## CALIFORNIA COASTAL COMMISSION

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STAFF REPORT: CONSENT CALENDAR

Application No.:

6-95-159

Applicant: City of San Diego Metropolitan

Agent: Kim Lutz

Wastewater Department

Description:

Construction of a two-story, 11,940 sq.ft. Headworks Building Complex and miscellaneous improvements associated with the Headworks, Odor Control and Grit Processing Facilities (HOG)

project.

Lot Area

1,743,341 sq.ft. (40.11 acres)

Building Coverage Pavement Coverage Landscape Coverage

318,682 sq.ft. (18%) 161,585 sq.ft. (9%) 222,507 sq.ft. (13%)

Unimproved Area

1,040,567 sq.ft. (60%)

Parking Spaces

35 Unzoned

Zoning

Public Utility

Plan Designation Ht abv fin grade

55 feet

Site:

Point Loma Wastewater Treatment Plant, 1092 Gatchell Road, Peninsula, San Diego, San Diego County. APN 532-520-06

Substantive File Documents: CCC #6-95-109; 6-85-103; 6-89-217; 6-90-284; Geotechnical Evaluation by Apex Geotechnology, Inc. in Association with Group Delta Consultants, Inc. - 3/10/95; Environmental Impact Report/SCH No. 94-101024 for Point Loma

Wastewater Treatment Plant Master Plan - 10/3/95

# PRELIMINARY STAFF RECOMMENDATION:

The staff recommends the Commission adopt the following resolution:

#### I. Approval with Conditions.

The Commission hereby grants a permit for the proposed development, subject to the conditions below, on the grounds that the development will be in conformity with the provisions of Chapter 3 of the California Coastal Act of 1976, will not prejudice the ability of the local government having jurisdiction over the area to prepare a Local Coastal Program conforming to the provisions of Chapter 3 of the Coastal Act, and will not have any



significant adverse impacts on the environment within the meaning of the California Environmental Quality Act.

## II. Standard Conditions.

See attached page.

## III. Special Conditions.

The permit is subject to the following conditions:

1. Final Plans/Construction Materials. Prior to issuance of the coastal development permit, the applicant shall submit to the Executive Director for review and written approval, final plans for the Headworks Building Complex which document the proposed facility shall be of an earthtone color to blend in with the natural setting of the existing coastal bluffs in the area.

# IV. Findings and Declarations.

The Commission finds and declares as follows:

1. <u>Project Description</u>. Proposed are miscellaneous improvements associated with the Headworks, Odor Control Systems and Grit Removal Systems (HOG) project at the existing Point Loma Wastewater Treatment Plant (PLWTP). The plant is located at the southern end of the Point Loma peninsula in the City of San Diego. The facility provides sewage treatment for various jurisdictions in the San Diego metropolitan area. Cabrillo National Monument is located to the south of the plant and U.S. Navy-owned lands are to the north and east. The Pacific Ocean lies to the west of the project site and San Diego Bay to the east of the site.

The HOG project site will be located at the northern end of the PLWTP. Some of the proposed improvements are repair and maintenance activities which are exempt from coastal development permit requirements. However, most of what is proposed consists of new structures and/or improvements which are not subject to the repair and maintenance guidelines for public works projects. Those aspects of the subject proposal which require a permit are discussed below followed by a brief description of those elements which are part of the HOG project, but exempt from permit requirements, and not a part of the subject permit.

The largest aspect of the new development proposed is construction of a two-story, 11,940 sq.ft. Headworks Building Complex (HBC) which will house process equipment and serve as an electric cart storage garage. It will also provide quarters for offices and control rooms. The building will be above ground and approx. 55 feet high.

Also proposed are scum removal process improvements, consisting of construction of two scum concentrators which will collect scum from the primary sedimentation basins. The scum concentrators will have a footprint of 190 sq. ft. and a height of 15 feet above grade. Also proposed is the

construction of a 200 sq.ft. motor control center building. As part of the Accelerated Odor Control improvements, Odor Removal System (ORS) Nos. 1 and 6 will be demolished and removed and a new ORS No. 9 and new chemical storage facility will be constructed. The packed towers associated with the new ORS unit and the chemical storage facility will be 5,150 sq.ft. in size and a maximum of 27 feet high above grade.

The applicant proposes to demolish the existing water softener system and construct a similar slightly larger system in the same location. This will include constructing two 6-ft. high water softener tanks. An existing tool shed will be demolished and a concrete pad will be constructed for placement of a bulk salt storage tank for the water softener. The height of the bulk storage tank is 15 feet above grade.

