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Wastewater Management Plan
Draft Supplemental PEIR

DRAFT

April 2013

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CHAPTER 1.0
INTRODUCTION

1.1 Project Background

The Otay Water District (OWD) was authorized as a California Special District by the State Legislature in 1956, under the provisions of the Municipal Water District Law of 1911, and thereby gained its entitlement to imported water. As a member agency of the San Diego County Water Authority (SDCWA), the OWD purchases all of the potable water that it delivers from the SDCWA. The SDCWA is responsible for transmission of the imported water supply within San Diego County to its member agencies, and is itself a member of the Metropolitan Water District of Southern California.

In 2002, the OWD developed a comprehensive Water Resources Master Plan (WRMP) that combined all previously existing master plans and facility plans into one system-wide plan outlining the Capital Improvement Program (CIP) projects required to serve their customers. The following three phases were identified in the 2002 WRMP: Phase I (2002-2006), Phase II (2007-2016), and Phase III (2017-2030).

The 2009 WRMP Update revised the OWD's 2002 WRMP; identifying the potable and recycled water CIP facilities (e.g., pump stations, storage reservoirs, transmission mains), and associated probable cost estimates, to meet projected water market demands within the OWD planning area and adjacent areas of influence; and developed a phased approach to implement the CIP projects during the following time frames: 2009-2016 (Phase II) and 2017-Ultimate (Phase III).

The purpose of the 2012 WRMP Update [Wastewater Management Plan (WWMP)] is to expand on the 2009 WRMP Update to include planning for future wastewater collection system and treatment needs. The CIP projects associated with wastewater transmission and treatment parallel and supplement those projects included and analyzed in the 2009 WRMP Update.

1.2 Intended Use and Purpose of the Supplemental Program Environmental Impact Report (SPEIR)

One of the purposes of a "Program" EIR is to provide a basis for tiering environmental documents that address subsequent activities, pursuant to CEQA Guidelines Sections 15152 and 15168(c). CEQA Guidelines Section 15168(c)(5) states, "A program EIR would be most helpful in dealing with subsequent activities if it deals with the effects of the program as specifically and comprehensively as possible. With a good and detailed analysis of the program, many subsequent activities could be found to be within the scope of the project described in the program EIR, and no further environmental documents would be required."

This SPEIR analyzes proposed (near-term; Phase II) and subsequent (long-term; Phase III) activities associated with implementation of the 2012 WRMP Update that differ from the 2009 WRMP Update. Adoption of the WRMP Update or certification of the SPEIR does not constitute a commitment to any specific CIP project or activity, construction schedule, or funding priority. Furthermore, inclusion of any conceptual plans, studies, or potential construction assumptions in this SPEIR does not constitute a commitment to such plans, studies, or assumptions. Any inconsistencies between future CIP projects or activities and conceptual plans, studies, or potential construction assumptions considered in this SPEIR

would not preclude the environmental documentation prepared for the subsequent projects or activities from tiering from this SPEIR. Such inconsistencies merely indicate that the future CIP projects or activities may not be entirely within the scope of this SPEIR, and additional analyses may be required.

The SPEIR process and the information it generates will be used for the following purposes:

- To give government officials and the community the opportunity to provide input into the decision-making process;
- To provide agencies with information necessary for them to determine if they have jurisdiction over some aspect of WRMP implementation, and, if so, to identify permitting requirements;
- To identify a range of reasonable and practicable alternatives;
- To inform the public as well as the decision makers of the environmental consequences of WRMP WWMP implementation and its alternatives and to assist agency officials in making decisions and taking actions to protect, restore, and enhance the environment;
- To assist the community in understanding the expected environmental effects and how decision- makers plan to respond to and mitigate these effects; and
- To develop mitigation measures that would reduce or eliminate the potential for environmental, public health, and safety impacts.

Subsequent environmental documents for future CIP projects that implement the 2012 WRMP Update would tier from this SPEIR, and may include Addendums, Initial Studies, Negative Declarations, Mitigated Negative Declarations, and Subsequent or Supplemental EIRs. As discussed in CEQA Guidelines Section 15152, "tiering" refers to using the analysis of general matters contained in a broader EIR with later EIRs. Tiering is accomplished by incorporating by reference the general discussions from broader EIRs. Tiering allows the subsequent environmental document to focus on those issues most relevant to its preparation.

According to CEQA Guidelines Section 15168 (c), the environmental review process for implementation of CIP projects identified in the 2012 WRMP Update WWMP should proceed along the following sequence.

> Subsequent activities in the program must be examined in the light of the Draft Supplemental Program EIR to determine whether an additional environmental document must be prepared.
>
> 1) If a later activity would have effects that were not examined in the Draft Supplemental Program EIR, a new Initial Study would need to be prepared leading to either an EIR or a Negative Declaration.
> 2) If the lead agency finds that pursuant to Section 15162, no new effects could occur or no new mitigation measures would be required, the agency can approve the activity as being within the scope of the project covered by the Draft Supplemental Program EIR, and no new environmental document would be required.
> 3) An agency shall incorporate feasible mitigation measures and alternatives developed in the Supplemental Program EIR into subsequent actions in the program.
> 4) Where the subsequent activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and

> the activity to determine whether the environmental effects of the operation were covered in the Supplemental Program EIR.

CEQA Guidelines Section 15168(d) describes the CEQA review process steps for subsequent implementation projects as follows:

> A Supplemental Program EIR can be used to simplify the task of preparing environmental documents on later parts of the program. The Program EIR and the subsequent Supplemental Program EIR can:
>
> 1) Provide the basis in an Initial Study for determining whether the later activity may have any significant effects.
> 2) Be incorporated by reference to deal with regional influences, secondary effects, cumulative impacts, broad alternatives, and other factors that apply to the program as a whole.
> 3) Focus an EIR on a subsequent project to permit discussion solely of new effects, which had not been previously considered.

1.3 CEQA Requirements

The SPEIR complies with the criteria, standards, and procedures of the CEQA and the State CEQA Guidelines (California Administrative Code, Section 15000, et seq.). The OWD is the Lead Agency for the preparation of this SPEIR, as defined in CEQA Guidelines §15367.

1.3.1 Notice of Preparation/Scoping Process

Scoping is the process followed to ensure that the germane environmental concerns of individuals, organizations, and agencies about a proposed project are adequately addressed within the project's environmental document. Scoping is an integral part of the CEQA process because it allows interested parties to participate directly in the preparation of the environmental document, and to identify significant environmental effects and alternatives.

To initiate the public scoping process for this SPEIR in accordance with CEQA, the OWD circulated a Notice of Preparation (NOP) through direct mailings and published a legal notice in the San Diego Union Tribune on July 16, 2012. The 30-day public review period for the NOP ended August 15, 2012. A total of five comment letters were received during the NOP public scoping period.

A public scoping meeting was held at the OWD office, located at 2554 Sweetwater Springs Boulevard, Spring Valley, CA on August 2, 2012 at 4:00 p.m. The purpose of this meeting was to provide the public and governmental agencies with information on the 2012 WRMP Update and the CEQA process, and to give attendees an opportunity to identify environmental issues and alternatives that should be considered in the SPEIR. Attendees were invited to mail their comment letters to the OWD during the 30-day NOP public scoping period by no later than November 25, 2008, or leave them with OWD staff following the scoping meeting to ensure that their concerns would be addressed in the SPEIR. Comment forms were also available for attendees to fill out and leave with OWD staff at the scoping meeting. Although no comment forms were completed, verbal comments were received from one person at the scoping meeting.

Appendix A to this SPEIR includes the NOP and associated legal newspaper advertisement; copies of the written comments received during the NOP public scoping period; and matrices summarizing all

written and verbal comments received during the NOP public scoping period, and identifying the locations in the SPEIR where the pertinent comments are addressed.

The input received from the NOP public scoping period assisted the OWD in identifying the range of actions, alternatives, issues, and potential effects associated with the 2012 WRMP Update. All issues raised during the NOP public scoping period were reviewed by the OWD to determine the appropriate consideration and level of analysis.

1.3.2 SPEIR Public Review

The SPEIR is subject to a 45-day public review and comment period, beginning on April 10, 2013 and ending on May 24, 2013. "Responsible agencies," "trustee agencies," and interested organizations and individuals can provide written comments on the document during this review period. As defined in the State CEQA Guidelines, "responsible agencies" are those that have discretionary approval over the 2012 WRMP Update, in addition to the Lead Agency, and "trustee agencies" are those that have jurisdiction by law over natural resources affected by implementation of the 2012 WRMP Update, which are held in trust for the people of the State of California. There are no "responsible agencies" that have any discretionary approvals associated with the 2012 WRMP Update. As identified in the NOP comment letters (Appendix A to this SPEIR), the U.S. Fish and Wildlife Service (USFWS) is a "trustee agency" for the migratory birds, anadromous fish, and endangered plants, animals and their habitats under the protection of the federal Endangered Species Act (ESA) of 1973, as amended (16 United States Code [U.S.C.] 1531 et seq.), and which may be impacted by implementation of the 2012 WRMP Update. In addition, the U.S. Army Corps of Engineers (ACOE) is a "trustee agency" for the discharge of dredged or fill material into, including any redeposit of dredged material within "waters of the United States (U.S.)" and adjacent wetlands pursuant to Section 404 of the Clean Water Act (CWA) of 1972.

Written comments will be received by the OWD at the following address:

Lisa Coburn-Boyd
Otay Water District
2554 Sweetwater Springs Boulevard
Spring Valley, CA 91978-2004
Phone: (619) 670-2219
Fax: (619) 670-8920
E-mail: lisa.coburn-boyd@otaywater.gov

Copies of the SPEIR are available to the public for review at the addresses above, at the OWD website (www.otaywater.gov), and at the following public libraries:

- San Diego Main Public Library, 820 E Street, San Diego, CA 92101
- County Public Library, Rancho San Diego Branch, 11555 Via Rancho San Diego, El Cajon, CA 92019
- County Public Library, La Mesa Branch, 8074 Allison Avenue, La Mesa, CA 91941
- Chula Vista Public Library, Civic Center Branch, 365 F Street, Chula Vista, CA 91910

1.3.3 Organization of the SPEIR

The content and format of this SPEIR are designed to meet the requirements of CEQA and mimic the 2010 PEIR for the 2009 WRMP Update. This SPEIR includes the following:

- **Executive Summary.** Summarizes the proposed OWD 2012 WRMP Update, environmental impacts that would result from implementation of the proposed project, recommended mitigation measures that would avoid or reduce impacts, and the level of significance of impacts both before and after mitigation. Also identifies areas of controversy known to the Lead Agency and issues to be resolved including the choice among alternatives and whether or how to mitigated the significant effects.
- **Chapter 1, Introduction.** Provides an introduction and overview describing the purpose and intended use of the SPEIR, the SPEIR's compliance with CEQA, and the scope and organizational format of the SPEIR.
- **Chapter 2, Environmental Setting.** Provides a description of the physical environmental conditions in the vicinity of the project as they exist at the time the NOP is published, which constitute the baseline physical conditions by which OWD will determine if an impact is significant. This section also includes a discussion of the regional setting, including resources that are rare or unique to the region, and identifies any inconsistencies between the proposed project and applicable general and regional plans.
- **Chapter 3, Project Description.** Provides a detailed description of the proposed project, including its geographical setting, background information on the site's prior uses, major objectives, structural and technical characteristics and components, and project construction. This section also includes a list of discretionary actions that would be required to approve the proposed project by the Lead Agency and other Responsible and Trustee agencies.
- **Chapter 4, Scope and Format of Environmental Impact Analysis.** Contains project analysis for the various environmental issues listed above under Section 1.2.3. The subsection for each environmental topic contains a description of the existing environmental setting of the project site and area, regulatory framework, impacts and mitigation measures, cumulative impacts and mitigation, CEQA checklist items deemed not significant or not applicable to the 2012 WRMP Update, and references.
- **Chapter 5, Other CEQA Considerations.** Provides discussions required by Sections 15126 and 15128 of the State CEQA Guidelines, including effects found not to be significant during the SPEIR process, growth inducing impacts of the proposed project, significant environmental effects that cannot be avoided if the proposed project is implemented, and significant irreversible environmental changes that would result from implementation of the proposed project.
- **Chapter 6, Alternatives.** Describes alternatives to the proposed project that could avoid or substantially lessen significant effects and evaluates their environmental effects in comparison to the proposed project. The alternatives analyzed in this chapter include the No Project Alternative and the Reduced Footprint Alternative.
- **Chapter 7, Acronyms and Abbreviations.** This chapter defines the acronyms and abbreviations used throughout the SPEIR.
- **Chapters 8, List of Preparers.** This chapter provides a list of the SPEIR preparers.

- **Chapters 9, List of Recipients.** This chapter provides a list of persons/agencies to receive the SPEIR, respectively.
- **Appendix A,** Notice of Preparation (NOP) and responses

1.3.4 Other Related Environmental Documents

This SPEIR incorporates by reference the 2010 PEIR for the OWD 2009 WRMP Update (State Clearinghouse #2004011020), which was certified by the OWD Board of Directors in January, 2010. CEQA Guidelines Section 15150 provides guidance for incorporation by reference, and requires that relevant information be summarized in the subsequent environmental document provided that the previous environmental document be made available for review by the public. The 2010 PEIR for the OWD 2009 WRMP Update is available to the public for review at the OWD office listed in Section 1.3.2 above.

CHAPTER 2.0
ENVIRONMENTAL SETTING

2.1 Regional Setting

The 2010 PEIR for the 2009 WRMP Update described the overview of the regional and local environmental setting of the water supply and delivery systems within the Otay Water District and generalized information regarding natural resources and land use (Otay 2010). The WWMP applies to the region consisting of the northeastern portion of the Casa de Oro-Mount Helix community extending east to Rancho San Diego and south to Jamacha. The overall regional setting remains unchanged from the 2010 PEIR for the 2009 WRMP Update. That information is hereby incorporated by reference (OWD 2010 PEIR).

The WWMP is encompassed by the setting of the 2010 PEIR and covers wastewater pumping, transmission and treatment facilities located in the Casa de Oro-Mount Helix community. The regional setting extends just north of the Grandview Drive-Fuerte Drive intersection, south to the Jamacha Road-Willow Glen Drive intersection on the west, extending into Jamacha in the south to the southern access to Stonefield Drive, and encompassing portions of Rancho San Diego to Dehesa Road on the north and east.

2.2 Local Setting

The WWMP service area lies within south central San Diego County. Within the WWMP area there is one primary operating system for wastewater, the Hillsdale system in the North District. A brief description of the environmental setting within the WWMP operating system is included below.

2.2.1 HILLSDALE SYSTEM

The Hillsdale System, in the northern portion of the planning area, comprises 9,569 acres. Elevations range from 325 feet AMSL to 2,167 feet AMSL, and this area contains one scenic topographic feature: McGinty Mountain. In addition, Jamacha Valley and Sweetwater River traverse this service area. Approximately 50 percent of this area is urban; the remaining portions consist of Diegan Coastal Sage Scrub, Chaparral, Riparian Forest, Agriculture, Oak Woodland, and Wetlands.

CHAPTER 3.0
PROJECT DESCRIPTION

3.1 Introduction

The purpose of this chapter is to describe the proposed project for the public, reviewing agencies and decision-makers. According to the California Environmental Quality Act (CEQA) Guidelines §15124, a complete project description must contain the following information: a) the precise location and boundaries of the proposed project, shown on a detailed map, along with a regional map of the project's location; b) a statement of the underlying purpose of the project and the objectives (or goals) sought by the proposed project; c) a description of the project's technical, economic, and environmental characteristics; and d) a discussion of the intended uses of this Draft Supplemental Program Environmental Impact Report (SPEIR), including discretionary actions (refer to Section 2.0, Introduction, of this SPEIR).

A Draft Supplemental Program EIR is being prepared pursuant to CEQA Guidelines §15163, to supplement the 2010 Final Program EIR for the OWD 2009 Water Resources Master Plan Update (WRMP) because the WWMP contains many features and issues of wastewater/recycled water that have been previously addressed and analyzed within the 2009 WRMP. This document would also be prepared (pursuant to CEQA Guidelines §15168) as a Program EIR because the WWMP is a policy document that describes several wastewater alternatives for a long-term systematic approach to meet future wastewater needs through the Year 2030. The SPEIR would provide the basis for subsequent environmental review of future wastewater projects. The OWD is the Lead Agency for the preparation of this SPEIR, as defined in CEQA Guidelines §15367.

3.2 Program Location

As shown in Figure 3-1, the OWD service area is regionally located within south central San Diego County, and is bounded by rural lands to the east, the Padre Dam Municipal Water District to the north, the Helix Water District to the northwest, the Sweetwater Authority and the City of San Diego to the west, and the International Border with Mexico to the south. There are several major transportation routes though which access to the OWD is possible, including Highway 94 in the north, Interstate Highways 805 and 905 in the south and State Route 125 in the north and south.

The OWD service area consists of 80,320 acres (125.5 square miles), within south central San Diego County. Elevations within the planning area range from 59 feet above mean sea level (AMSL) to 2,605 feet AMSL. The OWD water service area is divided into two distinct systems: the North District, serving San Diego County communities above Sweetwater Reservoir, and the South District, serving the City of Chula Vista and Otay Mesa. Within these two area systems are five primary operating systems for potable water, including the Regulatory, La Presa, and Hillsdale systems in the North District and the Central and Otay Mesa systems in the South District. The OWD also maintains and operates a recycled water system in the South District (Central and Otay Mesa operating systems). In addition to water supply, the OWD

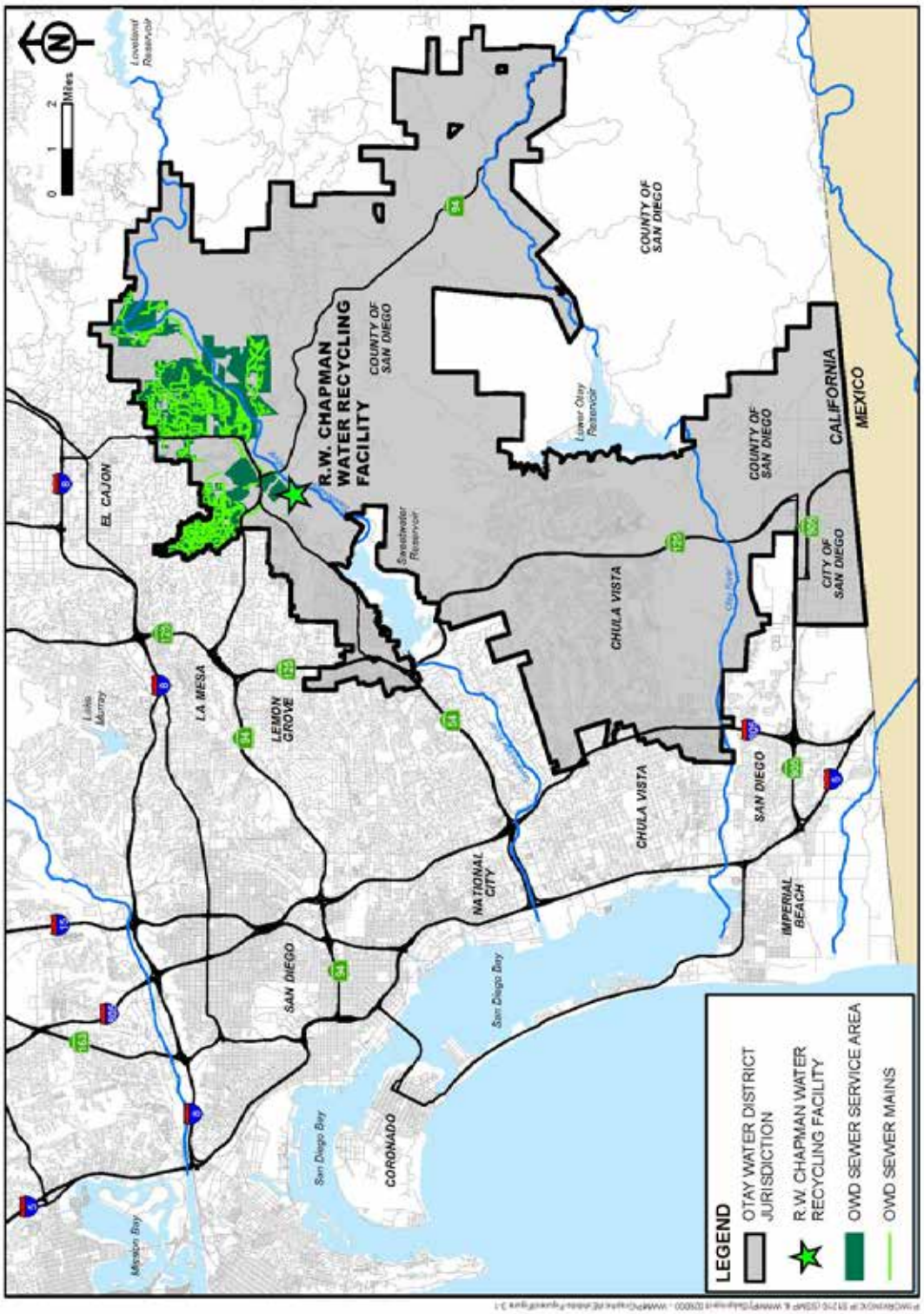


Figure 3-1

REGIONAL LOCATION MAP

also provides sewage collection, wastewater treatment, and disposal services to users within a small portion of the North District, consisting of the northeastern portion of the Casa de Oro-Mount Helix community extending east to Rancho San Diego and south to Jamacha (Figure 3-2).

3.3 Background

The OWD was authorized as a California Special District by the State Legislature in 1956, under the provisions of the Municipal Water District Law of 1911, and thereby gained its entitlement to imported water. As a member agency of the San Diego County Water Authority (SDCWA), the OWD purchases all potable water that it delivers from the SDCWA. The SDCWA is responsible for transmission of the imported water supply within San Diego County to its member agencies, and is itself a member of the Metropolitan Water District of Southern California.

The existing potable water supply to the OWD comes from the SDCWA through four separate connections to Pipeline No. 4 within the Second Aqueduct route of the SDCWA Flow Control Facility. The OWD also receives treated potable water from the R.M. Levy Water Treatment Plan (WTP), which is operated by the Helix Water District.

The Ralph W. Chapman Water Reclamation Facility (RWCWRF) operated by the OWD and the South Bay Water Reclamation Plant operated by the City of San Diego both supply recycled water for users within the OWD service area. The OWD's wastewater collection system in the North District is the source of the influent wastewater that is treated at the RWCWRF.

In 2002, the OWD developed a comprehensive WRMP that combined all previously existing master plans and facility plans into one system-wide plan outlining the Capital Improvement Program (CIP) projects required to serve their customers. The following three phases were identified in the 2002 WRMP: Phase I (2002-2006), Phase II (2007-2016), and Phase III (2017-2030).

Since 2002, the OWD has continued to improve its potable water facilities to meet the water demands associated with growth. The OWD has also continued to improve and expand its recycled water facilities to serve irrigation demands and conserve potable water supplies. The OWD's wastewater collection system and the RWCWRF have also been improved. The CIP is updated annually to reflect system improvements and to identify future needs for budgeting purposes.

3.4 Wastewater Management Plan

3.4.1 Purpose

The purpose of the Otay Water District (OWD) Wastewater Management Plan (WWMP) is to supplement the 2009 Water Resources Management Plan Update (WRMP). It identifies and evaluates current wastewater facilities (e.g., wastewater collection pipelines, pumping stations and a treatment plant), and designs feasible wastewater management strategies that allow the OWD to meet projected future wastewater needs within the OWD planning area and adjacent areas of influence. Additionally, the OWD WWMP develops a phased and systematic approach to implement the wastewater management strategies during future time frames. The OWD WWMP would ensure a wastewater system adequate for projected growth within the OWD planning area and adjacent areas of influence, consistent with the San Diego Association of Governments (SANDAG) forecasts through 2030.

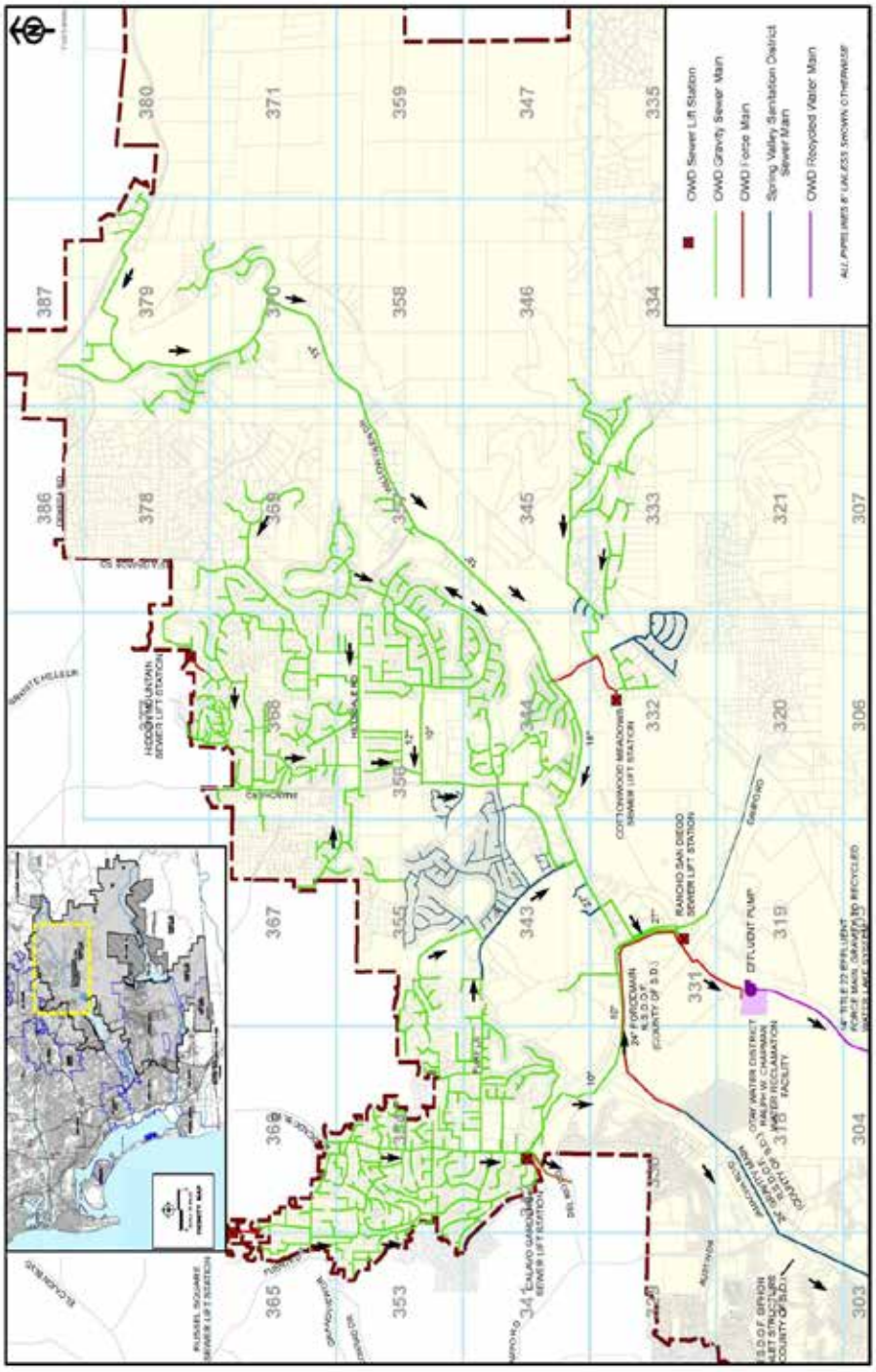

OTAY WATER DISTRICT WASTEWATER SERVICE AREA
OWD Sewer Lift Station
OWD Gravity Sewer Main
OWD Force Main
Spring Valley Sanitation District Sewer Main
OWD Recycled Water Main
ALL PIPELINES 8" UNLESS SHOWN OTHERWISE
RANCHO SAN DIEGO SEWER LIFT STATION
COTTONWOOD MEADOWS SEWER LIFT STATION
EFFLUENT PUMP
OTAY WATER DISTRICT RALPH W. CHAMBERLIN WATER RECLAMATION FACILITY

Figure 3-2

3.4.2 Goals and Objectives

The WWMP will identify a comprehensive system-wide plan for a wastewater system within the OWD planning area and the identified area of influence. The OWD's primary objectives for the WWMP include the following actions:

- Update Planning Criteria: Update the land use database model from the 2010 WRMP using San Diego County land use updates and 2010 SANDAG land use projections. Project the wastewater flows within the District's service area and adjacent areas of influence using population (residential and employment) projections and per capita generation factors.

