

CALIFORNIA COASTAL COMMISSION

SAN DIEGO COAST AREA

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Hearing Date: December 9-12, 1997

STAFF REPORT: CONSENT CALENDAR

Application No.: 6-97-124

Applicant: City of San Diego, Metropolitan
Wastewater Department

Agent: Kim Lutz

Description: Construction of Digesters 7 & 8 and associated one-story, 3,748 sq.ft. control building, new low pressure gas holding (LPGH) tank facility, retaining wall and crib wall, landscape berm, extension of Third Street, and addition of five parking spaces along Second Street.

Lot Area	1,743,341 sq. ft. (40.11 acres)
Building Coverage	308,382 sq. ft. (18%)
Pavement Coverage	171,885 sq. ft. (10%)
Landscape Coverage	222,507 sq. ft. (13%)
Unimproved Area	1,040,567 sq. ft. (59%)
Parking Spaces	38
Parking Spaces	35
Zoning	Unzoned
Plan Designation	Public Utility
Ht abv fin grade	40' (digesters); 30' (control bldg.)

Site: Point Loma Wastewater Treatment Plant, 1902 Gatchell Road, Point Loma, San Diego, San Diego County. APN 532-520-06

Substantive File Documents: CCC #6-95-103; 6-95-159; 6-89-217; 6-90-284; Geotechnical Evaluation by Ninyo and Moore dated 6/20/95; Letter from Group Delta Consultants, Inc. dated 8/10/95; Draft Environmental Impact Report - Point Loma Wastewater Treatment Plant Digesters 7 and 8 and Associated Facilities/SCH #95011057 dated 5/22/95

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. Landscaping Plan/Crib Wall. Prior to the issuance of the coastal development permit, the applicant shall submit a detailed landscape plan, which shall be subsequently implemented, for the proposed crib wall indicating the type, size, extent and location of all plant materials, the proposed irrigation system and other landscape features. Drought tolerant native or naturalizing plant materials shall be utilized to the maximum extent feasible. Special emphasis shall be placed on the installation of plant elements at the top of the proposed crib wall to visually buffer the proposed wall. Said plan shall be submitted, reviewed and approved in writing by the Executive Director.
2. Revised Storm Drain Plans. Prior to the issuance of the coastal development permit, the applicant shall submit to the Executive Director for review and written approval, revised plans, which shall be subsequently implemented, for the installation of a storm drain system along Gatchell Road, south of First and Second Streets. The revised plans shall indicate that the proposed storm drain alignment will be sited easterly of the projected 75-year bluff-top retreat line and will also incorporate a reduced pipe depth to avoid conflicts with the existing tie-back wall anchors, pursuant to the findings of updated Geology Report by Group Delta, dated 8/11/95.
3. Monitoring Program for On-Site Mitigation of Construction of Landscape Berm. Prior to the issuance of the coastal development permit, the applicant shall agree to comply with a detailed monitoring program for the landscape berm, consistent with the Draft Environmental Impact Report DEP No. 95-0159 dated May 23, 1995 (pages 4-56 through 4-60). Annual monitoring reports on the extent of coverage and rate of growth on the berm, shall be submitted to the Executive Director for review and written approval for five years following project implementation.
4. Drainage/Erosion Control Plan. Prior to the issuance of the coastal development permit, the applicant shall submit a drainage/erosion control plan to the Executive Director for review and written approval. Said plan shall document that all runoff from the project site as a result of construction of the new digesters and grading for the landscaped berm shall be collected and appropriately discharged into an existing street drainage system and away from

the coastal bluffs. Any runoff directed over the bluffs shall be retained and discharged at a non-erosive velocity (less than 6 cfs) and elevation in order to protect the scenic resources and habitat values of the coastal bluffs from degradation by scouring or concentrated runoff. The drainage/erosion control plan shall be implemented in association with the approved plans.

5. Waiver of Liability. Prior to the issuance of the coastal development permit, the applicants shall submit a signed document which shall indemnify and hold harmless the California Coastal Commission, its officers, agents and employees against any and all claims, demands, damages, costs, expenses of liability arising out of the acquisition, design, construction, operation, maintenance, existence, or failure of the permitted project.