Grit removal systems improvements include construction of a new 2,900 sq.ft. pump gallery/room below ground for the below-ground south grit basins which will be replaced with new tanks of the same size in the same location (see below). An existing aerated grit tank blower building will be demolished and replaced with a 900 sq.ft. blower enclosure which is part of the Headworks Building Complex. The final portion of the development includes constructing a new pipe gallery connecting the existing main pipe gallery with the new HBC. It consists of a new underground tunnel approximately 10 feet high and 12 feet wide.

The following portions of the subject proposal are exempt from permit requirements because they involve replacement or maintenance of existing facilities which do not alter the service capacity, do not involve construction of new roads, grading of undisturbed area of greater than 500 sq.ft., or removal of major vegetation. They are described herein for information purposes only.

Also proposed is replacement of influent screening and conveyance facilities within the same building footprint. The scum removal process improvements consist of placement of existing scum collection equipment on the primary sedimentation basins. Accelerated odor control improvements consist of replacement of internal equipment on the caustic wet scrubbers and carbon towers along with replacement and extension of 36-inch diameter ducting. The ducting improvements would be located on the deck of the primary sedimentation basins. Also proposed is replacement of the gates at the head of the plant and concrete restoration of influent channels, flumes, primary sedimentation basins and other existing deteriorated concrete. Numerous stop gates at the north end of the plant would be replaced with new gates of the same size and placed in the same locations as the existing gates. All aspects of the concrete restoration would be below grade.

Grit removal systems improvements consist of demolishing and removing the existing below-ground south grit tanks and replacing them with tanks which are the same size and height in the same location. Related grit removal system improvements include replacing the piping in the north and central grit basins. Lastly, also proposed is installation of a digester cleaning system below grade inside the digesters or Headworks Building Complex.

2. <u>Geologic Hazards/Shoreline Erosion</u>. Coastal Act Section 30253 states, in part:

New development shall:

- (1) Minimize risks to life and property in areas of high geologic, flood and fire hazard.
- (2) Assure stability and structural integrity, neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs. ...

Most of the proposed improvements, except for the removal of Odor Control System No. 6, are located well inland approximately 300 feet away from the coastal bluffs. A geology report was submitted, nonetheless, which addressed the geologic integrity of the site and concluded the site was stable to support the new development. In addition, a detailed geology report was prepared for the subject site in May, 1988, when extensive shoreline protective devices were proposed for the existing sewage treatment facilities (CDP #6-89-217). Included in that report is the delineation of a 75-year bluff retreat line. This projected line was based on a combination of on-site soil studies and research of over a hundred years of maps and photographs of the area, and was coordinated between local, state and federal geologists. Therefore, it is believed that the depicted 75-year bluff retreat line represents a scientifically-sound projection of future site conditions.

The entire Point Loma Wastewater Treatment Plant is sited on a broad shelf, midway down the bluff-face from the top of the Point Loma peninsula. Some of the existing facilities are in close proximity to the bluff edge, and the outfall itself extends seaward down the bluff then underwater approximately two miles out to sea. The proposed development for construction of a Headworks Building Complex (HBC) and related improvements, will all be well landward of the bluff retreat line.

The proposed facilities will be located on the east side of First Street at the northern end of the plant site. Just past the security gate entrance to the plant site, there are three primary roads on which the majority of the improvements are situated. First Street is the road furthest to the west and closest to the coastal bluffs. Second Street is more inland to the east, and Third Street is the easternmost street. The proposed improvements will be sited on the east side of First Street at some distance from the coastal bluffs (more than 300 feet) and there is other development between the project site and the ocean.

It has been documented in earlier permits for this site that the entire facility is located in an area which is extremely environmentally and geologically sensitive. Any improvements to the facility must be reviewed carefully in order to assure that impacts do not occur to fragile coastal

resources. Under CDP #6-89-217, shoreline protection improvements were permitted to stabilize the bluffs west of the facility and to protect existing development. However, the proposed improvements herein should not warrant the construction of any future shoreline protection devices, pursuant to Coastal Act Section 30253. In summary, due to the siting of the proposed improvements being landward of the bluff retreat line, it can be found that the project should not result in any geologic impacts and the proposal can thus be found consistent with Section 30253.

3. <u>Shoreline Access.</u> Coastal Act Sections 30211 and 30212 provide, in part:

### Section 30211

Development shall not interfere with the public's right of access to the sea where acquired through use or legislative authorization, including, but not limited to, the use of dry sand and rocky coastal beaches to the first line of terrestrial vegetation.

