Draft
Addendum to the
Final Program Environmental Impact Report
for Biosolids Master Plan
for Project No. P2-128

SCH #: 2017071026

November 2022

Prepared for
Orange County Sanitation District
10844 Ellis Avenue
Fountain Valley, CA 92708

ENVIRONMENTAL CHECKLIST

Addendum

1. **Project Title:** P2-128: Temperature Phased Anaerobic Digestion (TPAD) Digester Facility at Plant No. 2 and P2-128A: South Perimeter Wall and Soil Improvements at Plant No. 2

2. **Lead Agency Name and Address:** Orange County Sanitation District
10844 Ellis Avenue
Fountain Valley, CA 92708

3. **Contact Person and Phone Number:** Nasrin Nasrollahi, 714.593.7330

4. **Project Location:** Orange County Sanitation District
Treatment Plant No. 2
22212 Brookhurst Street
Huntington Beach, CA 92646

5. **Project Sponsor's Name and Address:** Orange County Sanitation District,
10844 Ellis Avenue
Fountain Valley, CA 92708

6. **General Plan Designation(s):** Public (P)

7. **Zoning:** Industrial Limited (IL) and
Residential Agriculture with an Oil Overlay (RA-O)

8. **Description of Project:** (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)

The Project Description is set forth in full below.

9. **Surrounding Land Uses and Setting.** (Briefly describe the project's surroundings.)

The Santa Ana River (SAR) and SAR Trail are located immediately east of the facility. Residential neighborhoods are located north and west of Plant No. 2. The Talbert Marsh, Talbert Channel, Pacific Coast Highway (PCH), and the Pacific Ocean are located south of Plant No. 2.

10. **Other public agencies whose approval is required** (e.g., permits, financing approval, or participation agreement.)

The proposed Project modifications may require approvals from the following agencies:

- South Coast Air Quality Management District (SCAQMD), permit for construction of the Digester Feed Facility (DFF) Odor Control Facility, Thermophilic Digesters, Batch Tanks, Cooling Tower Facility, and Boiler Facility.

- City of Huntington Beach Conditional Use Permit (CUP) and Coastal Development Permit (CDP), Building Permit, and Encroachment Permit

- Regional Water Quality Control Board, Storm Water Pollution Prevention Plan (SWPPP) and General Construction Permit

- Orange County Public Works/Orange County Flood Control District Easement and Encroachment Permit

1.0 Introduction

1.1 Purpose of the Addendum

The Orange County Sanitation District (OC San) is proposing to implement Project No. P2-128 TPAD Digester Facility, which is the combination of two projects identified in OC San's 2017 Biosolids Master Plan (BMP 2017): P2-504/P2-504A/P2-504B Temperature Phased Anaerobic Digestion (TPAD) Digester Facility at Plant No. 2 and P2-501 Perimeter Screening, which are both located at Plant No. 2 in Huntington Beach (**Figure 1**). OC San certified a Final Programmatic Environmental Impact Report (PEIR) in 2018 as lead agency pursuant to the California Environmental Quality Act (CEQA) for the BMP 2017 that identified both projects as part of the overall BMP 2017. Since the certification of the BMP 2017, modifications have been proposed. The purpose of this document is to describe and evaluate the potential environmental effects associated with the proposed modifications to the TPAD Digester Facility and Perimeter Screening Project (Public Resources Code § 21166; CEQA Guidelines § 15162; CEQA Guidelines § 15168(c)(2).

1.2 Regulatory Background

Per CEQA Guidelines Section 15168(c)(2), if the agency finds that pursuant to section 15162, no subsequent EIR would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required.

Per CEQA Guidelines Section 15162, a subsequent EIR must be prepared if:

- 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;
- 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
- 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:
    - The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
    - Significant effects previously examined will be substantially more severe than shown in the previous EIR;
    - 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

- 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.

Section 15164(a) of the CEQA Guidelines provides that an addendum to a previously certified EIR is permissible 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. As described in detail below, the proposed project modifications would not result in any of the conditions listed in CEQA Guidelines Section 15162. As a result, this Addendum has been prepared.

This Addendum relies on the significance criteria established in the CEQA Guidelines and the resource analysis methodology, described in the EIR, to assess the potential impacts related to the proposed project modifications. Each resource section presents a summary and a determination as to whether the proposed project modifications would result in new significant impacts, or a substantial increase in the severity of previously identified significant impacts.

In compliance with CEQA Guidelines Section 15150, this Addendum has incorporated by reference the Draft and Final PEIR for the BMP 2017, certified by OC San in 2018, which includes all technical studies, analyses, and technical reports that were prepared as part of the Draft and Final PEIR.

2.0 Program Objectives

The primary objectives of the BMP 2017 are to:

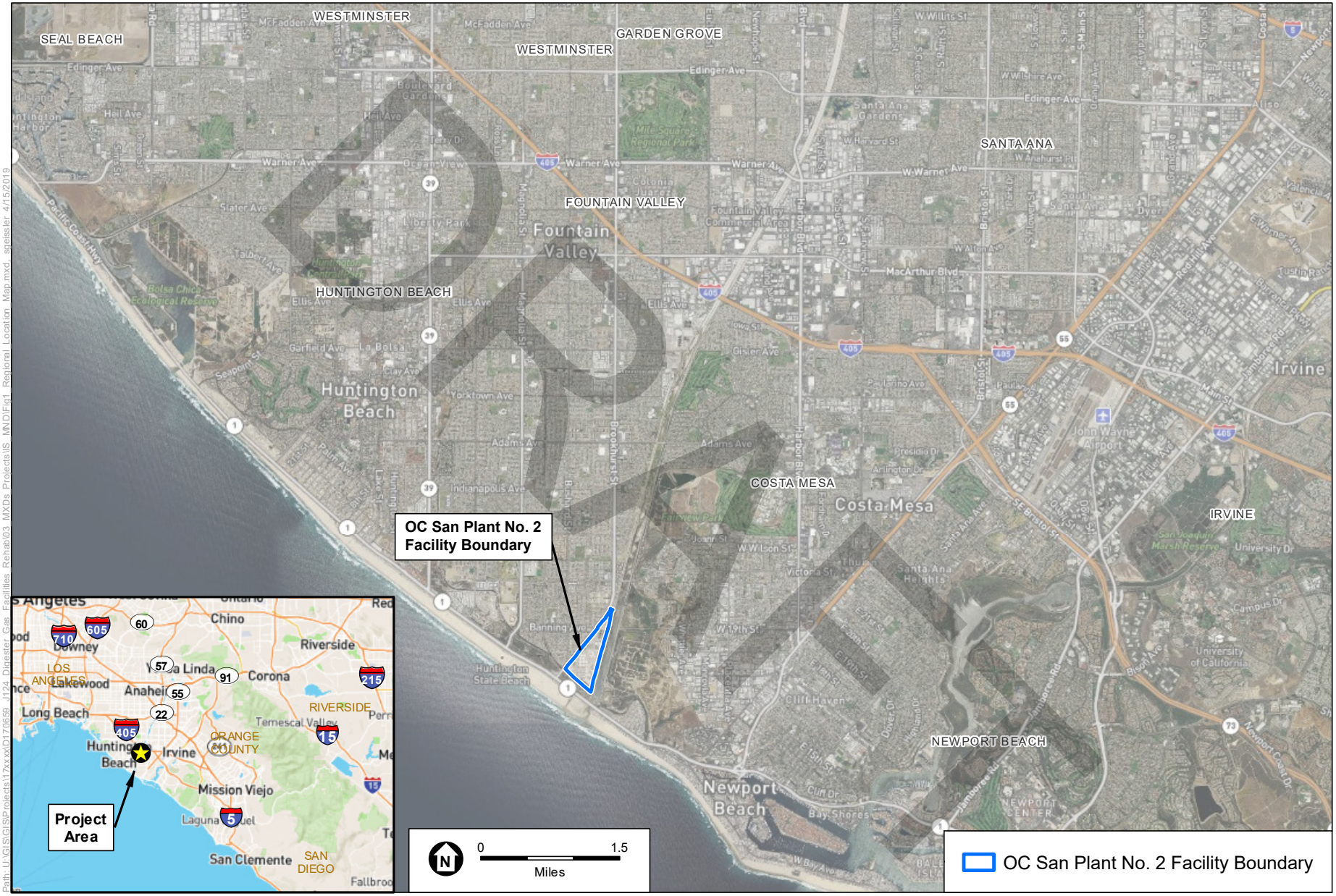
- Replace aging facilities and mitigate the structural and seismic risks for onsite biosolids structures;
- Phase-out the diversion of biosolids organics as an alternative daily cover for landfills;
- Transition from Class B to Class A biosolids quality at Plant No. 2 to increase biosolids management diversity for end users of biosolids; and
- Receive pre-processed food waste (source separated organics [SSO]) for co-digestion to assist in diverting organics from landfills and to increase digester gas production used as a renewable energy.

3.0 Project Overview

Project P2-128 combines several projects that were identified in the BMP 2017 and incorporated into OC San's Capital Improvement Program (CIP) through the 2017 Facilities Master Plan (FMP 2017). **Table 1** summarizes the project numbers used for the BMP 2017 and the FMP 2017/CIP. In this document, the Project is referred to as P2-128 and includes two main components: the TPAD Digester Facility and the South Perimeter Wall and Soil Improvements.

TABLE 1
P2-128 PRIOR PROJECT NUMBERS

P2-128 Project Component	BMP 2017 Project Numbers	FMP 2017/CIP Project Numbers
P2-128 TPAD Digester Facility at Plant No. 2	P2-504, P2-504A, P2-504B TPAD Digester Facility	P2-128 TPAD Digester Facility
P2-128A South Perimeter Wall and Soil Improvements at Plant No. 2	P2-501 Perimeter Screening	P2-125 Southwest Perimeter Screening



SOURCE: Open Street Map, MapBox, 2019.

OC San TPAD Digester Facility Project (P2-128) Addendum

Figure 1

Regional Location Map

ESA

TPAD Digester Facility

The description below is from the BMP 2017 for the TPAD Digester Facility project (Project No. P2-128 or P2-504/P2-504A/P2-504B).

> P2-504 would construct six 110-foot diameter, 40-feet tall (above ground) digesters designed to operate in either mesophilic or thermophilic operation, and TPAD sludge cooling facilities which include a pump station, ultrafiltration/nanofiltration facilities, sludge cooling heat exchangers, and a power building. All new digesters would share a common Digester Control Building that would house various pumps, pipelines, grinders, heat exchangers, electrical, HVAC (heating, ventilation, and air conditioning), and other ancillary facilities. A new Power Building will furnish electrical power for the new facilities. Six 400,000-gallon, 33.5-feet above surrounding grade Class A batch tanks would be constructed to produce Class A biosolids per EPA 503 regulations through batch holding over a specified time and temperature. The Class A batch tanks would require other ancillary equipment such as pumps, heat exchangers and grinders. The proposed new 33-foot diameter, 30-foot high (above ground) Digester Feed Facility (DFF) would replace the existing Sludge Blending Facility (SBF) where primary sludge and scum is blended and fed to the digesters. The DFF would include thickened sludge tanks, grinders, pumps, and odor control facilities using carbon towers and bioscrubbers (PEIR, p. 2-13).
>
> This project includes the demolition of the existing abandoned solids storage truck loading facility and surface asphalt areas. The total demolition would be approximately 113,000 cubic yards. This project also includes the excavation of soil for the proposed TPAD facilities to establish foundations and includes the construction of digester tanks, power building, electrical control rooms, batch tanks, digester feed facility, water cooling pump station and water softeners. The demolition and construction equipment needed for the project includes scrapers, backhoes, loaders, dozers, dump trucks and crane. The paving equipment needed for this project includes a grader, loader, and paver. Approximately 7 to 120 workers would be required at a time during various stages of construction. A minor amount of the excavated soils would be reused onsite as backfill, and there will be approximately 121,000 cubic yards that will be exported and 8,000 cubic yards that will be imported (PEIR, p. 2-26).

TPAD Perimeter Wall

The description below is from the BMP 2017 for the Perimeter Screening project (Project No. P2-125/P2-501).

> P2-501 would improve the perimeter walls of Plant No. 2. Currently, there are two concrete masonry unit (CMU) block retaining walls and vegetated berms; one wall approximately 15 feet high located along Talbert Marsh at Plant No.2 and another wall approximately 5 to 6 feet high with vegetation located along

Brookhurst Street. P2-501 would improve or replace the perimeter screening to provide a visual buffer for all proposed facilities and associated construction activities along Brookhurst Street and Talbert Marsh. The perimeter screening would be extended up to approximately 4,325 feet in length along Brookhurst Street and up to approximately 1,030 feet along Talbert Marsh. Further, the perimeter screening (vegetation) would be increased in height by approximately 10 to 15 feet along Talbert Marsh and remain approximately the same density of trees. No increase in vegetation height along Brookhurst Street is proposed, but the density of the trees will increase to impede east directional views from viewpoints west of Plant No. 2. In addition, the screening is planned to replace the existing 5- to 6-foot high wall with an 8-foot high wall along the entire length of Plant No. 2 along Brookhurst Street to improve security. Other security improvements may also include lighting directed into Plant No. 2 and security cameras (PEIR, p. 2-14).

This project includes the demolition of the existing perimeter wall (approximately 160 cubic yards), the excavation of soil for footings, the construction of a new perimeter wall and additional landscaping including trees. The type of wall and landscaping have not been determined at this time; however, the wall would extend approximately 8 feet above ground along the entire length of Plant No. 2 along Brookhurst Street. The demolition and construction equipment needed for wall installation generally includes backhoes, bulldozers and dump trucks. Approximately 10 to 20 workers would be required during various phases of wall construction and landscaping. Excavated soils would be reused onsite as backfill (PEIR, p. 2-25).

4.0 Description of the Modifications

Following the certification of the Final PEIR and approval of the 2017 BMP by OC San, detailed designs have been initiated for the implementation of a capital improvement project that would enable OC San to produce Class A Biosolids and diversify its biosolids program. The Area proposed for the modifications is illustrated on **Figure 2** and the revised project description for each proposed modification is described below. See **Table 2** for a comparison of the PEIR description and the modification analyzed in this Addendum.

TABLE 2

PEIR PROJECT ELEMENTS COMPARED TO P2-128 MODIFICATIONS

PEIR Project No. and Name	Project Element	Description in the PEIR[a]	P2-128 Addendum Modifications[a]
P2-501 – Plant No. 2 Southwest Perimeter	Wall along Talbert Marsh	1,030 feet long screening improvements or replacement (extended from Brookhurst St wall)	1,070 feet long, 8-foot (minimum) high concrete wall with subsurface foundation and soil improvements (e.g., cement deep soil mixing)

TABLE 2

PEIR PROJECT ELEMENTS COMPARED TO P2-128 MODIFICATIONS

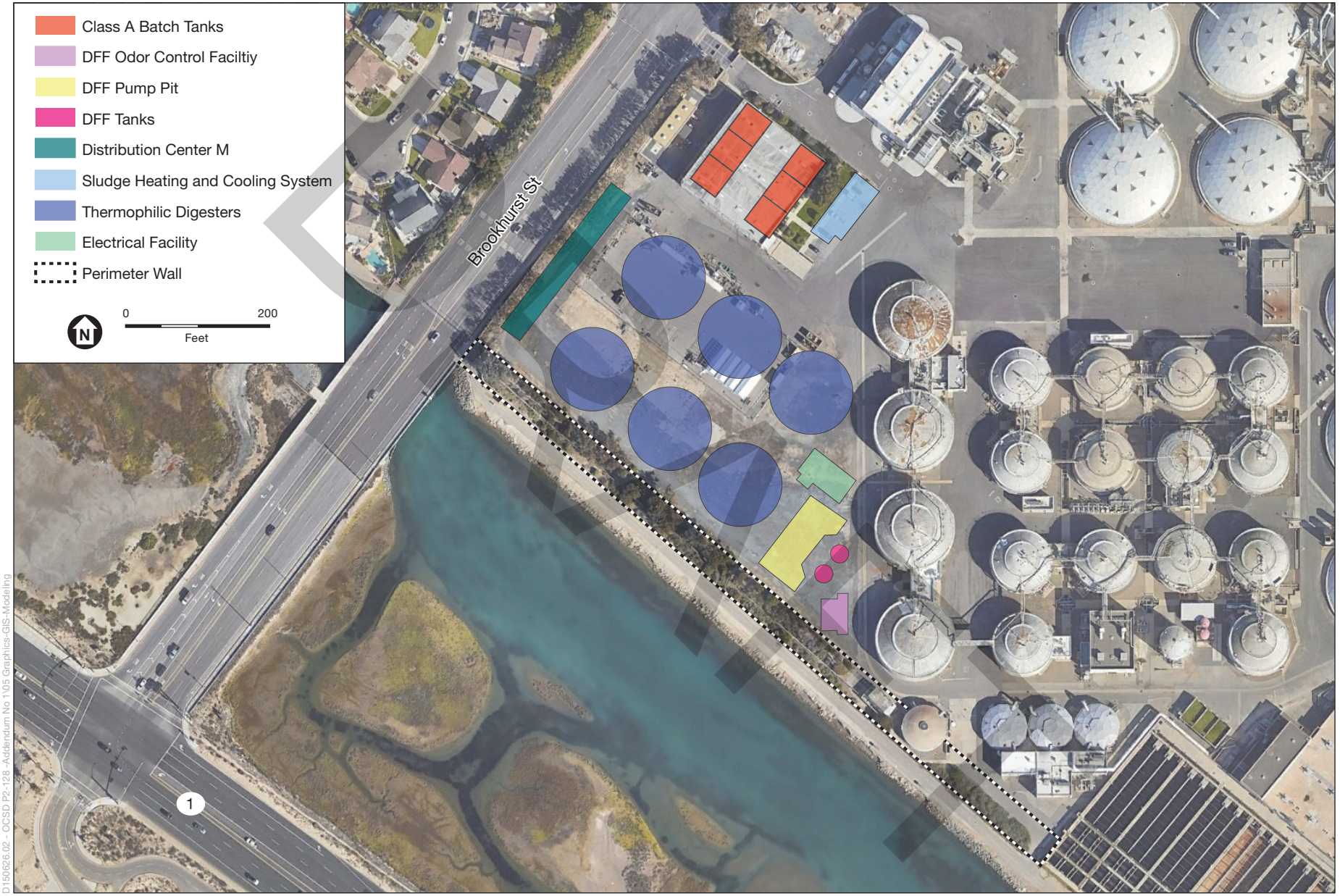
PEIR Project No. and Name	Project Element	Description in the PEIR[a]	P2-128 Addendum Modifications[a]
Screening	Wall along Brookhurst St	4,325 feet long, 8-foot high	To be processed in the future under a different project
	Vegetation along Talbert Marsh	Exterior: N/A Interior: increase in height by approximately 10 to 15 feet along and remain approximately the same density of trees	Exterior: ground cover vegetation and/or vines Interior: trees within a raised planter behind the first 100 linear feet of the new perimeter wall (near the corner of Brookhurst St and the Talbert Marsh Levee Access Road)
	Vegetation along Brookhurst St	Exterior: N/A Interior: no increase in height, but the density of the trees will increase	Exterior: ground cover vegetation and/or vines Interior: replace existing trees with box trees (to be planted in situ in the future after the construction of the new wall along Brookhurst St)
	Talbert Marsh Levee Road Improvements	N/A	Minor realignment of approximately 600 linear feet of the road/bike path to introduce a horizontal curve, allowing for a widened landscaping zone in front of the perimeter wall in this area
	Security Improvements	Lighting directed into Plant No. 2 and security cameras	Lighting directed into Plant No. 2, security cameras, and motion sensors
P2-504 – TPAD Digester Facility at Plant No. 2	Digesters	Six thermophilic digesters, 110-foot diameter, 40 feet tall	Five thermophilic digesters, 110-foot inner diameter, 40 feet tall, with accommodations to allow future addition of a 6th digester
	Digester Control Building	22,400 square foot building with first floor and basement equipment gallery	23,300 square foot below-grade gallery between the digesters with additional equipment at-grade
	Sludge Heating	Sludge heating facilities including additional boilers and hydronic loop modifications	Sludge heating facilities including 3 boilers and a connection to the CenGen hot water loop (to be replaced with a 4th boiler in the future) in a 4,200 square foot building, 30.5 feet tall (single story)
	Sludge Cooling	Sludge cooling facilities including a cooling water pump station, ultrafiltration/nanofiltration facility, and sludge cooling heat exchangers	Sludge cooling facilities including cooling tower facility and sludge cooling heat exchangers (exposed, no at-grade building)
	Power Building	3,150 square foot building, 21 feet tall	8,250 square foot building, 25 feet tall, with a partial basement
	Tunnels	2 new tunnels	2 new tunnels

TABLE 2

PEIR PROJECT ELEMENTS COMPARED TO P2-128 MODIFICATIONS

PEIR Project No. and Name	Project Element	Description in the PEIR[a]	P2-128 Addendum Modifications[a]
P2-504A – Class A Batch Tanks	Batch Tanks	Six 400,000-gallon tanks, 38 feet tall	Six 400,000-gallon tanks, 34 feet tall
	Batch Tank Ancillary Equipment	Pumps, heat exchangers, and grinders in an equipment control room adjacent to the six new tanks	Pumps, heat exchangers, and grinders located in a below-grade gallery between the batch tanks with additional equipment at-grade (exposed, no at-grade building)
P2-504B – Digester Feed Facility (DFF)	DFF Tanks	Two octagonal 100,000-gallon DFF blend tanks of concrete construction, 30 feet wide and 33 feet tall	Two cylindrical 70,000-gallon DFF blend tanks of concrete construction, 22-foot diameter and 27 feet tall, and a 17,000-gallon mixing chamber between the tanks
	DFF Ancillary Facilities	3,850 square foot building, 25 feet tall, containing tank mixing system, grinders, pumps, and electrical control room	2,900 square foot electrical building, 22 feet tall, with a basement level 7,000 square foot DFF Pump Pit containing tank mixing system, grinders, and pumps
	DFF Odor Control Facility	2,500 square foot concrete pad for carbon towers and bioscrubbers, 30 feet tall	1,000 square foot concrete pad for low-profile three-stage chemical scrubbers, 20 feet tall 700 square foot at-grade odor control chemical feed and storage facilities

a. Dimensions and volumes listed are approximate. Facility heights shown under the P2-128 Addendum Modifications are referenced to the curb elevation in front of Plant No. 2 at Brookhurst St (El. 10.5 ft NAVD88); heights listed in the 2017 BMP are assumed to be based on the same reference elevation.



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SOURCE: ESA, 2022; Google Earth, 2022

OC San TPAD Digester Facility Project (P2-128) Addendum

Figure 2
Site Plan

ESA

4.1 TPAD Digester Facility Project Modifications

The TPAD Facility Project Modifications have been developed subsequent to the certification of the PEIR for the following key components:

- Digester Feed Facility (DFF) and DFF odor control facility,
- Thermophilic digesters,
- Power Distribution Center M (DC-M)
- Class A batch tanks, and
- Sludge heating system and sludge cooling system

Each of these components or equivalent treatment process facility was included in the project analyzed in the PEIR. However, since certification of the PEIR, subsequent designs have been developed for these facilities that comprise the Project Modifications evaluated in this Addendum. Overall, the TPAD facilities would be constructed within the same area of Treatment Plant No. 2 as identified in the PEIR. However, Figure 2 identifies the precise locations of each of the components as determined during subsequent design efforts. The following sections describe the proposed Project Modifications.

