

COASTAL CONSERVANCY

Staff Recommendation
May 27, 2021

TIJUANA RIVER VALLEY – SMUGGLER’S GULCH IMPROVEMENTS

Project No. 21-010-01
Project Manager: Sam Jenniches

RECOMMENDED ACTION: Authorization to disburse up to \$10,000,000 to the County of San Diego to implement the Tijuana River Valley – Smuggler’s Gulch Improvements Project, and adoption of findings under the California Environmental Quality Act.

LOCATION: Tijuana River Valley Regional Park, County of San Diego

EXHIBITS

- Exhibit 1: [Project Maps](#)
- Exhibit 2: [Project Photos](#)
- Exhibit 3: [Project Letters](#)
- Exhibit 4: [Addendum to the Initial Study/Mitigated Negative Declaration April 2021 for the Regional General Permit 53 Project](#)

RESOLUTION AND FINDINGS

Staff recommends that the State Coastal Conservancy adopt the following resolution and findings.

Resolution:

The State Coastal Conservancy hereby authorizes a grant of an amount not to exceed ten million dollars (\$10,000,000) to the County of San Diego (“the grantee”) to implement the Tijuana River Valley – Smuggler’s Gulch Improvements Project in Tijuana River Valley Regional Park in the County of San Diego.

Prior to commencement of the project, the grantee shall submit for the review and written approval of the Executive Officer of the Conservancy (Executive Officer) the following:

1. A detailed work program, schedule, and budget.
2. Names and qualifications of any contractors to be retained in carrying out the project.
3. A plan for acknowledgement of Conservancy funding.

4. Evidence that all permits and approvals required to implement the project have been obtained.
5. A written agreement with the City of San Diego sufficient to enable the grantee to implement, operate, and maintain the portion of the project located on property owned by the City of San Diego.

Findings:

Based on the accompanying staff recommendation and attached exhibits, the State Coastal Conservancy hereby finds that:

1. The proposed authorization is consistent with Chapters 3 and 5.5 of Division 21 of the Public Resources Code, regarding funding a project identified by the Tijuana River Valley Needs and Opportunities Assessment and integrated coastal and marine resources protection, respectively.
2. The proposed project is consistent with the current Conservancy Project Selection Criteria and Guidelines.
3. The Conservancy has independently reviewed and considered the Regional General Permit (RGP) 53 Project Initial Study/Mitigated Negative Declaration (IS/MND) adopted on May 28, 1998, by the County Board of Supervisors and the Addendum to the Initial Study/Mitigated Negative Declaration April 2021 for the Regional General Permit 53 Project adopted by the County Board of Supervisors on April 23, 2021 pursuant to the California Environmental Quality Act (“CEQA”) and attached to the accompanying staff recommendation as Exhibit 4. The Conservancy finds that the proposed project as designed and mitigated avoids, reduces, or mitigates the potentially significant environmental effects to a less-than-significant level, and that there is no substantial evidence based on the record as a whole that the project may have a significant effect on the environment, as defined in 14 Cal. Code Regulations Section 15382.

STAFF RECOMMENDATION

PROJECT SUMMARY:

Staff recommends the Conservancy authorize a \$10,000,000 grant to the County of San Diego for implementation of the Tijuana River Valley – Smuggler’s Gulch Improvements Project (proposed project) in Tijuana River Valley Regional Park in San Diego County. The proposed project consists of installing a permanent sediment basin and trash booms in a tributary to the Tijuana River, and improving an existing culvert under Monument Road. The proposed project includes preparation of permit applications and final designs. The proposed project will reduce the movement of trash and sediment into the Tijuana River Valley (TRV) as well as reduce localized flooding at Monument Road.

Despite various efforts over the last several decades, the Tijuana River and canyon tributaries such as Smuggler’s Gulch remain some of the most polluted waterways in the San Diego region. Dry-weather flows from the Tijuana River are typically treated by the International Boundary and Water Commission’s (IBWC)’s existing diversion system, but following rain events, transboundary flows containing sewage, trash, and excessive amounts of sediment often exceed the diversion system’s capacity and reach the Tijuana River untreated. This can happen at any time of the year. Polluted flows from the Tijuana River threaten the health of residents in the U.S. and Mexico, impact important estuarine habitat and waters of international significance, cause beach closures, damage agricultural resources, adversely impact the economy, compromise border security operations, and have the potential to affect U.S. military readiness as there are military training installations within the impacted area.