#### Section 30212

- (a) Public access from the nearest public roadway to the shoreline and along the coast shall be provided in new development projects except where:
  - (1) it is inconsistent with public safety, military security needs, or the protection of fragile coastal resources,
  - (2) adequate access exists nearby, ...

Currently, there is no public access to the shoreline at the project site. The shoreline presently consists of rocky headlands interspersed with the previously constructed revetments. Due to the revetments and the rocky headlands, lateral access opportunities have been relatively non-existent at the subject site since the time of plant construction. Also, due to the nature of the sewage treatment facility, public use of the area is restricted. With construction of the proposed HOG project and related improvements, shoreline access will not be further diminished.

Additionally, to the north of the project site are Navy owned lands which prohibit public access along the shoreline. To the south is the Cabrillo National Monument which encourages public access to the tip and westerly side of Point Loma. Parking lots and shoreline viewing areas are available at the Monument and along the access road south of the treatment plant facility, but only limited access to the shoreline is allowed because of the sensitive marine resources found at the base of the bluffs. The Monument offers guided tours of the tide pools, which does allow the public the opportunity to view inter- and sub-tidal marine life.

For this project site only, it is inappropriate to require public access along the shoreline due to the presence of revetments (CCC# 6-89-217) which

encompass the entire beach zone (rocky, cobble beach) into the inter-tidal zone, sensitive marine resources (i.e, surfgrass) located within the interand sub-tidal areas, and public safety concerns due to the nature of the existing sewer treatment operations. Furthermore, adequate public access and recreational opportunities are available at the adjacent Cabrillo National Monument. Therefore, the Coastal Commission finds the proposed project consistent with the cited sections of the Coastal Act, and with all other public access and recreation policies of the Coastal Act as well, as required in Section 30604(c) of the Act for any site that is located between the first coastal road and the sea.

# 4. Growth Impacts. Section 30254 of the Act states, in part:

"New or expanded public works facilities shall be designed and limited to accommodate needs generated by development or uses permitted consistent with the provisions of this division..."

All of the proposed improvements are intended to improve the operations at the plant facility associated with controlling odors, removing scum, etc., as opposed to accommodating redevelopment or new growth in the area beyond what has been planned for in the City's certified LCP. Treatment capacity is governed by the size and number of sedimentation basins and outfall capacity. It is estimated that the plant is presently operating at 180 MGD (million gallons per day), however, each of the sedimentation basins can treat approx. 20-22 MGD of influent for a maximum total of 240 MGD which is the ultimate design capacity for the facility. No modifications to the basins—other than maintenance and repairs—are proposed as part of the project and no increases to the maximum capacity of the plant will occur as a result of the proposed project. As such, the project will not increase treatment capacity and will not induce further growth. The Commission therefore finds the proposed development consistent with Section 30254 of the Act.

5. <u>Visual and Scenic Resources</u>. Coastal Act Section 30251 provides, in part, that the scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance and that new development shall be visually compatible with the character of surrounding areas. Portions of the PLWTP are within the viewshed of Cabrillo National Monument, and the facility is highly visible from offshore. As noted in the EIR for the subject project, including detailed line-of-sight cross-sections, the specific HOG project site will not be visible from the Point Loma Cabrillo National Monument to the south of the project site due to intervening topography.

As noted in the project description, the project will be located on the east side of First Street. According to the applicant, much of the proposed improvements will be shielded from public views from the west due to the existence of other treatment plant development located between the proposed improvements and the coastal bluffs. The only aspect of the proposed improvement which will be visible from the west is the new Headworks Building Complex. Although this structure will be a notable addition to the treatment plant which will be visible within two miles from shore, the applicant is

proposing to paint the exterior of the proposed structure an earthtone color in order to blend in with the color of the natural surrounding areas along the hillside and bluffs and reduce any adverse visual impacts associated with the structure. In addition, demolition of Odor Removal System (ORS) No. 6, which is presently highly visible and and situated near the coastal bluffs directly above the existing Hydro-Electric building, will greatly improve the plant appearance from the ocean.

Although the applicant has proposed an earthtone finish for the Headworks Building, the submitted plans do not reflect this intent. Therefore, Special Condition #1 has been attached requiring the applicant to submit final plans which indicate the proposed Headworks Building Complex facility shall be of an earthtone color in order to blend in with the surrounding coastal bluffs. With requirements for color treatment, any potential adverse visual impacts associated with the completed development will be significantly reduced. The Commission, therefore, finds the project, as conditioned, consistent with Section 30251 of the Coastal Act.