IV. Findings and Declarations.

The Commission finds and declares as follows:

1. Background Information/Project Description. The proposed project is identical to the development previously approved by the Commission under CDP #6-95-103 on 9/14/95. Recently, it came to the City's attention that their permit had expired on 9/14/97 and the ongoing construction of the project was not authorized under a valid permit. Thus, the City has submitted the subject permit application for the same development proposal which was previously approved by the Commission. Development which has already taken place on the site was done in apparent violation of the Coastal Act.

Proposed is the construction of two new digesters (#s 7 & 8), a two-story, 3,748 sq.ft. control building for the new digesters, new low pressure gas holding (LPGH) tank facility, construction of a landscape berm, a tieback retaining wall and crib wall and addition of five parking spaces along Second Street at the Point Loma Wastewater Treatment Plant. Also proposed is an extension of Third Street in a southerly direction for a linear distance of approx. 400 feet to rejoin Gatchell Road, and storm drain system on Gatchell Road south of First and Second Streets. The road extension will provide access to the new waste gas burner units, LPGH building, Digesters 7 & 8 and control building and will be in a general alignment with the existing roadways at the treatment plant. Proposed Digester 7 will be 100 feet in diameter with a side wall depth of 45 feet. Digester 8 would be 125 feet in diameter with a side wall depth of 42 feet. Above ground height for both tanks would range from 12 feet adjacent to the slope (to the east) to 40 feet at 2nd Street. The proposed control building will be situated between the two tanks and will be 30 feet high and two-stories as viewed from the west, and one-story from the east totaling to 3,748 sq.ft.

According to the site-specific geology report, Digesters 7 and 8 will be located at the southern portion of the treatment plant facility approx. 225 feet and 90 feet, respectively, from the existing top-of-bluff. In addition, with the exception of the proposed storm drain system within the right-of-way of Gatchell Road, none of the other proposed improvements will be located any closer than 90 feet to the bluff edge. A total of 84,000 cy. of balanced cut and fill grading is proposed in conjunction with construction of the

landscaped earthen berm and installation of a retaining wall/crib wall.

According to the San Diego Metropolitan Wastewater Department, the purpose of the project is to expand the plant's existing sludge digester capacity to accommodate requirements of federal regulations at 40 Code of Federal Regulations (CFR) Part 503 (effective 1993) and the relocation of the Fiesta Island sludge drying beds to the Fiesta Island Replacement Project/North Sludge Processing Facility (FIRP/NSPF) by 1996.

The Coastal Commission has mandated that the existing sludge drying operations at Fiesta Island must be relocated by April 1998. To meet this mandate, the Point Loma Sludge Pumping Station (PLSPS) project will pump digested sludge from Point Loma to FIRP/NSPF. As part of the proposed project, there is a requirement for sludge storage. As the existing sludge digester capacity has already been determined to be inadequate to meet 40 CFR, Part 503, the need for increased biosolids storage at the PLWTP is intensified. Initial operation of Digesters 7 and 8 will be to function as single stage primary digesters to be used in conjunction with the existing digesters. This will allow the upgrading and repair of the existing system and also allow the plant to meet the current regulations. While Digester 8 will be used simultaneously, and in conjunction with the other tanks, the ultimate operation of Digester 7 is to function as the sludge storage tank for the PLSPS. In so doing, two additional days of sludge storage can be provided with a greater operational flexibility and emergency storage for the PSLSP. Digester 7 will also function as a temporary replacement for existing primary digesters when one is placed off line for routine maintenance.

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 the 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.

2. No Waiver of Violation. Although development has taken place prior to submission of this permit application, consideration of the application by the Commission has been based solely upon the Chapter 3 policies of the Coastal Act. Approval of the permit does not constitute a waiver of any legal action with regard to this violation of the Coastal Act that may have occurred; nor does it constitute admission as to the legality of any development undertaken on the subject site without a coastal development permit.

