

**ADDENDUM TO THE CERTIFIED
FINAL JOINT ENVIRONMENTAL IMPACT
STATEMENT/ENVIRONMENTAL IMPACT REPORT FOR
THE SAN CLEMENTE SHORELINE PROTECTION PROJECT**

STATE CLEARINGHOUSE NUMBER: 2010084002

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ADDENDUM TO THE CERTIFIED FINAL JOINT ENVIRONMENTAL IMPACT STATEMENT/ENVIRONMENTAL IMPACT REPORT

SAN CLEMENTE SHORELINE PROTECTION PROJECT

INTRODUCTION

Overview and Purpose of Analysis

This document is an Addendum to the Certified Final Joint Environmental Impact Statement (EIS)/ Environmental Impact Report (EIR) (SCH: 2010084002) for the San Clemente Shoreline Protection Project (the “Project”). The Final EIS/EIR (Certified EIS/EIR) was certified by the City of San Clemente on July 18, 2023 in conjunction with Project approval. This Addendum addresses modifications to the Project to add an additional offshore borrow area for obtaining sand for placement at the San Clemente Beach for nourishment and protection and provides an analysis to support the City’s determination that an Addendum to the Certified EIS/EIR is appropriate and is in compliance with the California Environmental Quality Act (CEQA). This Addendum amends the Certified EIS/EIR only for purposes of CEQA compliance. The U.S. Army Corps of Engineers (USACE) is preparing a separate Supplemental Environmental Assessment for purposes of compliance with the National Environmental Policy Act (NEPA).

This Addendum clarifies or amplifies the information contained in the Certified EIS/EIR and none of the conditions described in the State CEQA Guidelines Section 15162 calling for preparation of a subsequent or supplemental EIR have occurred. This analysis has determined that there are no new significant environmental effects and no substantial increase in the severity of previously identified significant environmental effects associated with the modifications to the Project. Furthermore, there are no known mitigation measures or alternatives that were previously considered infeasible but are now considered feasible that would substantially reduce one or more significant effects on the environment previously identified in the Certified EIS/EIR. There are no known mitigation measures or alternatives that are considerably different than those required by the Certified EIS/EIR that would substantially reduce one or more significant effects on the environment identified in the Certified EIS/EIR.

Project Background

As noted previously, the San Clemente Shoreline Protection Project (the Approved Project) was approved and the EIS/EIR was certified on July 18, 2023. As described in the Certified EIS/EIR, the Approved Project is intended to provide shore protection through nourishment of the beach at the San Clemente Pier. Coastal erosion is a very significant problem in the City of San Clemente that threatens public beaches, coastal public access, existing structures, and critical public infrastructure. The Approved Project includes the maintenance and protection of the San

Clemente beach which is needed to prevent the severe beach erosion that results from winter storms and to prevent damage to adjacent beachfront structures, including the heavily used rail line that runs along the beach through the City of San Clemente. The Certified EIS/EIR analyzed two beach width alternatives (50 feet and 115 feet). The 50-foot beach width alternative was selected and is the Approved Project.

Pursuant to the Approved Project, the design beach fill consists of a 50-foot-wide beach, approximately 3,600 feet long and a design foreshore slope of 8H:1V. The material to construct the beach will be dredged from an approved borrow site located approximately 18 miles south of the Project site offshore of Oceanside Harbor (see **Figure 1**). Approximately 250,000 cubic yards of material will be placed during each dredging and beach fill episode. An estimated nine dredging and beach fill episodes are planned to occur over a 50-year period. The Project will be constructed with hopper dredging equipment with pump ashore capability and conventional earthmoving equipment. The medium-sized hopper dredge that will be used has a capacity of 3,500 cubic yards (cy) and pumps out dredge material via a 24" pipeline at 1,800 cubic yards/hour (cy/hr). Dredging as part of the Approved Project began in December 2023.

Overview of Modified Project

The Approved Project as described in the Certified EIS/EIR would be modified by adding an additional offshore borrow site at Surfside-Sunset that would be used for obtaining dredge material to nourish the beach (Modified Project). Under the Modified Project, either borrow site could be used, but the frequency of dredging and beach fill episodes would remain the same (there is only one dredge thus only one borrow site could be used at a given time). There would be no other changes to the Approved Project (e.g., no changes to beach fill location or episodes, total dredge volume or beach fill quantities). The additional offshore borrow area is needed due to operational challenges the USACE construction contractor is encountering at the approved offshore Oceanside borrow area and to allow for operational flexibility. The proposed borrow site at Surfside-Sunset is located approximately one mile offshore and located approximately 30 nautical miles northwest of San Clemente (See **Figure 1**). The proposed borrow site at Surfside-Sunset is currently being utilized for the Surfside-Sunset Stage 13 Project, which is a similar beach restoration project in southern California.

Figure 1: Location of Offshore Borrow Areas



CEQA Requirements

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

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

1. Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;”
2. Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
3. New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the negative declaration was adopted, shows any of the following:
 - a. The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - b. Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - c. Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - d. Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.”

Similarly, the CEQA Statute, Public Resources Code (PRC) Section 21166, states that: “When an environmental impact report has been prepared for a project pursuant to this division, no subsequent or supplemental environmental impact report shall be required by the lead agency or by any responsible agency, unless one or more of the following events occurs:

- a. Substantial changes are proposed in the project which will require major revisions of the environmental impact report.

- b. Substantial changes occur with respect to the circumstances under which the project is being undertaken which will require major revisions in the environmental impact report.
- c. New information, which was not known and could not have been known at the time the environmental impact report was certified as complete, becomes available.”

The supplemental environmental review and analysis of the Modified Project provided below has determined that there are no new significant environmental effects and no substantial increase in the severity of previously identified significant effects with the Modified Project. Furthermore, there are no known mitigation measures or alternatives that were previously considered infeasible but are now considered feasible that would substantially reduce one or more significant effects on the environment previously identified in the Certified EIS/EIR. There are no known mitigation measures or alternatives that are considerably different than those required by the Certified EIS/EIR that would substantially reduce one or more significant effects on the environment identified in the Certified EIS/EIR. Therefore, neither a subsequent EIR nor a supplemental EIR is required. An Addendum to the Certified EIS/EIR, as permitted under the State CEQA Guidelines Section 15164, is appropriate.

Previous Environmental Documents Incorporated by Reference

Consistent with Section 15150 of the State CEQA Guidelines, the following document was used in preparation of this Addendum:

- Final Joint EIS/EIR (SCH: 2010084002) for the San Clemente Shoreline Protection Project (Certified EIS/EIR)

Pursuant to the State CEQA Guidelines, Section 15150(b), the above document is available for review at:

<https://www.san-clemente.org/departments-services/planning-services/long-range-planning-projects/beach-restoration-project>

The above document is also available for review in-person (by appointment) during business hours at the following location:

City of San Clemente
910 Calle Negocio
San Clemente, CA 92673
(949) 361-6100

Consistent with Sections 15164(c)-(d) of the State CEQA Guidelines, this Addendum will be attached to the Certified EIS/EIR and the City will consider this Addendum together with the Certified EIS/EIR prior to making any decision on the Modified Project.

SUPPLEMENTAL ENVIRONMENTAL REVIEW

Analysis of Impacts

This section provides an impact assessment of the Modified Project. A modified or hybrid environmental checklist modeled off the CEQA Guidelines Appendix G Checklist was used to compare the anticipated environmental effects of the Modified Project with those disclosed in the Certified EIS/EIR and to review whether any of the conditions set forth in PCR, Section 21166 or State CEQA Guidelines Section 15162, requiring preparation of a subsequent or supplemental EIR, have been triggered.

The impact areas addressed in the Certified EIS/EIR include Air Quality and Meteorology, Geology and Topography, Water Resources (Water Quality, Sediments, and Oceanography), Biological Resources, Cultural Resources, Ground and Vessel Transportation, Land Use and Policy, Noise, Recreation, Aesthetics and Public Health and Safety. The 2023 State CEQA Guidelines Appendix G Checklist includes new impact areas that were not listed as impact areas in the 2011 State CEQA Guidelines Appendix G (e.g., Energy, Tribal Cultural Resources and Wildfire) and therefore were not specific sections in the Certified EIS/EIR.¹

The environmental effects for each impact area addressed in the 2023 State CEQA Guidelines Appendix G Checklist are evaluated here for informational purposes and to ensure a conservative approach. The following is a demonstration of how the 2023 State CEQA Guidelines Appendix G Checklist was modified to match the questions pertinent to State CEQA Guidelines Section 15162, which are repeated in each topic area of the modified checklist.

The Impact Determination Set Forth in the Certified EIS/EIR

This column sets forth the impact determination made in the Certified EIS/EIR.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Pursuant to Section 15162(a)(1) of the State CEQA Guidelines, this column indicates whether the Modified Project would result in new significant impacts that have not already been considered and mitigated by the prior environmental review or a substantial increase in the severity of a previously identified impact.

Any new Circumstances Involving New Impacts or Substantially More Severe Impacts?

Pursuant to Section 15162(a)(2) of the State CEQA Guidelines, this column indicates whether there have been changes to the Project (circumstances under which the project is undertaken)

¹ The approximately 12-year delay between EIS/EIR completion and certification was due to lack of federal and state government funding and a lengthy preconstruction engineering and design phase (PED), which consisted of two years of pre-construction monitoring. Once the PED phase was complete, the City of San Clemente then had to secure additional federal and state government funding to enable the Project to move forward into Congressional authorization and construction funding phases.

which have occurred subsequent to the prior environmental documents, which would result in the Modified Project having new significant environmental impacts that were not considered in the prior environmental review or that substantially increase the severity of a previously identified impact.

Any new Information Requiring New Analysis or Verification?

Pursuant to Section 15162(a)(3)(A-D) of the State CEQA Guidelines, this column indicates whether new information of substantial importance which was not known and could not have been known with the exercise of reasonable diligence at the time the previous environmental documents were certified as complete is available requiring an update to the analysis of the previous environmental documents to verify that the environmental conclusions and mitigations remain valid. If the new information shows that: (A) the Modified Project would have one or more significant effects not discussed in the prior environmental documents; or (B) that significant effects previously examined will be substantially more severe than shown in the prior environmental documents; or (C) that mitigation measures or alternatives previously found not to be feasible would in fact be feasible and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or (D) that mitigation measures or alternatives which are considerably different from those analyzed in the prior environmental documents would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative, then the question would be answered ‘Yes’ requiring the preparation of a subsequent or supplemental EIR. However, if the additional analysis completed as part of this environmental review finds that the conclusions of the prior environmental documents remain the same and no new significant impacts are identified, or identified environmental impacts are not found to be more severe, or additional mitigation or alternatives that the project proponent declines to adopt, then the question would be answered ‘No’ and additional environmental documentation (supplemental or subsequent EIR) is not required.

Mitigation Measures Addressing Impacts

Pursuant to Section 15162(a)(3) of the State CEQA Guidelines, this column indicates whether the prior environmental document provides mitigation measures to address effects in the related impact category. In some cases, mitigation measures have already been implemented. A ‘Yes’ response is provided in either instance. If ‘No’ is indicated, this Environmental Review concludes that the impact does not occur with this Project and therefore no mitigation measures are needed.

Discussion and Mitigation Sections

Discussion

A discussion of the elements of the checklist is provided under each environmental category to clarify the answers. The discussion provides information about the environmental issues, how the Project relates to the issue and the status of any mitigation that may be required or that has already been implemented.

Mitigation Measures

Appendix A includes the Adopted Mitigation Monitoring and Reporting Program (MMRP) for the Approved Project from July 2023. The MMRP includes the adopted mitigation measures as well as other Environmental Monitoring Commitments.

Conclusions

A discussion of the conclusion relating to the analysis contained in each section.

I. AESTHETICS

Environmental Issue Area	Impact Determination in the Certified EIS/EIR?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIS/EIR's Mitigation Measures Addressing Impact
I. Aesthetics. Would the Modified Project:					
a) Have a substantial adverse effect on a scenic vista?	Less than Significant	No	No	No	No
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No Impact	No	No	No	No
c) Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Less than Significant	No	No	No	No
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less than Significant	No	No	No	No

Impact Determination in the Certified EIS/EIR

Impacts to Aesthetics are discussed in Section 5.10, Aesthetics of the Certified EIS/EIR. The Certified EIS/EIR concluded that impacts associated with thresholds (a), (c) and (d) would be less than significant and no impact associated with threshold (b) would occur.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The proposed modifications to the Approved Project are limited to adding the additional offshore borrow area for obtaining sand for placement at the San Clemente Beach. The Modified Project would not involve changes that could affect scenic vistas or scenic resources, degrade the visual character or quality of the Project site, or introduce a new source of light and glare that would

affect views in the area because the Surfside-Sunset borrow site is approximately one mile offshore and would hardly be visible, and dredging operations would only take place for approximately three hours per day over a one-to-two month period every approximately six years (nine dredging and beach fill episodes are planned to occur over a 50-year period). Thus, as with the Approved Project, impacts related to Aesthetics set forth in thresholds (a) through (d) above would be less than significant or no impact under the Modified Project. Therefore, the Modified Project would not create any new significant impacts related to Aesthetics nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the scope of impacts set forth in the Certified EIS/EIR.

Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?

There are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the Certified EIS/EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to Aesthetics. No substantial changes in the environment have occurred since certification of the Certified EIS/EIR, and no substantial new impacts related to Aesthetics have been identified that would result in new or more severe significant environmental impacts. As determined above, the Modified Project would not result in any new or substantially more severe impacts related to Aesthetics, and a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impact

None.

Conclusion

No new or more severe significant environmental impacts to Aesthetics would occur as a result of the Modified Project. Therefore, the impacts to Aesthetics do not require a subsequent or supplemental EIR pursuant to PCR, Section 21166(c) or the State CEQA Guidelines, Sections 15162 or 15163.

II. AGRICULTURE AND FORESTRY RESOURCES

Environmental Issue Area	Impact Determination in the Certified EIS/EIR?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIS/EIR's Mitigation Measures Addressing Impact
<p>II. Agriculture and Forestry Resources. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and the forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the Modified Project:</p>					
<p>a) 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?</p>	<p>Not Analyzed in the Certified EIS/EIR</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>No</p>
<p>b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?</p>	<p>Not Analyzed in the Certified EIS/EIR</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>No</p>
<p>c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?</p>	<p>Not Analyzed in the Certified EIS/EIR</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>No</p>
<p>d) Result in the loss of forest land of conversion of forest land to non-forest use?</p>	<p>Not Analyzed in the Certified EIS/EIR</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>No</p>
<p>e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or</p>	<p>Not Analyzed in the Certified EIS/EIR</p>	<p>No</p>	<p>No</p>	<p>No</p>	<p>No</p>

conversion of forest land to non-forest use?					
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Impact Determination in the Certified EIS/EIR

Impacts to Agriculture and Forestry Resources were not analyzed in the Certified EIS/EIR.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The proposed modifications to the Approved Project are limited to adding the additional offshore borrow area for obtaining sand for placement at the San Clemente Beach. The proposed Surfside-Sunset borrow site is located approximately one mile offshore away from the nearest coastline. Therefore, there would be no impacts to forest land or farmland in the vicinity of the proposed borrow site. Thus, the Modified Project would have no impacts related to Agriculture and Forestry Resources set forth in thresholds (a) through (e) above. Therefore, the Modified Project would not create any new significant impacts related to Agriculture and Forestry Resources.

Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?

There are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the Certified EIS/EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to Agriculture and Forestry Resources. No substantial changes in the environment have occurred since certification of the Certified EIS/EIR, and no substantial new impacts related to Agriculture and Forestry Resources have been identified that would result in new or more severe significant environmental impacts. As determined above, the Modified Project would not result in any new or substantially more severe impacts related to Agriculture and Forestry Resources, and a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impact

None.

Conclusion

No new significant environmental impacts to Agriculture and Forestry Resources would occur as a result of the Modified Project. Therefore, the impacts to Agriculture and Forestry Resources do not require a subsequent or supplemental EIR pursuant to PCR, Section 21166(c) or the State CEQA Guidelines, Sections 15162 or 15163.

III. AIR QUALITY

Environmental Issue Area	Impact Determination in the Certified EIS/EIR?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIS/EIR's Mitigation Measures Addressing Impact
III. Air Quality. Would the Modified Project:					
a) Conflict with or obstruct implementation of the applicable air quality plan?	Less than Significant	No	No	No	No
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard.	Less than Significant with Mitigation Incorporated	No	No	No	Yes
c) Expose sensitive receptors to substantial pollutant concentrations?	Less than Significant	No	No	No	No
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Less than Significant	No	No	No	No

Impact Determination in the Certified EIS/EIR

Impacts to Air Quality are discussed in Section 5.1, Air Quality and Meteorology of the Certified EIS/EIR. The Certified EIS/EIR concluded that impacts associated with thresholds (a), (c) and (d) would be less than significant, and impacts associated with threshold (b) would be significant but mitigated to less than significant through incorporation of MM-AQ-50-3.1 and MM-AQ-50-3.2. The Certified EIS/EIR also concluded that the Approved Project would have significant and unavoidable cumulative air quality impacts.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The proposed modifications to the Approved Project are limited to adding the additional offshore borrow area for obtaining sand for placement at the San Clemente Beach. The Modified Project involves the use of the Surfside-Sunset borrow site, which is within the South Coast Air Basin (SCAB). The use of the Surfside-Sunset borrow site on a given day instead of the Oceanside borrow site would result in greater emissions in the SCAB and less emissions in the San Diego Air Basin (SDAB) (since the Surfside-Sunset borrow site is outside of the SDAB and entirely

within the SCAB). Thus, the emissions increase in the SCAB due to the Modified Project was calculated and compared to South Coast Air Quality Management District (SCAQMD) significance thresholds to assess if there would be a substantially more severe impact. **Table 1** displays the net dredge emissions by air basin under the Modified Project as a result of dredging at the Surfside-Sunset borrow site (See **Appendix B** – Air Quality Analysis for more details).

Table 1: Surfside-Sunset Borrow Site Net Dredge Emissions by Air Basin (lbs/day)

BASIN	CO	NO _x	VOC	SO _x	PM ₁₀
SDAB	-199.07	-1339.18	-36.19	-85.96	-40.72
Threshold	550	250	75	250	100
Exceeds Threshold?	No	No	No	No	No
SCAB	17.05	35.11	17.92	-39.58	-12.23
Threshold	550	100	75	150	150
Exceeds Threshold?	No	No	No	No	No

Note: (1) The negative values indicate an emissions reduction. This is because the dredge to be used has a cleaner engine and lower emission factors than what was assumed in the Certified EIS/EIR due to recent regulatory requirements.