6. Local Coastal Planning. Section 30604 (a) also requires that a coastal development permit shall be issued only if the Commission finds that the permitted development will not prejudice the ability of the local government to prepare a Local Coastal Program (LCP) in conformity with the provisions of Chapter 3 of the Coastal Act. In this case, such a finding can be made for the proposed project, as conditioned.

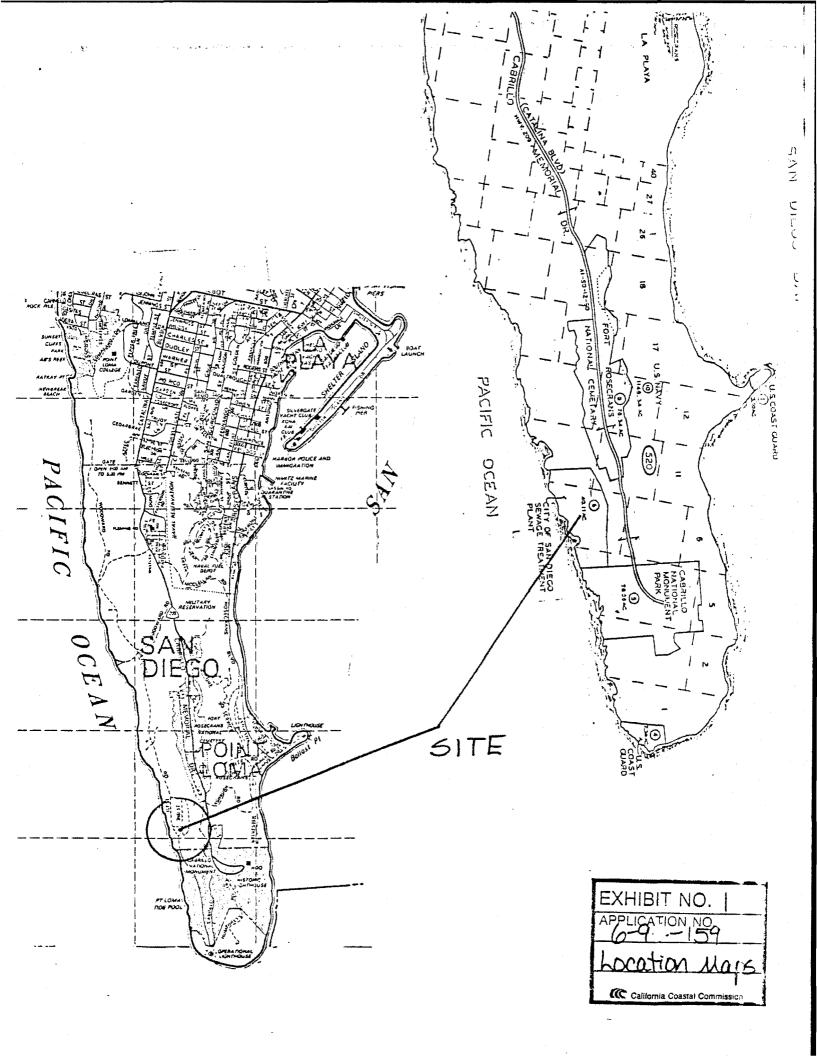
The subject site is located within the unzoned geographic area included in the Peninsula land use plan segment of the City of San Diego Local Coastal Program, which designates the property as Public Utility. The Point Loma Wastewater/Sewage Treatment Plant has existed on the site since 1963. This area was not included in the City of San Diego's certified Local Coastal Program, and the Commission retains permit jurisdiction over the site at this time. Pursuant to the above findings, the Commission finds the proposed development, as conditioned, to be consistent with all applicable Chapter 3 policies of the Coastal Act. Therefore, approval of the project, as conditioned, should not prejudice the ability of the City of San Diego to implement its certified LCP or to continue developing a certifiable Master Plan for the facility.