Digester Feed Facility and Digester Feed Facility Odor Control Facility

The project evaluated in the PEIR included two proposed DFF tanks that would be 33 feet wide and 30 feet tall, with a volume of 100,000 gallons each, along with a building housing the tank mixing system, digester feed pumps, and electrical control room. The Project Modifications now call for two DFF tanks, approximately 22 feet in diameter and 27 feet tall, with a volume of approximately 70,000 gallons each, along with a central mixing chamber. The DFF would be located adjacent to the thermophilic digesters. The pair of DFF tanks would include cone bottoms extending below grade. The subsequent Project designs also include a new digester electrical building to power the new DFF (including the associated odor control and chemical area) and Thermophilic Digesters C, D, and F (with space for future addition of electrical equipment for Thermophilic Digester E). The Digester Feed and CDF Electrical Building would be located on the east side of the thermophilic digesters (see Figure 2).

Similar to the project evaluated in the PEIR, the P2-128 DFF odor control facility would treat foul air from the headspace of the new DFF tanks. The DFF tanks, mixing chamber, and depressed pump pit would be constructed of cast-in-place concrete. Finally, a new chemical feed and storage area would be constructed for the DFF odor control facility at the locations identified in Figure 2, east of the DFF.

In summary, the Project Modification evaluated in this Addendum for this component includes one additional DFF mixing chamber, a modified electrical building, and a new chemical feed and storage area. Each of these new facilities would be located within the same footprint identified in the PEIR for the project as shown in Figure 2.

Thermophilic Digesters

The project evaluated in the PEIR included six thermophilic digesters, with a below-grade gallery between the digesters (**Figure 3**), that would be located west of the DFF and the DFF Odor Control Facility. Subsequent designs have recommended reducing from six to five thermophilic digesters (named Thermophilic Digesters A, B, C, D, and F). The subsequent design would accommodate future construction of the 6th digester (Thermophilic Digester E), but this digester would not be constructed at this time. The thermophilic digesters would be partially buried and would be constructed of cast-in-place concrete, including the foundation, floor, wall, and roof. The PEIR evaluated digesters that would be 110 feet in diameter and 40 feet tall. In the subsequent designs, each digester would be 110 feet in inner diameter and 40 feet tall (**Figure 4**).

In summary, the Project Modification evaluated in this Addendum for this component includes the reduction from six to five thermophilic digesters of similar size. The facilities would be located within the same footprint identified in the PEIR for the project as shown in Figure 2.

Power Distribution Center M

The PEIR identified the need for a new power building, but provided little detail. The subsequent designs now call for a new Distribution Center M (DC-M) for P2-128 and the other biosolids projects identified in BMP 2017. DC-M would be built west of the digesters parallel to Brookhurst Street. This would allow distribution of 12 kilovolt (kV) power, stepped down to 480-volt (V) service. DC-M would have a footprint of approximately 250 feet by 33 feet and would be 22.5 feet tall.

During construction of this newly proposed DC-M, the existing eucalyptus trees along Brookhurst Street would be preserved if feasible. However, it is possible that the excavation for the underground utilities and building foundation could impact the root system of the existing eucalyptus trees. If it is determined that the construction activities are impacting the health of the trees, the impacted eucalyptus trees would be removed to avoid future hazards of dead tree branches or entire trees falling into the Plant or on the sidewalk along Brookhurst Street. If the trees are removed, they would be replaced with containerized trees with crowns reaching 10 to 15 feet tall.

In summary, the Project Modification evaluated in this Addendum for this component includes a new power Distribution Center to be located within the same footprint identified in the PEIR for the project as shown in Figure 2.

Class A Batch Tanks

The Project described in the PEIR called for six Class A batch tanks, each to be 400,000 gallons and to be 33.5 feet above the surrounding grade. The Project Modification calls for six Class A batch tanks constructed to the north of the new digesters and east of the existing digesters (see Figure 2). Each tank would be approximately 37 feet wide, 41 feet long, and approximately 34 feet above surrounding grade with a volume of 405,000 gallons. The new Class A batch tanks and

adjacent gallery would be completely constructed of cast-in-place reinforced concrete, with a cast-in-place concrete roof and no internal column supports.

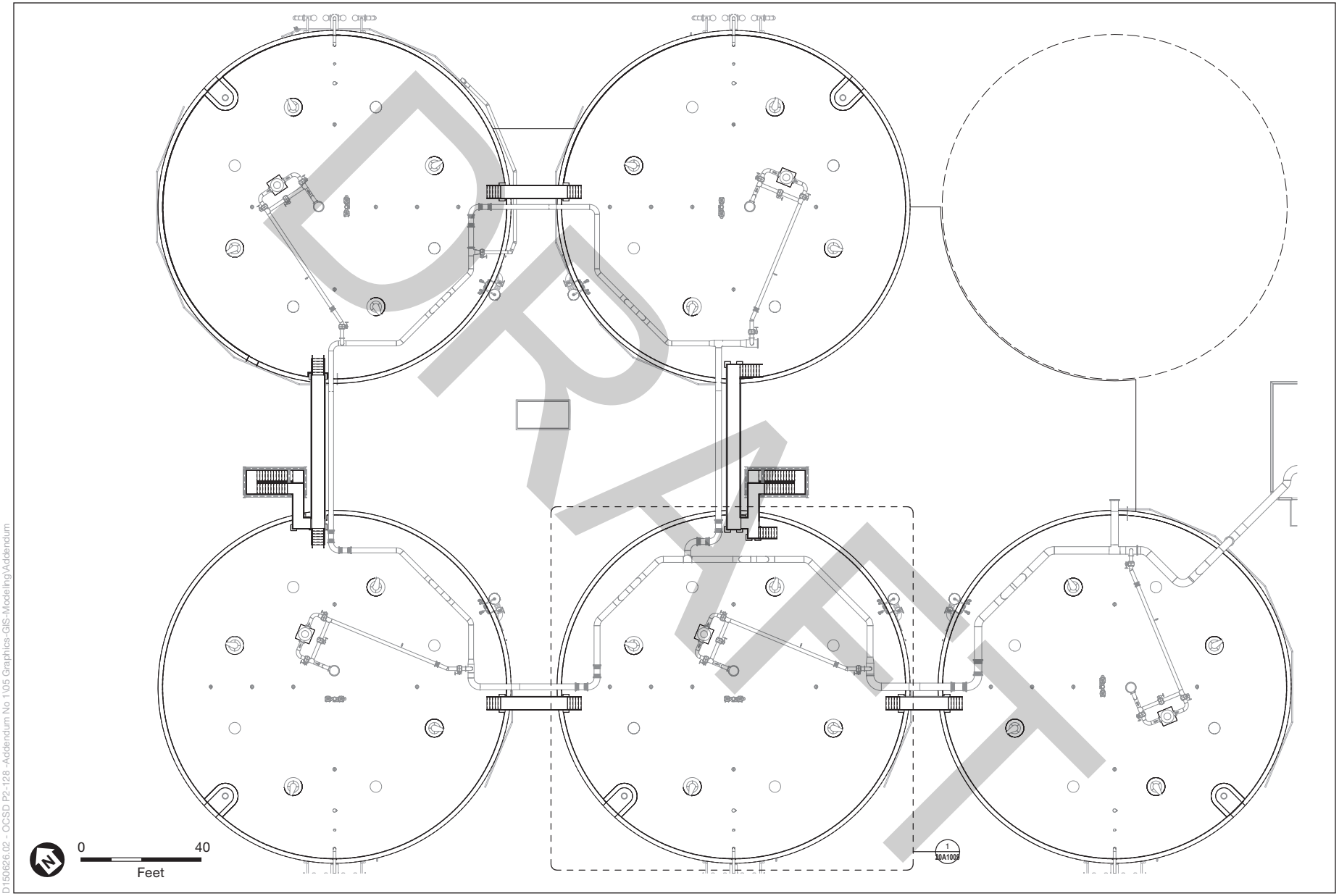
In summary, the Project Modification evaluated in this Addendum for this component includes a similar facility that is slightly larger and taller, located within the same footprint identified in the PEIR for the project as shown in Figure 2.

Sludge Heating System and Sludge Cooling System

The Project described in the PEIR called for a sludge cooling system comprised of a pump station for secondary effluent cooling water treated with ultrafiltration/nanofiltration facilities prior to use in heat exchangers to cool the thermophilic sludge. The modified project replaces this technology with a cooling tower facility. As described in the PEIR, the new thermophilic digesters and batch tanks would operate at higher temperatures than the existing digesters. The heat produced from CenGen, the current heating facility, and the existing plant boilers would not be sufficient to provide the required heating for the new process and therefore additional heating capacity would be required. Since the certification of the PEIR, which included additional boilers and hydronic loop modifications, subsequent designs have been refined to identify new boilers and a connection to the CenGen hot water loop to maintain the thermophilic digesters and batch tanks at 135°F. These new designs call for a new Boiler Facility building to be constructed north of the proposed DFF, near the new batch tanks (see Figure 2). The Boiler Facility would be constructed with cast-in-place concrete walls and would be approximately 102 feet by 43 feet (excluding the exterior stairs on the east side of the building) and 29 feet tall. The facility would be above surrounding grade with adequate space for the routing of mechanical piping and would feature four rollup doors, one for each boiler (including one future boiler). Each rollup door would be approximately 12 feet to 14 feet wide and 16 feet tall. The Boiler Facility would be sized to accommodate four boilers; however, three new hot water boilers would initially be constructed as well as heat exchangers to capture heat from OC San's existing CenGen system. The Boiler Facility has an adjacent, exterior chemical storage area, which would serve both the Boiler Facility and Cooling Tower Facility, on the south end of the building that is approximately 30 feet by 10 feet.

To cool the sludge, a cooling system would be provided that consists of sludge cooling heat exchangers (HEXs), a cooling water loop, and a method to reject heat from the system. The sludge cooling heat exchangers would transfer heat from the thermophilic sludge to the cooling water loop thereby raising the return temperature in the cooling water. This cooling system has been developed since the certification of the PEIR and would replace the technology and approach descried in the PEIR. Two cooling towers would be provided to generate cool water to meet the cooling demands. The cooling system would consist of two separate facilities: (1) the cooling towers and primary cooling water pumps, and (2) the sludge cooling HEXs located between the batch tanks. The cooling tower facility would consist of a reinforced concrete slab to accommodate the cooling towers. The cooling water recirculation pumps would be located in the tunnel system adjacent to the Batch Tanks. The two cooling towers would have a footprint of approximately 43 feet by 32 feet and would be approximately 30 feet tall.

In summary, the Project Modification evaluated in this Addendum for this component includes a new boiler facility and cooling towers replacing a proposed filtration facility to be located within the same footprint identified in the PEIR for the project as shown in Figure 2.



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SOURCE: Orange County Sanitation District, 2022

OC San TPAD Digester Facility Project (P2-128) Addendum

Figure 3
Digester Plan View

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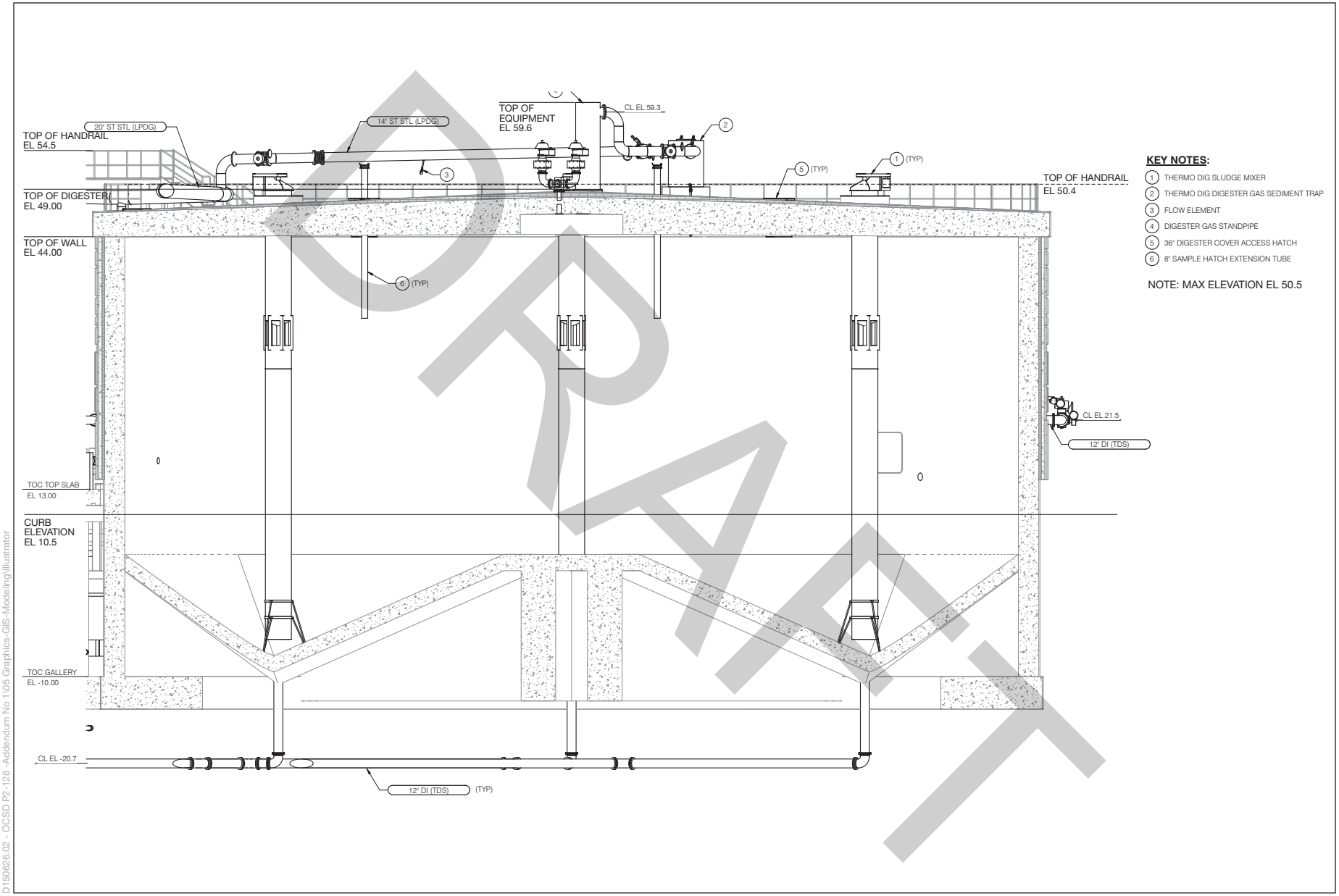


SOURCE: Brown and Caldwell, 2022

OC San TPAD Digester Facility Project (P2-128) Addendum

Figure 4
Thermophilic Digesters Sections

4.1.1 Construction

Construction methods employed for the new TPAD facilities would be similar to the assumptions included in the PEIR including the excavation of soil to establish foundations and the construction of digester tanks, power building, electrical control rooms, batch tanks, DFF, and cooling towers. The demolition and construction equipment needed for the project modification includes scrapers, backhoes, loaders, dozers, dump trucks, trenchers, and cranes. The paving equipment needed for the modification includes a grader, loader, and paver.

The PEIR noted that approximately 7 to 120 workers would be needed during construction of the TPAD facility. The modified project would require approximately 40 to 80 workers at a time during various stages of construction with a peak crew size of 100 to 120 field staff. This is well within the assumptions of the PEIR. A minor amount of the excavated soils would be reused onsite as backfill, and there would be approximately 97,200 cubic yards that would be exported. The PEIR estimated up to 121,000 cubic yards of export. The project does not require importing of soils. Construction would last for approximately 89 months, which includes 32 months for commissioning and start-up.

One construction method has been added that was not evaluated in the PEIR: soil improvements including cement deep soil mixing (CDSM) utilized to support foundations. Due to the large area covered by the thermophilic digester complex, the CDSM activities are anticipated to require two concurrent crews to expedite the start of the excavation and dewatering to support the start of the structural work. Approximately 15 to 25 workers would be required at a time during various stages of CDSM activities. Four field staff per rig would be required during the drilling activities and 12 field staff would be required during mobilization/demobilization. CDSM activities would last for approximately 22 months. The concrete batch plant will require sand, gravel, and Portland cement deliveries to the site to produce the concrete. Rebar and other supplies may also be delivered to the site. The material deliveries associated with the concrete batch plant and related supplies under the project modifications is conservatively estimated to add up to an additional 600 delivery trucks, or approximately 4 to 5 trucks per day over the 125 work days, on top of those accounted for in the PEIR.

In summary, the Project Modification evaluated in this Addendum for construction methods includes the use of CDSM methods within the same footprint identified in the PEIR for the project as shown in Figure 2.

4.2 South Perimeter Wall and Soil Improvements Project Modifications

The PEIR identified the need to modify the perimeter screening wall on Brookhurst Street and along the southern border of the Plant including the maintenance or replacement of 15-foot tall screening vegetated berms. However, since the certification of the PEIR, subsequent project designs have been developed to remove the existing vegetated berms and in their place install an 8-foot tall perimeter wall along the southern boundary of the Plant. The new wall would extend 1,030 feet from the southwest corner of the existing Activated Sludge Plant Secondary Clarifiers

to Brookhurst Street. The new wall would be constructed along a similar alignment to the existing fence line, which is adjacent to the bike path that runs parallel to the Talbert Marsh (**Figure 5)**. The new wall is planned to have a "wave" top feature with the height varying between 8 and 11 feet above ground surface. There would be a chamfer where the Talbert Marsh and Brookhurst walls meet in the southwest corner of Plant No. 2, which would have a height of up to 12-feet above ground surface. The project would include planting pine trees behind the chamfer. The new wall will act in conjunction with the existing Talbert Marsh Levee to protect the Plant from a 100-year flood adjusted for the 2070 projections of sea level rise as identified in the OC San Climate Resiliency Study, Project No. SP-152 (2019). The height of the wall is not designed for flood water elevations associated with a design tsunami; however, the wall will be designed to not fail during a tsunami event.

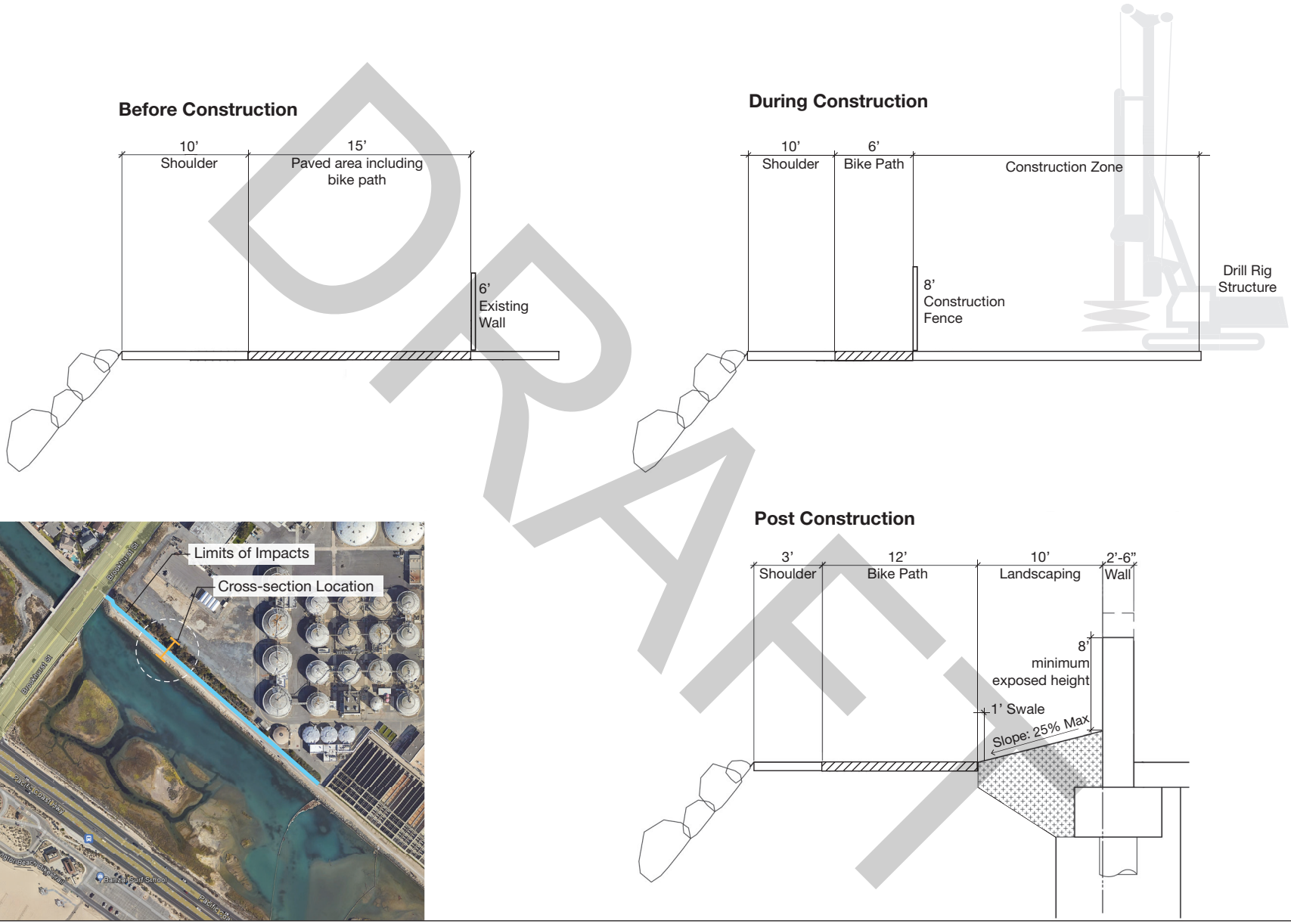
To fortify the wall, the structure would require deep soil mixing to 50 to 75-feet below ground surface and cast in drilled hole (CIDH) piles to approximately 40-feet below ground surface. Additionally, cement deep soil mixing (CDSM) would be implemented in a 45-foot-wide strip (to a depth of 35 to 75-feet below ground surface) parallel to the Talbert Marsh wall to provide lateral spread mitigation and to support the wall foundation. In locations where CDSM is not feasible due to site constraints, jet grouting or other soil improvement techniques would be used. The CDSM construction process is anticipated to utilize a temporary onsite concrete batch plant that will require sand, gravel, and Portland cement deliveries to the site to produce the concrete. Rebar and other supplies may also be delivered to the site. The material deliveries associated with the concrete batch plant and related supplies under the project modifications is conservatively estimated to add up to 600 delivery trucks, or approximately 4 to 5 trucks per day over the 125 work days, on top of those accounted for in the PEIR. Therefore, additional delivery truck emissions will occur under the project modifications beyond what was analyzed in the PEIR.

A portion of the southern perimeter wall would be constructed beyond OC San's property line, within the Orange County Flood Control District's property. OC San will coordinate with Orange County Flood Control on an easement and encroachment permit prior to constructing the wall improvements. During construction, the existing bike path will be narrowed from two 6-foot wide lanes to a single 6-foot wide lane temporarily. An 18-inch by 18-inch sign will be provided on each side of the bike path, warning that the path narrows at the Brookhurst Street bike path entrance. Temporary railing with fencing will be provided along the perimeter wall construction area. The gate and wall located near Brookhurst Street will be removed. In addition, new pavement will be laid starting from the Brookhurst Street entrance and will end near the southern edge of the wall construction area.