Section 303(d) of the federal Clean Water Act requires that states identify impaired water bodies on the Clean Water Act Section 303(d) List of Water Quality Limited Segments (303(d) List). The State of California has identified the lower Tijuana River, the Tijuana River Estuary, and the downstream Pacific Ocean shoreline as impaired on the 303(d) List. Twenty pollutants, including indicator bacteria (primarily from sewage), sediment, and trash, are included on the 303(d) List for causing impairments to these water bodies and their designated beneficial uses.

In 2009, the San Diego Regional Water Quality Control Board formed the Tijuana River Valley Recovery Team to identify measures to be implemented in Mexico and the U.S. to reduce flows, intercept/divert wastes, and restore damaged habitats. The resulting Tijuana River Valley Recovery Strategy: Living with the Water (Recovery Strategy) identified several potential projects that could be implemented to address water quality impairment issues. In March 2020, the County of San Diego (County) completed the Tijuana River Valley Needs and Opportunities Assessment (NOA) Report to provide decision makers with project options that could be implemented within the U.S. to protect human and environmental health by controlling transboundary flows of sewage, trash, and sediment entering the Tijuana River Valley. The Smuggler’s Gulch Improvements project is identified as a priority in the NOA Report and was endorsed and identified as one of the top three priorities by the San Diego Regional Water Quality Control Board, City of San Diego, County of San Diego, City of Imperial Beach, City of Chula Vista, City of National City, Port of San Diego, Surfrider Foundation, and California State Lands Commission in the San Diego Regional Water Quality Control Board’s joint Resolution R9-2019-0246, adopted December 11, 2019.

Smuggler’s Gulch is a small tributary creek that flows from Tijuana, across the border, through land owned and operated by the County. This creek carries untreated sewage, trash, and excessive amounts of sediment that ultimately discharge into the Tijuana River without treatment. These conditions also create localized flooding at Monument Rd where existing culverts are unable to reliably pass trash and sediment and become blocked. Temporary remediation efforts are ongoing to address issues related to the transboundary flows, however, permanent solutions are needed. Currently, the County dredges Smuggler’s Gulch upstream of Monument Road approximately once a year and removes an average of 15,000 cubic yards of trash and accumulated sediment per dredging event. The City of San Diego also regularly dredges the channel downstream of Monument Road. The County’s and City’s dredging efforts are not long-term solutions because the area can quickly fill with sediment and trash after a

single large rain event. Moreover, these dredging efforts occur in sensitive habitats and require Clean Water Act Section 401/404 Permits that limit dredging activities to occur from September-November to avoid impacts to threatened and endangered species like the least Bell’s vireo. There are also temporary trash booms currently installed within Smuggler’s Gulch that have proven effective at capturing trash. However, these trash booms were not designed for permanent installation and do not control sediment.

Despite the current efforts to capture sediment and trash, there is still chronic flooding in the area where Smuggler’s Gulch crosses Monument Road, which impacts public health and safety. As such, there is a need to install permanent infrastructure to provide sediment and trash capture functions. Installing a maintained sedimentation basin at this location will provide an additional opportunity to capture and divert flows of sewage contaminated waters during the dry season that may not be captured within the existing IBWC diversion system.

The proposed project, consisting of a permanent sediment basin and trash booms, will provide an effective long-term solution that will, as long as it is routinely maintained, remove sediment and trash from the system so that these materials are not deposited in sensitive downstream areas such as the Tijuana River Estuary. The project will also reduce localized flooding by improving an existing culvert under Monument Road and reducing the amount of time that Monument Road is impassable. This will provide more reliable access to several recreational opportunities to the west including trails, sightseeing, a campground, and Border Field State Park. Surrounding communities, many of which are identified as disadvantaged communities or severely disadvantaged communities are directly impacted by issues related to flooding and excessive sedimentation and trash within the Tijuana River Valley.

The project includes the following:

- Preliminary Design and Alternative Selection
- Public Engagement
- Development of 30%, 60%, 90%, and 100% Design Plans
- All Necessary Draft and Final Regulatory Permits
- Development of an Operations and Maintenance Plan
- Construction of the project

The environmental analysis for the project has been completed with the County’s own funding and resulted in the County’s adoption of an Addendum to the County’s existing CEQA document for dredging activities.

