CITY OF VISTA

STORMWATER CONVEYANCE SYSTEM MAINTENANCE PROJECT
FINAL MITIGATED NEGATIVE DECLARATION

SCH NO. 2008021127

ADDENDUM NO. 1

Prepared for:

City of Vista
200 Civic Center Drive
Vista, California 92084
Contact: Jon Nottage

Prepared by:

AECOM
401 West A Street, Suite 1200
San Diego, California 92101
Phone: (619) 610-7600
Contact: Paula Jacks

October 2020

TABLE OF CONTENTS

LIST OF TABLES

SECTION 1 INTRODUCTION

The City of Vista (City) prepared and adopted a Final Mitigated Negative Declaration (MND) for their Stormwater Conveyance System Maintenance Project (currently known as the City's Channel Maintenance Program but referred to herein as Project for consistency with the MND) in 2008 (SCH Number [No.] 2008021127, referred to herein as the 2008 MND). The Project includes on-going maintenance activities to remove debris, dirt sediment, and vegetation to maintain adequate flow and flood control at designated locations (sites) in stormwater facilities (inlets, outlets, basins) or drainages (creeks or unnamed tributaries) that are a part of the City's Municipal Separate Storm Sewer System in accordance with environmental regulations. These activities also serve to reduce pollutants that collect in tributaries due to stormwater runoff. While conducting channel maintenance activities, the City employs best management practices (BMPs) to protect biological resources within and adjacent to maintenance areas and reduce water quality impacts. The City has implemented the Project from 2009 through early 2019.

The Project and associated 2008 MND fulfilled the requirements for issuance to the City of maintenance authorizations under Section 401 and 404 of the Clean Water Act (CWA) and Section 1602 of the California Fish and Game Code. The Project provides a streamlined approach to permitting with the U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and California Department of Fish and Wildlife (CDFW), specifying various reporting, compliance, and mitigation processes when undertaking the described maintenance activities. A Regional General Permit (RGP) (SPL-2008-00974-MBS) was issued by USACE in January 2010, a Water Quality Certification (WQC) with Waste Discharge Requirements (No. 08C-068) was issued by RWQCB in March 2009, and a Lake and Streambed Alteration Agreement (LSAA) (Notification No. 1600-2008-0348-R5) was issued by CDFW in March 2009. Table 1 lists these original Project authorizations, subsequent amendments and renewals, and the number of sites authorized for maintenance.

Table 1. City of Vista Stormwater Conveyance System Maintenance Project Authorizations

Regulating Agency	Permit	Issued	Extended/ Renewed	Expiration	Sites Authorized
U.S. Army Corps of Engineers	Regional General Permit 86 SPL-2014-00733-MBS[1]	January 2010	Reissued January 2015	January 20, 2020	32
Regional Water Quality Control Board	Water Quality Certification 08C-068	March 2009	Amended March 2014	March 26, 2019	33
California Department of Fish and Wildlife	Streambed Alteration Agreement 1600-2008-0348-R5[2]	March 2009[2]	Extended February 2014	December 31, 2018	47 (35 + 2 + 10)

[1] RGP 86 originally issued with File No. SPL-2008-00974-MBS
[2] Amended in November 2009 to add two sites, and again in March 2012 to add ten sites and modify one.

The 2008 MND was prepared to provide compliance with the California Environmental Quality Act (CEQA) for actions related to the Project. It considers the environmental impacts of adopting the Project

and obtaining associated permits from RWQCB and CDFW that authorize impacts during implementation of activities identified in the Project. The 2008 MND provides an analysis of the Project's environmental impacts.

The 2008 MND discusses 32 channel maintenance sites. However, by the time the original permits were issued (2009 and 2010), USACE, RWQCB, and CDFW each authorized 32, 33, and 35 sites, respectively. Moreover, additional sites were amended to the LSAA in 2009 and 2012, increasing the number of sites authorized under the LSAA to 47. One site was modified, increasing the maintenance area. In the amendment requests to CDFW (dated March 5, 2012) and to USACE and RWQCB (dated March 6, 2012), proposed work at the most of new sites was described as not generating substantive impacts when conducted in accordance with governing conditions of the existing permits. Net improvements in drainage hydraulic function and habitat quality were also cited. Where sites would result in impacts to wetland habitats (three sites), mitigation based on impact acreage and ratios established in the original permits and MND was provided through the Guajome Creek Preserve Area and accounted for in annual reporting for this mitigation site. A list of the sites authorized by the issued permits and amendments is provided in Attachment 1.

After the original authorizations expired, the City sought renewals (i.e., reissuance of RGP 86, an amendment to the Section 401 authorization, and an extension to the LSAA) to continue implementing the Project. These were applied for and granted in 2014 and 2015. The City's renewed authorizations expired in early 2019. To continue conducting ongoing maintenance activities pursuant to the Project, the City has requested reissuance of the authorizations from RWQCB and CDFW (applications submitted May 2020 and June 2020, respectively). The renewals would authorize the same types of maintenance activities as previously authorized and would apply to the majority of the original stormwater channel locations authorized in 2009 and 2014. Attachment 1 and Section 2.3.1 identify and discuss sites to be removed from the Project. In addition, seven new stormwater channel locations are currently proposed for inclusion.[1]

The RWQCB's and CDFW's actions in issuing the authorizations are subject to CEQA, and the City requested the preparation of this addendum (Addendum No. 1) to the 2008 MND in accordance with State CEQA Guidelines Section 15164, to explain that appropriate CEQA coverage for issuing the authorizations is provided by the 2008 MND, and that an additional public CEQA document is not necessary. This addendum discusses the Project changes, considers the environmental impacts of the revised Project, and documents the reasoning for concluding that the changes would not result in new significant environmental impacts that were not identified in the 2008 MND, or result in substantial increases in significant impacts that were identified in the 2008 MND. The RWQCB's and CDFW's authorizations would not be subject to National Environmental Policy Act (NEPA), as neither USACE nor any other federal agency needs to take action to approve the authorization.

[1] The City has also requested reissuance of their RGP from USACE pursuant to CWA Section 404. The City understands USACE will prepare its own federally required environmental documentation for the reissuance.

SECTION 2 PROJECT DESCRIPTION

2.1 Project Addressed in 2008 MND

Chapter 2 of the 2008 MND provides a description of the Project, its maintenance activities, and maintenance locations. In summary, the City's Department of Public Works (DPW) conducts inspections at least annually, more frequently where site-specific conditions warrant, and at key locations following major storm events. Maintenance activities are conducted based on the results of these inspections and are undertaken where needs are identified. Where activities are not required, no maintenance work is conducted. All of the maintenance work is performed by DPW, and applicable construction standards are incorporated into all work orders.