After the project modifications are completed, the bike path will be restored to two 6-foot wide travel lanes (Figure 5). Previous designs had included 10- to 15-foot-high vegetation along the Talbert Marsh wall; however, under the proposed modification the wall would have a combination of various shrubs and ground cover, including California Sagebrush, Coyote Brush, and California Buckwheat, running adjacent to the existing bike path. The low-lying vegetation is designed to reduce the opportunity for predatory raptors to perch near the Talbert Marsh.

During the temporary closure of the Talbert Marsh bike path, a bike path detour plan will be developed and posted at the either side of the Talbert Marsh bike path. As shown on **Figure 6**, the bike path detour would use the sidewalk along the Brookhurst Street bridge crossing the intersection of Brookhurst Street and Pacific Coast Highway and connecting to the Huntington Beach bike path. Recreational users using the Santa Ana River Trail would also be detoured south past the Talbert Marsh bike path under the Pacific Coast Highway to the Huntington Beach bike trail. The duration of the closure will be determined during construction and may last two to six weeks, which may or may not be continuous. Other shorter duration closures may also be required during construction activities.

In summary, the Project Modification evaluated in this Addendum for the perimeter screening wall component of the project includes the installation of an 8-foot-tall wall along the Plant's southern border and demolition of the existing 15-foot high vegetated berms, the need to encroach temporarily within the County-owned bike path during construction, and the use of CIDH and CDSM construction methods.



D150626.02 - OCSD P2-128 -Addendum No 1\05 Graphics-GIS-Modeling

SOURCE: ESA, 2022

OC San TPAD Digester Facility Project (P2-128) Addendum

Figure 5
Construction Stages

ESA

D150626.02 - OCSD P2-128 -Addendum No 1\05 Graphics-GIS-Modeling

SOURCE: ESA, 2022; Google Earth, 2022

OC San TPAD Digester Facility Project (P2-128) Addendum

Figure 6
Bike Path Detour

ESA

5.0 Environmental Checklist

Aesthetics

Issues (and Supporting Information Sources):		*Yes*	*No*
I.	**AESTHETICS —** Would project modifications, changed circumstances, or new information substantially increase the severity of significant impacts identified in the previous CEQA document or result in new significant impacts that could:		
a)	Have a substantial adverse effect on a scenic vista?	☐	☒
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☒
c)	In non-urbanized areas, 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?	☐	☒
d)	Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?	☐	☒

Discussion

a) Have a substantial adverse effect on a scenic vista?

TPAD Digester Facility

The PEIR evaluated impacts to scenic vistas from construction of the project within the southwest corner of Plant No. 2 in Section 3.1-1. The PEIR noted on p. 3.1-15 that the project area is located within the City of Huntington Beach's Coastal Zone and is adjacent to visual resources, facilities, and assets that contribute to the aesthetic character of the Coastal Zone. The PEIR concluded that the construction of TPAD Digester Facility would be visible but would not substantially affect the scenic resources from PCH. The PEIR stated that construction equipment including cranes, scaffolding, and other tall equipment would be temporarily visible. The proposed modifications to the TPAD facilities include the addition of process facilities within the plant site. The proposed modifications would require similar equipment during the temporary construction period, but would include CIDH methods requiring drill rigs. The appearance of the drill rigs will be similar to the cranes identified and evaluated in the PEIR. As a result, the new construction methods required by the project modifications will not alter the conclusions of the PEIR. Therefore, the modifications would not result in any new construction impacts to scenic vistas compared with the conclusions in the PEIR.

The PEIR also evaluated long-term impacts to scenic vistas from operation of the project once the new facilities are constructed. The PEIR stated that the new TPAD facilities would be 40 feet tall and visible from neighboring public views. The PEIR concluded that the construction of digesters within the southwest corner of Treatment Plant No. 2 will alter public views of the Plant site from Brookhurst Street and Pacific Coast Highway (PCH), as well as from longer distances to the northeast on the Costa Mesa bluffs, but would not block views of scenic vistas. The PEIR concluded that the new

facilities would be consistent with the other facilities on the treatment plant and would not be taller. The existing digesters are up to 40 feet in height, similar to the proposed project (PEIR p. 3.1-3). The PEIR concluded that the new digesters would result in less than significant impacts to scenic vistas since the treatment plant is already visible to these areas.

The proposed Project Modifications to the TPAD facilities would be 40 feet tall at the roof level with an additional 10 feet of appurtenant equipment. The additional roof-top equipment was not expressly identified in the PEIR. However, the Local Coastal Plan (LCP) allows for buildings up to 40 feet in height with appurtenant facilities on the roof extending an additional 10 feet requiring a conditional use permit (CUP). As a result, the Project Modifications would be consistent with the LCP with an approved CUP. Similar to the project evaluated in the PEIR, the proposed 40-foot tall digesters will be in the same location and views of the digesters will be visible from public streets such as Brookhurst Street and the PCH. As a result, the Project Modifications would be consistent with the assumptions in the PEIR and would not alter the conclusions of the PEIR.

South Perimeter Wall

The PEIR evaluated the perimeter screening on the southern border of the Plant that included revised landscaping, maintaining vegetation up to 15 feet high. The proposed Project Modifications will result in a new wall on the southern edge of the treatment plant instead of the proposed vegetated berm. Construction of the new wall will require CDSM methods requiring drilling rigs that could be up to 40 feet tall. These drill rigs were not expressly identified in the PEIR. However, the appearance of the drill rigs will be similar to the cranes identified and evaluated in the PEIR. As a result, the new construction methods required by the project modifications will not alter the conclusions of the PEIR. The temporary construction equipment required for the Project Modifications will have a less than significant impact to scenic views.

Once constructed, the new wall will be visible from public views along Brookhurst, the bike path, and PCH. The new wall will partially obscure views of the treatment plant but to a lesser extent than assumed in the PEIR. **Figure 7** shows the current condition of the Plant No. 2 site and a simulation showing the new digesters and wall. Once constructed, the new wall will be visible from both Brookhurst Street and PCH. The replacement of the existing chain link fence with a decorative wall and landscaping along the southern perimeter of the Plant will change the appearance of the southern edge of the treatment plant, but it will still partially obscure the existing industrial treatment facility. Scenic vistas will not be blocked, and the new facility will resemble the existing treatment plant infrastructure. As a result, the Project Modifications will not alter the conclusions of the PEIR and will not have a substantial adverse effect on scenic vistas.

This finding is consistent with the impact determination in the PEIR; the project modifications will not result in a new significant impact or substantially increase the

severity of a previously identified significant impact. No new mitigation measures are required.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

TPAD Digester Facility

Based on a review of the California Department of Transportation (Caltrans) List of Scenic Highways, the PEIR concluded that the project area is not located along a State Scenic Highway (Caltrans, 2022). A segment of State Route 1, PCH, is approximately 0.50-mile south of Plant No. 2 along the Pacific Ocean coastline. PCH is an Eligible Scenic Highway but is not officially designated.

The modifications proposed for the TPAD facilities include the addition of new structures within the treatment plant that will not be visible from the exterior. The height of the new digesters wound not change compared with the description in the PEIR. Construction of the TPAD facilities will be as described in the PEIR, with the addition of CDSM methods. These new construction methods would include drill rigs. Therefore, construction of the TPAD facilities will not alter the conclusions of the PEIR.

Once constructed, the TPAD facilities will be visible from portions of PCH. However, the digesters will be similar in size and mass to the project analyzed in the PEIR, and would not be within a state designated scenic highway. Since no state scenic highway occurs in the area, the proposed TPAD modifications will not alter the conclusions of the PEIR.

South Perimeter Wall

The Project Modifications include the use of CIDH construction methods requiring drill rigs. However, since the site is not near a State Designated Scenic Highway, the Project Modifications would not alter the conclusions in PEIR.

Once constructed, the modifications to the southern perimeter will alter the view by adding a new wall that will include thematic architectural treatments. Since no State Scenic Highway occurs in the area, the perimeter wall modifications will not alter the conclusions of the PEIR. This finding is consistent with the impact determination in the PEIR; no new significant impacts will occur, and no new mitigation measures are required.

Pre-Construction

Post-Construction

SOURCE: Brown and Caldwell, 2022

OC San TPAD Digester Facility Project (P2-128) Addendum

Figure 7
Pre-and Post-Construction

c) In non-urbanized areas, 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?

TPAD Digester Facility

The PEIR evaluated impacts to visual character from construction of the project within the southwest corner of Plant No. 2 in Section 3.1-3 of the PEIR. The PEIR noted on p. 3.1-15 that the project area is located within the City of Huntington Beach's Coastal Zone and is adjacent to visual resources, facilities, and assets that contribute to the aesthetic character of the Coastal Zone. The PEIR concluded that the construction of TPAD Digester Facility would be visible but would not substantially affect the scenic resources from PCH. The PEIR stated that construction equipment including cranes, scaffolding, and other tall equipment would be temporarily visible during project construction.

The proposed modifications to the TPAD facilities include the addition of process facilities within the plant site. Construction of these facilities will require the same types of equipment assumed in the PEIR analysis with the addition of CIDH methods. The appearance of the drill rigs will be similar to the cranes identified and evaluated in the PEIR, but less tall (up to approximately 40 feet). As a result, the new construction methods required by the project modifications will not alter the conclusions of the PEIR. Therefore, the modifications will not result in any new impacts to visual character compared with the conclusions in the PEIR.

The PEIR also evaluated long-term impacts to visual character once the new facilities are constructed. The PEIR stated that the new TPAD facilities would be 40 feet tall and visible from neighboring public views. The PEIR concluded that the construction of digesters within the southwest corner of Treatment Plant No. 2 will not alter the visual character of the Plant site from Brookhurst Street and Pacific Coast Highway (PCH) since the treatment plant is an existing development. The PEIR concluded that the new facilities would be consistent with the other facilities on the treatment plant and would not be taller. The PEIR concluded that the new digesters would result in less than significant impacts to visual character since the treatment plant is an existing facility.

The proposed modifications to the TPAD design include the addition of new facilities within the plant. The largest proposed structures, the digester tanks will be approximately 40 feet high with 10 feet of appurtenances for a total height of approximately 50 feet from curb elevation on Brookhurst Street. The PEIR concluded that the proposed new digesters will not be taller than existing facilities on the site, which are approximately 40 feet tall. The Proposed Modifications provide for a roof height of 40 feet consistent with the PEIR. However, appurtenant equipment on the roof will require a CUP from the City of Huntington Beach. The LCP allows for buildings up to 40 feet in height with appurtenant facilities on the roof extending an additional 10 feet requiring a CUP. As a

result, the Project Modifications would be consistent with the LCP with an approved CUP. Similar to the project evaluated in the PEIR, the proposed 40-foot tall digesters will be in the same location and views of the digesters will be visible from public streets such as Brookhurst Street and the PCH. The height of the buildings will not block views and will be consistent with the LCP. Therefore, the modifications will not alter the conclusions of the PEIR.

The new DC-M building will require excavation to underground the utilities and to construct the building foundation. This excavation would be close to the existing eucalyptus trees that currently line the western plant boundary and could impact the root system of the existing trees. The impacted eucalyptus trees may be removed to avoid future hazards of dead tree branches or entire trees falling into the Plant or on the sidewalk along Brookhurst Street. If the trees are removed, they would be replaced with containerized trees with crowns reaching 10 to 15 feet tall. Since the replacement trees would provide visual screening function, no impacts to visual character would occur.

South Perimeter Wall

The PEIR evaluated the perimeter screening that included revised landscaping. The proposed modifications would result in a new wall on the southern edge of the treatment plant. Construction of the new wall will require drilling rigs that could be up to 40 feet tall. These drill rigs were not expressly identified in the PEIR. However, the appearance of the drill rigs will be similar to the cranes identified in the PEIR. The temporary drill rigs, similar to other construction equipment, would only be onsite temporarily. As a result, the new construction methods will not alter the conclusions of the PEIR. Temporary construction equipment will have a less than significant impact to visual character.

Once constructed, the new wall will be visible from public views from the Brookhurst Street, the bike path, and PCH. Figure 7 shows the current condition of the Plant No. 2 site and a simulation showing the new digesters and wall. Once constructed, the new digesters and wall will be visible from both Brookhurst Street and PCH. The replacement of the existing chain link fence with a decorative wall and landscaping along the southern perimeter of the Plant will change the appearance of the southern edge of the treatment plant, but will not add new structures that will be inconsistent with the existing visual character. The wall will partially obscure the industrial treatment facility, similar to the existing conditions. As a result, the new perimeter wall designs will not have a substantial adverse effect on visual character.

This finding is consistent with the impact determination in the PEIR; the project modifications will not result in a new significant impact or substantially increase the severity of a previously identified significant impact. No new mitigation measures are required.

d) Create a new source of substantial light or glare which would adversely affect daytime or nighttime views in the area?

TPAD Digester Facility

The PEIR concluded in Section 3.1.3 (p. 3.1-24) that construction of the proposed project will take place during the hours of 7:00 a.m. and 8:00 p.m., Monday through Friday. No overnight construction will occur; however, construction could occur during time of darkness due to the change in season that would require temporary lighting. In addition, construction equipment would have the potential to create a temporary new lighting and source of glare to the project area; however, once the construction is completed the equipment would be removed eliminating any long term light or glare impacts. The modifications to the construction of the new TPAD facilities will not alter this assessment.

Once constructed, the PEIR noted that new lighting would be installed within the Plant to illuminate the new facilities. The proposed modifications will not alter this design feature. As required by PEIR mitigation measures AES-1 and AES-2, all lighting will be directed downwards to prevent light spillage off site. Therefore, the proposed modifications will be consistent with the analysis in the PEIR with respect light and glare. This finding is consistent with the impact determination in the PEIR; no new significant impacts will occur, and no new mitigation measures are required.

South Perimeter Wall

The PEIR described that construction activities would be conducted during daytime hours. Construction of the modified perimeter wall would adhere to this requirement. Therefore, nighttime lighting would not result in new impacts on the southern edge of the plant site.

Once constructed, no new lights would be installed on the outer wall. New lights within the treatment plant would comply with lighting design requirements, consistent with the analysis in the PEIR and mitigation measures AES-1 and AES-2. As a result, the perimeter wall modifications will be consistent with the impact determination in the PEIR; no new significant impacts will occur, and no new mitigation measures are required.

Mitigation Measures from the 2017 BMP PEIR

> **AES-1:** All new permanent exterior lighting associated with proposed program components shall be shielded and directed downward to avoid any light intrusion to surrounding uses.
>
> **AES-2:** Development of the proposed program and associated facilities shall comply with existing and future lighting ordinances for the cities of Fountain Valley and Huntington Beach.

Summary of Potential Effects on Aesthetics

The proposed modifications will not result in new significant environmental effects or result in a substantial increase in the severity of previously identified significant effects with respect to aesthetics. No further environmental review is required. (Public Resources Code § 21166; CEQA Guidelines § 15162.).

References

California Department of Transportation (Caltrans), 2022. Officially Designated Scenic Highway, Orange County. Available at: http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/, accessed August 30, 2022.

City of Huntington Beach, 2011. City of Huntington Beach General Plan, Coastal Element. Available online at: https://www.huntingtonbeachca.gov/files/users/planning/Coastal_Elem_Tech_Synop.pdf, accessed August 30, 2022.

Agriculture and Forestry Resources

Issues (and Supporting Information Sources):		*Yes*	*No*
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 forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would project modifications, changed circumstances, or new information substantially increase the severity of significant impacts identified in the previous CEQA document or result in new significant impacts that could**:**		
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?	☐	☒
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☒
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))?	☐	☒
d)	Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☒
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 conversion of forest land to non-forest use?	☐	☒

Discussion

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?

TPAD Digester Facility and South Perimeter Wall

The Initial Study prepared for the PEIR concluded that no agricultural resources exist within or surrounding Plant No. 2. The PEIR determined that the project would result in no impact to the resource and did not need to be evaluated any further in the PEIR.

The proposed modifications to the TPAD Digester Facility and perimeter wall involve facility components within the same approximate footprint assumed in the PEIR. Therefore, the proposed modifications will not alter the conclusions of the PEIR. There is no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance located adjacent to the project area (DOC 2022a). No new significant impacts will occur, and no new mitigation measures are required.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

TPAD Digester Facility and South Perimeter Wall

The Initial Study prepared for the PEIR concluded that no agricultural uses or Williamson Act parcels exist within or surrounding Plant No. 2. The PEIR determined that the project would result in no impact to the resource and did not need to be evaluated any further in the PEIR.

The proposed modifications to the TPAD Digester Facility and perimeter wall involve facility components within the same approximate footprint assumed in the PEIR. Therefore, the proposed modifications will not alter the conclusions of the PEIR. There are no agricultural lands or Williamson Act parcels near the project site. No new significant impacts will occur, and no new mitigation measures are required.

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))?

TPAD Digester Facility and South Perimeter Wall

The Initial Study prepared for the PEIR concluded that no forest or timberland resources exist within or surrounding Plant No. 2. The PEIR determined that the project would result in no impact to the resource and did not need to be evaluated any further in the PEIR.

The proposed modifications to the TPAD Digester Facility and perimeter wall involve facility components within the same approximate footprint assumed in the PEIR. Therefore, the proposed modifications will not alter the conclusions of the PEIR. No new significant impacts will occur, and no new mitigation measures are required.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

TPAD Digester Facility and South Perimeter Wall

The Initial Study prepared for the PEIR concluded that no forest or timberland resources exist within or surrounding Plant No. 2. The PEIR determined that the project would result in no impact to the resource and did not need to be evaluated any further in the PEIR.

The proposed modifications to the TPAD Digester Facility and perimeter wall involve facility components within the same approximate footprint assumed in the PEIR. Therefore, the proposed modifications will not alter the conclusions of the PEIR. No new significant impacts will occur, and no new mitigation measures are required.

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 conversion of forest land to non-forest use?

TPAD Digester Facility and South Perimeter Wall

The Initial Study prepared for the PEIR concluded that no agricultural, forest or timberland resources exist within or surrounding Plant No. 2. The PEIR determined that the project would result in no impact to the resource and did not need to be evaluated any further in the PEIR.

The proposed modifications to the TPAD Digester Facility and perimeter wall involve facility components within the same approximate footprint assumed in the PEIR. Therefore, the proposed modifications will not alter the conclusions of the PEIR. No new significant impacts will occur, and no new mitigation measures are required.

Summary of Potential Effects on Agricultural and Forestry Resources

The proposed modifications will not result in new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects, with respect to agricultural and forestry resources. No further environmental review is required. (Public Resources Code § 21166; CEQA Guidelines § 15162.).

References

California Department of Conservation (DOC), 2022a. Important Farmland Finder. Available online at: https://maps.conservation.ca.gov/DLRP/CIFF/, accessed on August 30, 2022.

California Department of Conservation (DOC), 2022b. Williamson Act Contract Land. Available online at: https://planning.lacity.org/eir/HollywoodCenter/Deir/ELDP/(E)%20Initial%20Study/Initial%20Study/Attachment%20B%20References/California%20Department%20of%20Conservation%20Williamson%20Map%202016.pdf, accessed on August 30, 2022.

City of Huntington Beach, 2017. City of Huntington Beach General Plan: General Plan Designations. Available online at: https://www.huntingtonbeachca.gov/files/users/planning/General-Plan-Map.pdf, accessed on August 30, 2022.

Air Quality

Issues (and Supporting Information Sources):		*Yes*	*No*
III.	**AIR QUALITY —** Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would project modifications, changed circumstances, or new information substantially increase the severity of significant impacts identified in the previous CEQA document or result in new significant impacts that could:		
a)	Conflict with or obstruct implementation of the applicable air quality plan?	☐	☒
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?	☐	☒
c)	Expose sensitive receptors to substantial pollutant concentrations?	☐	☒
d)	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☒

Discussion

a) Conflict with or obstruct implementation of the applicable air quality plan?

TPAD Digester Facility

The PEIR evaluated the construction emissions of each BMP project, including the TPAD facility. The combined emissions of all construction activities for the BMP projects exceeded significance thresholds for NOx. As a result, the PEIR adopted Mitigation Measure AQ-1 regarding mobile off-road construction equipment. .

The proposed TPAD facility modifications include a construction method not anticipated in the PEIR. A temporary on-site concrete batch plant will be installed to support the CDSM foundation construction methods. The batch plant will be electric-powered (e.g., mixing, conveyors, etc.), which will result in minimal and temporary electricity demand, and will not result in on-site combustion-related air pollutant emissions. Emissions from the on-site concrete batch plant will be associated with fugitive dust from the production and conveyance of concrete. The concrete batch plant under the proposed modifications would be used for approximately 12 months (approximately six months of soil improvement work for the perimeter wall area and approximately six 6 months for the soil improvement work for the TPAD area) and produce up to approximately 4,000 cubic yards.

The concrete batch plant will require sand, gravel, and Portland cement deliveries to the site to produce the concrete. Rebar and other supplies may also be delivered to the site. The PEIR accounted for 600 delivery trucks during construction. The material deliveries associated with the concrete batch plant and related supplies under the project modifications is conservatively estimated to add up to 600 delivery trucks, or

approximately 4 to 5 trucks per day over the 125 work days, on top of those accounted for in the PEIR. Therefore, additional delivery truck emissions will occur under the project modifications beyond what was analyzed in the PEIR. As discussed in Item (b) below, the additional emissions would not cause or contribute to an exceedance of the applicable SCAQMD significance thresholds.

Construction of the project modifications would require approximately 40 to 80 workers at a time during various stages of construction with a peak crew size of approximately 100 to 120 field staff. The PEIR evaluated a maximum of 120 construction workers per day for this component and analyzed a worse-case day including cumulative trips from multiple BMP projects. Therefore, the project modifications would result in the same maximum daily worker vehicle commutes as the PEIR. No additional worker vehicle commute emissions would occur as a result of the project modifications, and direct or cumulative emissions would not exceed vehicle emissions assumed in the PEIR.

Once constructed, the project modifications would generate operational emissions that will not exceed the SCAQMD significance thresholds. As discussed in Section 3.2, *Air Quality*, of the PEIR, the project will increase the energy efficiency of the facilities, and as such, will not generate a net demand for energy that cannot be supported by the existing CenGen facility at Plant No. 2. The project modifications will increase the number of boilers by one compared to the PEIR (i.e., the project modifications call for three boilers with a fourth in the future compared to the PEIR which evaluated two boilers with a third in the future). The primary fuel source for the boilers is intended to be digester gas. Natural gas would be supplemented only if sufficient digester gas is not available; however, it is not known if or when this would be needed. Only two of the new boilers would operate at a time, and would do so in a lead/lag fashion, responding to heating demands that vary throughout the day and by season. Since the primary fuel source would be digester gas, emissions of digester gas are accounted for in the PEIR.

During operations, the project modifications would add approximately 30 additional workers beyond what was assumed in the PEIR. As discussed in Item (b) below, the additional work vehicle trips would not cause or contribute to an exceedance of the applicable SCAQMD significance thresholds. The approximately 30 additional workers would also not contribute substantially to vehicle miles traveled (VMT) (refer to Section XVII, *Transportation*, Item (b), below, which determined that the project modifications would not result in substantial VMT increases). As such, the project modifications will not conflict with the VMT reduction targets and growth projections of the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Therefore, the operational activities associated with the proposed project modifications will result in a less than significant impact on the implementation of the AQMP. This finding is consistent with the impact determination in the PEIR; no new significant impacts will occur, and no new mitigation measures are required.