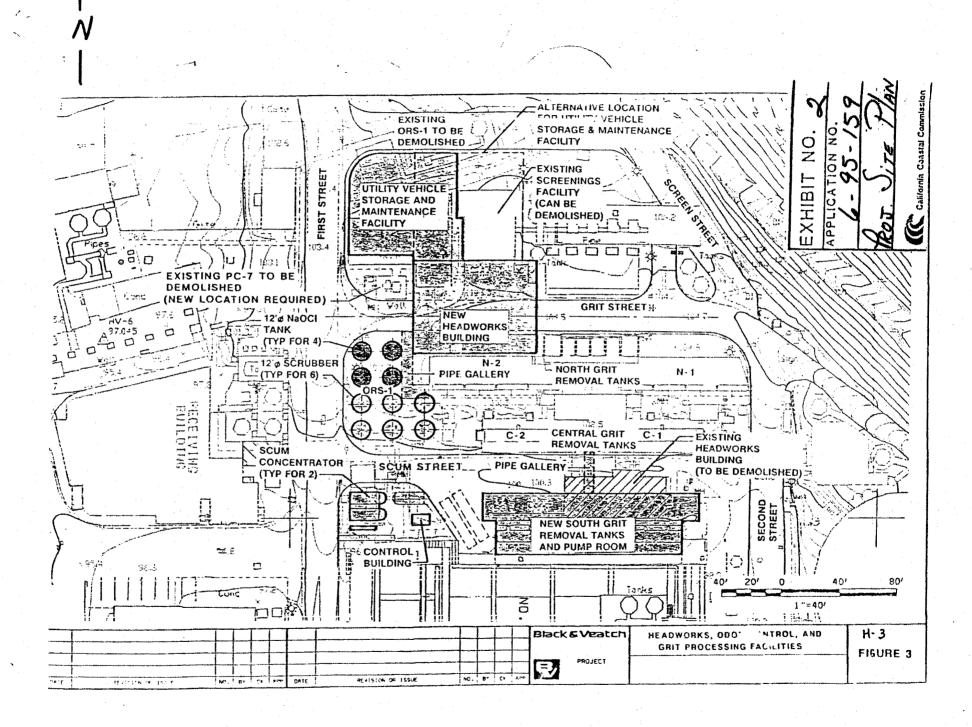
7. Consistency with the California Environmental Quality Act (CEQA). Section 13096 of the Commission's Code of Regulations requires Commission approval of coastal development permits to be supported by a finding showing the permit to be consistent with any applicable requirements of the California Environmental Quality Act (CEQA). Section 21080.5(d)(2)(i) of CEQA prohibits a proposed development from being approved if there are feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment.

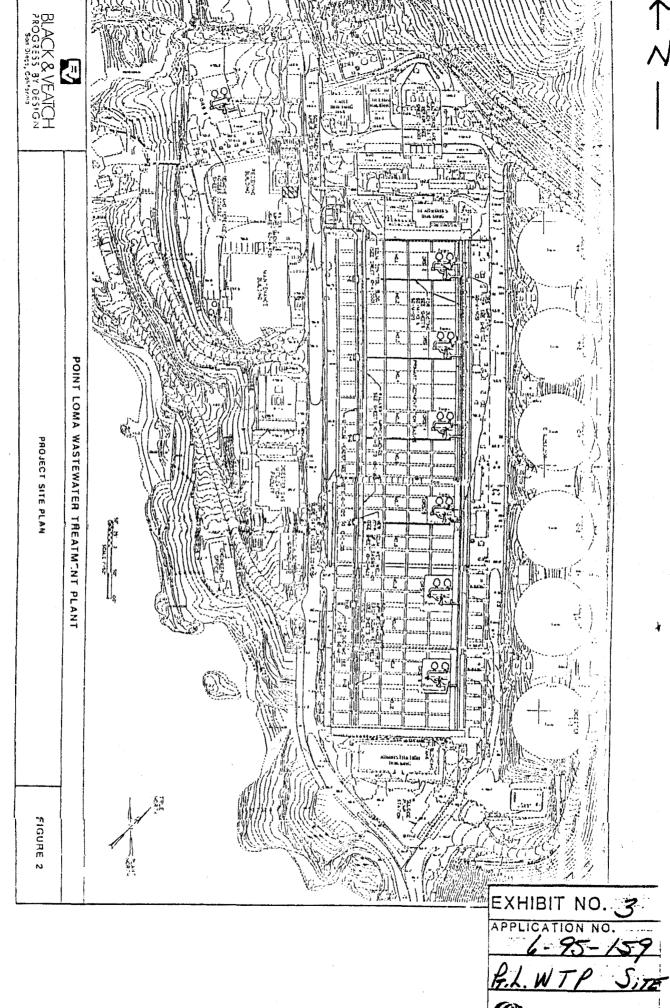
The proposed project has been conditioned in order to be found consistent with the visual resource policies of the Coastal Act. Mitigation measures, including a condition addressing color of construction materials, will minimize all adverse environmental impacts. As conditioned, there are no

feasible alternatives or feasible mitigation measures available which would substantially lessen any significant adverse impact which the activity may have on the environment. Therefore, the Commission finds that the proposed project is the least environmentally-damaging feasible alternative and can be found consistent with the requirements of the Coastal Act to conform to CEQA.

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