

FINAL

INITIAL STUDY
MITIGATED NEGATIVE DECLARATION

SAN ELIJO STATE BEACH
REPLACE LIFEGUARD HEADQUARTERS PROJECT



December 2006
SCH # 2006111022



State of California
DEPARTMENT OF PARKS AND RECREATION

MITIGATED NEGATIVE DECLARATION

PROJECT: SAN ELIJO STATE BEACH-- REPLACE LIFEGUARD HEADQUARTERS PROJECT

LEAD AGENCY: California Department of Parks and Recreation

AVAILABILITY OF DOCUMENTS: The Initial Study for this Mitigated Negative Declaration was available for public review during regular business hours at:

- San Diego Coast District Headquarters
California Department of Parks & Recreation
4477 Pacific Coast Highway
San Diego, CA 92110
- Southern Service Center
California Department of Parks and Recreation
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108
- Cardiff-By-The-Sea Branch Library
2081 Newcastle Avenue
Cardiff-By-The-Sea, CA 92007

PROJECT DESCRIPTION:

This Project replaces an existing lifeguard headquarters located on a bluff at the southern end of San Elijo State Beach. The bluff on the beach side of the lifeguard headquarters has been eroding and is currently at a point where it is jeopardizing the building's structural stability. A replacement lifeguard headquarters facility, consisting of a replacement Observation Tower and a Lifeguard Support Facility, is proposed in a location that will not be in danger by the bluff erosion but will maintain the current level of visual monitoring for the beach and ocean below and enhance support for lifeguard activities that are currently supplied by other facilities located in Carlsbad.

A copy of the Initial Study is attached. Questions or comments regarding this Initial Study/Mitigated Negative Declaration may be addressed to:

Tina Robinson, Environmental Coordinator
Southern Service Center
California Department of Parks & Recreation
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108
trobenson@parks.ca.gov
(619) 220-5324
(619) 220-5400 (FAX)

Pursuant to Section 21082.1 of the California Environmental Quality Act, the California Department of Parks and Recreation (DPR) has independently reviewed and analyzed the Initial Study and Negative Declaration for the proposed project and finds that these documents reflect the independent judgment of DPR. DPR, as lead agency, also confirms that the project mitigation measures detailed in these documents are feasible and will be implemented as stated in the Negative Declaration.

Ronilee Clark
District Superintendent

Date

Tina Robinson
Environmental Coordinator

Date

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CHAPTER 1 INTRODUCTION

1.1 INTRODUCTION AND REGULATORY GUIDANCE

The Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared by the California Department of Parks and Recreation (DPR) to evaluate the potential environmental effects of the proposed Replace Lifeguard Headquarters Project at San Elijo State Beach, San Diego County, California. This document has been prepared in accordance with the California Environmental Quality Act (CEQA), Public Resources Code §21000 *et seq.*, and the State CEQA Guidelines, California Code of Regulations (CCR) §15000 *et seq.*

An Initial Study is conducted by a lead agency to determine if a project may have a significant effect on the environment [CEQA Guidelines §15063(a)]. If there is substantial evidence that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) must be prepared, in accordance with CEQA Guidelines §15064(a). However, if the lead agency determines that revisions in the project plans or proposals made by or agreed to by the applicant mitigate the potentially significant effects to a less-than-significant level, a Mitigated Negative Declaration may be prepared instead of an EIR [CEQA Guidelines §15070(b)]. The lead agency prepares a written statement describing the reasons a proposed project would not have a significant effect on the environment and, therefore, why an EIR need not be prepared. This IS/MND conforms to the content requirements under CEQA Guidelines §15071.

1.2 LEAD AGENCY

The lead agency is the public agency with primary approval authority over the proposed project. In accordance with CEQA Guidelines §15051(b)(1), "the lead agency will normally be an agency with general governmental powers, such as a city or county, rather than an agency with a single or limited purpose." The lead agency for the proposed project is DPR. The contact person for the lead agency is:

Suzi Lahitte, Project Manager
Southern Service Center
California Department of Parks & Recreation
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108
(619) 220-5411

All inquiries regarding environmental compliance for this project, including comments on this environmental document should be addressed to:

Tina Robinson, Environmental Coordinator

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Southern Service Center
California Department of Parks & Recreation
8885 Rio San Diego Drive, Suite 270
San Diego, CA 92108
trobinson@parks.ca.gov
(619) 220-5324
(619) 220-5400 (FAX)

1.3 PURPOSE AND DOCUMENT ORGANIZATION

The purpose of this document is to evaluate the potential environmental effects of the proposed Replace Lifeguard Headquarters Project at San Elijo State Beach. Mitigation measures have also been incorporated into the project to eliminate any potentially significant impacts or reduce them to a less-than-significant level.

This document is organized as follows:

- Chapter 1 - Introduction.
This chapter provides an introduction to the project and describes the purpose and organization of this document.
- Chapter 2 - Project Description.
This chapter describes the reasons for the project, scope of the project, and project objectives.
- Chapter 3 - Environmental Setting, Impacts, and Mitigation Measures.
This chapter identifies the significance of potential environmental impacts, explains the environmental setting for each environmental issue, and evaluates the potential impacts identified in the CEQA Environmental (Initial Study) Checklist. Mitigation measures are incorporated, where appropriate, to reduce potentially significant impacts to a less-than-significant level.
- Chapter 4 - Mandatory Findings of Significance
This chapter identifies and summarizes the overall significance of any potential impacts to natural and cultural resources, cumulative impacts, and impact to humans, as identified in the Initial Study.
- Chapter 5 - Summary of Mitigation Measures.
This chapter summarizes the mitigation measures incorporated into the project as a result of the Initial Study.
- Chapter 6 - References.
This chapter identifies the references and sources used in the preparation of this IS/MND. It also provides a list of those involved in the preparation of this document.
- Chapter 7 - Report Preparation

This chapter provides a list of those involved in the preparation of this document.

1.4 SUMMARY OF FINDINGS

Chapter 3 of this document contains the Environmental (Initial Study) Checklist that identifies the potential environmental impacts (by environmental issue) and a brief discussion of each impact resulting from implementation of the proposed project. Based on the IS and supporting environmental analysis provided in this document, the proposed Replace Lifeguard Headquarters Project would result in less-than-significant impacts for the following issues: aesthetics, agricultural resources, air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation/traffic, and utilities and service systems.

In accordance with §15064(f) of the CEQA Guidelines, a MND shall be prepared if the proposed project will not have a significant effect on the environment after the inclusion of mitigation measures in the project. Based on the available project information and the environmental analysis presented in this document, there is no substantial evidence that, after the incorporation of mitigation measures, the proposed project would have a significant effect on the environment. It is proposed that a Mitigated Negative Declaration be adopted in accordance with the CEQA Guidelines.

CHAPTER 2 PROJECT DESCRIPTION

2.1 INTRODUCTION

This Initial Study/Mitigated Negative Declaration (IS/MND) has been prepared by the California Department of Parks and Recreation (DPR) to evaluate the potential environmental effects of the proposed Replace Lifeguard Headquarters Project at San Elijo State Beach, located near the community of Cardiff and in the City of Encinitas, San Diego County, California. The site is approximately 25 miles north of the City of San Diego. The proposed project replaces an existing lifeguard headquarters facility located on a bluff at the southern end of San Elijo State Beach. The park offers swimming, surfing, surf camps, a camp store, camping, and picnicking. Both the camping and day-use facilities offer access to the beach. Another popular State Park, Cardiff State Beach offers day-use facilities and is located immediately south of the building.

The bluff on the beach side of the lifeguard headquarters has been eroding and is currently at a point where it is jeopardizing the tower's structural stability. A replacement lifeguard headquarters facility, consisting of a replacement observation tower and a lifeguard support facility, is proposed in a location that will not be in danger by the bluff erosion but will maintain the current level of visual monitoring for the beach and ocean below and enhance support for lifeguard activities that are currently supplied by other facilities located in Carlsbad.

2.2 BACKGROUND AND NEED FOR THE PROJECT

The existing lifeguard headquarters was built between 1966 and 1967 and is the dispatch point for Torrey Pines State Beach, Cardiff State Beach and San Elijo State Beach. Immediately to the Southwest of the tower is the Cardiff Reef, a popular surf spot and the San Elijo Lagoon outlet. The outlet and a break in the reef create a strong rip current known as the Cardiff Rip. The building is located on a bluff that provides a commanding view of the rip current and the water from Seaside in the south and north to Swami's. The viewshed of this stretch of beach includes numerous popular surf spots including Tabletops, Palisades, Seaside, Georges or Proving Grounds, Cardiff Reef, Tippers, 8560's, Turtles, Barney's, Pipes, and Swami's. Because these locations are used 365 days a year by the public, the lifeguard headquarters is staffed year round. The State Park Lifeguards also coordinate emergency services with lifeguards in the nearby cities of Encinitas, Solana Beach, and Del Mar.

In the 39 years since the lifeguard headquarters was built, the changing roles and responsibilities of lifeguards have placed severe limitations on the facility's ability to provide adequate public safety and service. It is functionally obsolete. More advanced communication equipment, life-saving gear, first-aid equipment, and the integration of men and women as lifeguards require more space. Therefore, the project was designed to increase the size of the observation tower and support facility. Most

importantly, the existing lifeguard headquarters is now very close to the edge of the eroding bluff and will be structurally undermined if it is not replaced.

Lifeguards provide critical water safety for the public. Because drowning victims succumb within minutes, lifeguards regard visibility of and access to the water as the most important factor in saving lives. Statewide, California State Lifeguards performed over 10,000 water rescues in 2003 and have rescued over 200,000 people since 1967. 50% of the United States population are non-swimmers. The United States Lifesaving Association estimates that there is less than a one in eighteen million chance of drowning when certified lifeguards are on duty.

At San Elijo and Cardiff State Beaches, lifeguards have performed 641 water rescues in the last two years. Additionally, they have performed 110 major first aids (injury or illness that requires a visit to the doctor or emergency room), over 30,000 preventative contacts, and nearly 14,000 law enforcement warnings in the same time period. Many of the rescues are either from the rip current at Cardiff or of small children that get caught in the numerous rip currents that pull along the beach in front of the campground. The rip currents vary in location and intensity, depending on surf and tide conditions and sand movement.