The size of the maintenance crew ranges from two to six people, and the time involved at each maintenance site to complete the work ranges from half a day to several weeks. Pursuant to the City's noise abatement criteria, all work is limited to Monday through Saturday between the hours of 7:00 a.m. and 7:00 p.m. In addition, all work is performed in the presence and supervision of the City's biological monitor, who has the authority to direct all work and implement additional measures, if necessary, to avoid significant impacts on biological resources. The maintenance work involves the intermittent use of a backhoe, dump truck, excavator, mechanical pumps, and/or smaller mechanical equipment. Maintenance work is performed outside of the rainy season to the extent feasible, which typically occurs from October 1 through April 30. Table 2-1 of the 2008 MND describes each maintenance site including the location, site description (i.e., existing environmental setting and surrounding land uses), description of the proposed maintenance activities, and the proposed schedule of maintenance. Table 2-2 of the 2008 MND summarizes the construction standards that are incorporated and performed under all work orders to reduce environmental effects.

The 2008 Program area covered 32 sites where maintenance activities occur. The maintenance sites are situated along various points of Buena Vista Creek, and unnamed tributaries to Buena Vista Creek, Guajome Wetlands (a tributary to Guajome Lake and San Luis Rey River), and the Brengle Terrace Park Detention Basin. A majority of the sites are located within the City while others are located in the County (Sites 1 through 4, 6, and 19). The 2008 MND notes that approximately 0.30 acres (905 linear feet) of federal and state jurisdictional habitat and approximately 0.15 acres (1,040 linear feet) of state-only jurisdictional habitat was estimated to be permanently impacted as a result of the maintenance activities identified within the Project. Mitigation specified in the 2008 MND (BR-1 and BR-2 as defined below) in addition to implementation of conservation measures and standard construction measures (see Table 2-2 of the 2008 MND and Table 9 of the BRR) would be conducted to compensate for this loss of habitat. Additional sites were ultimately authorized by RWQCB (33 sites total) and CDFW (47 sites total) in their initial authorizations and in subsequent amendments agreed to by CDFW. Attachment 1 includes a list of the sites and total impacts originally authorized.

Mitigation Measure BR-1

General Protection Measure

General protection measures would apply to all of the proposed maintenance activities described in Table 2-1 in the Project Description of the 2008 MND, and shall include, but not be limited to, the following:

1. All limits of construction shall be fenced with silt barriers to prevent the spread of silt from culvert maintenance activities into adjacent waters.
2. Erosion control measures shall be put in place where soils become exposed.
3. All equipment will be checked daily for leaks and spills, and those in need of repair due to leaks, corrosion, and/or deterioration would be replaced.
4. All vegetative debris would be properly disposed of by composting or at a permitted landfill and would not be dumped into waterways or storm drainage systems.
5. Access to maintenance sites would be via existing roads and access ramps. Where access to maintenance sites has the potential to impact surrounding vegetation, the least impactive route would be chosen.

Mitigation Measure BR-2

Special Protection Measures

Special protection measures are those that would occur at a specific maintenance site, as noted below.

1. In the case that performing maintenance activities in an inundated, flowing drainage cannot be avoided, the temporary diversion of water may be necessary. This diversion would be via barriers, such as sandbags or a temporary culvert.
2. Nesting bird surveys shall be completed by the City's Biological Monitor prior to vegetation removal if vegetation removal occurs in the period from February 15 to September 30.
3. In the event that more than 90 percent of the vegetation is removed from an area greater than 30 feet in diameter, the site shall be replanted with native species as determined by the City's Biological Monitor.
4. Impacts to giant reed (*Arundo donax*) shall occur in the form of cutting down the stalks and spraying the areas cut with an environmentally safe glyphosate herbicide (*Rodeo*). The root system or root-mat of giant reed will not be physically disturbed (i.e., broken, fragmented, upturned, unburied, etc.) or exposed in such a way as to spread this species.

2.1.1 Authorized Maintenance Activities

The authorized maintenance activities are listed and described in Table 2-1 of the 2008 MND. Each of the agency approvals, including the original authorizations in 2009 and 2010, the amendments issued in November 2009 and March 2012, and the permit renewals issued in 2014 and 2015, are listed and describe the proposed maintenance activities. Consistent with those authorizations and approvals, the City maintenance activities include removing debris, dirt sediment, and vegetation to maintain adequate flow and flood control in stormwater channels thereby reducing high pollutant concentrations during the first flush of storms, preventing clogging downstream, restoring sediment trapping capacity, and avoiding flooding. Channel maintenance activities may involve the intermittent use of a backhoe, dump truck, excavator, mechanical pumps, and/or the intermittent use of smaller mechanical equipment. The majority of activities occur in developed and disturbed areas, or other areas lacking non-sensitive habitat areas.

Table 2-1 of the 2008 MND describes in detail the various maintenance activities, as broken down into the following categories:

- Vegetation and/or tree trimming and removal,
- Sediment removal,
- Minor re-grading and/or excavations, and
- Placement and/or minor repair of riprap or asphalt.

Depending on the maintenance site location, work varies from only requiring hand-removal of vegetation and/or trees or hand-shoveling of sediment to needing mechanical equipment such as a backhoe. The specific work area limits and equipment required for each activity at each site are further detailed in Table 2-1 of the 2008 MND. Authorized impacts for the activities by location are detailed in Table BR-2 of the 2008 MND.

2.1.2 Standard Construction Measures and Mitigation Measures

The 2008 MND determined that the maintenance activities have the potential to impact sensitive habitats and species, as reflected in Section IV, Biological Resources. The 2008 MND discusses standard construction measures (Table 2-2 of the 2008 MND) that are required to be implemented when conducting all maintenance activities to reduce effects on biological and water resources. The 2008 MND also discusses the mitigation measures that apply to all maintenance activities (Mitigation Measure BR-1, General Protection Measures; see Section 2.1 above) and the mitigation measures that apply to specific maintenance sites (Mitigation Measure BR-2, Special Protection Measures; see Section 2.1 above).

2.1.3 Mitigation for Impacts

When a maintenance activity results in permanent impacts, the mitigation approach is habitat-based. The original RWQCB and CDFW authorizations required mitigation for permanent impacts through

restoration/enhancement at a 2:1 ratio (for a total of 0.90 acres). Mitigation was prescribed to occur off-site within Guajome Creek, pursuant to the Conceptual Wetland Mitigation Plan prepared for the Project dated March 17, 2009 and occur within the first year following impacts. As previously noted, the 2012 permit amendment described mitigation for wetland impacts at three of the then proposed new sites based on impact acreage and ratios established in the original permits that was provided through the Guajome Creek Preserve Area and accounted for in annual reporting. The City successfully completed mitigation for the channel sites authorized via the original and amended permits.

2.2 RWQCB Permitting Responsibility

Activities that discharge dredge or fill material into wetland and non-wetland waters regulated by the CWA are required to obtain a CWA Section 401 WQC from RWQCB.[2] In addition to the CWA, the California Porter-Cologne Water Quality Control Act requires projects that affect state jurisdictional wetlands or non-wetland waters to obtain Waste Discharge Requirements (WDRs) from the relevant RWQCB. State jurisdiction under this law applies to all wetlands and non-wetland waters that are regulated by the CWA, as well as isolated wetlands and waters that are not regulated by the CWA.