(2) Since the Modified Project only involves a new borrow site, all other aspects of the Project including onshore emission sources remain unchanged from what was analyzed in the Certified EIS/EIR.

As detailed in **Table 1** and **Appendix B**, the use of the Surfside-Sunset borrow site would result in net emissions that would be below the applicable SCAQMD thresholds (and a substantial decrease of emissions in the SDAB). Thus, as with the Approved Project, impacts related to Air Quality set forth in thresholds (a), (c) and (d) above would be less than significant and impacts related to Air Quality set forth in threshold (b) would be less than significant with mitigation under the Modified Project (the mitigation measures only apply to onshore activities which remain unchanged the Modified Project). Therefore, the Modified Project would not create any new significant impacts related to Air Quality nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the scope of impacts set forth in the Certified EIS/EIR.

Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?

There are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the Certified EIS/EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to Air Quality. No substantial changes in the environment have occurred since certification of the Certified EIS/EIR, and no substantial new impacts related to Air Quality have been identified that would result in new or more severe significant environmental impacts. As determined above, the

Modified Project would not result in any new or substantially more severe impacts related to Air Quality, and a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impact

The MMRP in **Appendix A** includes mitigation measures and Environmental Monitoring Commitments. Mitigation measures MM-AQ-50-3.1 and MM-AQ-50-3.2 would be implemented as part of the Modified Project to mitigate Air Quality Impacts. See **Appendix A** for a full description of the Air Quality mitigation measures.

Conclusion

No new or more severe significant environmental impacts to Air Quality would occur as a result of the Modified Project. Therefore, the impacts to Air Quality do not require a subsequent or supplemental EIR pursuant to PCR, Section 21166(c) or the State CEQA Guidelines, Sections 15162 or 15163.

IV. BIOLOGICAL RESOURCES

Environmental Issue Area	Impact Determination in the Certified EIS/EIR?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIS/EIR's Mitigation Measures Addressing Impact
IV. Biological Resources. Would the Modified Project:					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	Less than Significant	No	No	No	No
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	Significant and Unavoidable	No	No	No	Yes
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Not Analyzed in the Certified EIS/EIR	No	No	No	No
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Less than Significant	No	No	No	No
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Not Analyzed in the Certified EIS/EIR	No	No	No	No

Environmental Issue Area	Impact Determination in the Certified EIS/EIR?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIS/EIR's Mitigation Measures Addressing Impact
IV. Biological Resources. Would the Modified Project:					
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	Not Analyzed in the Certified EIS/EIR	No	No	No	No

Impact Determination in the Certified EIS/EIR

Impacts to Biological Resources are discussed in Section 5.4, Biological Resources of the Certified EIS/EIR. The Certified EIS/EIR concluded that impacts associated with thresholds (a) and (d) would be less than significant. The Certified EIS/EIR determined that the Approved Project would result in impacts that would be significant and unavoidable to impact (b) even after implementation of the mitigation measures in the Certified EIS/EIR. The Certified EIS/EIR did not provide any analysis for thresholds (c), (e) and (f).

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Modified Project would have no impacts to riparian habitats, trees, or any state or federally protected wetlands, or applicable habitat conservation plans as set forth in thresholds (c), (e) and (f) above as the Surfside-Sunset borrow site is one mile offshore, contains no riparian habitats, trees, or wetlands, and there are no local, regional, or state plans applicable to the borrow site. The Modified Project would continue to implement the mitigation measures and Environmental Monitoring Commitments included in the Adopted MMRP.

To address potential biological impacts to Green Sea Turtles (GST) from the Modified Project, USACE prepared a Biological Evaluation, dated February 2024, which is included in **Appendix C** of this Addendum (USACE, 2024a). The Biological Evaluation states that there is absence of bedrock, reef or surfgrass in the borrow area and there are no locations nearby that provide forage opportunities for GST (USACE, 2024a). Any potential effects to GST would be from direct contact injuries from vessel collisions. However, given the relatively deep water in which the dredge would be transiting, direct collision with GST is highly unlikely (USACE, 2024a). The USACE concluded that the Modified Project would not result in substantive new or different direct effects to GST beyond those already addressed with implementation of the approved mitigation measures and Environmental Monitoring Commitments (USACE, 2024a). The National Marine Fisheries Service (NMFS) concurred with the Biological Evaluation on February 22, 2024.

Potential direct and indirect impacts to marine resources at the Surfside-Sunset borrow site under the Modified Project would be similar to those described in the Certified EIS/EIR. Dredging would be performed in the same way, and the depth of cut and volume removed would be similar. Both borrow sites are of similar size, resulting in approximately double the extent of surface area and sea bottom disturbance if both sites are used. Temporary effects to benthic habitat and organisms caused by dredging activities would be expanded over a larger area, including both direct entrainment and indirect effects caused by turbidity. Motile organisms would likely be able to avoid the direct dredge footprint. The invertebrate community is expected to recover over a period of several months to a few years through recruitment from surrounding undisturbed areas. As the Surfside-Sunset borrow site does not contain sensitive biological habitat such as kelp beds, rocky reef or surfgrass, there would be no short-term or long-term net loss of habitat value within those environments.

The effects of using the Surfside-Sunset borrow site on essential fish habitat would be similar to those described in the Certified EIS/EIR. Impacts such as turbidity associated with dredging and placement of dredged materials would be temporary and insignificant. The process of dredging sandy bottom sediment would remain the same whether the activity occurs at the Oceanside or Surfside-Sunset borrow site and the Modified Project would continue to implement the mitigation measures and Environmental Monitoring Commitments included in the Adopted MMRP.

Based on the above, the Modified Project would not create any new significant impacts regarding Biological Resources nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the scope of the Certified EIS/EIR.

Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?

There are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the Certified EIS/EIR.

Any New Information Requiring New Analysis or Verification?

As discussed above, the USACE concludes that the Modified Project would not result in substantive new or different direct effects to GST beyond those already addressed previously (USACE, 2024a). There is no new information of substantial importance that has become available relative to Biological Resources. No substantial changes in the environment have occurred since certification of the Certified EIS/EIR, and no substantial new impacts related to Biological Resources have been identified that would result in new or more severe significant environmental impacts. As determined above, the Modified Project would not result in any new or substantially more severe impacts related to Biological Resources, and a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impact

The Adopted MMRP in **Appendix A** includes mitigation measures and Environmental Monitoring Commitments. The following mitigation measures and Environmental Monitoring

Commitments would be implemented: Green Sea Turtle Monitoring Program, Grunion Monitoring Program, Eelgrass Monitoring Program, Caulerpa Monitoring Program, MM-BR-50-2.1 and MM-BR-50-2.2. See **Appendix A** for a full description of the Biological Resources mitigation measures and Environmental Monitoring Commitments.

Conclusion

No new or more severe significant environmental impacts to Biological Resources would occur as a result of the Modified Project. Therefore, the impacts to Biological Resources do not require a subsequent or supplemental EIR pursuant to PCR, Section 21166(c) or the State CEQA *Guidelines*, Sections 15162 or 15163.

V. CULTURAL RESOURCES

Environmental Issue Area	Impact Determination in the Certified EIS/EIR?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIS/EIR’s Mitigation Measures Addressing Impact
V. Cultural Resources. Would the Modified Project:					
a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	No Impact	No	No	No	No
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	Less than Significant with Mitigation Incorporated	No	No	No	Yes
c) Disturb any human remains, including those interred outside of formal cemeteries?	Not Analyzed in the Certified EIS/EIR	No	No	No	No

Impact Determination in the Certified EIS/EIR

Impacts to Cultural Resources are discussed in Section 5.5, Cultural Resources of the Certified EIS/EIR. The Certified EIS/EIR concluded that impacts associated with thresholds (b) would be less than significant with mitigation incorporated and no impact associated with threshold (a) would occur. The Certified EIS/EIR did not provide analysis for threshold (c).

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The proposed modifications to the Approved Project are limited to adding the additional offshore borrow area for obtaining sand for placement at the San Clemente Beach. Cultural resource identification efforts within the proposed Surfside-Sunset borrow site included consultation of the

National Oceanic and Atmospheric Administration’s (NOAA) Automated Wreck and Obstruction Information System (AWOIS) and remote sensing surveys of the proposed borrow site (USACE, 2024b). The AWOIS determined that no shipwrecks or other submerged historic resources were plotted within the proposed Surfside-Sunset borrow site (USACE, 2024b). A hydrographic underwater survey of the proposed borrow site was conducted by USACE in 2017 and the survey data identified no anomalies that could be shipwrecks or other submerged historic resources on the seafloor (USACE, 2024b). Therefore, the Modified Project would result in no impact to historical resources or human remains (including those interred outside of formal cemeteries) set forth in thresholds (a) and (c) above. Furthermore, the Modified Project would also continue to implement the mitigation measures included in the Certified EIS/EIR, as applicable. Thus, as with the Approved Project, impacts related to Cultural Resources set forth in thresholds (b) above would be less than significant. Therefore, the Modified Project would not create any new significant impacts related to Cultural Resources nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the scope of impacts set forth in the Certified EIS/EIR.

Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?

There are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the Certified EIS/EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to Cultural Resources. No substantial changes in the environment have occurred since certification of the Certified EIS/EIR, and no substantial new impacts related to Cultural Resources have been identified that would result in new or more severe significant environmental impacts. As determined above, the Modified Project would not result in any new or substantially more severe impacts related to Cultural Resources, and a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impact

The Adopted MMRP in **Appendix A** includes mitigation measures and Environmental Monitoring Commitments. Mitigation measures MM-CR-50-1 and MM-CR-50-2 would be implemented to mitigate impacts to Cultural Resources. See **Appendix A** for a full description of the Cultural Resources mitigation measures. As noted above, underwater remote sensing surveys were completed for the proposed Surfside-Sunset borrow site by USACE in 2017, therefore Modified Project complies with the underwater remote sensing survey required by the first half of MM-CR-50-2. The second half of MM-CR-50-2 would continue to be implemented by the Modified Project (compliance with Section 106 of the National Register of Historic Places and its implementing regulations at 36 CFR 800, as amended).

Conclusion

No new significant environmental impacts to Cultural Resources would occur as a result of the Modified Project. Therefore, the impacts to Cultural Resources do not require a subsequent or supplemental EIR pursuant to PCR, Section 21166(c) or the State CEQA Guidelines, Sections 15162 or 15163.

VI. ENERGY

Environmental Issue Area	Impact Determination in the Certified EIS/EIR?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIS/EIR's Mitigation Measures Addressing Impact
VI. Energy. Would the Modified Project:					
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Not Analyzed in the Certified EIS/EIR	No	No	No	No
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	Not Analyzed in the Certified EIS/EIR	No	No	No	No

Impact Determination in the Certified EIS/EIR

Impacts to Energy were discussed in Section 8.5 Energy Requirements and Conservation Potential of Alternatives and Mitigation of the Certified EIS/EIR in accordance with State CEQA Guidelines Appendix F. The Certified EIS/EIR concluded that energy impacts would be less than significant, and the proposed Project would implement several mitigation measures that would reduce inefficient, wasteful, and unnecessary consumption of energy. The 2011 State CEQA Guidelines Appendix G did not include energy checklist questions and thus the specific energy checklist questions were not analyzed in the certified EIS/EIR.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The proposed modifications to the Approved Project are limited to adding the additional offshore borrow area for obtaining sand for placement at the San Clemente Beach. The Modified Project would not result in a significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, as it is needed to due to operational challenges the USACE construction contractor is encountering at the approved offshore Oceanside borrow area. The Modified Project would not increase the number of dredging and beach fill episodes or the onshore construction activities, thus, as with the Approved Project, impacts related to Energy

would be less than significant under the Modified Project. No state or local plans for renewable energy or energy efficiency apply to the Modified Project. Therefore, the Modified Project would not create any new significant impacts related to Energy nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the scope of impacts set forth in the Certified EIS/EIR.

Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?

There are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the Certified EIS/EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to Energy. No substantial changes in the environment have occurred since certification of the Certified EIS/EIR, and no substantial new impacts related to Energy have been identified that would result in new or more severe significant environmental impacts. As determined above, the Modified Project would not result in any new or substantially more severe impacts related to Energy, and a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impact

None.

Conclusion

No new or more severe significant environmental impacts to Energy would occur as a result of the Modified Project. Therefore, the impacts to Energy do not require a subsequent or supplemental EIR pursuant to PCR, Section 21166(c) or the State CEQA Guidelines, Sections 15162 or 15163.

VII. GEOLOGY AND SOILS

Environmental Issue Area	Impact Determination in the Certified EIS/EIR?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIS/EIR's Mitigation Measures Addressing Impact
VII. Geology and Soils. Would the Modified Project:					
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	Not Analyzed in the Certified EIS/EIR	No	No	No	No
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	Not Analyzed in the Certified EIS/EIR	No	No	No	No
ii) Strong seismic ground shaking?	Not Analyzed in the Certified EIS/EIR	No	No	No	No
iii) Seismic-related ground failure, including liquefaction?	Not Analyzed in the Certified EIS/EIR	No	No	No	No
iv) Landslides?	Not Analyzed in the Certified EIS/EIR	No	No	No	No
b) Result in substantial soil erosion or the loss of topsoil?	Less than Significant	No	No	No	No
c) Be located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	Not Analyzed in the Certified EIS/EIR	No	No	No	No
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	Not Analyzed in the Certified EIS/EIR	No	No	No	No

Environmental Issue Area	Impact Determination in the Certified EIS/EIR?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIS/EIR's Mitigation Measures Addressing Impact
VII. Geology and Soils. Would the Modified Project:					
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	Not Analyzed in the Certified EIS/EIR	No	No	No	No
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Less than Significant	No	No	No	No

Impact Determination in the Certified EIS/EIR

Impacts to Geology and Soils are discussed in Section 5.2, Geology and Topography of the Certified EIS/EIR. The Certified EIS/EIR concluded that impacts associated with thresholds (b) and (f) would be less than significant. The Certified EIS/EIR did not provide analysis for thresholds (a)(i)-(a)(iv), (c), (d) and (e).

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Modified Project would use an additional offshore borrow site for obtaining dredge material to nourish and protect the beach at San Clemente. The proposed Surfside-Sunset borrow site is located approximately one mile offshore away from the nearest coastline. Due to the nature of the Modified Project, there would be no impacts related to earthquake faults, liquefaction, landslides, lateral spreading, subsidence, collapse, expansive soils, septic tanks, or alternative wastewater disposal systems set forth in thresholds (a), (c), (d) and (e) above. The Modified Project is intended to significantly reduce the erosion occurring in San Clemente and the use of an additional offshore borrow site would not contribute to any nearby beach erosion. Thus, as with the Approved Project, impacts related to Geology and Soils set forth in threshold (b) above would be less than significant under the Modified Project. There are no known unique paleontological resources or sites or unique geologic features at the Surfside-Sunset borrow site, thus, as with the Approved Project, impacts related to Geology and Soils set forth in threshold (f) above would be less than significant under the Modified Project. Therefore, the Modified Project would not create any new significant impacts related to Geology and Soils nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the scope of impacts set forth in the Certified EIS/EIR.

Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?

There are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the Certified EIS/EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to Geology and Soils. No substantial changes in the environment have occurred since certification of the Certified EIS/EIR, and no substantial new impacts related to Geology and Soils have been identified that would result in new or more severe significant environmental impacts. As determined above, the Modified Project would not result in any new or substantially more severe impacts related to Geology and Soils, and a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impact

None.

Conclusion

No new or more severe significant environmental impacts to Geology and Soils would occur as a result of the Modified Project. Therefore, the impacts to Geology and Soils do not require a subsequent or supplemental EIR pursuant to PCR, Section 21166(c) or the State CEQA Guidelines, Sections 15162 or 15163.

VIII. GREENHOUSE GAS EMISSIONS

Environmental Issue Area	Impact Determination in the Certified EIS/EIR?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIS/EIR's Mitigation Measures Addressing Impact
VIII. Greenhouse Gas Emissions. Would the Modified Project:					
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less than Significant	No	No	No	No
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	Less than Significant	No	No	No	No

Impact Determination in the Certified EIS/EIR

Impacts to Greenhouse Gas (GHG) Emissions are discussed in Section 5.1, Air Quality and Meteorology of the Certified EIS/EIR. The Certified EIS/EIR concluded that GHG emissions impacts would be less than significant.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The proposed modifications to the Approved Project are limited to adding the additional offshore borrow area for obtaining sand for placement at the San Clemente Beach. **Table 2** displays the net dredge GHG emissions under the Modified Project as a result of dredging at the Surfside-Sunset borrow site (See **Appendix B** – Air Quality Analysis for more details).

Table 2: Surfside-Sunset Borrow Site Net Dredge GHG Emissions (metric tons CO₂)

Daily GHG Emissions (metric tons CO ₂)		Annual GHG Emissions (metric tons CO ₂)	
Certified EIS/EIR	45	Certified EIS/EIR	2,054
Surfside-Sunset	37	Surfside-Sunset	967
Net Daily GHG Emissions	-7	Net Annual GHG Emissions	-1,087

Note: (1) The negative values indicate an emissions reduction. This is because the dredge to be used has a cleaner engine, uses lower carbon fuels, and has lower emission factors than what was assumed in the Certified EIS/EIR due to recent regulatory requirements.

(2) Since the Modified Project only involves a new borrow site, all other aspects of the Project including onshore emission sources remain unchanged from what was analyzed in the Certified EIS/EIR.

As detailed in **Table 2** and **Appendix B**, the use of the Surfside-Sunset borrow site would result in a GHG emissions reduction for both daily and annual scenarios compared to the Oceanside borrow site analyzed in the Certified EIS/EIR. The Modified Project would not increase the number of dredging and beach fill episodes or the onshore construction activities, thus, as with the Approved Project, impacts related to GHG emissions would be less than significant under the Modified Project. As a temporary and intermittent construction project, there are no applicable significance thresholds nor is there an applicable local or Climate Action Plan. State regulations, plans and policies adopted for the purpose of reducing GHG emissions would continue to be implemented and the Modified Project would be required to comply, as applicable. Therefore, the Modified Project would not create any new significant impacts related to GHG emissions nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the scope of impacts set forth in the Certified EIS/EIR.

Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?

There are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the Certified EIS/EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to GHG emissions. No substantial changes in the environment have occurred since certification of the Certified EIS/EIR, and no substantial new impacts related to GHG Emissions have been identified that would result in new or more severe significant environmental impacts. As determined above, the Modified Project would not result in any new or substantially more severe impacts related to GHG Emissions, and a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impact

None.