2.3 PROJECT DESCRIPTION

The facility location was determined by the physical limitations of the advancing bluff erosion, (approximately 0.4 feet per year – Ninyo & Moore 2005); by the set back requirements in the San Elijo State Park General Plan (no permanent development from the face of bluff extending inland to a plane formed by a 45 degree angle from the existing toe of bluff); and the life-safety operational requirements for maintaining the current level of visual monitoring for the beach and ocean. The assumption of a 50 year life span for the observation tower becomes the most critical criteria for determining the bluff setback requirement. At an average erosion rate of 0.4 feet of bluff per year, the minimum bluff setback for a 50 year life would be 20 feet. As a result of the minimum 20 foot bluff setback requirement, the observation tower and the support facility will be located beyond (eastward of) the centerline of the bluff. It is proposed that the observation tower be located on the bluff, but beyond the bluff setback, and extend (cantilevered) toward the shoreline in order to maintain the best possible sight lines for the beach and ocean. The support facility would then be located on the back (east) side of the existing bluff to minimize the amount of building structure visible on the bluff, and to locate the garages near the vehicular circulation patterns currently in the Park. As a result of this configuration, the proposed lifeguard headquarters will consist of three distinct elements.

The first element is the observation tower which will be elevated above the bluff to a height that will provide observation sight lines to the beach and base of bluff. The existing observation tower is 21 feet above grade. Because of the bluff setback requirements, the new observation tower is anticipated to be at approximately 24 feet above grade. These sight lines will match the existing sight lines as closely as possible.

Additionally, an antenna for emergency/lifeguard communications and lightning rods may extend beyond the roofline. The observation tower will have a supporting “base” which will anchor the building to the bluff and allow for the “cantilever” of the observation tower toward the shoreline. The observation area will be about 700 square feet in size. The observation cab and deck account for approximately 375 square feet of the total, and the stairway and base for the remainder. The observation area will provide visual oversight of the beaches and will also function as a dispatch and communications hub for three State Beaches: San Elijo, Cardiff and Torrey Pines.

The second element is the walkway which will connect the observation tower base, located near the top of the bluff, to the upper level of the support facility, located on the eastern side of the bluff. This walkway will be elevated above the sloping grade of the bluff and will be about 200 square feet in size.

The third element is the support facility which will contain the day-to-day functions for operation of the lifeguard headquarters. The lower level will be excavated into the eastern side of the bluff. The finished floor will be between 12’ and 14’ below the top of the bluff at about the level of the adjacent Park campground. The exterior wall of the support facility on the bluff side will be a retaining wall below grade and an exterior wall above grade extending approximately 8’ to 12’ above the finished grade to the roof line. The bluff-side wall will have perpendicular retaining walls extending out to intersect the existing slope. These perpendicular walls will also extend full height approximately 8’ to 12’ up from the finished grade to the proposed roof line. The upper level of the support facility will be at approximately the same elevation as the base of the observation tower and be about 400 square feet.

The functions in the support facility will include a contact area and first-aid area for the public with at least one foot bath for sting ray treatments. Additionally there will be shower and locker rooms for male and female staff, garages for State lifeguard vehicles and rescue water craft, a small kitchenette, storage areas for dry and wet storage, mechanical and communications equipment areas, a stairway, and office space for both lifeguard and park ranger staff. The dry garage will also serve as a training room for required safety updates during the off season. The locker rooms, offices and first-aid area will be approximately 1300 square feet, the wet storage and garage will be about 725 square feet and the dry garage/storage about 920 square feet. Outdoor vehicle and equipment wash down areas will be drained to either a low-flow system (with sand trap) to the sewer or through a sand trap/biofilter system that will connect to an existing drainage system. The lifeguard headquarters will be designed to be fully compliant and accessible as required by the Americans with Disabilities Act (ADA) and the California Building Code.

Proposed construction area improvements around the new facility may include site improvements such as: non-native plant species removal, native plant material re-vegetation, irrigation, sub-surface drainage, surface drainage, bluff-top safety railing or fencing, slope erosion control & protection, paving, decking, stairs, retaining walls, emergency vehicle parking, driveways, security lighting, pedestrian access, public scenic view point, benches or picnic table, outdoor showers, trash receptacles,

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information and interpretive signage.

After the demolition of the existing lifeguard headquarters, the bluff-top area will require site improvements. Two options are being explored.

Option one at the bluff-top area is to leave the existing paving and building concrete slab/footings if possible and place a new deck and additional paving over the existing surface. This proposed option will provide an enhanced public viewing point at this location. The area may have a picnic table or benches, new paving and/or decking, emergency vehicular parking, drainage improvements, some safety railing and/or fencing, trash receptacle and some information and interpretive signage.

Option two would be to remove the existing bluff-top area paving and existing building slab/footings and restore a portion of the bluff-top area to a native planting area. This option would reduce the public viewing area but would restore the bluff with native vegetation to help prevent erosion. The remaining area near and under the base of the new proposed facility would require new paving, emergency vehicular parking, drainage improvements, some safety railing and/or fencing, trash receptacle and some information and interpretive signage.

The existing asphalt paved access to the existing bluff-top area could be repaved and new safety railing and/or fencing could be installed.

The slope around the proposed lifeguard headquarters would require re-grading for slope repairs, erosion control, slope protection, surface drainage control, native plant materials and irrigation. It is proposed that the removed native soil material from the proposed headquarters location would be used to repair/fill existing slope erosion damage and be used to provide an emergency vehicular access at the toe of the existing bluff to the existing sand beach. Currently there is a deteriorated railroad tie/timber stair system leading from the path behind the existing campfire center area to the existing lifeguard tower. This stair structure would be removed and the erosion it has created would be repaired/filled, re-vegetated and irrigated. With the placement of the new lifeguard headquarters there would be newly designed landscape retaining walls and concrete stairway incorporated into the newly graded slope to provide outside access from the observation tower to the support facility and out onto the beach.

The existing lifeguard headquarters is provided with electric, water, sewer, telephone and communications utilities. The proposed lifeguard headquarters will make it necessary to relocate and possibly upgrade the existing utilities. This will involve trenching from existing service connects to the new buildings. Trenches excavated to install existing utilities will be utilized to the greatest extent feasible. The proposed lifeguard headquarters may also be provided with gas service from an existing supply line located within the existing paved roadway which provides access to the area.

2.4 VISITATION TO SAN ELIJO STATE BEACH AND CARDIFF STATE BEACH

San Elijo State Beach offers camping, day-use picnicking, a beach wheelchair, exhibits and programs, ocean fishing, and swimming. The nearby reef is popular with surfers, snorklers and divers. Annual visitation was 961,316 in 2005 and 821,939 in 2004. Cardiff State Beach offers day-use picnicking, swimming, surfing, and ocean fishing. Annual visitation was 1,479,404 in 2005 and 1,241,352 in 2004. Torrey Pines State Beach is also serviced for dispatch through the lifeguard headquarters at San Elijo State Beach. Visitation to Torrey Pines State Beach was 1,347,173 in 2005 and 1,395,315 in 2004.

2.5 CONSISTENCY WITH LOCAL PLANS AND POLICIES

The 1984 San Diego Coastal State Park System General Plan, Volume 6 – San Elijo State Beach describes the types of land use, activities, goals and guidelines that are appropriate for the site. It was approved by the State Park and Recreation Commission. The Declaration of Purpose for the park is:

The purpose of San Elijo State Beach is to make available to the people, for their benefit and enjoyment forever, the scenic, natural, cultural, and recreational resources of the ocean beach and related uplands.

The function of the California Department of Parks and Recreation at San Elijo State Beach shall be to preserve and protect public opportunities for ocean beach-oriented recreation in a high-quality environment. A natural setting for recreational activities shall be preserved. Important natural features shall not be degraded.

The project has been designed to be consistent with General Plan's Bluff Setback Policy and a lifeguard headquarters is an important element in the facility recommendations. The General Plan also recommends that present land uses be maintained.

The City of Encinitas has several plans that affect the area. The City's General Plan and Local Coastal Plan identify issues in their Recreation and Public Safety Elements that are generally consistent with the project's design. The area is identified as a High Sensitivity Area in the 1993 SANDAG Shoreline Preservation Strategy. Additionally, the site is near bikeways and trails identified in the City's Bikeway and Recreational Trails Master Plans. The Coastal Rail Trail is proposed to be constructed nearby as well. The project is consistent with these planning efforts and will provide the public with improved public safety facilities close to the bikeway and trails.

2.6 DISCRETIONARY APPROVALS

The project is located in a sensitive coastal area and adjacent to the San Elijo Lagoon mouth. Therefore, a coastal permit will be required and is subject to the City of Encinitas Local Coastal Plan and permit process. The project site is less than one acre

and will be reviewed by the San Diego Regional Water Quality Control Board to ensure that appropriate water quality goals and guidelines are followed.

2.7 RELATED PROJECTS

The San Elijo State Beach campground was rehabilitated in 2000 by the California Department of Parks and Recreation (DPR). DPR is also in the process of repairing and improving the day use facilities at Cardiff State Beach, south of the project site. The City of Encinitas is undergoing planning efforts for the Cardiff-by-the-Sea Specific Plan, which will affect the business district located across South Coast Highway 101 and the railroad tracks. The San Elijo Lagoon Conservancy, in conjunction with the U.S. Army Corp. of Engineers, is actively pursuing the San Elijo Lagoon Restoration Feasibility Study which would direct management activities for the lagoon, including dredging, and may affect the lagoon mouth location. Approval and construction of the Lifeguard Headquarters should not effect or be effected by any of these projects.

**CHAPTER 3
ENVIRONMENTAL CHECKLIST**

PROJECT INFORMATION

- | | |
|--|--|
| 1. Project Title: | San Elijo State Beach Replace Lifeguard Headquarters |
| 2. Lead Agency Name & Address: | California Department of Parks and Recreation |
| 3. Contact Person & Phone Number: | Tina Robinson, (619) 220-5324 |
| 4. Project Location: | San Elijo State Beach, City of Encinitas, County of San Diego |
| 5. Project Sponsor Name & Address: | California Department of Parks and Recreation
San Diego Coast District
4477 Pacific Coast Highway
San Diego, CA 92110 |
| 6. General Plan Designation: | State Beach |
| 7. Zoning: | Park |
| 8. Description of Project: | Replacement of existing lifeguard headquarters |
| 9. Surrounding Land Uses & Setting: | Refer to Chapter 3 of this document (Section IX, Land Use Planning) |
| 10. Approval Required from Other Public Agencies | Refer to Chapter 2, Section 2.6 |

1. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact", as indicated by the checklist on the following pages.