3. Geologic Hazards/Shoreline Erosion. Coastal Act Section 30253 state, in part, that new development should minimize risks to life and property in areas of high geologic, flood and fire hazard and should also assure stability and structural integrity of the site. New development should not cause significant erosion or require the construction of protective devices that would substantially alter natural landforms along bluffs and cliffs.

In addition to the geology report submitted with the subject coastal development permit application, a more 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 which 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 a mile or more out to sea. The proposed development for construction digesters 7 and 8, control building, tie back retaining wall and crib wall, landscape earthen berm, parking area, will all be well landward of the bluff retreat line.

As noted previously, the proposed Digesters 7 and 8 will be sited an approx. distance of 225 and 90 feet, respectively, from the bluff edge. A geologic investigation completed for the proposed development states, in summary, that the proposed improvements will not have an adverse impact on coastal bluff stability or increase coastal erosion.

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, referenced above, 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.

As part of the proposal, the applicant is also installing a storm drain system along the westerly side of Gatchell Road. The system is presently designed to tie into the existing 33-inch diameter angle-bored storm drain pipe installed in 1992 as part of the shoreline protection project. However, as identified in the updated geology report, the northerly approx. 20 feet of the proposed new storm drain and its northerly cleanout encroach seaward of the projected 75-year blufftop retreat line. In addition, the design also requires a relatively deep excavation to construct the proposed connection between the existing angle-bored storm drain and the proposed new storm drain. The excavation, in turn, appears to interfere with the tieback anchors of the existing tie-back wall. In discussions between the geologist and applicant, the applicant has agreed to modify the storm drain alignment so that it will be relocated approx. 25 eastward of the bluff-retreat line and to alter the excavation plan so as not interfere with the foundation for the tie-back wall. For this reason, Special Condition #2 has been attached requiring submittal of revised storm drain plans which are consistent with the findings of the updated geology report.

Also, due to the inherent risk of shoreline development and the Commission's mandate to minimize risks, Special Condition #5 for a waiver of liability has been attached. By this means, the applicant is notified of the risk and the Commission is relieved of liability in permitting the development.

In summary, since all of the proposed improvements are being proposed to be sited landward of the bluff retreat line, and as conditioned for plans indicating the realignment of the storm drain improvements pursuant to the recommendations contained in the site-specific geology report, it can be found that the project should not result in any geologic impacts. Therefore, the proposed project can be found consistent with Section 30253.

4. Shoreline Access. Coastal Act Sections 30211 and 30212 provide for the protection of public access. The latter section specifically addresses provision of access between the nearest public roadway and the shoreline. 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 pump station and related improvements, shoreline access will not be diminished beyond that which currently exists.

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 inter and sub-tidal areas, and that adequate access is available at the adjacent Cabrillo National Monument.

However, it must be noted that the Cabrillo National Monument, to the south of the project site, has indicated concern over the effect construction traffic may have on public safety for those individuals who utilize Cabrillo Road for recreational pursuits such as walking, running, or bicycling. Since both the Monument and Point Loma Wastewater Treatment Plant use the same access road that leads to the tide pools within the confines of the national park, there is the potential for some conflicts with pedestrian use on this road. In response to this concern, the applicant has indicated that the construction traffic is considered to be minor and for this reason, potential impacts to pedestrians is expected to be minimal. The construction of Digesters 7 and 8 will generate approx. 15 trips per day--which is a portion of the overall traffic generated during the construction schedule for the plant facility. However, the applicant has stated that all contractors are required to take certain safety measures to avoid potential impacts to pedestrians or cyclists. Such measures include limiting trips during peak hours, use of flagmen, and reducing speeds on the access roads. Therefore, the proposed

project can be found consistent with Sections 30211 and 30212 of the Coastal Act.

5. 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..."

As cited in the previous finding, the proposed central boiler facility is being designed to comply with federal regulations. The subject proposal will facilitate this process and is not being proposed to accommodate 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, however, each of the sedimentation basins can treat approx. 20-22 MGD of influent for a maximum total of 240 MGD which is what the facility is designed for. No modifications to the basins 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 result in growth inducement. The proposed development, is thus consistent with Section 30254 of the Act.