Conclusion

No new or more severe significant environmental impacts to GHG Emissions would occur as a result of the Modified Project. Therefore, the impacts to GHG Emissions do not require a subsequent or supplemental EIR pursuant to PCR, Section 21166(c) or the State CEQA Guidelines, Sections 15162 or 15163.

IX. HAZARDS AND HAZARDOUS MATERIALS

Environmental Issue Area	Impact Determination in the Certified EIS/EIR?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIS/EIR's Mitigation Measures Addressing Impact
IX. Hazards and Hazardous Materials. Would the Modified Project:					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Not Analyzed in the Certified EIS/EIR	No	No	No	No
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Not Analyzed in the Certified EIS/EIR	No	No	No	No
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Not Analyzed in the Certified EIS/EIR	No	No	No	No
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Not Analyzed in the Certified EIS/EIR	No	No	No	No
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	Not Analyzed in the Certified EIS/EIR	No	No	No	No
f) Impair implementation of or physically interfere with an adopted emergency response plan	Not Analyzed in the Certified EIS/EIR	No	No	No	No

Environmental Issue Area	Impact Determination in the Certified EIS/EIR?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIS/EIR's Mitigation Measures Addressing Impact
IX. Hazards and Hazardous Materials. Would the Modified Project:					
or emergency evacuation plan?					

Impact Determination in the Certified EIS/EIR

Impacts to Hazards and Hazardous Materials were not analyzed in the Certified EIS/EIR.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The routine transport, disposal, use, handling, storage, and accidental release of hazardous materials would comply with all applicable federal, State, and local laws regulating hazardous materials under the Modified Project. The Certified EIS/EIR states that impacts related to the introduction of fuels or other contaminants to marine waters would be reduced to less-than-significant through adherence to a Stormwater Pollution Prevention Plan (SWPPP) and an Oil Spill Prevention and Response Plan (OSPRP) (See page 5-24 and 5-25 of the Certified EIS/EIR). Impacts related to the routine transport, disposal, use, handling, storage, and accidental release set forth in thresholds (a) and (b) above would be less than significant under the Modified Project because adherence to the SWPPP and OSPRP would reduce potentially significant impacts from any accidental release of hazardous materials on the beach or into marine waters. The offshore borrow site at Surfside-Sunset is not located within a quarter-mile radius of a school nor within two miles of an airport. The offshore borrow site at Surfside-Sunset is not located on a materials site pursuant to Government Code Section 65962.5 (DTSC, 2024; SWRCB, 2024). The Modified Project would not impair or physically interfere with an adopted emergency response/evacuation plan because the Modified Project would only add the use of the Surfside-Sunset borrow site, which is one mile offshore. Thus, the Modified Project would have no impacts related to Hazards and Hazardous Materials set forth in thresholds (c) through (f) above. Therefore, the Modified Project would not create any new significant impacts related to Hazards and Hazardous Materials.

Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?

There are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the Certified EIS/EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to Hazards and Hazardous Materials. No substantial changes in the environment have occurred since

certification of the Certified EIS/EIR, and no substantial new impacts related to Hazards and Hazardous Materials have been identified that would result in new or more severe significant environmental impacts. As determined above, the Modified Project would not result in any new or substantially more severe impacts related to Hazards and Hazardous Materials, and a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impact

None.

Conclusion

No new or more severe significant environmental impacts to Hazards and Hazardous Materials would occur as a result of the Modified Project. Therefore, the impacts to Hazards and Hazardous Materials do not require a subsequent or supplemental EIS/EIR pursuant to PCR, Section 21166(c) or the State CEQA Guidelines, Sections 15162 or 15163.

X. HYDROLOGY AND WATER QUALITY

Environmental Issue Area	Impact Determination in the Certified EIS/EIR?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIS/EIR's Mitigation Measures Addressing Impact
X. Hydrology and Water Quality. Would the Modified Project:					
a) Violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or groundwater quality?	Less than Significant with Mitigation Incorporated	No	No	No	Yes
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Not Analyzed in the Certified EIS/EIR	No	No	No	No
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:	Not Analyzed in the Certified EIS/EIR	No	No	No	No
i) result in substantial erosion or siltation on- or off-site;	Less than Significant	No	No	No	No
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	Not Analyzed in the Certified EIS/EIR	No	No	No	No
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	Not Analyzed in the Certified EIS/EIR	No	No	No	No
iv) Impede or redirect flood flows?	Not Analyzed in the Certified EIS/EIR	No	No	No	No
d) In flood hazard, tsunami, or seiche zones, risk	Not Analyzed in the Certified EIS/EIR	No	No	No	No

Environmental Issue Area	Impact Determination in the Certified EIS/EIR?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIS/EIR's Mitigation Measures Addressing Impact
X. Hydrology and Water Quality. Would the Modified Project:					
release of pollutants due to project inundation?					
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Less than Significant with Mitigation Incorporated	No	No	No	Yes

Impact Determination in the Certified EIS/EIR

Impacts to Hydrology and Water Quality are discussed in Section 5.3, Water Resources (Water Quality, Sediments, and Oceanography) of the Certified EIS/EIR. The Certified EIS/EIR concluded that impacts associated with thresholds (a) and (e) would be less than significant with mitigation incorporated and impacts to threshold (c)(i) would be less than significant. The Certified EIS/EIR did not provide any analysis for thresholds (b), (c)(ii)-(c)(iv), and (d).

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Surfside-Sunset borrow site is located approximately one mile offshore from the nearest coastline, thus there are no nearby groundwater supplies, streams, or rivers near the offshore borrow site. Therefore, there would be no impacts related to groundwater supplies, drainage patterns of a stream or river, surface runoff, flood flows, or inundation set forth in thresholds (b), (c)(ii)-(c)(iv) and (d) above. The Modified Project would continue to implement the mitigation measures included in the Certified EIS/EIR, which include a SWPPP and OSPRP to avoid introducing contaminants to marine waters and a turbidity monitoring plan to ensure significant plumes of turbidity are reduced during dredging and beach fill operations. Therefore, the Modified Project would not violate any water quality standards or conflict with or obstruct implementation of a water quality control plan when dredging and beach construction activities commence. As discussed above, since the Modified Project is intended to significantly reduce the erosion occurring in San Clemente, the Modified Project would not result in nearby coastal shoreline erosion. Thus, as with the Approved Project, impacts related to Hydrology and Water Quality set forth in thresholds (a), (c)(i) and (e) above would be less than significant under the Modified Project. Therefore, the Modified Project would not create any new significant impacts related to Hydrology and Water Quality nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the scope of impacts set forth in the Certified EIS/EIR.

Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?

There are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the Certified EIS/EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to Hydrology and Water Quality. No substantial changes in the environment have occurred since certification of the Certified EIS/EIR, and no substantial new impacts related to Hydrology and Water Quality have been identified that would result in new or more severe significant environmental impacts. As determined above, the Modified Project would not result in any new or substantially more severe impacts related to Hydrology and Water Quality, and a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impact

The Adopted MMRP in **Appendix A** includes mitigation measures and Environmental Monitoring Commitments. Mitigation measures MM-WR-50-1.1 and MM-WR-50-1.2 would be implemented to mitigate impacts to Hydrology and Water Quality. See **Appendix A** for a full description of the Hydrology and Water Quality mitigation measures.

Conclusion

No new or more severe significant environmental impacts to Hydrology and Water Quality would occur as a result of the Modified Project. Therefore, the impacts to Hydrology and Water Quality do not require a subsequent or supplemental EIR pursuant to PCR, Section 21166(c) or the State CEQA Guidelines, Sections 15162 or 15163.

XI. LAND USE AND PLANNING

Environmental Issue Area	Impact Determination in the Certified EIS/EIR?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIS/EIR's Mitigation Measures Addressing Impact
XI. Land Use and Planning. Would the Modified Project:					
a) Physically divide an established community (including a low-income or minority community)?	No Impact	No	No	No	No
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	No Impact	No	No	No	No

Impact Determination in the Certified EIS/EIR

Impacts to Land Use and Planning are discussed in Section 5.7, Land Use and Policy of the Certified EIS/EIR. The Certified EIS/EIR concluded that no impacts associated with thresholds (a) and (b) would occur.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Modified Project involves the use of an additional offshore borrow site. The Modified Project would not physically divide an established community, nor would it conflict with any applicable land use plan, policy, or regulations. Thus, as with the Approved Project, there would be no impacts related to Land Use and Policy set forth in thresholds (a) and (b) under the Modified Project. Therefore, the Modified Project would not create any new significant impacts related to Land Use and Planning nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the scope of impacts set forth in the Certified EIS/EIR.

Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?

There are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the Certified EIS/EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to Land Use and Planning. No substantial changes in the environment have occurred since certification of the Certified EIS/EIR, and no substantial new impacts related to Land Use and Planning have been identified that would result in new or more severe significant environmental impacts. As determined above, the Modified Project would not result in any new or substantially more severe impacts related to Land Use and Planning, and a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impact

None.

Conclusion

No new or more severe significant environmental impacts to Land Use and Planning would occur as a result of the Modified Project. Therefore, the impacts to Land Use and Planning do not require a subsequent or supplemental EIR pursuant to PCR, Section 21166(c) or the State CEQA Guidelines, Sections 15162 or 15163.

XII. MINERAL RESOURCES

Environmental Issue Area	Impact Determination in the Certified EIS/EIR?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIS/EIR's Mitigation Measures Addressing Impact
XII. Mineral Resources. Would the Modified Project:					
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	Not Analyzed in the Certified EIS/EIR	No	No	No	No
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	Not Analyzed in the Certified EIS/EIR	No	No	No	No

Impact Determination in the Certified EIS/EIR

Impacts to Mineral Resources were not analyzed in the Certified EIS/EIR.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Modified Project would use an additional offshore borrow site for obtaining dredge material to protect and nourish the beach at San Clemente. The Modified Project would not result in the loss of a known mineral known to be of value to the region or residents of the state because no known minerals exist within the Surfside-Sunset borrow site, and even if valuable minerals were found to be present, they would only be moved to San Clemente Beach and made more available than if they remained one mile offshore. The Modified Project would not result in the loss of a locally important mineral resource delineated on a local general plan, specific plan, or other land use plan as no such plans exist for the Surfside-Sunset borrow site. Thus, the Modified Project would have no impact related to Mineral Resources set forth in thresholds (a) and (b) above. Therefore, the Modified Project would not create any new significant impacts related to Mineral Resources.

Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?

There are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the Certified EIS/EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to Mineral Resources. No substantial changes in the environment have occurred since certification of the Certified EIS/EIR, and no substantial new impacts related to Mineral Resources have been identified that would result in new or more severe significant environmental impacts. As determined above, the Modified Project would not result in any new or substantially more severe impacts related to Mineral Resources, and a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impact

None.

Conclusion

No new or more severe significant environmental impacts to Mineral Resources would occur as a result of the Modified Project. Therefore, the impacts to Mineral Resources do not require a subsequent or supplemental EIR pursuant to PCR, Section 21166(c) or the State CEQA Guidelines, Sections 15162 or 15163.

XIII. NOISE AND VIBRATION

Environmental Issue Area	Impact Determination in the Certified EIS/EIR?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIS/EIR's Mitigation Measures Addressing Impact
XIII. Noise. Would the Modified Project result in:					
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Less than Significant with Mitigation Incorporated	No	No	No	Yes
b) Generation of excessive groundborne vibration or groundborne noise levels?	Less than Significant	No	No	No	No
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	No Impact	No	No	No	No

Impact Determination in the Certified EIS/EIR

Impacts to Noise and Vibration are discussed in Section 5.8, Noise of the Certified EIS/EIR. The Certified EIS/EIR concluded that impacts associated with threshold (a) would be less than significant with mitigation incorporated, impacts associated with threshold (b) would be less than significant, and that no impact would occur to threshold (c).

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

As discussed above, the Surfside-Sunset borrow site is located approximately one mile offshore. Noise and vibration impacts from the Modified Project would be negligible at the proposed Surfside-Sunset borrow area due to the distance from noise-sensitive receptors. The Modified Project would continue to implement the mitigation measures included in the Certified EIS/EIR. Therefore, the Modified Project would not expose persons to noise levels in excess of applicable noise standards nor result in generation of excessive groundborne vibration. Thus, as with the Approved Project, impacts related to Noise and Vibration set forth in thresholds (a) and (b) above

would be less than significant, and no impacts would occur under threshold (c) under the Modified Project. Therefore, the Modified Project would not create any new significant impacts related to Noise and Vibration nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the scope of impacts set forth in the Certified EIS/EIR.

Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?

There are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the Certified EIS/EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to Noise and Vibration. No substantial changes in the environment have occurred since certification of the Certified EIS/EIR, and no substantial new impacts related to Noise and Vibration have been identified that would result in new or more severe significant environmental impacts. As determined above, the Modified Project would not result in any new or substantially more severe impacts related to Noise and Vibration, and a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impact

The MMRP in **Appendix A** includes mitigation measures and Environmental Monitoring Commitments. Mitigation measure MM-N-50-3.1 would be implemented to mitigate impacts to Noise. See **Appendix A** for a full description of the Noise mitigation measure.

Conclusion

No new or more severe significant environmental impacts to Noise and Vibration would occur as a result of the Modified Project. Therefore, the impacts to Noise and Vibration do not require a subsequent or supplemental EIR pursuant to PCR, Section 21166(c) or the State CEQA Guidelines, Sections 15162 or 15163.

XIV. POPULATION AND HOUSING

Environmental Issue Area	Impact Determination in the Certified EIS/EIR?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIS/EIR's Mitigation Measures Addressing Impact
XIV. Population and Housing. Would the Modified Project:					
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	Not Analyzed in the Certified EIS/EIR	No	No	No	No
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	Not Analyzed in the Certified EIS/EIR	No	No	No	No

Impact Determination in the Certified EIS/EIR

Impacts to Population and Housing were not analyzed in the Certified EIS/EIR.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Modified Project would only protect and nourish the existing San Clemente Beach and would not directly or indirectly result in population growth or displace housing. Thus, the Modified Project would have no impact related to Population and Housing set forth in thresholds (a) and (b) above. Therefore, the Modified Project would not create any new significant impacts related to Population and Housing.

Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?

There are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the Certified EIS/EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to Population and Housing. No substantial changes in the environment have occurred since certification of the Certified EIS/EIR, and no substantial new impacts related to Population and Housing have been identified that would result in new or more severe significant environmental

impacts. As determined above, the Modified Project would not result in any new or substantially more severe impacts related to Population and Housing, and a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impact

None.

Conclusion

No new or more severe significant environmental impacts to Population and Housing would occur as a result of the Modified Project. Therefore, the impacts to Population and Housing do not require a subsequent or supplemental EIR pursuant to PCR, Section 21166(c) or the State CEQA Guidelines, Sections 15162 or 15163.

XV. PUBLIC SERVICES

Environmental Issue Area	Impact Determination in the Certified EIS/EIR?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIS/EIR's Mitigation Measures Addressing Impact
XV. Public Services.					
a) Would the Modified Project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:					
Fire protection?	No Impact	No	No	No	No
Police protection?	No Impact	No	No	No	No
Schools?	No Impact	No	No	No	No
Parks?	No Impact	No	No	No	No
Other public facilities, including roads?	No Impact	No	No	No	No

Impact Determination in the Certified EIS/EIR

Impacts to Public Services are discussed in Section 5.11, Public Health and Safety of the Certified EIS/EIR. The Certified EIS/EIR concluded that impacts associated with threshold (a) would be no impact.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Modified Project would only protect and nourish the existing San Clemente Beach and would not warrant the need for new or physically altered governmental facilities to maintain acceptable service ratios, response times, or other performance objectives. The Modified Project would not result in impacts to fire protection, police protection, schools, parks, or other public facilities as the Modified Project would only add an additional borrow site (Surfside-Sunset) that is one mile offshore and these temporary and intermittent borrow site activities would have no impact on these public services. Thus, as with the Approved Project, there would be no impacts related to Public Services set forth in threshold (a) above under the Modified Project. Therefore, the Modified Project would not create any new significant impacts related to Public Services nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the scope of impacts set forth in the Certified EIS/EIR.

Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?

There are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the Certified EIS/EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to Public Services. No substantial changes in the environment have occurred since certification of the Certified EIS/EIR, and no substantial new impacts related to Public Services have been identified that would result in new or more severe significant environmental impacts. As determined above, the Modified Project would not result in any new or substantially more severe impacts related to Public Services, and a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impact

None.

Conclusion

No new or more severe significant environmental impacts to Public Services would occur as a result of the Modified Project. Therefore, the impacts to Public Services do not require a subsequent or supplemental EIR pursuant to PCR, Section 21166(c) or the State CEQA Guidelines, Sections 15162 or 15163.

XVI. RECREATION

Environmental Issue Area	Impact Determination in the Certified EIS/EIR?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIS/EIR's Mitigation Measures Addressing Impact
XVI. Recreation.					
a) Would the Modified Project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Less than Significant with Mitigation Incorporated	No	No	No	Yes
b) Does the Modified Project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Less than Significant	No	No	No	No

Impact Determination in the Certified EIS/EIR

Impacts to Recreation are discussed in Section 5.9, Recreation of the Certified EIS/EIR. The Certified EIS/EIR concluded that impacts associated with threshold (a) would be less than significant with mitigation incorporated and impacts associated with threshold (b) would be less than significant.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Modified Project would not increase the use of existing parks or recreational facilities. The Modified Project would continue to implement the mitigation measures included in the Certified EIS/EIR, which entails providing signs to warn swimmers, waders and surfers of potentially hazardous surf conditions as well as providing extra lifeguards for the safety of recreational beach users. Thus, as with the Approved Project, impacts related to Recreation forth in thresholds (a) through (b) above would be less than significant with mitigation under the Modified Project. Therefore, the Modified Project would not create any new significant impacts related to Recreation nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the scope of impacts set forth in the Certified EIS/EIR.

Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?

There are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the Certified EIS/EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to Recreation. No substantial changes in the environment have occurred since certification of the Certified EIS/EIR, and no substantial new impacts related to Recreation have been identified that would result in new or more severe significant environmental impacts. As determined above, the Modified Project would not result in any new or substantially more severe impacts related to Recreation, and a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impact

The Adopted MMRP in **Appendix A** includes mitigation measures and Environmental Monitoring Commitments. Mitigation measure MM-REC-50-4.1 would be implemented to mitigate impacts to Recreation. See **Appendix A** for a full description of the Recreation mitigation measure.