- Update Hydraulic Model: Update the OWD 2006 hydraulic model using data from the County's updated hydraulic model for the Jamacha Basin.

- Evaluate Existing Wastewater Systems: Make recommendations for improvements to correct deficiencies of existing systems, and to meet any demands of the planning area and identified area of influence based upon development patterns, types, location and timing.

- Evaluate Future Wastewater Systems: Using the projected wastewater collection rates for the planning area, determine new wastewater collection system facilities needs to build out and develop a list of capital improvement program projects to meet these needs. Develop strategies for treatment of the collected wastewater flows and their corresponding CIP needs.

- Update CIP: Develop a phased implementation plan for recommended CIP projects for the existing system deficiencies and any new facilities and estimate costs for identified projects.

3.4.3 Facilities Overview

The Otay Water District's existing wastewater system includes collection system pipelines, pump stations, and the wastewater treatment plant (RWCWRF).

The wastewater system includes approximately 95 miles of collection system pipelines, of which 92 miles are gravity sewers and 3 miles are force mains. The District owns approximately 78 miles of the gravity sewers, and the rest is owned by the County (please refer to Figure 3-1 in the 2012 WWMP). The gravity sewers range in diameter from 4 inches to 27 inches with the majority (84%) of the collection system being comprised of 8-inch diameter pipes. The force mains range in diameter from 4 inches to 24 inches.

Pipeline projects involve trench excavation, preparing the bed for pipe placement, laying the pipe in the trench, filling the trench, and restoring the disturbed surface area. Where it is not feasible to install a pipeline within a street right-of-way, the OWD makes every effort to use the shortest possible route between connection points to minimize ground-level impacts.

The District's wastewater system has six pump stations (please refer to Figure 3-1 in the 2012 WWMP). Pump station projects involve the movement of water uphill so that the wastewater can then flow by gravity. Pump stations typically consist of buildings containing pumps, electric power-line connections, pipeline connections, fencing, and access roads. In general, pump capacity is reported in units of gallons per minute (gpm) or millions of gallons per day (MGD).

The District owns and operates the RWCWRF. The existing capacity of the RWCWRF is 1.3 MGD, and the facility is located on a site master-planned for an ultimate build-out capacity of 3.9 MGD. The RWCWRF is a scalping plant so that any flows that exceed the capacity of the plant are disposed of via

the Rancho San Diego Outfall facilities to the San Diego Metropolitan System. This is also the case if the facility is shut down for any reason. The RWCWRF provides tertiary treatment that produces reclaimed water to meet Title 22 standards. The plant was upgraded in 2012 to include de-nitrification to reduce the effluent total nitrogen levels.

3.4.4 Description of Projects

Collection System Projects

Table 3-1 summarizes the collection system projects that are included in OWD's existing capital improvement budget. This budget includes projects from fiscal year 2013 through fiscal year 2018. These projects incorporate pipeline rehabilitation and/or replacement, manhole rehabilitation and/or replacement and pipeline spot repairs (less than 10 feet).

Table 3-1. Current Wastewater Collection System Projects – FY 2013 through FY 2018 Budget

CIP #	Description	Est. Start	Est. Finish	Current Budget
S2024	Campo Road Sewer Main Replacement	07/01/2010	06/01/2017	$5,500,000
S2028	Explorer Way 8-inch Sewer Main Replacement	07/01/2011	09/01/2016	$125,000
S2033	Sewer System Various Locations Rehabilitation	07/01/2011	09/01/2015	$800,000
S2040	Calavo Sewer Basin Improvements	07/01/2012	09/01/2014	$1,250,000
S2041	Rancho San Diego Sewer Basin Improvements	07/01/2012	09/01/2016	$1,750,000

Table 3-2 summarizes wastewater collection system improvement recommendations identified in the 2012 WWMP and the capital cost opinions for these projects. In some cases the projects have already been incorporated into the current OWD CIP Budget. For example, CIP #3 corresponds to S2024 in Table 3-1. The remaining recommended projects (CIP #1, 2, 4) are in the Rancho San Diego basin and will be considered with the improvements under CIP project S2041. The estimated total capital cost for the recommended infrastructure to correct existing system deficiencies is $8.53 million. To accommodate 2030 wastewater flows, the additional capital cost is approximately $2.72 million.

Table 3-2. Recommended Wastewater Collection System Improvements – 2012 WWMP

Project No.	Description		Location	Unit Cost ($/LF)	Conceptual Cost Opinion ($)	
					Existing	2030
Collection System Pipes						
CIP #1	12-inch	36 LF	Near Fury Lane and Jamacha Road	1,020	$37,000	--
CIP #2	24-inch	91 LF	Near Hillsdale Road and Jamacha Road	2,040	$190,000	--
CIP #3	15-inch	9,225 LF	Along Campo Road from Avocado Road to Singer Lane	900	$8,300,000	--
CIP #4	15-inch	900 LF	Near Jamacha Road and Donahue Drive	1,275	--	$1,150,000
CIP #5	15-inch	1,235 LF	Along Ivanhoe Ranch Road upstream of Cottonwood Pump Station	1,275	--	$1,570,000
Total					**$8,527,000**	**$2,720,000**

Overall Collection and Wastewater Treatment System Project Alternatives

The WWMP also identifies several alternatives for the overall system of wastewater collection and treatment within the OWD. Each alternative has different project features and components and give the OWD the most flexibility in choosing the best alternative that fulfills their wastewater strategies and meets projected future demand.

Alternative 1 -No Project Alternative

The no project alternative is the same as that presented in the 2010 PEIR and as such is incorporated by reference. This alternative represents the baseline conditions and is analyzed via the comparison to the other alternatives listed below.

Alternative 2 – Eliminate Wastewater Treatment within District

Under this alternative, the District would abandon the current wastewater treatment operations at the Ralph W. Chapman Water Recycling Facility (RWCWRF) and all wastewater flows collected by the District would be conveyed to the City of San Diego (SD) Metropolitan Wastewater System for treatment at the South Bay Water Reclamation Plant (SBWRP). Other components associated with this alternative include, decommissioning the RWCWRF; implementing the required Rancho San Diego Pump Station (PS) improvements; maintaining and improving the wastewater collection system based on hydraulic modeling.

Treatment options for wastewater flows being conveyed to the City of SD Metropolitan Wastewater System could be to either maintain current primary treatment or implement secondary treatment. Recycled water supply options under this alternative include receiving reclaimed water from the SBWRP and/or a proposed City of Chula Vista water reclamation facility.

Alternative 3 – Recycle All Wastewater Flows within District

Under this alternative, the District would continue collecting and treating wastewater at the RWCWRF under the current capacity of 1.3 MGD or operations could potentially be expanded to approximately 2.6 MGD. Excess flows beyond the RWCWRF's capacity would be conveyed to the City of SD Metropolitan Wastewater System for treatment at the SBWRP. Other components associated with this alternative include implementing the required Rancho San Diego PS improvements and maintaining and improving the wastewater collection system based on hydraulic modeling.

Options for solid waste disposal would include continuing current practices of conveyance to the Metropolitan Wastewater System or handling/treating solid waste onsite and disposing residuals in landfill. Treatment options for wastewater flows being conveyed to the City of SD Metropolitan Wastewater System could be to either maintain current primary treatment or implement secondary treatment. Recycled water supply options under this alternative include receiving reclaimed water from the RWCWRF, the SBWRP and/or a proposed City of Chula Vista water reclamation facility.

Alternative 4 – Recycle All Wastewater Flows within District and Expand To Accept Wastewater From Other Service Areas

Under this alternative, the District would continue collecting and treating wastewater at the RWCWRF under an increased capacity of up to approximately 3.9 MGD. Under this scenario, the District would be able to treat all wastewater from the Jamacha Basin and any other service areas that needed wastewater treatment. Excess flows beyond the RWCWRF's capacity (if any) would be conveyed to the City of SD

Metropolitan Wastewater System for treatment at the SBWRP. Other components associated with this alternative include implementing the required Rancho San Diego PS improvements and maintaining and improving the wastewater collection system based on hydraulic modeling.

Options for solid waste disposal would include continuing current practices of conveyance to the Metropolitan Wastewater System or handling/treating solid waste onsite and disposing residuals in landfill. Treatment options for wastewater flows being conveyed to the City of SD Metropolitan Wastewater System could be to either maintain current primary treatment or implement secondary treatment. Recycled water supply options under this alternative include receiving reclaimed water from the RWCWRF, the SBWRP and/or a proposed City of Chula Vista water reclamation facility.

3.4.5 Phasing

Phasing for the recommended CIP projects may be accelerated or deferred as required to account for changes in development project schedules, availability of land or right-of-way for construction, project funding limitations, environmental concerns or other considerations.

3.4.6 Permits, Approvals, and Regulatory Requirements

Numerous federal, State and local regulations and permit requirements would be applicable to the implementation of the 2012 WMMP Update (2009 WRMP Update) (Table 3-3). The OWD, or its contractors, would be required to comply with all applicable requirements, unless by exception of Government Code Section 53091.

Table 3-3. Potential Permits and Approvals

Agency/Department	Permit/Approval	Action Associated With or Required For
Federal Agencies		
USFWS	Biological Assessment, Section 7 Consultation, Biological Opinion (Endangered Species Act [ESA] 16 U.S.C. 1531-1544)	Activity where there may be an effect on federally-listed endangered/threatened/ proposed species (applies to projects with federal involvement).
	Fish and Wildlife Coordination Act	Provide comments to prevent loss of, and damage to, wildlife resources.
ACOE	Individual/Nationwide Section 404 Permit (CWA, 33 USC 1341)	Discharge of dredge/fill into Waters of the U.S., including wetlands.
	Section 10, Rivers and Harbors Act Permit	Activities, including the placement of structures, affecting navigable waters.
Advisory Council on Historic Preservation	Section 106 Consultation, National Historic Preservation Act (NHPA)	Opportunity to comment if project may affect cultural resources listed or eligible for listing on National Register of Historic Places (NRHP).
U.S. Department of Transportation (USDOT), Federal Highway Administration (FHA)	Encroachment Permits	Consider issuance of permit for transmission line crossing of federally-funded highways.
U.S. Department of the Treasury, Bureau of Alcohol, Tobacco and Firearms	Explosive User's Permit	Consider issuance of permit to purchase, store and use explosives for site preparation.
State Agencies		

Agency/Department	Permit/Approval	Action Associated With or Required For
State Water Resources Control Board (SWRCB), Regional Water Quality Control Board (RWQCB)	General Construction Activity Stormwater Permit	Stormwater discharges associated with construction activity.
	Waste Discharge Requirements (Water Code 13000 *et seq.*)	Discharge of waste that might affect groundwater or surface water (nonpoint-source) quality.
	401 Certification (CWA, 33 USC 1341. If the project requires ACOE 404 Permit)	Discharge into waters and wetlands (see ACOE Section 404 Permit).
California State Lands Commission	Right-of-Way Permit (Land Use Lease)	Consider issuance of a grant of right-of-way across State land.
California Department of Fish and Wildlife (CDFW)	California ESA	Activity where a listed candidate, threatened, or endangered species under California ESA may be present in the project area and a State agency is acting as lead agency for CEQA compliance. Consider issuance of a Section 2081 incidental take permit for State-only listed species and a Section 2081.1 consistency determination for effects on species that are both federally and State listed.
California Department of Fish and Wildlife (CDFW)	California Native Plant Protection Act	Review of mitigation agreement and mitigation plan for plants listed as rare.
	Lake/Streambed Alteration Agreement (California Fish and Game Code Section 1601)	Change in natural state of river, stream or lake (includes road or land construction across a natural streambed).
California Department of Transportation (Caltrans)	Encroachment Permit	Consider issuance of permits to cross State highways.
California Coastal Commission (CCC)	Coastal Development Permit	Development within the Coastal Zone.
California State Historic Preservation Office	Section 106 Consultation, NHPA	Consult with Bureau of Land Management (BLM), project applicant, appropriate land management agencies, and others regarding activities potentially affecting cultural resources.
Local Agencies		
County of San Diego Department of Environmental Health (DEH)	Hazardous Materials Business Plan	Hazardous material exceeding federal threshold quantities.
	Hazardous Materials Inventory	Hazardous materials exceeding County threshold quantities.
San Diego Country, Sheriff's Department	Explosives Permit	Consider issuance of a license to store flammable explosives.
San Diego Air Pollution Control District (SDAPCD)	Authority to Construct	Emissions from a stationary source.
	Permit to Operate	Equipment emitting pollutants from a stationary source.

CHAPTER 4.0
SCOPE AND FORMAT OF ENVIRONMENTAL IMPACT ANALYSIS

The discussion in this chapter resulted from supplemental information and alternatives to the OWD Wastewater Management Plan (WWMP). This included information related to existing site conditions, analyses of the type and magnitude of individual and cumulative environmental impacts, and feasible mitigation measures that could reduce or avoid environmental impacts. Analyses performed and presented in Chapter 4.0 of the 2010 Water Resources Master Plan (WRMP) PEIR are included in their entirety by reference (Otay 2010).

The SPEIR is intended as a basic reference document to avoid unnecessary repetition of facts or analysis contained in the 2010 WRMP PEIR. Therefore, this SPEIR only contains significant updated technical information or other significant supplemental information to supplement the previous PEIR for the WWMP analysis.

Scope of the Environmental Impact Analysis

This SPEIR falls entirely within the area analyzed by the 2010 PEIR without exception and therefore assumes the same scope. That information is hereby incorporated by reference (Otay 2010).

Format of the Environmental Impact Analysis

The following subsections comprise each of the ten environmental topic sections in Chapter 4.0 of this SPEIR.

Environmental Setting

This SPEIR falls entirely within the physical area analyzed by the 2010 PEIR without exception and therefore assumes the same scope. That information is hereby incorporated by reference (Otay 2010).

Regulatory Framework

This SPEIR falls entirely within the regulatory jurisdiction analyzed by the 2010 PEIR without exception and therefore assumes the same scope. That information is hereby incorporated by reference (Otay 2010).

Impacts and Mitigation

This SPEIR falls entirely within the area analyzed by the 2010 PEIR without exception and therefore has no changes to the methodology determining impacts and mitigation. That information is hereby incorporated by reference (Otay 2010).

Project Design Features/Standard Construction Practices

This SPEIR falls entirely within the area analyzed by the 2010 PEIR without exception and therefore assumes the same design and practices standards will be applied. That information is hereby incorporated by reference (Otay 2010).

Standards of Significance

This SPEIR falls entirely within the area analyzed by the 2010 PEIR without exception and therefore assumes the same standards of significance. That information is hereby incorporated by reference (Otay 2010).

Impact Analysis

This SPEIR falls entirely within the area analyzed by the 2010 PEIR without exception and therefore employs the same impact analysis. That information is hereby incorporated by reference (Otay 2010)

Mitigation/Performance Measures

This SPEIR falls entirely within the area analyzed by the 2010 PEIR without exception and therefore assumes the same mitigation and performance measures. That information is hereby incorporated by reference (Otay 2010).

Cumulative Impacts and Mitigation

This SPEIR falls entirely within the area analyzed by the 2010 PEIR without exception and therefore has no changes to the methodology determining cumulative impacts and mitigation. That information is hereby incorporated by reference (Otay 2010).

Regional Land Use Planning and Projected Growth

This SPEIR falls entirely within the area analyzed by the 2010 PEIR without exception and therefore has no changes to regional land use planning and projected growth. That information is hereby incorporated by reference (Otay 2010).

San Diego County General Plan

This SPEIR falls entirely within the area analyzed by the 2010 PEIR without exception and therefore has no changes to the analysis of effects on the San Diego County General Plan. That information is hereby incorporated by reference (Otay 2010).

Incorporated City General Plans

This SPEIR falls entirely within the area analyzed by the 2010 PEIR without exception and therefore has no changes to the analysis of effects on the Incorporated City General Plans. That information is hereby incorporated by reference (Otay 2010).

Baja California, Mexico

This SPEIR falls entirely within the area analyzed by the 2010 PEIR without exception and therefore has no changes to the analysis of effects on the Baja California region. That information is hereby incorporated by reference (Otay 2010).

2030 San Diego Regional Transportation Plan

This SPEIR falls entirely within the area analyzed by the 2010 PEIR without exception and therefore has no changes to the analysis of effects on the San Diego Regional Transportation Plan. That information is hereby incorporated by reference (Otay 2010).

Cumulative Project Identified in the 2002 WRMP

This SPEIR falls entirely within the area analyzed by the 2010 PEIR without exception and therefore has no changes to the analysis of effects on the San Diego County General Plan. That information is hereby incorporated by reference (Otay 2010).

Cumulative Projects in the Unincorporated Portions of the WRMP Planning Area

This SPEIR falls entirely within the area analyzed by the 2010 PEIR without exception and therefore has no changes to the analysis of effects on the Cumulative Projects in the Unincorporated Portions of the WRMP Planning Area. That information is hereby incorporated by reference (Otay 2010).

Cumulative Projects on Tribal Lands (Sycuan Reservation)

This SPEIR falls entirely within the area analyzed by the 2010 PEIR without exception and therefore has no changes to the analysis of effects on the Cumulative Projects on Tribal Lands (Sycuan Reservation). That information is hereby incorporated by reference (Otay 2010).

Cumulative Regional Energy and Utility Projects

This SPEIR falls entirely within the area analyzed by the 2010 PEIR without exception and therefore has no changes to the analysis of effects on Cumulative Regional Energy and Utility Projects. That information is hereby incorporated by reference (Otay 2010).

CEQA Checklist Items Deemed Not Applicable

This SPEIR falls entirely within the area analyzed by the 2010 PEIR without exception and does not present any impacts that differ significantly from those analyzed in the 2010 PEIR. Therefore those items deemed not applicable within the 2010 PEIR CEQA Checklist are also deemed as such in the SPEIR. That information is hereby incorporated by reference (Otay 2010).

4.1 Air Quality and Global Climate Change

This section of the SPEIR for the 2012 WRMP Update describes existing conditions within the planning area with respect to air quality and global climate change; the potential physical environmental effects (direct, indirect, and/or cumulative) related to these issues resulting from development of projects under the WWMP; and the project design features (PDF), standard construction practices (SCP), and mitigation/performance measures to reduce or avoid the identified impacts.

4.1.1 Environmental Setting

Climatology

This SPEIR falls entirely within the area analyzed by the 2010 PEIR without exception and therefore assumes the same environmental setting. That information is hereby incorporated by reference (Otay 2010). No significantly new information has occurred since the certification of the 2010 PEIR and so no new information is presented to supplement this section of the 2010 PEIR.

Existing Air Quality within the Planning Area

This SPEIR falls entirely within the area analyzed by the 2010 PEIR without exception and therefore the same environmental setting. That information is hereby incorporated by reference (Otay 2010). No significantly new information has occurred since the certification of the 2010 PEIR and so no new information is presented to supplement this section of the 2010 PEIR.

Greenhouse Gases

This SPEIR falls entirely within the area analyzed by the 2010 PEIR without exception and therefore the same environmental setting. That information is hereby incorporated by reference (Otay 2010). No significantly new information has occurred since the certification of the 2010 PEIR and so no new information is presented to supplement this section of the 2010 PEIR.

4.1.2 Regulatory Framework

Federal

This SPEIR falls entirely within the area analyzed by the 2010 PEIR without exception and therefore is subject to the same regulatory framework. That information is hereby incorporated by reference (Otay 2010). No significantly new information has occurred since the certification of the 2010 PEIR and so no new information is presented to supplement this section of the 2010 PEIR.

State

This SPEIR falls entirely within the area analyzed by the 2010 PEIR without exception and therefore is subject to the same regulatory framework. That information is hereby incorporated by reference (Otay 2010). No significantly new information has occurred since the certification of the 2010 PEIR and so no new information is presented to supplement this section of the 2010 PEIR.

Local

This SPEIR falls entirely within the area analyzed by the 2010 PEIR without exception and therefore is subject to the same regulatory framework. That information is hereby incorporated by reference (Otay 2010). No significantly new information has occurred since the certification of the 2010 PEIR and so no

new information is presented to supplement this section of the 2010 PEIR.

4.1.3 Project Impacts and Mitigation

Issue 1 – Consistency with Applicable Air Quality Plans

Air Quality and Climate Change Issue 1 Summary	
Would implementation of the 2012 WRMP Update result in a conflict with or obstruct implementation of the applicable air quality plan?	
Impact: Growth assumptions made within the 2012 WRMP Update to determine future service requirements have already been accounted for within the 2009 SDAPCD RAQS and 2007 SIP; therefore, the 2012 WRMP Update would not conflict with or obstruct implementation of the applicable air quality plan.	**Mitigation:** No mitigation is required.
Significance Before Mitigation: Less than significant.	**Significance After Mitigation:** Less than significant.

No significantly new information has occurred since the certification of the 2010 PEIR and so no new information is presented to supplement this section of the 2010 PEIR. The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore, comparable to the 2009 WRMP as analyzed by the 2010 PEIR, impacts to air quality will be avoided or fully mitigated. That information is hereby incorporated by reference (Otay 2010).

Issue 2 – Consistency with Air Quality Standards

Air Quality and Global Climate Change Issue 2 Summary	
Would implementation of the 2012 WRMP Update violate any air quality standard or contribute substantially to an existing or projected air quality violation?	
Impact: Implementation of standard construction practices (Air-SCP-1and Air-SCP-2) would minimize air pollutant emissions from construction activities. However, as the details regarding number and type of construction equipment are unknown at this time, emissions may result in a violation of air quality standards, and therefore construction impacts are considered potentially significant. Once constructed, operational sources of air pollutants from the CIP projects would be less than significant.	**Mitigation:** An air quality technical study shall be prepared for each CIP project once the project reaches the design stage to ensure that air pollutant emissions associated with construction activity are within the screening thresholds established by the SDAPCD (Air-1).
Significance Before Mitigation: Potentially significant.	**Significance After Mitigation:** Less than significant.

No significantly new information has occurred since the certification of the 2010 PEIR and so no new information is presented to supplement this section of the 2010 PEIR. The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore, comparable to the 2009 WRMP as analyzed by the 2010 PEIR, impacts to air quality will be avoided or fully mitigated. That information is hereby incorporated by reference (Otay 2010).

Issue 3 – Consistency with Applicable Policies Adopted for the Purpose of Reducing the Emissions of Greenhouse Gases

Air Quality and Global Climate Change Issue 3 Summary	
Would implementation of the 2012 WRMP Update conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?	
Impact: Implementation of standard construction practices (Air-SCP-3 through Air-SCP-7) and energy efficiency measures (Ene-1 through Ene-4) would incorporate all applicable features that are consistent with measures recommended by the California Climate Action Team, CAPCOA, California Attorney General and the County of San Diego for assisting the State of California in the attainment of the goals of AB 32.	**Impact:** Implementation of standard construction practices (Air-SCP-3 through Air-SCP-7) and energy efficiency measures (Ene-1 through Ene-4) would incorporate all applicable features that are consistent with measures recommended by the California Climate Action Team, CAPCOA, California Attorney General and the County of San Diego for assisting the State of California in the attainment of the goals of AB 32.
Significance Before Mitigation: Less than significant.	**Significance Before Mitigation:** Less than significant.

No significantly new information has occurred since the certification of the 2010 PEIR and so no new information is presented to supplement this section of the 2010 PEIR. The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore, comparable to the 2009 WRMP as analyzed by the 2010 PEIR, impacts to air quality will be avoided or fully mitigated. That information is hereby incorporated by reference (Otay 2010).

4.1.4 Cumulative Impacts and Mitigation

Air Quality, Climate Change, and Global Warming Cumulative Issue Summary		
Would implementation of the 2012 WRMP Update have a cumulatively considerable contribution to a cumulative air quality impact considering past, present, and probable future projects?		
Cumulative Impact	**Significant**	**WRMP Contribution**
Consistency with applicable air quality plan.	Less than significant.	Not cumulatively considerable.
Consistency with air quality standards.	Potentially significant	Not cumulatively considerable with implementation of Air-SCP-1, Air-SCP-2 and Air-1.
Greenhouse gas emissions.	Yes.	Not cumulatively considerable with implementation of Air-SCP-1 through Air- SCP-3 and Ene-PDF-1through Ene-PDF-4.

Issue 1 – Consistency with Applicable Air Quality Plans

No significantly new information has occurred since the certification of the 2010 PEIR and so no new information is presented to supplement this section of the 2010 PEIR. The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore, comparable to the 2009 WRMP as analyzed by the 2010 PEIR, impacts to air quality will be avoided or fully mitigated. That information is hereby incorporated by reference (Otay 2010).

Issue 2 – Consistency with Air Quality Standards

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore, comparable to the 2009 WRMP as analyzed by the 2010 PEIR, impacts to air quality will be avoided or fully mitigated. That information is hereby incorporated by reference (Otay 2010).

4.1.5 CEQQ Checklist Items Deemed Not Significant or Not Applicable to the 2012 WRMP Update

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore comparable to the 2009 WRMP as analyzed by the 2010 PEIR, impacts to air quality will be avoided or fully mitigated. That information is hereby incorporated by reference (Otay 2010).

4.2 Biological Resources

The 2010 PEIR for the 2009 WRMP Update described existing conditions within the planning area with respect to biological resources; the potential physical environmental effects (direct, indirect, and/or cumulative) related to these issues resulting from development of projects under the WWMP; and the project design features, standard construction practices, and mitigation/ performance measures to reduce or avoid the identified impacts (Otay 2010).

This section of the SPEIR is intended to supplement the previous information and analysis contained within the corresponding section of the 2010 PEIR. The analysis of the WWMP does not significantly differ, unless indicated below, from the original analysis within the 2010 PEIR and therefore does not need additional analysis/updating. That information is hereby incorporated by reference (Otay 2010).

4.2.1 Environmental Setting

Research Methods

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore research methods are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

Biological Resources

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore biological resources are identical to those in the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

Special-Status Biological Resources

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore special-status biological resources are identical to those in the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

4.2.2 Regulatory Framework

Federal Regulations

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore comparable to the 2009 WRMP as indicated by the 2010 PEIR the same Federal Regulations apply. That information is hereby incorporated by reference (Otay 2010).

State Regulations

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore comparable to the 2009 WRMP as indicated by the 2010 PEIR the same State Regulations apply. That information is hereby incorporated by reference (Otay 2010). Since the 2010 PEIR the State agency governing biological resources has changed names from California Department of Fish and Game (CDFG) to California Department of Fish and Wildlife

(CDFW) all references in the original 2010 PEIR to the California Department of Fish and Game (CDFG) should now read California Department of Fish and Wildlife (CDFW).

Local Regulations

The construction and operation of the CIP projects identified in the of the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore comparable to the 2009 WRMP as indicated by the 2010 PEIR the same Local Regulations apply. That information is hereby incorporated by reference (Otay 2010).