2.3 CDFW Permitting Responsibility

Pursuant to the California Fish and Game Code Section 1602 and Section 1603, CDFW regulates activities that would "substantially divert or obstruct the natural flow of any river, stream, or lake"; "substantially change or use any material from the bed, channel, or bank of any river, stream, or lake"; or "deposit debris, waste, or other materials that could pass into any river, stream, or lake." Activities meeting these criteria are required to submit an application (notification) and typically obtain a LSAA from CDFW. A LSAA is required when it is determined that a proposed activity may substantially adversely affect existing fish or wildlife resources and includes measures necessary to protect existing fish and wildlife resources. CDFW jurisdiction under this law applies to all perennial, intermittent, and ephemeral rivers, streams, and lakes in the state. As noted above in Section 1, CDFW may issue different types of LSAAs, one of which pertains to routine maintenance activities.

2.4 Proposed Changes in the Project

This addendum has been prepared to address the City's application for and prospective reissuance of RWQCB and CDFW authorizations to allow for continued maintenance at 35 of the previously permitted maintenance activity sites and additional maintenance at seven new maintenance activity sites. The revised Project does not propose any changes in work activities than those described and analyzed in the 2008

[2] Activities that discharge, dredge, or fill material into wetland and non-wetland waters regulated by CWA are also required to obtain a CWA Section 404 permit from USACE if the waters are determined to be under federal jurisdiction. The City has applied for reissuance of their previous RGP pursuant to CWA Section 404; however, this reissuance is not further discussed, as it is not required to comply with CEQA. As noted previously, the City understands USACE will prepare its own federally required environmental documentation for the RGP reissuance.

MND. Rather, this addendum has been prepared to consider the environmental impacts of the additional authorization of impacts that would occur at the seven new maintenance activity sites via reissuance of RWQCB and CDFW authorizations. Reissuance of the existing authorizations is a CEQA discretionary action of RWQCB and CDFW, making them responsible agencies pursuant to CEQA.

2.4.1 Proposed Reissuance

To support authorization reissuance, the City re-evaluated and updated its site-specific maintenance needs. During this process, some sites were removed from the revised Program. The City now proposes to continue maintenance activities at 35 of the sites that have been maintained since 2009, and to conduct maintenance activities at seven new sites where the need for routine maintenance has been identified. Among these sites, the activities fall into five categories:

1. No work within the channel,
2. Handwork only within channels,
3. Handwork only within channels plus excavation using equipment staged at the top of the bank,
4. Mechanical excavation using equipment within concrete channels, and
5. Mechanical excavation using equipment within earthen channels.

A description of the maintenance work per category is provided below. Table 2 provides a summary of whether the work would be under the jurisdiction of RWQCB, CDFW, or both. Attachment 2 provides a list of the 42 sites among these five categories and includes additional details related to the maintenance activities (note, the list shows the seven new sites highlighted in orange in the Site Identification [ID] column).

Table 2. Regulatory Jurisdiction by Activity

Within Channel Activity	Outside Channel Activity	RWQCB Jurisdiction	CDFW Jurisdiction
No work within channel	Handwork only	Not regulated	Not regulated
Handwork only within channel	No work from top of bank	Not regulated	Not regulated
Handwork only within channel	Excavation from top of bank	Regulated (requires WDRs)	Regulated (requires Maintenance Agreement)
Equipment within concrete channels	May include excavation from top of bank	Regulated (requires WQC)	Regulated (requires Maintenance Agreement)
Equipment within earthen channels	May include excavation from top of bank	Regulated (requires WQC)	Regulated (requires Maintenance Agreement)

Channel maintenance work is conducted under dry conditions to the extent feasible. When water is present, methods to facilitate clean excavation include the use of silt fencing and trash nets to contain silt, trash, and debris within the maintenance area and prevent redistribution of materials into downstream areas.

Attachment 3 contains the BMP Manual with additional measures employed to protect surface waters during maintenance activities. Sites that typically have some water present are noted in Attachment 2. Although water may be present, DPW does not use instream diversion for channel maintenance; other than the removal of matter that inhibits water flow, the waterbody is not altered.

No Work within Channel

At one site (see Table 3), the City proposes to continue to trim vegetation that grows beyond a property fence line along a roadway. This site is adjacent to an unnamed tributary. Vegetation overgrowth that develops between the fence line and the K-rail adjacent to the road is trimmed, as needed, including branches of the riparian canopy. No access into the adjacent channel is necessary. Vegetation that is removed is taken to a secondary yard for proper disposal.

Table 3. Channel Activity by Site

Channel Activity	Site Number
No work within the channel	7
Handwork only within channels	4, 5, 11, 27, 32A, 33, 35, 38, 41, **52, 53, 54**
Handwork only within channels plus excavation using equipment staged at the top of the bank	1, 2, 3, 6, 10, 13 ,14, 16, 17 ,18, 19, 22, 25, 26, 31, 32B, 42, 43, 47
Mechanical excavation using equipment within concrete channels	30, **48, 49, 50, 51**
Mechanical excavation using equipment within earthen channels	8, 15, 21, 45, 46

*****Site numbers in **bold** were not included in previous authorizations

Handwork Only within Channel

At 12 sites (see Table 3), the City proposes to remove vegetation, debris, and sediment, where needed, by manual means (e.g., shovels, chainsaws, pole saws, weed whips and cutting heads, axes, loppers, and other hand- held tools) to manage accumulated material and overgrowth vegetation that inhibits stormwater flow. Routine maintenance has been conducted at nine of these 12 sites since 2009. The City has identified three new sites (Sites 52, 53, and 54) where handwork only would be used within the channel to clear the overgrowth of live vegetation, remove excessive urban debris, and remove dead vegetation to increase visibility into the area for public safety. Where overgrowth of live vegetation is trimmed, the root system would be left intact. Initial handwork at the three new sites to remove larger materials (dead vegetation and debris) and trim overgrowth would include hand tools such as loppers, hand saws, and chainsaws. No sediment removal is proposed for the three new sites. Thereafter, routine maintenance would be conducted as needed. This type of handwork maintenance may be conducted on a yearly basis, depending on site conditions. All access within the channel is on foot.

For all sites, methods to facilitate clean excavation with no or minimal redistribution of silt, debris, and trash into the channel would include the use of silt fencing and trash nets, where needed. Removed sediment, vegetation, and debris would be taken to a secondary yard for proper disposal.

Handwork Only within Channel, Mechanical Excavation Using Equipment Staged Top of Bank

At 19 sites (see Table 3), the City proposes to stage an excavator, vacuum truck, or backhoe adjacent to the site (i.e., at the top of the bank adjacent to the channel inlet/outlet, stormwater basin, or bridge), and remove accumulated sediment, vegetation, and debris by one of these mechanical means. This type of excavation maintenance has been conducted at these 19 sites since 2009. Using the vacuum truck, basins and inlets/outlets would also be cleaned by jet spraying or roddering. At these sites, equipment would be staged outside of the top of bank, and the use of large equipment within the channel itself would be avoided. This type of maintenance would be required approximately every 2 years. As needed, handwork within the channel or basin would also be conducted.