Conclusion

No new or more severe significant environmental impacts to Recreation would occur as a result of the Modified Project. Therefore, the impacts to Recreation do not require a subsequent or supplemental EIR pursuant to PCR, Section 21166(c) or the State CEQA Guidelines, Sections 15162 or 15163.

XVII. TRANSPORTATION/TRAFFIC

Environmental Issue Area	Impact Determination in the Certified EIS/EIR?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIS/EIR's Mitigation Measures Addressing Impact
XVII. Transportation/Traffic. Would the Modified Project:					
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Less than Significant	No	No	No	No
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	Not Analyzed in the Certified EIS/EIR	No	No	No	No
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	No Impact	No	No	No	No
d) Result in inadequate emergency access?	Less than Significant	No	No	No	No

Impact Determination in the Certified EIS/EIR

Impacts to Transportation/Traffic are discussed in Section 5.6, Ground and Vessel Transportation of the Certified EIS/EIR. The Certified EIS/EIR concluded that impacts associated with thresholds (a) and (d) would result in a less-than-significant impact and no impacts would occur with threshold (c). The Certified EIS/EIR did not provide any analysis for threshold (b) because it was not listed in the 2011 State CEQA Guidelines Appendix G.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Modified Project would continue to give proper advanced notice to mariners during dredging and nourishment operations to reduce any potential impacts to navigational traffic in the ocean. The Modified Project would not increase the truck traffic associated with construction workers traveling to and from the Project site. The Modified Project would not increase hazards due to a design feature nor would it result in inadequate emergency access. Thus, as with the Approved Project, impacts related to Transportation/Traffic set forth in thresholds (a) and (d) above would be less than significant and no impact would occur to threshold (c) under the Modified Project. Threshold b) would not apply to the Modified Project as there would be no increase in automobile vehicle miles traveled with the Modified Project. Therefore, the Modified Project would not

create any new significant impacts related to Transportation/Traffic nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the scope of impacts set forth in the Certified EIS/EIR.

Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?

There are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the Certified EIS/EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to Transportation/Traffic. No substantial changes in the environment have occurred since certification of the Certified EIS/EIR, and no substantial new impacts related to Transportation/Traffic have been identified that would result in new or more severe significant environmental impacts. As determined above, the Modified Project would not result in any new or substantially more severe impacts related to Transportation/Traffic, and a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impact

None.

Conclusion

No new or more severe significant environmental impacts to Transportation/Traffic would occur as a result of the Modified Project. Therefore, the impacts to Transportation/Traffic do not require a subsequent or supplemental EIR pursuant to PCR, Section 21166(c) or the State CEQA Guidelines, Sections 15162 or 15163.

XVIII. TRIBAL CULTURAL RESOURCES

Environmental Issue Area	Impact Determination in the Certified EIS/EIR?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIS/EIR's Mitigation Measures Addressing Impact
XVIII. Tribal Cultural Resources. Would the Project:					
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:					
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)?	Not Analyzed in the Certified EIS/EIR	No	No	No	No
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	Not Analyzed in the Certified EIS/EIR	No	No	No	No

Impact Determination in the Certified EIS/EIR

Impacts to Tribal Cultural Resources were not analyzed in the Certified EIS/EIR. Tribal Cultural Resources was not an impact area listed in the 2011 State CEQA Guidelines Appendix G.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

Because there is no Notice of Preparation (NOP) or Notice of Intent (NOI) required for the Modified Project, Assembly Bill (AB) 52 does not apply to the Modified Project. As discussed in Section V above, no impacts to historical resources are anticipated from the Modified Project due to the absence of submerged historic resources. USACE sent a letter to the Office of Historic Preservation (OHP) to inform them that USACE is continuing consultation with the OHP under the National Historic Preservation Act (NHPA) for the Modified Project and that USACE also sent new consultation letters regarding the Modified Project to all previously consulted Tribal representatives in February 2024 (USACE, 2024c). In addition, the letter from the USACE to the OHP states that if any post-review discoveries are encountered, Project activities within 50 feet will cease, and the Corps Navigation and Coastal Branch and Corps Archaeologist will be notified. Post-review discoveries will be treated and evaluated in accordance with the regulations set forth in 36 CFR 800.13(b)(3) (USACE, 2024c). Therefore, the Modified Project would result in no impacts to Tribal Cultural Resources set forth in thresholds (a)(i) and (a)(ii) above. Furthermore, the Modified Project would also continue to implement the mitigation measures included in the Certified EIS/EIR, as applicable. Therefore, the Modified Project would not create any new significant impacts related to Tribal Cultural Resources nor result in a substantial increase in a previously identified significant impact. Such impacts would be within the scope of impacts set forth in the Certified EIS/EIR.

Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?

There are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the Certified EIS/EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to Tribal Cultural Resources. No substantial changes in the environment have occurred since certification of the Certified EIS/EIR, and no substantial new impacts related to Tribal Cultural Resources have been identified that would result in new or more severe significant environmental impacts. As determined above, the Modified Project would not result in any new or substantially more severe impacts related to Tribal Cultural Resources, and a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impact

The Adopted MMRP in **Appendix A** includes mitigation measures and Environmental Monitoring Commitments. Mitigation measures MM-CR-50-1 and MM-CR-50-2 would be implemented to mitigate impacts to Cultural Resources. See **Appendix A** for a full description of the Cultural Resources mitigation measures.

Conclusion

No new or more severe significant environmental impacts to Tribal Cultural Resources would occur as a result of the Modified Project. Therefore, the impacts to Tribal Cultural Resources do not require a subsequent or supplemental EIR pursuant to PCR, Section 21166(c) or the State CEQA Guidelines, Sections 15162 or 15163.

XIX. UTILITIES AND SERVICE SYSTEMS

Environmental Issue Area	Impact Determination in the Certified EIS/EIR?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIS/EIR's Mitigation Measures Addressing Impact
XIX. Utilities and Service Systems. Would the Modified Project:					
a) Require or result in the relocation or construction of new or expanded water, wastewater or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Not Analyzed in the Certified EIS/EIR	No	No	No	No
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	Not Analyzed in the Certified EIS/EIR	No	No	No	No
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Not Analyzed in the Certified EIS/EIR	No	No	No	No
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Not Analyzed in the Certified EIS/EIR	No	No	No	No
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Not Analyzed in the Certified EIS/EIR	No	No	No	No

Impact Determination in the Certified EIS/EIR

Impacts to Utilities and Service Systems were not analyzed in the Certified EIS/EIR.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The Modified Project would have no impacts to on shore facilities related to water, wastewater, stormwater, electric power, natural gas, solid waste or communication or applicable solid waste regulations set forth in thresholds (a) through (e) above as the only change associated with the Modified Project is a new offshore borrow site. Therefore, the Modified Project would not create any new significant impacts related to Utilities and Service Systems.

Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?

There are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the Certified EIS/EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to Utilities and Service Systems. No substantial changes in the environment have occurred since certification of the Certified EIS/EIR, and no substantial new impacts related to Utilities and Service Systems have been identified that would result in new or more severe significant environmental impacts. As determined above, the Modified Project would not result in any new or substantially more severe impacts related to Utilities and Service Systems, and a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impact

None.

Conclusion

No new or more severe significant environmental impacts to Utilities and Service Systems would occur as a result of the Modified Project. Therefore, the impacts to Utilities and Service Systems do not require a subsequent or supplemental EIR pursuant to PCR, Section 21166(c) or the State CEQA Guidelines, Sections 15162 or 15163.

XX. WILDFIRE

Environmental Issue Area	Impact Determination in the Certified EIS/EIR?	Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?	Any New Circumstances Involving New Significant Impact or Substantially More Severe Impacts?	Any New Information Requiring New Analysis or Verification?	Certified EIS/EIR's Mitigation Measures Addressing Impact
XX. Wildfire. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the Modified Project:					
a) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	Not Analyzed in the Certified EIS/EIR	No	No	No	No
b) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	Not Analyzed in the Certified EIS/EIR	No	No	No	No
c) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	Not Analyzed in the Certified EIS/EIR	No	No	No	No
d) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	Not Analyzed in the Certified EIS/EIR	No	No	No	No

Impact Determination in the Certified EIS/EIR

Impacts to Wildfire were not analyzed in the Certified EIS/EIR. Wildfire was not an impact area listed in the 2011 State CEQA Guidelines Appendix G.

Do Proposed Changes Involve New Significant Impacts or Substantially More Severe Impacts?

The offshore borrow site at Surfside-Sunset is located approximately one mile from the nearest coastline and is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones (CALFIRE, 2024). Due to this, the Modified Project would have no impacts related to Wildfire set forth in thresholds (a) through (d) above. Therefore, the Modified Project would not create any new significant impacts related to Wildfire.

Any New Circumstances Involving New Significant Impacts or Substantially More Severe Impacts?

There are no new circumstances involving new significant impacts or substantially more severe impacts than what was analyzed in the Certified EIS/EIR.

Any New Information Requiring New Analysis or Verification?

There is no new information of substantial importance that has become available relative to Wildfire. No substantial changes in the environment have occurred since certification of the Certified EIS/EIR, and no substantial new impacts related to Wildfire have been identified that would result in new or more severe significant environmental impacts. As determined above, the Modified Project would not result in any new or substantially more severe impacts related to Wildfire, and a review of feasible mitigation measures is not required.

Mitigation Measures Addressing Impact

None.

Conclusion

No new or more severe significant environmental impacts to Wildfire would occur as a result of the Modified Project. Therefore, the impacts to Wildfire do not require a subsequent or supplemental EIR pursuant to PCR, Section 21166(c) or the State CEQA Guidelines, Sections 15162 or 15163.

CUMULATIVE IMPACTS

The Surfside-Sunset Borrow area is currently being utilized by another USACE dredging project. Cumulative impacts that could result from implementation of the Modified Project in conjunction with other dredge activities would consist of extended durations of dredge activity at the site, resulting in greater effects to the benthic community within the borrow site which may require a slightly longer recovery period. However, effects would be temporary, not significant, and substantively consistent with those evaluated in previous environmental documentation, and mitigation measures related to Biological Resources would continue to be implemented under the Adopted MMRP. Thus, no new or more severe significant cumulative impacts to Biological Resources would occur.

The Certified EIS/EIR also concluded that the Approved Project would have significant and unavoidable cumulative Air Quality impacts. As detailed in **Table 1** and **Appendix B**, the use of the Surfside-Sunset borrow site would result in net emissions that would be below the applicable SCAQMD thresholds (and a substantial decrease of emissions in the SDAB). Therefore, no new or more severe significant cumulative impacts to Air Quality would occur.

As the two projects would not utilize the Surfside-Sunset borrow site at the same time and applicable mitigation measures related to Water Quality and Recreation would continue to be implemented under the Adopted MMRP, no new or more severe significant cumulative impacts to Water Quality or Recreation would occur.

As no historic properties or cultural resources are present, no new or more severe significant cumulative impacts to Cultural Resources would occur, and mitigation measures related to Cultural Resources would continue to be implemented under the Adopted MMRP.

Regarding the remaining resource areas, the Modified Project would result in no new or more severe significant cumulative impacts.

As demonstrated by the analysis above, cumulative impacts associated with the Modified Project would be within the scope of impacts set forth in the Certified EIS/EIR. There are no new circumstances involving new significant cumulative impacts or substantially more severe cumulative impacts than what was analyzed in the Certified EIS/EIR. There is no new information of substantial importance that has become available relative to cumulative impacts. No substantial changes in the environment have occurred since certification of the Certified EIS/EIR, and no new cumulative impacts have been identified that would result in new or more severe significant cumulative environmental impacts. As determined above, the Modified Project would not result in any new or substantially more severe cumulative impacts.

CONCLUSIONS

As demonstrated by the analysis above, impacts associated with the Modified Project would be within the scope of impacts set forth in the Certified EIS/EIR. Thus, a new or greater significant impact would not result from the Modified Project. In addition, the mitigation measures that are included in the Certified EIS/EIR in the Adopted MMRP would continue to be implemented under the Modified Project, as applicable. As discussed above, all the impacts from the Modified Project would be within the scope of impacts analyzed in the Certified EIS/EIR, and no additional environmental analysis for the Modified Project is necessary. Furthermore, none of the conditions as described under Sections 15162 and 15163 of the State CEQA Guidelines requiring a subsequent or supplemental EIS/EIR have occurred under the Modified Project. No new significant environmental effects and no substantial increase in the severity of previously identified significant effects would occur as a result of the Modified Project. Additionally, there are no known mitigation measures or project alternatives that were previously considered infeasible but are now considered feasible that would substantially reduce one or more significant effects on the environment identified in the Certified EIS/EIR. Therefore, the Modified Project creates no potential adverse impacts beyond what was evaluated in the Certified EIS/EIR. The preparation of an Addendum that amends the project description in the Certified EIS/EIR to include the Modified Project is appropriate and fully complies with the requirements of the State CEQA Guidelines, sections 15162, 15163 and 15164.

REFERENCES

- California Department of Forestry and Fire Protection (CALFIRE) 2023, *Fire Hazards Severity Zones in State Responsibility Area*, last updated September 29, 2023. Accessed February 15, 2024 at: <https://egis.fire.ca.gov/FHSZ/>
- Department of Toxic Substances Control (DTSC), *EnviroStor*, Accessed February 14, 2024 at: <https://www.envirostor.dtsc.ca.gov/public/>
- State Water Resources Control Board (SWRCB), *Geotracker*, Accessed February 14, 2024 at: <https://geotracker.waterboards.ca.gov/>
- United States Army Corps of Engineers (USACE) 2024a. *San Clemente Shoreline Protection Project Biological Evaluation of Proposed Modification Additional Borrow Area*. February 2024. (Included in the Addendum as **Appendix C**).
- United States Army Corps of Engineers (USACE) 2024b. *Electronic Mail correspondence between USACE and Leslea Meyerhoff, Summit Environmental Group and Daniel Jones, RCH Group regarding the Cultural resource identification efforts at the Surfside-Sunset Borrow Site*. February 20th and 21st, 2024.
- United States Army Corps of Engineers (USACE) 2024c. *Letter from USACE to Ms. Julianne Polanco, State Historic Preservation Office, Office of Historic Preservation regarding the proposed change in the implementation of the on going San Clemente Shoreline Protection Project (COE_2022_1123_001)*. February 7, 2024.

APPENDIX A

ADOPTED MITIGATION MONITORING AND REPORTING PROGRAM (MMRP), JULY 2023

~ DRAFT ~
CITY OF SAN CLEMENTE

**USACE COASTAL STORM DAMAGE REDUCTION PROJECT FINAL EIS/EIR & SEA
MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)**

JULY 2023

Project Name: San Clemente Coastal Storm Damage Reduction Project

Description: The U.S. Army Corps of Engineers (USACE) and the City of San Clemente (City) have prepared a joint Final Feasibility Study and Final Environmental Impact Statement/Environmental Impact Report (FEIS/FEIR) and Supplemental Environmental Assessment and Finding of No Significant Impact (SEA/FONSI) for the Coastal Storm Damage Reduction Project (Project). The FEIS/FEIR evaluates potential options for reducing storm damage related coastal erosion over a 50-year period. The Proposed Project in San Clemente includes construction of a 50-foot-wide beach fill along a 3,412-foot-long stretch of shoreline using 250,000 cubic yards of compatible sediment, with renourishment in same amount every 6 years on average over a 50-year period of Federal participation, for a total of 8 additional nourishments. Material for the beach fills will be dredged from a borrow site located off the coast of San Diego County. Physical monitoring of the performance of the project will be required annually throughout the 50-year period of Federal participation. The Proposed Project would provide coastal storm damage reduction throughout the project areas and would maintain and enhance the existing recreational beach.

Project Location: The project consists of a public beach segment along the San Clemente Shoreline which is 3,412 feet long and borrow site 2A located offshore of Oceanside.

Purpose: The following Mitigation Measure Reporting Program (MMRP) includes Mitigation Measures from the NEPA/CEQA documents as well as other Environmental Monitoring Commitments that are standard operating procedures (SOP) and/or best management practices (BMPs) for such a project and additional project conditions of approval (conditions) and have been incorporated into the Project and are to be implemented before, during, or after construction of the initial fill and renourishment events as required and as noted below in accordance with the FEIS/FEIR and SEA/FONSI. Additional project design features and best management practices, which are not require Mitigation Measures, are also listed in this document in an effort to be as comprehensible as possible.