South Perimeter Wall

The PEIR concluded that the perimeter screening project would result in minimal emissions. The new perimeter wall foundation system will require deep soil mixing that was not anticipated in the PEIR. The new construction method will install cast in drilled hole (CIDH) piles to approximately 40-feet below ground surface. Additionally, deep soil mixing will be implemented in a 45-foot-wide strip (to a depth of 35-70 feet below ground surface) parallel to the Talbert Marsh wall to provide lateral spread mitigation and to support the wall's foundation. In locations where deep soil mixing is not constructible, jet grouting techniques may be used to accomplish the ground improvements.

The proposed modifications to the existing south perimeter screening are anticipated to require a temporary on-site concrete batch plant and up to three bore/drill rigs, which were not considered in the PEIR. Additionally, these proposed modifications will require an increase in the amount of soil export that was considered in the PEIR (e.g., due to the spoils generated from the deep soil mixing and jet grouting processes).

The temporary on-site concrete batch plant will be electric-powered (e.g., mixing, conveyors, etc.), which will result in generally minimal and temporary electricity demand, and will not result in on-site combustion-related air pollutant emissions. The concrete batch plant will require sand, gravel, and Portland cement deliveries to the site to produce the concrete. Rebar and other supplies may also be delivered to the site. The PEIR accounted for 600 delivery trucks during construction. The material deliveries associated with the concrete batch plant and related supplies under the Project Modifications is conservatively estimated to add up to 600 delivery trucks, or approximately 4 to 5 trucks per day over the 125 work days, on top of those accounted for in the PEIR. Therefore, additional delivery truck emissions will occur under the project modifications beyond what was analyzed in the PEIR. As discussed in Item (b) below, the additional emissions would not cause or contribute to an exceedance of the applicable SCAQMD significance thresholds.

The three bore/drill rigs will be diesel-powered and meet the Tier 4 final emissions standards, as per PEIR mitigation measure AQ-1. The air pollutant emissions were quantified using the California Emissions Estimator Model (CalEEMod), version 2020.4.0, using the model-provided equipment horsepower and usage factors.

The increased amount of soil export generated by the proposed project modifications will require additional haul truck trips; however, the maximum daily haul trucks will be the same as what was analyzed in the PEIR. The PEIR estimated a maximum of 72 daily haul trucks generating 72 inbound trips and 72 outbound trips per day. The project modifications will result in approximately 97,200 cubic yards of soil export and no soil import. The daily export volume for the project as modified would be up to approximately 780 cubic yards if export only occurs during the 125 concrete work days, but would be less than 780 cubic yards if export occurs over a longer period during the overall 57-month construction duration (excluding the 32-month commission and startup duration). The PEIR evaluated up to 1,075 cubic yards of combined soil export and

import. Therefore, the project modifications would result in truck hauling that would be less than the PEIR. No additional truck hauling emissions would occur as a result of the project modifications.

The estimated increase in air pollutant emissions from the on-site concrete batch plant and drill rig are provided in the next section under Item (b). As shown, the project modifications will have a minor increase in construction air pollutant emissions; however, the minor increase will not result in new impacts or a substantial increase in previously identified significant impacts. As specified in the PEIR, the project modifications will implement **Mitigation Measures AQ-1 and AQ-2** from the PEIR to reduce NO_X emissions during construction. With implementation of Mitigation Measures AQ-1 and AQ-2, construction NO_X emissions will be reduced to below the SCAQMD significance threshold and construction impacts with respect to the AQMP will be mitigated to less than significant.

Once constructed, the perimeter wall would not emit air emissions.

Mitigation Measures from the 2017 BMP PEIR

> **AQ-1:** Mobile off-road construction equipment (wheeled or tracked) used during construction of the individual projects of the proposed program shall meet the USEPA Tier 4 final standards, either as original equipment or equipment retrofitted to meet the Tier 4 final standards. A copy of each unit's certified tier specification or model year specification shall be available upon request at the time of mobilization of each applicable unit of equipment.
>
> **AQ-2:** When grading activities associated with the nine projects of the proposed program occur within 50 meters of the nearest sensitive receptors, the number of scrapers active onsite is restricted to a maximum of 5 and the number of dozers is restricted to a maximum of 2.

b) Cumulatively considerable net increase of any criteria pollutant

TPAD Digester Facility

As summarized above, the project modifications will generate additional air pollutant emissions that were not accounted for in the PEIR from the on-site concrete batch plant and the use of drill rigs. Based on the scope of the proposed project modifications, the concrete batch plant is assumed to operate for approximately twelve months and produce up to approximately 4,000 cubic yards of concrete. It is assumed that the concrete batch plant and drill rigs associated with construction of the south perimeter wall and associated deep soil mixing could overlap with other on-site construction activities.

The estimated increase in air pollutant emissions from the on-site concrete batch plant and drill rigs are provided in **Table 3**, *Mitigated Regional Construction Emissions for the Approved Project and Modified Project*. Similar to the project analyzed in the PEIR, the project modifications will implement Mitigation Measures AQ-1 and AQ-2 to reduce

emissions during construction. With implementation of Mitigation Measures AQ-1 and AQ-2, construction NO_X emissions will be reduced to below the SCAQMD significance threshold and impacts would be less than significant.

TABLE 3
MITIGATED REGIONAL CONSTRUCTION EMISSIONS FOR THE APPROVED PROJECT AND MODIFIED PROJECT

	Estimated Maximum Daily Emissions (lbs/day)					
Emission Source	**ROG**	**NO_X**	**CO**	**SO_2**	**PM10**	**PM2.5**
Certified PEIR (Approved Project)						
Onsite (PEIR Table 3.2-8)	43.99	8.98	83.21	0.17	9.47	4.97
Offsite (PEIR Table 3.2-8)	3.56	53.42	28.13	0.17	6.80	2.01
Subtotal (PEIR Table 3.2-8)	47.55	62.40	111.33	0.34	16.27	6.98
Addendum (Modified Project)						
Concrete Batch Fugitive Dust	—	—	—	—	2.38	0.36
Drill Rigs	0.36	1.53	12.87	0.03	0.007	0.007
Delivery/Vendor Trucks	0.01	0.40	0.26	<0.01	0.06	0.02
Subtotal	0.37	1.93	13.13	0.03	2.45	0.39
Total (PEIR + Addendum)	47.92	64.33	124.46	0.37	18.72	7.37
Regional Significance Threshold	75	100	550	150	150	55
Significant Impact?	No	No	No	No	No	No

SOURCE: ESA 2017 and 2022

Once constructed, the project modification's operational emissions will not exceed the SCAQMD significance thresholds. This finding is consistent with the impact determination in the PEIR; no new significant impacts will occur, and no new mitigation measures are required. The estimated increase in air pollutant emissions from operations are provided in **Table 4**, *Regional Operational Emissions for the Approved Project and Modified Project*. As shown, operational emissions would be less than significant.

TABLE 4
REGIONAL OPERATIONAL EMISSIONS FOR THE APPROVED PROJECT AND MODIFIED PROJECT

	Estimated Maximum Daily Emissions (lbs/day)					
Emission Source	**ROG**	**NO_X**	**CO**	**SO_2**	**PM10**	**PM2.5**
Certified PEIR (Approved Project)						
Subtotal (PEIR Table 3.2-7)	(<1)	11	5	(<1)	1	1
Addendum (Modified Project)						
Worker Vehicle Trips	<1	<1	2	<1	1	<1
Subtotal	3.68	53.93	32.42	0.18	10.37	2.55
Total (PEIR + Addendum)	<1	11	7	<1	2	1
Regional Significance Threshold	55	55	550	150	150	55
Significant Impact?	No	No	No	No	No	No

SOURCE: ESA 2017 and 2022

South Perimeter Wall

As summarized above, the Project Modifications will generate additional air pollutant emissions that were not accounted for in the PEIR from the on-site concrete batch plant and the use of drill rigs. The concrete batch plant is assumed to operate for approximately twelve months and produce up to approximately 4,000 cubic yards of concrete. It is assumed that the concrete batch plant and drill rigs associated with construction of the south perimeter wall and associated deep soil mixing could overlap with other on-site construction activities. The estimated increase in air pollutant emissions from the on-site concrete batch plant and drill rigs are provided in **Table 3**, *Mitigated Regional Construction Emissions for the Approved Project and Modified Project*. Similar to the project, the project modifications will implement Mitigation Measures AQ-1 and AQ-2 to reduce emissions during construction. With implementation of Mitigation Measures AQ-1 and AQ-2, construction NO_X emissions will be reduced to below the SCAQMD significance threshold and impacts would be less than significant.

Once constructed, the perimeter wall would not emit air emissions.

Mitigation Measure from the 2017 BMP PEIR

Implementation Mitigation Measures AQ-1 and AQ-2.

c) Expose sensitive receptors to substantial pollutant concentrations

TPAD Digester Facility

As discussed above, the project as modified will generate additional air pollutant emissions that were not accounted for in the PEIR from the on-site concrete batch plant and the use of drill rigs. The estimated localized air pollutant emissions from the on-site concrete batch plant and drill rigs are provided in **Table 5**, *Mitigated Localized Construction Emissions for the Modified Project*. Similar to the project evaluated in the PEIR, the project modifications will implement Mitigation Measures AQ-1 and AQ-2 from the PEIR to reduce emissions during construction. Similar to the project evaluated, with implementation of Mitigation Measures AQ-1 and AQ-2, localized construction emissions for the project modifications will not exceed the SCAQMD significance threshold and localized impacts will be mitigated to less than significant.

TABLE 5
MITIGATED LOCALIZED CONSTRUCTION EMISSIONS FOR THE APPROVED PROJECT AND MODIFIED PROJECT

	Estimated Maximum Daily On-Site Emissions (lbs/day)			
Emissions Source	**NO_X**	**CO**	**PM10**	**PM2.5**
Certified PEIR (Approved Project)				
Subtotal (PEIR Table 3.2-11)	7	69	6.64	3
Addendum (Modified Project)				
Concrete Fugitive Dust	—	—	2.38	0.36
Drill Rigs	1.53	12.87	<0.01	<0.01
Subtotal	1.53	12.87	2.39	0.37
Total (PEIR + Addendum)	8.5	81.9	9.03	3.4
Localized Significance Threshold [a]	183	1,253	13	7
Significant Impact?	No	No	No	No

[a] The Plant No. 2 program area encompasses approximately 16 acres. The LSTs are conservatively based on the screening table for the largest area, at the closest receptor distance, and the lower screening criteria of Source Receptor Area 17 and 18.

SOURCE: ESA 2017 and 2022

With respect to construction toxic air contaminant (TAC) emissions, as shown in Table 4, combustion emissions from the drill rig will result in less than 0.01 pounds per day of PM10 and PM2.5 (i.e., diesel particulate matter). The drill rig will meet the stringent Tier 4 Final emissions standards as required by Mitigation Measure AQ-1, which substantially reduces emissions of NO_X, PM10, and PM2.5. Given the negligible diesel particulate matter emissions, the proposed project modifications will not contribute to an increase in construction health risk impacts in excess of the significance threshold of a cancer risk of 10 in one million and, like the project evaluated in the PEIR, the project modifications will result in a less than significant impact with implementation of mitigation measures.

Once constructed, the project modifications' operational emissions will not be substantial, as previously discussed, and will not exceed the SCAQMD operational LSTs as has been analyzed in the PEIR. Therefore, based on the above, the proposed project modifications will not result in new significant impacts or a substantial increase in the severity of previously identified significant impacts. This finding is consistent with the impact determination in the PEIR; no new significant impacts will occur, and no new mitigation measures are required.

South Perimeter Wall

As discussed above, the project as modified will generate additional air pollutant emissions that were not accounted for in the PEIR from the on-site concrete batch plant and the use of drill rigs. The estimated localized air pollutant emissions from the on-site concrete batch plant and drill rigs are provided in Table 5, *Mitigated Localized*

Construction Emissions for the Modified Project. Similar to the project evaluated in the PEIR, the project modifications will implement Mitigation Measures AQ-1 and AQ-2 from the PEIR to reduce emissions during construction. Similar to the project evaluated in the PEIR, with implementation of Mitigation Measures AQ-1 and AQ-2, localized construction emissions for the project modifications will not exceed the SCAQMD significance threshold and localized impacts would be less than significant.

Once constructed, the perimeter wall would not emit air emissions.

Mitigation Measure from the 2017 BMP PEIR

Implementation Mitigation Measures AQ-1 and AQ-2.

d) Other emissions (such as those leading to odors) adversely affecting a substantial number of people

TPAD Digester Facility and South Perimeter Wall

Construction of the Project Modifications will not introduce any new odor sources that were not already analyzed in the PEIR. Therefore, other emissions, such as those leading to odors from construction will be less than significant and no new mitigation measures will be required.

Operation of the project as modified will include the same facilities and operational processes that were considered in the PEIR. The project modifications will refine the locations, sizing, and equipment for the DFF and the DFF odor control facility, including a design refinement that would utilize low-profile multi-stage chemical scrubbers. Therefore, with the implementation of the upgraded odor control system, potential odor impacts to sensitive receptors will be less than significant and the project modifications will not result in new significant impacts, or a substantial increase in the severity of previously identified significant impacts. This finding is consistent with the impact determination in the PEIR; no new significant impacts will occur, and no new mitigation measures are required.

Summary of Potential Effects on Air Quality

The proposed modifications will not result in new significant environmental effects or result in a substantial increase in the severity of previously identified significant effects, with respect to air quality. No further environmental review is required. (Public Resources Code § 21166; CEQA Guidelines § 15162.).

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Biological Resources

Issues (and Supporting Information Sources):		*Yes*	*No Impact*
IV.	**BIOLOGICAL RESOURCES —** Would project modifications, changed circumstances, or new information substantially increase the severity of significant impacts identified in the previous CEQA document or result in new significant impacts that could**:**		
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?	☐	☒
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?	☐	☒
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?	☐	☒
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?	☐	☒
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒
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?	☐	☒

Discussion

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?

TPAD Digester Facility

The PEIR concluded in Section 3.3.3 that with implementation of Mitigation Measure BIO-1, the TPAD facility would not significantly affect biological resources. The proposed Project Modifications to the TPAD facilities include additional equipment within the treatment plant site. Construction activities of the TPAD Digester Facility as modified will be similar to the construction analyzed in the PEIR.

As analyzed in the PEIR, in order to construct the TPAD facilities, removal of soil, pavement, and trees would be required. The removal of vegetation has the potential to disturb nesting birds if the activities occur during nesting season (February 15 to August 31 for songbirds; January 15 to August 31 for raptors). To mitigate potential impacts, the PEIR included **Mitigation Measure BIO-1**, which requires a qualified biologist to do a nesting bird survey prior to tree removal. Similar to the project evaluated in the PEIR, the proposed modifications will implement Mitigation Measure BIO-1 which would address potential impacts to nesting birds during construction.

Once constructed, the proposed Project Modifications will be located within the same approximate footprint evaluated in the PEIR The proposed TPAD modifications will not alter the conclusions of the PEIR. With implementation of BIO-1, potential impacts would be less than significant ; no new significant impacts will occur no substantial increase in a previously identified significant impact will occur, and no new mitigation measures are required.

South Perimeter Wall

The PEIR concluded that potential impacts to biological resources could occur during construction of the perimeter screening due to removal of existing vegetation, including the existing perimeter trees. As noted above, the PEIR concludes that implementation of Mitigation Measure BIO-1 would reduce the potential impacts to less than significant levels.

The proposed Project Modifications will install a new south perimeter wall that will extend the construction footprint outward to within approximately 16 feet of the Talbert Marsh. The existing fence line is approximately 25 feet from the Talbert Marsh edge. The construction activities will not directly affect the Talbert Marsh. However, construction of the south perimeter wall will involve the removal of existing ornamental screening vegetation.

A biological resource field reconnaissance conducted on July 29, 2022 found that this vegetation was predominantly non-native ornamental plants that may support nesting common birds, but does not otherwise provide natural habitat value. The survey identified five individual plants that are California Rare Plant Rank (CRSR) 4 species, the *Iva hayesiana* and *Juncus acutus leopoldii*. These plants are part of the existing landscaping design and are not naturally occurring within the Plant No. 2. Removal of these plants and ornamental vegetation along the southern perimeter of the treatment plant will not impact sensitive species or habitat since the existing vegetation does not provide natural habitat values and was planted as ornamental landscape vegetation. Mitigation Measures BIO-1 included in the PEIR will be implemented to ensure potential impacts to nesting birds are avoided or minimized (see p.3.3-12 of the PEIR) during vegetation removal activities. As a result, the construction of the proposed project modifications to the perimeter screening wall will not change the conclusions of the PEIR.

Once constructed, the new perimeter wall will not affect neighboring habitat areas. The facility will function similar to existing conditions. This finding is consistent with the impact determination in the PEIR; no new significant impacts will occur, no increase of a previously identified significant impact will occur, and no new mitigation measures are required.

Mitigation Measure from the 2017 BMP PEIR

BIO-1: If removal of onsite trees and vegetation associated with the proposed program occurs during the non-nesting season (September 1 to February 14 for songbirds; September 1 to January 14 for raptors), no nesting survey or biological monitor are required.

If the removal of onsite trees and vegetation associated with the proposed program occurs during the nesting season (February 15 to August 31 for songbirds; January 15 to August 31 for raptors), a qualified biologist shall conduct a survey prior to vegetation removal activities to determine if there are active nests within the onsite trees and vegetation proposed for removal. If an active nest is not found, no biological monitor is required. If active nests are detected, a minimum buffer (e.g., 300 feet for songbirds or 500 feet for raptors) around the nest shall be delineated and flagged, and no construction activity shall occur within the buffer area until a qualified biologist determines the nesting species have fledged and is no longer active or the nest has failed. The buffer may be modified (i.e., increased or decreased) and/or other recommendations proposed (e.g., a temporary soundwall) as determined appropriate by the qualified biologist to minimize impacts. The qualified biologist shall monitor the removal of onsite trees and vegetation. Nest buffer distance will be based on species, specific location of the nest, the intensity of construction activities, existing disturbances unrelated to the proposed program present in the program area, and other factors.

If grading/excavation or pile driving activities associated with the proposed program are scheduled outside the nesting season, no nesting survey or biological monitor are required.

If grading/excavation or pile driving activities associated with the proposed program are scheduled during the nesting season, a qualified biologist shall conduct a survey, prior to grading/excavation or pile driving activities, of suitable nesting habitat within 500 feet of construction activities for the presence of nesting birds. If no active nests are detected, no biological monitor is required. If an active nest is detected, a minimum buffer (e.g., 300 feet for songbirds or 500 feet for raptors) around the nest shall be delineated and the active nest shall be flagged, and no construction activity shall occur within the buffer area until a qualified biologist determines the nesting species have fledged and is no longer active or the nest has failed. The qualified biologist shall monitor the activities of the active nests within the buffer area. The buffer may be modified (i.e., increased or decreased) and/or other recommendations proposed (e.g., a temporary soundwall) as determined appropriate by the qualified biologist to minimize impacts. Nest buffer distance will be based on species, specific location of the nest, the intensity of construction activities, existing disturbances unrelated to the proposed program present in the program area, and other factors.

If there is a lapse of construction activities associated with the proposed program during the nesting season for seven days or more, an additional nesting bird survey

shall be conducted to determine if a nest is present prior to construction activities resuming. The procedure identified above for no active nest and an active nest shall be followed.

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?

TPAD Digester Facility

The PEIR stated that the majority of OC San Plant No. 2 consists of paved surfaces with no habitat values. The closest sensitive habitats exist within Talbert Marsh 25 feet south of the existing perimeter fence. The PEIR concluded that the construction of the TPAD facilities would not result in direct or indirect impacts to riparian habitat or other sensitive natural communities.

The modifications to the TPAD facilities involve additional facilities within the treatment plant site. No new impacts to riparian habitats or identified sensitive natural communities from construction will occur.

Once constructed, the modified TPAD facilities will function as assumed in the PEIR. Therefore, no new significant impacts will occur, no substantial increase in the severity of previously identified significant impacts would occur, and no new mitigation measures are required.

South Perimeter Wall

The PEIR assumed that the construction of the new perimeter screening project would be confined to within the treatment plant site. The PEIR concluded that impacts from construction of the perimeter screening improvements would not directly or indirectly affect adjacent sensitive habitats.

The construction of the south perimeter wall will be adjacent to the Talbert Marsh. As modified, the construction footprint for the new perimeter wall will extend to within approximately 16 feet from the edge of the marsh. An approximately 6-foot wide bike lane and an approximately 10-foot wide shoulder will be maintained during construction providing 16 feet between the marsh and construction activities. This construction edge will be maintained with temporary construction fencing. As a result, no marsh habitat will be affected.

As to indirect effects, as stated in the PEIR, stormwater runoff will be controlled through the preparation of a stormwater pollution prevention plan (SWPPP) which will include Best Management Practices (BMPs) that will be implemented during construction to prevent any surface runoff or debris from entering the Talbert Marsh. Noise and disruption associated with construction activities will be confined to day time hours, minimizing indirect effects of the construction. The construction zone controls and work

time restrictions will be similar to the measures identified in the PEIR to minimize indirect impacts. Although the construction activities would occur closer to the Talbert Marsh than the project evaluated in the PEIR, direct and indirect effects to the marsh would be avoided through BMPs included in the PEIR.

Once constructed, the edge of the south perimeter wall will be approximately 25 feet from the Talbert Marsh, similar to the existing 25-foot distance. The PEIR concluded that the new perimeter wall will not impinge on surrounding habitats. For the reasons explained above, the proposed modifications do not alter this conclusion. Therefore, no new significant impacts will occur, no substantial increase of previously identified significant impacts would occur, and no new mitigation measures are required.

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?

TPAD Digester Facility

The PEIR concluded in Section 3.3.3 that the TPAD facilities would not affect wetlands. The proposed modifications to the TPAD Digester Facility will occur on disturbed areas within Plant No. 2 and will not affect any wetlands.

Construction of the proposed, modified TPAD facilities will not have the potential to directly or indirectly affect wetlands since construction activities will occur entirely within the footprint of the treatment plant which is devoid of wetlands.

Once constructed, the distance from the plant perimeter wall will 25 feet from the nearest wetland, similar to the existing distance from the fence to the marsh. Therefore, no impacts to wetlands will occur. The Project Modifications to the TPAD facilities will not alter the conclusions of the PEIR.

South Perimeter Wall

The PEIR evaluated impacts to wetlands from the construction of the perimeter screening project and concluded that the project would not directly or indirectly affect wetlands.

Construction of the perimeter wall will not have the potential to directly or indirectly affect wetlands since construction activities will occur 10 feet from the edge of the marsh as shown in Figure 5. BMPs such as straw wattles and construction fencing will be implemented to prevent stormwater runoff and consruction equipment from leaving the facility.

Once constructed, the distance from the plant perimeter wall will 25 feet from the nearest wetland, similar to the existing distance from the fence to the marsh. Therefore, no impacts to wetlands will occur. The Project Modifications to the perimeter screening will not alter the conclusions of the PEIR.

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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?

TPAD Digester Facility

The PEIR concluded that construction and operation of the TPAD facilities within Plant No. 2 would not affect wildlife movement. The site is an active wastewater treatment plant and does not accommodate a wildlife movement corridor.

The modified TPAD facilities would still be constructed and operated within the same approximate footprint within Plant No. 2 and therefore would not alter this conclusion. No new significant impacts will occur, no substantial increase in previously identified significant impacts would occur, and no new mitigation measures are required.