Where maintenance is conducted, the City staff implement BMPs such as erosion control, sediment control, and material and waste control, as needed. Removed sediment and vegetation are disposed of properly. Additionally, orange cones and flagging tape are placed around sites to identify work limits.

As noted above, for all sites, the City would use silt fencing, trash nets, or other methods described in the City's BMP Manual (Attachment 3) to facilitate clean excavation with no or minimal redistribution of silt, debris, and trash into the channel. No instream diversion or alteration of the water body is necessary for the proposed channel maintenance. Removed sediment, vegetation, and debris would be taken to a secondary yard to dry out, and then disposed of properly.

Mechanical Excavation Using Equipment within Concrete and Earthen Channels

At 10 sites, including five concrete channels and five earthen channels (see Table 3), the City proposes to use heavy equipment (backhoe, bobcat, and compact loaders) within the channels to remove accumulated matter that restricts proper stormwater drainage. This type of maintenance has been conducted at the five earthen channel sites and at one of the concrete channel sites since 2009. The other four concrete channel sites are proposed new sites (Sites 48 through 51) where the City has identified the need for sediment and debris removal; no vegetation occurs within these concrete channels. Sediment, debris, and vegetation removal is needed in the five earthen channels. Maintenance is required at each of these sites approximately every 2 years. At most of these sites (except Site 49), the City would also use an excavator, vacuum truck, or backhoe staged adjacent to the site to aid in the removal of accumulated matter.

As noted above, where maintenance is conducted, the City staff implement BMPs such as erosion control, sediment control, and material and waste control, as needed. Removed sediment and vegetation are disposed of properly. Additionally, orange cones and flagging tape are placed around sites to identify work limits.

Also as noted above, for all sites, the City would use silt fencing, trash nets, or other methods described in the City's BMP Manual (Attachment 3) to facilitate clean excavation with no or minimal redistribution of silt, debris, and trash into the channel. Removed sediment, vegetation, and debris are taken to a secondary yard to dry out, and then disposed of properly.

The revised Program and proposed reissuance of authorizations would maintain and expand upon the process by which RWQCB and CDFW review and authorize the City to carry out the identified maintenance activities, and require the City to implement certain conditions when that work is conducted (i.e., conditions that are anticipated to be the same or similar as those listed in the 2008 MND and the BMP Manual [Attachment 3 of this addendum]). The City would continue to notify RWQCB and CDFW of planned maintenance activities pursuant to the timeframes established in the prior authorizations, as amended by the proposed renewed authorizations. As described in the BMP Manual, the City is required to track and report on all maintenance activities. Further, the City intends to expand the data input process to develop a more comprehensive database to streamline Project evaluation and reporting. The City is also required to document activities annually to RWQCB and CDFW and would continue to do so under the proposed reissuances.

2.4.2 New Maintenance Sites Proposed for Coverage

In summary, four of the seven new maintenance activity sites proposed for coverage would occur within concrete channels (Sites 48 through 51). As described above and shown in Attachment 2, both handwork and equipment use would be required for these sites and would occur every 2 years. The remaining three new maintenance activity sites proposed for coverage would occur within earthen channels (Sites 52 through 54). As described above and shown in Attachment 2, no equipment use would occur within the channel. Only handwork would occur at these sites, and it would occur no less than every 3 or more years.

The potential for biological and aquatic resources at all 42 sites proposed for coverage, including the seven new sites, was evaluated in a Biological Resources Report (BRR) and an Aquatic Resources Delineation Report (ARDR). The BRR is included as Attachment 4 to this addendum, and the ARDR is included as Attachment 5 to this addendum. These resources are summarized below.

Biological Resources

Based on field assessments and desktop review, vegetation communities were mapped and the potential for special status plant and wildlife species to occur was documented within the study area (defined as the maintenance sites plus a 100-foot buffer surrounding the sites). As summarized in Table 4, the maintenance limits among all sites encompass a total of 11.90 acres of riparian and wetland communities and 2.27 acres of uplands. The predominant cover types within maintenance limits are non-native woodland, followed by disturbed wetland, and urban/developed. Among all sites, the 100-foot buffers encompass approximately 14.39 acres of riparian and wetland communities and 74.13 acres of uplands. The majority (78 percent) of the buffer area is characterized as urban/developed. Table 4 also assigns a corresponding Multiple Habitat

Conservation Program (MHCP) group classification for each vegetation community or other cover type. Table 4 below includes the specific vegetation communities and other cover types and corresponding acreages that were mapped at each maintenance site and the surrounding buffer.

Table 4. Vegetation Communities and Other Cover Types within the Study Area

Vegetation Communities and Other Cover Types	MHCP Group	Maintenance Limits (acres)	100-foot Buffer (acres)
Wetland and Riparian			
Disturbed Wetland	A	2.58	2.52
Coastal and Valley Freshwater Marsh	A	<0.005	0.20
Southern Riparian Forest	A	0.01	0.09
Southern Arroyo Willow Riparian Forest	A	0.35	0.66
Non-native Riparian	A	0.05	1.18
Arundo-dominated Riparian	A	-	0.02
Coast Live Oak Woodland	B	0.98	1.71
Non-native Woodland	F	7.48	7.36
Eucalyptus Woodland	F	0.45	0.65
Subtotal Wetland and Riparian		*11.90*	*14.39*
Upland			
Disturbed Habitat	F	0.08	4.33
Urban/Developed	F	2.18	68.78
Diegan Coastal Sage Scrub	C	-	1.02
Subtotal Upland		*2.27*	*74.13*
TOTAL		**14.16**	**88.52**

Source: BRR (Attachment 4)

The BRR also determined the potential for special status plant and wildlife species to occur within the maintenance sites. Special status species are those protected under the federal Endangered Species Act, California Endangered Species Act, and/or listed as sensitive by other state and local organizations or agencies such as the California Native Plant Society. For purposes of this analysis, a special status species is broadly defined as a listed, candidate, sensitive, or other species covered by local or regional plans (including the MHCP), policies, or regulations, or by CDFW or United States Fish and Wildlife Service. The BRR concluded that 17 special status plant species and 21 special status wildlife species have the potential to occur within the study area.