4.2.3 Impacts and Mitigation

Issue 1 – Sensitive Species and Habitats

Biological Resources Issue 1 Summary	
Would implementation of the 2012 WRMP Update result in a substantial adverse effect, either directly or through habitat modifications, on any sensitive or special-status species or sensitive habitats?	
Impact: Implementation of the 2012 WRMP Update would result in direct impacts to sensitive plant and animal species.	**Mitigation**: Pre-construction surveys and noise attenuation (Bio-1A through Bio-1C); shielding of construction lighting (Bio-1D); delineation of construction limits and staging areas (Bio-1E)
Significance Before Mitigation: Potentially significant.	**Significance After Mitigation**: Less than significant.

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore, comparable to the 2009 WRMP as analyzed by the 2010 PEIR, impacts to sensitive species and habitats will be avoided or fully mitigated. That information is hereby incorporated by reference (Otay 2010).

4.2.4 Cumulative Impacts and Mitigation

Sensitive Species and Habitats

Biological Resources Cumulative Issue Summary		
Would implementation of the 2012 WRMP Update have a cumulatively considerable contribution to a cumulative biological resources impact considering past, present, and probable future projects?		
Cumulative Impact	**Significance**	**Proposed Project Contribution**
Regional loss of sensitive plants, animals, and vegetation communities.	Potentially significant.	Not cumulatively considerable with implementation of performance measures Bio-1A through Bio-1E.

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore, comparable to the 2009 WRMP as analyzed by the 2010 PEIR, cumulative impacts to sensitive species and habitats will be avoided or fully mitigated. That information is hereby incorporated by reference (Otay 2010).

4.2.5 CEQA Checklist Items Deemed Not Significant or Not Applicable to the 2012 WRMP Update

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore CEQA Checklist Items Deemed Not Significant or Not Applicable to the 2012 WRMP Update are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

4.3 Cultural Resources

The 2010 PEIR for the 2009 WRMP Update described existing conditions within the planning area with respect to cultural resources; the potential physical environmental effects (direct, indirect, and/or cumulative) related to these issues resulting from development of projects under the WWMP; and the project design features (PDF), standard construction practices (SCP), and mitigation/performance measures to reduce or avoid the identified impacts (Otay 2010).

This section of the SPEIR is intended to supplement the previous information and analysis contained within the corresponding section of the 2010 PEIR. The analysis of the WWMP does not significantly differ, unless indicated below, from the original analysis within the 2010 PEIR and therefore does not need additional analysis/updating. That information is hereby incorporated by reference (Otay 2010).

4.3.1 Environmental Setting

Prehistoric Setting

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore the prehistoric setting is identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

Historic Setting

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore the historic setting is identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

4.3.2 Regulatory Framework

Federal

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore federal regulations are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

State

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore state regulations are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

Local

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore local regulations are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

4.3.3 Impacts and Mitigation

Issue 1 – Historical Resources

Cultural Resources Issue 1 Summary	
Would implementation of the 2009 WRMP Update cause a substantial adverse change in the significance of an historical resource as defined in Section 15064.5?	
Impact: Implementation of a historical building assessment prior to demolition of PS 657-1 and PS 850-1, and a subsequent documentation/treatment program as necessary, would reduce impacts to potential historical resources.	**Mitigation:** No further mitigation is required.
Significance Before Mitigation: Less than significant.	**Significance After Mitigation:** No Impact.

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore the historical resources setting is identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

Issue 2 – Archaeological Resources

Cultural Resources Issue 2 Summary	
Would implementation of the 2012 WRMP Update cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	
Impact: Ground disturbance associated with construction of certain CIP projects under the 2012 WRMP Update has the potential to impact potentially significant unknown archaeological resources.	**Mitigation:** Implementation of a cultural resources monitoring and data recovery program by a qualified archaeologist (Cul-2A through Cul-2C).
Significance Before Mitigation: Potentially Significant.	**Significance After Mitigation:** Less than Significant.

Impact Analysis

It is assumed that ground disturbing activities associated with the WWMP Projects are similar to those in the 2009 WRMP Update. This section contained within the 2010 PEIR, would not need further updating. That information is hereby incorporated by reference (Otay 2010).

Issue 3 – Human Remains

Cultural Resources Issue 3 Summary	
Would implementation of the 2012 WRMP Update disturb any human remains, including those interred outside of formal cemeteries?	
Impact: Native American or other human remains could be encountered during ground disturbance associated with construction of certain CIP projects under the 2012 WRMP Update; however, compliance with the California Health and Safety Code (Cul-SCP-1) would reduce impacts associated with discovery of human remains.	**Mitigation:** No mitigation is required.
Significance Before Mitigation: Less than significant.	**Significance After Mitigation:** Less than significant.

Impact Analysis

Comparable to the 2009 WRMP Update, the WWMP would not result in any significant impacts to Archaeological Resources or Human Remains if mitigation measures and PDFs/SCPs are followed. That information is hereby incorporated by reference (Otay 2010).

4.3.4 Cumulative Impacts and Mitigation

Cultural Resources Cumulative Issue Summary

Would implementation of the 2012 WRMP Update have a cumulatively considerable contribution to a cumulative cultural resources impact considering past, present, and probable future projects?

Cumulative Impact	Significant	WRMP Contribution
Regional loss of archaeological resources.	Yes	Not cumulatively considerable with implementation of measures Cul-2A through Cul-2C.
Regional loss of Native American human remains	Yes	Not cumulatively considerable with implementation of Cul-SCP-1.

Impact Analysis

Comparable to the 2009 WRMP Update, the WWMP would not result in any cumulatively significant impacts to Archaeological Resources or Human Remains if mitigation measures and PDFs/SCPs are followed. That information is hereby incorporated by reference (Otay 2010).

4.3.5 CEQA Checklist Items Deemed Not Significant or Not Applicable to the 2012 WRMP Update

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore CEQA Checklist Items Deemed Not Significant or Not Applicable to the 2012 WRMP Update are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

4.4 Energy

Public Resources Code Section 21100(b)(3), CEQA Guidelines Section 15126.4, and CEQA Appendix F Energy Conservation require an analysis of the proposed project's energy consumption, to determine if the construction and operation of the project would employ a wise and efficient use of energy. An analysis of the proposed project's energy usage was included in the 2010 PEIR, Section 4.4 – Energy (Otay 2010).

This section of the SPEIR is intended to supplement the previous information and analysis contained within the corresponding section of the 2010 PEIR. For the analysis of the WWMP, some of the original analysis within the PEIR was not significantly changed and therefore does not need additional analysis/updating. That information is hereby incorporated by reference (Otay 2010).

Energy usage by the proposed project is also a consideration in assessing project impacts to global climate change. For further discussion of this issue, please refer to Section 4.1, Air Quality and Global Climate Change in this SPEIR and/or in the 2010 PEIR.

4.4.1 Environmental Setting

Existing Conditions

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore existing conditions are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

4.4.2 Regulatory Framework

State

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore the regulations are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

4.4.3 Impacts and Mitigation

Issue 1 – Energy Consumption

Energy Issue 1 Summary	
Would implementation of the 2012 WRMP Update result in the inefficient, wasteful, and unnecessary use of energy?	
Impact: The construction and operation of CIP projects under the 2012 WRMP Update would result in the consumption of energy, however, implementation of energy efficient measures (Ene-PDF-1, Ene-PDF-2, Ene- PDF-3, and Ene-PDF-4) at WMMP CIP projects would ensure that energy use would not be inefficient, wasteful, or unnecessary.	**Mitigation:** No mitigation is required.
Significance Before Mitigation: Less than significant.	**Significance After Mitigation:** Less than significant.

Impact Analysis

Project Construction. Without further details regarding site conditions and specific equipment to be used, it is assumed that construction and/or demolition activities associated with all of the WWMP Projects are similar to those described within the 2009 WRMP Update (Otay 2010). Therefore, further analysis is not required.

Project Operation. Traffic generations associated with implementation of the WWMP are not anticipated to be significantly different to that analyzed in the 2010 PEIR and so the impact associated with energy for the 201 PEIR are incorporated by reference.

In the 2010 PEIR, it was determined that the proposed pump stations would demand the most energy. Under each alternative of the WWMP, improvements to the existing Rancho San Diego pump station (PS) are proposed. Since the Rancho San Diego PS is already in service, it would not require any more energy demand. Improvements would most likely make the pumps run more efficiently, thus reducing energy consumption.

Alternatives 3 and 4 propose expanding wastewater treatment capabilities of the RWCWRF (Otay 2012). This would result in an increase in energy demand however this increase can be comparable to the energy requirements of the larger pump stations previously analyzed in the 2010 PEIR. Those pump stations, with their associated Project Design Features (Ene-PDF-1 through Ene-PDF-4), were determined to have a less than significant impact to Energy.

Therefore an expansion of the RWCWRF would not represent a significant increase in energy consumption and would also be less than significant. Refer to Section 4.4.3.1, pp. 4.4-2 to 4.4-4 in the 2010 PEIR for impact analysis and required PDFs (Otay 2010).

4.4.4 Cumulative Impacts and Mitigation

Energy Cumulative Issue Summary

Would implementation of the 2012 WRMP Update have a cumulatively considerable contribution to the inefficient, wasteful, and unnecessary use of energy considering past, present, and probable future projects?

Cumulative Impact	Significant	WRMP Contribution
Energy Consumption	No	Not cumulatively considerable with implementation of measures Ene-PDF-1 through Ene-PDF-4.

Impact Analysis

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore the energy usage is identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

4.4.5 CEQA Checklist Items Deemed Not Significant or Not Applicable to the 2012 WRMP Update

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore CEQA Checklist Items Deemed Not Significant or Not Applicable to the 2012 WRMP Update are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

4.5 Geology, Soils, and Paleontology

The 2010 PEIR for the 2009 WRMP Update described existing conditions within the planning area with respect to geology and soils, seismicity, and paleontological sensitivity; the potential physical environmental effects (direct, indirect, and/or cumulative) related to these issues resulting from development of projects under the WWMP; and the project design features, standard construction practices, and mitigation/ performance measures to reduce or avoid the identified impacts (Otay 2010).

This section of the SPEIR is intended to supplement the previous information and analysis contained within the corresponding section of the 2010 PEIR. For the analysis of the WWMP, some of the original analysis within the PEIR was not significantly changed and therefore does not need additional analysis/updating. That information is hereby incorporated by reference (Section 4.5.1 – Environmental Setting and 4.5.2 – Regulatory Framework, pp. 4.5-1 to 4.5-12) (Otay 2010).

4.5.1 Environmental Setting

Geology

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore existing conditions are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

Soils and Related Hazards

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore existing conditions are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

Seismic Hazards

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore existing conditions are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

Paleontology

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore existing conditions are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

4.5.2 Regulatory Framework

Federal Regulations

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore regulations are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

State Regulations

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore regulations are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

Local Regulations

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore regulations are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

4.5.3 Impacts and Mitigation

Issue 1 – Exposure to Seismic-Related Hazards

Geology, Soils, and Paleontology Issue 1 Summary	
Would implementation of the 2012 WRMP Update expose people or structures to potential substantial adverse effects of a rupture of a known earthquake fault, strong seismic ground shaking, seismic-related ground failure, liquefaction or landslides?	
Impact: Compliance with UBC and CBC standards and CDMG's Special Publications 117 (Geo-PDF-1), and implementation of recommendations provided in site-specific geotechnical investigations (Geo-SCP-1), would minimize impacts associated with seismic-related ground shaking, ground failure, liquefaction, and landslides.	**Mitigation**: No mitigation is required.
Significance Before Mitigation: Less than significant.	**Significance After Mitigation**: Less than significant.

Impact Analysis

Design and construction of projects associated with the WWMP Projects would be similar to those in the 2009 WRMP Update. They would comply with all applicable PDFs/SCPs and would conduct a pre-construction geotechnical investigation before any work begins. This corresponding section contained within the 2010 PEIR, would not need further analysis or updating. Refer to Section 4.5.3.1, pp. 4.5-13 to 4.3-15 in the 2010 PEIR for impact analysis and required PDFs/SCPs (Otay 2010).

Issue 2 – Soil Erosion or Top Soil Loss

Geology, Soils, and Paleontology Issue 2 Summary	
Would implementation of the 2012 WRMP Update result in substantial soil erosion or the loss of topsoil?	
Impact: Compliance with UBC and CBC standards (Geo-PDF-1), implementation of recommendations provided in site-specific geotechnical investigations, and implementation of standard erosion control measures (Geo-SCP-2 and Geo-SCP-3) would reduce impacts associated with soil erosion and loss of topsoil.	**Mitigation:** No mitigation is required.
Significance Before Mitigation: Less than significant.	**Significance After Mitigation:** Less than significant.

Impact Analysis

Earth-disturbing activities during construction of WWMP projects would be very similar to those in the 2009 WRMP Update. If erodible soils are found in the project footprint during the pre-construction geotechnical investigation, then PDFs/SCPs comparable to the ones within the 2010 PEIR would be implemented (Otay 2012). In addition to the ones contained with Section 4.5.3.1, an Erosion Control Plan or a Storm Water Pollution Prevention Plan (SWPPP) with associated Best Management Practices (BMPs) would be designed and implemented. After construction is completed, operational activities associated with the WWMP would follow all applicable PDFs/SCPs to ensure minimal impacts to soil erosion or the loss of topsoil. This corresponding section contained within the 2010 PEIR, would not need further analysis or updating. Refer to Section 4.5.3.2, pp. 4.5-15 to 4.3-18 in the 2010 PEIR for impact analysis and required PDFs/SCPs (Otay 2010).

Issue 3 – Geology/Soil Instability

Geology, Soils, and Paleontology Issue 3 Summary	
Would any of the CIP projects under the 2012 WRMP Update be located on a geologic unit or soil that is unstable or that would become unstable and potentially result in landslides, lateral spreading, subsidence, liquefaction, or collapse?	
Impact: Implementation of recommendations provided in site-specific geotechnical investigations (Geo-SCP-1 and Geo-SCP-4) would reduce impacts associated with geologic/soil instability (landslides, lateral spreading, liquefaction/collapse).	**Mitigation**: No mitigation is required.
Significance Before Mitigation: Less than significant.	**Significance After Mitigation:** Less than significant.

Impact Analysis

The WWMP planning area, like many parts of southern California, has a high likelihood of geologic instability. A pre-construction geotechnical investigation would be conducted at the project site to identify any unstable geologic formations or soils before any work has begun (Otay 2012). All potential WWMP Projects would follow all necessary 2010 PEIR PDFs/SCPs to ensure that impacts due to geologic/soil instability would be minimized. This corresponding section contained within the 2010 PEIR, would not need further analysis or updating. Refer to Section 4.5.3.3, pp. 4.5-18 to 4.3-20 in the 2010 PEIR for impact analysis and required PDFs/SCPs (Otay 2010).

Issue 4 – Expansive Soils

Geology, Soils, and Paleontology Issue 4 Summary	
Would any of the CIP projects under the 2012 WRMP Update be located on expansive soils creating substantial risks to life or property?	
Impact: Implementation of recommendations provided in site-specific geotechnical investigations (Geo-SCP-1 and Geo-SCP-4) would reduce impacts associated with expansive soils.	**Mitigation**: No mitigation is required.
Significance Before Mitigation: Less than significant.	**Significance After Mitigation:** Less than significant.

Impact Analysis

The potential for expansive soils exists throughout portions of the WWMP planning area. A pre-construction geotechnical investigation would be conducted to identify any expansive soils before any work has begun (Otay 2010). All potential WWMP Projects would follow all necessary 2010 PEIR PDFs/SCPs to ensure that impacts due to expansive soils would be minimized. This corresponding section contained within the 2010 PEIR, would not need further analysis or updating. Refer to Section 4.5.3.4, pp. 4.5-20 to 4.3-21 in the 2010 PEIR for impact analysis and required PDFs/SCPs (Otay 2010).

Issue 5 – Paleontological Resources

Geology, Soils, and Paleontology Issue 5 Summary ***Would implementation of the 2012 WRMP Update directly or indirectly destroy a unique paleontological resource or site?***	
Impact: Implementation of the 2012 WRMP Update could impact potential paleontological resources within the planning area.	**Mitigation:** Implementation of a paleontological resources monitoring and data recovery program by a qualified paleontologist (Geo-5A through Geo-5D).
Significance Before Mitigation: Significant.	**Significance After Mitigation:** Less than Significant.

Impact Analysis

Figure 4.5-5 in the 2010 PEIR shows that portions of the WWMP planning area are underlain by geologic formations that have the potential to contain fossils (Otay 2010). These formations would only be impacted if WWMP project construction activities require excavation into native soils, rather than fill. With implementation of the mitigation measures within the 2010 PEIR, impacts to potential paleontological resources would be minimized. This corresponding section contained within the 2010 PEIR, would not need further analysis or updating. Refer to Section 4.5.3.5, pp. 4.5-21 to 4.3-22 in the 2010 PEIR for impact analysis and required mitigation measures (Otay 2010).

4.5.4 Cumulative Impacts and Mitigation

Geology, Soils and Paleontology Cumulative Issue Summary

Would implementation of the 2012 WRMP Update have a cumulatively considerable contribution to cumulative geology/soils impacts considering past, present, and probable future projects?

Cumulative Impact	**Significant**	**WRMP Contribution**
Localized soil erosion or loss of topsoil in affected watersheds due to development.	Yes	Not cumulatively considerable with implementation of Geo-PDF-1, Geo-SCP-2 and Geo-SCP-3.
Regional loss of paleontological resources.	Yes	Not cumulatively considerable with implementation of mitigation/performance measures Geo-5A through Geo-5D.

Impact Analysis

Comparable to the 2009 WRMP Update, the WWMP would not result in a cumulatively considerable contribution to soil erosion/loss of topsoil, or a loss of paleontological resources within the local

cumulative impact areas if the PDFs/SCPs and mitigation measures are followed. Refer to Section 4.4.5, pp. 4.5-23 to 4.5-24 in the 2010 PEIR for more detailed analysis (Otay 2010).

4.5.5 CEQA Checklist Items Deemed Not Significant or Not Applicable to the 2012 WRMP Update

Like the 2009 WRMP Update, the WWMP would not involve the use of septic tanks or other alternative wastewater disposal systems (Otay 2012); therefore, no further evaluation is necessary. Refer to Section 4.5.5, p. 4.5-24 in the 2010 PEIR for more detailed analysis (Otay 2010).

4.6 Hydrology and Water Quality

The 2010 PEIR for the 2009 WRMP Update described existing conditions within the WRMP planning area with respect to hydrology and water quality; the potential physical environmental effects (direct, indirect, and/or cumulative) related to these issues resulting from development of projects under the WWMP; and the project design features, standard construction practices, and mitigation/performance measures to reduce or avoid the identified impacts (Otay 2010).

This section of the SPEIR is intended to supplement the previous information and analysis contained within the corresponding section of the 2010 PEIR. For the analysis of the WWMP, the original analysis within the PEIR is not significantly changed and therefore does not need additional analysis/updating. That information is hereby incorporated by (Otay 2010).

4.6.1 Environmental Setting

Hydrology

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore hydrology is identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

Surface Water Quality

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore surface water quality is identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

Groundwater

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore groundwater conditions are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

4.6.2 Regulatory Framework

Federal

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore the regulations are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

State

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore the regulations are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

Local

The construction and operation of the CIP projects identified in the WWMP fall wholly within the

Northeast corner of the 2009 WRMP Update area. Therefore the regulations are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

4.6.3 Impacts and Mitigation

Issue 1 – Water Quality

Hydrology and Water Quality Issue 1 Summary	
Would the 2012 WRMP Update violate any water quality standards or waste discharge requirements, or otherwise substantially degrade water quality?	
Impact: Implementation of standard erosion control measures (Geo-SCP-2 and Geo-SCP-3), construction-related safety plans (Hyd-SCP-1), and OWD HMBPs for CIP operations (Hyd-PDF-1) would reduce impacts associated with potential violation of water quality standards or waste discharge requirements, and potential water quality degradation resulting from construction and operation of CIP projects under the 2012 WRMP Update.	**Impact:** Implementation of standard erosion control measures (Geo-SCP-2 and Geo-SCP-3), construction-related safety plans (Hyd-SCP-1), and OWD HMBPs for CIP operations (Hyd-PDF-1) would reduce impacts associated with potential violation of water quality standards or waste discharge requirements, and potential water quality degradation resulting from construction and operation of CIP projects under the 2012 WRMP Update.
Significance Before Mitigation: Less than significant.	**Significance Before Mitigation:** Less than significant.

Impact Analysis

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore the water quality is identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

Issue 2 – Groundwater Quality, Supplies, and Recharge

Hydrology and Water Quality Issue 2 Summary	
Would the 2012 WRMP Update substantially degrade groundwater quality, or interfere substantially with groundwater supplies or recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table?	
Impact: Implementation of standard erosion control measures (Geo-SCP-2 and Geo-SCP-3), construction- related safety plans (Hyd-SCP-1), and OWD HMBPs for CIP operations (Hyd-PDF-1) would reduce potential groundwater quality impacts due to storm water runoff pollution associated with construction and long-term operations at WMMP CIP projects. In addition, there would be no impacts to groundwater supplies and recharge from implementation of the CIP projects under the 2012 WRMP Update.	**Mitigation:** No mitigation is required.
Significance Before Mitigation: Less than significant.	**Significance After Mitigation:** Less than significant.

Impact Analysis

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore the water quality is identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

Issue 3 – Alteration of Drainage Patterns

Hydrology and Water Quality Issue 3 Summary	
Would the 2012 WRMP Update substantially alter existing drainage patterns, including the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would provide substantial additional sources of polluted runoff (including erosion/siltation); result in flooding (and exposure of people or structures to a significant risk of loss, injury or death); or exceed the capacity of storm water drainage systems?	
Impact: Implementation of standard erosion control measures (Geo-SCP-2 and Geo-SCP-3), construction-related safety plans (Hyd-SCP-1), OWD HMBPs for CIP operations (Hyd-PDF-1), and appropriately sized drainage facilities (Hyd-PDF-2) would reduce impacts from potential storm water runoff pollution (including erosion/siltation), flooding, and exceedance of capacity of storm water drainage facilities due to alteration of localized drainage patterns associated with construction, development and long-term operations of CIP projects under the 2012 WRMP Update.	**Mitigation:** No mitigation is required.
Significance Before Mitigation: Less than significant.	**Significance After Mitigation:** Less than significant.

Impact Analysis

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore the water quality is identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

Issue 4 – Mudflows

Hydrology and Water Quality Issue 4 Summary	
Would any of the CIP projects under the 2012 WRMP Update have the potential to be inundated by mudflow?	
Impact: Implementation of recommendations provided in site-specific geotechnical investigations (Geo-SCP-1), would reduce potential impacts associated with mudflows.	**Mitigation:** No mitigation is required.
Significance Before Mitigation: Less than significant.	**Significance After Mitigation:** Less than significant.

Impact Analysis

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore the water quality is identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

4.6.4 Cumulative Impacts and Mitigation

Hydrology and Water Quality Cumulative Issue Summary

Would implementation of the 2012 WRMP Update have a cumulatively considerable contribution to a cumulative hydrology and water quality impact considering past, present, and probable future projects?

Cumulative Impact	Significant	WRMP Contribution
Regional increase in pollutant sources that could adversely affect water quality standards.	Yes	Not cumulatively considerable with implementation of Geo-PDF-1, Geo-SCP-2, Geo-SCP-3, Hyd-SCP-1, and Hyd-PDF-1.
Localized impacts to groundwater quality and supplies/recharge.	Yes	Not cumulatively considerable with implementation of Geo-PDF-1, Geo-SCP-2, Geo-SCP-3, Hyd-SCP-1, and Hyd-PDF-1.
Regional impacts to surface and groundwater quality, groundwater supplies/recharge, flooding, and exceedance of capacity of storm water drainage facilities due to alteration of localized drainage patterns.	Yes	Not cumulatively considerable with implementation of Geo-PDF-1, Geo-SCP-2, Geo-SCP-3, Hyd-SCP-1, Hyd-PDF-1, and Hyd-PDF-2.

Impact Analysis

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore the energy usage is identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

4.6.5 CEQA Checklist Items Deemed Not Significant or Not Applicable to the 2012 WRMP Update

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore CEQA Checklist Items Deemed Not Significant or Not Applicable to the 2012 WRMP Update are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

4.7 Landform Alteration and Visual Aesthetics

The 2010 PEIR for the 2009 WRMP Update described existing conditions within the WRMP planning area with respect to landform alteration and visual aesthetics; the potential physical environmental effects (direct, indirect, and/or cumulative) related to these issues resulting from development of projects under the WWMP; and the project design features, standard construction practices, and mitigation/performance measures to reduce or avoid the identified impacts (Otay 2010). Potential indirect impacts of night lighting to biological resources were discussed in Section 4.2 (Biological Resources) of the PEIR and in this SPEIR.

This section of the SPEIR is intended to supplement the previous information and analysis contained within the corresponding section of the 2010 PEIR. For the analysis of the WWMP, some of the original analysis within the PEIR was not significantly changed and therefore does not need additional analysis/updating. That information is hereby incorporated by reference (Section 4.7.1 – Environmental Setting and 4.7.2 – Regulatory Framework, pp. 4.7-1 to 4.7-5) (Otay 2010).

4.7.1 Environmental Setting

North District

Hillsdale System

The construction and operation of the CIP projects identified in the WWMP fall wholly within this area of the 2009 WRMP Update area. Therefore existing conditions are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

4.7.2 Regulatory Framework

Federal and State Regulations

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore the regulations are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

Local Policies and Ordinances

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore the regulations are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

4.7.3 Impacts and Mitigation

Issue 1 – Scenic Vistas

Aesthetics Issue 1 Summary	
Would any of the CIP projects under the 2012 WRMP Update have a substantial adverse effect on a scenic vista?	
Impact: Implementation of AesPDF-1 would reduce the visual impacts of WMMP CIP Projects on scenic vistas.	**Mitigation:** No mitigation is required.
Significance Before Mitigation: Less than significant.	**Significance After Mitigation:** Less than significant

Impact Analysis

Impacts for the 2012 WRMP Update CIP projects were determined to be less than significant after implementation of the PDF (Otay 2010). It is unlikely if any of the projects under the WWMP would have any substantial adverse effect to scenic vistas; however, all projects would follow the same PDF. This corresponding section contained within the 2010 PEIR, would not need further analysis or updating. Refer to Section 4.7.3.1, pp. 4.7-6 to 4.7-10 in the 2010 PEIR for impact analysis and required PDF (Otay 2010).

Issue 2 – Visual Character and Quality

Aesthetics Issue 2 Summary	
Would any of the CIP projects under the 2012 WRMP Update substantially degrade the existing visual character or quality of the project sites and their surroundings?	
Impact: Implementation of OWD's standard requirements for landscaping and using natural color palettes for building materials (AesPDF-1) would ensure that the CIP projects would not degrade the existing visual character of the project sites and their surroundings.	**Mitigation:** No mitigation is required.
Significance Before Mitigation: Less than significant.	**Significance After Mitigation:** Less than significant.

Impact Analysis

Similar to CIP projects under the 2009 WRMP Update, projects associated with the WWMP would all have visual impacts due to site disturbance and construction. However, these impacts would be temporary with implementation of the required PDF after construction is completed. Complying with the required PDF and any subsequent mitigation measures from future project-specific CEQA documents would reduce any visual impacts to a level of less than significance. This corresponding section contained within the 2010 PEIR, would not need further analysis or updating. Refer to Section 4.7.3.2, pp. 4.7-11 to 4.7-14 in the 2010 PEIR for impact analysis and required PDF (Otay 2010).