- | | | |
|--|---|---|
| <input checked="" type="checkbox"/> Aesthetics | <input type="checkbox"/> Agricultural Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input type="checkbox"/> Cultural Resources | <input checked="" type="checkbox"/> Geology/Soils |
| <input type="checkbox"/> Hazards & Hazardous Materials | <input checked="" type="checkbox"/> Hydrology/Water Quality | <input type="checkbox"/> Land Use/Planning |
| <input type="checkbox"/> Mineral Resources | <input type="checkbox"/> Noise | <input type="checkbox"/> Population/Housing |
| <input type="checkbox"/> Public Services | <input checked="" type="checkbox"/> Recreation | <input type="checkbox"/> Transportation/Traffic |
| <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Mandatory Findings of Significance | <input type="checkbox"/> None |

DETERMINATION

On the basis of this initial evaluation:

I find that the proposed project **COULD NOT** have a significant effect on the environment and a **NEGATIVE DECLARATION** will be prepared.

I find that, although the original scope of the proposed project **COULD** have had a significant effect on the environment, there **WILL NOT** be a significant effect because revisions/mitigations to the project have been made by or agreed to by the applicant. A **MITIGATED NEGATIVE DECLARATION** will be prepared.

I find that the proposed project **MAY** have a significant effect on the environment and an **ENVIRONMENTAL IMPACT REPORT** or its functional equivalent will be prepared.

I find that the proposed project **MAY** have a "potentially significant impact" or "potentially significant unless mitigated impact" on the environment. However, at least one impact has been adequately analyzed in an earlier document, pursuant to applicable legal standards, and has been addressed by mitigation measures based on the earlier analysis, as described in the report's attachments. An **ENVIRONMENTAL IMPACT REPORT** is required, but it must analyze only the impacts not sufficiently addressed in previous documents.

I find that, although the proposed project could have had a significant effect on the environment, because all potentially significant effects have been adequately analyzed in an earlier EIR or Negative Declaration, pursuant to applicable standards, and have been avoided or mitigated, pursuant to an earlier EIR, including revisions or mitigation measures that are imposed upon the proposed project, all impacts have been avoided or mitigated to a less-than-significant level and no further action is required.

Tina Robinson
Environmental Coordinator

November 2, 2006
Date

EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers, except "No Impact", that are adequately supported by the information sources cited. A "No Impact" answer is adequately supported if the referenced information sources show that the impact does not apply to the project being evaluated (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on general or project-specific factors (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must consider the whole of the project-related effects, both direct and indirect, including off-site, cumulative, construction, and operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, the checklist answers must indicate whether that impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate when there is sufficient evidence that a substantial or potentially substantial adverse change may occur in any of the physical conditions within the area affected by the project that cannot be mitigated below a level of significance. If there are one or more "Potentially Significant Impact" entries, an Environmental Impact Report (EIR) is required.
4. A "Mitigated Negative Declaration" (Negative Declaration: Less Than Significant with Mitigation Incorporated) applies where the incorporation of mitigation measures, prior to declaration of project approval, has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact with Mitigation." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level.
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR (including a General Plan) or Negative Declaration [CCR, Guidelines for the Implementation of CEQA, § 15063(c)(3)(D)]. References to an earlier analysis should:
 - a) Identify the earlier analysis and state where it is available for review.
 - b) Indicate which effects from the environmental checklist were adequately analyzed in the earlier document, pursuant to applicable legal standards, and whether these effects were adequately addressed by mitigation measures included in that analysis.
 - c) Describe the mitigation measures in this document that were incorporated or refined from the earlier document and indicate to what extent they address site-specific conditions for this project.
6. Lead agencies are encouraged to incorporate references to information sources for potential impacts into the checklist or appendix (e.g., general plans, zoning ordinances, biological assessments). Reference to a previously prepared or outside document should include an indication of the page or pages where the statement is substantiated.
7. A source list should be appended to this document. Sources used or individuals contacted should be listed in the source list and cited in the discussion.
8. Explanation(s) of each issue should identify:
 - a) the criteria or threshold, if any, used to evaluate the significance of the impact addressed by each question **and**
 - b) the mitigation measures, if any, prescribed to reduce the impact below the level of significance.

ENVIRONMENTAL ISSUES

I. AESTHETICS.

ENVIRONMENTAL SETTING

The location is a sensitive vista because of the proximity to the coast, lagoon mouth, and coastal bluff. There is mature vegetation on the site, including large shrubs and trees. However, the site is also blighted by the immediate proximity of South Coast Highway 101, traffic, the railroad track, the existing lifeguard headquarters, campground facilities and RV's, and other man made intrusions. Views towards the ocean are exceptional and allow viewing of beach activities and near shore wildlife such as pelicans, porpoises, and shore birds. From the top of the bluff in the campground, there are 180 degree views of the ocean. Views from the beach generally exclude many of the man made intrusions in the site.

	<u>POTENTIALLY SIGNIFICANT IMPACT</u>	<u>LESS THAN SIGNIFICANT WITH MITIGATION</u>	<u>LESS THAN SIGNIFICANT IMPACT</u>	<u>NO IMPACT</u>
WOULD THE PROJECT:				
a) Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION

a - c) The project was placed in the present location to minimize adverse aesthetic effects while providing the lifeguards the facility that they need (please see Section 2.2). Due to the increased size of the building, it has the potential to adversely affect the scenic vista of the Park. Therefore, the bulk of the building, the support facility, will be tucked into the back side of the coastal bluff. The view of the building will be softened from several views by the large shrubs and trees nearby. The observation area of the facility will be visually similar in scope and scale to the existing building although in a different location. Mature trees nearby will be largely avoided by the construction and the site will be landscaped to soften the presence of the building. It will be located near the existing restroom/shower building in the campground. Landscaping and amenities will also cover the site where the existing lifeguard headquarters will be demolished. Because of the visual blight associated with man made features inside and outside of the Park, views from the nearby residential areas will not have substantially adverse effects. Views from the beach, primarily in Cardiff State Beach, will be more affected by the building because it extends towards the

campground from the bluff and the stairway will increase the bulk of the building from that view. This view will, however be partially screened by new and existing vegetation.

- c) The observation area’s glass could cause new reflective glare, but lighting will be minimized or cast either against the building (for security) or down.

MITIGATION MEASURES AESTHETIC
In addition to sensitive design, DPR proposes to use building materials that are earth toned and landscaping to mitigate the view of the building. Mature existing vegetation near the building will be left in place to the greatest extent feasible.

II. AGRICULTURAL RESOURCES.

ENVIRONMENTAL SETTING

Since the site is a highly developed State Beach, there is no agriculture on site.

WOULD THE PROJECT*:	<u>POTENTIALLY SIGNIFICANT IMPACT</u>	<u>LESS THAN SIGNIFICANT WITH MITIGATION</u>	<u>LESS THAN SIGNIFICANT IMPACT</u>	<u>NO IMPACT</u>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

* 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 Department of Conservation as an optional model for use in assessing impacts on agricultural and farmland.

DISCUSSION

a-c) No effect on agricultural resources

III. AIR QUALITY.

ENVIRONMENTAL SETTING

The site is located in the San Diego Air Basin. This basin is a non-attainment area for the state and federal 8 hours standards for Ozone and an expected non-attainment area for Particulate Matter (PM) 2.5. The one hour federal standard for ozone has rarely been exceeded in the last

few years. In general, trends have reduced the levels for several known pollutants but are increasing for PM 2.5 and PM 10. Air quality along the coast generally tends to be good due to onshore winds but can be poor during Santa Ana conditions if there is wildfire present in the inland mountains.

	<u>POTENTIALLY SIGNIFICANT IMPACT</u>	<u>LESS THAN SIGNIFICANT WITH MITIGATION</u>	<u>LESS THAN SIGNIFICANT IMPACT</u>	<u>NO IMPACT</u>
WOULD THE PROJECT*:				
a) Conflict with or obstruct implementation of the applicable air quality plan or regulation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Expose sensitive receptors to substantial pollutant concentrations (e.g., children, the elderly, individuals with compromised respiratory or immune systems)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Create objectionable odors affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

* Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied on to make these determinations.

DISCUSSION

a-e) Because the project replaces an existing facility, no increase in use is expected except during training events in the off season. Such an increase would be nominal and only involve 20 vehicles at the most in addition to the campground traffic. The site will be graded and existing tower demolished according to standard protocols for containment.

MITIGATION MEASURES AIR QUALITY
Standard construction protocols for dust control during demolition and grading & removal of any potentially hazardous airborne materials such as asbestos.

IV. BIOLOGICAL RESOURCES.

ENVIRONMENTAL SETTING

Vegetation

Land in the vicinity of the project site supports three landcover types: developed land, coastal bluff habitat, cobble beach/intertidal sand. In the project vicinity none of these habitats support significant cover of native vegetation.

Developed Land

Developed land includes campground buildings, camp sites, ornamental landscaping, paved roads, or denuded and compacted dirt. Plant species commonly observed in developed areas include exotic shrubs and herbs: myoporum (*Myoporum laetum*), melaluca (*Melaluca sp.*), fan palm (*Washingtonia robusta*), barley (*Hordeum sp.*), iceplant (*Mesembryanthemum spp.*), rat-tail fescue (*Vulpia myuros*), Bermuda grass (*Cynodon dactylon*), and cut-leaved plantain (*Plantago coronopus*).

Coastal Bluff

In the vicinity of the project site, Coastal bluff habitat supports very little vegetation. This is due to the extremely steep slope angle (approaching vertical) and the bare surfaces that result from frequent erosion. Wave action combined with the proximity of the San Elijo Lagoon mouth effectively removes material from the toe of the bluff. This promotes the steepness of the slope in the project vicinity. At the top of the slope there remains a narrow strip (average of about six-foot wide) westward of the campground fencing that supports a few native and non-native species. Among the native species are: coastal golden bush (*Isocoma menziesii*), wild heliotrope (*Heliotropium curassavicum*), and saltgrass (*Distichlis spicata*). Common non-native species include Australian salt bush (*Atriplex semibaccata*), cheeseweed (*Malva parviflora*), cut-leaved plantain (*Plantago coronopus*), wild radish (*Raphanus sativa*), and sea-rocket (*Cakile maritima*). Because of its small size, past disturbance and active erosion this habitat does not function as coastal bluff succulent scrub. Coastal bluff vegetation in this context does not represent a sensitive habitat type.