For plants, the potential for special status plant species to occur at each site was assessed during the vegetation mapping surveys conducted in 2019 and 2020. The BRR determined that no habitat suitable to support special status plant species was present within the maintenance sites themselves. Populations of two sensitive plant species, San Diego sagewort (*Artemisia palmeri*) and San Diego marsh-elder (*Iva hayesiana*), have been recorded in the 100-foot buffer of one site (Site 47). In addition to these known occurrences, it was determined that habitats potentially suitable to support two federally listed plants, San Diego thorn- mint (*Acanthomintha ilicifolia*) and San Diego ambrosia (*Ambrosia pumila*), and two plants of lower sensitivity status, California adolphia (*Adolphia californica*) and Parry's tetracoccus (*Tetracoccus*

dioicus), are present within the 100-foot buffers of three sites (Sites 30, 47, and 53). Both the 2020 BRR and the 2020 BMP Manual prescribe implementation of general and special conservation measures to avoid and minimize potential impacts to special status plant species; these measures are provided in Table 5 below. By implementing the conservation measures noted in Table 5, the City will avoid and minimize potential impacts to special status plant species. For the remaining 11 special status plant species considered to have some potential to occur within the study area, it was determined that no habitat suitable to support these species is present within the study area.

Table 5. Conservation Measures for Biological Resources

Prior to Maintenance Activities	
Environmental Compliance Readiness	Designate a qualified biologist(s)[1] and/or environmental monitor(s)[2], as applicable, to oversee compliance with protective measures for the biological resources. When a biologist/monitor is required, the monitor will maintain communications with the appropriate City of Vista (City) personnel to ensure that issues relating to biological resources are appropriately and lawfully managed. The biologist/monitor will prepare daily logs to document compliance with these measures. A compilation of these logs will be included in annual reporting required by the permits.
Worker Awareness	Each City employee that conducts channel maintenance will participate in a training/awareness program that will be presented by the qualified biologist, prior to working on the proposed project.
During Maintenance Activities – General	
Light and Glare	Conduct maintenance activities during normal business hours, and without the use of lighting whenever possible, excepting emergencies. If emergency maintenance activities occur at night, all project lighting (e.g., staging areas, equipment storage sites, roadway) will be directed onto the roadway or maintenance facility footprint and away from sensitive habitat. Light glare shields may also be used to reduce the extent of illumination.
Flagging and Fencing	Delineate work limits (including staging areas and access routes) with flagging or cones, or, if needed, with temporary fencing and silt barriers to prevent unauthorized habitat impacts outside of designated maintenance limits and the spread of silt from the work area into adjacent habitats. When needed, install the fencing in a manner that does not impact habitats. If used, remove temporary construction fencing upon project completion.
Riparian Area Trespass	Avoid unnecessary or unauthorized trespass by workers and equipment, staging and storage of equipment and materials, refueling activities, and littering or dumping debris in riparian areas.
Unauthorized Egress	Stop work if work occurs beyond the fenced or flagged limits of authorized impact areas until the problem has been remedied to the satisfaction of the City.
Debris Disposal	Properly dispose of authorized vegetative debris that is removed by composting or at a permitted landfill. Do not dump vegetative debris into waterways or storm drainage systems.
Prohibit Plant and Wildlife Collecting	Do not collect plant species for any reason. Do not collect or harm wildlife species, including rattlesnakes, and contact the biologist/monitor to move species out of harm's way if necessary.
Access	Restrict vehicle access to existing roads and access ramps.
Erosion and Sediment Control	Avoid use of erosion control blankets that have plastic mesh in areas that amphibians and reptiles inhabit due to the potential to ensnare these species.
Minimize Spread of Exotic Species	Wash tools and equipment in designated areas prior to entering and exiting work areas, to ensure no plant material is transported on- or off-site.
During Maintenance Activities – Specific	
Oak Trees	Oaks require special avoidance. Heavy equipment will not encroach on the root protection zone (i.e., 50 feet from the drip line) within undeveloped areas, nor will equipment be staged/stockpiled in these areas. A qualified biologist will flag root protection zones as off-limits at applicable facilities, prior to starting work.

Nesting Season Avoidance	Vegetation clearing and trimming, dredging, and mechanized activities will occur outside of the typical breeding season for raptors and migratory birds (February 15 through September 15). However, if this is not possible, then a qualified biologist will conduct a bird nesting survey prior to project activities to determine the presence or absence of nests within the maintenance limits or surrounding buffer area (see below).
Pre-Activity Nesting Surveys	If avoidance of the breeding season is not possible, the following measures will be implemented: A pre-activity nest survey will be performed by a qualified biologist within 3 days prior to vegetation clearing, dredging, or mechanized activities that are proposed during the nesting season. If no active nests are found, then no further action is needed and the activity may proceed within 3 days of the pre-activity nest survey. If vegetation clearing, dredging, or other mechanized activities at a particular site must cease for 5 or more consecutive days during the nesting season, repeat nest surveys may be required to ensure new nesting locations have not been established. If an active nest is detected during pre-activity nest surveys, vegetation clearing, dredging, or other mechanized activities will not be conducted within a 300-foot radius (500-foot radius for raptors) of the detected nest until the qualified biologist determines the nest is no longer active (i.e., nestlings have fledged or the nest has failed). The qualified biologist will be on-site to ensure activities do not disturb active nests
State and Federally Listed Bird Species	For areas where listed bird species (e.g., least Bell's vireo and/or coastal California gnatcatcher) have potential to occur within, or within 500 feet of, the activity footprint, and avoidance of the breeding season is not possible, a qualified biologist will conduct focused surveys during three separate visits (on separate days), with the final visit being not more than 3 days prior to the project activity. These three survey visits will supersede the pre-activity nest surveys noted above. If a listed species is detected nesting within the maintenance limits or buffer during these surveys, activities at the site will be postponed and the City will contact the U.S. Fish and Wildlife Service (USFWS) within 24 hours to ensure proper avoidance and minimization measures are implemented. Activities at the work site will not resume until coordination with USFWS is complete and avoidance and minimization measures are implemented.
Bat Species	For sites where special status bat species have potential to occur within the maintenance footprint and/or 100-foot buffer, a qualified biologist will survey for roosting bats concurrently with the pre-activity surveys noted above. If feasible, vegetation clearance should be conducted during winter (November 1 through January 31) when bats are unlikely to have formed maternal roost sites or have young.

[1] A "qualified biologist" has experience and familiarity with the individual special status species and associated habitats. Qualified biologists should conduct any required surveys, conduct monitoring activities, and coordinate with the City to employ applicable avoidance and minimization measures. Where applicable, the qualified biologist would possess a Section 10(a)(1)(A) permit for the species and type of surveying or monitoring required, and the biologist's resume, qualifications statement, and permit number would be submitted to USFWS for approval 15 days before the initiation of species surveys and related monitoring duties.

[2] An "environmental monitor" has experience with the environmental protections prescribed for the activity. Environmental monitors would monitor and coordinate with the City to facilitate compliance with measures prescribed in environmental documents and terms and conditions required in agency permits. The "qualified biologist" may serve as the "environmental monitor."