6. Visual and Scenic Resources. 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. The project will be located on the east side of Third Street. The project site will be visible from the Point Loma Cabrillo National Monument to the south of the project site. The draft Environmental Impact Report prepared for the project thoroughly analyzed the issue of visual impacts associated with the proposed project and identified the specific viewpoints at the Cabrillo National Monument from which the new development could be seen. Specifically, in connection with CDP #6-94-159, approved in December of 1994, for the construction of a pump station at the treatment plant facility, the applicant was required to construct a berm with landscaping to buffer views of the pump station from the Cabrillo National Monument. Due to concerns from the CNM regarding views of not only the pump station but the future digesters as well, the City designed the earthen landscaped berm so that it will completely screen the digesters from view from the south.

The grading to create the berm is proposed to commence immediately following the excavation for proposed Digesters 7 and 8, as well as excavation for the pump station which was approved pursuant to CDP #6-95-159. Upon consultation with the California Department of Fish and Game, it was confirmed that the vegetation to be planted on the berm, maritime succulent scrub, takes three to five years to fully mature. At one year, some vegetative growth will be visible, with more vegetation appearing at two years. At three years, the vegetation should be approx. 50% mature and more bushy and dense in appearance on the berm. However, it is important to note that the proposed berm is

intended to completely screen all views of the proposed digesters 7 & 8 as well as the pump station (CDP #6-94-159) and central boiler facility (CDP #6-95-109) from the south at the Cabrillo National Monument.

As part of the proposed project, the applicant also intends to construct a 560 linear foot tieback retaining wall starting between digester S1 and S2 in southerly direction to a distance of approx. 110 feet south of Digester 8 that varies in height from six to 23 feet (with an average of approx. 10-11 feet.) Continuing south from this tieback wall also proposed is a 563 linear foot crib wall that varies in height from 3 to 33 feet (with an average height of approx. 24-25 feet). The crib wall and retaining wall are necessary to hold back the fill material for the construction of the landscape berm.

The proposed tie-back retaining wall that will be constructed along the east side of Third Street and the east side of Gatchell Road is also proposed to be brown in color and textured to blend in with the adjacent hillside. With regard to the proposed crib wall, which will be located south of the retaining wall, the proposed design is a straight vertical wall was opposed to one that is placed in step-like fashion with various tiers. For this reason, the design does not allow for planting on the wall itself. In addition, there is insufficient room to plant to the west between the crib wall and Third Street. However, the applicant has indicated a willingness to install plant elements on top of the crib wall which will consist of a gentle slope. Special Condition #1 has been attached which requires landscape plans to this effect in order to visually buffer and soften the effect of the crib wall as viewed from the west.

In addition, the project site will be visible from the west by off-shore ships and boats. The applicant has indicated that the western elevation of the proposed control building will be landscaped (1,739 sq.ft.). The applicant has submitted a landscape plan with the proposed project which includes drought tolerant, California species native to the San Diego coastline with special emphasis on screening the building as viewed from the west. The applicant has submitted final plans for the proposed digesters, control building, and retaining and crib walls. With the proposed landscaping, any potential adverse visual impacts associated with the completed development will be significantly reduced. The project, is, therefore, consistent with Section 30251 of the Coastal Act.

7. Environmentally Sensitive Resources. Section 30240 calls for the protection of environmentally sensitive habitat areas. The main construction site is located at the southern edge of the PLWTP and is approx. 7.08 acres in size. The main construction site also includes disturbed areas of the treatment plant facility such as an abandoned stockpile site, more commonly known as, "the boneyard". The majority of this area is paved, bare, and developed and is also the area where the landscape berm will be constructed. While no impacts to any sensitive wildlife habitat is expected to occur as a result of the proposed project, there will be impacts to biological resources. Native vegetation consisting of high-quality maritime succulent scrub (MSS), exists on the slopes south and east of the PLWTP. Approx. 4.24 acres of maritime succulent scrub are located within the construction area and

would be directly impacted as a result of the proposed project. In addition, 38 snake chollas cactus would also be directly impacted. These impacts are considered to be significant, as identified in the DEIR. For this reason, the Department of Fish and Game has reviewed the proposal for consistency with the Natural Community Conservation Program (NCCP). In this particular case, the City of San Diego's Multiple Species Conversation Program is an equivalent to the NCCP which has been reviewed by the Department of Fish and Game and the City and it has been determined that the project would meet the requirements of this program by providing approx. 12 acres of maritime succulent scrub as mitigation.