South Perimeter Wall

The PEIR concluded that the perimeter screening project would have no effect on wildlife movement. Construction of the new perimeter wall will remove vegetation, but will not alter wildlife movement since wildlife does not enter the treatment plant from offsite. The new perimeter wall will not affect any wildlife movement offsite.

Once constructed, the wall called for in the project modifications will act as a barrier to ground-dwelling animals such as rodents and reptiles. The wall will reduce any movement onto the plant site from the marsh. Since the existing treatment plant site is an industrial area, the new barrier will keep ground-dwelling wildlife from harm's way if they will otherwise venture onto the plant site. No new significant impacts will occur, no substantial increase in the severity of previously identified significant impacts would occur, and no new mitigation measures are required.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

TPAD Digester Facility

As discussed in Section 3.3.3 of the PEIR (see p.3.3-16 of the PEIR), the City of Huntington Beach General Plan and Municipal Code do not contain local policies or ordinances to protect biological resources on non-City properties. The Local Coastal Plan (LCP), however, does include measures to protect environmentally sensitive habitat areas (ESHA) as defined in the California Coastal Act. Construction of the TPAD facilities will occur entirely within the treatment plant and will not impact ESHA. The projects will require approval from the City of Huntington Beach LCP. OC San will submit an application for a Coastal Development Permit (CDP) and Conditional Use Permit (CUP) for the TPAD project.

The modifications to the TPAD facilities will not alter this requirement. The project modifications will be subject to these local ordinances, consistent with the conclusions of the PEIR.

The new DC-M building will require excavation to underground the utilities and to construct the building foundation. This excavation would be close to the existing eucalyptus trees that currently line the western plant boundary and could impact the root system of the existing trees. The impacted eucalyptus trees may be removed to avoid future hazards of dead tree branches or entire trees falling into the Plant or on the sidewalk along Brookhurst Street. If the trees are removed, they would be replaced with containerized trees with crowns reaching 10 to 15 feet tall. Since the border trees provide no habitat values, no impacts to sensitive biological resources would occur. Since the City of Huntington Beach does not have a tree ordinance, the potential tree removals on OC San property would not require any authorization. Once constructed, the new TPAD facilities will not impact any policy or ordinance. No new significant impacts will occur, no substantial increase in the severity of previously identified significant impacts would occur, and no new mitigation measures are required.

South Perimeter Wall

The PEIR concluded that removal of the perimeter trees as part of the perimeter screening project would be consistent with local tree ordinance policies. The Project Modifications do not alter this conclusion since the existing vegetation does not constitute sensitive habitat, and no special status trees would be removed.

Once constructed, the perimeter wall will function as the edge of the treatment plant consistent with existing conditions. No new significant impacts will occur, and no new mitigation measures are required.

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?

TPAD Digester Facility and South Perimeter Wall

The PEIR identified that the project area is located within the Orange County Habitat Conservation Plan/Natural Community Conservation Plan (HCP/NCCP) (CDFW 2022). However, the project site is not within an area that is specifically protected or has additional conditions for conservation. Construction of the TPAD facilities will not affect vegetation within the HCP/NCCP. Construction of the new perimeter wall will occur within the treatment plant site and slightly beyond onto the bike path, 16 feet from the closest sensitive area. This activity will not require approval form the HCP/NCCP since no listed species or sensitive habitats will be affected. The proposed modifications will not alter this condition since the project footprint has not changed.

Once constructed, the edge of the south perimeter wall will remain 25 feet from the edge of the Talbert Marsh. The proposed project modifications to the perimeter screening will not impact the marsh and will not conflict with the HCP/NCCP. No new significant impacts will occur, no substantial increase in the severity of previously identified significant impacts would occur, and no new mitigation measures are required.

Summary of Potential Effects on Biological Resources

The proposed modifications will not result in new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects, with respect to biological resources. No further environmental review is required. (Public Resources Code § 21166; CEQA Guidelines § 15162.).

References

California Department of Fish and Wildlife (CDFW), 2022. NCCP Plan Summary- County of Orange (Central/Coastal) NCCP/HCP. Available at: https://www.wildlife.ca.gov/Conservation/Planning/NCCP/Plans/Orange-Coastal, accessed August 30, 2022.

Cultural Resources

Issues (and Supporting Information Sources):		*Yes*	*No*
V.	**CULTURAL RESOURCES —** Would project modifications, changed circumstances, or new information substantially increase the severity of significant impacts identified in the previous CEQA document or result in new significant impacts that could**:**		
a)	Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	☐	☒
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒
c)	Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒

Discussion

a) Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

TPAD Digester Facility and South Perimeter Wall

A cultural resources evaluation regarding potential historic properties within Plant No. 2 was conducted for the PEIR. The evaluation concluded that there are no previously identified historical resources in Plant No. 2 or within ¼-mile of Plant No. 2 that could be directly or indirectly affected by the proposed Project.

The modifications to the TPAD facility and perimeter wall will not alter the construction area footprint evaluated in the PEIR. Therefore, no new significant impacts will result from construction or operation of the modified TPAD facilities, no substantial increase in the severity of previously identified significant impacts would occur, and no new mitigation measures are required.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

TPAD Digester Facility and South Perimeter Wall

As discussed in Section 3.4.3 of the PEIR (p. 3.4-27), no archaeological resources were identified in the proposed project site or in close proximity to the project site. The PEIR concluded that previously unknown archeological resources may be encountered with respect to excavations located within a favorable area (near water sources) for prehistoric inhabitance. The PEIR concludes that with implementation of **Mitigation Measures CUL-1 through CUL-4** potential impacts will be avoided or minimized.

These measures will apply to the updated project. The Project Modifications will all occur within the area evaluated in the PEIR. The Project Modifications will include CDSM and CIDH that will drill through deposits identified in the PEIR as requiring monitoring. The placement of concrete will occur at depths generally below the deposits with potential archaeological resources. As a result, with implementation of Mitigation Measures CUL-1 through CUL-4, impacts would remain less than significant similar to

the conclusions of the PEIR. The potential for impacts to known archaeological resources will be similar to the conclusions of the PEIR for both construction and operation.

Once constructed, the Project Modifications will not affect archaeological resources. As a result, the project modifications will not result in a new significant impact or substantially increase the severity of a previously identified impact. No new mitigation is required. This finding is consistent with the impact determination in the PEIR.

Mitigation Measures from the 2017 BMP PEIR

CUL-1: Prior to start of grading or excavation activities associated with the proposed program and within Plant No. 1 and Plant No. 2, OCSD shall retain a qualified archaeologist meeting the Secretary of the Interior's Professional Qualifications Standards for archaeology (U.S. Department of the Interior 2008) to carry out all mitigation related to archaeological resources.

CUL-2: Prior to start of grading or excavation activities associated with the proposed program and within Plant No. 1 and 2, the qualified archaeologist (or an archaeologist working under the direct supervision of the qualified archaeologist) shall conduct cultural resources sensitivity training for all construction personnel. Construction personnel shall be informed of the types of archaeological resources that may be encountered, the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains, and safety precautions to be taken when working with archaeological monitors. OCSD shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.

CUL-3: Archaeological and Native American monitoring shall be conducted for grading or excavation activities associated with the proposed program at Plant No. 1 and Plant No. 2. Archaeological monitoring shall be conducted by an archaeologist familiar with the types of archaeological resources that could be encountered within the program area, and under the direct supervision of the qualified archaeologist. The frequency of monitoring shall take into account the rate of excavation and grading activities, the materials being excavated (native versus artificial fill soils and older versus younger soils), and the depth of excavation. The frequency of the monitoring shall be determined by the qualified archaeologist in consultation with the Native American monitor and in coordination with OCSD. The Native American monitor shall be selected from a tribe that is culturally and traditionally affiliated with the program area as indicated by the NAHC. In the event that archaeological resources are unearthed during ground-disturbing activities, the archaeological monitor and/or Native American monitor shall be empowered to halt or redirect ground-disturbing activities away from the vicinity of the discovery until OCSD, a qualified archaeologist, and a Native American monitor have evaluated the discovery and determined appropriate treatment (as prescribed in CUL-4). The archaeological monitor shall keep daily logs detailing the types of activities and

soils observed, and any discoveries. After monitoring has been completed, the qualified archaeologist shall prepare a report that details the results of monitoring for submittal to OCSD, the South Central Coastal Information Center, and any Native American tribe that requests a copy.

CUL-4: In the event of the unanticipated discovery of archaeological materials during grading or excavation activities associated with the proposed program, OCSD shall immediately cease all work activities in the area (within approximately 100 feet) of the discovery until it can be evaluated by the qualified archaeologist. Construction shall not resume until the qualified archaeologist has conferred with OCSD on the significance of the resource.

In the event that preservation in place is determined to be infeasible and data recovery through excavation is the only feasible mitigation available, an Archaeological Resources Treatment Plan shall be prepared and implemented by the qualified archaeologist in consultation with OCSD that provides for the adequate recovery of the scientifically consequential information contained in the archaeological resource. OCSD shall consult with appropriate Native American representatives in determining treatment for prehistoric or Native American resources to ensure cultural values ascribed to the resource are considered.

c) Disturb any human remains, including those interred outside of dedicated cemeteries?

TPAD Digester Facility and South Perimeter Wall

The PEIR concludes in Section 3.4.3 that although unlikely, excavation may encounter human remains. **Mitigation Measure CUL-9** ensures that any remains will be handled appropriately to avoid a significant impact.

The Project Modifications will include CDSM and CIDH drilling activities. The placement of concrete will occur at depths generally below the deposits with potential remains. As a result, with implementation of Mitigation Measures CUL-1 through CUL-4, impacts would remain less than significant similar to the conclusions of the PEIR. The modifications to the project will be subject to similar mitigation and do not alter the conclusions in the PEIR. Once constructed, no impact would occur, consistent with the conclusions in the PEIR

Mitigation Measures from the 2017 BMP PEIR

CUL-9: If human remains are encountered during construction activities associated with the proposed program, OCSD or its contractor shall halt work in the vicinity (within 100 feet) of the find and contact the Orange County Coroner in accordance with PRC Section 5097.98 and Health and Safety Code Section 7050.5. If the County Coroner determines that the remains are Native American, the NAHC will be notified in accordance with Health and Safety Code Section 7050.5, subdivision (c), and PRC Section 5097.98. The NAHC will designate a Most Likely Descendant

(MLD) for the remains per PRC Section 5097.98. Until the landowner has conferred with the MLD, OCSD shall ensure that the immediate vicinity where the discovery occurred is not disturbed by further activity, is adequately protected according to generally accepted cultural or archaeological standards or practices, and that further activities take into account the possibility of multiple burials.

Summary of Potential Effects on Cultural Resources

The proposed modifications will not result in new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects, with respect to cultural resources. No further environmental review is required. (Public Resources Code § 21166; CEQA Guidelines § 15162.).

Energy

Issues (and Supporting Information Sources):		*Yes*	*No*
VI.	**ENERGY —** Would project modifications, changed circumstances, or new information substantially increase the severity of significant impacts identified in the previous CEQA document or result in new significant impacts that could**:**		
a)	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☒
b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☒

Discussion

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation

TPAD Digester Facility and South Perimeter Wall

Electricity

The PEIR evaluated energy requirements for implementation of the entire BMP on page 2-30. The PEIR summarizes emissions from energy use on page 3.2-27. However, the PEIR did not provide any conclusions regarding the wasteful, inefficient, or unnecessary consumption of energy resources, since it was not a CEQA requirement at the time of the PEIR's certification.

The modified TPAD facility would require similar amounts of electricity during construction as anticipated in the PEIR with the addition of the power needed for the batch plant. The batch plant is needed to supply the volume of concrete needed to construct the TPAD facility foundations. This additional energy use would not be wasteful, but would enhance efficiency by producing construction materials needed on site.

As discussed in Chapter 2, *Project Description*, and in Section 3.6, *Greenhouse Gas Emissions*, of the PEIR, once constructed, the project will increase the energy efficiency of the facilities, and as such, will not generate a net demand for energy from outside of Plant No. 2 that cannot be supported by the existing CenGen facility at Plant No. 2.

The proposed Project Modifications will decrease the number of digesters compared to existing conditions and increase the number of boilers by one compared to the PEIR (i.e., three boilers with a fourth in the future compared to two boilers with a third in the future). The primary fuel source for the boilers is intended to be digester gas. Natural gas would be supplemented only if sufficient digester gas is not available; however, it is not known if or when this would be needed. Only two of the new boilers would operate at a time, and would do so in a lead/lag fashion, responding to heating demands that vary throughout the day and by season. Since the primary fuel source would be digester gas, the net demand for energy would be minimal.

Electricity transmission to the project site is provided and maintained by Southern California Edison (SCE). During construction of the project modifications, electricity will be consumed to supply and convey water for dust control and, on a limited basis, may be used to power lighting, electronic equipment, and other construction activities necessitating electrical power. The proposed project modifications' temporary construction electrical demand will be offset by the energy efficiency upgrades for the facility. Electricity for construction will be obtained from the existing electrical lines that connect to the project site. When not in use, electric equipment will be powered off to avoid unnecessary energy consumption. Electricity use from construction will be short-term, limited to working hours, used for necessary construction-related activities, and represent a small fraction of the project modifications' net annual operational electricity.

Electrical construction equipment will also comply with California Code of Regulations, Title 24 requirements, which are a set of prescriptive standards establishing mandatory maximum energy consumption levels for buildings. Although Title 24 requirements typically apply to energy usage for buildings, long-term construction lighting (longer than 120 days) providing illumination for the project site and staging areas will also comply with applicable Title 24 requirements, which includes limits on the wattage allowed per specific area, resulting in the conservation of energy.[1] In addition, construction equipment will comply with energy efficiency requirements contained in the Federal Energy Independence and Security Act or previous Energy Policy Acts for electrical motors and equipment.[2] Therefore, construction of the project modifications will not result in the wasteful, inefficient, or unnecessary consumption of electricity. Accordingly, impacts will be less than significant, and no mitigation measures will be required.

Once constructed, the project will be required to comply with Title 24 standards and applicable California Code of Regulations, and Title 11 (CALGreen) requirements, which include the incorporation of energy efficient water features, lighting, and mechanical equipment to reduce energy consumption. The proposed project modifications will be required to comply with the most recent State Energy Conservation Standards contained in Title 24 of the CCR standards, which is a set of prescriptive standards establishing mandatory maximum energy consumption levels for buildings. Along with CALGreen requirements, these standards include minimum energy efficiency requirements related to building envelope, mechanical systems (e.g., heating, ventilation, and air conditioning [HVAC] and water heating systems), indoor and outdoor lighting, and illuminated signs. Therefore, operation of the project modifications will not result in the wasteful, inefficient, or unnecessary consumption of electricity. Accordingly, impacts will be less than significant, and no new mitigation measures will be required.

Natural Gas

Natural gas will be provided to the project site by Southern California Gas (SoCalGas). Construction activities, including the construction of new buildings and facilities,

1 California Building Energy Efficiency Standards, Title 24, Part 6, §110.9, §130.0, and §130.2.

2 Energy Independence and Security Act of 2007. (Pub.L. 110-140).

typically do not involve the consumption of natural gas. Thus, there will be no demand generated by construction, especially when compared to the design changes relative to the Project, discussed above. Therefore, construction of the project modifications will not result in the wasteful, inefficient, or unnecessary consumption of natural gas.

Once constructed, natural gas required for operation of the TPAD facility will be supplied by SoCalGas from existing natural gas facilities. The project will be required to comply with Title 24 standards and CALGreen requirements, which includes the incorporation of energy efficient water features, lighting, and mechanical equipment to reduce energy consumption. Therefore, like the project, operation of the project modifications will not result in the wasteful, inefficient, or unnecessary consumption of natural gas. This finding is consistent with the impact determination in the PEIR; no new significant impacts will occur, and no new mitigation measures are required.

Transportation Fuel

The concrete batch plant will require sand, gravel, and Portland cement deliveries to the site to produce the concrete. The PEIR accounted for 600 delivery trucks during construction. As discussed in Section III, *Air Quality*, Item (a), the concrete batch plant will require sand, gravel, and Portland cement deliveries to the site to produce the concrete. The material deliveries associated with the concrete batch plant and related supplies under the project modifications is conservatively estimated to add up to 1,200 delivery trucks (60 for the TPAD facility and an additional 600 for the perimeter wall), or approximately 4 to 5 trucks per day over the 125 work days for the concrete batch plant, on top of those accounted for in the PEIR. The minimal number of 4 to 5 trucks per day would not impact local or regional fuel supplies. As the trucks would be used to deliver necessary supplies to the project site and comply with all applicable regulations including anti-idling restrictions and truck fleet engine standards, impacts will be less than significant, and no new mitigation measures will be required.

Once constructed, the TPAD facility would add approximately 30 additional workers beyond what was assumed in the PEIR. The approximately 30 additional workers would also not contribute substantially to vehicle miles traveled (VMT) (refer to Section XVII, *Transportation*, Item (b), below, which determined that the project modifications would not result in substantial VMT). Therefore, similar to the project, transportation fuel demand for the project modifications will not result in the wasteful, inefficient, or unnecessary consumption of energy, particularly given the minor design changes relative to the project as discussed above. Accordingly, impacts will be less than significant, and no new mitigation measures will be required. This finding is consistent with the impact determination in the PEIR; no new significant impacts will occur, and no new mitigation measures are required.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency

TPAD Digester Facility and South Perimeter Wall

Electricity

Similar to the project, the Project Modifications' construction electrical demand will be obtained from the existing electrical lines that connect to the Plant No. 2. Electricity use from construction will be short-term, limited to working hours, used for necessary construction-related activities, and represent a small fraction of the Modified Project's net annual operational electricity.

During operation, power will be distributed to the TPAD Digester Facility from a new electrical power building (Distribution Center M [DC-M]), with additional partial basement. The project modifications will be required to comply with the most recent State Energy Conservation Standards contained in Title 24 of the CCR standards, which is a set of prescriptive standards establishing mandatory maximum energy consumption levels for buildings. Along with CALGreen requirements, these standards include minimum energy efficiency requirements related to building envelope, mechanical systems (e.g., heating, ventilation, and air conditioning [HVAC] and water heating systems), indoor and outdoor lighting, and illuminated signs. Therefore, operation will not result in conflict or obstruction of state or local plans for renewable energy to energy efficiency.

Natural Gas

Natural gas, as needed, will be provided to Plant No. 2 by Southern California Gas (SoCalGas). Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. Thus, there will be no demand generated by construction, especially when compared to the design changes relative to the project, discussed above. Therefore, construction of the project modifications will not result in the conflict or obstruction of state or local plans for renewable energy to energy efficiency.

Natural gas, if needed for the proposed project modification's operation, will be supplied by SoCalGas from existing natural gas facilities. However, the project modifications will require construction of new, on-site gas distribution lines to serve the new Boiler Facility. The project modifications will increase the number of boilers by one compared to the PEIR (i.e., three boilers with a fourth in the future compared to two boilers with a third in the future). The primary fuel source for the boilers is intended to be digester gas. Natural gas would be supplemented only if sufficient digester gas is not available; however, it is not known if or when this would be needed. Only two of the new boilers would operate at a time, and would do so in a lead/lag fashion, responding to heating demands that vary throughout the day and by season. Since the primary fuel source would be digester gas, the net demand for energy would be minimal. The project modifications will be required to comply with Title 24 standards and CALGreen requirements, which includes the incorporation of energy efficient water features, lighting, and mechanical equipment to

reduce energy consumption. Therefore, operation will not result in the conflict or obstruction of state or local plans for renewable energy to energy efficiency. Accordingly, impacts will be less than significant, and no mitigation measures will be required.

Transportation Fuel

The proposed modifications to the existing south perimeter screening will require bore/drill rigs, which were not considered in the PEIR. Additionally, the proposed modifications will require an increase in the amount of soil export than was considered in the PEIR.

The PEIR accounted for 600 delivery trucks during construction. As discussed above, the material deliveries associated with the concrete batch plant and related supplies under the project modifications is conservatively estimated to add up to 1,200 delivery trucks (60 for the TPAD facility and an additional 600 for the perimeter wall), or approximately 4 to 5 trucks per day. The minimal number of 4 to 5 trucks per day would not impact local or regional fuel supplies. As the trucks would be used to deliver necessary supplies to the project site and comply with all applicable regulations including anti-idling restrictions and truck fleet engine standards, impacts will be less than significant, and no mitigation measures will be required.

The bore/drill rigs will require diesel fuel. Based on the analysis in Section VIII, *Greenhouse Gas Emissions*, of this Addendum, the increase in construction transportation fuel from the project modifications will be approximately 1 percent compared to the project, which will not be a substantial increase. Construction transportation fuel demand will be temporary and will cease once construction activities are completed. Furthermore, transportation fuel demand will occur for necessary construction activities, such as drilling and hauling of excavated materials.

During operations, the project modifications would add approximately 30 additional workers beyond what was assumed in the PEIR. The approximately 30 additional workers would also not contribute substantially to vehicle miles traveled (VMT) (refer to Section XVII, *Transportation*, Item (b), below, which determined that the project modifications would not result in substantial VMT). Similar to the project, the project modifications will not generate a substantial long-term increase in transportation fuel demand and would not generate substantial VMT in conflict with transportation plans such as the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

Therefore, like the project, transportation fuel demand for the proposed project modifications will not result in any substantial increase in transportation energy and will not result in the conflict or obstruction of state or local plans for renewable energy to energy efficiency. This finding is consistent with the impact determination in the PEIR; no new significant impacts will occur, and no new mitigation measures are required.

Summary of Potential Effects on Energy

The proposed modifications will not result in substantial changes to energy, cause new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects, with respect to energy. No further environmental review is required. (Public Resources Code § 21166; CEQA Guidelines § 15162.).

References

California Building Energy Efficiency Standards, Title 24, Part 6, §110.9, §130.0, and §130.2.

Energy Independence and Security Act of 2007. (Pub.L. 110-140).

Geology and Soils

Issues (and Supporting Information Sources):	*Yes*	*No*
VII. GEOLOGY AND SOILS — Would project modifications, changed circumstances, or new information substantially increase the severity of significant impacts identified in the previous CEQA document or result in new significant impacts that could**:**		
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:		
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.	☐	☒
ii) Strong seismic ground shaking?	☐	☒
iii) Seismic-related ground failure, including liquefaction?	☐	☒
iv) Landslides?	☐	☒
b) Result in substantial soil erosion or the loss of topsoil?	☐	☒
c) Be located on a 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?	☐	☒
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?	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒

Discussion

a.i, ii, iii, iv) 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; Strong seismic ground shaking, Seismic related ground failure including liquefaction, or landslides

TPAD Digester Facility

The PEIR described that the treatment plant is not within a designated Alquist-Priolo Earthquake Fault Zone (AP Zone), but is within an area with active splays of the Newport-Inglewood fault (DOC 1998) susceptible to seismic ground shaking. As discussed in Section 3.5-1 of the PEIR (p.3.5-12), geotechnical studies conducted on Plant No. 2 by Kleinfelder (2017) have identified the presence of fault traces associated with the Newport-Inglewood fault zone directly under the Plant. As discussed in Section 3.5-1 in the PEIR (p.3.5-13), the Newport-Inglewood-Rose Canyon fault is capable of generating a magnitude (Mw) 7.1 earthquake and has an estimated slip rate of 0.5 to 2.0 millimeters per year.