Issue 3 – Lighting and Glare

Aesthetics Issue 3 Summary	
Would any of the CIP projects under the 2012 WRMP Update create a new source of substantial light or glare which would adversely affect day or nighttime views in the immediate vicinity of the CIP projects?	
Impact: Implementation of Aes-PDF-1 would reduce the impact of new sources of substantial light or glare in association with CIP projects which could adversely affect day and nighttime views nearby.	**Mitigation:** No mitigation is required.
Significance Before Mitigation: Less than significant.	**Significance After Mitigation:** Less than significant.

Impact Analysis

Expansion of current existing facilities under the WWMP, such as the RWCWRF, would create a new source of light/glare (Otay 2012). These impacts are no different to impacts from light/glare of CIP

projects previously discussed within the 2010 PEIR. WWMP projects would conform to the required PDF to reduce impacts to a level of less than significance. This corresponding section contained within the 2010 PEIR, would not need further analysis or updating. Refer to Section 4.7.3.3, pp. 4.7-15 in the 2010 PEIR for impact analysis and required PDF (Otay 2010).

4.7.4 Cumulative Impacts and Mitigation

Aesthetics Cumulative Issue Summary

Would implementation of the 2012 WRMP Update have a cumulatively considerable contribution to a cumulative aesthetic impact considering past, present, and probable future projects?

Cumulative Impact	Significant	WRMP Contribution
Local degradation of scenic vistas.	Yes	Not cumulatively considerable with implementation of AesPDF-1.
Local degradation of visual character.	Yes	Not cumulatively considerable with implementation of AesPDF-1.

Impact Analysis

In contrast to the 2009 WRMP Update, it is presumed that the WWMP would not result in any cumulatively significant impacts to scenic vistas and visual character/quality, even before compliance with the required PDFs. The only potential new buildings associated with the WWMP, would be the expansion of the existing RWCWRF (Otay 2012). Any impacts from light/glare are considered localized and is not addressed in this section. Refer to Section 4.7.4, pp. 4.7-16 to 4.3-17 in the 2010 PEIR for more detailed analysis (Otay 2010).

4.7.5 CEQA Checklist Items Deemed Not Significant or Not Applicable to the 2012 WRMP Update

Would implementation of any projects under the WWMP substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

No officially designated State scenic highways occur within the planning area. Implementation of the WWMP will not change previous impact analysis of the 2010 PEIR for the 2009 WRMP Update, which stated that there would be no impact to any scenic resources. Refer to Section 4.7.5, p. 4.7-17 in the 2010 PEIR for further analysis (Otay 2010).

4.8 Land Use and Planning

The 2010 PEIR for the 2009 WRMP Update described existing conditions within the WRMP planning area with respect to land use and planning. In addition, potential physical environmental effects (direct, indirect, and/or cumulative) related to these issues resulting from development projects under the WWMP, project design features, standard construction practices, and mitigation/performance measures to reduce or avoid the identified impacts are described (Otay 2010).

This section of the SPEIR is intended to supplement the previous information and analysis contained within the corresponding section of the 2010 PEIR. For the analysis of the WWMP, some of the original analysis within the PEIR was not significantly changed and therefore does not need additional analysis/updating. That information is hereby incorporated by reference (Section 4.8.1 – Existing Land Uses and 4.8.2 – Regulatory Framework, pp. 4.8-1 to 4.8-8) (Otay 2010).

4.8.1 Environmental Setting

Existing Conditions

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore existing conditions are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

4.8.2 Regulatory Framework

State

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore the regulations are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

Local

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore the regulations are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

4.8.3 Impacts and Mitigation

Issue 1 – Conflicts with Habitat Conservation and Natural Communities Conservation Plans

Land Use Issue 1 Summary	
Would the 2012 WRMP Update conflict with any applicable habitat conservation plan (HCP) or natural communities conservation plan (NCCP)?	
Impact: Design of CIP projects incorporating MSCP land use adjacency guidelines of the County of San Diego (LU- PDF-1), City of San Diego (LU-PDF-2), and City of Chula Vista MSCP (LU-PDF-3), compliance with exterior noise limits (Noi-PDF-1), and pre-construction surveys (Bio-1C) would reduce indirect impacts to biological resources that would otherwise conflict with applicable HCPs and NCCPs.	**Mitigation:** No mitigation is required.

Significance Before Mitigation: Less than significant.	**Significance After Mitigation:** Less than significant.

Impact Analysis

It is not currently known if any of the associated projects under the WWMP would be located in or adjacent to lands under a Habitat Conservation Plan (HCP), a Natural Communities Conservation Plan (NCCP), or a Multiple Species Conservation Plan (MSCP) (Otay 2012). If however, a project is placed in, near or adjacent to a known habitat preserve area, it shall follow all applicable PDFs and mitigation measures from the 2010 PEIR for the 2009 WRMP Update. These would ensure that all respective land use agency guidelines of the County of San Diego, City of San Diego, and the City of Chula Vista pertaining to HCPs, NCCPs, and MSCPs are incorporated into the project design (Otay 2010). Implementing these PDFs and mitigation measures would reduce any potential impacts to natural communities to a level of less that significant (Otay 2010).

4.8.4 Cumulative Impacts and Mitigation

Land Use and Planning Cumulative Issue Summary

Would implementation of the 2012 WRMP Update have a cumulatively considerable contribution to a cumulative land use and planning impact considering past, present, and probable future projects?

Cumulative Impact	Significant	WRMP Contribution
Conflicts with regional HCPs/NCCPs, in terms of indirect impacts to biological resources in MSCP reserves.	Yes	Not cumulatively considerable with implementation of LU-PDF-1, LU-PDF-2, LU-PDF-3, and LU-SCP-1.

Impact Analysis

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore the cumulative impacts and mitigation are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010). Cumulative impacts are evaluated for environmental issues for which the impacts associated with implementation of the WWMP would be significant or less than significant. Since implementation of the 2012 WRMP Update would not physically divide an established community or conflict with any land use plan, policy or regulation of the County of San Diego, the City of San Diego, or the City of Chula Vista, these issues are not addressed in this section.

Comparable to the 2009 WRMP Update, land disturbances and the construction of projects associated with the WWMP may result in impacts to biological resources in or adjacent to protected natural communities, such as HCPs or MSCPs (e.g., from downstream siltation, stormwater runoff, lighting, noises). For these reasons, the cumulative impact to natural communities from the implementation of the WWMP could be significant; however, if the above mentioned PDFs and mitigation measures (from the 2010 PEIR) are followed then any WWMP projects would not result in regionally cumulative impacts. Refer to Section 4.8.4, pp. 4.8-10 to 4.8-11 in the 2010 PEIR for more detailed analysis (Otay 2010).

4.8.5 CEQA Checklist Items Deemed Not Significant or Not Applicable to the 2012 WWMP Supplement

Would implementation of any of the projects under the WWMP physically divide an established

community?

The WWMP is not anticipated to create a physical divide between established communities as the pipes associated with the plan are anticipated to be buried underground and the plants are not anticipated to be large enough as to create a divide.

Would implementation of the WWMP conflict with any land use plan, policy or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Subsections (d) and (e) within Section 53901 of the California Government Code state that local agency zoning ordinances (and by inference the planning policies of local land use agencies) do not apply to the location or construction of facilities for the production, generation, storage, treatment, or transmission of water. Therefore, implementation of the WWMP would not conflict with any land use plan, policy, or regulation of the County of San Diego, the City of San Diego, or the City of Chula Vista. Furthermore, as outlined in Section 4.8.2.2 above, there are many policies within these agency general plans that support the provision of water infrastructure. Therefore, no further analysis is required.

4.9 Noise

The 2010 PEIR for the 2009 WRMP Update described existing conditions within the planning area with respect to noise; the potential physical environmental effects (direct, indirect, and/or cumulative) related to these issues resulting from development projects under the WWMP; and the project design features, standard construction practices, and mitigation/performance measures to reduce or avoid the identified impacts. Refer to Section 4.2 (Biological Resources) of this SPEIR for a discussion of potential noise impacts associated with noise-sensitive avian species (Otay 2010).

This section of the SPEIR is intended to supplement the previous information and analysis contained within the corresponding section of the 2010 PEIR. For the analysis of the WWMP, some of the original analysis within the PEIR was not significantly changed and therefore does not need additional analysis/updating. That information is hereby incorporated by reference (Section 4.9.1 – Environmental Setting and 4.9.2 – Regulatory Framework, pp. 4.9-1 to 4.9-8) (Otay 2010).

4.9.1 Environmental Setting

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore the environmental setting with respect to noise is identical to the 2012 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

4.9.2 Regulatory Framework

Federal

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore the regulations are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

State

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore the regulations are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

Local

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore the regulations are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

4.9.3 Impacts and Mitigation

Issue 1 – Substantial Permanent Increases in Ambient Noise Levels

Noise Issue 1 Summary	
Would implementation of the 2012 WRMP Update result in a substantial permanent increase in ambient noise levels or expose persons to noise in excess of standards?	
Impact: Implementation of project design feature Noi-PDF-1 would reduce potential operational noise sources from CIP pump stations and water supply projects to the noise level limits established by the applicable jurisdictions.	**Mitigation:** No mitigation is required.
Significance Before Mitigation: Less than significant.	**Significance After Mitigation:** Less than significant.

Impact Analysis

The 2009 WRMP Update dealt with CIP projects, such as pump stations, which are a significant source of long-term noise (Otay 2010). A potential project under the WWMP that could be a source of substantial permanent increases in noise levels is the expansion of the RWCWRF to meet the District's increased wastewater demands (Otay 2012). The current RWCWRF represents a significant source of noise to the surrounding area with pumps, machinery, and associated worker vehicle trips.

An expansion of this wastewater facility has the potential to be an even more significant source of operational noise; however, with implementation of the Noi-PDF-1 from the 2010 PEIR, this would ensure that exterior noise levels from the facility are not above jurisdictional thresholds to the surrounding land uses (Otay 2010). Another potential permanent noise source could come in the form of increased worker daily trips due to an expanded facility needing more workers. It is not known at this time if an expansion of the RWCWRF would need more workers. If it did, it is likely that workers would work on staggered work schedules, thus reducing any increase in traffic noise. Any impacts due to the amount of worker trips necessary with an upgraded treatment plant would be analyzed if the plant is upgraded, but would expect to be such a negligible impact, that it is not considered significant.

With the use of Noi-PDF-1 from the 2010 PEIR and other associated measures, impacts from substantial permanent increases in ambient noise levels would be less than significant. Refer to Section 4.9.3.1, pp. 4.9-8 to 4.9-11 in the 2010 PEIR for more detailed analysis (Otay 2010).

Issue 2 – Temporary Increases in Ambient Noise

Noise Issue 2 Summary	
Would implementation of the 2012 WRMP Update result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity?	
Impact: Although construction of CIP projects would temporarily increase ambient noise levels in the project vicinity, Noi-SCP-1 would ensure compliance with applicable local noise ordinances and regulations, and Noi-SCP-2 would require implementation of the OWD Standard Specifications for Explosives and Blasting. Implementation of these SCPs would reduce impacts associated with temporary increases in ambient noise.	**Mitigation:** No mitigation is required.
Significance Before Mitigation: Less than significant.	**Significance After Mitigation:** Less than significant.

Impact Analysis

Like the projects associated with the 2009 WRMP Update, many planned projects within the WWMP would result in temporary increases in ambient noise levels due to construction. Construction activities associated with WWMP projects would also be very similar to the construction of the projects within the 2009 WRMP Update, except that it is unlikely that any WWMP projects would require blasting as a means of construction (Otay 2010; 2012). At this time though, many projects and features of the WWMP are still in the design phase, and information regarding the specific number and type of construction equipment required and duration is still unknown. Therefore, it is unknown whether or not construction for the WWMP (individually or collectively) would exceed the noise levels established by applicable noise ordinances. With implementation of the Noi-SCP-1 contained within the 2010 PEIR, temporary noise impacts from construction would be less than significant. Refer to Section 4.9.3.2, pp. 4.9-11 to 4.9-13 in the 2010 PEIR for further detailed impact analysis and the required SCP (Otay 2010).

Issue 3 – Excessive Groundborne Vibration or Noise

Noise Issue 4 Summary	
Would implementation of the 2012 WRMP Update result in the exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	
Impact: Construction of CIP projects may temporarily result in excessive groundborne vibration and noise that may affect surrounding land uses. However, implementation of the OWD Standard Specifications for Explosives and Blasting (Noi-SCP-2) would reduce groundborne vibration from construction activities.	**Mitigation:** No mitigation is required.
Significance Before Mitigation: Less than significant.	**Significance After Mitigation:** Less than significant.

Impact Analysis

The construction of projects associated with the WWMP, like the projects associated with the 2009 WRMP Update, could result in temporary sources of vibration to surrounding land uses. One difference between the two is that it is unlikely for any WWMP projects to require blasting as a method of construction. The projects under the WWMP will follow all necessary SCPs contained within the 2010 PEIR to ensure that impacts from groundborne vibration or noise are minimized. This corresponding section contained within the 2010 PEIR, would not need further analysis or updating. Refer to Section 4.9.3.3, pp. 4.9-14 to 4.9-15 in the 2010 PEIR for impact analysis and required PDF (Otay 2010).

4.9.4 Cumulative Impacts and Mitigation

Energy Cumulative Issue Summary		
Would implementation of the 2012 WRMP Update have a cumulatively considerable contribution to the inefficient, wasteful, and unnecessary use of energy considering past, present, and probable future projects?		
Cumulative Impact	**Significant**	**WRMP Contribution**
Energy Consumption	No	Not cumulatively considerable with implementation of measures Ene-PDF-1 through Ene-PDF-4.

Impact Analysis

Noise by definition is a localized phenomenon, and decreases in magnitude as distance from the source increases.

As discussed in the previous sections, the projects associated with the WWMP, such as the expansion of the RWCWRF could potentially be a source of substantial permanent noise. However, following the recommended Noi-PDF-1 contained within the original 2010 PEIR (see Section 4.9.3.1 above) would reduce any potential substantial permanent ambient noise increase impacts to surrounding land uses and not be locally cumulatively significant. Another potential permanent noise source could come in the form of increased worker daily trips due to an expanded facility needing more workers. As discussed previously in Section 4.9.3.1, the amount of worker trips necessary with an upgraded treatment plant would be analyzed to determine if there is an impact, but would likely be such a negligible impact, that it would not be considered locally cumulatively significant either. Refer to Section 4.9.4.1, pp. 4.9-15 to 4.9-16 in the 2010 PEIR for more detailed cumulative impact analysis and required PDFs/SCPS (Otay 2010).

As mentioned previously in Section 4.9.3.2, temporary increases in ambient noise would likely occur as a result of WWMP project construction. But with implementation of the Noi-SCP-1 contained within the 2010 PEIR, temporary noise impacts from construction would be less than significant and would thus not be locally cumulatively significant either. Refer to Section 4.9.4.1, pp. 4.9-14 to 4.9-15 in the 2010 PEIR for more detailed cumulative impact analysis and required PDFs/SCPs (Otay 2010).

As mentioned previously in Section 4.9.3.3, the construction of projects associated with the WWMP, could result in temporary sources of vibration to surrounding land uses. These projects will follow all necessary SCPs contained within the 2010 PEIR to ensure that impacts from groundborne vibration or noise are minimized. Following the recommendations of the SCPs, would also ensure that impacts due to groundborne vibration would not be locally cumulatively significant. Refer to Section 4.9.4.2, pp. 4.9-16 in the 2010 PEIR for more detailed cumulative impact analysis and required PDFs/SCPs (Otay 2010).

4.9.5 CEQA Checklist Items Deemed Not Significant or Not Applicable to the 2012 WRMP Update

Would implementation of WWMP expose people residing or working in the project area to excessive noise levels resulting from aircraft?

The planning area is located within two miles of one public airport and one private airstrip. The planning area is subject to periodic aircraft and helicopter flyovers from regional airports, however, the projects under the WWMP do not contain any residential housing. Therefore, no impact would occur, and no further analysis is required.

4.10 Public Safety

This section of the SPEIR for the 2012 WRMP Update describes existing conditions within the planning area with respect to public safety; the potential physical environmental effects (direct, indirect, and/or cumulative) related to this issue resulting from development of CIP projects under the 2012 WRMP Update; and the project design features, standard construction practices, and mitigation/performance measures to reduce or avoid the identified impacts.

4.10.1 Environmental Setting

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore the environmental setting is identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

4.10.2 Regulatory Framework

Federal

The construction and operation of the CIP projects identified in the of the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore the regulations are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

State

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore the regulations are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

Local

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore the regulations are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

4.10.3 Impacts and Mitigation

Issue 1 – Transport, Use, and Disposal of Hazardous Materials and Accidental Releases

Hazards and Hazardous Materials Issue 1 Summary

Would implementation of the 2012 WRMP Update result in a significant hazard to the public or the environment through the transport, use or disposal of hazardous materials; through reasonably foreseeable upset and accident conditions involving the likely release of hazardous materials into the environment; or through hazardous emissions within one-quarter mile of an existing or proposed school?

Impact: Implementation of a Hazardous Materials Business Plan (Haz-SCP-1 and Haz-PDF-1) would reduce hazards to the public or the environment through transportation, use, and disposal of hazardous materials resulting from CIP construction and operations under the 2012 WRMP Update, and associated accidental releases of hazardous materials into the environment and near schools.	**Mitigation:** No mitigation is required.
Significance Before Mitigation: Less than significant.	**Significance After Mitigation:** Less than significant.

Impact Analysis

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore the impacts and mitigation are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

Issue 2–Listed Hazardous Materials Sites

Hazards and Hazardous Materials Issue 2 Summary ***Would implementation of the 2012 WRMP Update result in activities located on a listed hazardous materials site creating a significant hazard to the public or environment?***	
Impact: CIP construction activities could be located on or near listed hazardous materials sites resulting in a significant hazard to the public or the environment.	**Mitigation:** A Remediation Plan shall be implemented if contaminated soils or groundwater is encountered during CIP construction activities (Haz-2A).
Significance Before Mitigation: Potentially significant.	**Significance After Mitigation:** Less than significant.

Impact Analysis

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore the impacts and mitigation are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

Issue 3 – Emergency Response and Evacuation Plans

Hazards and Hazardous Materials Issue 3 Summary ***Would implementation of the 2012 WRMP Update impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?***	
Impact: Implementation of a traffic control plan (Haz-SCP-2) would reduce impacts associated with temporary, construction-related lane and road closures or detours and their potential impairment or interference with adopted emergency response and evacuation plans.	**Mitigation:** No mitigation is required.
Significance Before Mitigation: Less than significant.	**Significance After Mitigation:** Less than significant.

Impact Analysis

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore the impacts and mitigation are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

4.10.4 Cumulative Impacts And Mitigation

Public Safety Cumulative Issue Summary

Would implementation of the 2012 WRMP Update have a cumulatively considerable contribution to cumulative public safety impacts considering past, present, and probable future projects?

Cumulative Impact	Significant	WRMP Contribution
Transport, use, and disposal of hazardous materials and accidental releases into the environment and near schools.	Yes	Not cumulatively considerable with implementation of Haz-SCP-1 and Haz-PDF-1.

Impact Analysis

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore the impacts and mitigation are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

4.10.5 CEQA Checklist Items Deemed Not Significant Or Not Applicable to the 2012 WRMP Update

The construction and operation of the CIP projects identified in the WWMP fall wholly within the Northeast corner of the 2009 WRMP Update area. Therefore CEQA Checklist Items Deemed Not Significant or Not Applicable to the 2012 WRMP Update are identical to the 2009 WRMP as analyzed by the 2010 PEIR. That information is hereby incorporated by reference (Otay 2010).

CHAPTER 5.0
OTHER CEQA CONSIDERATIONS

CEQA Guidelines Section 15128 requires that an EIR disclose the reasons why various possible environmental effects of a proposed project are found not to be significant and, therefore, are not discussed in detail in the EIR. Environmental issues found to have potentially significant impacts are addressed in Chapter 4 of this SPEIR. Chapter 4 also discusses issues that were found to have no potential for a significant impact under the subsections titled "CEQA Checklist Items Found Not to be Significant or Deemed Not Applicable to the 2012 WRMP Update" found at the end of each topical section. However, several issues that were found to have no potential for a significant impact or are not applicable to the 2012 WRMP Update did not fall under the topics analyzed in Chapter 4, and are therefore discussed in Sections 5.1 and 5.2 below.

Section 15126 of the CEQA Guidelines requires that all aspects of a project be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. As part of this analysis, the following three issues are also addressed in this chapter:

- Growth-inducing impacts (Section 5.3);
- Significant environmental effects that cannot be avoided upon implementation of the 2012 WRMP Update (Section 5.4); and
- Significant irreversible environmental effects associated with implementation of the 2012 WRMP Update (Section 5.5).

5.1 Effects Found Not To Be Significant

Implementation of the 2012 WRMP Update would not result in significant impacts to agricultural resources, mineral resources, and transportation and traffic, as discussed below and, therefore, further analysis in this SPEIR is not necessary.

5.1.1 Agricultural Resources

Would implementation of the 2012 WRMP Update convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

According to the Important Farmland Map of Western San Diego County (California Resources Agency 2008), none of the CIP projects under the 2012 WRMP Update would be on land designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, no impacts to agricultural resources would occur as a result of implementation of the 2012 WRMP Update, and no further analysis is required.

Would implementation of the 2012 WRMP Update conflict with existing zoning for agricultural use, or a Williamson Act contract?

According to the California Department of Conservation, Division of Land Resource Protection, there are no portions of the planning area that are within or adjacent to a Williamson Act contract. Furthermore, pursuant to Section 53901 of the California Government Code, local agency zoning ordinances do not

apply to the location or construction of facilities for the production, generation, storage, treatment, or transmission of water; therefore, agricultural zoning would not apply to CIP projects under the 2012 WRMP Update. Accordingly, the 2012 WRMP Update would not conflict with any Williamson Act contracts or existing zoning for agricultural uses, and no further analysis is required.

Would implementation of the 2012 WRMP Update involve other changes in the existing environment, which, due to their location or nature, could result in conversion of farmland, to non-agricultural use?

Implementation of the 2012 WRMP Update would not convert agricultural lands to non-agricultural uses. Therefore, no impacts to agricultural resources would occur as a result of implementation of the 2012 WRMP Update, and no further analysis is required.

5.1.2 Mineral Resources

Would implementation of the 2012 WRMP Update result in the loss of availability of a known mineral resource that would be of value to the region and to the residents of the State, or result in the loss of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

The majority of the western portion of the planning area is designated as Mineral Resource Zone 3 (MRZ 3; mineral resources potentially present) by the County of San Diego (DPLU 2007), and portions of the Sweetwater and Otay river valleys and some of the minor drainages feeding into these rivers are designated as MRZ 2 (mineral resources present). Several of the new CIP treatment and pump stations under the 2012 WRMP Update would be constructed on disturbed sites adjacent to existing OWD facilities, and therefore would not result in the loss of potential mineral resources.

5.1.3 Transportation and Traffic

Would implementation of the 2012 WRMP Update cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?

Construction of CIP projects under the 2012 WRMP Update would generate a minor amount of daily construction-related trips from trucks hauling soil and/or demolition materials from the construction sites; trucks delivering equipment and materials to/from the construction sites; and construction workers driving to/from the construction sites. These localized increases in construction traffic would be temporary. Traffic associated with operation of the CIP projects are primarily from employee commutes. However, operation of CIP projects proposed under the 2012 WRMP Update would not generate a significant volume of new vehicle trips. The maintenance for most of the CIP projects may require approximately one visit per day by OWD employees. Such incremental increases in vehicle trips would not be substantial in relation to the existing traffic load and capacity of intersections, street segments and freeways within the planning area, and no further analysis is required.

Would implementation of the 2012 WRMP Update exceed either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?

As discussed in the preceding paragraph, the incremental increases in short-term, construction-related vehicle trips and long-term operational trips associated with the CIP projects under the 2012 WRMP Update would not be substantial in relation to the existing traffic load and capacity of the circulation system, and therefore would not exceed a level of service standard for intersections, street segments and freeways within the planning area. Since there would be no direct or cumulative traffic impacts

associated with implementation of the 2012 WRMP Update, no further analysis is required.

Would implementation of the 2012 WRMP Update result in inadequate emergency access?

Compliance with applicable building codes would ensure that any driveways or other emergency access points would be adequately provided at each CIP reservoir and pump station, where necessary. Therefore, development of CIP reservoirs and pump stations under the 2012 WRMP Update would not result in inadequate emergency access, and no further analysis is required.

Would implementation of the 2012 WRMP Update result in inadequate parking capacity?

The only parking that would be necessary at the CIP reservoirs, pump stations, and wells would be one permanent parking space for an OWD vehicle for maintenance and repair purposes. Therefore, development of CIP reservoirs and pump stations under the 2012 WRMP Update would not result in inadequate parking capacity, and no further analysis is required.

Would implementation of the 2012 WRMP Update conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?

As mentioned previously, the OWD water transmission facilities are not subject to local agency zoning requirements pursuant to Section 53901 of the California Government Code. Due to this exemption, implementation of the 2012 WRMP Update would not conflict with adopted policies, plans, or programs supporting alternative transportation, and no further analysis is required.

5.2 CEQA Checklist Items Not Applicable to the 2012 WRMP Update

The following four topics were not analyzed in Chapter 4.0 of this SPEIR because they are not applicable to the 2012 WRMP Update: population and housing, public services, recreation, and utilities and service systems. Additionally, two issues regarding transportation and traffic were found to be not applicable to the 2012 WRMP Update. The rationales for these findings are explained below.

5.2.1 Population and Housing

Implementation of the 2012 WRMP Update would not displace substantial numbers of existing housing or people, otherwise necessitating the construction of replacement housing elsewhere. Therefore, there would be no impact to housing, and no further analysis is required. The potential for the 2012 WRMP Update to induce substantial population growth, either directly or indirectly is discussed in Section 5.3 below.

5.2.2 Public Services

Implementation of the 2012 WRMP Update would not result in impacts associated with maintaining acceptable service ratios, response times or other performance objectives for fire protection services, police protection services, schools, parks, or any other public facilities. As such, implementation of the 2012 WRMP Update would not require provision of new or physically altered fire protection, police protection, school, and park facilities, the construction of which could cause significant environmental impacts. Therefore, there would be no impact to public services, and no further analysis is required.

5.2.3 Recreation

Implementation of the 2012 WRMP Update would not impact the use of parks or other recreational

facilities, such that substantial physical deterioration of the facility would occur or be accelerated, nor would it include require the construction or expansion of recreational facilities which may have an adverse physical effect on the environment. Therefore, there would be no impact to recreational facilities, and no further analysis is required.

5.2.4 Transportation and Traffic

Implementation of the 2012 WRMP Update would not change air traffic volumes that would result in substantial safety risks. Additionally, implementation of the 2012 WRMP Update would not involve any roadway or intersection improvements that could substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections). Therefore, there would be no impact to air traffic patterns or no traffic safety hazards, and no further analysis is required.