The City is being required by the City Development Services Department to mitigate the impacts to the maritime succulent scrub plant species at a ratio of 3:1. As such, approx. 12.72 acres of maritime succulent scrub is proposed for mitigation. Approx. 4.4 acres of the mitigation would be satisfied by the onsite revegetation of the berm. The additional 8.32 acres of mitigation will be satisfied at an off-site location in Otay Mesa which is in south San Diego and outside of the coastal zone. Additionally, the snake cholla (in addition to San Diego barrel cactus) are proposed to be salvaged prior to grading and replanted as part of revegetating the berm. The salvaging and replanting of the snake cholla cactus would reduce the impacts to this species to a level of below significance. As identified in the DEIR, the maritime succulent scrub is highly sensitive and as a result, it would take approx. 3-5 years for this type of vegetation to mature and provide valuable habitat.

Upon consultation with the California Department of Fish and Game (CDFG), the impact to this sensitive species was found to be acceptable provided that such impacts were mitigated, as is proposed. The City proposes an extensive monitoring program, as outlined in the Draft Environmental Impact Report, to assure that the MSS thrives and matures as expected. Special Condition #3 has been attached which requires the applicant to comply with the monitoring requirements of the DEIR and that annual results of the monitoring report be submitted to the Commission for review.

The Commission has not established a specific ratio to mitigate impacts to coastal sage habitat. Since passage of the Natural Community Conservation Program (NCCP), the Commission has sought to assure consistency with the NCCP process, by requiring the Department of Fish and Game (DFG) and U.S. Fish and Wildlife Service (USFW) approval of any proposed impacts to environmentally sensitive habitat areas and required mitigation. Through such assurance, the Commission can find the project meets the requirements of Section 30240 of the Act. The City and DFG has found that, with the proposed mitigation, the project is consistent with the NCCP process and is thus consistent with Section 30240.

In addition, with respect to potential impacts on downstream resources, the project site within the treatment plant is located quite close to the ocean. Grading is proposed in association with construction of the landscape berm as well to create a staging area and level pad for parking of construction vehicles immediately west of the berm. An extension of Third Street in a southerly direction to rejoin with Gatchell Road is also planned. However,

the City intends to install a berm drainage system which will be integrated with the existing drainage system which will serve to avoid increased erosion of bluffs and cliffs located downstream. The majority of the runoff from the project site would be channeled into the existing storm drain system and then routed to the existing drainage outlets at the shoreline west of the treatment plant. In addition, the City is proposing to install a storm drain system along Gatchell Road which will be immediately to the west of the proposed berm. As discussed in a previous finding, the project is being conditioned to relocate the storm drain system to the east side of Gatchell Road to avoid any interference with the existing structural tiebacks for shoreline protection which lies to the west along the coastal bluff.

The proposed project would also result in potential for on-site erosion and sedimentation due to exposure of graded areas during construction activities. This would be greatest during mass grading for the project and the initial development of the berm. However, the applicant intends to implement erosion/sedimentation measures which will include provisions such as covering of stockpile areas, landscaping/hydroseeding graded slopes, and stabilizing graded areas. Sedimentation control measures will include placement of sand bags, silt fences, and/or hay bales on the downstream edge of construction areas, and placement of sedimentation basins at drainage inlets. As noted in the Draft EIR for the project, no significant long-term impacts to surface water quality is expected to occur since very little paved area will be added to the project. Therefore, Special Condition No. 4 has been attached which requires submittal of drainage/erosion control plans to assure such measures are implemented so that no adverse impacts to downstream resources occurs. As conditioned, project approval should not create any significant downstream siltation or off-site impacts. Therefore, in summary, as conditioned to to comply with the monitoring requirements that are consistent with the DEIR, to submit revised storm drain plans for Gatchell Road, and drainage/erosion control plans, the proposed project can be found consistent with Section 30240 of the Act.