Mitigation Measure / Monitoring Commitment	Description	Period of Compliance	Date of Compliance	Responsible Party	Reference
SEA / FONSI					
Green Sea Turtle Monitoring	During dredging, transit to and from the Oceanside Borrow Site, and placement of dredged material at the Placement Area, a qualified biologist or qualified monitor with experience monitoring GST will be onboard the hopper dredge to monitor for the presence of GST. The GST monitor will identify and communicate if there is a need to cease or alter operations to avoid impacts to GST. Additional details in Appendix A (Green Sea Turtle Monitoring Program).	Duration of active dredging/ placement activities		USACE and City of San Clemente	2023 SEA/FONSI
Physical Monitoring	Continuing construction monitoring efforts will consist of direct surveys of the beach and seabed morphology. Survey methods will consist of topographic measurements, bathymetric measurements, surf quality observations, and video stereo photogrammetric methods. The monitoring period will begin one year before construction (for the surf quality observations) and continue for the 50- year period of Federal involvement. Beach width measurements shall be obtained from the sub-aerial portion of the beach. Conventional topographic measurements will be obtained of the sub-aerial portion of the beach and bathymetric measurements of the surf zone and seabed morphology will be obtained using conventional acoustic sonar methods. Measurements will be obtained along pre-determined transects that coincide with historical transect locations, and mass points to develop a well- defined terrain model of the littoral system.	Post-construction		USACE and City of San Clemente	IFR (coastal engineering appendix); CZMA (page 8)
California Coastal Commission Federal Consistency Determination Project Conditions					
Grunion Monitoring (if Project extends into Grunion season)	If unanticipated delays result in a time extension of disposal into the grunion season (which is typically March through August), prior to any such sand placement, the USACE will inform the CCC staff, and agree to implement and adhere to the same grunion monitoring measures, mitigation triggers, and mitigation requirements as those adopted by the Commission on June 15, 2011, in its review of the San Diego Association of Governments' (SANDAG's) coastal development permit 6-11-018, Condition No. 8 (Grunions).	If construction extends to March - August		USACE and City of San Clemente	2023 SEA/FONSI (Exhibit 13, Appendix C)

Mitigation Measure / Monitoring Commitment	Description	Period of Compliance	Date of Compliance	Responsible Party	Reference
Final Monitoring Plans	<p>Prior to commencement of construction, the USACE will provide to the CCC Executive Director, for review and concurrence, a copy of the final Preconstruction Engineering and Design (PED) phase surveys and the subsequent monitoring plans, including:</p> <ul style="list-style-type: none"> the final biological (reef/surfgrass) Mitigation and Monitoring Plan (MMRP), including all surveys conducted in preparation of that plan; the surfing monitoring plan; the turbidity monitoring plan; the Stormwater Pollution Prevention Plan (SWPPP); and (e) the Oil Spill Prevention and Response Plan (OSPRP). 	Pre-construction	Complete	USACE and City of San Clemente	2023 SEA/FONSI (Section 5.2)
Biological Resources	<p>The final MMRP shall assure:</p> <ul style="list-style-type: none"> that biological monitoring of all offshore potential impact areas shall be for a minimum of 2 years pre-construction and 2 years post construction; that monitoring and analytical methods are adequate to identify and accurately measure all short- and long-term impacts from the beach nourishment effort; that appropriate mitigation sites are available to address potential impacts; and that the success criteria and analytical methods used are adequate to demonstrate a difference between impact/mitigation site and control sites. <p>Construction shall not commence until the USACE has received written concurrence from the CCC Executive Director that the MMRP satisfies all these criteria.</p>	Pre-construction (2 years) Post-construction (2 years)	Completed 2018-2020	USACE and City of San Clemente	2023 SEA/FONSI (Section 5.2); MMRP
Surf Monitoring	Adequate baseline data collection, including, if feasible, a full year of preconstruction monitoring to determine the baseline condition. Additional details in Appendix B (Surf Monitoring Program).	Pre-construction	Complete	USACE and City of San Clemente	2023 SEA/FONSI (Section 5.2 & Exhibit 15, Appendix C); CZMA (page 8)
Construction Staging Plan	<p>The staging plans will assure:</p> <ul style="list-style-type: none"> that staging will not be permitted on public beaches, within public beach parking lots, or in any other location that would otherwise restrict public access to the beach; and 	Construction		USACE and City of San Clemente	2023 SEA/FONSI (Section 5.2)

Mitigation Measure / Monitoring Commitment	Description	Period of Compliance	Date of Compliance	Responsible Party	Reference
	<ul style="list-style-type: none"> that the minimum number of public parking spaces (on and off-street) that are required for the staging of equipment, machinery and employee parking and that are otherwise necessary to implement the project will be used. 				
Water Resources Plan	<p>The SWPPP will assure that:</p> <ul style="list-style-type: none"> the contractor will not store any construction materials or waste where it will be or could potentially be subject to wave erosion and dispersion; no machinery will be placed, stored or otherwise located in the intertidal zone at any time, except for the minimum necessary to implement the project; construction equipment will not be washed on the beach; where practicable, the contractor will use biodegradable (e.g., vegetable oil-based) lubricants and hydraulic fluids, and/or electric or natural gas-powered equipment; and immediately upon completion of construction and/or when the staging site is no longer needed, the site shall be returned to its preconstruction state. 	Construction		USACE and City of San Clemente	2023 SEA/FONSI (Section 5.2)
On-going Monitoring Reports to CCC	USACE will provide to the CCC Executive Director all monitoring reports, including biological monitoring (including biological mitigation monitoring), surfing monitoring, turbidity, and spill prevention and response monitoring, long-term shoreline monitoring, and cultural resource surveys.	Construction		USACE and City of San Clemente	2023 SEA/FONSI (Section 5.2)
Out-of-kind Mitigation justification to CCC	For any mitigation shown necessary by the post-construction monitoring, USACE will not proceed to implement out-of-kind mitigations (e.g., using kelp habitat to mitigate surfgrass impacts, or providing mid-water habitat to mitigate for shallow water habitat impacts) without showing to the satisfaction of the CCC Executive Director that in-kind mitigation is infeasible. In addition, if out-of-kind mitigation is agreed to and implemented, the mitigation ratio shall be 4:1 (i.e., 4 acres of mitigation for one acre of (impact), and the area measured as the impact area shall be the entire seafloor area (and not, e.g., the acreage of scattered boulders alone).	Construction		USACE and City of San Clemente	2023 SEA/FONSI (Section 5.2)
Renourishment Notification to CCC	USACE will notify the Executive Director prior to any reinitiation (after the first phase) of nourishment, and the USACE shall not implement any such renourishment until the CCC Executive Director has received all of the monitoring reports required by	Pre-construction for future/ subsequent		USACE and City of San Clemente	2023 SEA/FONSI (Section 5.2)

Mitigation Measure / Monitoring Commitment	Description	Period of Compliance	Date of Compliance	Responsible Party	Reference
	that time, reviewed them, and agreed that the biological impacts have been mitigated and affected habitat restored to pre-project conditions.	renourishment events			
RWQCB Section 401 Water Quality Certification Permit Conditions					
Stormwater Management Plan to SDRWQCB	USACE must submit a stormwater management plan for review by the SDRQOCB. The stormwater management plan must include measures for avoiding and minimizing indirect impacts to aquatic resources from Project activities.	Pre-construction (NLT 30 days prior)	In Process	USACE and City of San Clemente	2023 SEA/FONSI (Section 5.2)
Eelgrass Monitoring	A pre-construction eelgrass survey must be completed in accordance with the requirements of the CEMP. If eelgrass identified within 30 ft of project area, USACE must implement best management practices for the protection of eelgrass beds, as described in Attachment 3 of the SDRWQCB Order; and complete a post-construction eelgrass survey, performed by a qualified biologist, within 30 days following the completion of in-water Project activities. The post-construction survey shall be used to quantify and determine mitigation for any losses to eelgrass in conformance with the CEMP.	Pre-construction (NET 90 days prior) Post-construction (within 30 days if needed)		USACE and City of San Clemente	SDRWQCB order
Caulerpa Monitoring	If applicable, USACE must conduct a surveillance-level survey for <i>Caulerpa taxifolia</i> and <i>Caulerpa prolifera</i> , in accordance with the requirements in the National Marine Fisheries Service's <i>Caulerpa</i> Control Protocol, not more than 90 days before the start of in-water Project activities to determine presence/absence of this species within the immediate vicinity of the project. If any <i>Caulerpa</i> are identified during a survey, or at any other time before, during, or within 120 days following completion of authorized activities, both National Marine Fisheries Service and California Department of Fish and Wildlife must be contacted within 24 hours of first noting the occurrence. If any <i>Caulerpa</i> are detected, all disturbing activity must cease until such time as the infestation has been isolated and treated, or the risk of spread from the disturbing activity is eliminated in accordance with the <i>Caulerpa</i> Control Protocol.	Pre-construction (NET 90 days prior) Construction Post-construction (120 days after)		USACE and City of San Clemente	2023 SEA/FONSI (Section 5.2)
Water Quality Monitoring	USACE must conduct visual monitoring of Project activities in the Pacific Ocean prior to, during, and after each period of project construction (e.g., pile extraction and driving) as described below. The receiving water visual monitoring	Pre-construction Construction Post-construction	Ongoing	USACE and City of San Clemente	SDRWQCB order

Mitigation Measure / Monitoring Commitment	Description	Period of Compliance	Date of Compliance	Responsible Party	Reference
	documentation must be included in the Annual Progress Reports as described in Attachment 2 of the SDRWQCB Order. The following parameters shall be visually monitored immediately outside of the construction area: floating particulates, suspended materials, surface visible turbidity plume; and Grease, oil, sheen, odor, color, or any other significant discoloration of the water surface.				
Annual Progress Report	<p>USACE must submit Annual Progress Reports to the SDRWQCB prior to March 1 of each year following the issuance of the Order and continue to provide the reports until the SDRWQCB accepts the Project Completion Notification submitted by the USACE. Annual Progress Reports must be submitted even if Project activities are not conducted during the reporting period.</p> <p>Annual reports must contain the status and anticipated schedule for both the Project and Compensatory Mitigation site(s). Additional requirements for the contents of Annual Progress Reports are detailed in Attachment 2 of the SDRWQCB Order.</p> <p>Annual Progress Reports must include, at a minimum, the following:</p> <ul style="list-style-type: none"> • The status and anticipated schedule for completion of Project construction activities, including the installation and operational status of construction best management practices for water quality protection; • A description of any Project construction delays encountered or anticipated that may affect the schedule; and • Photo documentation of all areas of impact before and after construction. Photo documentation must be conducted in accordance with SDRWQCB posted guidelines. 	Annually prior to March 1 until project completion		USACE and City of San Clemente	SDRWQCB order
Geographic Information System Data	USACE must submit Geographic Information System (GIS) shapefiles and metadata that show the Project site(s) and impact areas associated with the Project. As part of the final Annual Progress Report, the USACE must submit GIS shape files and metadata that show mitigation site(s), including extent and distribution of aquatic resources.	Construction (within 30 days of start)		USACE and City of San Clemente	2023 SEA/FONSI (Section 5.2)

Mitigation Measure / Monitoring Commitment	Description	Period of Compliance	Date of Compliance	Responsible Party	Reference	
Final EIS/EIR						
Air Quality	Potentially Significant Impact: The EIS/EIR identifies potential significant indirect impact AQ-50-3: Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable Federal or State ambient air quality standard.	MM-AQ-50-3.1: The construction contractors shall use on-shore heavy equipment that meets Tier II or higher air pollutant emission standards where these standards are applicable and equipment available.	Construction		USACE and City of San Clemente	Final EIS/EIR
	MM-AQ-50-3.2: All heavy equipment shall be maintained and tuned per manufacturer's specifications to perform at California Air Resources Board (CARB) and/or EPA certification, where applicable, levels and to perform at verified standards applicable to retrofit technologies.	Construction		USACE and City of San Clemente	Final EIS/EIR	
	Potentially Significant and Unavoidable Cumulative Impact: Section 6.2.1 of the EIS/EIR states that construction of the related projects would be short-term and depending on the extent of construction, could have effects similar to or greater than that of the proposed Project. Even with the prescribed mitigation, the proposed action is anticipated to exceed the significance threshold limitations for NOx and PM2.5. In accordance with SCAQMD methodology, projects that exceed the daily threshold values and cannot be mitigated to less than the SCAQMD thresholds add significantly to the cumulative impact. As such, the beach fill Project also is considered as significant and unavoidable at the cumulative level.	MM-AQ-50-3.1: The construction contractors shall use on-shore heavy equipment that meets Tier II or higher air pollutant emission standards where these standards are applicable and equipment available. MM-AQ-50-3.2: All heavy equipment shall be maintained and tuned per manufacturer's specifications to perform at California Air Resources Board (CARB) and/or EPA certification, where applicable, levels and to perform at verified standards applicable to retrofit technologies.	Construction		USACE and City of San Clemente	Final EIS/EIR

Mitigation Measure / Monitoring Commitment	Description	Period of Compliance	Date of Compliance	Responsible Party	Reference	
Water Resources, Sediments, Oceanography	<p>Potentially Significant Impact: The EIS/EIR identifies potential significant indirect impact WQ-50-1: The water quality objectives in the California Ocean Plan (SWRCB 2005) are violated.</p>	<p>MM-WR-50-1.1: A SWPPP and an OSPRP shall be prepared for all construction activities. These plans shall specify specific measures that shall be taken during dredging and beach construction to avoid introducing contaminants to the ocean via leaks and spills. All measures shall be adhered to during Project construction.</p> <p>MM-WR-50-1.2: Turbidity shall be monitored during dredging. If a visible turbidity plume is observed beyond the immediate dredging area, dredging activities shall be modified (e.g., decrease the rate of dredging, move to a new dredge location) until the turbidity plume disperses. Turbidity also shall be monitored during beach fill operations. If significant turbidity (i.e., a visible turbidity plume beyond the surf zone or rip current area) is observed, beach fill operations shall be modified (e.g., by slowing the rate of fill) until the turbidity plume disperses.</p>	Construction		USACE and City of San Clemente	Final EIS/EIR
	<p>Potentially Significant Impact: The EIS/EIR identifies potential significant indirect impact WQ-50-2: Project operations or discharges that change background levels of chemical and physical constituents or elevate turbidity would produce long-term changes in the receiving environment of the site, area, or region that would impair the beneficial uses of the receiving water.</p>	<p>MM-WR-50-1.2: Turbidity shall be monitored during dredging. If a visible turbidity plume is observed beyond the immediate dredging area, dredging activities shall be modified (e.g., decrease the rate of dredging, move to a new dredge location) until the turbidity plume disperses. Turbidity also shall be monitored during beach fill operations. If significant turbidity (i.e., a visible turbidity plume beyond the surf zone or rip current area) is observed, beach fill operations shall be modified (e.g., by slowing the rate of fill) until the turbidity plume disperses.</p>	Construction		USACE and City of San Clemente	Final EIS/EIR
Biological Resources		<p>MM-BR-50-2.1: An underwater survey for kelp and surfgrass shall be conducted by marine biologists prior to the initiation of beach fill activities. Based on the survey, a mooring location and a pipeline route shall be selected that minimizes contact with surfgrass and kelp habitat. If kelp and surfgrass</p>	Pre-construction, Construction, and Post-construction	Pre-construction monitoring completed in 2020	USACE and City of San Clemente	Final EIS/EIR

Mitigation Measure / Monitoring Commitment	Description	Period of Compliance	Date of Compliance	Responsible Party	Reference	
	<p>Potentially Significant and Unavoidable Impact: The EIS/EIR identifies potential significant indirect impact BR-50-2: A long-term net loss in the habitat value of a sensitive biological habitat. For the purposes of this analysis, kelp beds, surfgrass beds, and well developed rocky intertidal are considered sensitive biological habitats.</p>	<p>cannot be avoided completely, immediately following beach fill activities, another survey of the mooring and pipeline areas shall be conducted to determine whether kelp and surfgrass were damaged. If substantial damage to surfgrass or kelp occurs, an additional survey shall be conducted six months after the beach fill to determine if kelp and surfgrass have recovered. If substantial damage to kelp and eelgrass is still observed, restoration of habitat shall be implemented in consultation with the resource agencies.</p>				
		<p>MM-BR-50-2.2: Shallow subtidal surfgrass beds in the vicinity of San Clemente Beach shall be monitored to determine whether the proposed action adversely affects shallow subtidal reefs and surfgrass. Underwater transects shall be established offshore and downcoast from the proposed receiver beach. Control transects also shall be established upcoast of the project area. The transects shall be monitored by qualified biologists before and after the proposed action to determine whether the beach fill results in a long-term loss of surfgrass and/or reef habitat. The mitigation and monitoring plan is included as Vol. I, Appendix B. If adverse significant impacts to surfgrass and/or reef habitat compared to controls and baseline conditions are observed from the monitoring, subsequent nourishment activities will be modified to avoid or minimize these impacts as part of adaptive management. If adverse significant impacts still are observed after all reasonable attempts to avoid or minimize impacts have been exhausted, additional renourishment would not occur until impacted surfgrass has recovered or compensatory mitigation is completed. Compensatory mitigation will consist of the creation of shallow rocky habitat in the Project area at a site to be determined in consultation with NOAA Fisheries and CDFG. Rocky reef habitat will be created in the Project area at a ratio of 1 acre of</p>	<p>Pre-construction, Construction, and Post-construction</p>	<p>Pre-construction monitoring completed in 2020</p>	<p>USACE and City of San Clemente</p>	<p>Final EIS/EIR</p>

Mitigation Measure / Monitoring Commitment	Description	Period of Compliance	Date of Compliance	Responsible Party	Reference
Biological Resources	<p>Potentially Significant and Unavoidable Impact: The EIS/EIR identifies potential significant indirect impact BR-50-5: Substantial adverse impact on Essential Fish Habitat.</p>	<p>rocky reef habitat created for 1 acre of rocky reef habitat buried. If the monitoring determines that surfgrass has been affected by the Project, an experimental surfgrass restoration will be implemented. A successful method to transplant surfgrass has not been demonstrated, but recent studies by researchers at the University of California, Santa Barbara, have demonstrated some success restoring surfgrass using sprigs (Bull et al 2004).</p> <p>MM-BR-50-2.1: An underwater survey for kelp and surfgrass shall be conducted by marine biologists prior to the initiation of beach fill activities. Based on the survey, a mooring location and a pipeline route shall be selected that minimizes contact with surfgrass and kelp habitat. If kelp and surfgrass cannot be avoided completely, immediately following beach fill activities, another survey of the mooring and pipeline areas shall be conducted to determine whether kelp and surfgrass were damaged. If substantial damage to surfgrass or kelp occurs, an additional survey shall be conducted six months after the beach fill to determine if kelp and surfgrass have recovered. If substantial damage to kelp and eelgrass is still observed, restoration of habitat shall be implemented in consultation with the resource agencies.</p> <p>MM-BR-50-2.2: Shallow subtidal surfgrass beds in the vicinity of San Clemente Beach shall be monitored to determine whether the proposed action adversely affects shallow subtidal reefs and surfgrass. Underwater transects shall be established offshore and downcoast from the proposed receiver beach. Control transects also shall be established upcoast of the project area. The transects shall be monitored by qualified biologists before and after the proposed action to determine whether the beach fill results in a long-term loss of surfgrass and/or reef habitat. If adverse significant impacts to surfgrass and/or reef</p>	<p>Pre-construction, construction and post construction. Pre-construction monitoring completed in 2020.</p>	<p>USACE, City and Contractors</p>	<p>Final EIS/EIR</p>