The grantee will conduct stakeholder engagement at various levels throughout planning and implementation of the proposed project. Engagement will include attending and presenting on the proposed project during regular meetings of local stakeholders such as the Tijuana River Valley Recovery Team and Steering Committee, the United States International Boundary and Water Commission Citizens Forum, and the Tijuana River National Estuarine Research Reserve Advisory Council. Stakeholder engagement will also include direct outreach to nearby property owners (private and public) throughout planning and implementation of project.

Following construction of the sediment basin and trash booms, the grantee will perform maintenance as needed to ensure the continued operation of the facilities.

The Budget Act of 2019 (Assembly Bill 74, Ting, 2019) allocated \$15 million dollars of Proposition 68 funds to the Conservancy for the Tijuana Border Pollution Control Project. Subsequently, Senate Bill 690 (Hueso, 2019) added Section 31111.3 to the Public Resources Code to further guide the expenditure of these funds by stating, “When granting funds appropriated by Assembly Bill 74 (Chapter 23 of the Statutes of 2019 [the Budget Act of 2019]) for purposes of addressing transboundary flows and pollution in the Tijuana River Valley, the conservancy [sic] is encouraged to prioritize those projects identified in the studies described in subdivision (b) of Section 5907.5, to the extent feasible.” Section 5907.5 states that the County of San Diego shall, among other things, conduct “A study focused on the improvement and protection of natural lands, including the main river channel, in the Tijuana River Valley.” The proposed project is identified in the County’s Needs and Opportunities Assessment (2020), which was written per Section 5907.5 of the Public Resources Code.

Site Description: The TRV is a broad natural floodplain containing a variety of wetland and riparian areas. It is a small portion of the Tijuana River’s 1,700 square mile watershed. The watershed area includes portions of southern San Diego County and northern Baja California, Mexico. Adjacent the coast is the largest, intact and publicly-protected coastal wetland in the Southern California Bight, designated by RAMSAR as a “wetland of international importance,” and largely contained within the Tijuana River National Estuarine Research Reserve. The valley is bounded on the south by high mesas and deep canyons covered by chaparral, sage scrub and grasslands culminating with the Border Wall at the U.S. – Mexico Border. Multiple tributary canyons enter the TRV from Mexico. The valley floodplain currently contains a mixture of agricultural fields, equestrian facilities, rural housing, riparian woodland and disturbed habitats. Sand mining and agriculture, which were significant activities in the past, have declined. Historically, the TRV has been significantly impacted by development in the greater Tijuana metropolitan area of Baja California, Mexico. Unchecked development and insufficient infrastructure introduces sources of sediment and pollution across the border into California.

Smuggler’s Gulch is a tributary of the Tijuana River that flows as Matadero Canyon through urbanized developments in Tijuana, Mexico before crossing the border and draining into the Tijuana River Valley. The proposed project site is located just downstream of where the channel enters the United States. The channel then flows under Monument Road and joins the mainstem of the Tijuana River, which ultimately discharges into the Pacific Ocean through the Tijuana River Estuary. After flowing through urbanized areas, the channel regularly contains trash, sewage, and sediment. The entire project area for the sedimentation basins and trash booms is within County property. The culvert under Monument Road is owned by the City.

Grant Applicant Qualifications: The County of San Diego’s Department of Parks and Recreation maintains and enhances the quality of life in San Diego County by providing parks and recreational opportunities for residents and visitors. Their award-winning parks system includes local and regional parks, campgrounds, 300 miles of trails, fishing lakes, state-of-the-art recreation centers and sports complexes, ecological preserves, and open space preserves. This

park system is the legacy of many successful individual projects implemented through collaboration with local, state and federal partners. The County is uniquely qualified to undertake this project as the agency with jurisdiction over the TRVRP, and a history of completing complex within their parks system. The County has successfully managed grants from the Conservancy and other state agencies in the past, as described below.

CONSISTENCY WITH CONSERVANCY’S PROJECT SELECTION CRITERIA & GUIDELINES:

The proposed project is consistent with the Conservancy’s Project Selection Criteria and Guidelines, last updated on October 2, 2014, in the following respects:

Required Criteria

1. **Promotion of the Conservancy’s statutory programs and purposes:** See the “Consistency with Conservancy’s Enabling Legislation” section below.
2. **Consistency with purposes of the funding source:** See the “Project Financing” section below.
3. **Promotion and implementation of state plans and policies:**

California @ 50 Million:

The project is consistent with the Steward and Protect Natural and Working Landscapes Objective 6: Build resilience into natural systems and prioritize natural and green infrastructure solutions. The project will construct sedimentation and trash capture structures at Smuggler’s Gulch which will reduce flood risks due to enhanced streamflow in the Tijuana River Valley allowing this landscape to gain resilience to the effects of climate change.

