would reduce the potential for significant impacts at the Program-level to below a level of significance.

B. Findings Regarding Impacts that Are Unavoidable

No impacts related to the implementation of the Program were found to be significant and unavoidable.

V. FINDINGS REGARDING ALTERNATIVES

In accordance with Section 15126.6(a) of the Guidelines, an environmental impact report (EIR) must contain a discussion of "a range of reasonable alternatives to a project, or the location of a project, 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." Section 15126.6(f) further states that "the range of alternatives in an EIR is governed by the 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice." Thus, the following discussion focuses on Program alternatives that are capable of eliminating significant environmental impacts or substantially reducing them as compared to the proposed Program, even if the alternative would impede the attainment of some Program objectives, or would be more costly. In accordance with Section 15126.6(f)(1) of the Guidelines, among the factors that may be taken into account when addressing the feasibility of alternatives are: (1) site suitability; (2) economic viability; (3) availability of infrastructure; (4) general plan consistency; (5) other plans or regulatory limitations; (6) jurisdictional boundaries; and (7) whether the proponent can reasonably acquire, control or otherwise have access to the alternative site.

As required in Section 15126.6(a), in developing the alternatives to be addressed in this section, consideration was given to an alternative's ability to meet most of the basic objectives of the project. Because the Pure Water Program will cause potentially significant environmental effects unless mitigated, the City must consider the feasibility of any environmentally superior alternatives to the Program, evaluating whether these alternatives could avoid or substantially lessen the potentially significant environmental effects while achieving most of the objectives of the proposed Program.

A. Alternatives Eliminated from Detailed Consideration

Over the past decade or more, the City has engaged in an extensive and deliberate process to consider water supply portfolio options generally, and water reuse options specifically. Through those processes, a variety of alternative concepts for water supply and reuse were evaluated, and as a result, the Program was developed. The various options and concepts that were included among those studies and evaluation processes are alternatives that were considered and rejected. Included among those are alternatives relating to increasing non-potable recycled water use and updating PLWTP to full secondary treatment, both of which were considered and rejected in the Water Reuse Study and the Recycled Water Study.

B. Alternatives under Consideration

The final PEIR analyzes the following alternatives:

1. No Program/No Build Alternative

CEQA Guidelines, Section 15126.6(e), requires that an EIR evaluate a "no project" alternative along with its impact. The purpose of describing and analyzing a no project alternative is to allow a lead agency to compare the impacts of approving the project to the impacts of not approving it.

Under the No Program/No Build Alternative, the Program would not be implemented. The three AWPFs, the CAWRP in the Central Area, and the associated pumping and conveyance facilities would not be constructed. Therefore, 83 MGD of purified water would not be produced. Instead, potable water demand would continue to be met through imported water supplies. In addition, current levels of wastewater flows would continue to the PLWTP, and the PLWTP would continue operating under a modified permit.

Under this alternative, none of the environmental impacts associated with the construction and operation of the Program would occur. Beneficial impacts of the proposed Program would not occur. Additionally, under this alternative, the City would continue to purchase imported water to meet local demand, which would result in higher net energy use and associated GHG emissions. This alternative does not meet any of the objectives set forth earlier in this report.

2. Post Office Site Alternative

The City identified an additional potentially feasible alternative location for a treatment facility that could provide an alternative to the CAWRP and CAAWPF. The Post Office Site Alternative is so named becauseit is located at the former site of the U.S. Post Office on the west side of Midway Drive, north of Barnett Avenue and south of Rosecrans Street.

Zoning and land use designations for the site allow for a mix of light industrial/office uses. However, although the Post Office alternative site is located in close proximity to the South and North Metro Interceptor sewer lines, diverting wastewater from these interceptors would require a deep diversion structure (more than 30 feet below ground surface). Alternatively, an influent pump station could be located near Pump Station No. 2, which would require a pipeline to traverse property near the west end of the airport and runway. Additional disadvantages of the site include highly liquefiable and

compressible soil – subject to liquefaction and seismically induced settlement; high groundwater table (approximately 5 to 8 feet below ground surface); and the fact that the site is prone to flooding during major rain events.

Impacts related to land use, air quality and odor, health and safety, biological resources, noise, historical resources, hydrology and water quality, paleontological resources, public utilities, visual effects and neighborhood character, energy, geology and soils, transportation, circulation and parking, public services, GHG emissions, and water supply with regards to this alternative would be similar to those of the proposed Program. This alternative would also meet all the previously discussed Program objectives. However, although all the Program objectives are met, this alternative does not provide any benefits in terms of reducing significant environmental impacts that could not otherwise be reduced to less than significant with mitigation under the proposed Program.

3. Alternate Reservoir Augmentation Alternative

Under this alternative, water purified at the NCAWPF would be conveyed to the Miramar Reservoir and water purified at the CAAWPF would be conveyed to Lake Murray, where it would be stored prior to treatment at a water treatment facility. Water purified at the South Bay Advanced Water Purification Facility would be conveyed to a more southern location at the Otay Reservoir avoiding the additional costs and impacts associated with construction of the pipeline to the northern portion of the reservoir. Under this alternative, an additional treatment step using ozone-biological activated carbon would be included in the advanced water purification process. This additional treatment step would be implemented prior to microfiltration or ultrafiltration and RO in order to increase cumulative log removals of pathogens and chemicals of emerging concerns and to improve the water quality of the product water, thereby alleviating the need for the additional environmental buffer that is associated with the use of the larger San Vicente Reservoir, and for the Otay Reservoir a larger separation between product water delivery and withdrawal points.

Utilizing Miramar Reservoir and Lake Murray for storage of purified water would substantially reduce the miles of purified water pipeline needing to be constructed from the NCAWPF and CAAWPF. The Miramar Reservoir is owned and operated by the City of San Diego and is located in the Scripps Ranch Community. Lake Murray is also owned and operated by the City and is located within Mission Trails Regional Park, in the Navajo Community Planning Area.

The Alternate Reservoir Augmentation alternative would result in similar impacts related to land use, health and safety, public utilities, visual effects and neighborhood character, product water quality, geology and soils, public services, and water supply as the proposed Program. The additional treatment requirements at the AWPFs would result in slightly higher energy consumption and associated GHG emissions; however, the shortened purified water pipeline length would result in a net overall reduction in energy consumption and associated GHG emissions. Impacts related to air quality, biological resources, noise, historical resources, hydrology and water quality, paleontological resources, and transportation would be slightly reduced under this alternative. Additionally, this alternative would meet all of the Program objectives. Therefore, it is considered the environmentally superior alternative.