For wildlife, the potential for suitable habitat to be present was first assessed by reviewing the 2019 and 2020 site-specific vegetation mapping, 2019 and 2020 photographs, and 2019 Google Earth imaging. Based on this desktop review, it was determined where focused field assessments were needed to investigate field conditions and suitability for sensitive wildlife species. The potential for special status wildlife species to occur at these select sites was evaluated in the field on May 9, 2019. The BRR determined that habitat potentially suitable to support the federally and state-listed least Bell's vireo (*Vireo bellii pusillus*) is present

within the maintenance limits of Sites 45 and 47. It was also determined that habitat potentially suitable to support eight other wildlife species of lower sensitivity status is present within the maintenance limits of several sites including: Harbison's dun skipper (*Euphyes vestris harbisoni*) at Site 47; two-striped gartersnake (*Thamnophis hammondii*) at Site 47; Coronado skink (*Plestiodon skiltonianus interparietalis*) at Sites 45 and 47; Cooper's hawk (*Accipiter cooperii*) at Sites 7, 45, 47, and 52 through 54; yellow warbler (*Setophaga petechia*) at Sites 2, 7, 42, 45, 47, and 53 through 54; yellow-breasted chat (*Icteria virens*) at Sites 45 and 47, western bluebird (*Sialia mexicana*) at Site 47, and western red bat (*Lasiurus blossevillii*) at Sites 7, 47, and 54. Within the buffers, habitat potentially suitable to support the aforementioned species is present in addition to habitat potentially suitable to support seven other special status wildlife species. Table 8 of the BRR contains additional details. By implementing the conservation measures noted in Table 5 above, the City will avoid potential impacts to listed wildlife species and/or critical habitat.

Aquatic Resources

The ARDR prepared for the revised Project entailed field assessments and desktop review to determine the presence and/or indicators of aquatic resources. The aquatic resources in the study area (maintenance site limits plus a 100-foot buffer) include areas along Buena Vista Creek and several unnamed tributaries that flow directly or indirectly into Agua Hedionda Creek or Guajome Creek. As summarized in Table 6, approximately 20.96 acres of wetlands and other waters were delineated within the study area, within which approximately 13.13 acres (9,871 linear feet) of wetlands and other waters were delineated within the maintenance limits.

Table 6. Aquatic Resources Present and Agencies Regulating those Resources

Water Type	Agency Jurisdiction	Acres within Maintenance Limits (linear feet)	Acres within Study Area (linear feet)
Non-Wetland Waters	RWQCB, CDFW	2.3490 (8,155)	3.1318 (13,974)
Wetland Waters	RWQCB, CDFW	4.0950 (N/A)	5.4987 (N/A)
Streambanks and Riparian Extent	CDFW	6.6893 (1,716)	12.3251 (1,901)
TOTAL		**13.1333 (9,871)**	**20.9556 (15,875)**

Source: ARDR (Attachment 5, Table 12) Totals may not sum due to rounding.

2.4.3 Authorized Maintenance Activities and Impact Assumptions

As discussed previously, the City re-evaluated and updated its site-specific maintenance needs; in this process, some sites were removed from the Project. The City now proposes to continue maintenance activities at 35 of the sites that have been maintained since 2009, and to conduct maintenance activities at seven new sites where the need for routine maintenance has been identified. Maintenance activities are unchanged from the original authorizations but have been grouped into five categories for regulatory jurisdiction clarification based on the type of work involved. Section 2.3.1 above contains descriptions of the five categories. Maintenance activities at the 35 sites that have been maintained since 2009 would be subject to the same area of regular maintenance as previously described for each site.

SECTION 3 ENVIRONMENTAL IMPACT ANALYSIS

This section presents a discussion of how the proposed changes to the Program affect the analyses and impact conclusions of the respective environmental issue sections in the 2008 MND. In summary, the CEQA analysis provided in the 2008 MND would not change because reissuance of RWQCB and CDFW authorizations and implementation of activities under those prospective authorizations would not lead to significant impacts that were not identified and addressed in the 2008 MND. Discussion of the effects of the reissued authorizations on biological resources (Section IV of the 2008 MND) and hydrology and water quality (Section VIII of the 2008 MND) is provided below. The 2008 MND analyzed an additional 14 resource issue areas and determined that the Program would have no impact or a less than significant impact in all cases. The proposed changes would similarly have no impact or a less than significant impact for these other resource issue areas, as well as on three additional resource issue areas which were added to the CEQA Guidelines, Appendix G in 2019. The new resource issue areas are Section VI, Energy, Section VIII Greenhouse Gas Emissions, Section XVIII Tribal Resources, and Section XX Wildfire. Additional changes to Appendix G include changes to how transportation impacts are analyzed, switching from Level of Service (LOS) to Vehicle Miles Traveled (VMT). These resource areas and analysis were not required components of CEQA when the 2008 MND was published and are not included in this Addendum. The Program changes did not affect the substance or conclusions of the 2008 MND and explanations of why the changes did not warrant detailed analysis of these other issue areas are provided in the table in Attachment 6.

3.1 Biological Resources

Section IV of the 2008 MND discusses the Program's effect on biological resources, concluding that issuance of the jurisdictional waters permits addressed in the 2008 MND has the potential to result in impacts to sensitive species and their habitat, and sensitive natural communities. The 2008 MND lists sensitive species and habitat that have the potential to be impacted during maintenance activities. As previously noted, the 2008 MND prescribed implementation of general protection measures (Mitigation Measure BR-1) and special protection measures (Mitigation Measure BR-2) to ensure that any potential direct and/or indirect impacts to species and habitat would be less than significant. Similarly, both the 2020 BRR and the 2020 BMP Manual prescribe implementation of general and special conservation measures that provide that any potential direct and/or indirect impacts to species and habitat would be less than significant; these measures are listed in Table 5 above.

This addendum revises Section IV of the 2008 MND to acknowledge the proposed reissuance from RWQCB and CDFW to reauthorize the previously allowed maintenance activities with the addition of seven new sites. In particular, the City conducted updated biological and aquatic resource field assessments for the previously authorized sites and the seven new sites and prepared reports to identify the potential for sensitive species and habitat since the original surveys that were conducted for the original permit authorizations (see the BRR and ARDR in Attachments 4 and 5 of this addendum). The resources that

coincide with maintenance limits would be subject to recurring non-regulated and regulated maintenance activities as summarized in Table 2 and described in Section 2.3.1.

As discussed in Section 2.3.2 of this addendum, four of the seven new maintenance activity sites proposed for coverage are located on unvegetated concrete channels (Sites 48 through 51). These four new concrete channel sites do not support habitat potentially suitable for sensitive species. Work at the four new unvegetated concrete channel sites would entail sediment removal to maintain proper stormwater drainage flow. The removal of accumulated sediment would not result in new ground disturbance and would result in limited effects to non-wetland waters. No mitigation is proposed for the work at the four new concrete channel sites.