California Climate Adaptation Strategy:

The proposed project is consistent with Strategy 4: Practice and Promote Integrated Flood Management – Flood Management Improvements because it will implement a project that will reduce sediment and flood impacts to natural resources and local infrastructure.

And Strategy 5: Enhance and Sustain Ecosystems – Species Migration and Movement Corridors, Floodplain Corridors because it will implement a project that will reduce sediment and flood impacts to natural resources and improve water quality and habitat for species migration and movement.

California Wildlife Action Plan:

The proposed project is consistent with the Province-Specific Conservation Strategies section of the CA Wildlife Action Plan for the South Coast region. A primary conservation target is American southwest riparian forest and woodlands habitats. An objective listed under Conservation Strategy 7 (Management Planning) for enhancing this habitat type identifies reducing the number of riparian areas impacted by waste. The project would advance this objective by installing trash and sediment capture devices that would reduce

the amount of debris and contaminants entering the Tijuana River Valley flowing through the Smuggler’s Gulch drainage channel.

The proposed project will benefit species identified as of critical importance in the South Coast Province because it will implement a project that will reduce sediment and flood impacts to natural resources. The proposed project will contribute to improved habitat for listed species such as the least Bell’s vireo and light-footed clapper rail.

California Water Action Plan:

The project is consistent with Actions 4: Protect and Restore Important Ecosystems, and 8: Increase Flood Protection. Consistent with Action 4, the project will advance the objective to restore coastal watersheds as the project would remove trash and potentially contaminated sediments from the Tijuana River Valley. Consistent with Action 8, the project will advance the objectives that address reducing flood risks by removing debris from the watershed via trash and sediment capture structures, thereby reducing flood risks by enhancing water flow in the Tijuana River Valley.

The proposed project is consistent with the California Coastal Sediment Management Master Plan – San Diego Region as it will implement a project that will reduce sediment and flood impacts to natural resources and local infrastructure.

4. **Support of the public:** The project includes broad support including support from California State Senator Ben Hueso, California State Assembly member Lorena Gonzalez-Fletcher, County of San Diego Supervisor Nora Vargas, City of Imperial Beach Mayor Serge Dedina, the San Diego Regional Water Quality Control Board, U.S. EPA Region 9, and the Cities of San Diego, Chula Vista, and Coronado, as well as the Port of San Diego, California State Lands Commission, and the Surfrider Foundation. Citizens for Coastal Conservancy and a local resident have submitted letters in opposition to the proposed project. See Exhibit 3 for Project Letters.
5. **Location:** See the “Project Summary”.
6. **Need:** Without Conservancy funding the proposed project will be delayed until another significant funding source can be identified, thus prolonging impacts to the Tijuana River Valley from sediment, trash and flooding originating at Smuggler’s Gulch.
7. **Greater-than-local interest:** The issue of sediment management and the associated control of pollutants, contaminants and trash as the U.S. – Mexico Border in the Tijuana River Valley impacts the residents of southern San Diego County as well as visitors from the region and beyond.
8. **Sea level rise vulnerability:** While the project is located within the coastal zone, Smuggler’s Gulch is the eastern-most drainage in the Tijuana River Valley and is located over two miles east of the shoreline. This distance is well outside the projected levels of sea level rise for San Diego in both years 2050 and 2100 and as such, the project is expected to be protected from the vulnerabilities that come with sea level rise.

Additional Criteria

- 9. **Urgency:** The proposed project will address an existing and significant condition that contributes to unsafe conditions for recreation and access in the Tijuana River Valley as well as negative impacts to natural resources. Additionally, the funding source available for this project must be encumbered by the end of the fiscal year in June 2021.
- 10. **Resolution of more than one issue:** The proposed project will address the impacts of sediment and trash on natural resources, as well as public safety and access due to flooding.
- 11. **Leverage:** See the “Project Financing” section below.
- 12. **Readiness:** The grantee is ready to commence the project immediately and has completed preliminary work on the project.
- 13. **Realization of prior Conservancy goals:** The proposed project will build on a history of Conservancy and State investment in the TRV, including current projects funded by the Conservancy. There is a direct nexus between the proposed project and the Tijuana Estuary Tidal Restoration Project as well as the Tijuana River Valley Regional Park Campground.
- 14. **Cooperation:** The proposed project has arisen out of the cooperation of the Tijuana River Valley Recovery Team.