8. 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.

The subject site is located within the unzoned geographic area included in the Peninsula segment of the City of San Diego Local Coastal Program and has contained the Point Loma Wastewater/Sewage Treatment Plant 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.

9. 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, as conditioned, 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 public access policies of the Coastal Act. Mitigation measures, including conditions addressing landscaping of crib wall, revised storm drain plans, drainage/erosion control plans and implementation of monitoring conditions consistent with the requirements of the Draft Environmental Impact Report for the on-site mitigation and planting of maritime coastal scrub on the berm, 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.

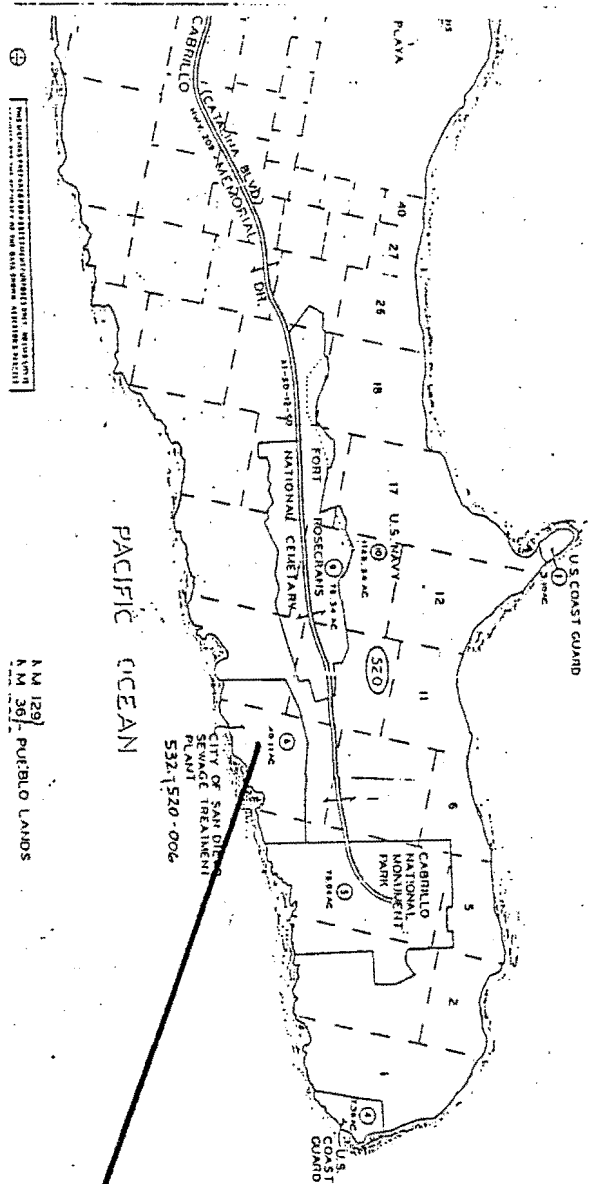
STANDARD CONDITIONS:

1. Notice of Receipt and Acknowledgement. The permit is not valid and development shall not commence until a copy of the permit, signed by the permittee or authorized agent, acknowledging receipt of the permit and acceptance of the terms and conditions, is returned to the Commission office.
2. Expiration. If development has not commenced, the permit will expire two years from the date on which the Commission voted on the application. Development shall be pursued in a diligent manner and completed in a reasonable period of time. Application for extension of the permit must be made prior to the expiration date.
3. Compliance. All development must occur in strict compliance with the proposal as set forth below. Any deviation from the approved plans must be reviewed and approved by the staff and may require Commission approval.
4. Interpretation. Any questions of intent or interpretation of any condition will be resolved by the Executive Director or the Commission.
5. Inspections. The Commission staff shall be allowed to inspect the site and the development during construction, subject to 24-hour advance notice.
6. Assignment. The permit may be assigned to any qualified person, provided assignee files with the Commission an affidavit accepting all terms and conditions of the permit.