Mitigation Measure / Monitoring Commitment	Description	Period of Compliance	Date of Compliance	Responsible Party	Reference	
		<p>habitat compared to controls and baseline conditions are observed from the monitoring, subsequent nourishment activities will be modified to avoid or minimize these impacts as part of adaptive management. If adverse significant impacts still are observed after all reasonable attempts to avoid or minimize impacts have been exhausted, additional renourishment would not occur until impacted surfgrass has recovered or compensatory mitigation is completed. Compensatory mitigation will consist of the creation of shallow rocky habitat in the Project area at a site to be determined in consultation with NOAA Fisheries and CDFW. Rocky reef habitat will be created in the Project area at a ratio of 1 acre of rocky reef habitat created for 1 acre of rocky reef habitat buried. If the monitoring determines that surfgrass has been affected by the Project, an experimental surfgrass restoration will be implemented. A successful method to transplant surfgrass has not been demonstrated, but recent studies by researchers at the University of California, Santa Barbara, have demonstrated some success restoring surfgrass using sprigs.</p>				
<p>Cultural Resources</p>	<p>Potentially Significant Impact: The Project has the potential for significant impact CR-50-1: Result in potentially significant impacts on cultural resources from project implementation.</p>	<p>MM-CR-50-1: Any earthmoving associated with this Project that will involve previously undisturbed soil will be monitored by a qualified archeologist who meets the Secretary of Interior's Standards for an Archeologist (see 36 CFR Part 61). Earthmoving includes grubbing and ground clearing, grading, and excavation activities. If a previously unidentified cultural resource (i.e., property) that may be eligible for the NRHP is discovered, all earthmoving activities in the vicinity of the discovery shall be diverted until the USACE complies with 36 CFR § 800.13(a)(2).</p>	<p>Construction</p>		<p>USACE and City of San Clemente</p>	<p>Final EIS/EIR</p>
		<p>MM-CR-50-2: Prior to construction, offshore borrow areas 1 and 2 will be subjected to an underwater remote sensing survey in order to determine if submerged cultural resources are</p>	<p>Pre-construction</p>	<p>Completed: June 3, 2020</p>	<p>USACE and City of San Clemente</p>	<p>Final EIS/EIR</p>

Mitigation Measure / Monitoring Commitment	Description	Period of Compliance	Date of Compliance	Responsible Party	Reference
		present within these areas. The USACE will comply with Section 106 of the NRHP and its implementing regulations at 36 CFR 800, as amended. This compliance involves the identification and evaluation of cultural resources and consultation with the California State Historic Preservation Officer (SHPO), Native American tribes, and interested parties.			
Noise	Potentially Significant Impact: The Project has the potential for significant impact N-50-4: Result in substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.	<p>MM-N-50-3.1: The City of San Clemente Noise Element discusses the potential impacts of construction noise on the residents and requires construction to employ feasible and practical techniques and practices that minimize the generation of excessive noise on adjacent land uses. The Applicant shall implement the following:</p> <ul style="list-style-type: none"> • Regardless of dredge activity timing, onshore equipment shall be restricted to the hours included in the City of San Clemente Noise Ordinance discussed above. • To reduce the nuisance value of on-shore construction noise, on-shore construction activities located within 500 ft (152 m) of any residential unit shall not begin before 8:00 a.m. (as opposed to 7:00 a.m. as allowed in the Noise Ordinance). Work beyond may be performed in accordance with the hours included in the City Noise Ordinance. This provision shall not apply to any equipment mobilizing from the staging area that may pass within 500 ft (152 m) so long as it is not actively engaged in the movement of sand. • During all construction, the Project contractors shall equip all onshore construction equipment with properly operating and maintained mufflers and engine shrouds consistent with manufacturers' standards. • All heavy equipment shall be maintained in a proper state of tune as per the manufacturers' specifications. 	Construction	USACE and City of San Clemente	Final EIS/EIR

Mitigation Measure / Monitoring Commitment	Description	Period of Compliance	Date of Compliance	Responsible Party	Reference
	<ul style="list-style-type: none"> The Project contractor shall place any stationary construction equipment as far as feasible from proximate receptor locations. 				
Recreation	Potentially Significant Impact: The Project has the potential for significant impact REC-50-4: Result in a safety hazard to recreational beach users.	MM-REC-50-4.1: Provide signs to warn swimmers, waders and surfers of potentially hazardous surf conditions. Provide extra lifeguards.	Construction		USACE, City and Contractors Final EIS/EIR
	Potentially significant and unavoidable short term and temporary impacts to Recreation have been identified in EIS/EIR Vol. I, Section 6.2.9 as there is the possibility that the initial beach fill or future maintenance nourishment activity may occur simultaneously along with Dana Point Harbor maintenance dredging activities. The cumulative presence of dredges and related dredging equipment may interrupt recreational activity in the Project vicinity for the duration of construction. Assuming beach use is low during the construction period, as it is planned for fall and winter seasons, cumulative impacts may be potentially significant, but temporary and short term in nature.	MM-REC-50-4.1: Provide signs to warn swimmers, waders and surfers of potentially hazardous surf conditions. Provide extra lifeguards.	Construction		USACE, City and Contractors Final EIS/EIR
Public Health and Safety		MM-WR-50-1.1: A SWPPP and an OSPRP shall be prepared for all construction activities. These plans shall specify specific measures that shall be taken during dredging and beach construction to avoid introducing contaminants to the ocean via leaks and spills. All measures shall be adhered to during Project construction.	Pre-Construction and Construction		USACE, City and Contractors Final EIS/EIR

Mitigation Measure / Monitoring Commitment	Description	Period of Compliance	Date of Compliance	Responsible Party	Reference	
	<p>Potentially Significant Impact: The Project has the potential for significant impact PHS-50-1: Substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection, police protection, schools, parks, and/or other public facilities.</p>	<p>MM-WR-50-1.2: Turbidity shall be monitored during dredging. If a visible turbidity plume is observed beyond the immediate dredging area, dredging activities shall be modified (e.g., decrease the rate of dredging, move to a new dredge location) until the turbidity plume disperses. Turbidity also shall be monitored during beach fill operations. If significant turbidity (i.e., a visible turbidity plume beyond the surf zone or rip current area) is observed, beach fill operations shall be modified (e.g., by slowing the rate of fill) until the turbidity plume disperses.</p>	<p>Construction</p>		<p>USACE, City and Contractors</p>	<p>Final EIS/EIR</p>

Appendix A – Green Sea Turtle Monitoring Program Details

Requirements	Period of Compliance	Responsible Party
<p>Inflow screening must be designed to capture and retain material for the qualified biologist to monitor for the presence of ESA-listed species. The screened area must be accessible to the biological monitor to ensure 100% observer coverage. The biological monitor must inspect the contents of all inflow screening boxes after every load, including opening the box (where applicable and safely accessible) and looking inside at all contents for evidence of ESA-listed species entrainment. If the contents are not clearly visible and identifiable from a location outside of the box, then in limited instances, the biological monitor may be required to enter the inflow box to identify contents for evidence of ESA-listed species take. All hopper dredges are required to have 100% inflow screening unless they must be removed for safety due to clogging as outlined below.</p> <ul style="list-style-type: none"> • Inflow screening size will start at 4-inch by 4-inch, but may be gradually adjusted to a larger screen size if clogging reduces the ability for the qualified biologist to monitor the inflow for the presence of ESA-listed species or if clogging reduces dredging production and thereby expands the time dredging is required. Scenarios that may result in the clogging of inflow and overflow screens are dredged and project specific. • All modifications will be made in close coordination with the dredging contractor, qualified biologist, appropriate USACE project managers, and NMFS. The USACE will provide NMFS with a notification when screen sizes are increased or inflow screens are removed that will include an explanation of what attempts were made to reduce the clogging problem, how long the problem may persist, and how effective overflow screening will be achieved. • If inflow screens are increased to be larger than 4-inch by 4-inch or are removed due to clogging, the USACE will continue to re-evaluate the risk of clogging on a load by load basis and the inflow screens will be reinstated when clogging is no longer occurring. The USACE will track the number of loads that inflow screens were removed as part of the reporting requirements. • Hopper dredge operators will not open the hydraulic doors on the inflow boxes prior to inspection by the qualified biologist for evidence of ESA-listed take. • If the inflow box cannot be observed due to clogging, the box contents cannot be dumped or flushed unless overflow screening that captures contents for observation by the qualified biologist is operational and monitored for evidence of take. Once overflow screening is operational, the qualified biologist shall also visually monitor box contents as they are dumped or flushed into the hopper. All hopper dredges are recommended to have operational overflow screening and monitor for take after each load. Overflow screening is required to be installed and monitored after each load if the inflow screening is removed or bypassed due to clogging. • Overflow screening must be designed to capture and retain material larger than the screen size for the qualified biologist to monitor for the presence of ESA-listed species. The screened area must be accessible to the qualified biologist to inspect for evidence of ESA-listed species take. • Screen size will start at 4-inch by 4-inch, but may be adjusted to a larger screen size if clogging reduces the ability for the qualified biologist to monitor the screen for the presence of ESA-listed species or if clogging reduces dredging production and thereby expands the time dredging is required. All modifications will be made in close coordination with the dredging contractor, qualified biologist, appropriate USACE project managers, and NMFS. If screen sizes are increased due to clogging, the risk of clogging will be re-evaluated weekly and the overflow screens will be reinstated using the smallest screen size that can be effectively used (preferably 4 inch by 4 inch) when clogging is no longer occurring. 	Construction	USACE / City of San Clemente (via dredging contractor)

Requirements	Period of Compliance	Responsible Party
<p>To prevent impingement or entrainment of ESA-listed species within the water column, dredging pumps will be disengaged by the operator when the dragheads are not actively dredging and therefore working to keep the draghead firmly on the bottom. Pumps will be disengaged when lowering dragheads to the bottom to start dredging, turning, or lifting dragheads off the bottom at the completion of dredging. Hopper dredges may utilize a bypass or other system that would allow pumps to remain engaged, but result in no suction passing through the draghead.</p>	Construction	USACE / City of San Clemente (via dredging contractor)
<p>Pumping water through the dragheads is not allowed while maneuvering or during travel to/from the disposal or pumpout area. The dredge operator will ensure the draghead is embedded in sediment when pumps are operational, to the maximum extent practicable.</p>	Construction	USACE / City of San Clemente (via dredging contractor)
<p>If green sea turtles are regularly seen by project monitors in the action area, especially within the vicinity of hopper dredging operations, the USACE shall contact NMFS to discuss implementation of any additional measures to reduce the risks of direct contact injuries or other adverse effects, along with potential modification of the green sea turtle monitoring plan to more specifically evaluate the impacts of the proposed project within this specific area.</p>	Construction	USACE / City of San Clemente (via dredging contractor)
<p>If the USACE's final monitoring and mitigation plan indicates that the currently available pre-construction survey information is inadequate to assess impacts to nearshore rocky reef and associated biological communities, and additional pre-construction physical and biological monitoring is not practicable to implement prior to the first nourishment event, then the USACE should utilize acoustic survey techniques similar to that already obtained for pre-construction purposes (i.e., Nearshore and Wetland Surveys 2018) to assess change in area of rocky reef substrate after completion of sediment placement. In this circumstance, any post-construction reductions in reef area that are measured which exceed a statistically reliable estimate of natural variability within the action area should be assumed to be due to the Project, and the USACE should implement rocky reef creation consistent with the associated environmental commitment in the EIS/EIR, or a functionally equivalent mitigation alternative. In addition, in this circumstance the USACE should assume some reduction in quantity and/or quality of surfgrass habitat and should implement the test surfgrass transplant as planned for in the EIS/EIR.</p>	Post-construction	USACE
<p>During any reef construction operations, a qualified biologist will monitor for the presence of ESA-listed green sea turtles. The barge operator will maintain a safe working environment for the qualified biologist. The green sea turtle monitor will identify and communicate if there is a need to cease or alter operations to avoid impacts to green sea turtles. The biologist or monitor will clear the construction area and confirm no green sea turtles are present 30 minutes prior to the startup of reef placement operations. If a green sea turtle is observed within the vicinity of the project site during project operations, all appropriate precautions shall be implemented to avoid or minimize unintended impacts. These precautions include but are not limited to:</p> <ul style="list-style-type: none"> • Cessation of operations within 100 feet of an observed green sea turtle; · • Operations may not resume until the green sea turtle has departed the monitoring zone by its own accord or has not been observed for a 15-minute period of time; and • Maneuver the barge to avoid any free-swimming green sea turtles observed during transit. 	Post-construction if required	USACE
<p>Adequate lighting will be provided during nighttime operations (i.e., dredging, dredge material transport and placement) to allow the monitor to observe the surrounding area effectively.</p>	Construction	USACE / City of San Clemente (via dredging contractor)

Requirements	Period of Compliance	Responsible Party
The biologist or monitor will clear the dredging area and confirm no GSTs are present 30 minutes prior to the startup of dredging operations.	Construction	USACE / City of San Clemente (via dredging contractor)
<p>If a GST is observed within the vicinity of the project site during project operations, all appropriate precautions shall be implemented to avoid or minimize unintended impacts. These precautions include, but are not limited to:</p> <ul style="list-style-type: none"> • Cessation of operations within 100 feet of an observed GST; • Operations may not resume until the GST has departed the monitoring zone by its own accord or has not been observed for a 15-minute period of time; and • Maneuver the hopper dredge to avoid any free-swimming GSTs observed during transit. 	Construction	USACE / City of San Clemente (via dredging contractor)
<p>Biological monitors will maintain a written log of all GST observations during project operations. This observation log will be provided to the USACE and NMFS as an attachment to the postconstruction report for the project. Each observation log will contain the following information:</p> <ul style="list-style-type: none"> • Observer name and title; • Type of construction activity (maintenance dredging, etc.); • Date and time animal first observed (for each observation); • Date and time observation ended (for each observation). A GST observation will terminate if (1) an animal is observed exiting the monitoring zone or (2) after a 15-minute period of no observation (assumption is that animal has exited, but was not observed to do so); • Location of monitor (latitude/longitude), direction of GST in relation to the monitor, and estimated distance (in meters) of GST to the monitor; and • Nature and duration of equipment shutdown. 	Construction	USACE / City of San Clemente (via dredging contractor)
The Contractor will implement an Environmental Protection Plan that will include a GST Monitoring and Avoidance Plan and an employee training program on GST observation protocols, avoidance, and minimization measures. The program will be conducted by the Biological Monitor and a record kept of dates of training, names and positions of attending employees, and an outline of the training presentation.	Construction	USACE / City of San Clemente (via dredging contractor)
In addition to a monitor onboard the hopper dredge, a qualified biologist or qualified monitor with experience monitoring green sea turtles will be onboard any construction barge used for creating rocky reefs as compensatory mitigation, and will monitor for the presence and behavior of green sea turtles.	Post-construction if required	USACE
Upon completion of each nourishment event and any compensatory mitigation activities, the USACE shall complete a report summarizing all data recorded during all monitoring throughout all phases of the proposed project, including all documentation and summary analysis of the presence and behavior of green sea turtles, effectiveness of the monitoring and avoidance measures, and assessment of any potential impacts that may have occurred throughout the entire proposed action.	Post-construction	USACE
Prior to initiating the proposed project, the USACE shall provide NMFS WCR an updated monitoring plan for minimizing and avoiding the impacts of project activities on sea turtles.	Pre-construction	USACE

Requirements	Period of Compliance	Responsible Party
<p>The USACE shall require project monitors, key contractors and USACE project personnel to attend a project briefing prior to starting work on the proposed project. The project briefing shall review the protocols for minimization and avoidance of impacts to sea turtles as described in this biological opinion, as well as review the latest scientific information regarding green sea turtle ecology in the action area.</p>	Pre-construction	USACE / City of San Clemente (via dredging contractor)
<p>Prior to initiating the proposed project and in coordination with NMFS WCR, the USACE shall develop and provide NMFS WCR a detailed final monitoring and mitigation reporting plan regarding Project effects on nearshore rocky reef habitat and associated biological communities. The USACE shall coordinate with Bryant Chesney (Bryant.Chesney@noaa.gov) prior to final submission. The final plan and any updates shall be provided to Dan Lawson at the email address identified above. The monitoring and mitigation plan shall be developed to address and evaluate the accuracy of key assumptions and expectations regarding the anticipated environmental impacts of the proposed action in comparison to any resulting impacts that do occur; the adequacy of the monitoring and analytical methods to identify and accurately measure impacts from the beach nourishment effort. the physical and biological monitoring of key habitat features throughout the sediment equilibrium footprint, such as the area of bedrock, boulder, cobble, and sand bottom habitat, as well as indicators of habitat quality, such as surfgrass, algae, and invertebrate cover and abundance; the appropriate mitigation sites for rocky reef creation and/or alternative mitigation activities that could enhance the quantity and/or quality of green sea turtle foraging and resting habitat; and the reporting timeline and process for documenting the extent of incidental take of green sea turtles through nearshore reef burial and/or sedimentation. At a minimum, the monitoring plan should report the extent of reef habitat within the sediment equilibrium footprint and quantify any reduction in rocky reef area. In addition, the report shall document any reductions in cover of surfgrass, macroalgae, and sessile invertebrates within the sediment equilibrium footprint. A draft report for each monitoring event shall be provided to NMFS WCR within 60 days following completion of habitat monitoring activities by email to Dan.Lawson@noaa.gov, with a final report provided within 90 days.</p>	Pre-construction	USACE
<p>Prior to initiation of any future beach renourishment events, the USACE shall develop, in coordination with NMFS WCR, a standardized and consistent protocol for assessing impacts to nearshore rocky reef communities for future events based upon consideration of any deficiencies identified in development of the final monitoring and mitigation reporting plan described in 1F above, information collected from monitoring during the initial nourishment event, and other relevant impact assessment approaches used for similar types of projects. The protocol and any updates shall be provided to Dan Lawson at the same email address listed above.</p>	Post-construction	USACE

Appendix B – Surfzone Monitoring Program

Requirements	Period of Compliance	Responsible Party
Adequate baseline data collection, including, if feasible, a full year of preconstruction monitoring to determine the baseline condition. If this is infeasible, then another local surf site should be monitored as a control (e.g., Lower Trestles, which is already monitored daily and shown on the website: www.surflines.com).	Pre-construction	USACE / City of San Clemente
Identification of locations to be monitored, the length of the pre-project monitoring, and interest groups to be involved in establishing the monitoring effort to identify surfing or surf quality changes that might be attributable to the nourishment project, including identifying criteria for a determination of what constitutes a significant alteration or impact.	Pre-construction	USACE / City of San Clemente
Supplementing the “wave observation” component of the surf monitoring with observations about the surfing activities, including a usage scale of surfers in the water, both morning and mid-day, and describing the average and maximum ride lengths.	Pre-construction	USACE / City of San Clemente
Given that video recordings are included, if observer counts are too difficult for one observer, video may be used to augment observer counts.	Pre-construction	USACE / City of San Clemente
When collecting user data, the analysis should be disaggregated into weekday and weekend data.	Pre-construction	USACE / City of San Clemente
For mid-day observations on days when surfers are kept out of the water by lifeguards, these should be recorded as restricted use days (not zero use days).	Pre-construction	USACE / City of San Clemente
Establishing mechanisms for informing the local community about the project, and encouraging public comments on surfing quality (or other recreational concerns), including but not limited to: <ul style="list-style-type: none"> • a web site; • pre-construction notifications to the public; and • signs. 	Pre-construction	USACE / City of San Clemente

Appendix C – Additional Operational Recommendations, SOPs and BMPs (Non – NEPA & CEQA RELATED)

Standard Operating Procedures and/or Best Management Practices	Description	Party Responsible	Reference
Recreation	Contract specifications shall require the contractor to fence/secure off areas of construction from public access, including construction staging areas and active construction areas, including the beach and nearshore zone.	Contractor; USACE; City of San Clemente	Final EIS/EIS
Navigational Safety	<ul style="list-style-type: none"> • The dredge would be equipped with markings and lightings in accordance with the U.S. Coast Guard regulations. • The location and schedule of the dredge would be published in the U.S. Coast Guard Local Notice to Mariners. • The dredge would travel at very low speeds (approximately 1.5 knots) during dredging operations. • The travel speed during transport would be approximately 5 knots. • During dredging and nourishment activities, proper advanced notice to mariners would be obtained, and navigational traffic would not be allowed within the offshore borrow site area or mooring/discharge area offshore of Oceanside. 	Contractor; USACE	Final EIS/EIR
Commercial Fishing Association Notification	The local commercial fishermen’s association shall be provided with written notification of the intended start date of onshore construction, offshore construction, maps of project-related vessel transportation routes, and its duration. Noticing shall include a point of contact throughout the entire construction phase to respond to concerns regarding interference and/or other issues associated with local commercial fishing operations.	Coast Guard (via contractor); USACE	Final EIS/EIR

APPENDIX B

SAN CLEMENTE SHORELINE PROTECTION PROJECT
SURFISDE-SUNSET BORROW SITE AIR QUALITY ANALYSIS,
MARCH 2024

MEMORANDUM

TO: Leslea Meyerhoff, AICP
Coastal Administrator, City of San Clemente

FROM: Dan Jones, Senior Associate
RCH Group

DATE: March 6, 2024

SUBJECT: San Clemente Shoreline Protection Project Surfside-Sunset Borrow Site Air Quality Analysis

Introduction

RCH Group (RCH) has reviewed the proposed new Surfside-Sunset borrow site location together with the San Clemente Shoreline Protection EIS/EIR Air Quality Section and its Appendix C – Air Quality Analysis Report. The only proposed change to the project analyzed in the Certified EIS/EIR is the location of the proposed new Surfside-Sunset borrow site, while all other aspects of the project including onshore emission sources remain unchanged from what was analyzed in the Certified EIS/EIR. The following presents the air quality calculations for the proposed new Surfside-Sunset borrow site location compared to the Oceanside borrow site analyzed in the Certified EIS/EIR.