Coastal bluff habitat at San Elijo State Beach has been subject to several problems associated with urban runoff. Subsurface water that emanates from urban areas adjacent to State Park property, becomes exposed at the bluff faces. This moisture accelerates erosion of the coastal bluffs by loosening the structure of the sandstone. In addition to the increased quantity and velocity of water being introduced to the coastal bluffs, urban runoff can carry pollutants that further reduce the quality and function of intertidal and near-shore marine habitats.

Cobble Beach/Intertidal Sand

Cobble Beach typically occurs in the upper intertidal zone close to the toe of the coastal bluff. Intertidal sand is mixed with cobble beach in the proposed project vicinity. These habitats ephemerally support a few plant species when enough sand has accumulated to preclude tidal scouring and inundation. Because this habitat in the project vicinity is frequently inundated, the only plant species observed were sea-rocket (*Cakile maritime*) and sea-fig (*Carpobrotus sp.*).

4.2 Wildlife

Mammals

At least seven mammal species have been recently observed at San Elijo State Beach: California ground squirrel (*Spermophilus beecheyi*), Botta's pocket gopher (*Thomomys bottae*), Virginia opossum (*Didelphis virginiana*), feral cat (*Felis catus*), black rat (*Rattus rattus*), house mouse (*Mus musculus*), and domestic dog (*Canis familiaris*). Only California ground squirrel and domestic dog were observed in the vicinity of the proposed project site. The population of California ground squirrel in the project vicinity is unusually large because of feeding by park users and manmade structures that are conducive to burrow construction. The concrete and rail-road tie steps support a large burrow complex.

Birds

DPR has been regularly monitoring the Cardiff State Beach for sensitive species since November 2002. During the course of this monitoring approximately seventy bird species have been observed at Cardiff State Beach (unpublished data from Shauna Wolf 2005). Commonly observed shore birds include western gull (*Larus occidentalis*), Heermann's gull (*Larus heermanni*), ring-billed gull (*Larus delawarensis*), brown pelican (*Pelecanus occidentalis*), willet (*Catoptrophorus semipalmatus*), marbled godwit (*Limosa fedoa*), sanderling (*Calidris alba*), and double-crested cormorant (*Phalacrocorax auritus*). In the vicinity of the proposed project site the beach habitat is fairly narrow, and frequently subject to tidal inundation. These conditions preclude nesting of shorebirds in the vicinity of the project site. Upland species commonly observed include house finch (*Carpodacus mexicanus*), mourning dove (*Zenaidura macroura*), rock dove (*Columba livia*), black phoebe (*Sayornis nigricans*), common raven (*Corvus corax*), American crow (*Corvus brachyrhynchos*), and northern mockingbird (*Mimus polyglottos*). In the winter months several raptors have been observed foraging in the vicinity of the proposed project site: osprey (*Pandion haliaetus*), white-tailed kite (*Elanus caeruleus*), and red-tailed hawk (*Buteo jamaicensis*).

Reptiles and Amphibians

Two species of reptiles have been recently observed from San Elijo State Beach including side-blotched lizard (*Uta stansburiana*) and southern alligator lizard (*Gerrhonotus multicarinatus*). No amphibian species are known from within the park and few are expected to occur because of the lack of ponded water.

Invertebrates

Because of the lack of native vegetation in the project vicinity, native terrestrial insect diversity is expected to be low. A number of butterfly species were observed during surveys: pygmy blue (*Brephidium exila*), west coast lady (*Vanessa annabella*), cabbage white butterfly (*Pieris rapae*), and fiery skipper (*Hylephila phyleus muertovalle*). A yellow-lined spider (*Argiope* sp.) was observed at the northern portion of the campground outside the project APE.

Native macroinvertebrate diversity in the intertidal beach habitat is expected to be moderately high. This fauna is typically composed of several invertebrate groups including snails, bivalves, crustaceans, polychaetes, insects, and spiders. Common species expected to occur include common sand crab (*Emerita analoga*), isopods (*Excitrolana chiltoni* and *Tylos punctata*), bean clam (*Donax gouldii*), kelp flies (e.g., *Diptera* spp. and *Coelopa* spp.), polychaetes (e.g., *Euzonus mucronata*), and others.

Sensitive Biological Resources

Sensitive biological resources include plant and animal species present in the project APE that are considered sensitive by federal, state, or local conservation agencies and organizations or unique habitat areas that are of relatively limited distribution. References for determination of sensitive biological resources are as follows: wildlife, U.S. Fish and Wildlife Service (USFWS 1989, 1991), California Department of Fish and Game (Rarefind 1993, version 2002), plants, USFWS (2002), CNPS (2002), Skinner and Pavlik (1994), and Ferren et al. (1984); and habitats, Holland (1986).

Sensitive Plant Species

No sensitive plant species were identified in the project APE. Sensitive plant species known from the project vicinity or with potential to occur within the APE are described in Table 4.

Table 4. Sensitive Plant Species Potentially Occurring Within the Area of Potential Effect

Species	Conservation Status	Habitat	Status in the project vicinity
Nuttall's lotus <i>Lotus nuttallianus</i>	USFWS: None CDFG: None CNPS: List 1B	Coastal Dunes, Sandy Soils.	Not observed within project APE. Known only from s. end of Cardiff State Beach near seaside. Nuttall's lotus not observed in project APE.
Orcutt's pincushion <i>Chaenactis glabriscula</i> <i>var. orcuttiana</i>	USFWS: None CDFG: None CNPS: List 1B	Coastal slopes, dunes. Loose, sandy soils.	Not observed within project APE.
Decumbent goldenbush <i>Isocoma menziesii</i> <i>var. decumbens</i>	USFWS: None CDFG: None CNPS: List 1B	Coastal bluff scrub, sandy clay soils.	Not observed within project APE. <i>Isocoma menziesii</i> observed but does not exhibit taxonomic characteristics of <i>I.m. var. decumbens</i> .
Sea Dahlia <i>Coreopsis maritima</i>	USFWS: None CDFG: None CNPS: List 1B	Coastal slopes, dunes. Coastal bluff scrub, coastal sage scrub. Loose, sandy soils.	Not observed within project APE. Known from Bluffs east of 101 above San Elijo Lagoon.
South coast saltscale <i>Atriplex pacifica</i>	USFWS: None CDFG: None CNPS: List 1B	Coastal slopes, Coastal bluff scrub, coastal sage scrub, vernal pools, sandy	Not observed during survey. Not known from the project vicinity.

Species	Conservation Status	Habitat	Status in the project vicinity
		soils with subsurface clay.	

Sensitive Wildlife Species

Birds

Seven sensitive bird species have been observed from San Elijo or Cardiff State Beaches. None of these species have been observed to nest or breed in the project APE. These species are described in Table 5 and discussed below.

Table 5. Sensitive Bird Species Observed Within the Project Vicinity.

Species	Conservation Status	Habitat	Status in the APE
Western snowy plover <i>Charadrius alexandrinus nivosus</i>	USFWS: FT CDFG: CSC	Coastal dunes, sandy beaches, open areas in coastal wetlands.	Observed loafing and foraging during non-breeding season. No breeding habitat present within the APE. Prior to 1995 western snowy plover observed breeding inside San Elijo Lagoon well outside of the project APE.
White-tailed kite <i>Elanus leucurus</i>	USFWS: MNBMC CDFG: CR	Open vegetation, fields, meadows, grasslands. Nesting habitat in trees.	Observed at San Elijo Lagoon from Cardiff State Beach. Foraging or Nesting habitat not present within APE.
Peregrine falcon <i>Falco peregrinus</i>	USFWS: None CDFG: CE	Many habitats, open land, nesting in cliff faces or tall structures.	Observed flying near San Elijo Lagoon and near shore. Nesting habitat is not present within APE.
Osprey <i>Pandion haliaetus</i>	USFWS: None CDFG: CSC	Open water. Nests in lone and usually dead trees.	Observed foraging in San Elijo lagoon and flying along bluffs within project vicinity. Nesting or foraging habitat is not present within APE.
Belding's savannah sparrow <i>Passerculus sandwichensis</i>	USFWS: None CDFG: CE	Salt marsh, coastal wetlands	Breeding habitat within San Elijo lagoon. Breeding or foraging habitat is not present

<i>beldingi</i>			within APE.
California brown pelican <i>Pelecanus occidentalis californicus</i>	USFWS: FE CDFG: CE	Rocky shores, cliffs. California breeding habitat only on Channel Islands	Observed fishing and flying offshore from project vicinity. No important breeding, resting or roosting sites near project vicinity.
California least tern <i>Sterna antillarum browni</i>	USFWS: FE CDFG: CE	Seldom visited sandy beaches, open areas in coastal wetlands. (April-August)	Observed loafing and foraging during non-breeding season. No breeding habitat present within the APE.

CE = California Endangered

FE = Federally Endangered

FT = Federally Threatened

MNBMC = Migratory Non-game Birds of Management Concern

CSC = California Species of Special Concern

CR = California Rare

Western snowy plover and California least tern are beach, dune or open high-elevation-in-coastal-wetland, nesting species. Neither of these species has been observed breeding in the vicinity of San Elijo State Beach. The beach habitat in the vicinity of the proposed project are currently unsuitable as breeding habitat for western snowy plover or California least tern. In the vicinity of the proposed project, nearly all the beach habitat is subject to year-round tidal inundation. At low tides and during summer months, when the beach is accumulating sand, the narrow beach is heavily used by park visitors. During the winter or early spring months, both western snowy plover and California least tern have been observed using the beach for feeding or resting en-route to more suitable breeding habitat.

Belding's savannah sparrow is known to breed within salt marsh habitat within San Elijo lagoon. The closest potential breeding habitat is greater than 250 meters (800 feet) away from the proposed project. California brown pelican are frequently observed flying over and feeding in the ocean, west of the proposed project APE. There are no breeding sites and no regularly used resting sites at San Elijo State beach. Suitable nesting sites for Raptor species (white-tailed kite, peregrin falcon, and osprey) are not present at San Elijo State Beach. It is probable that peregrin falcon and osprey use portions of the coastal bluffs to forage for California ground squirrel or other small mammals. Because the bluffs near the area of potential effect are nearly vertical, there are no ground squirrel burrows. Ground squirrels are plentiful in the campground but because of the development and presence of people and pets it is unlikely these areas would be used by raptor species.