5.2.5 Utilities and Service Systems

As stated in Section 3.4.1 (Purpose, Project Description) of this SPEIR, the primary purpose of the 2012 WMMP is to supplement the 2012 WRMP Update, identify and evaluate current wastewater facilities, design feasible wastewater management strategies that allow the OWD to meet projected future wastewater needs within the OWD planning areas of influence, and to develop a phased and systematic approach to implement wastewater management strategies consistent with SANDAG forecasts, through 2030. In addition, another primary purpose of the 2012 WMMP is to ensure an adequate, reliable, flexible, and cost effective wastewater collection and treatment commensurate with growth within the planning area and adjacent areas of influence, consistent with SANDAG forecasts, through 2030. As discussed in Section 4.10 (Public Safety) of this SPEIR, all demolition debris and construction waste associated with construction of CIP projects under the 2012 WRMP Update would be properly handled and disposed of, in accordance with federal, State and local statutes and regulations related to solid waste. Moreover, the long-term operations of CIP projects under the 2012 WRMP Update would not generate solid waste that would impact the permitted capacity of area landfills.

5.3 Growth Inducement

As required by CEQA Guidelines Section 15126.2(d), an EIR must include a discussion of the ways in which a proposed project could directly or indirectly foster economic development or population growth, and how that growth would affect the surrounding environment. Growth can be induced in a number of ways, including the elimination of obstacles to growth, or through the stimulation of economic activity within the region. The discussion of the "removal of obstacles to growth" relates directly to the removal of infrastructure limitations or regulatory constraints that could result in growth unforeseen at the time of project approval. According to CEQA Guidelines Section 15126.2(d), "it must not be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment." The CEQA Guidelines require a discussion of growth inducement, but not speculation as to when, where and what form growth may occur, as such speculation does not provide the reader with accurate or useful information about the project's potential effects.

Future growth rates and associated wastewater treatment demands within the planning area were estimated within the 2012 WRMP Update to identify the CIP projects that would be needed to serve OWD customers. As discussed in Chapter 4.0 (Cumulative Impacts and Mitigation) of this SPEIR, data on future growth were obtained from SANDAG, the City of Chula Vista, and recent forecasts developed by the OWD. The following sections discuss these data sources, the growth rates estimated for the planning area, and how this data relates to direct and indirect growth inducement with regards to implementation of the 2012 WRMP Update WWMP.

5.3.1 San Diego Association of Governments

SANDAG is a regional planning agency comprised of 18 representatives from city and county governments within the San Diego area. SANDAG is the regional authority for the creation of planning, transportation, and growth forecast documents. The growth projections in the 2012 WRMP Update are based partly on SANDAG's 2004 Regional Comprehensive Plan (RCP). The RCP provides growth projections based on land use data provided by local jurisdictions, and also provides a regional framework to help guide growth and development throughout San Diego. As such, the planning horizon for both the RCP and the 2012 WRMP Update is the year 2030.

With the exception of the portion of the planning area within the City of Chula Vista, the 2012 WRMP Update utilized land use data from SANDAG as a basis for estimating and predicting future land use types and associated water consumption. As various land uses have different water requirements, these land use estimations were used to predict and size capacities for CIP projects under the 2012 WRMP Update.

5.3.2 City of Chula Vista

The southern portion of the planning area is within the jurisdiction of the City of Chula Vista. Between the time frame of the 2002 WRMP and the present 2012 WRMP Update, Chula Vista has grown by nearly 11,500 new residential units (PBS&J 2008). As such, future capacity and water consumption requirements within the portion of the planning area encompassed by Chula Vista were estimated by utilizing residential growth forecasts for the years 2008 through 2012 (City of Chula Vista 2007).

5.3.3 OWD Forecasts

Estimated future capacity needs within the planning area were also calculated by utilizing the OWD's known water consumption data from water meters. This data was applied to land use predictions from SANDAG, the City of Chula Vista, and the County of San Diego to estimate future recycled water and sewer demand within undeveloped portions of the planning area.

5.3.4 Direct and Indirect Growth-Inducing Effects

Implementation of the 2012 WRMP Update would not directly create or induce growth within the planning area because the OWD has no land use authority and cannot approve land development. As stated in Section 5.3 above, indirect growth may result from the removal of physical impediments or restrictions to growth, as well as the removal of planning impediments resulting from land use plans and policies. In this context, physical growth impediments may include nonexistent or inadequate access to an area or the lack of essential public services (e.g., sewer service), while planning impediments may include restrictive zoning and/or general plan designations.

Many of the CIP projects under the 2012 WRMP Update would be constructed at sites that contain existing OWD facilities; therefore, these projects would not result in indirect growth effects. The construction of new CIP facilities within undeveloped areas would be phased commensurate with planned growth; therefore, these projects would also not result in indirect growth effects because the timing of implementation is intended to serve the recycled water and wastewater needs of specified planned developments as they are approved. In other words, none of the CIP projects under the 2012 WRMP Update would be developed in anticipation of unforeseen or unplanned future growth. Therefore, implementation of the 2012 WRMP Update would not be growth-inducing because it would not remove an impediment to growth.

Furthermore, construction of CIP projects under the 2012 WRMP Update would generate new jobs throughout the planning area, but this additional economic activity would be incremental compared to the

economic growth of the greater San Diego region. Therefore, implementation of the 2012 WRMP Update would not be growth-inducing because it would not foster substantial economic expansion or growth in the region.

5.4 Significant and Unavoidable Environmental Impacts

Section 15126.2(b) of the CEQA Guidelines requires the identification of significant impacts that would not be avoided, even with the implementation of PDFs, SCPs, and feasible mitigation/performance measures. The final determination of significance of impacts and of the feasibility of mitigation/performance measures will be made by the OWD Board of Directors as part of their certification of this SPEIR. Sections 4.1 through 4.10 of this SPEIR provide a programmatic evaluation of the potentially significant environmental effects and corresponding mitigation/performance measures associated with implementation of the 2012 WRMP Update. According to this evaluation, all potential environmental effects would be reduced to less than significant levels with implementation of identified PDFs, SCPs and feasible mitigation/performance measures, and no significant unavoidable environmental impacts would remain.

5.5 Significant Irreversible Environmental Effects

Section 15126.2(c) of the CEQA Guidelines requires a discussion of any significant irreversible environmental changes that would be caused by a proposed project, as follows:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible, since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

Generally, a project would result in significant irreversible environmental changes if:

- The primary and secondary impacts would generally commit future generations to similar uses;
- The project would involve a large commitment of nonrenewable resources;
- The project involves uses in which irreversible damage would result from any potential environmental accidents associated with the project; or
- The proposed consumption of resources is not justified (e.g., the project involves the wasteful use of energy).

Development and construction of wastewater infrastructure produces recycled water and under the 2012 WRMP Update would allow the OWD to continue to supply recycled water to its current and future users within the planning area. Resources that would be permanently and continually consumed by implementation of the 2012 WRMP Update include water, electricity, natural gas, and fossil fuels. However, the amount and rate of consumption of these resources would not result in significant environmental impacts or the unnecessary, inefficient, or wasteful use of resources for the reasons given in Section 5.2.5 above (refer to discussion of wastewater and the production of recycled water supply) and Section 4.4 (Energy) of this SPEIR. Nonetheless, construction and operations associated with implementation of the 2012 WRMP Update would result in the irretrievable commitment of nonrenewable energy resources. It is also possible that new technologies or systems would emerge, or

would become more cost-effective or user-friendly, upon which OWD may rely to further reduce their reliance on nonrenewable energy resources. Overall, the consumption of natural resources associated with implementation of the 2012 WRMP Update is expected to increase at a lesser rate than the projected population increase within the planning area due to the variety of energy conservation measures that the OWD will continue to implement, expand and develop in their continual quest to achieve energy efficiency for their construction and operational activities (refer to Section 4.4, Energy, of this SPEIR).

The CEQA Guidelines also require a discussion of the potential for irreversible environmental damage caused by an accident. As discussed in Section 4.10 (Public Safety) of this SPEIR, the OWD uses, transports, stores, and disposes of hazardous materials in accordance with applicable federal, State and local regulations, as well as with existing OWD programs, practices, and procedures related to hazardous materials, to reduce the likelihood and severity of accidents that would result in irreversible environmental damage. Therefore, implementation of Haz-PDF-1 would reduce hazards to the public or the environment through the transport, storage, use, or disposal of hazardous materials during CIP operations, and associated accidental releases of hazardous materials into the environment and near schools, to a less than significant level.

CHAPTER 6.0
PROJECT ALTERNATIVES

The California Environmental Quality Act (CEQA) requires an EIR to describe and evaluate a range of reasonable alternatives to a proposed project, or alternatives to the location of a proposed project. The purpose of the alternatives analysis is to explore ways that most of the basic objectives of a proposed project could be attained, while reducing or avoiding significant environmental impacts of the project as proposed. This approach is intended to foster informed decision-making and public participation in the environmental process.

This chapter evaluates alternatives to the 2012 WRMP Update and examines the potential environmental impacts associated with each alternative. The State CEQA Guidelines indicate that EIRs are required to evaluate a "…range of reasonable alternatives to the project, or to the location of the project, which could feasibly attain the basic objectives of the project" (Section 15126.6[a] State CEQA Guidelines). According to the Guidelines, not every conceivable alternative must be addressed, nor do infeasible alternatives need be considered. Section 15126.6 of the CEQA Guidelines lists the factors that may be taken into account when addressing the feasibility of alternatives: site suitability, economic viability, availability of infrastructure, other plans or regulatory limitations, and jurisdictional boundaries. The Guidelines also state that the discussion of alternatives should focus on "…alternatives capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives could impede to some degree the attainment of the project objectives or would be more costly" (Section 15166.6[b] State CEQA Guidelines). CEQA further directs that "…the significant effects of the alternatives shall be discussed, but in less detail than the significant effects of the project as proposed" (Section 15126.6[d] State CEQA Guidelines).

6.1 Project Objectives

As stated in Section 3.4.2 (Goals and Objectives, Project Description) of this SPEIR, the goals and objectives of the 2012 WRMP Update include the following actions:

- **Update Planning Criteria**: Update the OWD Land Use Database to incorporate recent and future population projections and planned development projects. Review system performance criteria based upon planning criteria, and make recommendations for revised or new criteria, as required. Evaluate compliance of existing potable and recycled water distribution systems with established planning criteria.
- **Update Hydraulic Model:** Convert the 2002 hydraulic models into a new modeling program that incorporates OWD's Geographic Information Systems capabilities. Calibrate the hydraulic models to observed actual conditions utilizing data derived from the SCADA (Supervisory Control and Data Acquisition) system.
- **Evaluate Existing Waste Water Management Systems**: Make recommendations for improvements to correct deficiencies of existing systems, and to meet demands of the future planning area and identified area of influence based upon development patterns, types, location and timing.
- **Evaluate Future Wastewater Management Systems**: Conduct additional hydraulic modeling for each pressure zone and system to analyze distribution system facilities under 6-year

(2009-2015) and ultimate (2016-2030) demand conditions. Recommend future CIP projects to serve these conditions.

- **Update CIP:** Develop a phased implementation plan for recommended CIP projects, and estimated costs for identified projects. Incorporate water resource strategies, short-term implementation strategies, and infrastructure needs for the long-term strategies identified in OWD's IWRP.

6.2 Otay Water District Wastewater Management Plan

Currently the District receives approximately 1.36 MGD of wastewater from the Jamacha Basin and treats approximately 1.3 MGD at the Ralph W. Chapman Water Recycling Facility (RWCWRF). Any excess flows beyond the RWCWRF's capacity are diverted through the Rancho San Diego Outfall Facilities to the City of San Diego Metropolitan Wastewater System at primary treated levels for further treatment at the South Bay Water Reclamation Plant (SBWRP).

6.3 Alternatives Analyzed

This section presents an evaluation of four alternatives to the proposed 2012 WRMP Update: No Project Alternative (Alternative 1), Eliminate Wastewater Treatment Within District (Alternative 2), Recycle All Wastewater Flows Within District (Alternative 3), and Recycle All Wastewater Flows Within District And Expanding To Accept Wastewater From Other Service Areas (Alternative 4). For all four alternatives, a brief description is included, followed by a summary impact analysis relative to the 2012 WRMP Update, and an assessment of the degree to which the alternative would meet the goals and objectives of the 2012 WRMP Update.

6.3.1 No Project Alternative

Section 15126.6(e) of the CEQA Guidelines requires the No Project Alternative to be addressed in an EIR. Under this alternative, the OWD Board of Directors would not adopt the 2012 WRMP Update.

Impact Analysis

Alternative 1 would not necessarily prevent the implementation of the CIP projects listed in the 2012 WRMP Update. Without the 2012 WRMP Update, these projects could still be constructed on an individual basis. The potential environmental impacts associated with implementation of the CIP projects identified in this SPEIR would still occur. These impacts would be reduced to less than significant levels with implementation of the various PDFs, SCPs, and mitigation/performance measures identified in this SPEIR.

Ability to Accomplish Project Objectives

Alternative 1 would not meet any of the objectives identified for the 2012 WRMP Update. Under this alternative, OWD would not be able to fulfill State, regional, and local polices which mandate the development of alternative water sources. This would hinder OWD's ability to meet the future wastewater demands of the planning area. In addition, this alternative would deny OWD the opportunity to streamline the environmental review of future projects with this SPEIR and subsequent tiered CEQA documents.

6.3.2 Eliminate Wastewater Treatment Within District

Alternative 2 would eliminate the capacity for OWD to treat wastewater, passing all wastewater to

neighboring communities.

Under Alternative 2, the District would abandon the current wastewater treatment operations at the RWCWRF and all wastewater flows collected by the District would be conveyed to the City of SD Metropolitan Wastewater System for treatment at the SBWRP. Other components associated with this alternative include, decommissioning the RWCWRF; implementing the required Rancho San Diego PS improvements; maintaining and improving the wastewater collection system based on hydraulic modeling.

Treatment options for wastewater flows being conveyed to the City of SD Metropolitan Wastewater System could be to either maintain current primary treatment or implement secondary treatment. Recycled water supply options under this alternative include receiving reclaimed water from the SBWRP and/or the proposed City of Chula Vista reclamation facility.

Impact Analysis

Alternative 2 may result in incrementally reduced impacts to biological resources, in comparison to the proposed CIP projects. However, biological impacts in undeveloped areas could still occur due to the decommissioning and demolition activities associated with the action. Temporary impacts to air quality may incrementally decrease with this alternative, as it may take less time to demolish facilities. Impacts to cultural resources may also be reduced. In general, Alternative 2 may result in less environmental impacts in comparison to the proposed CIP projects, but increases cumulative impacts in surrounding communities.

Ability to Accomplish Project Objectives

Alterative 2 would not meet the objectives identified for the 2012 WRMP Update. The CIP projects listed in the 2012 WRMP Update are designed to meet the wastewater management demands of the planning area and identified area of influence based upon development patterns, types, location and timing. This could result in increased impacts to air quality, cultural resources, energy consumption, landform alteration, water quality, and noise.

6.3.3 Recycle All Wastewater Flows Within District

Alternative 3 would continue collecting and treating wastewater at the RWCWRF under the current capacity of 1.3 MGD or operations could potentially be expanded to approximately 2.6 MGD. Excess flows beyond the RWCWRF's capacity would be conveyed to the City of SD Metropolitan Wastewater System for treatment at the SBWRP. Other components associated with this alternative include implementing the required Rancho San Diego PS improvements and maintaining and improving the wastewater collection system based on hydraulic modeling.

Options for solid waste disposal would include continuing current practices of conveyance to the Metropolitan Wastewater System or handling/treating solid waste onsite and disposing residuals in landfill. Treatment options for wastewater flows being conveyed to the City of SD Metropolitan Wastewater System could be to either maintain current primary treatment or implement secondary treatment. Recycled water supply options under this alternative include receiving reclaimed water from the RWCWRF, the SBWRP and/or the proposed City of Chula Vista reclamation facility.

Impact Analysis

Alternative 3 may result in no reduced impacts to any environmental resource in comparison to the proposed CIP projects. In general, Alternative 3 may result in more environmental impacts in comparison to the proposed CIP projects, but decreases cumulative impacts in surrounding communities.

Ability to Accomplish Project Objectives

Alterative 3 would meet some of the objectives identified for the 2012 WRMP Update. Under this alternative, OWD would be able to fulfill State, regional, and local polices which mandate the development of alternative water sources. This would enhance OWD's ability to meet the future wastewater demands of the planning area. The CIP projects listed in the 2012 WRMP Update are designed to meet the wastewater management demands of the planning area and identified area of influence based upon development patterns, types, location and timing..

6.3.4 Recycle All Wastewater Flows Within District and Expanding To Accept Wastewater From Other Service Areas

Alternative 4 would continue collecting and treating wastewater at the RWCWRF under an increased capacity of up to approximately 3.9 MGD. Under this scenario, the District would be able to treat all wastewater from the Jamacha Basin and any other service areas that needed wastewater treatment. Excess flows beyond the RWCWRF's capacity (if any) would be conveyed to the City of SD Metropolitan Wastewater System for treatment at the SBWRP. Other components associated with this alternative include implementing the required Rancho San Diego PS improvements and maintaining and improving the wastewater collection system based on hydraulic modeling.

Options for solid waste disposal would include continuing current practices of conveyance to the Metropolitan Wastewater System or handling/treating solid waste onsite and disposing residuals in landfill. Treatment options for wastewater flows being conveyed to the City of SD Metropolitan Wastewater System could be to either maintain current primary treatment or implement secondary treatment. Recycled water supply options under this alternative include receiving reclaimed water from the RWCWRF, the SBWRP and/or the proposed City of Chula Vista reclamation facility.

Impact Analysis

Alternative 4 may result in no reduced impacts to any environmental resource in comparison to the proposed CIP projects. In general, Alternative 4 may result in more environmental impacts in comparison to the proposed CIP projects, but decreases cumulative impacts in surrounding communities.

Ability to Accomplish Project Objectives

Alterative 4 would meet some of the objectives identified for the 2012 WRMP Update. Under this alternative, OWD would be able to fulfill State, regional, and local polices which mandate the development of alternative water sources. This would enhance OWD's ability to meet the future wastewater demands of the planning area. The CIP projects listed in the 2012 WRMP Update are designed to meet the wastewater management demands of the planning area and identified area of influence based upon development patterns, types, location and timing.

Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e) (2) requires that an EIR identify the environmentally superior alternative from among the range of reasonable alternatives that are evaluated. Alternative 1 (No Project Alternative) would avoid all potentially significant environmental impacts identified for the 2012 WRMP Update. However, Alternative 1 would not preclude implementation of some, if not all, of the CIP projects on an individual basis. In addition, this alternative would not meet any of the objectives of the 2012 WRMP Update.

CEQA Guidelines Section 15126.6(e) (2) also requires that an EIR identify another alternative as environmentally superior, besides Alternative 1 (No Project Alternative). In this case, the next

environmentally superior alternative would be Alternative 2 (Eliminate Wastewater Treatment Within District), which would reduce, but not eliminate, potential impacts to air quality, biological, and cultural resources. As this is a long range planning document a preferred alternative will not be determined in this document.

CHAPTER 7.0
ACRONYMS AND ABBREVIATIONS

ACOE	U.S. Army Corps of Engineers
AMSL	above mean sea level
BLM	Bureau of Land Management
BMPs	Best Management Practices
Caltrans	California Department of Transportation
CAPCOA	California Climate Action Team
CBC	California Building Code
CCC	California Coastal Commission
CDFG	California Department of Fish and Game
CDFW	California Department of Fish and Wildlife
CDMG	California Department of Conservation, Division of Mines and Geology
CDTSC	California Department of Toxic Substances Control
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CIP	Capital Improvement Program
CO_2	Carbon Dioxide
CWA	Clean Water Act
DEH	County of San Diego Department of Environmental Health
EIR	Environmental Impact Report
ESA	Endangered Species Act
Fed/OSHA	Federal/Occupational Safety and Health Administration
FHA	Federal Highway Administration
ft	feet
FY	Fiscal Year
GDP	General Development Plan
GHG	Greenhouse gases
GPM	gallons per minute
HCP	Habitat Conservation Plan
HMBP	Hazardous Materials Business Plan

I-805	Interstate 805
IWRP	Integrated Water Resources Plan
LF	linear feet
MGD	millions of gallons per day
MRZ	Minerals Resources Zone
NAHC	Native American Heritage Commission
NCCP	Natural Communities Conservation Plan
NHPA	National Historic Preservation Society
NRHP	National Register of Historic Places
NOP	Notice of Preparation
OWD	Otay Water District
PDFs	Project Design Features
PEIR	Program Environmental Impact Report
PS	Pump Station
RCP	Regional Comprehensive Plan
RWCWRF	Ralph W. Chapman Water Recycling Facility
RWQCB	Regional Water Quality Control Board
SAMPs	Sub Area Master Plans
SANDAG	San Diego Association of Governments
SBWRP	South Bay Water Reclamation Plant
SCADA	Supervisory Control and Data Acquisition
SCPs	Standard Construction Practices
SD	San Diego
SDAPCD	San Diego Air Pollution Control District
SDCWA	San Diego County Water Authority
SIP	State Implementation Plan
SPAs	Specific/Sectional Planning Areas
SPEIR	Supplemental Program Environmental Impact Report
SR-94	State Route 94
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
UBC	Uniform Building Code
U.S.	United States
USDOT	United States Department of Transportation
USEPA	U.S. Environmental Protection Agency

USFWS	U.S. Fish and Wildlife Service
WRMP	Water Resources Master Plan
WTP	Water Treatment Plan
WWMP	Waste Water Management Plan

CHAPTER 8.0 **LIST OF PREPARERS**

The following professional staff participated in the preparation of this SPEIR.

OTAY WATER DISTRICT (OWD)

Lisa Coburn-Boyd	Environmental Compliance Specialist

ARCADIS

Tim Francis	Project Manager
Edward Basmadjian	Senior Environmental Scientist
Holly Makowski	Graphics

CHAPTER 9.0 **LIST OF RECIPIENTS**

California Department of Parks and Recreation

California Department of Water Resources

California Department of Fish and Wildlife (CDFW), Region 5

California Department of Public Health

Native American Heritage Commission (NAHC)

California Department of Transportation (Caltrans), District 11

California Department of Toxic Substances Control (CDTSC)

Regional Water Quality Control Board (RWQCB), Region 9

California Resources Agency

State Water Resources Control Board (SWRCB), Division of Financial Assistance

Valle de Oro Community Planning Group

San Diego Main Public Library

County Public Library, Rancho San Diego Branch

County Public Library, La Mesa Branch

Chula Vista Public Library, Civic Center Branch

APPENDIX A

NOTICE OF PREPARATION (NOP) AND RESPONSES

Please refer to the following attached pages:

NOTICE OF PREPARATION
PUBLIC SCOPING MEETING NOTICE

OTAY WATER DISTRICT WASTEWATER MANAGEMENT PLAN
SUPPLEMENTAL PROGRAM ENVIRONMENTAL IMPACT REPORT (SPEIR) TO THE
OTAY WATER DISTRICT 2009 WATER RESOURCES MASTER PLAN UPDATE
2010 FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT (PEIR)

DATE: July 16th, 2012

TO: Responsible, Trustee, and Other Jurisdictional Agencies and Other Interested Organizations/Individuals

LEAD AGENCY: Otay Water District
2554 Sweetwater Springs Boulevard
Spring Valley, CA 91978-2004

In accordance with the California Environmental Quality Act (CEQA) and State CEQA Guidelines (CCR Title 14, §§15082(a), 15103, and 15375), this Notice of Preparation (NOP) is hereby sent to inform you that the Otay Water District (OWD) is preparing a Draft Supplemental Program EIR (SPEIR) to assess the environmental effects associated with implementation of the Wastewater Management Plan (WWMP). A Draft Supplemental Program EIR is being prepared pursuant to CEQA Guidelines §15163, to supplement the 2010 Final Program EIR for the OWD 2009 Water Resources Master Plan Update (WRMP) because the WWMP contains many features and issues of wastewater/recycled water that have been previously addressed and analyzed within the 2009 WRMP. This document would also be prepared (pursuant to CEQA Guidelines §15168) as a Program EIR because the WWMP is a policy, not development project, document that describes several wastewater alternatives for a long-term systematic approach to meet future wastewater needs through the Year 2030. The WWMP is intended to complement approved land use development plans and growth projects within the OWD service area and adjacent areas of influence, consistent with the San Diego Association of Government forecasts. The WWMP would include projects with new construction and/or demolition associated with expanding or reducing wastewater facilities, dependent upon which alternative is chosen as the Preferred Alternative. The SPEIR would provide the basis for subsequent environmental review of future wastewater projects.

As Lead Agency under CEQA, we need to know the views of your agency as to the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with implementation of the WWMP. Your agency may need to use the SPEIR prepared by the OWD when considering your permit or other approvals. The OWD requests that any potential responsible or trustee agency respond to this NOP in a manner consistent with State CEQA Guidelines Section 15082(b). If you are responding as an interested organization or individual citizen, we need to know your views as to the environmental information you would like us to address in the Draft SPEIR.

Attachment 1 provides an overview of the WWMP alternatives and its objectives, and a map of the WWMP planning area and adjacent areas of influence, including sewer service locations is provided in Attachment 2.

Public Scoping Meeting: A public scoping meeting would be held to provide more information on the WWMP, and to give the public an opportunity to offer comments and suggestions on the scope of the Draft SPEIR. The public scoping meeting would provide the OWD with an opportunity to learn about potential concerns, mitigation measures, and alternatives that may warrant in-depth analysis in the environmental review process. The date, time, and address of this meeting are provided below:

Date: August 2nd, 2012
Time: Between 4:00 PM and 6:00 PM
Place: Otay Water District
Training Room
2554 Sweetwater Springs Boulevard
Spring Valley, CA 91978-2004

Due to the time limits mandated by State Law, your response must be sent at the earliest possible date, but **not later than 30 days after receipt of this NOP**. Please send your written responses, including the name of a contact person and phone number, to:

Lisa Coburn-Boyd
Otay Water District
2554 Sweetwater Springs Boulevard
Spring Valley, CA 91978-2004
Phone: 619-670-2219
Fax: 619-670-8920
E-mail: lisa.coburn-boyd@otaywater.gov

Any written or oral comments received at the public scoping meeting would be considered in preparing the Draft SPEIR, along with any written comments received during the 30-day NOP public comment period. All parties that have submitted their names and mailing addresses would be notified of subsequent actions as part of the environmental review process. If you wish to be placed on the mailing list or have any questions about the WWMP, please contact Ms. Lisa Coburn-Boyd at the phone number above.

Signature: Lisa Coburn-Boyd
OTAY WATER DISTRICT
Name: Lisa Coburn-Boyd
Title: Environmental Compliance Specialist
Date: July 16th, 2012

Attachments: Overview of WWMP alternatives
Map of WWMP project area and adjacent areas of influence, including sewer service locations.

Attachment 1

Overview

The purpose of the Otay Water District (OWD) Wastewater Management Plan (WWMP) is to supplement the 2009 Water Resources Management Plan Update (WRMP), identify and evaluate current wastewater facilities (e.g., wastewater pumping stations and treatment plants), design feasible wastewater management strategies that allow the OWD to meet projected future wastewater needs within the OWD planning area and adjacent areas of influence, and to develop a phased and systematic approach to implement the wastewater management strategies during future time frames. The OWD WWMP would ensure a wastewater system adequate for projected growth within the OWD planning area and adjacent areas of influence, consistent with the San Diego Association of Governments (SANDAG) forecasts through 2030.

The WWMP currently consists of several wastewater alternatives with differing project features and components. These alternatives give the OWD the most flexibility in choosing the best alternative that fulfills their wastewater strategies and meets projected future demand.

- Alternative 1 – Eliminate Wastewater Treatment Within District

  Under this alternative, the District would abandon the current wastewater treatment operations at the Ralph W. Chapman Water Recycling Facility (RWCWRF) and all wastewater flows collected by the District would be conveyed to the City of San Diego (SD) Metropolitan Wastewater System for treatment at the South Bay Water Reclamation Plant (SBWRP). Other components associated with this alternative include, decommissioning the RWCWRF; implementing the required Rancho San Diego Pump Station (PS) improvements; maintaining and improving the wastewater collection system based on hydraulic modeling.