The Project Modifications would occur in the same project footprint and would therefore not alter the conclusions of the PEIR. However, as a measure to increase seismic resilience, the Project Modifications will include CDSM and jet grouting as a construction method to support foundations of the new facilities. The modifications to the TPAD Digester Facility involve new equipment and structures located within the treatment plant. Construction of the TPAD facilities will implement the recommendations of geotechnical evaluations conducted during design and will comply with the California Building Code (CBC) guidelines and local codes. Adherence to the CBC standards will ensure the strongest structures feasible, with no increased risk to human life. Construction related impacts will be less than significant, and no new mitigation measures are required.

Once constructed, the Project Modifications will provide greater protection from seismic hazards and would not alter the conclusions of the PEIR. The facilities will not alter the conclusions of the PEIR. Impacts will be less than significant, and no new mitigation measures are required.

South Perimeter Wall

The PEIR evaluated a perimeter screening project. The Project Modifications include construction of a perimeter wall in place of the fence and vegetated berm. Construction of the wall foundation system requires deep soil mixing to 50 to 75-feet below ground surface and CIDH piles to enhance the strength of the wall. Deep soil mixing will be implemented in a 45-foot-wide strip (to a depth of 35 to 45-feet below ground surface) parallel to the southern perimeter to provide lateral spread mitigation and to support the wall's foundation. The modified perimeter wall will be subject to CBC standards. Once constructed, the Project Modifications will provide greater protection from seismic hazards and would not alter the conclusions of the PEIR. The modifications to the perimeter screening will not alter the conclusions of the PEIR during construction or operation.

b) Result in substantial soil erosion or the loss of topsoil?

TPAD Digester Facility

The PEIR concluded that the TPAD facility would not result in soil erosion or the loss of topsoil since the project area is currently within a developed and paved treatment plant. As discussed in Section 3.5.3 in the PEIR (see p.3.5-15 of the PEIR), construction activities will be required to comply with SCAQMD Rule 403 for dust control. This will prevent wind erosion and subsequent topsoil loss, while ensuring that construction activities generating wind-induced soil erosion are below SCAQMD significance thresholds. The Project Modifications would construct facilities within the same footprint as described in the PEIR. SWPPP BMPs will be implemented to prevent erosion associated with runoff from the project area during construction. Compliance with the SWPPP and BMPs will prevent soil erosion and loss of topsoil as concluded in the PEIR.

Once constructed, the new facility will capture stormwater on site that will prevent off site erosion as concluded in the PEIR. Therefore, the modifications will not alter the impact analysis in the PEIR; impacts will be less than significant, and no new mitigation measures are required.

South Perimeter Wall

The PEIR concluded that implementation of construction related SWPPP BMPs would reduce the potential for runoff and erosion. The Project Modifications to the perimeter screening will be subject to the same SWPPP BMPs to prevent erosion associated with runoff from the project area during construction. Compliance with the SWPPP and BMPs will prevent soil erosion and loss of topsoil. The Project Modifications will not alter the conclusions of the PEIR.

Once constructed, the new facility will capture stormwater on site that will prevent off site erosion. Therefore, the modifications will not alter the impact analysis in the PEIR; impacts will be less than significant, and no new mitigation measures are required.

c) Be located on a 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?

TPAD Digester Facility

The PEIR identified in Section 3.5.3 (p. 3.5-16) that the project area is not in an area that is subject to subsidence as identified in the City of Huntington Beach General Plan (City of Huntington Beach 2017). Therefore, no impacts related to subsidence are anticipated. The construction of the TPAD facilities will occur within the same project footprint as the project described in the PEIR and would comply with guidelines set by the CBC. The Project Modifications increase protection from unstable soil hazards including CDSM and jet grouting as a construction method to support foundations of the new facilities.

Once constructed, the facilities will be more resilient to geologic hazards such as subsidence, liquefaction, collapsible soils, and lateral spreading as a result of design and new construction methods. Impacts will be less than significant, and no new mitigation measures are required.

South Perimeter Wall

The PEIR identified in Section 3.5-3 (p. 3.5-16) that the project area is not in an area that is subject to subsidence as identified in the City of Huntington Beach General Plan (City of Huntington Beach 2017). Therefore, no impacts related to subsidence are anticipated. The new perimeter wall would be approximately in the same location as the perimeter screening described in the PEIR. The construction of the new perimeter wall will comply with guidelines set by the CBC which controls the design and location of facilities in

order to safeguard the public and reduce potential unstable soils impacts. The project modifications will include CDSM and jet grouting as a construction method to support foundations of the new wall. As a result, the Project Modifications increase protection against unstable soils compared with the analysis in the PEIR.

Once constructed, the new wall will be resilient to geologic hazards such as subsidence, liquefaction, collapsible soils, and lateral spreading as a result of design and construction methods. This finding is consistent with the impact determination in the PEIR; impacts will be less than significant, and no new mitigation measures are required.

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?

TPAD Digester Facility

As discussed in Section 3.5.3 of the PEIR (p.3.4- 17), the predominate soil association within the Plant No. 2 is the Heuneme-Bolsa Association, a near level, excessively drained fine sand loams located on alluvial fans and floodplains. The soils are characterized as having a moderate-to-high shrink-swell potential (City of Huntington Beach, 2017). The construction of the TPAD facilities will comply with guidelines set by the CBC which controls the design and location of facilities in order to safeguard the public and reduce potential unstable soils impacts. The Project Modifications will include CDSM and jet grouting as a construction method to support foundations of the new facilities.

Once constructed, the facilities will be more resilient to geologic hazards such as subsidence, liquefaction, collapsible soils, and lateral spreading as a result of design and construction methods. As a result, the Project Modifications increase protection against expansive soils compared with the analysis in the PEIR. Impacts will be less than significant, and no new mitigation measures are required.

South Perimeter Wall

The construction of the new perimeter wall will comply with guidelines set by the CBC which controls the design and location of facilities in order to safeguard the public and reduce potential unstable soils impacts. The project modifications will include CDSM and jet grouting as a construction method to support foundations of the new wall.

Once constructed, the new wall will be resilient to geologic hazards such as subsidence, liquefaction, collapsible soils, and lateral spreading as a result of design and construction methods. As a result, the Project Modifications increase protection against expansive soils compared with the analysis in the PEIR. Impacts will be less than significant, and no new mitigation measures are required.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

TPAD Digester Facility

The PEIR concluded that the proposed project will not include construction of septic tanks or alternative wastewater disposal systems. The project involves construction of digesters and other facilities that treat wastewater. The Project Modifications to the TPAD facilities do not alter the conclusions of the PEIR. Therefore, no new significant impacts will occur, and no new mitigation measures are required.

South Perimeter Wall

The PEIR concluded that the proposed project will not include construction of septic tanks or alternative wastewater disposal systems. The project involves construction of digesters and other facilities that treat wastewater. The proposed modifications to the TPAD facilities do not alter the conclusions of the PEIR. Therefore, no new significant impacts will occur, and no new mitigation measures are required.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

TPAD Digester Facility

As discussed in Section 3.4.3 of the PEIR (p.3.4-30), there are no known fossil localities in proposed project area. However, there are several fossil localities from older Quaternary deposits located within the project area. These localities have yielded a wide variety of vertebrate fossils, however; there is a low potential to uncover significant vertebrate fossil remains during surface grading or shallow excavations. Excavations that extend down into the older Quaternary deposits may encounter significant fossil vertebrate specimens. Since the proposed project includes ground-disturbing activities, there is a potential for discovery of fossils that may be considered significant paleontological resources. If previously unknown potentially unique paleontological resources are uncovered during excavation or construction, significant impacts could occur. The PEIR concludes that with implementation of **Mitigation Measure CUL-5 through CUL-8** as stated in Section 3.5**,** no significant impacts will occur. The proposed modifications to the TPAD facility include additional equipment and structures on site. The Project Modifications will include CDSM and jet grouting as a construction method to support foundations of the new facilities. This construction method will be subject to Mitigation Measures CUL-5-8 to ensure impacts to paleontological resources are minimized, similar to the conclusions in the PEIR. The Project Modifications would require excavation similar to the project evaluated in the PEIR. Therefore, the Modifications would not alter the conclusions of the PEIR.

Once constructed, the facilities will not affect paleontological resources. This finding is consistent with the impact determination in the PEIR; impacts will be less than significant, and no new mitigation measures are required.

South Perimeter Wall

The proposed modifications to the perimeter screening include construction of a new perimeter wall. additional equipment and structures on site. The project modifications will include CDSM and jet grouting as a construction method to support foundations of the new wall. This construction method will be subject to Mitigation Measures CUL-5 through CUL-8 to ensure impacts to paleontological resources are minimized, similar to the conclusions in the PEIR.

Once constructed, the facilities will not affect paleontological resources. This finding is consistent with the impact determination in the PEIR; impacts will be less than significant, and no new mitigation measures are required.

Mitigation Measures from the 2017 BMP PEIR:

> **CUL-5:** Prior to start of excavation activities associated with the proposed program that exceed 10 feet in depth in previously undisturbed sediments, OCSD shall retain a qualified paleontologist meeting the Society for Vertebrate Paleontology (SVP) Standards (SVP 2010) to carry out all mitigation related to paleontological resources. The qualified paleontologist shall be selected from the list of County of Orange certified paleontologists.
>
> **CUL-6**: Prior to start of excavation activities associated with the proposed program that exceed 10 feet in depth in previously undisturbed sediments, the qualified paleontologist, or his or her designee, shall conduct training for construction personnel regarding the appearance of fossils and the procedures for notifying paleontological staff should fossils be discovered by construction staff. OCSD shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.
>
> **CUL-7:** Paleontological resources monitoring shall be performed during excavation activities associated with the proposed program that exceed 10 feet in depth in previously undisturbed sediments by a qualified paleontological monitor (or cross-trained paleontological/archaeological monitor) meeting the standards of the SVP 2010 under the direction of the qualified paleontologist. The monitor shall have the authority to temporarily halt or divert work away from exposed fossils in order to recover the fossil specimens. The qualified paleontologist, based on observations of subsurface soil stratigraphy and/or other factors, may increase, reduce, or discontinue monitoring in coordination with OCSD, as warranted.
>
> If construction or other project personnel discover any potential fossils during construction, regardless of the depth of work, all work shall cease at that location (within 100 feet) until the qualified paleontologist has assessed the discovery and

made recommendations as to the appropriate treatment and re-assessed the depth at which monitoring shall be required.

CUL-8: In the event of a fossil discovery by the paleontological monitor or construction personnel associated with the proposed program, all work in the immediate vicinity of the find shall cease. The qualified paleontologist shall evaluate the find before restarting construction activity in the area. If it is determined that the fossil(s) is (are) scientifically significant, the qualified paleontologist shall recover significant fossils following standard field procedures for collecting and curating paleontological resources, as described by the SVP (2010).

Summary of Potential Effects on Geology and Soils

The proposed modifications will not result in new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects, with respect to geology and soils. No further environmental review is required. (Public Resources Code § 21166; CEQA Guidelines § 15162.).

References

DOC, 1997. *State of California Seismic Hazard Zones, Newport Beach Quadrangle Official Map*. April 17, 1997.

Greenhouse Gas Emissions

Issues (and Supporting Information Sources):	*Yes*	*No*
VIII. GREENHOUSE GAS EMISSIONS — Would project modifications, changed circumstances, or new information substantially increase the severity of significant impacts identified in the previous CEQA document or result in new significant impacts that could**:**		
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☒
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☒

Discussion

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment

TPAD Digester Facility

As discussed in Section 3.6, *Greenhouse Gas Emissions*, of the PEIR, the project will increase the energy efficiency of the facilities, and as such, will not generate a net demand for energy from outside of Plant No. 2 that cannot be supported by the existing CenGen facility at Plant No. 2. The Project Modifications will result in an increase of up to one additional boiler but will not increase demand for energy compared to the project evaluated in the PEIR. The primary fuel source for the boilers is intended to be digester gas. Natural gas would be supplemented only if sufficient digester gas is not available; however, it is not known if or when this would be needed. Only two of the new boilers would operate at a time, and would do so in a lead/lag fashion, responding to heating demands that vary throughout the day and by season. Since the primary fuel source would be digester gas, the net demand for energy would be minimal. Therefore, the proposed project modifications will not increase the net demand for energy during operations, and therefore, no increase in the net generation of GHG emissions from the digesters and boilers will occur.

The on-site concrete batch plant will be electric-powered (i.e., mixing, conveyors, etc.), which will result in generally minimal and temporary electricity demand. GHG emissions related to the electricity-demand will also be minimal and temporary and will not substantially increase the construction-related GHG emissions provided in the PEIR. Thus, the GHG emissions for the concrete batch plant are not quantified as they will not have a significant impact on the environment. The concrete batch plant will require sand, gravel, and Portland cement deliveries to the site to produce the concrete. The material deliveries associated with the concrete batch plant and related supplies under the project modifications is conservatively estimated to add up to 600 delivery trucks, or approximately 4 to 5 trucks per day. Therefore, additional delivery truck emissions will occur under the proposed project modifications and were quantified using the CARB on-road vehicle emissions factor (EMFAC2021) model.

The use of up to three bore/drill rigs will be diesel-powered and the GHG emissions were quantified using the California Emissions Estimator Model (CalEEMod), version

2020.4.0, using the model-provided equipment horsepower and usage factors. The increased amount of soil export will require additional haul truck trips and the increased GHG emissions were quantified based on the haul truck emissions from the certified PEIR and accounting for a longer total duration of hauling to reflect the increased export volume.

Table 6, *Estimated Total Construction-Related GHG Emissions for the Project and Modified Project*, shows the increase in GHG emissions for the proposed project modifications compared to the project. As shown, the modifications will increase construction GHG emissions by approximately 1 percent compared to the project.

TABLE 6
ESTIMATED TOTAL CONSTRUCTION-RELATED GHG EMISSIONS FOR THE PROJECT AND MODIFIED PROJECT

Construction Year	Estimated CO_2e Emissions	
	Certified PEIR Project	Addendum Modified Project
Total	19,362 (MT)	19,534 (MT)
Annual Construction (Amortized over 30 years)	645 (MT/Yr)	651 (MT/Yr)
Percent Increase over Project	—	1%

CO2e= carbon dioxide equivalent; MT =metric tons; MT/yr = metric tons per year.
SOURCE: ESA 2017, 2022

As discussed above, the proposed project modifications will not increase the net demand for energy during operations. The addition of up to 30 workers during operations would result in additional worker vehicle commute trips and worker commute-related GHG emissions of approximately 68 $MTCO_2e$ per year, with declining emissions as workers replace older vehicles with newer, less emitting vehicle models. The minor increase in GHG emissions from the additional workers would represent less than 1 percent of the Buildout Year 2040 with Program GHG emissions and approximately 5 percent of the net annual GHG emissions (Year 2040 Program minus Year 2040 without Program).

Therefore, based on the above, the proposed project modifications will not generate GHG emissions, either directly or indirectly, that will result in new significant impacts, or a substantial increase in the severity of previously identified significant impacts.

South Perimeter Wall

The project modifications will include the replacement of the existing south perimeter screening. The wall foundation system will require deep soil mixing to 50 to 75-feet below ground surface and CIDH piles to approximately 40-feet below ground surface. Additionally, deep soil mixing will be implemented in a 45-foot-wide strip (to a depth of 35 to 45-feet below ground surface) parallel to the Talbert Marsh wall to provide lateral spread mitigation and to support the wall's foundation. The proposed modifications to the

existing south perimeter screening will require an on-site concrete batch plant and bore/drill rigs, which were not considered in the PEIR.

The on-site concrete batch plant will be electric-powered (i.e., mixing, conveyors, etc.), which will result in generally minimal and temporary electricity demand. GHG emissions related to the electricity-demand will also be minimal and temporary and will not increase the construction-related GHG emissions provided in the PEIR. Thus, the GHG emissions for the concrete batch plant are not quantified . The concrete batch plant will require sand, gravel, and Portland cement deliveries to the site to produce the concrete. The PEIR accounted for 600 delivery trucks during construction. As discussed above, the material deliveries associated with the concrete batch plant and related supplies under the project modifications is conservatively estimated to add up to 600 delivery trucks, or approximately 4 to 5 trucks per day. Therefore, additional delivery truck emissions will occur under the proposed project modifications and were quantified using the CARB on-road vehicle emissions factor (EMFAC2021) model.

The use of up to three bore/drill rigs will be diesel-powered and the GHG emissions were quantified using the California Emissions Estimator Model (CalEEMod), version 2020.4.0, using the model-provided equipment horsepower and usage factors. The increased amount of soil export will require additional haul truck trips and the increased GHG emissions were quantified based on the haul truck emissions from the certified PEIR and accounting for a longer total duration of hauling to reflect the increased export volume.

Table 6, *Estimated Total Construction-Related GHG Emissions for the Project and Modified Project*, shows the increase in GHG emissions for the proposed project modifications compared to the project. As shown, the modifications will increase construction GHG emissions by approximately 1 percent compared to the project.

Once constructed, the perimeter wall will not emit GHG.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases

TPAD Digester Facility and South Perimeter Wall

The certified PEIR determined that Project will not conflict with the CARB Scoping Plan, Senate Bill (SB) 375, or with GHG reduction plans for both Cities in which the Project is located. Therefore, the Project will not conflict with applicable GHG reduction plans, policies, and regulations and impacts will be less than significant.

The Project Modifications will not result in any changes to the project that will alter the findings in the PEIR with respect to potential conflicts with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. Similar to the project, the project modifications will upgrade the existing biosolids treatment facilities to improve the energy and water efficiency of the facility consistent with applicable Recommended Actions contained in CARB's Scoping Plan, which include Actions E-1

(increased Utility Energy efficiency programs including more stringent building and appliance standards), GB-1 (Green Building), and W-1 (Increased Water Use Efficiency).

The project modifications would not change the energy efficiency requirements of buildings and operational processes that were evaluated in the PEIR. As such, the project modifications, as was the case with the project as discussed in the PEIR, will not conflict with local GHG reduction plans, policies, and regulations in the City of Fountain Valley and the City of Huntington Beach.

During operations, the project modifications would add approximately 30 additional workers beyond what was assumed in the PEIR. The approximately 30 additional workers would also not contribute substantially to vehicle miles traveled (VMT) (refer to Section XVII, *Transportation*, Item (b), below, which determined that the project modifications would not result in substantial VMT). Similar to the project, the project modifications will not generate a substantial long-term increase in transportation fuel demand and would not generate substantial VMT in conflict with transportation plans such as the Southern California Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). Therefore, the project modifications will not conflict with employment growth projections and related GHG emissions from worker commutes, and will not conflict with vehicle-related GHG emission reduction targets in SB 375.

Based on the above, the project modifications will not conflict with applicable GHG reduction plans, policies, and regulations and will not result in new significant impacts, or a substantial increase in the severity of previously identified significant impacts. This finding is consistent with the impact determination in the PEIR; construction and operation related impacts will be less than significant, and no new mitigation measures are required.

Summary of Potential Effects on Greenhouse Gas Emissions

The proposed modifications will not result in new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects, with respect to greenhouse gas emissions. No further environmental review is required. (Public Resources Code § 21166; CEQA Guidelines § 15162.).

References

California Air Resources Board (CARB). 2008. *Climate Change Scoping Plan*. Approved December 2008. Available at: www.arb.ca.gov/cc/scopingplan/document/adopted_scoping_plan.pdf; Accessed September 2022.

CARB. 2022. What are Sustainable Communities Strategies. https://ww2.arb.ca.gov/our-work/programs/sustainable-communities-program/what-are-sustainable-communities-strategies. Accessed September 2022.

Huntington Beach. 2017. City of Huntington Beach General Plan update Program EIR. p.4.6-7. https://www.huntingtonbeachca.gov/files/users/planning/Volume-II-Draft-Environmental-Impact-Report.pdf. Accessed September 2022.

Hazards and Hazardous Materials

Issues (and Supporting Information Sources):		*Yes*	*No*
IX.	**HAZARDS AND HAZARDOUS MATERIALS —** Would project modifications, changed circumstances, or new information substantially increase the severity of significant impacts identified in the previous CEQA document or result in new significant impacts that could**:**		
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☒
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?	☐	☒
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☒
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?	☐	☒
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?	☐	☒
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☒
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☒

Discussion

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

TPAD Digester Facility

The PEIR evaluated the use of hazardous materials needed to construct the TPAD facilities including drilling, trenching, excavation, grading, demolition, and other ground-disturbing activities. The PEIR noted that these construction activities will require small amounts of routinely used hazardous materials including but not limited to petroleum products (e.g., oil, gasoline, and diesel fuels), automotive fluids (e.g., antifreeze and hydraulic fluids), and other chemicals (e.g., adhesives, solvents, paints, thinners, and other chemicals). No acutely hazardous materials will be used on-site during construction. The PEIR concluded that the materials handled will not pose a significant risk off-site to the public. The construction contractor will be required to comply with all applicable federal, state, and local regulations pertaining to hazardous material use, handling, storage, and disposal, including for hazardous building materials encountered during demolition such as lead-based paint (LBP) and asbestos containing building materials (ACBM). Adherence to these regulations will reduce potential proposed projects construction impacts related to hazardous materials to less than significant levels. The Project Modification to the TPAD facilities will employ the same construction methods and would not alter the conclusions of the PEIR regarding hazardous materials

during construction. The additional CDSM construction method would not require the use of hazardous materials not already evaluated in the PEIR.

The PEIR discussed in Section 3.7.3 (p. 3.7-12) that operation of the proposed TPAD facility will require routine transport, storage, use, and disposal of hazardous materials for purposes of treatment of biosolids. The use of hazardous materials and substances during operation will be subject to the existing and future federal, State, and local health and safety requirements for the handling, storage, transportation, and disposal of hazardous materials. In addition, implementation of OC San's Integrated Emergency Response Plan (IERP) will ensure that all chemicals are properly stored and handled to minimize spills and protect the environment and public health. OC San's compliance with all applicable laws, regulations and the site-specific IERP will minimize the potential impacts to the public or environment due to routine transport, storage, and use of hazardous materials. The proposed Project Modifications to the TPAD facility will not alter the conclusions of the PEIR.

South Perimeter Wall

The PEIR evaluated the perimeter screening project and concluded that compliance with all applicable laws, regulations and the site-specific IERP will minimize the potential impacts to the public or environment due to routine transport, storage, and use of hazardous materials. The Project Modifications to the perimeter screening project include construction of a new wall using CIDH methods. The new construction method would not utilize hazardous materials not already presented in the PEIR. Therefore, the project as modified will not alter the conclusions in the PEIR.

a) 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?

TPAD Digester Facility

The PEIR concludes in Section 3.7.3 (p. 3.7-12) that adherence to regulations during construction will reduce potential proposed projects construction impacts related to hazardous materials to less than significant levels. The modification to the TPAD facilities will not alter the conclusions of the PEIR regarding hazardous materials during construction.

Once constructed, the PEIR concludes that compliance with all applicable laws, regulations and the site-specific IERP will minimize the potential impacts to the public or environment due to routine transport, storage, and use of hazardous materials. The proposed Project Modifications to the TPAD facility will not alter the conclusions of the PEIR.

South Perimeter Wall

The PEIR evaluated the perimeter screening project and concluded that compliance with all applicable laws, regulations and the site-specific IERP will minimize the potential impacts to the public or environment due to routine transport, storage, and use of hazardous materials. The Project Modifications to the perimeter screening project include construction of a new wall using CIDH methods. The new construction method would not utilize hazardous materials not already presented in the PEIR. Therefore, the project as modified will not alter the conclusions in the PEIR.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

TPAD Digester Facility

The PEIR noted that OC San Plant No. 2 is not located within 0.25 mile of a school. The proposed modifications to the TPAD facility would occur within the same footprint as the project evaluated in the PEIR, Therefore, the Project Modifications will not alter the conclusions in the PEIR for construction or operation. Therefore, no new significant impacts will occur, and no new mitigation measures are required.