Reptiles and Amphibians

No sensitive reptile species were observed within the project vicinity. Sensitive reptile species with potential to occur in the project vicinity are described in Table 6.

Table 6. Sensitive Reptile Species Potentially Occurring Within the Area of Potential Effect

Species	Conservation Status	Habitat	Status in the APE
coast horned lizard <i>Phrynosoma coronatum</i>	USFWS: FSC CDFG: SSC	Open habitats near harvester ant populations.	Sufficient acreage of suitable habitat not present within APE. Ubiquitous presence of Argentine ants and no native harvester ants observed during surveys. Low potential.
Orange-throated whiptail <i>Cnemidophorus hyperythrus</i>	USFWS: FSC CDFG: SSC	Open habitats near native shrublands.	Present at San Elijo State Beach in Natural area north of the campground. Suitable habitat not present within APE. during surveys. Low potential in campground area.
Silvery legless lizard <i>Anniella pulchra pulchra</i>	USFWS: FSC CDFG: SSC	Loose sandy soils.	Known from about 1 mi. from SESB on coastal bluffs. Mostly compacted soils in project vicinity. Some potential habitat between fence and bluff edge. Moderate potential for presence in loose soils elsewhere at SESB. Low potential in campground area.

Silvery legless lizard may be present in coastal bluff areas where vegetation is present and soils have not been compacted. Because most of the proposed project is to occur within developed areas with little vegetation and compacted soils, impact to silvery legless lizard is unlikely. If any planters supporting vegetation or loose soils are disturbed there could be potential for impacts to silvery legless lizard.

Mammals

No sensitive mammals were observed or detected and none are expected to occur within the APE.

Invertebrates

Only one sensitive invertebrate is likely to occur within the vicinity of SESB: the tiger beetle (*Cicindela senilis frosti*). Tiger beetle is not State- or federally-listed but is considered sensitive by entomologists and is included in the California natural diversity database. The tiger beetle is likely present in the dark-colored soils within the salt marsh habitat at San Elijo lagoon. None of this habitat is present within the proposed project APE.

Sensitive Habitats

Sensitive habitats are those considered rare within the region, support sensitive flora and/or fauna, or function as linkages for wildlife movement. Habitats that may be considered sensitive within the APE include coastal bluff habitat and cobble beach/intertidal. Since the coastal bluff habitat sand has a long disturbance history it does not support the native species richness or habitat values of coastal bluff scrub elsewhere in the region.

Although not sensitive in terms of rarity, the cobble beach/intertidal sand habitats may provide feeding and resting areas for sensitive shorebirds, habitat for intertidal species, and can act as a buffer zone between terrestrial and marine systems.

Habitat Connectivity (Wildlife Corridors and Habitat Linkages)

Wildlife corridors are relatively narrow landscape features that provide connections between larger blocks of native habitat. Habitat linkages are broader native habitat patches that join larger patches of habitat that can reduce the adverse effects of habitat fragmentation.

San Elijo State/Cardiff State Beach is surrounded on three sides by development (including residential/commercial development of the Cities of Encinitas and Solana Beach, and Pacific Coast Highway). It does not function as a terrestrial wildlife corridor or linkage. Because it occurs along the Pacific Ocean San Elijo State Beach likely serves as a flyway for shorebirds and possibly other coastal birds.

Regional Resource Planning Context

The terrestrial portion of San Elijo State Beach is not included within any regional reserves for biological resources. The marine habitat has been designated as the Cardiff and San Elijo State Marine Conservation Area and is part of a regional system of protected waters under the Marine Life Protection Act.

	<u>POTENTIALLY SIGNIFICANT IMPACT</u>	<u>LESS THAN SIGNIFICANT WITH MITIGATION</u>	<u>LESS THAN SIGNIFICANT IMPACT</u>	<u>NO IMPACT</u>
WOULD THE PROJECT:				
a) Have a substantial adverse effect, either directly or through habitat modification, on any species identified as a sensitive, candidate, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or the U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or the U.S. Fish and Wildlife Service?

- | | | | | |
|--|--------------------------|--------------------------|-------------------------------------|-------------------------------------|
| c) Have a substantial adverse effect on federally protected wetlands, as defined by §404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

DISCUSSION

a-b) All of the direct impacts associated with the proposed project will occur within developed land. No direct disturbance to coastal bluff habitat is anticipated as a result of the proposed project. No direct disturbance to cobble beach intertidal sand is expected to occur as a result of the proposed project. Indirect effects such as increased freshwater or accelerated erosion should be avoided by project design. There will be minor indirect effects of noise and water quality on beach/intertidal habitats and there is a potential for reduced habitat quality in cobble beach/intertidal sand by increased freshwater and potential urban pollutants. Indirect effects of this project, such as increased fresh water, decreased water quality and accelerated erosion should be avoided through project design features. Because the project will be located outside of the disturbed coastal bluff habitat, there is little likelihood of significant direct or indirect impacts to coastal bluff scrub resulting from the proposed project.

c) No wetlands will be directly affected by the proposed project. Due to the increase in impervious surfaces, there will be additional runoff into intertidal zones but it will be a nominal amount and will be treated for water quality at the wash area and during construction.

d) Because the proposed project would take place well-above the beach on a developed coastal bluff, it is unlikely that there will be potential for disruption of Western snowy plover or California least tern resting or foraging activities as related to the project. It is unlikely that the proposed project would result in any direct or indirect impacts to Belding’s savannah sparrow. It is unlikely that brown pelican would be significantly affected by the proposed project. The proposed project would not likely affect raptor species. Because the proposed lifeguard facility will occur in an existing developed area the proposed project should not significantly affect any of the current Pacific Flyway connectivity along the Pacific Ocean. Since the silvery legless lizard is not a State or federally-listed species the potential take of a few individuals would not likely be considered a significant impact under CEQA. It is recommended that a

monitor be present if any soil is disturbed within planted areas or near loose soils near the coastal bluffs. The monitor should document presence/absence of individuals during grading activities and make an effort to relocate any individuals if found.

e) The proposed project is located in a developed area and will have little effect on local plans but must be approved under the City of Encinitas General Plan/Local Coastal Plan. The project is consistent with the DPR coastal erosion policy and the San Elijo State Beach General Plan.

f) Since the proposed project is relatively small and terrestrial it is not likely to have a significant effect on the existing marine resources under the Marine Life Protection Act. It is likely that the Lifeguard tower would improve the marine habitat by providing a greater law enforcement presence with respect to the Marine Life Protection Act.

CONSTRUCTION AND MITIGATION MEASURES - BIOLOGY

Significant impacts to sensitive habitat or sensitive plant or wildlife species are not expected as a result of the proposed Lifeguard Facility. Potential impacts should be avoided or minimized by the following measures:

Design Measures

Construct the Lifeguard Facility entirely within the current developed footprint of the campground. No changes to bluff or cobble beach/intertidal sand habitats.

Minimize the footprint of the Lifeguard Tower within Public Safety Requirements and guidelines specified by the American Disabilities Act.

Minimize the impermeable surfaces associated with the project.

Control and treat or filter all runoff emanating from newly constructed built or paved surfaces prior to day lighting on the beach.

All runoff shall be released to areas that will not accelerate bluff erosion (e.g., avoid piping or any release of storm water on or near erodable bluffs).

Site landscaping shall be limited to native species that occur within the Coastal Areas of San Diego County. Any new plant material used on the site shall be of local genetic stock (i.e., the Central Coastal San Diego). No permanent irrigation shall be used in the site landscaping.

During construction provide fencing along the construction limits of work that would reduce potential for losses of reptiles and small mammals. At night or non-working days cover or provide escape routes for any footings or other holes that may trap small mammals or reptiles.

Minimize reflective surfaces within the structure to reduce or eliminate potential for sensitive shorebird, raptor or other bird collisions with the structure.

Construction Monitoring Measures

Construction noise should not exceed a sound level of 60 decibels or the ambient noise level (measured as an hourly average) below the bluff (at the cobble beach/intertidal sand habitat) or at the San Elijo Lagoon mouth. If short term increases in noise are unavoidable, a biological monitor shall monitor whether or not sensitive species behavior is altered or disturbed and recommend avoidance measures.

Provide a biological monitor with sound meter at the beginning of construction to measure noise.

Provide a biological monitor when grading or loud equipment is present to record effect on visiting shorebirds and, if necessary, suspend construction activities to prevent take of any listed or sensitive species. This shall consist of several days during site grading and then at least one weekly visit until project completion.

Provide a biological monitor during ground breaking/grading to document presence or absence of silvery legless lizard and to relocate any if present.

Provide biological monitor or construction supervisor to insure proper installation and maintenance of best management practices (erosion control devices, etc.).

V. CULTURAL RESOURCES.

ENVIRONMENTAL SETTING

Ethnography:

This project is in the known tribal territory of the Ipai/Tipai, also known as Kumeyaay, also previously known as Diegueño. This Yuman speaking group had a fairly large geographical zone in which they lived that stretched from San Luis Rey River, south to below Ensenada, and east to the Sand Hills beyond Imperial Valley. This name refers to several semi-nomadic bands of numerous clans that were recruited into the Mission San Diego. Ipai is from the Hokan stock of languages which are one of the oldest languages in California (Shiple 1978:81). Later a branch mission at Santa Ysabel housed about 450 California Indians (Shiple 1978:595; Engelhardt 1920:170).

San Elijo State Beach is within the ethnographic territory of the Kumeyaay (previously called the Diegueño Band of Mission Indians, and divided into the Ipai, Tipai, and Kamia). Kumeyaay territory included a vastly varied terrain, ranging from coastal beaches and lagoons, across the mountains, and down into the arid desert. The Kumeyaay were mainly hunters and gatherers, making seasonal rounds to take advantage of various resources. However, they had also developed horticultural/agricultural techniques including burning, seed broadcasting, transplanting, and planting (Bean and Lawton 1973; Gee 1972; Luomala 1978; Shipek 1982). Kumeyaay women used pottery bowls, pots, and jars; baskets; net bags; digging and gathering

sticks; manos and metates; mortars and pestles; and various wood, fiber, stone, shell, and bone utensils for collecting and processing vegetal foods and materials (Kroeber 1976:722-723; Luomala 1978). Terrestrial hunting was typically done with bow and arrow, throwing stick, or net. Brush burning to scare up and drive game like rabbits was also used (Bean and Lawton 1973; Gee 1972; Gifford 1931:26; Luomala 1978:601). Bows were made of mesquite, screwbean, or willow with a sinew string and arrows were made of arrowweed and/or cane with a wooden or stone point that was attached by sinew (Gifford 1931:28).