7. Terms and Conditions Run with the Land. These terms and conditions shall be perpetual, and it is the intention of the Commission and the permittee to bind all future owners and possessors of the subject property to the terms and conditions.

(7124R)

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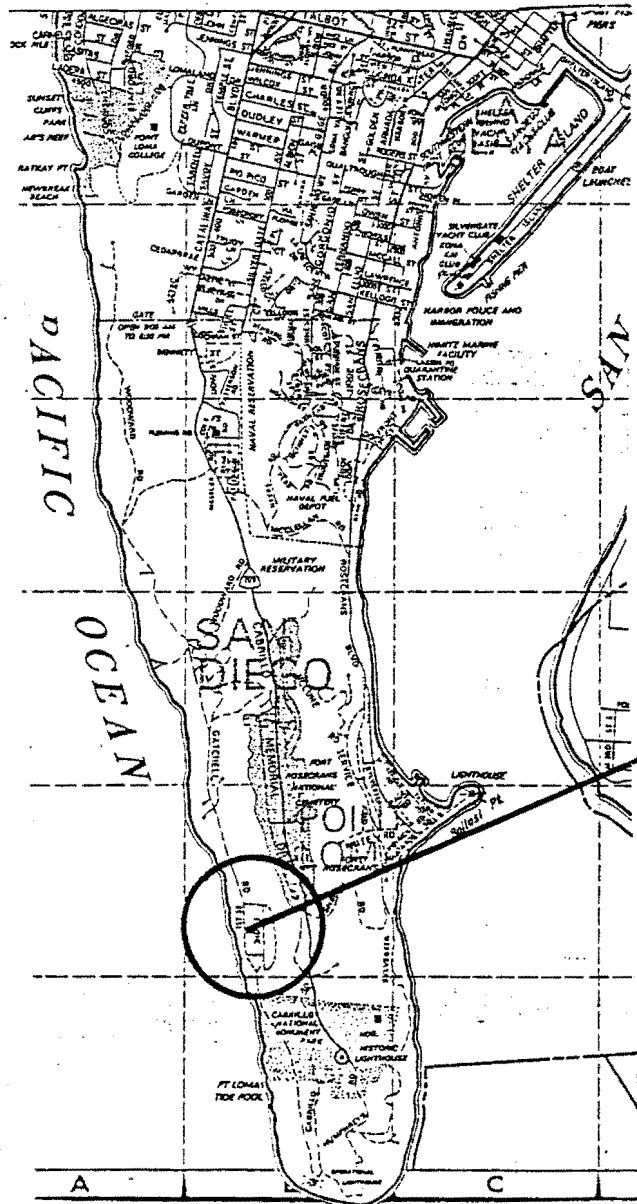