  Treatment options for wastewater flows being conveyed to the City of SD Metropolitan Wastewater System could be to either maintain current primary treatment or implement secondary treatment. Recycled water supply options under this alternative include receiving reclaimed water from the SBWRP and/or the planned City of Chula Vista reclamation facility.

- Alternative 2 – Recycle All Wastewater Flows Within District

  Under this alternative, the District would continue collecting and treating wastewater at the RWCWRF under the current capacity of 1.3 mgd or operations could potentially be expanded to approximately 2.6 mgd. Excess flows beyond the RWCWRF's capacity would be conveyed to the City of SD Metropolitan Wastewater System for treatment at the SBWRP. Other components associated with this alternative include implementing the required Rancho San Diego PS improvements and maintaining and improving the wastewater collection system based on hydraulic modeling.

Options for solid waste disposal would include continuing current practices of conveyance to the Metropolitan Wastewater System or handling/treating solid waste onsite and disposing residuals in landfill. Treatment options for wastewater flows being conveyed to the City of SD Metropolitan Wastewater System could be to either maintain current primary treatment or implement secondary treatment. Recycled water supply options under this alternative include receiving reclaimed water from the RWCWRF, the SBWRP and/or the planned City of Chula Vista reclamation facility.

- Alternative 3 – Recycle All Wastewater Flows Within District and Expand To Accept Wastewater From Other Service Areas

  Under this alternative, the District would continue collecting and treating wastewater at the RWCWRF under an increased capacity of up to approximately 3.9 mgd. Under this scenario, the District would be able to treat all wastewater from the Jamacha Basin and any other service areas that needed wastewater treatment. Excess flows beyond the RWCWRF's capacity (if any) would be conveyed to the City of SD Metropolitan Wastewater System for treatment at the SBWRP. Other components associated with this alternative include implementing the required Rancho San Diego PS improvements and maintaining and improving the wastewater collection system based on hydraulic modeling.

  Options for solid waste disposal would include continuing current practices of conveyance to the Metropolitan Wastewater System or handling/treating solid waste onsite and disposing residuals in landfill. Treatment options for wastewater flows being conveyed to the City of SD Metropolitan Wastewater System could be to either maintain current primary treatment or implement secondary treatment. Recycled water supply options under this alternative include receiving reclaimed water from the RWCWRF, the SBWRP and/or the planned City of Chula Vista reclamation facility.

The process to finalize the WWMP requires addressing environmental impacts for each wastewater alternative. Pursuant to State CEQA Guidelines, OWD must prepare a SPEIR to obtain approval and formal adoption of the WWMP. The SPEIR would provide an overview of the wastewater alternatives identified in the WWMP, and their impacts in terms of visual aesthetics/landform alteration, air quality/global climate change, biological resources, cultural resources, energy, geology/soils/paleontological resources, hydrology/water quality, land use/planning, noise, cumulative effects, and growth inducement. The PEIR for the 2009 WRMP was completed in January 2010.

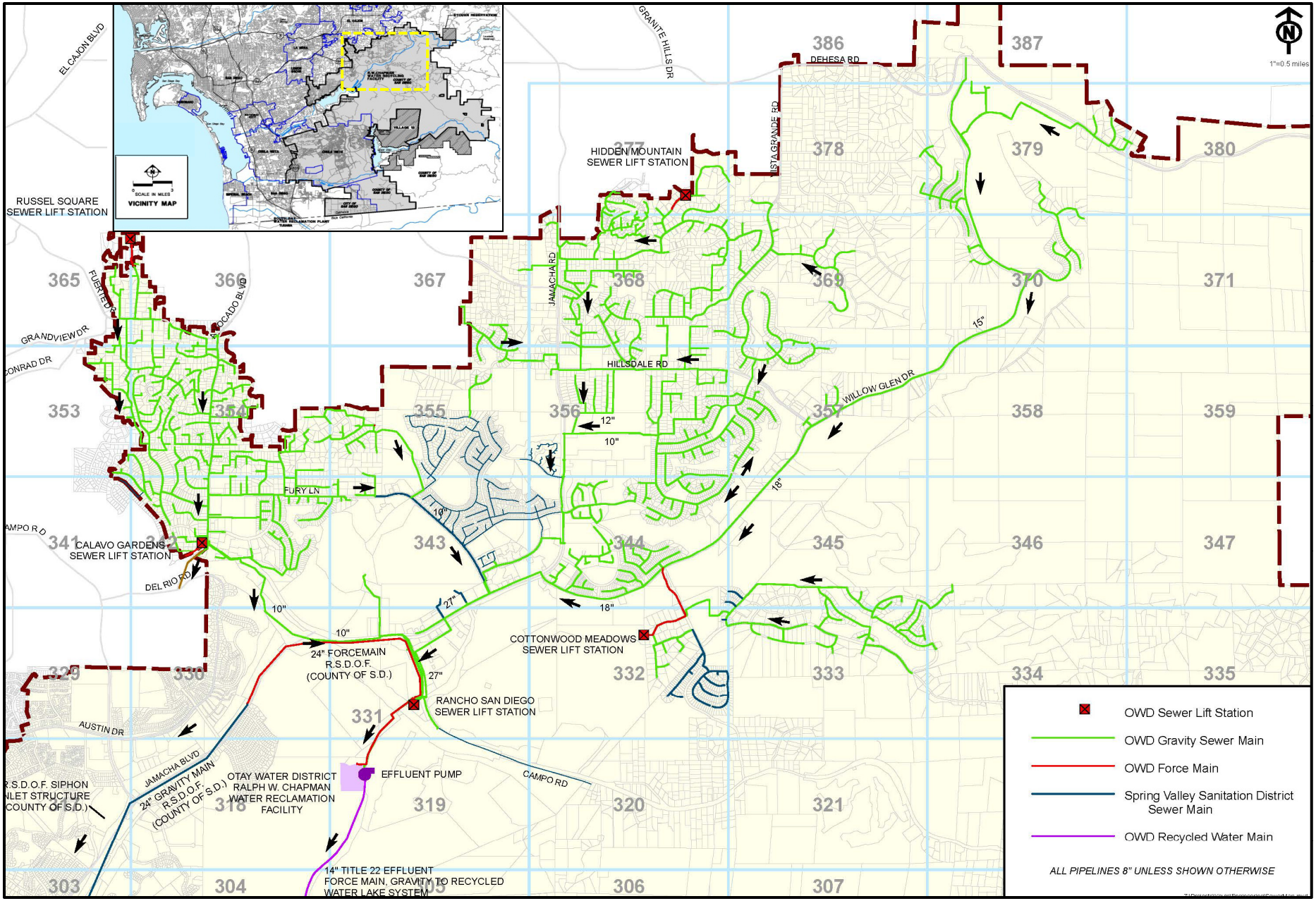
Goals & Objectives

The WWMP will identify a comprehensive system-wide plan for a wastewater system within the OWD planning area and the identified area of influence. The OWD's primary objectives for the WWMP include the following actions:

- **Update Planning Criteria:** Update the land use database model from the 2010 WRMP using San Diego County land use updates and 2010 SANDAG land use projections. Project the wastewater flows within the District's service area and adjacent areas of influence using population (residential and employment) projections and per capita generation factors.
- **Update Hydraulic Model:** Update the OWD 2006 hydraulic model using data from the County's updated hydraulic model for the Jamacha Basin.
- **Evaluate Existing Wastewater Systems:** Make recommendations for improvements to correct deficiencies of existing systems, and to meet any demands of the planning area and identified area of influence based upon development patterns, types, location and timing.
- **Evaluate Future Wastewater Systems:** Using the projected wastewater collection rates for the planning area, determine new wastewater collection system facilities needs to build out and develop a list of capital improvement program projects to meet these needs. Develop strategies for treatment of the collected wastewater flows and their corresponding CIP needs.
- **Update CIP:** Develop a phased implementation plan for recommended CIP projects for the existing system deficiencies and any new facilities and estimate costs for identified projects.

Attachment 2

Map of WWMP project area and adjacent areas of influence, including sewer service locations.



Otay Water District Wastewater Service Area

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT

EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

Notice of Preparation

July 20, 2012

To: Reviewing Agencies

Re: Otay Water District Wastewater Management Plan Update
SCH# 2012071069

Attached for your review and comment is the Notice of Preparation (NOP) for the Otay Water District Wastewater Management Plan Update draft Environmental Impact Report (EIR).

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

Please direct your comments to:

Lisa Coburn-Boyd
Otay Water District
2554 Sweetwater Springs Boulevard
Spring Valley, CA 91978-2004

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

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

Sincerely,

Scott Morgan
Director, State Clearinghouse

Attachments
cc: Lead Agency

Document Details Report
State Clearinghouse Data Base

SCH# 2012071069
Project Title Otay Water District Wastewater Management Plan Update
Lead Agency Otay Water District

Type NOP Notice of Preparation

Description The purpose of the Otay Water District (OWD) Wastewater Management Plan (WWMP) is to supplement the 2009 Water Resources Management Plan Update (WRMP), identify and evaluate current wastewater facilities, design feasible wastewater management strategies that allow the OWD to meet projected future wastewater needs within the OWD planning area and adjacent areas of influence, and to develop a phased and systematic approach to implement the wastewater management strategies during future time frames. The OWD WWMP would ensure a wastewater system adequate for projected growth within the OWD planning area and adjacent areas of influence, consistent with the San Diego Association of Governments (SANDAG) forecasts through 2030.

Lead Agency Contact

Name Lisa Coburn-Boyd
Agency Otay Water District
Phone (619) 670-2219 **Fax**
email
Address 2554 Sweetwater Springs Boulevard
City Spring Valley **State** CA **Zip** 91978-2004

Project Location

County San Diego
City
Region
Cross Streets Northern Portion of Otay Water District
Lat / Long
Parcel No.
Township **Range** **Section** **Base**

Proximity to:

Highways Hwy 94, 125
Airports No
Railways No
Waterways Sweetwater River and Reservoir
Schools Loma Es, Monte Vista...
Land Use Varies

Project Issues Aesthetic/Visual; Air Quality; Archaeologic-Historic; Biological Resources; Sewer Capacity; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply; Growth Inducing; Cumulative Effects

Reviewing Agencies Department of Parks and Recreation; Department of Water Resources; Department of Fish and Game, Region 5; CA Department of Public Health; Native American Heritage Commission; Caltrans, District 11; Department of Toxic Substances Control; Regional Water Quality Control Board, Region 9; Resources Agency; State Water Resources Control Board, Divison of Financial Assistance

Date Received 07/19/2012 **Start of Review** 07/20/2012 **End of Review** 08/20/2012

Note: Blanks in data fields result from insufficient information provided by lead agency.

NOP Distribution List

County: San Diego SCH# 2012071069

Resources Agency

- [x] Resources Agency
  Nadell Gayou
- [ ] Dept. of Boating & Waterways
  Nicole Wong
- [ ] California Coastal Commission
  Elizabeth A. Fuchs
- [ ] Colorado River Board
  Gerald R. Zimmerman
- [ ] Dept. of Conservation
  Elizabeth Carpenter
- [ ] California Energy Commission
  Eric Knight
- [ ] Cal Fire
  Dan Foster
- [ ] Central Valley Flood Protection Board
  James Herota
- [ ] Office of Historic Preservation
  Ron Parsons
- [x] Dept of Parks & Recreation
  Environmental Stewardship Section
- [ ] California Department of Resources, Recycling & Recovery
  Sue O'Leary
- [ ] S.F. Bay Conservation & Dev't. Comm.
  Steve McAdam
- [x] Dept. of Water Resources Resources Agency
  Nadell Gayou

Fish and Game

- [ ] Depart. of Fish & Game
  Scott Flint
  Environmental Services Division
- [ ] Fish & Game Region 1
  Donald Koch
- [ ] Fish & Game Region 1E
  Laurie Harnsberger
- [ ] Fish & Game Region 2
  Jeff Drongesen
- [ ] Fish & Game Region 3
  Charles Armor
- [ ] Fish & Game Region 4
  Julie Vance
- [x] Fish & Game Region 5
  Leslie Newton-Reed
  Habitat Conservation Program
- [ ] Fish & Game Region 6
  Gabrina Gatchel
  Habitat Conservation Program
- [ ] Fish & Game Region 6 I/M
  Brad Henderson
  Inyo/Mono, Habitat Conservation Program
- [ ] Dept. of Fish & Game M
  George Isaac
  Marine Region

Other Departments

- [ ] Food & Agriculture
  Sandra Schubert
  Dept. of Food and Agriculture
- [ ] Depart. of General Services
  Public School Construction
- [ ] Dept. of General Services
  Anna Garbeff
  Environmental Services Section
- [x] Dept. of Public Health
  Bridgette Binning
  Dept. of Health/Drinking Water
- [ ] Delta Stewardship Council
  Kevan Samsam

Independent Commissions,Boards

- [ ] Delta Protection Commission
  Michael Machado
- [ ] Cal EMA (Emergency Management Agency)
  Dennis Castrillo
- [x] Native American Heritage Comm.
  Debbie Treadway
- [ ] Public Utilities Commission
  Leo Wong
- [ ] Santa Monica Bay Restoration
  Guangyu Wang
- [ ] State Lands Commission
  Jennifer Deleong
- [ ] Tahoe Regional Planning Agency (TRPA)
  Cherry Jacques

Business, Trans & Housing

- [ ] Caltrans - Division of Aeronautics
  Philip Crimmins
- [ ] Caltrans - Planning
  Terri Pencovic
- [ ] California Highway Patrol
  Suzann Ikeuchi
  Office of Special Projects
- [ ] Housing & Community Development
  CEQA Coordinator
  Housing Policy Division

Dept. of Transportation

- [ ] Caltrans, District 1
  Rex Jackman
- [ ] Caltrans, District 2
  Marcelino Gonzalez
- [ ] Caltrans, District 3
  Gary Arnold
- [ ] Caltrans, District 4
  Erik Alm
- [ ] Caltrans, District 5
  David Murray
- [ ] Caltrans, District 6
  Michael Navarro
- [ ] Caltrans, District 7
  Dianna Watson
- [ ] Caltrans, District 8
  Dan Kopulsky
- [ ] Caltrans, District 9
  Gayle Rosander
- [ ] Caltrans, District 10
  Tom Dumas
- [x] Caltrans, District 11
  Jacob Armstrong
- [ ] Caltrans, District 12
  Marlon Regisford

Cal EPA

Air Resources Board

- [ ] Airport/Energy Projects
  Jim Lerner
- [ ] Transportation Projects
  Douglas Ito
- [ ] Industrial Projects
  Mike Tollstrup
- [x] State Water Resources Control Board
  Regional Programs Unit
  Division of Financial Assistance
- [ ] State Water Resources Control Board
  Student Intern, 401 Water Quality Certification Unit
  Division of Water Quality
- [ ] State Water Resouces Control Board
  Phil Crader
  Division of Water Rights
- [x] Dept. of Toxic Substances Control
  CEQA Tracking Center
- [ ] Department of Pesticide Regulation
  CEQA Coordinator

Regional Water Quality Control Board (RWQCB)

- [ ] RWQCB 1
  Cathleen Hudson
  North Coast Region (1)
- [ ] RWQCB 2
  Environmental Document Coordinator
  San Francisco Bay Region (2)
- [ ] RWQCB 3
  Central Coast Region (3)
- [ ] RWQCB 4
  Teresa Rodgers
  Los Angeles Region (4)
- [ ] RWQCB 5S
  Central Valley Region (5)
- [ ] RWQCB 5F
  Central Valley Region (5)
  Fresno Branch Office
- [ ] RWQCB 5R
  Central Valley Region (5)
  Redding Branch Office
- [ ] RWQCB 6
  Lahontan Region (6)
- [ ] RWQCB 6V
  Lahontan Region (6)
  Victorville Branch Office
- [ ] RWQCB 7
  Colorado River Basin Region (7)
- [ ] RWQCB 8
  Santa Ana Region (8)
- [x] RWQCB 9
  San Diego Region (9)

- [ ] Other _____
- [ ] _____ Conservancy

Last Updated 6/26/2012

NATIVE AMERICAN HERITAGE COMMISSION
915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
Fax (916) 657-5390
Web Site www.nahc.ca.gov
ds_nahc@pacbell.net

July 24, 2012

Ms. Lisa Coburn-Boyd, Environmental Compliance Specialist
Otay Water District
2554 Sweetwater Springs Boulevard
Spring Valley, CA 91978-2004

Re: SCH#2012071069; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the **Otay Water District Wastewater Management Plan Update;** located in the northern portion of the Otay Water District; San Diego County, California.

Dear Ms. Coburn-Boyd:

The Native American Heritage Commission (NAHC), the State of California 'Trustee Agency' for the protection and preservation of Native American cultural resources pursuant to California Public Resources Code §21070 and affirmed by the Third Appellate Court in the case of EPIC v. Johnson (1985: 170 Cal App. 3rd 604).

This letter includes state and federal statutes relating to Native American historic properties of religious and cultural significance to American Indian tribes and interested Native American individuals as 'consulting parties' under both state and federal law. State law also addresses the freedom of Native American Religious Expression in Public Resources Code §5097.9

The California Environmental Quality Act (CEQA – CA Public Resources Code 21000-21177, amendments effective 3/18/2010) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per the CEQA Guidelines defines a significant impact on the environment as 'a substantial, or potentially substantial, adverse change in any of physical conditions within an area affected by the proposed project, including ...objects of historic or aesthetic significance." In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE), and if so, to mitigate that effect. The NAHC recommends that the lead agency request that the NAHC do a Sacred Lands File search as part of the careful planning for the proposed project.

The NAHC "Sacred Sites,' as defined by the Native American Heritage Commission and the California Legislature in California Public Resources Code §§5097.94(a) and 5097.96. Items in the NAHC Sacred Lands Inventory are confidential and exempt from the Public Records Act pursuant to California Government Code §6254 (r).

Early consultation with Native American tribes in your area is the best way to avoid unanticipated discoveries of cultural resources or burial sites once a project is underway. Culturally affiliated tribes and individuals may have knowledge of the religious and cultural significance of the historic properties in the project area (e.g. APE). We strongly urge that you

make contact with the list of Native American Contacts on the attached list of Native American contacts, to see if your proposed project might impact Native American cultural resources and to obtain their recommendations concerning the proposed project. Pursuant to CA Public Resources Code § 5097.95, the NAHC requests cooperation from other public agencies in order that the Native American consulting parties be provided pertinent project information. Consultation with Native American communities is also a matter of environmental justice as defined by California Government Code §65040.12(e). Pursuant to CA Public Resources Code §5097.95, the NAHC requests that pertinent project information be provided consulting tribal parties. The NAHC recommends *avoidance* as defined by CEQA Guidelines §15370(a) to pursuing a project that would damage or destroy Native American cultural resources and Section 2183.2 that requires documentation, data recovery of cultural resources.

Furthermore, the NAHC if the proposed project is under the jurisdiction of the statutes and regulations of the National Environmental Policy Act (e.g. NEPA; 42 U.S.C. 4321-43351). Consultation with tribes and interested Native American consulting parties, on the NAHC list, should be conducted in compliance with the requirements of federal NEPA and Section 106 and 4(f) of federal NHPA (16 U.S.C. 470 *et seq*), 36 CFR Part 800.3 (f) (2) & .5, the President's Council on Environmental Quality (CSQ, 42 U.S.C 4371 *et seq.* and NAGPRA (25 U.S.C. 3001-3013) as appropriate. The 1992 *Secretary of the Interiors Standards for the Treatment of Historic Properties* were revised so that they could be applied to all historic resource types included in the National Register of Historic Places and including cultural landscapes. Also, federal Executive Orders Nos. 11593 (preservation of cultural environment), 13175 (coordination & consultation) and 13007 (Sacred Sites) are helpful, supportive guides for Section 106 consultation. The aforementioned Secretary of the Interior's *Standards* include recommendations for all 'lead agencies' to consider the historic context of proposed projects and to "research" the cultural landscape that might include the 'area of potential effect.'

Confidentiality of "historic properties of religious and cultural significance" should also be considered as protected by California Government Code §6254(r) and may also be protected under Section 304 of he NHPA or at the Secretary of the Interior discretion if not eligible for listing on the National Register of Historic Places. The Secretary may also be advised by the federal Indian Religious Freedom Act (cf. 42 U.S.C., 1996) in issuing a decision on whether or not to disclose items of religious and/or cultural significance identified in or near the APEs and possibility threatened by proposed project activity.

Furthermore, Public Resources Code Section 5097.98, California Government Code §27491 and Health & Safety Code Section 7050.5 provide for provisions for inadvertent discovery of human remains mandate the processes to be followed in the event of a discovery of human remains in a project location other than a 'dedicated cemetery'.

To be effective, consultation on specific projects must be the result of an ongoing relationship between Native American tribes and lead agencies, project proponents and their contractors, in the opinion of the NAHC. Regarding tribal consultation, a relationship built around regular meetings and informal involvement with local tribes will lead to more qualitative consultation tribal input on specific projects.

Finally, when Native American cultural sites and/or Native American burial sites are prevalent within the project site, the NAHC recommends 'avoidance' of the site as referenced by CEQA Guidelines Section 15370(a).

If you have any questions about this response to your request, please do not hesitate to contact me at (916) 653-6251.

Sincerely,

Dave Singleton
Program Analyst

Cc: State Clearinghouse

Attachment: Native American Contact List

Native American Contact
San Diego County
July 24, 2012

Barona Group of the Capitan Grande
Edwin Romero, Chairperson
1095 Barona Road Diegueno
Lakeside , CA 92040
sue@barona-nsn.gov
(619) 443-6612
619-443-0681

Sycuan Band of the Kumeyaay Nation
Danny Tucker, Chairperson
5459 Sycuan Road Diegueno/Kumeyaay
El Cajon , CA 92019
ssilva@sycuan-nsn.gov
619 445-2613
619 445-1927 Fax

La Posta Band of Mission Indians
Gwendolyn Parada, Chairperson
PO Box 1120 Diegueno/Kumeyaay
Boulevard , CA 91905
gparada@lapostacasino.
(619) 478-2113
619-478-2125

Viejas Band of Kumeyaay Indians
Anthony R. Pico, Chairperson
PO Box 908 Diegueno/Kumeyaay
Alpine , CA 91903
jrothauff@viejas-nsn.gov
(619) 445-3810
(619) 445-5337 Fax

San Pasqual Band of Mission Indians
Allen E. Lawson, Chairperson
PO Box 365 Diegueno
Valley Center, CA 92082
allenl@sanpasqualband.com
(760) 749-3200
(760) 749-3876 Fax

Kumeyaay Cultural Historic Committee
Ron Christman
56 Viejas Grade Road Diegueno/Kumeyaay
Alpine , CA 92001
(619) 445-0385

Iipay Nation of Santa Ysabel
Virgil Perez, Spokesman
PO Box 130 Diegueno
Santa Ysabel, CA 92070
brandietaylor@yahoo.com
(760) 765-0845
(760) 765-0320 Fax

Campo Band of Mission Indians
Ralph Goff, Chairperson
36190 Church Road, Suite 1 Diegueno/Kumeyaay
Campo , CA 91906
chairgoff@aol.com
(619) 478-9046
(619) 478-5818 Fax

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

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

This list is applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#2012071069; CEQA Notice of Preparation (NOP); draft Environmental Impact Report (DEIR) for the Otay Water District Wastewater Managment Plan Update; located in the Spring Valley area; San Diego County, California.

CALIFORNIA
Water Boards

EDMUND G. BROWN JR.
GOVERNOR

MATTHEW RODRIQUEZ
SECRETARY FOR
ENVIRONMENTAL PROTECTION

State Water Resources Control Board

JUL 2 7 2012

Lisa Coburn-Boyd
Otay Water District
2554 Sweetwater Springs Boulevard
Spring Valley, CA 91978-2004

Dear Ms. Coburn-Boyd:

NOTICE OF PREPARATION (NOP); OTAY WATER DISTRICT (DISTRICT); OTAY WATER DISTRICT WASTEWATER MANAGEMENT PLAN UPDATE (PROJECT); SAN DIEGO COUNTY; STATE CLEARINGHOUSE NO. 2012071069

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

Please provide us with the following documents applicable to the proposed Project if seeking CWSRF or other State Water Board funding: (1) 1 copy of the draft and final EIR, (2) the resolution adopting the EIR and a Mitigation Monitoring and Reporting Program (MMRP) making California Environmental Quality Act (CEQA) findings, (3) all comments received during the review period and the District's response to those comments, (4) the adopted MMRP, and (5) the Notice of Determination filed with the San Diego Clerk and the Governor's Office of Planning and Research, State Clearinghouse. In addition, we would appreciate notices of any hearings or meetings held regarding environmental review of any projects to be funded by the State Water Board.

The CWSRF Program is partially funded by the United States Environmental Protection Agency and requires additional "CEQA-Plus" environmental documentation and review. Four enclosures are included that further explain the CWSRF Program environmental review process and the additional federal requirements. The State Water Board is required to consult directly with agencies responsible for implementing federal environmental laws and regulations. Any environmental issues raised by federal agencies or their representatives will need to be resolved prior to State Water Board approval of a CWSRF funding commitment for the proposed Project. For further information on the CWSRF Program, please contact Mr. Ahmad Kashkoli, at (916) 341-5855.

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

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

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

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

Other federal requirements pertinent to the Project under the CWSRF Program include the following:

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

B. Compliance with the Coastal Zone Management Act: identify whether the Project is within a coastal zone and the status of any coordination with the California Coastal Commission.

C. Protection of Wetlands: Identify any portion of the proposed Project area that should be evaluated for wetlands or United States waters delineation by the United States Army Corps of Engineers (USACE), or requires a permit from the USACE, and identify the status of coordination with the USACE.

D. Compliance with the Farmland Protection Policy Act: Identify whether the Project will result in the conversion of farmland. State the status of farmland (Prime, Unique, or Local Statewide Importance) in the Project area and determine if this area is under a Williamson Act Contract.

E. Compliance with the Migratory Bird Treaty Act: List any birds protected under this Act that may be impacted by the Project and identify conservation measures to minimize impacts.

F. Compliance with the Flood Plain Management Act: Identify whether or not the Project is in a Flood Management Zone and include a copy of the Federal Emergency Management Agency flood zone maps for the area.

G. Compliance with the Wild and Scenic Rivers Act: Identify whether or not any Wild and Scenic Rivers would be potentially impacted by the Project and include conservation measures to minimize such impacts.

Thank you for the opportunity to review the District's NOP. If you have any questions or concerns about the State Water Board CWSRF Program environmental review process or the information provided in this letter, please feel free to contact me at (916) 341-5855, or by email at akashkoli@waterboards.ca.gov, or contact Ms. Michelle Helms at (916) 341-5686, or by email at mhelms@waterboards.ca.gov.

Sincerely,

Ahmad Kashkoli
Environmental Scientist
Division of Financial Assistance

Enclosures (4)

1. SRF & CEQA-Plus
2. Quick Reference Guide to CEQA Requirements for State Revolving Fund Loans
3. Instructions and Guidance for "Environmental Compliance Information"
4. Basic Criteria for Cultural Resources Reports

cc: State Clearinghouse
(Re: SCH# 2012071069)
P. O. Box 3044
Sacramento, CA 95812-3044

CLEAN WATER STATE REVOLVING FUND PROGRAM
INSTRUCTIONS AND GUIDANCE FOR
"ENVIRONMENTAL COMPLIANCE INFORMATION"

Introduction:

The State Water Resources Control Board (State Water Board) uses the California Environmental Quality Act (CEQA) review process and compliance with federal environmental laws and regulations to satisfy the environmental requirements of the Clean Water State Revolving Fund (CWSRF) Program Operating Agreement between the United States Environmental Protection Agency (USEPA) and the State Water Board. The CWSRF Program is partially funded by a capitalization grant from the USEPA. The issuance of funds from the CWSRF Program is equivalent to a federal action, and thus, compliance with federal environmental laws and regulations is required for projects being funded under the CWSRF Program.