Culture:

The Kumeyaay were organized into autonomous bands with a hereditary (patrilineal) clan chief as well as at least one assistant chief (Luomala 1978:597). Each band had a central primary village and a number of outlier homesteads located at small water sources, springs, or at the mouths of secondary creeks (Shipek 1982). Campsites were selected for accessibility to water, drainage, availability of boulder outcrops or other natural protection from weather and ambush, and the abundance of flora and fauna (Luomala 1978:597). Kumeyaay structures varied by region and use. The more permanent dwellings were domed or gabled, with a slightly sunken floor, and were constructed of a tied-pole framework overlain with brush thatch and sometimes a mud and grass covering (Kroeber 1976:721; Luomala 1978:597). Kroeber estimated that the Diegueño population was about 3,000 based on mission data from the San Diego Mission (1925:712). Due to their mobile lifestyle and poor records any systematic population estimate is difficult to determine. Other researchers have estimated that 10,000 Kumeyaay were living at the time of Spanish arrival in this area (Shipek 1986:16-17). Another researcher Carrico calculated that the number was far larger based on number of known villages and an estimate of individuals in each village. He calculated a figure of about 17,000 in about 1769 (Carrico 1986:8).

No list exists of known prehistoric settlements. However, some villages known from ethnographic sources have been found in archeological investigations (Carrico 2003). Often villages were only campsites. In most cases, large communal villages were not as common in Kumeyaay territory as in others. This often meant that more clans met there instead of at their normal campsite (Shiple 1978:597). Campsites were chosen by means of access to water, food resources, and/or protection offered at the location.

The Ipai cremated their dead after a mourning ceremony of several days. Most of the deceased's possessions were buried with them. There often were funeral image dolls that were made as representative of the deceased and a ceremony that involved elaborate gift exchanges were held about one year after an individual's death. The body and its possessions were burned on a pyre over a pit (Luomala 1978:603). After the cremation of the body, the ash, bones, and unburned fragments of possessions were gathered up and placed in a pottery jar that was then capped and buried or hidden among remote rocks (Kroeber 1976:716; Luomala 1978:603).

The Diegueño is the only California Indian tribe known to have a color direction symbolism (Kroeber 1925:717). They recognized east as white, west as black, north as red, and south as blue-green. East was also the ceremonial direction for their shelters and doorways. The

Diegueño calendar had six divisions recognizing different seasons (Kroeber 1925:718). The Diegueño calendar is an exact duplicate of the Zuni calendar (Kroeber 1925:718). Whether this similarity is due to the obvious logic in the use of solstices or some sort of cultural dispersion between the two is unknown. This was no doubt based on a lunar calendar, with fixed points at the solstices.

Oak acorns were one of the staple foods of the Ipai. Seeds of grass, sage, pigweed, chia, flax, buckwheat, mesquite, and others were ground into flour to make gruel or bread. Fresh foods were available seasonally including fruits, berries, lettuce, roots, cactus, elderberry. People harvested these foods as they became available. Small mammals like rabbits were a staple as well as deer. Sometimes larger game was hunted by the proficient hunter. Hunters avoided women, studied their dreams, fasted, and avoided corpses prior to going out to hunt. Fish were hunted where available. Many birds were hunted. Rodents provided the substantial portion of meat.

Clothing was minimal; children and men went naked and women wore one- or two-piece bark or braided fiber aprons (Luomala 1978:599). In the winter, robes of rabbitskins, willowbark, or buckskin were used (Gifford 1931:32-33; Luomala 1978:599). Although the Kumeyaay usually went barefoot, agave-fiber sandals were used for traveling over rough or thorny terrain (Kroeber 1976:721). Women wore twined or coiled basketry caps and the men wore coiled caps (Kroeber 1976:721; Luomala 1978:599). Other adornments included bone, shell, or stick ornaments for nose or ear piercings, shell bead necklaces, and shell pendants (Gifford 1931:37-38; Luomala 1978:599). Hair was worn long with bangs for both men and women, except when it was cut short for mourning (Gifford 1931:36-37; Kroeber 1976:721; Luomala 1978:559, 603). Tattooing was practiced by both sexes, but may have been more prevalent among women due to its place as part of the adolescence ceremony for girls (Gifford 1931:35-36; Kroeber 1976:721). However, Crespi noted most of the men were painted, whether that meant actual tattooing or applied pigment paint is unknown (Brown 2001: 253). Body piercing (ears and nasal septum) was also practiced and face painting was used as another method of personal adornment (Brown 2001; Gifford 1931:34-35; Luomala 1978:599).

The Ipai and Western Kumeyaay practiced shamanism, utilizing the toloache (*Datura*) initiation customs that had been learned from the Luiseños and Gabrielinos to the north; while the Eastern Kumeyaay/Kamia practiced the system of song-myth cycles that came from the Colorado River region (Heizer and Whipple 1971). Items such as stone, cane, or ceramic pipes; pottery, tortoise shell, gourd, and deer-hoof rattles; and crescentic stones were part of ceremonial rituals (Gifford 1931; Kroeber 1976; Luomala 1978).

The Ipai practiced dancing and singing during ritual ceremonies (Luomala 1978: 604-605). These often took many forms. Betting and games were often done for recreation at certain ceremonies. The most common ceremonies were the Fire ceremony, Eagle Dance, and the Whirling Dance. There was also an elaborate ritual and ceremony accompanying the death of a tribal member. This often included a mourning ceremony.

The Kumeyaay seemed to have a complex pattern of land ownership, with some public lands and some private land. They had a network of trails, which belonged to the Kumeyaay people (Shibley 1982:302). Water was open to all, but larger clans could claim resources in a weaker

clan's territory (Luomala 1978:597). However, despite many of the complex social and religious aspects of their culture, they never evolved into a chiefdom state, like the Chumash.

Spanish Period:

After the Portola Expedition of 1769 and the establishment of Missions San Diego de Alcala in 1769 and San Luis Rey in 1798, the missions recruited local Native Americans into these missions. However, almost from the initial establishment of the mission in San Diego, the Kumeyaay offered resistance to the presence of the Spanish on their land and the assimilation of the natives into the Spanish society. This process changed the lifestyle of California Indians forever. Once recruited into the mission system, the California Indians no longer were free people. They suffered at the hands of the Spanish from tough working conditions, poor diet, over crowding, punishment, and rampant diseases (Castillo 1978:100-104). What transpired was a long period of resistance to the Spanish presence and control. This rebellion took on many forms from active to passive resistance. Fugitism, work slow-downs, abortion, infanticide, and rebellion were the most common forms of their resistance. Finally, often violence was deemed necessary. The most dramatic example of these was the revolt at La Purisima mission in 1824. Also the burning of Mission San Diego and the killing of a priest in 1775, interfered with the smooth operation of the mission. Sometimes neophytes attempted to poison priests and soldiers. There were also many unsuccessful revolts at several missions.

The Kumeyaay were first recruited in mission San Diego and later into Mission San Luis Rey in Oceanside. At first recruitment of the natives was not successful in San Diego. Almost immediately the Kumeyaay resisted the Spanish system of colonization. There were few baptisms and few neophytes available for labor as the stores of the church could not feed the neophytes. It was almost two years before the first baptism at mission San Diego. The fact that the San Diego neophytes were allowed to continue to live in their native villages might have added to the dilemma. Conflict and raiding became regular occurrences. This was a common problem throughout the life of Mission San Diego. However, it became worse after secularization (Engelhardt 1921). The Mexican government attempted to give the neophytes their freedom after secularization, but it resulted in anarchy, chaos, and mis-administration of the missions.

Local Kumeyaay were recruited from two major villages into the San Luis Rey mission. They came from the villages of *Quechinga* and *Pumusi* (Engelhardt 1921). No doubt they were recruited from other native villages as well, such as inland villages like *Pala*. Specific details are lacking as the mission registers are lost. It is clear that the mission system and the recruitment of California Indians constituted a specific part of the Spanish plan for permanent occupation of California. The goal of the missions was to create self-supporting and law abiding subjects of the Spanish empire (Engelhardt 1921:296). The missionary fathers managed to bring thousands of converts, using mostly common sense and leading by example, into the mission. This was especially true at mission San Luis Rey. The fathers were more successful at recruiting into mission San Luis Rey as within six months they had baptized 210 neophytes and 214 lived at the mission (Engelhardt 1921:14). Yet despite their powers of persuasion, a culture of people ceased to exist by the time of secularization of this mission in 1833. This was due to things beyond their knowledge: like modern notions of disease control, infirmary, and adequate care and medicine. While a few continued to live by traditional methods for a few years, it wasn't long until these villages were disbanded and the inhabitants scattered to different areas.

Previous Work:

Previous work in the area is inconclusive. Early surveys in the 1920's led to the recording of several archeological sites in the area. These included one significant site in the area: W-80 a small dense shell midden. Portions of this site still exist. This site is about ¼ mile away from the current APE of the project and is not situated within San Elijo State Beach. The other nearest site, are the foundations for a Kelp factory in the same location as W-80.

Historic

The Main Lifeguard Tower is associated with the park's earliest development between 1966 and 1967. It was one of at least ten buildings and structures constructed between 1966 and 1967 that date back to San Elijo State Beach's earliest development. The park was created to provide public access to the beach, which contains one of the best surfing spots in Southern California: Cardiff Reef. Located just off the San Elijo Lagoon estuary outlet, the reef offers a consistent right and left surf break, which has attracted local and international world-class professional and amateur surfers. Because of the beach's attraction, and dangers (a particularly nasty rip current at times), the State was naturally required to provide more than adequate lifeguard services.

Located on a high bluff, the tower offers a commanding view of the Cardiff Reef break, as well as the beach to Sea Cliff Park to the north and Cardiff State Beach to the south. The tower's design and construction, using volumetric geometric shapes and modern building materials, capped by an angular hipped roof cab, exemplifies mid-1960s Southern California lifeguard tower design. The tower served a very important public safety role, where supervising State lifeguards and other park staff oversaw the operation and coordination with and between the other smaller lifeguard towers along the shoreline. The structure also served as a primary first aid station for beach visitors.