Air Quality Thresholds of Significance

The Oceanside borrow site analyzed in the Certified EIS/EIR is in the San Diego Air Basin (SDAB) under the jurisdiction of the San Diego Air Pollution Control District (SDAPCD). San Clemente and the proposed new Surfside-Sunset borrow site is in the South Coast Air Basin (SCAB) under the jurisdiction of the South Coast Air Quality Management District (SCAQMD). As shown in **Table 1**, the thresholds of significance for the two air districts remain the same as described in the Certified EIS/EIR, except that SCAQMD has now adopted a lead emissions threshold of 3 pounds (lbs)/day.

Table 1: Regional Thresholds of Significance

Pollutant	SCAG Regional		SDAG Screening Level		
	Construction Emissions (lbs/day)	Operations Emissions (lbs/day)	Total Emissions (lbs/hr)	Total Emissions lbs/day	Total Emissions tons/year
ROG	75	55			
NOx	100	55	25	250	40
CO	550	550	100	550	100
PM10	150	150	----	100	15
PM2.5	55	55	----	55	10
SOx	150	150	25	250	40
Lead and lead compounds	NA	NA	----	3.2	0.6
VOC	NA	NA	----	75	13.7

Proposed New Borrow Site Locations

Figure 1 displays the Oceanside borrow site analyzed in the Certified EIS/EIR and the proposed new Surfside-Sunset borrow site.

Figure 1 –Borrow Site Locations



Off-Shore Dredge Emissions Air Quality Impacts

The Certified EIS/EIR did not allocate the total offshore dredge emissions into the two air basins, but the Air Quality Analysis Report by Chambers Group, Inc. (March 2021) (Appendix C to the Certified EIS/EIR) did state:

“Since the borrow site is in the SDAB and the project site is in the SCAB, emissions were assigned to the separate basins by assigning all of the loading emissions, half of the idling emissions and 81 percent of the sailing emissions to the SDAB and all of the unloading emissions, half of the idling emissions, 19 percent of the sailing emissions and all of the on-shore emissions to the SCAB. In total, all the on-shore and 32 percent of the off-shore emissions will be in the SCAB and the other 68 percent of the off-shore emissions would be in the SDAB.”

In order to compare the off-shore dredge emissions of the proposed new Surfside-Sunset borrow site to the Certified EIS/EIR off-shore dredge emissions, the Certified EIS/EIR off-shore dredge emissions were allocated into the SDAB and SCAB based on these assumptions and are displayed in **Table 2**. This makes for a more conservative comparison of dredge emissions and allows for comparison to the applicable significance

threshold for each air basin. As shown in the following analysis, Certified EIS/EIR dredge emissions are substantially higher than the proposed new Surfside-Sunset borrow site dredge emissions, and thus the proposed new Surfside-Sunset borrow site scenario would result in substantially reduced air quality impacts compared to the Certified EIS/EIR. However, the Surfside-Sunset borrow site location could generate greater emissions in one of the air basins than what was assumed in the Certified EIS/EIR, thus the Certified EIS/EIR and proposed new Surfside-Sunset borrow site location dredge emissions were allocated into the applicable air basin so net emissions could be calculated and compared to the applicable significance thresholds.

Table 2: Certified EIS/EIR Project Daily Dredge Emissions by Air Basin (lbs/day)

BASIN	CO	NOx	VOC	SOx	PM10
SDAB	199.07	1339.18	36.19	85.96	40.72
SCAB	93.68	630.20	17.03	40.45	19.16
TOTAL	292.74	1969.38	53.23	126.41	59.88

Dredge emissions were quantified for the proposed new Surfside-Sunset borrow site locations using specific emission factors from the dredge supplier and assumptions from USACE regarding time loading, sailing, and unloading (see **Attachment A** for supporting calculations). The Surfside-Sunset borrow site scenario would be 100 percent in the SCAB and would result in no dredge emissions in the SDAB. The dredge emissions for the proposed new Surfside-Sunset borrow site location were allocated into the SDAB and SCAB and are displayed in **Table 3**.

Table 3: Surfside-Sunset Borrow Site Dredge Emissions by Air Basin (lbs/day)

BASIN	CO	NOx	VOC	SOx	PM10
SDAB	--	--	--	--	--
SCAB	110.73	665.31	34.95	0.87	6.93
TOTAL	110.73	665.31	34.95	0.87	6.93

To determine if the use of the proposed new Surfside-Sunset borrow site would have new or more severe air quality impacts, the Certified EIS/EIR dredge emissions were subtracted from the dredge emissions for the Surfside-Sunset borrow site dredge emissions to determine the net dredge emissions for comparison to the applicable SCAQMD and SDAPCD significance thresholds. The net dredge emissions for the Surfside-Sunset borrow site allocated into the SDAB and SCAB and compared to the applicable significance thresholds are displayed in **Table 4**.

Table 4: Surfside-Sunset Borrow Site Net Dredge Emissions by Air Basin (lbs/day)

BASIN	CO	NOx	VOC	SOx	PM10
SDAB	-199.07	-1339.18	-36.19	-85.96	-40.72
Threshold	550	250	75	250	100
SCAB	17.05	35.11	17.92	-39.58	-12.23
Threshold	550	100	75	150	150

Note: The negative values indicated an emissions reduction. This is because the dredge to be used has a cleaner engine and lower emission factors than what was assumed in the Certified EIS/EIR due to recent regulatory requirements.

As shown in **Table 4**, the proposed new Surfside-Sunset borrow site location would result in net emissions that would be below the applicable SDAPCD and SCAQMD thresholds of significance (and would provide significant emissions reductions in the SDAB and overall).

To determine if the use of the proposed new Surfside-Sunset borrow site would have new or more severe greenhouse gas (GHG) emissions impacts, the Certified EIS/EIR dredge emissions were subtracted from the dredge emissions for the Surfside-Sunset borrow site dredge emissions. The net dredge GHG emissions for the Surfside-Sunset borrow site are displayed in **Table 5**.

Table 5: Surfside-Sunset Borrow Site Net Dredge GHG Emissions (metric tons CO₂)

Daily GHG Emissions (metric tons CO ₂ /day)		Annual GHG Emissions (metric tons CO ₂ /year)	
Certified EIS/EIR	45	Certified EIS/EIR	2,054
Surfside-Sunset	37	Surfside-Sunset	967
Net Daily GHG Emissions	-7	Net Annual GHG Emissions	-1,087

Note: The negative values indicated an emissions reduction. This is because the dredge to be used has a cleaner engine, uses lower carbon fuels, and has lower emission factors than what was assumed in the Certified EIS/EIR due to recent regulatory requirements.

As shown in **Table 5**, the proposed new Surfside-Sunset borrow site location would result in a GHG emissions reduction for both daily and annual scenarios compared to the Oceanside borrow site analyzed in the Certified EIS/EIR. As a temporary and intermittent construction project, there are no applicable significance thresholds nor is there an applicable local or Climate Action Plan. State regulations, plans and policies adopted for the purpose of reducing GHG emissions would continue to be implemented and the Modified Project would be required to comply, as applicable.

Certified EIS/EIR Air Quality Conclusions

The Certified EIS/EIR concluded the following:

- No significant impact would occur related to a conflict or obstruction of the implementation of the applicable air quality plan.
- No significant impact would occur related to the violation of any air quality standard or the substantial contribution to an existing or project air quality violation.
- Significant impacts would be mitigated to less than significant through Mitigation Measure AQ-50-3.2 related to a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under applicable Federal or State ambient air quality standards.
- No significant impact would occur related to the exposure of sensitive receptors to substantial air pollutant concentrations.
- No significant impact would occur related to the creation of objectionable odors affecting a substantial number of people.
- No significant impact would occur related to greenhouse gases.

Because the proposed new Surfside-Sunset borrow site would result in net emissions that would be below the applicable SDAPCD and SCAQMD thresholds of significance, no new or more severe significant impacts would occur.

Conclusion

The Surfside-Sunset borrow site would result in net emissions that would be below applicable SDAPCD and SCAQMD thresholds of significance. All other aspects of the project, including onshore emission sources, remain unchanged from what was analyzed in the Certified EIS/EIR. Therefore, the potential use of the proposed new Surfside-Sunset borrow site would not result in new or more severe air quality impacts than what was analyzed and disclosed in the Certified EIS/EIR.

Sincerely,



Dan Jones

Senior Associate

RCH Group

Attachment A

Supporting Air Quality Calculations

Heavy Equipment Emissions (from Appendix B of March 2011 AQ Analysis in FEIS)

	hrs/day	Hp	load factor	Emission Factors (lbs/hp-hr)						Daily Emissions lbs/day					
				CO	Nox	ROG	Sox	PM10	CO2	CO	Nox	ROG	Sox	PM10	CO2
Dredge Propulsion															
Loading	4.58	4300	65%	0.0044	0.0296	0.0008	0.0019	0.0009	1.4784	56.3	378.9	10.2	24.3	11.5	18,925.1
Sailing	11.99	4300	80%	0.0044	0.0296	0.0008	0.0019	0.0009	1.4784	181.5	1,220.9	33.0	78.4	37.1	60,977.5
Unloading	3.2	4300	5%	0.0044	0.0296	0.0008	0.0019	0.0009	1.4784	3.0	20.4	0.6	1.3	0.6	1,017.1
Idling	1.83	4300	5%	0.0044	0.0296	0.0008	0.0019	0.0009	1.4784	1.7	11.6	0.3	0.7	0.4	581.7
Dredge Pumps/Jets															
Loading	4.58	1700	65%	0.0044	0.0296	0.0008	0.0019	0.0009	1.4784	22.3	149.8	4.0	9.6	4.6	7,482.0
Sailing	11.99	1700	5%	0.0044	0.0296	0.0008	0.0019	0.0009	1.4784	4.5	30.2	0.8	1.9	0.9	1,506.7
Unloading	3.2	1700	70%	0.0044	0.0296	0.0008	0.0019	0.0009	1.4784	16.8	112.7	3.0	7.2	3.4	5,629.7
Idling	1.83	1700	0%	0.0044	0.0296	0.0008	0.0019	0.0009	1.4784	0.0	0.0	0.0	0.0	0.0	0.0
Dredge Generators															
Loading	7.67	565	35%	0.0044	0.0296	0.0008	0.0019	0.0009	1.4784	6.7	44.9	1.2	2.9	1.4	2,242.4
Unloading	3.2	4268	40%	0.0044	0.0296	0.0008	0.0019	0.0009	1.4784	24.0	161.7	4.4	10.4	4.9	8,076.6
Auxillary	7.67	565	35%	0.0044	0.0296	0.0008	0.0019	0.0009	1.4784	6.7	44.9	1.2	2.9	1.4	2,242.4
Crewboat (in gal/hr)	20	2.8	50%	0.14	0.34	0.18	0.027	0	1.4784	3.9	9.5	5.0	0.8	0.0	41.4
Dozer	20	580	100%	0.003002	0.00553	0.000726	4.48243E-06	0.000236	0.456677	34.8	64.1	8.4	0.1	2.7	5,297.5
Front-End Loader	20	430	100%	0.000979	0.003571	0.000461	3.89824E-06	0.000131	0.346457	8.4	30.7	4.0	0.0	1.1	2,979.5
Daily Total (lbs/day)										370.6	2,280.4	76.2	140.5	70.0	116,999.6
Daily Total (tons/day)										0.19	1.14	0.04	0.07	0.04	58.50
Total tons (assuming 46 days)										8.52	52.45	1.75	3.23	1.61	2690.99

Just Dredge

Daily lbs/day	292.7	1,969.4	53.2	126.4	59.9	98,362.3
Total Tons (over 46 days)	6.73	45.30	1.22	2.91	1.38	2262.33

Surfside-Sunset (2024 Supplemental Environmental Review)

Hrs/day	Hourly Emissions in lbs/hr						Emissions lbs/day						
	CO	NOx	VOC	SOx	PM10	CO2	CO	NOx	VOC	SOx	PM10	CO2	
Bayport Digging	3	5.80	33.96	1.78	0.05	0.37	3413.00	17.40	101.88	5.34	0.15	1.11	10239.00
Bayport Sailing	18	3.67	23.72	1.25	0.03	0.23	3413.00	66.06	426.96	22.50	0.54	4.14	61434.00
Bayport Pumping Off	3	9.09	45.49	2.37	0.06	0.56	3413.00	27.27	136.47	7.11	0.18	1.68	10239.00
Total	24							110.73	665.31	34.95	0.87	6.93	81912.00

	Emissions lbs/day					SDAB Emissions lbs/day					SCAB Emissions lbs/day					
	CO	NOx	VOC	SOx	PM10	CO	NOx	VOC	SOx	PM10	CO	NOx	VOC	SOx	PM10	
EIS/EIR	292.74	1969.38	53.23	126.41	59.88	EIS/EIR	199.07	1339.18	36.19	85.96	40.72	93.68	630.20	17.03	40.45	19.16
Surfside	110.73	665.31	34.95	0.87	6.93	Surfside	0	0	0	0	0	110.73	665.31	34.95	0.87	6.93

	Net Emissions Overall Emissions lbs/day					Net Emissions by Air Basin for Surfside Emissions lbs/day					GHG Emissions Comparison				
	CO	NOx	VOC	SOx	PM10	CO	NOx	VOC	SOx	PM10	Daily MT/day		Annual (MT/Year)		
Surfside	-182.01	-1,304.07	-18.28	-125.54	-52.95	SDAB	-199.07	-1339.18	-36.19	-85.96	-40.72	EIS/EIR	45	EIS/EIR	2054
						SCAB	17.05	35.11	17.92	-39.58	-12.23	Surfside	37	Surfside	967
												Net	-7	Net	-1087

* Dredge emission factors provided by Manson. Emission factors include ALL engines on dredge. Calculations based on actual fuel consumption. Because factors are based on fuel consumptions, changes in load factors are integrated in real time into the different phases of dredge operation (digging, sailing, pumping).

** CO2 emission factor for dredge was not provided by dredge contractor. The CO2 emission factors used comes from Sacramento AQMD Harbor Craft emission factors calculator. Dredge emission factors assume 2 propulsion engines.

APPENDIX C

USACE BIOLOGICAL EVALUATION, FEBRUARY 2024

San Clemente Shoreline Protection Project
Biological Evaluation of Proposed Modification
Additional Borrow Area
February 2024

References:

1. Endangered Species Act Section (7)(a) Biological Opinion and Magnuson-Stevens Fishery Conservation Act Essential Fish Habitat Response. National Marine Fisheries Service Consultation Number WCRO-2022-02052. May 2023.
2. San Clemente Shoreline Protection Project. Supplemental Environmental Assessment. May 2023.
3. San Clemente Shoreline Protection Project. Environmental Impact Statement/Environmental Impact Report. USACE, June 2011.
4. Green Sea Turtle Minimization and Avoidance Measures (Attachment).
5. Surfside-Sunset Stage 13 Final Environmental Assessment. USACE, 2019.
6. Surfside-Sunset Stage 13 Supplemental Environmental Assessment. USACE, 2023.

Introduction

This Biological Evaluation assesses whether adding an additional borrow area to the San Clemente Shoreline Protection Project would result in new or different effects to Green Sea Turtle (*Chelonia mydas*) (GST) that were not previously considered in the 2023 Biological Opinion (WCRO-2022-02052). The USACE requests an amendment to the Biological Opinion (NMFS, May 2023) (BO) for inclusion of the Surfside-Sunset borrow area. The USACE also requests conferencing under the Endangered Species Act 50 CFR § 402.10 for proposed critical habitat for GST for the project including the existing approved borrow site, the placement area and the proposed additional borrow site.

The authorized project as described in the 2011 Environmental Impact Statement/Environmental Impact Report (EIS/EIR) and a 2023 Supplemental Environmental Assessment (SEA) consists of recurring dredging of material from a borrow site located offshore of Oceanside and placement of the dredged material onto San Clemente Beach, centered about the San Clemente municipal pier. The designed beach fill consists of a 50 foot wide beach, approximately 3,600 feet long and a design foreshore slope of 8H:1V. Due to operational challenges the USACE's construction contractor is encountering at the Oceanside borrow site, and to allow for operational flexibility, the USACE is proposing to add an additional offshore borrow area to be used for obtaining sand for placement at the San Clemente Beach. The proposed borrow area is the same that is being used for a similar USACE beach nourishment project

at Surfside-Sunset Beaches, Orange County, California (Surfside-Sunset). The Surfside-Sunset borrow site would be utilized to complete the initial construction phase. The beach fill location remains the same while the borrow sites are revised. The total dredge volume and beach fill quantity remain the same.