All CWSRF Program applicants must submit adequate and complete environmental documentation to the State Water Board. Following submittal of an applicant's environmental documents, the State Water Board will review the documents to determine if the information is sufficient to document compliance with the CWSRF Program environmental requirements, including making a determination if consultation with federal authorities is required, and may request additional environmental information, when needed. The State Water Board encourages all applicants to initiate early consultation, so that the State Water Board can better streamline the environmental review process.

CEQA Information:

All projects coming to the State Water Board for funding are considered "projects" under CEQA because of the State Water Board's discretionary decision to approve funding.

Detailed information, including CEQA statutes and guidelines can be found online at the California Natural Resources Agency website at http://ceres.ca.gov/ceqa. A CEQA Process Flowchart that shows interaction points between lead and responsible agencies can be found at http://ceres.ca.gov/topic/env_law/ceqa/flowchart/index.html. In addition, State Water Board environmental staff is available to answer questions about the CEQA process, as well as the CWSRF Program environmental requirements. Please contact your assigned Project Manager at the State Water Board, regarding contact information for the appropriate environmental staff.

CEQA requires full disclosure of all aspects of the project, including impacts and mitigation measures that are not only regulated by state agencies, but also by federal agencies. Early consultation with state and federal agencies in the CEQA process will assist in minimizing changes to the project when funding is being requested from the State Water Board.

The types of CEQA documents that may apply to an applicant's project include one or a combination of the following: 1) Notice of Exemption (NOE); 2) Initial Study and Negative Declaration (ND); 3) Initial Study and Mitigated Negative Declaration (MND) with a Mitigation Monitoring and Reporting Program (MMRP); 4) Environmental Impact Report (EIR) with an MMRP; and/or 5) Addendum, Supplemental and Subsequent ND, MND or EIR. The applicant must determine the appropriate document for its project and submit the supporting information listed under the applicable section of the Environmental Package Checklist for Applicant (Attachment 1), along with a completed copy of the Evaluation Form for Environmental Review and Federal Coordination (Attachment 2). Please submit two copies of all CEQA documents.

The applicant must ensure the CEQA document is specific to the project for which funding is being requested. Program or Master Plan EIRs may not be suitable for satisfying the State Water Board environmental requirements if these documents are not project-specific. When an applicant uses an Addendum, Supplemental or Subsequent CEQA document for a project, the associated Program or Master Plan EIR must also be submitted, especially if the Addendum, Supplemental or Subsequent CEQA document includes references to pertinent environmental and mitigation information contained in the Program or Master Plan EIR.

If the applicant is using a CEQA document that is older than five years, the applicant must re-evaluate environmental and project conditions, and develop and submit an updated environmental document (such as an Addendum, Supplemental or Subsequent CEQA document) based on the results of that re-evaluation. The updated environmental document must be circulated through the State Clearinghouse for public review. The applicant must adopt the final updated environmental document, including any new identified measures, make CEQA findings, and file a Notice of Determination (NOD) with the local county clerk(s) and the Governor's Office of Planning and Research, State Clearinghouse (State Clearinghouse).

Each applicant, if it is a public agency, is responsible for approving the CEQA documents it uses regardless of whether or not it is a lead agency under CEQA. Non-profit organizations shall only be responsible for approving and ensuring implementation of the applicable project mitigation measures identified in the MMRP. All public agencies applying for CWSRF Program funding shall file either an NOE or an NOD with the State Clearinghouse and the local county clerk(s). Date stamped copies of those notices must be submitted with all the applicable environmental documents.

If the CEQA document was jointly prepared by a federal public governmental agency to satisfy the National Environmental Policy Act (NEPA) requirements, then the applicant must submit the corresponding NEPA documents, including a Finding of No Significant Impact, or a Record of Decision completed by the federal NEPA lead agency.

Federal Information:

In addition to CEQA compliance, the State Water Board is required to document environmental compliance with federal environmental laws and regulations, including:

1. Federal Endangered Species Act (ESA), Section 7:

The United States Department of the Interior, Fish and Wildlife Service (USFWS) and the United States Department of Commerce National Oceanic and Atmospheric Administration, National Marine Fisheries Service (NMFS) must be consulted for any project that will have the potential to adversely impact a federal special-status species. The USEPA delegated the State Water Board to act as the non-federal lead for initiating informal Section 7 ESA consultation with the USFWS. The State Water Board will coordinate with the USEPA for projects requiring formal Section 7 ESA consultation with the USFWS and projects that will impact federal special-status fish species under the NMFS jurisdiction. The USFWS and NMFS must provide written concurrence prior to a CWSRF financing agreement. USFWS and NMFS comments may include conservation measures, for which the applicant's CWSRF financing agreement will be conditioned to ensure compliance.

For further information on the federal ESA law, regulation, policy, and notices, go to http://www.fws.gov/endangered/laws-policies/index.html and http://www.nmfs.noaa.gov/pr/laws/esa/. Note that compliance with both the state and federal ESAs is required of projects having the potential to impact state and federal special-status species. Although overlap exists between the state and federal ESAs, there might be additional or more restrictive state requirements. For further information on the state ESA, refer to the California Department of Fish and Game website at http://www.dfg.ca.gov/habcon/cesa/.

2. Magnuson-Stevens Fishery Conservation and Management Act, Essential Fish Habitat (EFH):

The Magnuson-Stevens Fishery Conservation and Management Act, as amended, is designed to manage and conserve national fishery resources. EFH consultations are only required for actions that may adversely effect EFH. The applicant needs to determine whether the proposed project may adversely affect EFH. NMFS is responsible for publishing maps and other information on the locations of designated EFH, and can provide information on ways to promote conservation of EFHs to facilitate this assessment. If a project may adversely affect a designated EFH, the applicant must complete an EFH consultation.

The State Water Board will coordinate with the USEPA to request an EFH consultation from the NMFS. NMFS is required to respond informally or in writing. NMFS comments may include conservation measures, for which the applicant's CWSRF financing agreement will be conditioned to ensure compliance. For more information, see the brochure at http://www.nmfs.noaa.gov/sfa/reg_svcs/Council%20stuff/council%20orientation/2007/2007TrainingCD/TabT-EFH/EFH_CH_Handout_Final_3107.pdf.

3. National Historic Preservation Act (NHPA), Section 106:

The NHPA focuses on federal compliance. Section 106 requires Federal agencies to take into account the effects of their undertakings on historic properties. The Section 106 process seeks to accommodate historic preservation concerns with the needs of Federal undertakings through consultation among the agency official and other parties with an interest in the effects of the undertaking on historic properties. The goal of consultation is to identify historic properties potentially affected by the undertaking, assess its effects and seek ways to avoid, minimize or mitigate any adverse effects on historic properties. The Section 106 compliance efforts and reports must be prepared by a qualified researcher that meets the Secretary of the Interior's Professional Qualifications Standards (www.cr.nps.gov/local-law/arch_stnds_9.htm).

In addition, CEQA requires that impacts to cultural and historic resources be analyzed. The "CEQA and Archeological Resources" section from the Governor's Office of Planning and Research CEQA Technical Advice Series states that the lead agency obtains a current records search from the appropriate California Historical Resources Information System Center. Also, to contact the Native American tribes that are culturally affiliated with a project area from the list obtained from the Native American Heritage Commission (NAHC).

The NAHC can be contacted at:

915 Capitol Mall, Room 364
Sacramento, CA 95814
Tele: (916) 653-4082

4. Clean Air Act:

For CWSRF financed projects, we recommend including a general conformity section in the CEQA documents so that another public review process will not be needed, should a conformity determination be required. The applicant should check with its local air quality management district and review the Air Resources Board California air emissions map for information on the State Implementation Plan. For information on the analysis steps involved in evaluating conformity, please contact the State Water Board environmental staff through the assigned Project Manager.

5. Coastal Zone Management Act:

Projects proposing construction in the Coastal Zone will require consultation with either the California Coastal Commission (or the designated local agency with a Local Coastal Program), or the San Francisco Bay Conservation and Development Commission (for projects located in the San Francisco Bay area). The applicant must submit a copy of the approved Coastal Development permit to the State Water Board to satisfy this requirement.

For more information on Coastal Zone Management Act requirements refer to the following agencies websites:

- United States Coastal Zone Boundaries through the NMFS website at http://coastalmanagement.noaa.gov/mystate/docs/StateCZBoundaries.pdf;
- California Coastal Commission website at http://www.coastal.ca.gov/ccatc.html; and/or
- San Francisco Bay Conservation and Development Commission website at http://www.bcdc.ca.gov/.

6. Coastal Barriers Resources Act:

The Coastal Barriers Resources Act is intended to discourage development in the Coastal Barrier Resources System and adjacent wetlands, marshes, estuaries, inlets, and near-shore waters. Since there is no designated Coastal Barrier Resources System in California, no impacts from California projects are expected. However, should the applicant believe there may be impacts to the Coastal Barrier Resources System due to special circumstances, please use the following information as a guide.

During the planning process, the applicant should consult with the appropriate Coastal Zone management agency (e.g., City or County with an approved Local Coastal Program, the California Coastal Commission, or the San Francisco Bay Conservation and Development Commission) to determine if the project will have an effect on the Coastal Barrier Resources System. If the project will have an effect on the Coastal Barrier Resources System, the State Water Board must consult with the appropriate Coastal Zone management agency and the USFWS. Any recommendations from the Coastal Zone management agency and USFWS will be incorporated into the project's design prior to approval of CWSRF financing.

For more information and to ensure that no modifications to Coastal Barrier Resources System have occurred, please visit: http://www.fws.gov/CBRA/.

7. Farmland Protection Policy Act:

Projects involving impacts to farmland designated as prime and unique, local and statewide importance, or under a Williamson Act Contract, will require consultation with the United States Department of Agriculture, Natural Resources Conservation Service and/or California Department of Conservation. For more information on the Farmland Protection Policy Act go to http://www.nrcs.usda.gov/programs/fppa, and regarding the Williamson Act Contact go to http://www.consrv.ca.gov/dlrp/lca.

8. Floodplain Management – Executive Order 11988:

Each agency shall take action to reduce the risk of flood loss, to minimize the impact of floods on human safety, health and welfare, and to restore and preserve the natural and beneficial values served by floodplains in carrying out its responsibilities. Before taking an action, each agency shall determine whether the proposed action will occur in a designated floodplain. The generally established standard for risk is the flooding level that is expected to occur every 100 years. If an agency determines or proposes to, conduct, support, or allow an action to be located in a floodplain, the agency shall consider alternatives to avoid adverse effects and incompatible development in the floodplains.

For further information regarding Floodplain Management requirements, please consult the United States Department of Homeland Security, Federal Emergency Management Agency website at http://www.fema.gov, as well as the USEPA floodplain management Executive Order 11988 at http://www.epa.gov/owow/wetlands/regs/eo11988.html.

9. Migratory Bird Treaty Act (MBTA):

The MBTA restricts the killing, taking, collecting and selling or purchasing of native bird species or their parts, nests, or eggs. The MBTA, along with subsequent amendments to this act, provides legal protection for almost all breeding bird species occurring in the United States and must be addressed under CEQA. In the CEQA document, each agency must make a finding that a project will comply with the MBTA. For further information, please consult the Migratory Bird Program through the USFWS website at http://www.fws.gov/laws/lawsdigest/migtrea.html.

10. Protection of Wetlands – Executive Order 11990:

Projects, regardless of funding, must get approval for any temporary or permanent disturbance to federal and state waters, wetlands, and vernal pools. The permitting process through the United States Army Corps of Engineers (USACE) can be lengthy, and may ultimately require project alterations to avoid wetlands and waters of the United States. Applicants must consult with the USACE early in the planning process if any portion of the project site contains wetlands, or other federal waters. The USACE Wetland Delineation Manual is available at http://www.wetlands.com/regs/tlpge02e.htm. Also note that the California State Water Boards are involved in providing approvals through the Clean Water Act Section 401 Water Quality Certification Program and/or Waste Discharge Requirements. For more information, please go to http://www.waterboards.ca.gov/water_issues/programs/cwa401/index.shtml.

11. Wild and Scenic Rivers Act:

There are construction restrictions or prohibitions for projects near or in a designated "wild and scenic river." A listing of designated "wild and scenic rivers" can be obtained at http://www.rivers.gov/rivers/california.php. Watershed information can be obtained through the "Watershed Browser" at http://cwp.resources.ca.gov/map_tools.php.

12. Safe Drinking Water Act, Source Water Protection:

Projects must comply with the Safe Drinking Water Act and document whether or not a project has the potential to contaminate a sole source aquifer. For projects impacting a listed sole source aquifer, the applicant must identify an alternative project location, or develop adequate mitigating measures in consultation with the USEPA. For more information, please go to the Sole Source Aquifer Program website at http://epa.gov/region09/water/groundwater/ssa.html.

13. Environmental Justice – Executive Order No. 12898:

Identify and address any disproportionately high and adverse human health or environmental effects of the project's activities on minority and low-income populations. USEPA has defined environmental justice as "the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies."

Fair Treatment means that no group of people should bear a disproportionate burden of environmental harms and risks, including those resulting from the negative consequences of industrial, governmental, and commercial operations or programs and policies.

Meaningful Involvement means that: 1) potentially affected community members have an appropriate opportunity to participate in decisions about a proposed activity that will affect their environment and/or health; 2) the public's contribution can influence the agency's decision; 3) the concerns of all participants involved will be considered in the decision-making process; and 4) the decision-makers seek out and facilitate the involvement of those potentially affected.

The term "environmental justice concern" is used to indicate the actual or potential lack of fair treatment or meaningful involvement of minority, low-income, or indigenous populations, or tribes in the development, implementation, and enforcement of environmental laws, regulations, and policies.

Your project may involve an "environmental justice concern" if the project could:

a) Create new disproportionate impacts on minority, low-income, or indigenous populations;
b) Exacerbate existing disproportionate impacts on minority, low-income, or indigenous populations; or
c) Present opportunities to address existing disproportionate impacts on minority, low-income, or indigenous populations that are addressable through the project.

Attachment 1

ENVIRONMENTAL[1] PACKAGE CHECKLIST FOR APPLICANT (What to Submit to Project Manager)

Required for all CWSRF Projects:

- ❑ **Evaluation Form for Environmental Review and Federal Coordination with the substantiating information** (i.e. USFWS species list/biological assessment, cultural resources documentation, air quality data, flood map etc.)
- ❑ **Project Report, Scope of Work and Map(s)**

Based on the type of CEQA documents prepared for the project, provide additional information as identified in the following boxes.

If project is covered under a **CEQA Categorical or Statutory Exemption**, submit a copy of the following:

- ❑ **Notice of Exemption** (filed and date stamped by the county clerk and the Governor's Office of Planning and Research)

If project is covered under a **Negative Declaration**, submit a copy of the following:

- ❑ **Draft and Final Initial Study/Negative Declaration (IS/ND)**
  - ❑ Comments and Responses to the Draft IS/ND
- ❑ **Resolution approving the CEQA documents**
  - ❑ Adopting the Negative Declaration
  - ❑ Making CEQA Findings
- ❑ **Notice of Determination** (filed and date stamped by the county clerk and the Governor's Office of Planning and Research)

If project is covered under a **Mitigated Negative Declaration**, submit a copy of the following:

- ❑ **Draft and Final Initial Study/Mitigated Negative Declaration (IS/MND)**
  - ❑ Comments and Responses to the Draft IS/MND
  - ❑ Mitigation Monitoring and Reporting Plan/Program (MMRP)
- ❑ **Resolution approving the CEQA documents**
  - ❑ Adopting the Mitigated Negative Declaration and the MMRP
  - ❑ Making CEQA Findings
- ❑ **Notice of Determination** (filed and date stamped by the county clerk and the Governor's Office of Planning and Research)

If project is covered under an **Environmental Impact Report (EIR)**, submit a copy of the following:

- ❑ **Draft and Final EIR**
  - ❑ Comments and Responses to the Draft EIR
  - ❑ Mitigation Monitoring and Reporting Plan/Program (MMRP)
- ❑ **Resolution approving the CEQA documents**
  - ❑ Certifying the EIR and adopting the MMRP
  - ❑ Making CEQA Findings
  - ❑ Adopting a Statement of Overriding Considerations for any adverse environmental impact(s), if applicable
- ❑ **Notice of Determination** (filed and date stamped by the county clerk and the Governor's Office of Planning and Research)

If EIR is a joint CEQA/National Environmental Policy Act document (EIR/Environmental Impact Statement or EIR/Environmental Assessment), submit the applicable Record of Decision and/or the Finding of No Significant Impact.

[1] If the CEQA document is more than five years old applicant shall provide an updated CEQA document (eg. subsequent, supplemental, or addendum CEQA documents) or a letter that describes the current status of the environmental condition for the project's location.

State Water Resources Control Board (State Water Board)
Clean Water State Revolving Fund Program

Evaluation Form for Environmental Review and Federal Coordination

CWSRF No.: _____

Applicant Name: _____

Date: _____

Project Title: _____

1. **Federal Endangered Species Act (ESA), Section 7:**
Does the project involve any direct effects from construction activities, or indirect effects such as growth inducement that may affect federally listed threatened or endangered species or their critical habitat that are known, or have a potential, to occur on-site, in the surrounding area, or in the service area?

   a. **Required documents: Attach project-level biological surveys, evaluations analyzing the project's direct and indirect effects on special-status species, and an up-to-date species list (from the United States Fish and Wildlife Service and the California Natural Diversity Database) for the project area.**

☐ No. Discuss why the project will not impact any federally listed special status species:

_____

_____

_____

_____

_____

_____

_____

_____

_____

_____

☐ Yes. Provide information on federally listed species that could potentially be affected by this project and any proposed avoidance and compensation measures so that the State Water Board can initiate informal/formal consultation with the applicable federally designated agency. Document any previous ESA consultations that may have occurred for the project. Include any comments below:

_____

_____

_____

_____

_____

_____

_____

_____

_____

2. **<u>Magnuson-Stevens Fishery Conservation and Management Act, Essential Fish Habitat</u>: Does the project involve any direct effects from construction activities, or indirect effects such as growth inducement that may adversely affect essential fish habitat?**

☐ No. Discuss why the project will not impact essential fish habitat:

☐ Yes. Provide information on essential fish habitat that could potentially be affected by this project and any proposed avoidance and compensation measures. Document any consultations with the National Marine Fisheries Service that may have occurred for the project. Include any comments below:

3. **<u>National Historic Preservation Act, Section 106</u>: Identify the area of potential effects (APE), including construction, staging areas, and depth of any excavation. (Note: the APE is three dimensional and includes all areas that may be affected by the project, including the surface area and extending below ground to the depth of any project excavations).**

- **Required documents: Cultural Resources Assessment** prepared by a prepared by a qualified researcher that meets the Secretary of the Interior's Professional Qualifications Standards (www.cr.nps.gov/local-law/arch_stnds_9.htm). **Current records search** with maps showing all sites and surveys drawn in relation to the project area, and records of **Native American consultation.** Include any comments below:

4. **Federal Clean Air Act:**

Identify Air Basin Name _____

Name of the Local Air District for Project Area: _____

Is the project subject to a State Implementation Plan (SIP) conformity determination?

☐ No. The project is in an attainment or unclassified area for all federal criteria pollutants.

☐ Yes. The project is in a nonattainment area or attainment area subject to maintenance plans for a federal criteria pollutant. Include information to indicate the nonattainment designation (e.g. moderate, serious, severe, or extreme), if applicable. If estimated emissions (below) are above the federal de minimis levels, but the project is sized to meet only the needs of current population projections that are used in the approved SIP for air quality, then quantitatively indicate how the proposed capacity increase was calculated using population projections.

- **If you checked "Yes" above, provide the estimated project construction and operational air emissions (in tons per year) in the chart below, and attach supporting calculations.**
- **Also, attach any air quality studies that may have been done for the project.**

Pollutant	Federal Status (Attainment, Nonattainment, Maintenance, or Unclassified)	Nonattainment Rates (i.e., moderate, serious, severe, or extreme)	Threshold of Significance for Project Air Basin (if applicable)	Construction Emissions (Tons/Year)	Operation Emissions (Tons/Year)
Ozone (O_3)					
Carbon Monoxide (CO)					
Oxides of Nitrogen (NO_x)					
Reactive Organic Gases (ROG)					
Volatile Organic Compounds (VOC)					
Lead (Pb)					
Particulate Matter less than 2.5 microns in diameter ($PM_{2.5}$)					
Particulate Matter less than 10 microns in diameter (PM_{10})					
Sulfur Dioxide (SO_2)					

5. **Coastal Zone Management Act:**

Is any portion of the project site located within the coastal zone?

☐ No. The project is not within the coastal zone.

☐ Yes. Describe the project location with respect to coastal areas and the status of the coastal zone permit, and provide a copy of the coastal zone permit or coastal exemption:

_____

_____

_____

_____

_____

_____

6. **Coastal Barriers Resources Act:**
Will the project impact or be located within or near the Coastal Barrier Resources System or its adjacent wetlands, marshes, estuaries, inlets, and near-shore waters? Note that since there is currently no Coastal Barrier Resources System in California, projects located in California are not expected to impact the Coastal Barrier Resources System in other states. If there is a special circumstance in which the project may impact a Coastal Barrier Resource System, indicate your reasoning below.

☐ No. The project will not impact or be located within or near the Coastal Barrier Resources System or its adjacent wetlands, marshes, estuaries, inlets, and near-shore waters.

☐ Yes. Describe the project location with respect to the Coastal Barrier Resources System, and the status of any consultation with the appropriate Coastal Zone management agency and the United States Fish and Wildlife Service:

_____
_____
_____
_____

7. **Farmland Protection Policy Act:**
Is any portion of the project located on important farmland?

☐ No. The project will not impact farmland.

☐ Yes. Include information on the acreage that would be converted from important farmland to other uses. Indicate if any portion of the project boundaries is under a Williamson Act Contract and specify the amount of acreage affected:

_____
_____
_____
_____
_____

8. **Flood Plain Management:**
Is any portion of the project located within a 100-year floodplain as depicted on a floodplain map or otherwise designated by the Federal Emergency Management Agency?

- **Required documents: Attach a floodplain map.**

☐ No. Provide a description of the project location with respect to streams and potential floodplains:

_____

☐ Yes. Describe the floodplain, and include a floodplains/wetlands assessment. Describe any measures and/or project design modifications that would be implemented to minimize or avoid project impacts:

_____
_____
_____
_____

9. **Migratory Bird Treaty Act:**
Will the project affect protected migratory birds that are known, or have a potential, to occur on-site, in the surrounding area, or in the service area?

☐ No. Provide an explanation below.

_____

_____

_____

_____

☐ Yes. Discuss the impacts (such as noise and vibration impacts, modification of habitat) to migratory birds that may be directly or indirectly affected by the project and mitigation measures to reduce or eliminate these impacts. Include a list of all migratory birds that could occur where the project is located:

_____

_____

_____

_____

10. **Protection of Wetlands:**
Does any portion of the project boundaries contain areas that should be evaluated for wetland delineation or require a permit from the United States Army Corps of Engineers?

☐ No. Provide the basis for such a determination:

_____

_____

_____

_____

☐ Yes. Describe the impacts to wetlands, potential wetland areas, and other surface waters, and the avoidance, minimization, and mitigation measures to reduce such impacts. Provide the status of the permit and information on permit requirements:

_____

_____

_____

_____

11. **Wild and Scenic Rivers Act:**
Identify watershed where the project is located: _____

Is any portion of the project located within a wild and scenic river?

☐ No. The project is not located near a wild and scenic river.

☐ Yes. Identify the wild and scenic river watershed and project location relative to the affected wild and scenic river:

_____

_____

_____

_____

12. **Safe Drinking Water Act, Sole Source Aquifer Protection:**
Is the project located in an area designated by the United States Environmental Protection Agency, Region 9, as a Sole Source Aquifer?

☐ No. The project is not within the boundaries of a sole source aquifer.

☐ Yes. Contact USEPA, Region 9 staff to consult, and identify the sole source aquifer (e.g., Santa Margarita Aquifer, Scott's Valley, the Fresno County Aquifer, the Campo/Cottonwood Creek Aquifer or the Ocotillo-Coyote Wells Aquifer) that will be impacted:

_____

_____

13. **Environmental Justice:**
Does the project involve an activity that is likely to be of particular interest to or have particular impact upon minority, low-income, or indigenous populations, or tribes?

☐ No. Selecting "No" means that this action is not likely to be of any particular interest to or have an impact on these populations or tribes. Explain.

_____

_____

_____

_____

_____

☐ Yes. If you answer yes, please check at least one of the boxes and provide a brief explanation below:

☐ The project is likely to impact the health of these populations.

☐ The project is likely to impact the environmental conditions of these populations.

☐ The project is likely to present an opportunity to address an existing disproportionate impact of these populations.

☐ The project is likely to result in the collection of information or data that could be used to assess potential impacts on the health or environmental conditions of these populations.

☐ The project is likely to affect the availability of information to these populations.

☐ Other reasons, describe: _____

_____

_____

_____

_____

_____

_____

BASIC CRITERIA FOR CULTURAL RESOURCES REPORTS

FOR SECTION 106 CONSULTATION WITH THE STATE HISTORIC PRESERVATION OFFICER (SHPO) UNDER THE NATIONAL HISTORIC PRESERVATION ACT (NHPA)

CULTURAL RESOURCES REPORTS

The Section 106 compliance efforts and reports must be prepared by a qualified researcher that meets the Secretary of the Interior's Professional Qualifications Standards (www.cr.nps.gov/local-law/arch_stnds_9.htm).

REPORT TERMINOLOGY

- A cultural resources report used for Section 106 consultation should use terminology consistent with the NHPA.
- This doesn't mean that the report needs to "filled" with passages and interpretations of the regulations, the SHPO reviewer already knows the law.
- If "findings" are made they must be one of the four "findings" listed in Section 106. These include:

  "No historic properties affected" (no properties are within the APE, including the below ground APE).

  "No effect to historic properties" (properties may be near the APE but the project will not impact them).

  "No adverse effect to historic properties" (the project may affect historic properties but the impacts will not be adverse)

  "Adverse effect to historic properties". *Note: the SHPO must be consulted at this point. If your consultant proceeds on his own, his efforts may be wasted.*

CURRENT RECORDS SEARCH INFORMATION

- A current (less than a year old) records search from the appropriate Information Center is necessary. The records search should include maps that show all recorded sites and surveys in relation to the area of potential effects (APE) for the project.
- The APE is three-dimensional and includes all areas that may be affected by the project. It includes the surface area and extends below ground to the depth of any project excavations.
- The records search request should be made for an area larger than the APE. The appropriate area varies for different projects but should be drawn large enough to provide information on what types of sites may exist in the vicinity.

NATIVE AMERICAN AND INTERESTED PARTY CONSULTATION

- Native American and interested party consultation should be initiated at the beginning of any cultural resource investigations. The purpose is to gather information from people with local knowledge that may be used to guide research.

- A project description and map should be sent to the Native American Heritage Commission (NAHC) requesting a check of their Sacred Lands Files. The Sacred Lands Files include religious and cultural places that are not recorded at the information centers.

- The NAHC will include a list of Native American groups and individuals with their response. A project description and maps should be sent to everyone on the list asking for information on the project area.

- Similar letters should be sent to local historical organizations.

- Follow-up contact should be made by phone if possible and a phone log should be included in the report.