Also as discussed in Section 2.3.2 of this addendum, the remaining three of the seven new maintenance activity sites proposed for coverage are located within earthen channels (Sites 52 through 54). No equipment use (i.e., handwork only) would occur within these earthen channels, which reduces the potential for impacts to species and habitat, as there would be a lesser amount of disturbance and less potential for leaks and exhaust, when compared to handwork. The habitat at the three new earthen channel sites is characterized predominantly by non-native woodland and disturbed wetland that was determined suitable for the sensitive species Cooper's hawk and yellow warbler; habitat suitable for western red bat is present at one site (see BRR in Attachment 4). No sensitive plant species were determined to occur within these new earthen sites (or within any of the sites). As discussed above, proposed work at the three new earthen channel sites would involve handwork only to trim the overgrowth of live vegetation, remove excessive urban debris, and remove dead vegetation. No sediment removal or new ground disturbance or alteration of the channel bed or bank is proposed; therefore, no mitigation is proposed for the work at these three new earthen channel sites.

Due to the type of work that would occur at the seven new sites, the additional impacts on jurisdictional habitat and species, beyond that which was considered in the 2008 MND, would not be considered new or more severe. Similarly, continuing maintenance activities at the 35 previously authorized sites would not be considered a more severe impact. However, consistent with the 2008 MND, with implementation of Mitigation Measures BR-1 and BR-2, standard construction measures via implementation of the City's new BMP Manual, and the BMP Checklist for Biological Resource Protection (see Table 5 above), impacts to sensitive species and their habitat would be reduced to less than significant.

Given the nature of the Program and the relevance of aquatic resources to permitting, additional details about the aquatic resources is provided. Table 7 provides a breakdown of each aquatic resource type (non-wetland waters, wetland waters, and streambanks and riparian extent) among sites where non-regulated versus regulated activities are proposed. Table 7 also provides subtotals of these areas for the 35 sites that have been maintained since 2009, and for the 7 new sites where the need for routine maintenance has been identified. As summarized in Table 7, there is 0.7082 acres of aquatic resources within maintenance limits where regulated activities are proposed among the original sites. In addition, there is 1.2394 acres of aquatic resources within maintenance limits where regulated activities are proposed among the new sites.

Table 7. Aquatic Resources within Maintenance Areas of Non-Regulated and Regulated Activities

Aquatic Resource Type	Agency Jurisdiction	Maintenance Work Areas (Acres)		
		Proposed Non-regulated Maintenance	Proposed Regulated Maintenance	Total
Original Sites (35)				
Non-Wetland Waters	RWQCB, CDFW	0.0648	0.3693	0.4341
Wetland Waters	RWQCB, CDFW	0.0755	0.3160	0.3915
Streambanks and Riparian Extent	CDFW	0.0668	0.0230	0.0897
Subtotal Original Sites		*0.2071*	*0.7082*	*0.9154*
New Sites (7)				
Non-Wetland Waters	RWQCB, CDFW	0.8592	1.0557	1.9149
Wetland Waters	RWQCB, CDFW	3.7035	0	3.7035
Streambanks and Riparian Extent	CDFW	6.4158	0.1837	6.5995
Subtotal New Sites		*10.9785*	*1.2394*	*12.2179*
Total All Sites		**11.1856**	**1.9476**	**13.1333**

Totals may not sum due to rounding.

As summarized in Attachment 1, the original 2009 and 2010 permits authorized 0.300 acres of vegetated and non-vegetated waters that were under RWQCB and CDFW jurisdiction, and an additional 0.15 acres of vegetated waters under CDFW jurisdiction only. Amendments to the original permits (late 2009 and 2012) added 12 new sites which increased the impacts authorized by CDFW to 0.827 acres of vegetated and non-vegetated waters under RWQCB and CDFW jurisdiction, and an additional 0.284 acres of vegetated waters under CDFW jurisdiction only.

It is difficult to make a direct comparison of the previously authorized impacts to the aquatic resource calculations presented in Table 7. During the original and amended permitting efforts, the proposed maintenance and work limits are only described in brief paragraphs. Corresponding site figures present vegetation communities and depict channels as a blue line with a notation of the jurisdictional width. The cubic yards of sediment to be removed and the distance out from the stormwater feature that dredging would occur was also described. The square feet of impacts that were authorized at each site align with this more impactful activity description. Non-regulated activities such as trash and debris removal and vegetation trimming were described; however, work limits within which such non-regulated activities would be conducted were not depicted on site figures. Therefore, the area wherein the City had been conducting low impact activities was not associated with a site-specific acreage. For the BMP Manual, maintenance limits were added to each site figure to depict the area wherein such activities would occur. To create the site-specific work limits that denote where all types of maintenance activities may occur, AECOM biologists first used the original descriptions to estimate in a geographic information system (GIS) the extent of the original work limits. Then through a working meeting, the City and AECOM reviewed and adjusted work limit polygons to account for property lines, appropriate placement relevant to stormwater features, and to delineate the areas wherein DPW conducts its low impact maintenance activities within and adjacent to

channels. In the process, 12 of the previously authorized sites were identified to be removed from the Project because on-going maintenance is no longer necessary at those locations. For the BRR and ARDR, the finalized maintenance limits were used to calculate the area of vegetation communities and aquatic resources at each maintenance site.

Attachment 7 presents a comparison of the previously authorized activities, the currently proposed activities, and a finding on whether the impacts now proposed are less or somewhat greater than the originally authorized maintenance work. The findings among the 42 sites (35 original sites plus 7 new sites) are as follows:

- At 20 sites, proposed maintenance activities will be less impactful than the originally authorized work. Previously permitted activities such as focused repair and use of riprap were one-time events. Maintenance conducted thereafter, and now proposed, is trash and debris removal with other site-specific routine maintenance, as needed and noted in Attachments 2 and 7.
- At 14 sites, the City proposes the same activities as previously authorized.
- At one site, the City proposes to use equipment in the channel where previously only handwork was proposed.
- At the 7 new sites, the proposed maintenance activities are newly proposed, and maintenance at these sites was not previously described. These new sites include four locations along existing concrete channels where removal of accumulated sediment is proposed and focused work at three earthen channels along Buena Vista Creek where removal of dead vegetation, trash, and debris, and focused tree trimming are proposed to improve the ability for law enforcement to monitor transient activities within the creek canopy. Six of these seven new sites are along Buena Vista Creek and one is on a tributary to Buena Vista Creek. Therefore, it is of note that Buena Vista Creek is on the 303 (d) list of impaired waters, for benthic community effect, Bifenthrin, toxicity and selenium from all unknown sources. The Buena Vista watershed has recurring problems with sedimentation from urban runoff and often collects trash of unknown origin or makeup. The activities proposed at the new sites would have beneficial effects on Buena Vista Creek.

Proposed work at the new sites will not generate substantive impacts when conducted in accordance with the BMP Manual and anticipated conditions of the new permits. For all sites where periodic sediment and/or vegetation removal is proposed, the maintenance will provide a net improvement drainage hydraulic function.