PROJECT FINANCING

Coastal Conservancy	\$10,000,000
County of San Diego General Purpose Revenue	\$323,800
Project Total	\$10,323,800

The expected source of funds for this project is the FY 2020/21 appropriation to the Conservancy from the California Drought, Water, Parks, Climate, Coastal Protection, and Outdoor Access For All Act of 2018 (Proposition 68, Public Resources Code Sections 80000-80173). Chapter 9 of Proposition 68 (section 80120-80121) allocates funds to the Conservancy to enhance and protect coastal and ocean resources, and, in particular, to grant funds to public agencies and nonprofit organizations for protection of beaches, bays, wetlands, and coastal watershed resources. (Public Resources Code Section 80120 (c)).

The Conservancy will use a portion of the \$15 million of Proposition 68 funds that the legislature appropriated specifically for the Tijuana Border Pollution Control Project in the Budget Act of 2019 (Assembly Bill 74, Ting, 2019). The “Tijuana Border Pollution Control Project” identified in the Budget Act is not a discrete project but rather a suite of potential projects that seek to control inputs of trash, pollution and excessive sediment into the Tijuana River Valley and Estuary from sources in Mexico. Senate Bill 690 (Hueso, 2019) added Section 31111.3 to the Public Resources Code to further guide the expenditure of these funds by stating, “When

granting funds appropriated by Assembly Bill 74 (Chapter 23 of the Statutes of 2019 [the Budget Act of 2019]) for purposes of addressing transboundary flows and pollution in the Tijuana River Valley, the conservancy [sic] is encouraged to prioritize those projects identified in the studies described in subdivision (b) of Section 5907.5, to the extent feasible.” Section 5907.5 states that the County of San Diego shall, among other things, conduct “A study focused on the improvement and protection of natural lands, including the main river channel, in the Tijuana River Valley.” The proposed project is identified in the County’s Needs and Opportunities Assessment (2020), which was written per Section 5907.5 of the Public Resources Code.

Consistent with the purposes of Proposition 68, the proposed project consists of the implementation of sediment and trash control infrastructure that will protect the beaches, wetlands and coastal resources of the Tijuana River Watershed and adjacent areas.

CONSISTENCY WITH CONSERVANCY’S ENABLING LEGISLATION:

The proposed project would be undertaken pursuant to Chapter 3 (Section 31111.3) and Chapter 5.5 (Section 31220) of the Conservancy’s enabling legislation, Division 21 of the Public Resources Code regarding funding projects identified Tijuana River Valley Needs and Opportunities Assessment (2020) and integrated coastal and marine resources protection, respectively.

Consistent with Section 31111.3, the proposed authorization would fund a project identified by the Tijuana River Valley Needs and Opportunities Assessment, which was prepared consisted with the requirements described in subdivision (b) of Section 5907.5.

Consistent with Section 31220(a), the proposed project would “protect coastal ... water quality and habitats” by implementing a “sediment management” project. The State Water Resources Control Board was consulted to ensure consistency with Chapter 3, section 30915 of Division 20.4 of the Public Resources Code.

Consistent with Section 31220(b), the proposed project “(2) reduces contamination of waters within the coastal zone or marine waters” and “(6) ... protects ...coastal wetlands, riparian areas, floodplains, and other sensitive watershed lands, including watershed lands draining to sensitive coastal or marine areas.”

The proposed project will implement a project consistent with current and anticipated regulatory processes, including the San Diego Regional Water Quality Control Board Land Disposal and Total Maximum Daily Load Program.

The proposed project is consistent with the following goal of the Tijuana River Valley Local Coastal Program Land Use Plan:

Overall Goal: To provide flood protection commensurate with economic cost benefits for urbanized portions of south San Diego and Tijuana, Mexico, and to provide benefits to satisfy the International Treaty with Mexico – The proposed project will implement a sediment and trash management project in the river valley that is critical to proper function of flood control infrastructure.