In the 39 years since its completion, however, the dramatic change in the role and responsibilities of lifeguards has placed severe limitations on the tower's ability to provide for the public's safety. The need to cram more advanced communications and life-saving equipment, and the staff to operate them, has limited both the upper cab and lower storage area's usefulness. In addition, the integration of men and women as lifeguards has added other constraints to the present tower's usefulness: the need for separate storage and locker rooms for both sexes. The structure is also inadequate for training and office space.

Historically, the present lifeguard tower is not old enough to meet the 50-year requirement for consideration for placement on either the California or National registers. Nor is there enough historical or architectural research information available to suggest that it has any exceptional merit. All of which is moot, because the encroaching cliff erosion is close to undermining the tower's stability. Vertical cracks in the exterior masonry walls are harbingers of the tower's imminent collapse.

Likewise, there are no historic buildings or structures located within the proposed project's A.P.E. The closest potential historical resources are the railroad right-of-way and the Coast Highway, which run parallel to the park's eastern boundary. The former dates back to 1882, while the latter to 1910. However, both have undergone extensive modifications through

upgrades and the introduction of modern construction materials that have reduced their historical integrity to where they just represent their historic routes. The proposed demolition of the Main Lifeguard Tower would not constitute an adverse effect on these two potential historic resources.

A few hundred yards southeast of the project site are the ruins of a former kelp processing plant. Built by local entrepreneur Clarence Cole in 1912, the plant stood on a bluff overlooking San Elijo Lagoon, between the railroad right-of-way embankment and San Elijo Avenue. It was used to process seaweed for its food and industrial content. No longer extant, sections of the plant's concrete foundation are still visible.

Another historic resource associated with Cardiff's early development is the Cardiff Mercantile Company Building. Located southeast of the project site, on the corner of Chesterfield Drive and San Elijo Avenue, this two-story Mediterranean Revival style commercial building was the community's first general store.

	<u>POTENTIALLY SIGNIFICANT IMPACT</u>	<u>LESS THAN SIGNIFICANT WITH MITIGATION</u>	<u>LESS THAN SIGNIFICANT IMPACT</u>	<u>NO IMPACT</u>
WOULD THE PROJECT:				
a) Cause a substantial adverse change in the significance of a historical resource, as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Cause a substantial adverse change in the significance of an archaeological resource, pursuant to §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION

a) The proposed demolition of the Main Lifeguard Tower at San Elijo State Beach would not have any adverse effect on a potential historic resource within its A.P.E., or any of the fore-mentioned potentially eligible historic resources within its immediate vicinity.

b-c) Eight auger test units were excavated in the project area and no cultural material was recovered except for one piece of modern plastic. No historic buildings or artifacts are present at the project site.

MITIGATION MEASURE CULTURAL
No mitigation necessary

VI. GEOLOGY AND SOILS.

ENVIRONMENTAL SETTING

The project area is in the Peninsular Ranges Geomorphic Province. The portion of the province in San Diego County that includes the project area consists generally of uplifted and dissected Tertiary and Quaternary age sedimentary rock. There are fault systems located northeast and west of the project site (Please refer to the 2005 Geotechnical Evaluation, San Elijo State Beach, Replace Lifeguard Headquarters Project, Ninyo & Moore). The campground is built on top of and adjacent to coastal bluffs composed of Eocene Delmar Formation with no overlying terrace deposits. Most of the Delmar Formation is sandy claystone interbedded with coarse-grained sandstone. The beach level is composed of sand and cobbles. Elevations at the project site range from approximately 14 feet above Mean Sea Level (MSL) to approximately 27 feet above MSL. There is fill on the project site to a depth of approximately 5.5 feet that generally consists of silty fine sand. The potential for damage from Tsunami is moderate at the site location. No deep-seated landslides were mapped or observed to underlie the proposed site. The bluff erosion at the existing tower site is due to a combination of weak and fractured bedding within the Delmar Formation, storm enhanced wind and waves, and surficial rain water run-off. Although bluff erosion may occur rapidly during a heavy rainfall winter, the average rate of retreat is approximately 0.4-foot per year.

	<u>POTENTIALLY SIGNIFICANT IMPACT</u>	<u>LESS THAN SIGNIFICANT WITH MITIGATION</u>	<u>LESS THAN SIGNIFICANT IMPACT</u>	<u>NO IMPACT</u>
WOULD THE PROJECT:				
a) Expose people or structures to 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.)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1997), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste disposal systems, where sewers are not available for the disposal of waste water?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

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

DISCUSSION

a-e) The project will be constructed to current design standards to reduce, eliminate or substantially reduce the risk of loss for the design life of the project (50 years). There is little risk of landslide but potential risks due to southern California’s active faults and the potential for liquefaction at the site. Measures will need to be incorporated into the design, particularly the landscape design to reduce the effects of erosion, particularly the effects caused by burrowing and foraging of the California ground squirrels onsite. There is some danger that the demolition and removal of the existing Tower will increase the bluff instability.

f) Although no paleontological resources were discovered during the geotechnical borings and archaeological auger testing, such resources have been found nearby at Cardiff State Beach. Should paleontological resources be found during excavation, work should be redirected until a qualified paleontologist evaluates the resource and recommends a course of action for salvaging the resource.

MITIGATION MEASURE GEOLOGY
Implement design measures that discourage burrowing and foraging by California ground squirrel (for example minimizing hardscapes, construct deep footings on edges of paved or concrete surfaces, avoid riprap or railroad-tie steps or access ways, incorporate critter-proof trash receptacles, provide signage/interpretive panels to discourage feeding, etc.)
Implement recommended design standards based on the geotechnical report and current codes. Incorporate “best management” practices, including dust and erosion controls.
A State Park biologist or archaeologist will monitor all excavation for paleontological resources. Should paleontological resources be found during excavation, work shall be redirected to another location until a qualified paleontologist can evaluate the resource and recommend a course of action for salvaging the resource.

VII. HAZARDS AND HAZARDOUS MATERIALS.

ENVIRONMENTAL SETTING

The site is clean of hazardous substances with the exception of the potential for lead and asbestos exposure during the demolition of the existing lifeguard tower.

<u>POTENTIALLY SIGNIFICANT IMPACT</u>	<u>LESS THAN SIGNIFICANT WITH MITIGATION</u>	<u>LESS THAN SIGNIFICANT IMPACT</u>	<u>NO IMPACT</u>
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WOULD THE PROJECT:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials, substances, or waste into the environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d) Be located on a site which is included on a list of hazardous materials sites, compiled pursuant to Government Code §65962.5, and, as a result, create a significant hazard to the public or environment? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e) Be 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? If so, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f) Be located in the vicinity of a private airstrip? If so, would the project result in a safety hazard for people residing or working in the project area? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| h) Expose people or structures to a significant risk of loss, injury, or death from wildland fires, including areas where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

DISCUSSION

a– h) The campground was renovated in 2000 and is clean of hazardous substances with the exception of the small amounts of material that may be carried into the campground on the personal vehicles and equipment of persons staying at the campground. During demolition of the existing tower, commonly used construction agents for a building of that era were lead and asbestos. Should these materials be present, they will be removed according to accepted construction and demolition protocols. The project will improve public safety and emergency response and the risk of fire is nominal due to the ocean environment and sparse vegetation.

MITIGATION MEASURE HAZMAT
<ul style="list-style-type: none"> ▪ Demolition of existing Lifeguard Tower will follow established protocols for potentially hazardous substances, including lead and asbestos.

VIII. HYDROLOGY AND WATER QUALITY.

ENVIRONMENTAL SETTING

San Elijo State Beach is heavily developed. The campground development, roads, walkways, and buildings have capped much of the soil with impermeable material. Therefore, runoff is much greater than it would be under natural conditions. Drainage from the campground is concentrated in drains and transported down the bluffs in steel culverts. In general, the natural topography has not been altered and drainage from outside the Park is carried in a storm drain parallel to the beach and south to the San Elijo Lagoon outlet. Groundwater seeps directly out of the ocean facing bluffs and causes accelerated weathering. This seepage may be caused by irrigation of plants at the campground and in the adjacent community to the north. Groundwater movement downward is blocked by clay layers within the Delmar Formation and moves laterally along the top of the clay and exits the bluffs at the ocean. This seeping is not as present at the site of the existing lifeguard tower because irrigation is minimized at this section of the Park.

	<u>POTENTIALLY SIGNIFICANT IMPACT</u>	<u>LESS THAN SIGNIFICANT WITH MITIGATION</u>	<u>LESS THAN SIGNIFICANT IMPACT</u>	<u>NO IMPACT</u>
WOULD THE PROJECT:				
a) Violate any water quality standards or waste discharge requirements?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge, such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level that would not support existing land uses or planned uses for which permits have been granted)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river, in a manner which would result in substantial on- or off-site erosion or siltation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in on- or off-site flooding?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f) Substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Place housing within a 100-year flood hazard area, as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map, or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) Place structures that would impede or redirect flood	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

flows within a 100-year flood hazard area?

- i) Expose people or structures to a significant risk of loss, injury, or death from flooding, including flooding resulting from the failure of a levee or dam?
- j) Result in inundation by seiche, tsunami, or mudflow?

DISCUSSION

a-j) Because of the sensitivity of the site and nature of the coastal bluffs and ocean, water quality and drainage issues are extremely important. The design of the new facility and the corresponding landscaping and other amenities incorporate the need to reduce California ground squirrel burrowing, irrigation, and other effects on the acceleration of the bluff erosion. Additionally, best management practices for water quality control, both for operations and construction, will be implemented. Runoff from the wash down area and parking areas will be treated with a sand trap and either an oil/biofilter or low-flow system shall be installed. At this time, two options are under consideration for the bluff top area where the existing facility is located. A concern is that too much vibration during demolition may increase the bluff's instability so the option of leaving the footings in place and capping them is still under consideration. The other option would be to remove the footings and incorporate native plants to slow erosion. This option would have the advantage of removing hard structures that the ground squirrels utilize to burrow under.

MITIGATION – HYDOLOGY
Best Management Practices (BMPs) including the use of sandbags, silt fencing, filter fabric, sand traps, oil or biofilters, low-flow systems, limited temporary irrigation, and other accepted methods for reducing erosion and improving water quality shall be implemented during project construction and operations.