While the area of maintenance for the 35 originally authorized sites has not changed since original permit issuance, the impact acreages as shown in Table 6 are somewhat greater than those originally authorized. The change in acreage could be due to a variety of factors such as a focus on areas where activities are regulated by CDFW and RWQCB. Regardless, the limits of the originally authorized sites and the area subject to equipment or handwork within the drainages are unchanged. Maintenance limits were defined on figures for the first time in 2020. A comparison of the work described in the 2008 MND, the original

2009/2010 permits, and in the 2012 amendment to the work now proposed show that at all sites there will be no substantial increase in biological resource impacts over what was previously described in the 2008 MND.

The City successfully completed mitigation for the originally authorized channel sites, as described in Section 2.1.3 above. No new mitigation is proposed for continuing maintenance at the previously authorized sites. Consistent with the 2008 MND, with implementation of Mitigation Measures BR-1 and BR-2, standard construction measures via implementation of the City's new BMP Manual, and the BMP Checklist for Biological Resource Protection (included in Table 5 above), impacts to wetland and non-wetland waters would be reduced to less than significant. In the event that RWQCB and CDFW require additional measures specific to the maintenance activities proposed to be covered in the City's revised channel maintenance Project, these would not be considered new mitigation measures needed to avoid or reduce significant impacts pursuant to CEQA.

The revised Project would not result in additional or different impacts to biological resources beyond that which was considered in the 2008 MND, as the activities proposed for coverage in the proposed reissuance are of the same type incorporated into the 2008 MND Project description and considered in the impact analysis. The same habitat and/or species occur on the new sites and no new rare species or additional species permitting is needed. The new details regarding the revised Project's biological resource impacts do not constitute substantial new information to the 2008 MND that would warrant preparation of a subsequent or supplemental MND. Reissuance would not result in a new significant impact or a substantial increase in significant biological resource impacts compared to those considered in the 2008 MND.

3.2 Hydrology and Water Quality

Section VIII of the 2008 MND discusses the Project's effect on surface water quality concluding that issuance of the jurisdictional waters permits addressed in the 2008 MND would not affect water quality, but that the revised Project itself is intended to reduce certain pollutants that have collected at portions of creeks and tributaries as a result of stormwater runoff. The 2008 MND notes that temporary maintenance activities within the City's creeks and tributaries would be required; however, once maintenance activities are complete, stormwater flow would be improved and would not permanently affect water quality. The 2008 MND further clarifies that no excavation into subsurface material would occur during Project implementation. As previously noted, the 2008 MND prescribed implementation of general protection measures (Mitigation Measure BR-1) to control sediment and soil erosion and reduce potential hydrology and water quality impacts to less than significant.

This addendum revises Section VIII of the 2008 MND to acknowledge the proposed reissuance from RWQCB and CDFW to reauthorize the previously allowed maintenance activities with the addition of seven new sites. In particular, the new maintenance activities, in addition to the previously permitted maintenance activities, would be required to adhere to the standard construction measures and mitigation measures set forth in the 2008 MND via implementation of the City's BMP Manual. The BMP Manual

discusses existing regulatory requirements and the roles and responsibilities of the City, summarizes the types of maintenance activities conducted, includes guidance on BMP selection and implementation, identifies biological resources in or adjacent to maintenance sites and includes measures to avoid or minimize impacts to those resources (i.e., the BMP Checklist for Biological Resource Protection), and concludes with the City's process for record keeping and reporting. The BMP Manual also includes a BMP Checklist which lists BMPs that must be implemented prior to conducting the activity such as avoiding conducting maintenance during wet weather or when rain is forecasted within the maintenance work period as well as BMPs that must be implemented during the activity such as implementing soil-tracking-control BMPs (i.e., metal corrugated shaker plates and gravel strips to limit off-site transport of sediment from vehicles), ensuring that all maintenance vehicles and equipment are well maintained and not leaking fluids, and installing a temporary dam or other artificial obstruction using materials that will cause little or no siltation and ensure water does not enter the work area when water diversion is necessary, to name a few. The BMP Checklist is included as Appendix D of the BMP Manual. All maintenance activities would be required to implement Mitigation Measures BR-1 and BR-2 and standard construction measures (via implementation of the City's new BMP Manual), which would reduce potential water quality impacts to less than significant.

The proposed reissuance would not result in additional or different impacts on water quality beyond that which was considered in the 2008 MND, as the activities proposed for coverage in the authorizations are the same activities incorporated in the 2008 MND Project description and considered in the impact analysis. While the proposed reissuance would add seven new sites to the Project, the new sites are located in previously disturbed earthen and concrete channels, consistent with the sites previously permitted. Additionally, the three of the seven new sites (Sites 52 through 54; earthen channels) would entail hand work only, which reduces the potential for fuels and lubricants to enter surface water, compared to when mechanized equipment is used. There would be no new ground disturbance at these sites, reducing the potential for water quality impacts. The other four new sites (Sites 48 through 51) would entail work in concrete channels which reduces the potential for unintended earthen material to enter surface waters. The removal of sediment at these four sites would not result in new ground disturbance. All maintenance activities would be required to implement Mitigation Measures BR-1 and BR-2 and standard construction measures (via implementation of the City's new BMP Manual), which would reduce potential water quality impacts to less than significant.

As discussed above and in the 2008 MND, the purpose of the Project is to reduce pollutants that have collected at portions of creeks and tributaries as a result of stormwater runoff. Continued maintenance at the previously authorized sites and addition of the seven new sites would further implement the Project purpose.

The revised Project would not result in additional or different impacts to hydrology and water quality beyond that which was considered in the 2008 MND, as the activities proposed for coverage in the proposed reissuance are of the same type incorporated into the 2008 MND Project description and considered in the impact analysis. The new details regarding the revised Project's hydrology and water quality impacts do

not constitute substantial new information to the 2008 MND that would warrant preparation of a subsequent or supplemental MND. Reissuance would not result in a new significant impact or a substantial increase in significant water quality impacts compared to those considered in the 2008 MND.

SECTION 4 ENVIRONMENTAL DETERMINATION

The City previously prepared and adopted an MND for the Project, as described in Section 1 of this document. Based on a review of the current Project, the City has determined, pursuant to CEQA Section 21166 and CEQA Guidelines Sections 15162 and 15163, that:

a. There are no new significant environmental effects that were not considered in the 2008 MND or a substantial increase in the severity of previously identified significant environmental effects as a result of the proposed changes in the Project;

b. No substantial changes have occurred with respect to the circumstances under which the Project would be undertaken;

c. There is no new information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time that the 2008 MND was adopted; and

d. The mitigation measures and alternatives previously found not to be feasible remain as such; no new mitigation measures or alternatives exist that would substantially reduce the previously identified significant effects.

Therefore, in accordance with CEQA Section 21166 and CEQA Guidelines Sections 15162 and 15164, a subsequent or supplemental MND is not required, and this addendum, prepared pursuant to CEQA Guidelines Section 15164, provides adequate compliance with CEQA.

John Conley
Community Development and Engineering Director

11/9/2020
Date

This page intentionally left blank.