WARNING PHRASES IN ALREADY PREPARED CEQA REPORTS

- A finding of **"no known resources"**, this doesn't mean anything. The consultant's job is to find out if there are resources within the APE or to explain why they are not present.

- **"The area is sensitive for buried archaeological resources",** followed by a statement that **"monitoring is recommended as mitigation".** Monitoring is not an acceptable mitigation. A reasonable effort should be made to find out if buried resources are present in the APE.

- **"The area is already disturbed by previous construction",** this may be true, but documentation is still needed to show that the new project will not affect cultural resources. As an example, an existing road can be protecting a buried archaeological site. Or, previous construction may have impacted an archaeological site that was never documented.

- No mention of **"Section 106"**, a report that gives adequate information for CEQA may not be sufficient to comply with Section 106.

S:\Funding Programs\Environmental Review Unit\Outreach\BASIC CRITERIA FOR SECTION 106 revised June 13 2012 by md.doc

VALLE DE ORO COMMUNITY PLANNING GROUP
SUBCOMMITTEE REPORT RE:
NOTICE OF PREPARATION FOR THE SPEIR TO THE OWD 2010 PROGRAM EIR
August 2, 2012

1. County General Plan (recently updated) should be used to determine projected growth in unincorporated areas – not SANDAG forecasts which we have found to contain significant errors and unsupportable assumptions.

2. All three alternatives involve possible expansion of the Rancho San Diego (RSD) Pump Station, but no mention is made of the growth-inducement mitigation that was required prior to its construction and operation in the Jamacha basin. This mitigation was implemented by County Policy I-107 and the County General Plan which restrict the use of this facility as a sewage conveyance to only areas within the Urban Limit Line established by the County and depicted on their General Plan maps.

   Nothing has changed that would invalidate the need for or appropriateness of this growth-inducement mitigation.

3. Under Alternative 1:
   a. Decommissioning the wastewater recycling facility may shift significant wastewater flows that Otay has developed outside of the Urban Limit Line to the Rancho San Diego pump facility. Such a shift would violate County Government Policy, the County General Plan, and would violate State environmental laws by ignoring the growth-inducement mitigation required to build and operate the pump station.

   b. Given its location in the U.S. Wildlife Refuge and adjacent to highly sensitive riparian-woodland habitat, any "required" RSD Pump Station improvements (expansion) would probably produce significant unmitigable impacts to sensitive biological resources.

   c. It is our understanding that the RSD Pump Station is owned and operated by County Government and any modifications or expansion would require land-use approvals from County Government.

4. Under Alternative 2:
   a. Possible doubling of the wastewater recycling facility capacity is included in this Alternative. Given the facility's location in a highly sensitive habitat area of the U.S. Wildlife Refuge, such expansion of the facility could result in significant unmitigable impacts to sensitive biological resources.

b. Also included is the addition of handling/treating solid waste onsite. Such an additional use would probably require further expansion of the facility footprint and worsen the direct impacts to sensitive biological resources. Additional impacts to humans and wildlife may also occur due to noxious odors (inherent in processing such solid waste) and possible contamination-laden dust or contaminated storm-water entering the Sweetwater riparian floodplain or nearby upland habitat areas.

c. The comments of 3.b & 3.c regarding the RSD Pump Station also apply to this Alternative.

5. Under Alternative 3:
   a. Possible tripling of the wastewater recycling facility capacity and the addition of handling/treating solid waste onsite is included in this Alternative. Thus, all of the above comments in 3.b, 3.c, 4.a, and 4.b apply to this alternative with the possibility of even greater impacts in each case.

   b. A recycling facility expansion of this magnitude would negate the ability of the RSD Pump Station to function as an emergency back-up in case of a major failure of the recycling facility. This would significantly increase the risk of a major sewer spill into the Sweetwater River basin and ultimately Sweetwater Lake.

   c. This Alternative clearly states an intent to "Expand to Accept Wastewater From Other Service Areas." This expansion intent coupled with use of the RSD Pump Station as additional capacity, would project growth-inducing urban sewer infrastructure throughout the rural areas of the Jamacha Basin, Jamul, and Crest/Dehesa/Harbison Canyon. Its use would indicate a District policy of unmitigated growth inducement into the County's rural land-use areas and inappropriate and unauthorized use of the RSD Pump Station. This Alternative will have significant and unmitigable growth-inducement impacts.

Jack L. Phillips, Chairman VDOCPG

Department of Toxic Substances Control

Matthew Rodriquez
Secretary for
Environmental Protection

Deborah O. Raphael, Director
5796 Corporate Avenue
Cypress, California 90630

Edmund G. Brown Jr.
Governor

August 14, 2012

Ms. Lisa Coburn-Boyd
Otay Water District
2554 Sweetwater Springs Boulevard
Spring Valley, California 91978-2004

NOTICE OF PREPARATION (NOP) FOR A DRAFT SUPPLEMENTAL PROGRAM ENVIRONMENTAL REPORT FOR THE OTAY WATER DISTRICT WASTEWATER MANAGEMENT PLAN UPDATE PROJECT (SCH#2012071069), SAN DIEGO COUNTY

Dear Ms. Coburn-Boyd:

The Department of Toxic Substances Control (DTSC) has received your submitted Notice of Preparation of a Draft Supplemental Program Environmental Impact Report (SPEIR) for the above-mentioned project. The following project description is stated in your document:

"The purpose of the Otay Water District (OWD) Waste water Management Plan (WWMP) is to supplement the 2009 Water Management Plan Update (WRMP), identify and evaluate current wastewater facilities (e.g., wastewater pumping stations and treatment plants), design feasible wastewater management strategies that allow the OWD to meet projected future wastewater needs within the OWD planning area and adjacent areas of influence, and to develop a phased and systematic approach to implement the wastewater management strategies during future time frames. The WWMP currently consists of several wastewater alternatives with differing project features and components."

Based on the review of the submitted document DTSC has the following comments:

1) The SPEIR should evaluate whether conditions within the Project area may pose a threat to human health or the environment. Following are the databases of some of the regulatory agencies:

   - National Priorities List (NPL): A list maintained by the United States Environmental Protection Agency (U.S.EPA).

- EnviroStor (formerly CalSites): A Database primarily used by the California Department of Toxic Substances Control, accessible through DTSC's website (see below).

- EnviroStor (formerly CalSites): A Database primarily used by the California Department of Toxic Substances Control, accessible through DTSC's website (see below).

- Resource Conservation and Recovery Information System (RCRIS): A database of RCRA facilities that is maintained by U.S. EPA.

- Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS): A database of CERCLA sites that is maintained by U.S.EPA.

- Solid Waste Information System (SWIS): A database provided by the California Integrated Waste Management Board which consists of both open as well as closed and inactive solid waste disposal facilities and transfer stations.

- GeoTracker: A List that is maintained by Regional Water Quality Control Boards.

- Local Counties and Cities maintain lists for hazardous substances cleanup sites and leaking underground storage tanks.

- The United States Army Corps of Engineers, 911 Wilshire Boulevard, Los Angeles, California, 90017, (213) 452-3908, maintains a list of Formerly Used Defense Sites (FUDS).

2) The SPEIR should identify the mechanism to initiate any required investigation and/or remediation for any site within the proposed Project area that may be contaminated, and the government agency to provide appropriate regulatory oversight. If necessary, DTSC would require an oversight agreement in order to review such documents.

3) Any environmental investigations, sampling and/or remediation for a site should be conducted under a Workplan approved and overseen by a regulatory agency that has jurisdiction to oversee hazardous substance cleanup. The findings of any investigations, including any Phase I or II Environmental Site Assessment Investigations should be summarized in the document. All sampling results in which hazardous substances were found above regulatory standards should be clearly summarized in a table. All closure, certification or remediation approval reports by regulatory agencies should be included in the SPEIR.

4) If buildings, other structures, asphalt or concrete-paved surface areas are being planned to be demolished, an investigation should also be conducted for the presence of other hazardous chemicals, mercury, and asbestos containing materials (ACMs). If other hazardous chemicals, lead-based paints (LPB) or products, mercury or ACMs are identified, proper precautions should be taken during demolition activities. Additionally, the contaminants should be remediated in compliance with California environmental regulations and policies.

5) Future project construction may require soil excavation or filling in certain areas. Sampling may be required. If soil is contaminated, it must be properly disposed and not simply placed in another location onsite. Land Disposal Restrictions (LDRs) may be applicable to such soils. Also, if the project proposes to import soil to backfill the areas excavated, sampling should be conducted to ensure that the imported soil is free of contamination.

6) Human health and the environment of sensitive receptors should be protected during any construction or demolition activities. If necessary, a health risk assessment overseen and approved by the appropriate government agency should be conducted by a qualified health risk assessor to determine if there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment.

7) If the project site was used for agricultural, livestock or related activities, onsite soils and groundwater might contain pesticides, agricultural chemical, organic waste or other related residue. Proper investigation, and remedial actions, if necessary, should be conducted under the oversight of and approved by a government agency at the site prior to construction of the project.

8) If it is determined that hazardous wastes are, or will be, generated by the proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, Chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5). If it is determined that hazardous wastes will be generated, the facility should also obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942. Certain hazardous waste treatment processes or hazardous materials, handling, storage or uses may require authorization from the local Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA.

9) DTSC can provide cleanup oversight through an Environmental Oversight Agreement (EOA) for government agencies that are not responsible parties, or a Voluntary Cleanup Agreement (VCA) for private parties. For additional information on the EOA or VCA, please see

www.dtsc.ca.gov/SiteCleanup/Brownfields, or contact Ms. Maryam Tasnif-Abbasi, DTSC's Voluntary Cleanup Coordinator, at (714) 484-5489.

If you have any questions regarding this letter, please contact Rafiq Ahmed, Project Manager, at rahmed@dtsc.ca.gov, or by phone at (714) 484-5491.

Sincerely,

Rafiq Ahmed
Project Manager
Brownfields and Environmental Restoration Program

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044
state.clearinghouse@opr.ca.gov.

CEQA Tracking Center
Department of Toxic Substances Control
Office of Environmental Planning and Analysis
P.O. Box 806
Sacramento, California 95812
Attn: Nancy Ritter
nritter@dtsc.ca.gov

CEQA # 3621

State of California -The Natural Resources Agency
DEPARTMENT OF FISH AND GAME
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
http://www.dfg.ca.gov

EDMUND G. BROWN JR., Governor
CHARLTON H. BONHAM, Director

August 17, 2012

Ms. Lisa Coburn-Boyd
Otay Water District
2554 Sweetwater Springs Boulevard
Spring Valley, CA 91978-2004

Subject: Comments on the Notice of Preparation of a Draft Environmental Impact Report (DEIR) for the Otay Water District Wastewater Management Plan Update (SCH# 2012071069)

Dear Ms. Coburn-Boyd:

The Department of Fish and Game (Department) has reviewed the above-referenced Notice of Preparation (NOP) for the Otay Water District Wastewater Management Plan Update Draft Environmental Impact Report (DEIR). The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act, [CEQA] Guidelines §15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code §2050 *et seq.*) and Fish and Game Code section 1600 *et seq*. The Department also administers the Natural Community Conservation Planning (NCCP) program. Otay Water District (OWD) has prepared a draft NCCP Subarea Plan (SAP) under the Joint Water Agencies Subregional Plan; these plans are currently under review by the Department and the U.S. Fish and Wildlife Service.

The purpose of the OWD Wastewater Management Plan (WWMP) is to supplement the 2009 Water Resources Management Plan Update (WRMP) on which the Department provided comments (Department of Fish and Game and United States Fish and Wildlife Service joint letter dated September 3, 2009). The WWMP will identify and evaluate current wastewater facilities and design feasible wastewater management strategies in order to meet projected future wastewater needs within the OWD planning area. The WWMP consists of three alternatives including: eliminating all wastewater treatment within the OWD Service Area, recycling all wastewater flows within the OWD Service Area, and recycling all wastewater flows within the OWD Service Area plus expanding to accept wastewater from other service areas.

The Department offers the following comments and recommendations to assist OWD in avoiding or minimizing potential impacts to biological resources.

Specific Comments

1. The DEIR should adequately address how the WWMP relates to any approved NCCP Subarea Plans (San Diego County, City of San Diego, and City of Chula Vista) and OWD's draft SAP.

2. Although the document will be prepared as a Program DEIR, we recommend including as much specificity as possible. This includes, but is not limited to, identifying and

quantifying (to the extent possible) any direct, indirect, or cumulative impacts to sensitive species or habitat types that could be associated with each of the alternatives, as well as identifying the mitigation that would be required to offset those impacts. This will allow the Department to provide useful feedback prior to the subsequent environmental review required for future wastewater projects.

General Comments

1. The Department has responsibility for wetland and riparian habitats. It is the policy of the Department to strongly discourage development in wetlands or conversion of wetlands to uplands. We oppose any development or conversion which would result in a reduction of wetland acreage or wetland habitat values, unless, at a minimum, project mitigation assures there will be "no net loss" of either wetland habitat values or acreage. Development and conversion include but are not limited to conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether intermittent or perennial, should be retained and provided with substantial setbacks which preserve the riparian and aquatic values and maintain their value to on-site and off-site wildlife populations. Mitigation measures to compensate for impacts to mature riparian habitats must be included in the DEIR. The DEIR should also analyze potential effects wildlife movement corridors and identify measures to avoid, minimize, and mitigate such effects.

   a) If the project area supports aquatic, riparian, or wetland habitats, a jurisdictional delineation of the creeks and their associated riparian habitats should be included in the DEIR. The delineation should be conducted pursuant to the U. S. Fish and Wildlife Service wetland definition adopted by the Department.[1] Please note that some wetland and riparian habitats subject to the Department's authority may extend beyond the jurisdictional limits of the U.S. Army Corps of Engineers.

   b) The Department also has regulatory authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of a river or stream, or use material from a streambed. For any such activities, the project applicant (or "entity") must provide written notification to the Department pursuant to section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, the Department determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. The Department's issuance of a LSA for a project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. The Department as a Responsible Agency under CEQA may consider the local jurisdiction's (lead agency) Negative Declaration or Environmental Impact Report for the project. To minimize additional requirements by the Department pursuant to section 1600 et seq. and/or under CEQA, the document should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.[2]

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

[2] A notification package for a LSA may be obtained by accessing the Department's web site at www.dfg.ca.gov/1600 .

2. The following comment applies until OWD's NCCP SAP is approved and take authorization is granted for the species covered by the plan. The Department considers adverse impacts to a species protected by the California Endangered Species Act (CESA), for the purposes of CEQA, to be significant without mitigation. As to CESA, take of any endangered, threatened, or candidate species that results from the project is prohibited, except as authorized by state law (Fish and Game Code, §§ 2080, 2085.) Consequently, if the Project, Project construction, or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, the Department recommends that the project proponent seek appropriate take authorization under CESA prior to implementing the project. Appropriate authorization from the Department may include an incidental take permit (ITP) or a consistency determination in certain circumstances, among other options (Fish and Game Code §§ 2080.1, 2081, subds. (b),(c)). Early consultation is encouraged, as significant modification to a project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that the Department issue a separate CEQA document for the issuance of an ITP unless the project CEQA document addresses all project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

3. To enable the Department to adequately review and comment on the proposed project from the standpoint of the protection of plants, fish and wildlife, we recommend that the following information be included in the DEIR.

   a) A complete discussion of the purpose and need for, and description of, the proposed project, including all staging areas and access routes to the construction and staging areas.

   b) A range of feasible alternatives to ensure that alternatives to the proposed project are fully considered and evaluated; the alternatives should avoid or otherwise minimize impacts to sensitive biological resources. Specific alternative locations should be evaluated in areas with lower resource sensitivity where appropriate.

<u>Biological Resources within the Project's Area of Potential Effect</u>

4. To provide a complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats, the DEIR should include the following information.

   a) Per CEQA Guidelines, section 15125(c), information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis should be placed on resources that are rare or unique to the region.

   b) A thorough assessment of rare plants and rare natural communities, following the Department's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (see: http://www.dfg.ca.gov/habcon/plant/) (hard copy available on request).

c) A current inventory of the biological resources associated with each habitat type on site and within the area of potential effect. The Department's California Natural Diversity Data Base in Sacramento should be contacted at (916) 322-2493 or www.dfg.ca.gov /biogeodata/ to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.

d) An inventory of rare, threatened, and endangered, and other sensitive species on site and within the area of potential effect. Species to be addressed should include all those which meet the CEQA definition (see CEQA Guidelines, §15380). This should include sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and the U.S. Fish and Wildlife Service.

Analyses of the Potential Project-Related Impacts on the Biological Resources

5. To provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the DEIR.

a) A discussion of potential adverse impacts from lighting, noise, human activity, exotic species, and drainage should be included. The latter subject should address: project-related changes on drainage patterns on and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site. The discussions should also address the proximity of the extraction activities to the water table, whether dewatering would be necessary, and the potential resulting impacts on the habitat, if any, supported by the groundwater. Mitigation measures proposed to alleviate such impacts should be included.

b) Discussions regarding indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a NCCP). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DEIR.

c) The zoning of areas for development projects or other uses that are nearby or adjacent to natural areas may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the environmental document.

d) A cumulative effects analysis should be developed as described under CEQA Guidelines, section 15130. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

Mitigation for the Project-related Biological Impacts

6. The DEIR should include measures to fully avoid and otherwise protect Rare Natural Communities (Attachment) from project-related impacts. The Department considers these communities as threatened habitats having both regional and local significance.

7. The DEIR should include mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.

8. For proposed preservation and/or restoration, the DEIR should include measures to perpetually protect the targeted habitat values from direct and indirect negative impacts. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.

9. In order to avoid impacts to nesting birds, the DEIR should require that clearing of vegetation, and when biologically warranted construction, occur outside of the peak avian breeding season which generally runs from February 1 through September 1 (as early as January for some raptors). If project construction is necessary during the bird breeding season a qualified biologist with experience in conducting bird breeding surveys should conduct weekly bird surveys for nesting birds, within three days prior to the work in the area, and ensure no nesting birds in the project area would be impacted by the project. If an active nest is identified, a buffer shall be established between the construction activities and the nest so that nesting activities are not interrupted. The buffer shall be a minimum width of 300 feet (500 feet for raptors), shall be delineated by temporary fencing, and shall remain in effect as long as construction is occurring or until the nest is no longer active. No project construction shall occur within the fenced nest zone until the young have fledged, are no longer being fed by the parents, have left the nest, and will no longer be impacted by the project.

10. The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species. Studies have shown that these efforts are experimental in nature and largely unsuccessful.

11. Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.

We appreciate the opportunity to comment on the above referenced NOP. Questions regarding this letter and further coordination on these issues should be directed to Kyle Dutro at (858) 467-4267 or kdutro@dfg.ca.gov.

Sincerely,

Stephen M. Juarez
Environmental Program Manager
South Coast Region

Enclosure
Sensitivity of Top Priority Rare Natural Communities in Southern California

cc: State Clearinghouse, Sacramento

Sensitivity of Top Priority Rare Natural Communities in Southern California

Sensitivity rankings are determined by the Department of Fish and Game, California Natural Diversity Data Base and based on either number of known occurrences (locations) and/or amount of habitat remaining (acreage). The three rankings used for these top priority rare natural communities are as follows:

S1.# Fewer than 6 known locations and/or on fewer than 2,000 acres of habitat remaining.

S2.# Occurs in 6-20 known locations and/or 2,000-10,000 acres of habitat remaining.

S3.# Occurs in 21-100-known locations and/or 10,000-50,000 acres of habitat remaining.

The number to the right of the decimal point after the ranking refers to the degree of threat posed to that natural community regardless of the ranking. For example:

S1.1 = very threatened
S2.2 = threatened
S3.3 = no current threats known

Sensitivity Rankings (February 1992)

Rank	Community Name
S1.1	Mojave Riparian Forest
	Sonoran Cottonwood Willow Riparian
	Mesquite Bosque
	Elephant Tree Woodland
	Crucifixion Thorn Woodland
	Allthorn Woodland
	Arizonan Woodland
	Southern California Walnut Forest
	Mainland Cherry Forest
	Southern Bishop Pine Forest
	Torrey Pine Forest
	Desert Mountain White Fir Forest
	Southern Dune Scrub
	Southern Coastal Bluff Scrub
	Maritime Succulent Scrub
	Riversidean Alluvial Fan Sage Scrub
	Southern Maritime Chaparral
	Valley Needlegrass Grassland
	Great Basin Grassland
	Mojave Desert Grassland
	Pebble Plains
	Southern Sedge Bog
	Cismontane Alkali Marsh

S1.2	Southern Foredunes
	Mono Pumice Flat
	Southern Interior Basalt Flow Vernal Pool
S2.1	Venturan Coastal Sage Scrub
	Diegan Coastal Sage Scrub
	Riversidean Upland Coastal Sage Scrub
	Riversidean Desert Sage Scrub
	Sagebrush Steppe
	Desert Sink Scrub
	Mafic Southern Mixed Chaparral
	San Diego Mesa Hardpan Vernal Pool
	San Diego Mesa Claypan Vernal Pool
	Alkali Meadow
	Southern Coastal Salt Marsh
	Coastal Brackish Marsh
	Transmontane Alkali Marsh
	Coastal and Valley Freshwater Marsh
	Southern Arroyo Willow Riparian Forest
	Southern Willow Scrub
	Modoc-Great Basin Cottonwood Willow Riparian
	Modoc-Great Basin Riparian Scrub
	Mojave Desert Wash Scrub
	Engelmann Oak Woodland
	Open Engelmann Oak Woodland
	Closed Engelmann Oak Woodland
	Island Oak Woodland
	California Walnut Woodland
	Island Ironwood Forest
	Island Cherry Forest
	Southern Interior Cypress Forest
	Bigcone Spruce-Canyon Oak Forest
S2.2	Active Coastal Dunes
	Active Desert Dunes
	Stabilized and Partially Stabilized Desert Dunes
	Stabilized and Partially Stabilized Desert Sandfield
	Mojave Mixed Steppe
	Transmontane Freshwater Marsh
	Coulter Pine Forest
	Southern California Fellfield
	White Mountains Fellfield
S2.3	Bristlecone Pine Forest
	Limber Pine Forest

Otay Water District WWMP SPEIR Agency Comments

Agency	Date	Comment(s)	Addressed in EIR Chapter
State Water Resources Control Board	July 27, 2012	(Potential) Additional Environmental Review for Clean Water State Revolving Fund (CWSRF) = "CEQA Plus," Section 7 surveys, and Section 106 Report.	The project does not anticipate at this time to use the Clean Water State Revolving Fund for the 2012 WRMP Update, if these funds are needed for individual projects additional environmental review comments will be implemented as needed.
California Department of Fish and Game	August 17, 2012	1. DEIR should address how the WWMP relates to any approved Natural Community Conservation Planning (NCCP) Subarea Plans (City of SD, SD County, City of Chula Vista) and OWD's draft SAP. 2. Even though this will be a Program EIR, the Department recommends as much specificity as possible. Identify and quantify any direct, indirect, or cumulative impacts to sensitive species/habitats associated with each alternative, as well as identifying mitigation. 3. The Department opposes development or conversion of wetlands unless project mitigation assures "no net loss" of wetlands habitat values or acreage. If impacts to mature wetlands would occur, mitigation measures to reduce impacts must be included in DEIR. a. A jurisdictional delineation would be required if project area	Biological impacts have been addressed in Section 4.2 Biological Resources

		supports aquatic, riparian, and wetland habitats. b. If project will divert or obstruct, change the bed, channel or bank of a river or stream, then applicant must give notice to Department pursuant to section 1600 et seq. of Fish and Game Code. This may require a Lake and Streambed Alteration Agreement (LSA), subject to CEQA compliance. 4. If the project would result in the taking of a CESA species, then consultation with the Department is required. Issuance of an incidental take permit (ITP) may be required. The CEQA document should have sufficient and detailed biological mitigation monitoring and reporting procedures to satisfy the requirements for a CESA ITP. *may not apply once OWD's NCCP SAP is approve* 5. The DEIR should include an assessment and inventory of rare plants and communities, biological resources, and all rare, threatened and endangered species within he project's area of potential effect. Focused species-specific surveys would be required. 6. Proper analysis of potential project-related impacts to Bio. Resources (see letter for specifics). 7. Proper mitigation for potential project-related Bio. Impacts (see letter for specifics).	

California Department of Toxic Substances Control	August 14, 2012	1. The SPEIR should evaluate whether conditions within the Project area would pose a threat to human health or the environment. A regulatory agency database list was provided for research. 2. The SPEIR should address how any site investigations/remediation would be initiated if a site was contaminated. 3. Any site investigations, sampling, or remediation will be under agency oversight and then any findings should be included in the document. 4. Proper demolition, soil excavation would be followed with agency oversight.	Impacts associated with public health and safety have been addressed in Section 4.10 Public Safety
California Native American Heritage Commission	July 24, 2012	1. The lead agency is required to assess whether the project will have an adverse impact on historical / archeological resources within the area of potential effect (APE), and if so, mitigate those impacts. 2. The NAHC recommends that the lead agency request that the NAHC do a Sacred Lands File search as part of project planning. 3. The NAHC urges the lead agency to make contact with the tribes on the Native American Contacts list provided.	Impacts associated with cultural resources have been addressed in Section 4.3 Cultural

Otay Water District WWMP SPEIR Non-Agency Comments

Non-Agency	Date	Comment(s)	Addressed in EIR Chapter
Valle de Oro Community Planning Group	August 2, 2012	1. SANDAG forecasts have been found to contain significant errors and unsupportable comments. 2. Three of the four alternatives involve possible expansion of the Rancho San Diego Pump Station with no mention of growth-induced mitigation required prior to its construction and operation. 3. Decommissioning the wastewater recycling facility may shift significant wastewater flows to the Rancho San Diego Pump Station located in a U.S. Wildlife Refuge and adjacent to a highly sensitive riparian-woodland habitat. 4. Possible doubling of the wastewater recycling facility capacity located in a highly sensitive habitat area of the U.S. Wildlife Refuge could result in significant impacts to sensitive biological resources. In addition, the handling/treating of solid waste onsite probably requires further expansion of the facility footprint and worsens the direct impacts to sensitive biological resources. Impacts to humans and wildlife may also occur due to noxious odors inherent in processing such solid waste and possible contamination of the Sweetwater riparian floodplain or upland habitat areas. 5. Possible tripling of the wastewater recycling facility capacity located in a	1. The OWD falls entirely within the local regulatory jurisdiction of SANDAG. Local Regulatory Framework is addressed in Section 4.0 2. Impacts associated with construction have been addressed in Section 4.8 Land Use and Planning 3. Biological impacts have been addressed in Section 4.2 Biological Resources 4. Biological impacts have been addressed in Section 4.2 Biological Resources. Water Quality impacts have been addressed in Section 4.6 Hydrology and Water Quality. Public Safety impacts have been addressed in Section 4.10 Public Safety.

			highly sensitive habitat area of the U.S. Wildlife Refuge could result in significant impacts to sensitive biological resources. In addition, the handling/treating of solid waste onsite probably requires further expansion of the facility footprint and worsens the direct impacts to sensitive biological resources. Impacts to humans and wildlife may also occur due to noxious odors inherent in processing such solid waste and possible contamination of the Sweetwater riparian floodplain or upland habitat areas. Expansion to accept wastewater from other service areas coupled with use of the Rancho San Diego Pump Station for added capacity would project growth-induced urban sewer infrastructure into the County's rural land-use areas.	5. Biological impacts have been addressed in Section 4.2 Biological Resources. Water Quality impacts have been addressed in Section 4.6 Hydrology and Water Quality. Land use and construction impacts have been addressed in Section 4.8 Land Use and Planning. Public Safety impacts have been addressed in Section 4.10 Public Safety.