City of San Diego MSCP Subarea Plan’s Multi-Habitat Planning Area (MHPA) Goal: Restore the Tijuana River Valley to a broad natural floodplain containing riparian and wetland habitats, bounded by high mesas and deep canyons with chaparral, sage scrub, and grasslands. – The proposed project will implement a project that will serve to protect riparian and wetland habitats.

City of San Diego MSCP Subarea Plan’s Multi-Habitat Planning Area Goal: Intermix the natural habitat with compatible agricultural, recreational and water quality improvement activities, all functioning in concert to maintain and enhance natural ecosystems and the local quality of life and environment. – The proposed project will contribute to critical water quality improvements for the Tijuana River Valley.

CONSISTENCY WITH CONSERVANCY’S [2018-2022 STRATEGIC PLAN](#) GOAL(S) & OBJECTIVE(S):

Consistent with **Goal 6, Objective D** of the Conservancy’s 2018-2022 Strategic Plan, the proposed project will implement a project that preserves and enhances coastal watersheds and floodplains.

Consistent with **Goal 6, Objective G** of the Conservancy’s 2018-2022 Strategic Plan, the proposed project will implement a project that improves water quality to the benefit of coastal and ocean resources.

Consistent with **Goal 16, Objective A** of the Conservancy’s 2018-2022 Strategic Plan, the proposed project will implement a project that directly benefits disadvantaged communities.

CONSISTENCY WITH LOCAL WATERSHED MANAGEMENT PLAN/STATE WATER QUALITY CONTROL PLAN:

“A Binational Vision for the Tijuana River Watershed”, (Institute for Regional Studies of the Californias and the Department of Geography at San Diego State University, 2005) acknowledges that restoration and maintenance of the Tijuana River Estuary requires excavation of accumulated sediment, construction and routine excavation of sediment basins at canyon mouths draining into the estuary, and implementation of erosion control projects in the canyons draining into the estuary. The Proposed project will control and/or manage sediment in the Tijuana River Valley.

The Water Quality Control Plan (“Plan”) for the San Diego Basin recognizes the Tijuana River Estuary as an important resource and sets beneficial uses and water quality objectives for the

river valley, estuary and tributary creeks in the Tijuana Watershed. One of the ways the San Diego Regional Water Quality Control Board implements its Plan is by issuing municipal storm water permits that include waste discharge requirements. As co-permittees, the City of San Diego, City of Imperial Beach and County of San Diego established the Tijuana River Watershed Urban Runoff Management Program (“Program”) to plan and implement activities in order to comply with the municipal permit and reduce impacts of urban activity on receiving water quality within the watershed. The Program’s annual report acknowledges the sediment excavation activities of the County of San Diego and City of San Diego and discusses the Tijuana River Valley Recovery Team work on reducing and controlling sediment in the river valley. The proposed project will control and/or manage sediment in the river valley. In March 2015, the San Diego Water Board adopted Tentative Resolution No. R9-2015-0036, the. The Five-Year Action Plan identifies Targeted Sediment and Trash Removal Projects as a Tier 1 project, indicating that it is among the highest priority projects for the Recovery Team. Thus, the proposed project is consistent with both the Local Watershed Management Plan and the State Water Quality Control Plan.

CEQA COMPLIANCE:

Staff has independently evaluated the Regional General Permit (RGP) 53 Project Initial Study/Mitigated Negative Declaration (IS/MND) adopted on May 28, 1998, by the County Board of Supervisors and the Addendum to the Initial Study/Mitigated Negative Declaration April 2021 for the Regional General Permit 53 Project (Addendum) adopted by the County Board of Supervisors on April 23, 2021 and concurs that there is no substantial evidence that the proposed project will have a significant effect on the environment. Staff therefore recommends that the Conservancy find that the project as mitigated avoids, reduces or mitigates the possible significant environmental effects to a level of less-than-significant and that there is no substantial evidence that the project will have a significant effect on the environment as that term is defined by 14 Cal. Code Regs. §15382.

The approved IS/MND identified potential adverse impacts to three species on the Federal and State Endangered Species lists (least Bell’s vireo, southwestern willow flycatcher, and arroyo toad), as well as potential adverse impacts to wetland habitats. The Addendum found no additional impacts as a result of expanded activities. Mitigation will be incorporated to reduce potential adverse impacts to less than significant levels, and special conditions will be incorporated if necessary, to further minimize impacts. A mitigation plan will be developed in consultation with permitting agencies following the selection of the preferred alternative.

Upon approval of the project, Conservancy staff will file a Notice of Determination.