South Perimeter Wall

The PEIR noted that OC San Plant No. 2 is not located within 0.25 mile of a school. The proposed modifications to the perimeter wall will occur within approximately the same footprint. Therefore, the Project Modifications would not alter the conclusions in the PEIR for construction or operation. Therefore, no new significant impacts will occur, and no new mitigation measures are required.

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?

TPAD Digester Facility and South Perimeter Wall

The PEIR concludes that a database search of hazardous materials sites using the online State Water Resources Control Board (SWRCB) GeoTracker databases identified Plant No. 2 as having two closed leaking underground storage tank (LUST) cases and closed cleanup program site (SWRCB 2022). The proposed Project Modifications to the TPAD facility and perimeter wall would occur within the same approximate footprint as the project evaluated in the PEIR, Therefore, the Project Modifications will not alter the conclusions in the PEIR for construction or operation. Therefore, no new significant impacts will occur, and no new mitigation measures are required.

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?

TPAD Digester Facility and South Perimeter Wall

The PEIR concluded that the nearest airport to the project area is the John Wayne Airport, located approximately 8 miles to the northeast of Plant No. 2, at 18601 Airport Way in the unincorporated area of the Orange County. Therefore, the TPAD facilities are not located within an airport land use plan or within 2 miles of a public airport or public use airport. No new significant impacts will occur, and no new mitigation measures are required.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

TPAD Digester Facility

The PEIR concluded that since the TPAD Digester Facility will be constructed within the treatment plant, neither construction nor operation will require temporary lane or roadway closures or block access to roadways and driveways for emergency vehicles. Truck trips will not require closure of any roadways and will only temporary slow traffic near the treatment plant site. The proposed modifications to the TPAD facility would occur within the same footprint as the project evaluated in the PEIR. The proposed Project Modifications will increase delivery trips, but will not physically interfere with an adopted emergency response plan or emergency evacuation plant. All project facilities will be contained within the boundaries of the treatment plant and project-related vehicles will not block existing street access to the sites. Therefore, the project as modified will not result in any new significant impacts, and no new mitigation measures are required.

The PEIR concluded that operation of the proposed TPAD facility as modified will not impair or physically interfere with an adopted emergency response plan or emergency evacuation plan. The proposed Project Modifications will increase delivery trips, but will not physically interfere with an adopted emergency response plan or emergency evacuation plant. Therefore, the project as modified would not alter the conclusions of the PEIR. Construction and operation related impacts will be less than significant, and no new mitigation measures are required.

South Perimeter Wall

The PEIR concluded that construction of the perimeter screening project would not require temporary lane or roadway closures or block access to roadways and driveways for emergency vehicles. The Project Modifications would construct a new wall at the southern boundary of the treatment plant requiring temporary closure of the bike path. The bike path is not an adopted emergency response or evacuation route. Temporary detours shown in Figure 6 would ensure that bike circulation and County vehicles could

connect Brookhurst Avenue with the Santa Ana River Trail. For these reasons, the Project Modifications will not alter the conclusion in the PEIR. Construction related impacts will be less than significant, and no new mitigation measures are required.

Operation of the proposed perimeter wall will not impair or physically interfere with an adopted emergency response plan or emergency evacuation plan. This finding is consistent with the impact determination in the PEIR; construction and operation related impacts will be less than significant, and no new mitigation measures are required.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

TPAD Digester Facility and South Perimeter Wall

The PEIR concluded that the project site located within the developed Plant No. 2 is not within or in the vicinity of a high fire hazard zone. The project area is not located adjacent to wildlands or near a substantial amount of dry brush that could expose people to wildfire risks. The Project Modifications would occur within the same footprint evaluated in the PEIR. Therefore, the proposed construction and operation of the TPAD facilities as modified will not alter the conclusions of the PEIR.

Summary of Potential Effects on Hazards and Hazardous Materials

The proposed modifications will not result in new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects, with respect to hazards and hazardous materials. No further environmental review is required. (Public Resources Code § 21166; CEQA Guidelines § 15162.)

References

Department of Toxic Substances Control (DTSC), 2022. EnviroStor Database. Available at: https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=Sacramento&tour=True, accessed August 31, 2022.

State Water Resources Control Board (SWRCB), 2022. GeoTracker. Available at: https://geotracker.waterboards.ca.gov/map/?CMD=runreport&myaddress=Sacramento, accessed August 31, 2022.

Hydrology and Water Quality

Issues (and Supporting Information Sources):		*Yes*	*No Impact*
X.	**HYDROLOGY AND WATER QUALITY —** Would project modifications, changed circumstances, or new information substantially increase the severity of significant impacts identified in the previous CEQA document or result in new significant impacts that could**:**		
a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☒

Issues (and Supporting Information Sources):		*Yes*	*No Impact*
b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☒
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:		
	i) result in substantial erosion or siltation on- or off-site;	☐	☒
	ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☒
	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	☐	☒
	iv) impede or redirect flood flows?	☐	☒
d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☒
e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☒

Discussion

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

TPAD Digester Facility

The PEIR noted in Section 3.8.3 (p. 3.8-11) that construction of the proposed TPAD facility will be subject to a General Construction Permit under the NPDES permit project of the federal Clean Water Act. Implementation of a SWPPP and BMPs will ensure that the water quality impacts related to the handling of hazardous materials from proposed project construction will be less than significant. In addition, excavation and construction may require groundwater dewatering. If dewatering is necessary, the project will comply with a Santa Ana Regional Water Quality Control Board (SARWQCB) Groundwater Dewatering General Permit and will not elevate pollutant concentrations beyond existing water quality limitations. The proposed Project Modifications will be subject to the same stormwater and dewatering regulations, and would not alter the conclusions in the PEIR. No new significant impacts will occur, and no new mitigation measures are required.

Once constructed, the site will capture stormwater on site as is currently the case. The proposed Project Modifications will not alter this conclusion. No new significant impacts will occur, and no new mitigation measures are required.

South Perimeter Wall

Similar to the TPAD construction, the perimeter wall construction activities will be subject to a SWPPP and BMPs. Implementation of BMPs will ensure that the construction activities will be protective of water quality standards. The proposed Project Modifications will be subject to the same stormwater and dewatering regulations, and

would not alter the conclusions in the PEIR. No new significant impacts will occur, and no new mitigation measures are required.

Once constructed, the site will capture stormwater on site as is currently the case. The proposed modifications will not alter this conclusion. No new significant impacts will occur, and no new mitigation measures are required.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

TPAD Digester Facility and South Perimeter Wall

The PEIR concludes in Section 3.8.3 (p. 3.8-14) that construction of the TPAD facility would not affect groundwater supplies. The PEIR noted that excavation could encounter groundwater during construction and that dewatering may be required to complete excavation and construction. The PEIR concluded that dewatering during construction in this area will not directly interfere with groundwater supplies or interfere substantially with groundwater recharge. The proposed Project Modifications will be located in the same location and will be subject to the same dewatering regulations. The Project Modifications would not alter the conclusions in the PEIR. No new significant impacts will occur, and no new mitigation measures are required. The proposed modifications to the TPAD facility will not alter this conclusion.

Operation of the TPAD facility and perimeter wall as modified will have no direct effect on groundwater supplies or interfere with groundwater recharge such that there will be a net deficit in aquifer volume or a lowering of the local groundwater table. This finding is consistent with the impact determination in the PEIR (p. 3.8-14); no new significant impacts will occur, and no new mitigation measures are required.

c.i.) result in substantial erosion or siltation on- or off-site

TPAD Digester Facility

The PEIR concluded that the TPAD facility would not result in soil erosion or the loss of topsoil since the project area is currently within a developed and paved treatment plant. As discussed in Section 3.5.3 in the PEIR (see p.3.5-15 of the PEIR), construction activities will be required to comply with SCAQMD Rule 403 for dust control. This will prevent wind erosion and subsequent topsoil loss, while ensuring that construction activities generating wind-induced soil erosion are below SCAQMD significance thresholds. The PEIR concludes that compliance with the SWPPP will prevent erosion associated with runoff from the project area during construction. Compliance with the SWPPP and BMPs will prevent soil erosion and loss of topsoil. The proposed Project Modifications will be subject to the same stormwater regulations, and would not alter the conclusions in the PEIR. No new significant impacts will occur, and no new mitigation measures are required.

Once constructed, the new facility will capture stormwater on site that will prevent off site erosion. Therefore, the Project Modifications will not alter the impact analysis within the PEIR; impacts will be less than significant, and no new mitigation measures are required.

South Perimeter Wall

The PEIR concluded that implementation of construction related SWPPP BMPs would reduce the potential for runoff and erosion. The modifications to the perimeter screening project involves construction of a new perimeter wall. OC San will implement an SWPPP to prevent erosion associated with runoff from the project area during construction. Compliance with the SWPPP and BMPs will prevent soil erosion and loss of topsoil. The proposed Project Modifications will be subject to the same stormwater regulations, and would not alter the conclusions in the PEIR. No new significant impacts will occur, and no new mitigation measures are required.

Once constructed, the new facility will capture stormwater on site that will prevent off site erosion. Therefore, the modifications will not alter the impact analysis of the PEIR; impacts will be less than significant, and no new mitigation measures are required.

c.ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite

TPAD Digester Facility

The PEIR concluded that the TPAD facility would not increase the rate or amount of surface runoff. During construction, compliance with the SWPPP and BMPs will prevent runoff. The proposed Project Modifications will located in the same location as the project evaluated in the PEIR, subject to the same stormwater regulations, and would not alter the conclusions in the PEIR. No new significant impacts will occur, and no new mitigation measures are required.

Once constructed, the new facility will capture stormwater on site that will prevent offsite runoff; impacts will be less than significant, and no new mitigation measures are required.

South Perimeter Wall

The PEIR concluded that the perimeter screening project would not increase runoff. The modifications to the perimeter screening project involves construction of a new perimeter wall. The proposed Project Modifications will be subject to the same stormwater regulations, and would not alter the conclusions in the PEIR. No new significant impacts will occur, and no new mitigation measures are required.

Once constructed, the new facility will capture stormwater on site that will prevent offsite runoff. Therefore, the modifications will not alter the impact analysis in the PEIR; impacts will be less than significant, and no new mitigation measures are required.

c.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

TPAD Digester Facility

The PEIR concluded that the TPAD facility would not contribute to off-site surface runoff. During construction, runoff will be captured on site. The proposed Project Modifications will be located in the same location as the project evaluated in the PEIR, subject to the same stormwater, and would not alter the conclusions in the PEIR. No new significant impacts will occur, and no new mitigation measures are required.

Once constructed, the new facility will capture stormwater on site that will prevent offsite runoff; impacts will be less than significant, and no new mitigation measures are required.

South Perimeter Wall

The PEIR concluded that the perimeter screening project will not increase runoff. The Project Modifications to the perimeter screening project involve construction of a new perimeter wall. The proposed Project Modifications will be subject to the same stormwater regulations, and would not alter the conclusions in the PEIR. No new significant impacts will occur, and no new mitigation measures are required.

Once constructed, the new facility will capture stormwater on site that will prevent offsite runoff. Therefore, the modifications will not alter the impact analysis in the PEIR; impacts will be less than significant, and no new mitigation measures are required.

c.iv) impede or redirect flood flows

TPAD Digester Facility

The PEIR concluded that the TPAD facility would not impede or redirect flood flows. During construction, runoff will be captured on site. The proposed Project Modifications will be located in the same location as the project evaluated in the PEIR, subject to the same stormwater regulations, and would not alter the conclusions in the PEIR. No new significant impacts will occur, and no new mitigation measures are required.

Once constructed, the new facility will capture stormwater on site; impacts will be less than significant, and no new mitigation measures are required.

South Perimeter Wall

The PEIR concluded that the perimeter screening project would not impede or redirect flood flows. The modifications to the perimeter screening project involves construction of a new perimeter wall at approximately the same location, subject to the same stormwater regulations, and would not alter the conclusions in the PEIR. No new significant impacts will occur, and no new mitigation measures are required.

Once constructed, the new facility will protect the treatment plant from future wave run-up including a tsunami wave. The wall is designed to re-direct wave run up. OC San has conducted an assessment on the effect to neighboring land uses from the installation of the new wall and has concluded that most of the energy from the wave run up will be reflected back toward the ocean, and will not reflect laterally toward neighboring and uses. Therefore, the Project Modifications will not alter the impact analysis in the PEIR; impacts will be less than significant, and no new mitigation measures are required.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

TPAD Digester Facility

The PEIR describes in Section 3.8.3 that the project area is located adjacent to the Santa Ana River, the Pacific Ocean, and Talbert Marsh. The U.S. Army Corps of Engineers completed the flood protection walls and levees in 1995. The project area is located within the 500-year floodplain, or Zone X, "Reduced Risk Due to Levees" location. No closed bodies of water are located near the project area. The proposed Project Modifications will be located in the same location as the project evaluated in the PEIR. Therefore, the Project Modifications do not alter the conclusions in the PEIR that the project will not expose people or structures to a significant risk of loss, injury or death involving inundation by seiche compared with existing conditions.

South Perimeter Wall

The PEIR concluded that the perimeter screening project would not impede or redirect flood flows. The modifications to the perimeter screening project involves construction of a new perimeter wall. Construction activities will not alter the conclusions of the PEIR.

Once constructed, the new facility will protect the treatment plant from future wave run-up including a tsunami wave. The wall is designed to re-direct wave run up. OC San has conducted an assessment on the effect to neighboring land uses from the installation of the new wall and has concluded that most of the energy from the wave run up will be reflected back toward the ocean, and will not reflect laterally toward neighboring and uses. Therefore, the modifications will not alter the impact analysis in the PEIR; impacts will be less than significant, and no new mitigation measures are required.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

TPAD Digester Facility and South Perimeter Wall

The PEIR concludes that the TPAD facility and perimeter screening would not conflict with a water quality control plan or sustainable groundwater management plan. The proposed Project Modifications to the TPAD facility would be subject to the same regulations and management plans and therefore, will not alter this conclusion for either construction or operation. No new significant impacts will occur, and no new mitigation measures are required.

Summary of Potential Effects on Hydrology and Water Quality

The proposed modifications will not result in new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects, with respect to hydrology and water quality. No further environmental review is required. (Public Resources Code § 21166; CEQA Guidelines § 15162.)

Land Use and Planning

Issues (and Supporting Information Sources):		*Yes*	*No*
XI.	**LAND USE AND PLANNING —** Would project modifications, changed circumstances, or new information substantially increase the severity of significant impacts identified in the previous CEQA document or result in new significant impacts that could**:**		
a)	Physically divide an established community?	☐	☒
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?	☐	☒

Discussion

a) Physically divide an established community?

TPAD Digester Facility and South Perimeter Wall

The PEIR concludes that the construction of new treatment facilities within the existing treatment plant would not physically divide an established community. The proposed Project Modifications do not propose any action that could divide an established community. The physical division of an established community generally refers to the construction of a feature such as an interstate highway or railroad tracks, or removal of a means of access, such as a local road or bridge that will impact mobility within an existing community or between a community and outlying area. Given the proposed project will construct facilities in the existing OC San Plant No. 2 property, the proposed Project Modifications will not alter the conclusions of the PEIR, and no new mitigation measures are required.

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?

TPAD Digester Facility and South Perimeter Wall

The project site is located within the City of Huntington Beach's Coastal Zone and is subject to the Local Coastal Plan (LCP). Under the implementation program of the LCP, the project site is zoned for Industrial Limited (IL). The LCP and City of Huntington Beach General Plan Policy LU 13.18 requires the design and development to be compatible in scale, mass, character, and architecture with existing buildings and design characteristics prescribed by the General Plan. The PEIR provided an analysis of the BMP Master Plan consistency with the LCP finding all elements of the Program to be consistent with the goals and policies of the LCP.

The Project Modifications have refined the height of the Thermophilic Digesters to be approximately 40 feet tall with additional 10 feet of appurtenant equipment on the roofs, totaling approximately 50 feet in height measured from the highest point of the curb along the front property line (e.g., curb of sidewalk of Brookhurst Street). The PEIR described the TPAD facility with a 40-foot roof height. The LCP allows for 40 feet high roof levels with an additional 10 feet allowed for appurtenant equipment with an approved CUP. As a result, the modified TPAD facility will be consistent with the General Plan and LCP and will require a CUP and Coastal Development Permit (CDP) from the City of Huntington Beach, similar to the conclusions in the PEIR. No new significant impacts will occur, and no new mitigation measures are required.

The PEIR described the perimeter screening project to be consistent with the LCP. The Project Modifications include a new perimeter wall subject to a CUP and CDP from the City of Huntington Beach. The Project Modifications would not alter the conclusions of the PEIR. No new significant impacts will occur, and no new mitigation measures are required.

Summary of Potential Effects on Land Use

The proposed modifications will not result in new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects, with respect to land use. No further environmental review is required. (Public Resources Code § 21166; CEQA Guidelines § 15162.)

References

City of Huntington Beach (CHB), 2022a. Municipal Code. Available at: https://library.qcode.us/lib/huntington_beach_ca/pub/municipal_code/item/zoning_code-title_21-chapter_212-212_06, accessed on 28 July, 2022.

CHB, 2022b. Municipal Code Article III. Available at: https://library.qcode.us/lib/huntington_beach_ca/pub/municipal_code/item/zoning_code-title_23-chapter_230-article_iii-230_72, accessed on September 1, 2022.

Mineral Resources

Issues (and Supporting Information Sources):		*Yes*	*No*
XII.	**MINERAL RESOURCES —** Would project modifications, changed circumstances, or new information substantially increase the severity of significant impacts identified in the previous CEQA document or result in new significant impacts that could**:**		
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?	☐	☒
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?	☐	☒

Discussion

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?

TPAD Digester Facility and South Perimeter Wall

The PEIR notes that the project area is not within a mineral resource area and does not have a history of mineral extraction uses (CHB 2017). The State of California Department of Conservation, Division of Oil, Gas, and Geothermal Resources identify 18 abandoned oil wells on Plant No. 2. These wells are "plugged" and therefore are no longer active (DOC 2022). The PEIR concludes that construction of the TPAD facility would not interfere with known mineral resources. The Project Modifications would not change the location of the proposed project. As a result, the TPAD facility and perimeter wall as modified will not alter the conclusions in the PEIR. No new significant impacts will occur, and no new mitigation measures are required.

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?

TPAD Digester Facility and South Perimeter Wall

As noted in the PEIR, the TPAD facility and perimeter screening would not result in the loss of locally important mineral resource recovery site as delineated in a local general plan or specific plan. The proposed TPAD facility and perimeter wall as modified will occur within approximately the same footprint and would not alter the conclusions in the PEIR. No new significant impacts will occur, and no new mitigation measures are required.

Summary of Potential Effects on Mineral Resources

The proposed modifications will not result in new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects, with respect to mineral resources. No further environmental review is required. (Public Resources Code § 21166; CEQA Guidelines § 15162.)

References

California Department of Conservation (DOC), 2022. Well Finder. Available at: https://maps.conservation.ca.gov/doggr/wellfinder/#openModal/-117.95923/33.63871/15, accessed September 1, 2022.

City of Huntington Beach (CHB), 2017. Environmental Resources and Conservation. Available at: https://www.huntingtonbeachca.gov/files/users/planning/environmental_resources_conservation_element.pdf, accessed September 1, 2022.

Noise

Issues (and Supporting Information Sources):	*Yes*	*No*
XIII. NOISE — Would project modifications, changed circumstances, or new information substantially increase the severity of significant impacts identified in the previous CEQA document or result in new significant impacts that could**:**		
a) Generate 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?	☐	☒
b) Generate excessive groundborne vibration or groundborne noise levels?	☐	☒
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?	☐	☒

Discussion

a) Generate 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?

TPAD Digester Facility and South Perimeter Wall

The PEIR concluded that construction of the TPAD facility and perimeter screening would not result in significant noise impacts. The proposed Project Modifications will utilize similar construction methods and would not alter the conclusions of the PEIR. The introduction of the CDSM activities will require a concrete batch plant during construction. The concrete batch plant will require sand, gravel, and Portland cement deliveries to the site to produce the concrete. The material deliveries associated with the concrete batch plant under the Project Modifications will add 600 delivery truck trips on top of those accounted for in the PEIR. With the original 600 truck trips plus the baseline traffic volumes as the new base, these 600 new truck trips will result in less than 3 dBA increase in traffic noise along the access roads. Therefore, the project modifications will not generate substantial additional noise in any particular day from delivery truck trips, beyond what was evaluated in the PEIR. No new significant impacts will occur, and no new mitigation measures are required.

The concrete batch plant and bore/drill rig will be new sources of noise not considered in the PEIR. The batch plant and drill rig will generate noise levels of approximately 76 dBA and 78 dBA, respectively, at a reference distance of 50 feet and accounting for acoustical usage factors, which represents the average equipment usage in a typical hour.[3] At a distance of 120 feet, the noise levels will be reduced to approximately 68.4 dBA and 70.4 dBA, respectively. The combined noise level will be 72.5 dBA. When adding this to

[3] Based on the Federal Highway Administration Roadway Construction Noise Model.

the maximum noise level in the PEIR (i.e., 78 dBA), the noise level will be approximately 79 dBA. Similar to the project, the Project Modifications will comply with the allowable construction hours of the Huntington Beach Municipal Code (HBMC) as well as the construction hours identified in the Costa Mesa Municipal Code related to use of haul routes. Therefore, on-site and off-site construction noise will be less than significant and the project modifications will not result in substantial changes to noise, cause new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects, with respect to noise.

Operation of the Project Modifications will not result in substantial changes in the types of noise-generating equipment or processes compared to the project. As discussed above, the PEIR determined that operation of the project will generate a noise level of 34 dBA at the nearest noise sensitive uses along Brookhurst Street, which will not exceed the significance threshold of 61 dBA (the average nighttime ambient noise level as shown in Table 3.10-1 of the PEIR). The proposed project modifications will generate a similar noise level at the nearest noise sensitive uses along Brookhurst Street and will also not exceed the significance threshold. Therefore, on-site and off-site operational noise will be less than significant and the proposed project modifications will not result in substantial changes to noise, cause new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects, with respect to noise. This finding is consistent with the impact determination in the PEIR; no new significant impacts will occur, and no new mitigation measures are required.

b) Generate excessive groundborne vibration or groundborne noise levels?

TPAD Digester Facility and South Perimeter Wall

The PEIR concluded that construction would not result in significant groundborne vibration or noise. The Project Modifications will include a concrete batch plant and bore/drill rig, which will be new sources of vibration not considered in the PEIR. In addition, shoring will occur, with auger in soldier piles instead of sheeting that would be pressed/vibrated into place. As provided in Table 3.10-12 of the PEIR, vibration levels for loaded trucks that will be used to deliver concrete materials will be 0.076 in/sec PPV at a reference distance of 25 feet. Vibration levels for a bore/drill rig will be 0.089 in/sec PPV at a reference distance of 25 feet. These vibration levels will be less than the maximum vibration level considered in the PEIR for impact pile driving of 0.644 in/sec at a reference distance of 25 feet. Therefore, the project modifications will not generate vibration levels in excess of that analyzed in the PEIR. Therefore, construction of the modifications will have a less than significant vibration impact on the nearest vibration-sensitive receptors. This finding is consistent with the impact determination in the PEIR; no new significant impacts will occur, and no new mitigation measures are required.