Consultation History

The USACE requested informal consultation with National Marine Fisheries Service (NMFS) under Section 7 of the Endangered Species Act (ESA) for Green sea turtle (*Chelonia mydas*) (GST) on August 16, 2022. NMFS did not concur with the USACE's Not Likely to Adversely Effect determination, and stated their intent to prepare a Biological Opinion (BO) in accordance with the standards and procedures for formal consultation under section 7 of the ESA on January 6, 2023. NMFS evaluated the information provided by USACE through informal consultation and indicated that USACE had satisfied the requirements for initiating formal consultation under 50 CFR §402.14(c), and considered formal consultation to have been initiated as an outcome of the conference call between NMFS and USACE staff on December 9, 2022. The NMFS issued the Biological Opinion (BO) for the consultation on May 8, 2023.

The BO contained the Incidental Take Statement, Reasonable and Prudent Measures, Terms and Conditions and Conservation Measures. The Terms and Conditions are primarily categorized into two categories: activities related to dredging and activities related to sediment placement. In addition, the USACE committed to other minimization and avoidance measures. These are found in Reference 4, attached to this document.

Proposed Modification

The only proposed modification to the Authorized Project is to add an additional borrow site at Surfside-Sunset. The Project would continue to be constructed with hopper dredging equipment with pump ashore capability and conventional earthmoving equipment. Typical Los Angeles District beach fill projects require large capacity open-ocean capable dredges. A medium-sized hopper dredge would likely continue to be used. The hopper dredge effective capacity is estimated at 3,500 cy. The hopper dredge would pump out the dredge material via a 24-inch pipe line at 1,800 cy/hr (1,376 m³/hr). The hopper dredge would be filled at one of the borrow sites. The approved borrow site identified in the 2011 EIS/EIR and the 2023 SEA located offshore of Oceanside would remain a potential borrow site for the San Clemente Project.

The additional, proposed borrow site is located approximately one mile offshore at the Surfside-Sunset borrow site approximately 29 nautical miles (NM) north of San Clemente. Dredge traveling times for Surfside-Sunset are between 2.9 hours to 3.6 hours on average, depending on multiple factors. The relative position of Surfside-Sunset borrow site is illustrated in Figure 1. The approximate boundary coordinates for Surfside-Sunset are listed in the below table. The Surfside-Sunset site comprises 106 acres.

SURFSIDE BORROW AREA		
TABLE OF COORDINATES		
POINT	EASTING (X)	NORTHING (Y)
A	5,999,129	2,206,530
B	6,000,664	2,205,097
C	5,999,299	2,203,635
D	5,997,764	2,205,068

The transit distance and direction from San Clemente to Surfside-Sunset for the dredging vessel are approximately 29 NM on a northbound trajectory. Given an approximately 8 hour load cycle time, it is anticipated the dredge will complete about 3 loads per day. Dredging is anticipated to re-commence for the San Clemente Shoreline project in Spring or Summer 2024, but will be dependent upon other factors including, but not limited to timing of approvals, construction contract, available funding, and weather conditions.



Figure 1. Map illustrating relative locations of San Clemente Shoreline project placement site, Oceanside Borrow area and Surfside-Sunset borrow area.

The Surfside-Sunset borrow area is at present utilized for the Surfside-Sunset Stage 13 project. The San Clemente Shoreline Project would not use this borrow site while Surfside-Sunset is in active construction.

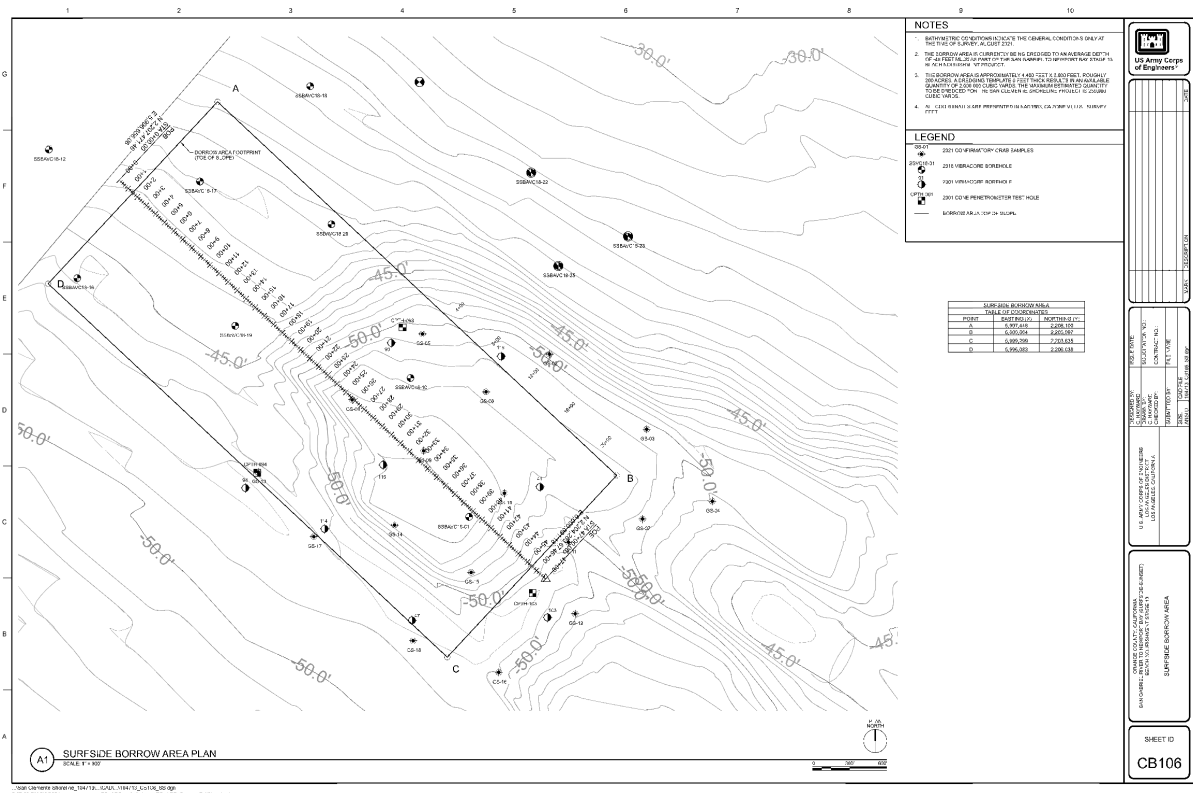


Figure 2. Surfside-Sunset borrow area plan sheet.

Species Status at Surfside-Sunset Borrow Area

The 2023 NMFS BO notes three resident GST populations in Southern California are known, one being the San Gabriel River/Anaheim Bay wetland complex. Anaheim Bay is located approximately one mile from the Surfside-Sunset Borrow Area. In the BO, NMFS stated “*Green sea turtle adults and benthic-foraging juveniles generally occupy small home ranges that include foraging resources and underwater refugia. However, some individuals move long distances between foraging areas, including one individual tracked from San Diego Bay to a foraging area near Long Beach, California (SWFSC unpublished data 2016). In 2006, a green sea turtle outfitted with a satellite transmitter was tracked and traveled from Long Beach to the San Onofre nuclear power plant.*”

The primary constituents of GST foraging and resting resource are present inside the Anaheim Bay wetland complex. Rocky reef, surfgrass, eelgrass or invertebrates that would be utilized by GST are not present within the Surfside-Sunset Borrow Area. However, anecdotal citizen science data (iNaturalist, February 2023) indicates the presence of GST in the Surfside-Sunset vicinity.

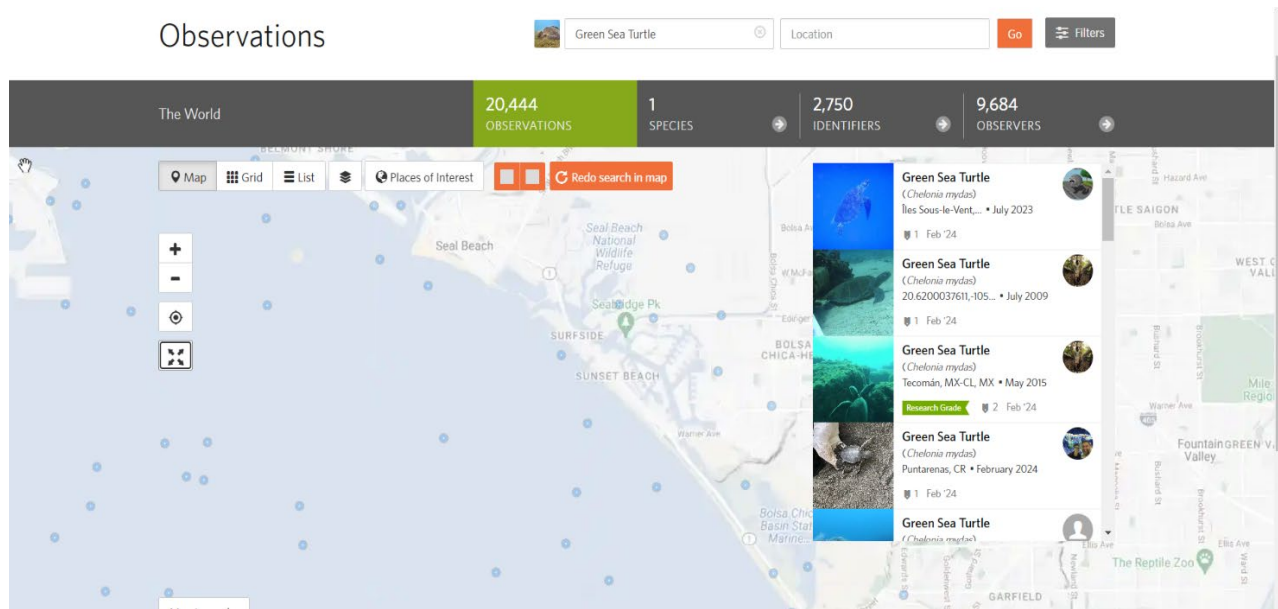


Figure 3. Screenshot image of citizen science GST observations in the Surfside-Sunset Borrow Area. Blue circles indicate individual observations. (iNaturalist, February 2023)

Effects Analysis

The 2019 Surfside-Sunset EA noted the presence of several marine mammals and pinnipeds found in the offshore borrow area. Under the Magnuson-Stevens Fishery Management and Conservation Act (MSA), an Essential fish Habitat (EFH) assessment was conducted. The Surfside-Sunset borrow site location is within areas designated for two Fishery Management Plans (FMP): Coastal Pelagics Plan and Pacific Groundfish Management Plan. The EA found that dredging impacts to these species would not occur.

The 2019 Surfside-Sunset EA also noted the absence of any bedrock, reef or surfgrass in the borrow area, therefore no forage opportunity for GST in the immediate area. There is an increased likelihood of GST presence within the Surfside-Sunset borrow area due to nearby foraging resources in Anaheim Bay and Seal Beach National Wildlife Refuge. Potential effects from using this borrow site for the San Clemente Shoreline Protection Project could include direct contact injury from vessel collision. The potential for entrainment would be less likely at Surfside-Sunset Borrow Area compared to Oceanside Borrow Area 2A due to absence of reef habitat in the immediate vicinity. With continued implementation of the minimization and avoidance measures already in place, the USACE does not anticipate any substantive increased impacts to GST beyond those already analyzed for the Oceanside borrow area. Additionally, the 2022 NMFS Concurrence letter for the Sunset Beach Nourishment Project Stage 13 agreed with the USACE finding of Not Likely to Adversely Affect GST for that action. (NMFS, 2023 SEA).

The approximately 50% longer transit distance between Surfside-Sunset and San Clemente increases the potential for GST to occur within the transit corridor. However, given the relatively deep water in which the dredge would be transiting and the presence of onboard monitors, direct collision is highly unlikely

to occur. The monitoring and minimization protocols provided in the BO would continue to be implemented at the Surfside-Sunset borrow area and during transit.

Use of the borrow site at Surfside-Sunset for the San Clemente Shoreline Protection project would not result in substantive new or different effects to GST beyond those already addressed in the Biological Opinion. The USACE anticipates no additional incidental take due to the use of the additional borrow area. Nevertheless, the USACE requests an amendment to the May 2023 biological opinion to address the proposed change in project description.

Proposed Critical Habitat

In July 2023 NMFS published a notice in the Federal Register of Proposed Critical Habitat for Green sea turtle (50 CFR Parts 223, 224, and 226). Because NMFS anticipates issuing a final rule designating critical habitat in summer 2024 and the proposed action could occur during or after such designation occurs, the USACE has elected to conference with NMFS for the proposed critical habitat for the East Pacific Distinct Population Segment of GST to minimize the chance of needing to re-initiate consultation with NMFS. The USACE is requesting conferencing under the Endangered Species Act 50 CFR § 402.10 for proposed critical habitat for GST for the project including the existing approved borrow site, the placement area and the proposed additional borrow site.

Proposed Critical Habitat for the East Pacific DPS of Green Turtles

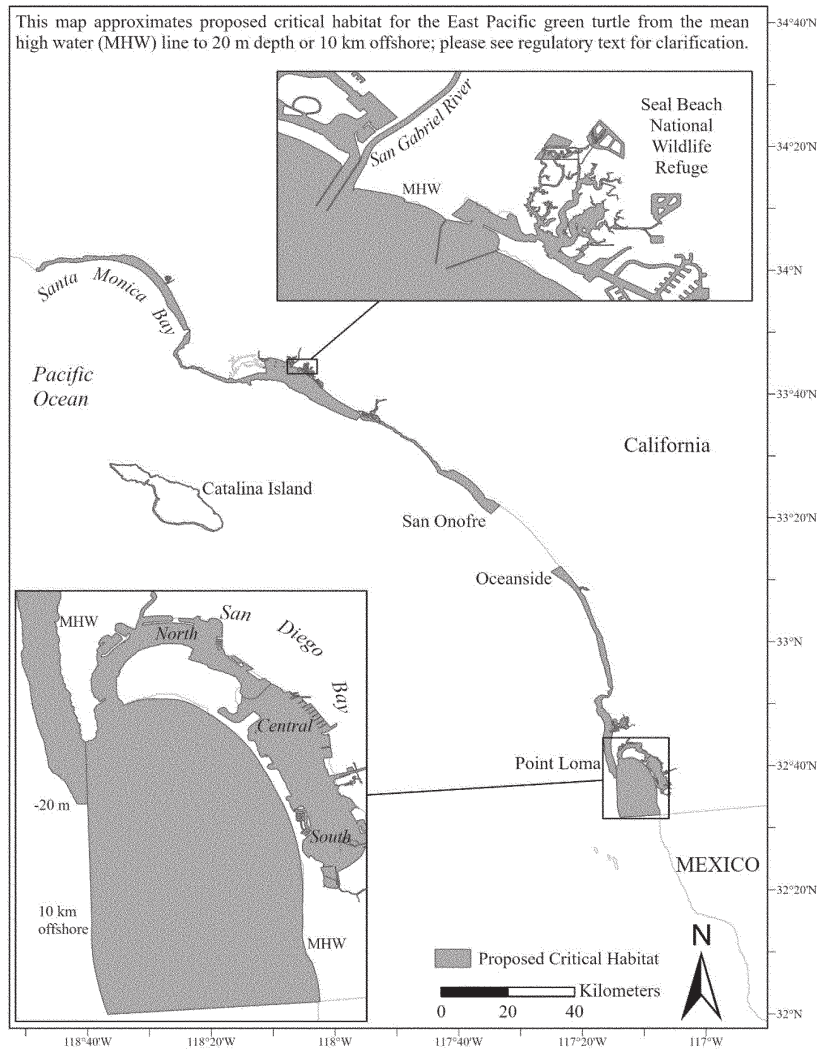


Figure 4. Map illustration of Proposed Critical Habitat for the East Pacific DPS of Green sea turtles. (NMFS, Federal Register, July 2023)

The addition of the Surfside-Sunset borrow area itself would not affect GST proposed critical habitat. The physical or biological features that would provide resting or foraging habitat for GST, including surfgrass, eelgrass and rocky reef are not present.

The Oceanside borrow area 2A contains artificial reef structures that may offer some forage opportunity to GST. The NMFS BO stated “...NMFS believes it is unlikely that green sea turtles routinely utilize the artificial reef modules within the sediment borrow pit given that they are relatively isolated from other significant areas of rocky reef habitat that likely provide more attractive and higher quality foraging and resting support.” (NMFS BO, 2023). On April 18, 2023 the USACE committed to establishing a 300 foot operational buffer between the artificial reef structures. Therefore, continued use of the Oceanside borrow area is not expected to affect GST critical habitat.

Transiting to and from the borrow sites will not affect GST critical habitat or ability for GST to find refuge or to forage, given the benthic behavioral tendency of green sea turtles and the relatively deep water

over which the dredge vessel will be transiting. The temporary presence of the dredge and associated equipment poses a potential but unlikely obstruction to GST movement, given that avoidance measures including onboard monitors will be implemented to minimize that effect. Short-term use of the transit corridor would not change habitat suitability of the open ocean environment.

Sand placement activities at San Clemente Beach may cause temporary impacts to physical and biological features (PBFs) such as rocky reef, surfgrass and invertebrate forage resources that occur offshore of the direct placement area. The impacts may occur if sand migrates beyond the beach and settles on the reef in sufficient quantity and/or for a long enough period such that burial of organisms occurs and GST forage quality is degraded. The NMFS BO stated “...we have concluded the effects associated with nearshore reef sedimentation and/or burial are ultimately not likely to have a detectable impact on the reproduction, numbers, or distribution of the foraging population of ESA-listed green sea turtles in the action area.” (NMFS BO, 2023). The USACE has committed to a project lifecycle monitoring and mitigation regime, including pre- and post-construction monitoring for potential impacts to reef resources. These commitments are enumerated in the 2011 EIS/EIR and 2023 EA.

The USACE finds that GST critical habitat in the San Clemente placement area, if designated, may temporarily be adversely affected should sedimentation on the reef occur. Therefore, the USACE is requesting to Conference on the proposed listing.