N.M. 129
A.M. 361 - PUEBLO LANDS

PACIFIC OCEAN

CITY OF SAN DIEGO
SEWAGE TREATMENT
PLANT
532.1520-006

SITE

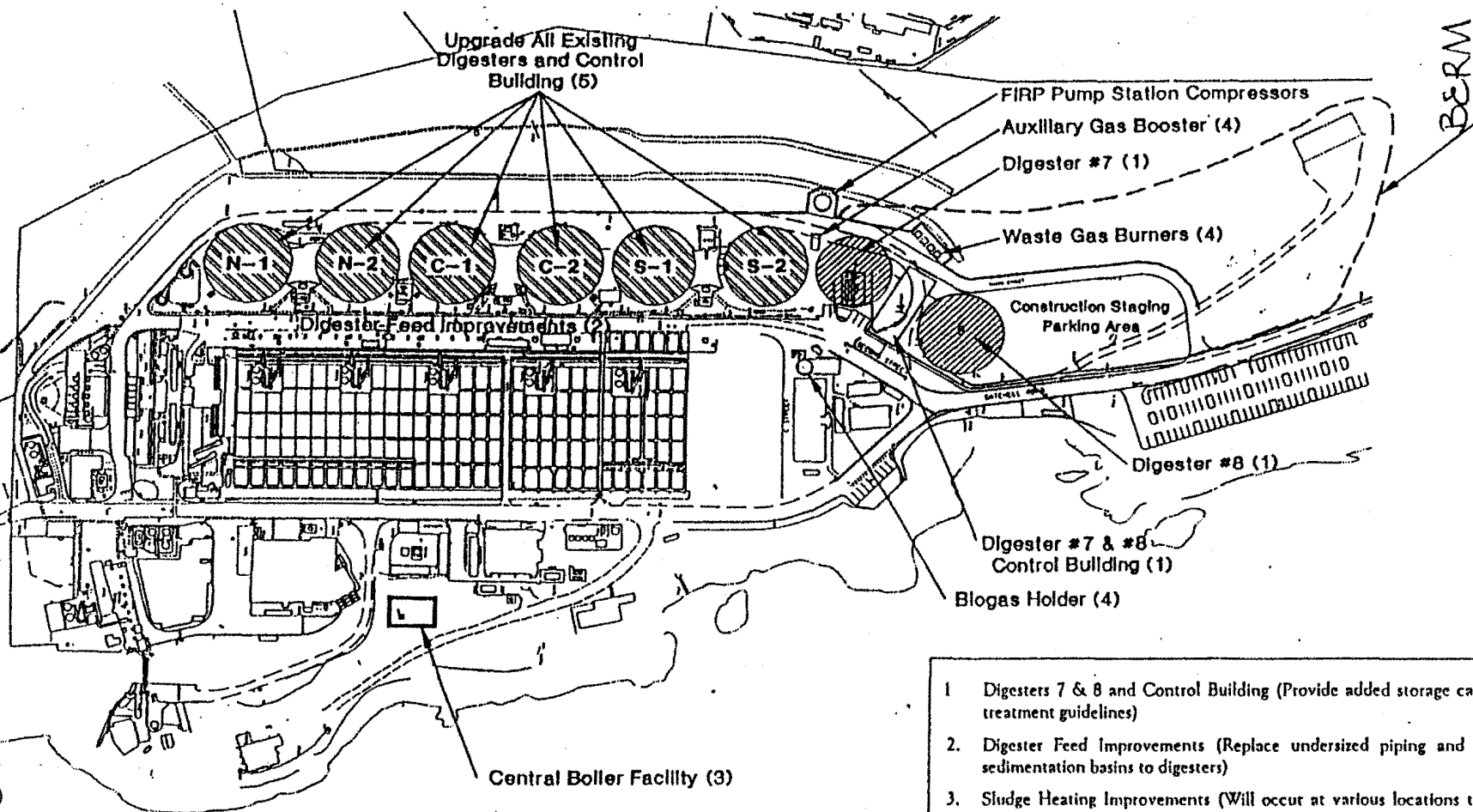


PACIFIC OCEAN

EXHIBIT NO. 1
APPLICATION NO.
6-97-124
Location Maps
California Coastal Commission

POINT LOMA WASTEWATER TREATMENT PLANT DIGESTERS 7 AND 8 AND ASSOCIATED FACILITIES

EXHIBIT NO. 2
APPLICATION NO.
6-97-124
Site Plan
California Coastal Commission



1. Digesters 7 & 8 and Control Building (Provide added storage capacity to meet federal sludge treatment guidelines)
2. Digester Feed Improvements (Replace undersized piping and automate feed system from sedimentation basins to digesters)
3. Sludge Heating Improvements (Will occur at various locations throughout the site including replacement of boilers in existing digester control buildings and replacement of older inefficient hot water piping)
4. Gas Management System Improvements (Replace older, understized, inefficient gas piping located throughout site and install new biogas holder, auxillary gas booster, and waste gas burners)
5. Digester Cover Modifications (Replace existing deteriorated covers with new steel covers)
6. Site Grading/Berm Construction (Grade digester sites and staging area, and use excavated materials to form a berm.)

Project Site Plan