The PEIR concluded that operation would not result in significant vibration or groundborne noise. Similar to the project, the project modifications will include the operation of typical commercial-grade stationary mechanical and electrical equipment,

such as pumps and exhaust fans, which will produce vibration up to 0.006 in/sec PPV at the residences along Brookhurst Street west of Plant No. 2. Operation of the project modifications will not exceed the 0.5 in/sec PPV threshold for building damage and 0.04 in/sec PPV threshold for human annoyance. Therefore, operation will have a less than significant vibration impact on the nearest vibration-sensitive receptors. This finding is consistent with the impact determination in the PEIR; no new significant impacts will occur, and no new mitigation measures are required.

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?

TPAD Digester Facility and South Perimeter Wall

The TPAD facility and perimeter wall will be located in the same location evaluated in the PEIR and will not be located within an airport land use plan or within 2 miles of a public airport or public use airport. No new significant impacts will occur, and no new mitigation measures are required.

Summary of Potential Effects on Noise

The proposed modifications will not result in new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects, with respect to noise. No further environmental review is required. (Public Resources Code § 21166; CEQA Guidelines § 15162.)

References

California Department of Transportation (Caltrans). 2013a. Technical Noise Supplement (TeNS). September, 2013.

Caltrans. 2013b. Transportation and Construction Vibration Guidance Manual. September 2013.

City of Fountain Valley. 1995. General Plan Noise Element.

City of Fountain Valley. 2017. Municipal Code, Section 6.28.

City of Huntington Beach. 1995. General Plan Noise Element.

City of Huntington Beach. 2017. Municipal Code, Section 8.40.

Federal Highway Administration (FHWA). 2006. Roadway Construction Noise Model User's Guide.

Federal Transit Administration (FTA). 2006. Transit Noise and Vibration Impact Assessment, May 2006.

Occupation Safety and Health Administration (OSHA). 2017. Occupational Safety and Health Standards, Part 1910.95. Available at:

https://www.osha.gov/pls/oshaweb/owadisp.show_document?p_table=standards&p_id=9735, accessed on September 29, 2017.

United States Environmental Protection Agency (USEPA). 1974. EPA Identifies Noise Levels Affecting Health and Welfare. April 1974.

Population and Housing

Issues (and Supporting Information Sources):	*Yes*	*No*
XIV. POPULATION AND HOUSING — Would project modifications, changed circumstances, or new information substantially increase the severity of significant impacts identified in the previous CEQA document or result in new significant impacts that could**:**		
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)?	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☒

Discussion

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)?

TPAD Digester Facility and South Perimeter Wall

The PEIR concluded that the BMP Master Plan would not induce population growth directly or indirectly. The proposed Project Modifications would not increase capacity of the treatment plant or accommodate unplanned growth. The Project Modifications will not alter the conclusion sin the PEIR. No new significant impacts will occur, and no new mitigation measures are required.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

TPAD Digester Facility and South Perimeter Wall

The PEIR concluded that the BMP Master Plan would not displace people or housing. The Proposed Modifications will occur within the same footprint and will not remove housing or displace people, necessitating the construction of replacement housing elsewhere. Therefore, no new significant impacts will occur, and no new mitigation measures are required.

Summary of Potential Effects on Population and Housing

The proposed modifications will not result in new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects, with respect to

population and housing. No further environmental review is required. (Public Resources Code § 21166; CEQA Guidelines § 15162.)

Public Services

Issues (and Supporting Information Sources):		*Yes*	*No*
XV. PUBLIC SERVICES —			
a)	Would project modifications, changed circumstances, or new information substantially increase the severity of significant impacts identified in the previous CEQA document or result in new significant impacts due to changed circumstances or new information for any of the following public services:		
	i) Fire protection?	☐	☒
	ii) Police protection?	☐	☒
	iii) Schools?	☐	☒
	iv) Parks?	☐	☒
	v) Other public facilities?	☐	☒

Discussion

a.i, ii, iii, iv, v) Fire Protection, Police Protection, Schools, Parks, Other Public Facilities

TPAD Digester Facility and South Perimeter Wall

The PEIR evaluated the project's effect on fire, police, schools, parks and other facilities. The Huntington Beach Fire Department (HBFD) provides fire protection within the City (CHB 2022a). The nearest station to the project area is Station 4 located approximately 1 mile northwest at 21441 Magnolia Street. The City of Huntington Beach is provided with police protection services by the Huntington Beach Police Department (HBFD) (CHB 2022b). The police station is located 3.5 miles northwest of the project area at 2000 Main Street. The project area lies within the Huntington Beach Union High School District (HBUHSD) service area (HBUHSD 2022).

The PEIR concluded that the TPAD facility and perimeter screening project would not change existing demand for fire protection services, police services, schools, parks, or other public facilities, since the project will not result in a substantial increase in employees or population. Therefore, the proposed Project Modifications will not substantially increase the need for new fire department staff or new facilities, and because no new facilities will be required, no construction impacts due to new facilities will occur. No new significant impacts will occur, and no new mitigation measures are required.

Summary of Potential Effects on Public Services

The proposed modifications will not result in new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects, with respect to

public services. No further environmental review is required. (Public Resources Code § 21166; CEQA Guidelines § 15162.)

References

City of Huntington Beach (CHB), 2022a. Fire Department. Available at: http://www.huntingtonbeachca.gov/government/departments/fire/, accessed September 1, 2022.

CHB, 2022b. Police Department. Available at: http://www.huntingtonbeachca.gov/government/departments/pd/, accessed September 1, 2022.

Huntington Beach Union High School District (HBUHSD), 2022. Huntington Beach Union High School District. Available at: http://www.hbuhsd.edu/, accessed September 1, 2022.

Recreation

Issues (and Supporting Information Sources):		*Yes*	*No*
XVI.	**RECREATION —** Would project modifications, changed circumstances, or new information substantially increase the severity of significant impacts identified in the previous CEQA document or result in new significant impacts that could:		
a)	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?	☐	☒
b)	Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☒

Discussion

a) 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?

TPAD Digester Facility

The PEIR identifies that the City of Huntington Beach maintains the parks and provides recreational services. The nearest recreational facility is the Santa Ana River Trail and Talbert Marsh bike path located adjacent to Plant No. 2. The PEIR concludes that the TPAD facility would not affect recreation areas in the city. The modifications to the TPAD facility will not alter this conclusion. No new significant impacts will occur, and no new mitigation measures are required.

South Perimeter Wall

The PEIR concludes that the perimeter screening project would not result in substantial deterioration to neighborhood or regional parks. The new perimeter wall will occur

adjacent to the Talbert Marsh, but will not encroach within the marsh itself. Construction of the south perimeter wall will require the temporarily closing the Talbert Marsh bike path. During the temporary closure of the Talbert Marsh bike path, a bike path detour plan will be developed and posted at the either side of the Talbert Marsh bike path. As shown on Figure 6, the bike path detour will use the sidewalk along the Brookhurst Street bridge crossing the intersection of Brookhurst Street and Pacific Coast Highway and connecting to the Huntington Beach bike trail. Recreational users using the Santa Ana River Trail will also be detoured south past the Talbert Marsh bike path under the Pacific Coast Highway to the Huntington Beach bike path. The duration of the closure will be determined during construction and may last two to six weeks, which may or may not be continuous. Other shorter duration closures may also be required during construction activities. However, the temporary bike path closure will not necessitate construction of a new path. Impacts to recreational uses within the area will be less than significant. No new significant impacts will occur, and no new mitigation measures are required.

b) Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

TPAD Digester Facility and South Perimeter Wall

The TPAD Digester Facility will be constructed within the existing Plant No. 2 and will not impact recreational facilities. The TPAD facility as modified will not alter the conclusions in the PEIR.

The new perimeter wall will temporarily affect the bike path and after construction will restore the two six-foot wide travel lanes. The modification to the recreational bike path will not have an adverse physical impact on the environment. As described in the biological resources section of this document, the construction activities will avoid impacts to wetlands and other sensitive habitat. The plant boundary will remain similar to existing conditions, remaining 25 feet from the edge of the Talbert Marsh. As a result, the temporary impacts to the bike path will not adversely affect environmental resources. No new significant impacts will occur, and no new mitigation measures are required.

Summary of Potential Effects on Recreation

The proposed modifications will not result in new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects, with respect to recreation. No further environmental review is required. (Public Resources Code § 21166; CEQA Guidelines § 15162.)

Transportation

Issues (and Supporting Information Sources):	*Yes*	*No*
XVII. TRANSPORTATION — Would project modifications, changed circumstances, or new information substantially increase the severity of significant impacts identified in the previous CEQA document or result in new significant impacts that could**:**		
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☒
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☒
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☒
d) Result in inadequate emergency access?	☐	☒

Discussion

a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

TPAD Digester Facility

The PEIR concludes that the TPAD facilities would not conflict with plans or policies addressing the circulation system. During construction access to Plant No. 2 will primarily utilize I-405 Freeway to Brookhurst Street and SR-55 to Victoria Street/Hamilton Avenue and to Brookhurst Street. Construction traffic will utilize either entrance on Brookhurst Street to access Plant No. 2. No detours or road closures are anticipated as a result of the proposed construction activities.

The Project Modifications would not alter this conclusion. Construction truck and vehicle trips will be generated primarily by construction workers commuting to and from the work sites, and by trucks hauling materials and equipment to and from the pipeline alignments.

Once constructed, the proposed Project Modifications will not increase truck and vehicle trips within Huntington Beach and the regional circulation system The modifications will not alter the conclusions of the PEIR. No new significant impacts will occur, and no new mitigation measures are required.

South Perimeter Wall

The PEIR evaluated a perimeter screening project. The modifications to this project include construction of a perimeter wall. Construction of the wall system will require construction beyond OC San's property line. This will require the Talbert Marsh bike path to be temporarily narrowed to 6 feet wide during construction for approximately 1,000 feet and will require temporary closures lasting approximately two to six weeks. During the temporary closure of the Talbert Marsh bike path, a bike path detour plan will be developed and posted at the either side of the Talbert Marsh bike path. As shown on

Figure 6, the bike path detour will use the sidewalk along the Brookhurst Street bridge crossing the intersection of Brookhurst Street and Pacific Coast Highway and connecting to the Huntington Beach bike trail. Recreational users using the Santa Ana River Trail will also be detoured south past the Talbert Marsh bike path under the Pacific Coast Highway to the Huntington Beach bike path. East of the construction zone the path will return to dual 6-foot wide lanes. Construction of the perimeter wall would not require the closure or modification of any other transportation paths in or around the project site.

Once constructed, the bike path will be returned to its current functionality. The modifications to the perimeter screening will not alter the conclusions of the PEIR during construction.

b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

TPAD Digester Facility

The PEIR identified that construction truck and vehicle trips will be generated primarily by construction workers commuting to and from the work sites, and by trucks hauling materials and equipment to and from the pipeline alignments. The PEIR estimated construction trips in Table 2-15 at 88,990 trips per year with a VMT of 1,779,808. Construction of the modified TPAD facility would require a concrete batch plant to support CDSM construction methods. The construction methods will add 600 delivery truck trips on top of those accounted for in the PEIR. Although daily truck trips will increase, the VMT during construction will increase by 1,200 miles annually which is less than 0.07 percent of the total annual VMT estimated in the PEIR. Therefore, the proposed modifications will not alter the conclusions of the PEIR with respect to VMT.

Once constructed the proposed Project Modifications will result in minimal operational traffic compared with the assumptions in the PEIR. Since the project modifications are neither a traffic-generating land use nor a transportation project, and will generate very few operational trips, the project as modified will have a less-than-significant impact with respect to VMT. This is consistent with the conclusions in the PEIR.

South Perimeter Wall

The PEIR evaluated a perimeter screening project. The modifications to this project include construction of a perimeter wall that will increase vehicle deliveries, resulting in an increase of 1,200 miles annually. As described for the TPAD facility, this will increase VMT by 1,200 miles annually which is less than 0.07 percent of the total annual VMT estimated in the PEIR. Therefore, the proposed modifications will not alter the conclusions of the PEIR with respect to VMT.

Once constructed the new perimeter wall will not induce any new traffic. Operation of the new perimeter wall will not alter the conclusions of the PEIR.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

TPAD Digester Facility

As described in the PEIR, the TPAD facility will be located entirely within the treatment plant. As a result, the TPAD facility as modified will not increase hazards due to geometric design feature during operation or construction. The modified project will not alter the conclusions of the PEIR. No new significant impacts will occur, and no new mitigation measures are required.

South Perimeter Wall

The PEIR evaluated a perimeter screening project. The modifications to this project include construction of a perimeter wall that will modify the bike path slightly. As previously mentioned, construction of the perimeter wall will temporarily alter the bike path that is adjacent to the southern region of the plant. During construction the bike path may be temporarily closed. A detour route will be provided as shown in Figure 6.

Once constructed, the bike path will be restored to its pre-construction conditions once construction is complete. Operation for the perimeter wall will not alter the physical configuration of an existing roadway network serving the project area, and will not introduce unsafe design features. The modification to the perimeter screening will not alter the conclusions of the PEIR during construction or operation.

d) Result in inadequate emergency access?

TPAD Digester Facility

The PEIR describes in Section 3.11.3 (p.3.11-13) that construction trucks and employee vehicles will interact with other vehicles on project area roadways, including emergency vehicles, but will not alter the physical configuration of the existing roadway network serving the area in a manner that could affect emergency access. Operation and construction of the TPAD facility as modified will not substantially increase daily traffic or affect roadways or lanes that could impede emergency access. As a result, the Project Modifications would not alter the conclusions of the PEIR. No new significant impacts will occur, and no new mitigation measures are required.

South Perimeter Wall

The PEIR evaluated a perimeter screening project. The modifications to this project include construction of a perimeter wall. Construction of the wall system will require construction beyond OC San's property line, but will not encroach on existing roadway networks serving the area or alter the physical configuration of the existing roadway network serving the area in a manner that could affect emergency access. The

modifications to the existing perimeter screening will not alter the conclusions of the PEIR during construction or operation.

Summary of Potential Effects on Transportation

The proposed modifications will not result in new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects, with respect to transportation. No further environmental review is required. (Public Resources Code § 21166; CEQA Guidelines § 15162.)

Tribal Cultural Resources

Issues (and Supporting Information Sources):	*Yes*	*No*
XVIII. TRIBAL CULTURAL RESOURCES — Would project modifications, changed circumstances, or new information substantially increase the severity of significant impacts identified in the previous CEQA document or result in new significant impacts that could:		
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), or	☐	☒
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.	☐	☒

Discussion

a.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)

TPAD Digester Facility and South Perimeter Wall

The PEIR concluded on page 3.12-6 that no known tribal cultural resources have been identified within the treatment plant or construction area. The proposed project modifications will be implemented within Plant No. 2 in the same location evaluated in the PEIR. Therefore, no new significant impacts will occur, and no new mitigation measures are required.

a.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.

TPAD Digester Facility and South Perimeter Wall

The PEIR concluded that there are currently no known resources that will be considered significant pursuant to subdivision (c) of Public Resources Code Section 5024.1 within the project area. The proposed project modifications will be implemented within Plant No. 2 and along the southern edge of the property, consistent with the area evaluated in the PEIR. No new significant impacts will occur, and no new mitigation measures are required.

Summary of Potential Effects on Tribal Cultural Resources

The proposed modifications will not result in new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects, with respect to tribal resources. No further environmental review is required. (Public Resources Code § 21166; CEQA Guidelines § 15162.)

Utilities and Service Systems

Issues (and Supporting Information Sources):		*Yes*	*No*
XIX.	**UTILITIES AND SERVICE SYSTEMS —** Would project modifications, changed circumstances, or new information substantially increase the severity of significant impacts identified in the previous CEQA document or result in new significant impacts that could**:**		
a)	Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☒
b)	Have insufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☒
c)	Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☒
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?	☐	☒
e)	Fail to comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☒

Discussion

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

TPAD Digester Facility and South Perimeter Wall

The PEIR concluded that the proposed project will upgrade an existing wastewater treatment plant. The project will not require additional water, wastewater, electricity, natural gas, or telecommunication facilities. The Project Modifications include new equipment and structures, but will not alter the conclusions in the PEIR. No new significant impacts will occur, and no new mitigation measures are required.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

TPAD Digester Facility and South Perimeter Wall

The PEIR concluded that the project will not increase water demands. The Project Modifications include new equipment and structures, but will not increase water demands or alter the conclusions in the PEIR. No new significant impacts will occur, and no new mitigation measures are required.

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?

TPAD Digester Facility and South Perimeter Wall

The PEIR concluded that TPAD facility will not exceed wastewater treatment provider capacity. The Project Modifications do not alter this conclusion. Therefore, there will be no new significant impacts and no new mitigation measures are required. This finding is consistent with the impact determination in the PEIR; no new significant impacts will occur, and no new mitigation measures are required.

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?

TPAD Digester Facility

The PEIR notes on page 2-26 that and the TPAD facility will require 121,000 cubic yards that will be exported and 8,000 cubic yards that will be imported. The PEIR notes on p. 3.13-6 that the project will be subject to the Integrated Waste Management Act of 1989 (Public Resources Code [PRC] 40050 et seq. or Assembly Bill [AB] 939), administered by CalRecycle that requires all local and county governments to reduce the amount of solid waste sent to landfills. As modified, the TPAD facility will require less off-site hauling (approximately 97,200 cubic yards) Therefore, construction of the proposed project will not increase the generation of solid waste beyond what was analyzed in the PEIR.

Once constructed, the new TPAD facility will produce biosolids as described in the PEIR. The modifications will not alter the conclusions in the PEIR; no new significant impacts will occur, and no new mitigation measures are required.

South Perimeter Wall

The perimeter wall will not require hauling soils offsite. Therefore, construction of the proposed project will not increase the generation of solid waste beyond what was analyzed in the PEIR.

Once constructed, the new perimeter wall will not generate solid waste. The modifications will not alter the conclusions in the PEIR; no new significant impacts will occur, and no new mitigation measures are required.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

TPAD Digester Facility

The PEIR notes on p. 3.13-6 that the project will be subject to the Integrated Waste Management Act of 1989 (Public Resources Code [PRC] 40050 et seq. or Assembly Bill [AB] 939), administered by CalRecycle that requires all local and county governments to reduce the amount of solid waste sent to landfills. As modified, the TPAD facility will require less off-site hauling. Therefore, construction of the proposed project will not increase the generation of solid waste beyond what was analyzed in the PEIR.

Once constructed, the new TPAD facility will produce biosolids as described in the PEIR. The modifications will not alter the conclusions in the PEIR; no new significant impacts will occur, and no new mitigation measures are required.

South Perimeter Wall

The perimeter wall will not require hauling soils offsite. Therefore, construction of the proposed project will not increase the generation of solid waste beyond what was analyzed in the PEIR.

Once constructed, the new perimeter wall will not generate solid waste. The modifications will not alter the conclusions in the PEIR; no new significant impacts will occur, and no new mitigation measures are required.

Summary of Potential Effects on Utilities and Service Systems

The proposed modifications will not result in new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects, with respect to utilities and service systems. No further environmental review is required. (Public Resources Code § 21166; CEQA Guidelines § 15162.)

Wildfire

Issues (and Supporting Information Sources):		*Yes*	*No*
XX.	**WILDFIRE —** Would project modifications, changed circumstances, or new information substantially increase the severity of significant impacts identified in the previous CEQA document or result in new significant impacts that could**:**		
a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☒
b)	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?	☐	☒
c)	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?	☐	☒

Issues (and Supporting Information Sources):	*Yes*	*No*
d) 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?	☐	☒

Discussion

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

TPAD Digester Facility and South Perimeter Wall

The PEIR described that the treatment plant is located in an urbanized area that is not located within or near an area designated as a State Responsibility Area or an area classified as a Very High Fire Hazard Severity Zone according to the California Department of Forestry and Fire Protection (CAL Fire 2022). The proposed Project Modifications will not change the location of the TPAD facility or perimeter boundary. Therefore, there will be no new significant impacts will occur, and no new mitigation measures are required.

b) 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?

TPAD Digester Facility and South Perimeter Wall

The PEIR described that the treatment plant is located in an urbanized area that is not located within or near an area designated as a State Responsibility Area or an area classified as a Very High Fire Hazard Severity Zone according to the California Department of Forestry and Fire Protection (CAL Fire 2022). The proposed Project Modifications will not change the location of the TPAD facility or plant boundary, or exacerbate risks or wildfire. Therefore, there will be no new significant impacts will occur, and no new mitigation measures are required.

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?

TPAD Digester Facility and South Perimeter Wall

The PEIR described that the treatment plant is located in an urbanized area that is not located within or near an area designated as a State Responsibility Area or an area classified as a Very High Fire Hazard Severity Zone according to the California Department of Forestry and Fire Protection (CAL Fire 2022). The proposed Project Modifications will not change the location of the TPAD facility or perimeter boundary, or require installation of infrastructure that may exacerbate wildfire. Therefore, there will be no new significant impacts will occur, and no new mitigation measures are required.

Summary of Potential Effects on Wildfire

The proposed modifications will not result in new significant environmental effects, or result in a substantial increase in the severity of previously identified significant effects, with respect to wildfire. No further environmental review is required. (Public Resources Code § 21166; CEQA Guidelines § 15162.)

References

California Department of Forestry and Fire Protection (CAL FIRE). 2022. Fire Hazard Severity Zone Viewer. Available at: https://egis.fire.ca.gov/FHSZ/. Accessed July 20, 2022.

Mandatory Findings of Significance

Issues (and Supporting Information Sources):		*Yes*	*No*
XXI. MANDATORY FINDINGS OF SIGNIFICANCE —			
a)	Does the Project Modification have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒
b)	Does the Project Modification have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☒
c)	Does the Project Modification have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒

Discussion

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

TPAD Digester Facility and South Perimeter Wall

The PEIR concluded that the BMP Master Plan would not have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. The Project

Modifications would occur within the same approximate footprint as the project evaluated in the PEIR and would not encroach onto areas that could support ecological or historical resources not already described in the PEIR. As a result, the Project Modifications would not alter the conclusions of the PEIR.

b) Does the project have impacts that are individually limited, but cumulatively considerable?

TPAD Digester Facility and South Perimeter Wall

The PEIR identified the BMP Master Plans contribution to cumulative impacts for all resource topics and concluded that cumulative impacts would be less than significant. The Project Modifications refine the TPAD facility and perimeter screening designs, but would not increase impacts substantially (as described in this Addendum) that could result in cumulatively considerable contributions significant impacts.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

TPAD Digester Facility and South Perimeter Wall

The PEIR concluded that the BMP Master Plan would not result in impacts that could cause substantial adverse effects on human beings, either directly or indirectly. The Project Modifications refine the TPAD facility and perimeter screening designs, but would not increase impacts substantially (as described in this Addendum) that could adversely affect human beings not already described in the PEIR.

Summary

As described in this Addendum, impacts to the environment as a result of the project modifications will not result in new significant environmental effects or a substantial increase in the severity of previously identified significant effects. No new information of substantial importance indicates the project as modified will have one or more significant effects not discussed in the previous PEIR, nor are significant effects previously examined substantially more severe than described in the previous PEIR. No new mitigation will be required as a result of implementing the project modifications. Pursuant to *CEQA Guidelines* Sections 15162 and 15164 and the project modifications findings described herein, the proposed modifications to the project do not require preparation of a Subsequent or Supplemental EIR.