IX. LAND USE AND PLANNING.

ENVIRONMENTAL SETTING

The project site is located between the Pacific Ocean and South Coast Highway 101 in the community of Cardiff-by-the Sea in the City of Encinitas and subject to the Encinitas Local Coastal Plan. It is located entirely within San Elijo State Beach and subject to the 1984 San Diego Coastal State Park System General Plan, Volume 6 – San Elijo State Beach. Nearby land uses include a residential neighborhood and community park east of South Coast Highway and the railroad tracks, directly across from the site. The Cardiff-by-the Sea Specific Plan is currently in the planning for the City of Encinitas. This area contains a mix of commercial, residential and institutional uses and is located to the northeast of the project site, east of South Coast Highway 101. The Self Realization Fellowship, a small community park, and mixed residential and commercial uses are north of the campground, west of South Coast Highway 101. South of the project site is Cardiff State Beach and a row of restaurants along South Coast Highway 101. The San Elijo Lagoon County Park is located to the southeast of the project.

	<u>POTENTIALLY SIGNIFICANT IMPACT</u>	<u>LESS THAN SIGNIFICANT WITH MITIGATION</u>	<u>LESS THAN SIGNIFICANT IMPACT</u>	<u>NO IMPACT</u>
WOULD THE PROJECT:				
a) Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Conflict with the applicable land use plan, policy, or regulation of any agency with jurisdiction over the project (including, but not limited to, a general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION

a-c) The project does not introduce a substantial new use or change the existing land use. It is consistent with the Park General Plan and subject to the City of Encinitas Local Coastal Plan. The proposed lifeguard headquarters is located totally within the San Elijo State Beach campground, a highly used and developed recreation area, and replaces the existing lifeguard headquarters. The proposed project will be compatible with the surrounding land use and provide crucial public safety facilities for the campground and park visitors.

X. MINERAL RESOURCES.

ENVIRONMENTAL SETTING

Because the project site is within a highly visited State Beach, there is no active resource extraction located on-site nor is there expected to be any in the future. Sand from natural bluff erosion provides an important natural mineral resource to the beach and coastal environment.

	<u>POTENTIALLY SIGNIFICANT IMPACT</u>	<u>LESS THAN SIGNIFICANT WITH MITIGATION</u>	<u>LESS THAN SIGNIFICANT IMPACT</u>	<u>NO IMPACT</u>
WOULD THE PROJECT:				
a) Result in the loss of availability of a known mineral resource that is or would be of value to the region and the residents of the state?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION

a-b) Because natural bluff erosion provides a needed source of beach sand, the project has been designed to allow the bluff to retreat over the 50-year life of the building, in compliance with the Park General Plan and coastal erosion policy.

XI. NOISE.

ENVIRONMENTAL SETTING

The site contains ambient noise levels up to 65-70 dba, depending on the level of surf, human, and traffic activity. The human activity levels will generally be higher during the peak months and middle of the day. Traffic noise would be higher during peak traffic hours and the summer season, and surf noise would be higher as storm-generated swells reach the shoreline. There are sensitive receptors located nearby for construction noise and they include the visitors to the State Beaches, campers in the campground, shorebirds on the beach and lagoon mouth, and the residents and community park users located across the South Coast Highway 101.

	<u>POTENTIALLY SIGNIFICANT IMPACT</u>	<u>LESS THAN SIGNIFICANT WITH MITIGATION</u>	<u>LESS THAN SIGNIFICANT IMPACT</u>	<u>NO IMPACT</u>
WOULD THE PROJECT:				
a) Generate or expose people to noise levels in excess of standards established in a local general plan or noise ordinance, or in other applicable local, state, or federal standards?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Generate or expose people to excessive groundborne vibrations or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c) Create a substantial permanent increase in ambient noise levels in the vicinity of the project (above levels without the project)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) Create a substantial temporary or periodic increase in ambient noise levels in the vicinity of the project, in excess of noise levels existing without the project?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e) Be 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? If so, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be in the vicinity of a private airstrip? If so, would the project expose people residing or working in the project area to excessive noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION

a-d) There are no significant noise impacts associated with the operation of the new facility. Demolition of the existing lifeguard headquarters and construction and grading for the new building will introduce temporarily high noise levels up to 100 dba within 30 feet of the construction site. While it is not expected that the noisiest activities such as pile-driving (if needed) and jack-hammering would be continuous, they may last from several days to

several weeks. Large vehicles and other construction operations are less noisy but still in the 80 to 90 dba range at a distance of about 30 feet. The construction will avoid the summer season and weekends to reduce impacts to visitors. Residential noise standards will be incorporated into the project specifications and include starting work after 7 AM on weekdays and completing work by 7 PM, starting work after 8 AM on Saturdays and completing by 7 PM, and no work on Sundays. A biological monitor will ensure that noise does not adversely affect shorebirds and campers will be redirected away from the construction site during the week.

e-f) There are no airstrips near the project site, therefore there is no impact.

MITIGATION MEASURE NOISE
<ul style="list-style-type: none"> ▪ The construction for the project will avoid the summer season and weekends to reduce impacts on visitors. Residential noise standards will be incorporated into the project specifications and include starting work after 7 AM on weekdays and completing work by 7 PM, starting work after 8 AM on Saturdays and completing by 7 PM, and no work on Sundays. A biological monitor will ensure that noise does not adversely affect shorebirds and campers will be redirected away from the construction site during the week.

XII. POPULATION AND HOUSING

ENVIRONMENTAL SETTING

The city of Encinitas has a population of 62,815 and San Diego County a population of 3,066,820. The area near the park is heavily urbanized except for the San Elijo Lagoon and County Park.

	<u>POTENTIALLY SIGNIFICANT IMPACT</u>	<u>LESS THAN SIGNIFICANT WITH MITIGATION</u>	<u>LESS THAN SIGNIFICANT IMPACT</u>	<u>NO IMPACT</u>
WOULD THE PROJECT:				
a) Induce substantial 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)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION

a-c) The project will only replace a small public service facility in a existing State Beach and not effect either population or housing because no new infrastructure will be constructed for such uses.

XIII. PUBLIC SERVICES.

ENVIRONMENTAL SETTING

Public services at San Elijo State Beach are primarily provided by the California Department of Parks and Recreation (DPR). DPR lifeguards and rangers promote public safety and law enforcement on the beach and in the campground. DPR maintenance staff services the Park infrastructure and cleans the restrooms and campground area. City services, such as fire protection, are available nearby.

	<u>POTENTIALLY SIGNIFICANT IMPACT</u>	<u>LESS THAN SIGNIFICANT WITH MITIGATION</u>	<u>LESS THAN SIGNIFICANT IMPACT</u>	<u>NO IMPACT</u>
WOULD THE PROJECT:				
a) Result in significant environmental impacts from construction associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION

a) The proposed project replaces a badly needed lifeguard headquarters at one of the most popular beach campgrounds in southern California. It would provide a needed facility but would require a temporary replacement during construction because the emergency services and communication are essential public services. An office trailer could be rented during the construction period to provide a temporary lifeguard support facility but the lifeguards would need to temporarily increase vehicular patrols for visual contact with the water.

Mitigation – Public Services

A temporary office trailer should be provided for lifeguard support and emergency communications after demolition of the existing building.

XIV. RECREATION.

ENVIRONMENTAL SETTING

The setting is within a very actively used campground at a State Beach. The campground and beach are heavily used during the weekends and summer months. Annual attendance at San Elijo State Beach was 961,316 visitors in 2005. However, because of the high use at the site, the presence of dangerous rip currents, and the condition of the existing building, the need to replace the lifeguard headquarters is urgent. For additional information, please refer to Section 2.2. The site chosen for the new lifeguard headquarters building is in an undeveloped area behind the comfort station, just down coast from the camp host camp site.

	<u>POTENTIALLY SIGNIFICANT IMPACT</u>	<u>LESS THAN SIGNIFICANT WITH MITIGATION</u>	<u>LESS THAN SIGNIFICANT IMPACT</u>	<u>NO IMPACT</u>
WOULD THE PROJECT:				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION

a-b) Once built, the project will provide improved services to the public. All adverse recreational impacts would occur during construction. Construction should not occur during the summer season and the site should be secured at the close of the working day and on weekends. Although no existing campsites will be lost for the building site, one campsite may be unavailable during construction if it is utilized for a temporary lifeguard headquarters. This could be for as long as 2 years. Additionally, construction noise would adversely affect the camping experience for those that camp during the off season near the new facility. This could be avoided by assigning visitors to campsites away from the construction area.

Mitigation – Recreation

Construction should not occur during the summer season or on busy weekends and campers should be placed in locations away from the site during weekdays. The construction site should be secured from visitors at the close of each working day and on weekends.

XV. TRANSPORTATION/TRAFFIC.

ENVIRONMENTAL SETTING

The site is within a State Park campground that is adjacent to South Coast Highway 101, a heavily traveled local and regional transportation corridor. This route is a 4-lane highway with turning lanes. The Park entrance is located near the middle of the Park, well outside the project area. South Coast Highway 101 is heavily traveled during the summer season and by commuters during the peak hours. It also serves as an alternate transportation corridor for Interstate 5, located several miles to the east.

	<u>POTENTIALLY SIGNIFICANT IMPACT</u>	<u>LESS THAN SIGNIFICANT WITH MITIGATION</u>	<u>LESS THAN SIGNIFICANT IMPACT</u>	<u>NO IMPACT</u>
WOULD THE PROJECT:				
a) Cause a substantial increase in traffic, in relation to existing traffic and the capacity of the street system (i.e., a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Exceed, individually or cumulatively, the level of service standards established by the county congestion management agency for designated roads or highways?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Cause a change in air traffic patterns, including either an increase in traffic levels or a change in location, that results in substantial safety risks?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Contain a design feature (e.g., sharp curves or a dangerous intersection) or incompatible uses (e.g., farm equipment) that would substantially increase hazards?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Result in inadequate parking capacity?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION

a-g) The proposed project replaces an existing facility, therefore the increase in number of trips would be nominal. Because of the increased size of the support facility there may be 10 to 15 more trips per day during normal operations. Access would continue to be through the existing Park entrance from South Coast Highway 101. Training may occur during the off season but would be limited to approximately 30 vehicles or less. Parking for training sessions could utilize nearby camp sites without adversely affecting visitor access because it would occur during the week in the off season.

XVI. UTILITIES AND SERVICE SYSTEMS.

ENVIRONMENTAL SETTING

Because of its urban setting, the existing site is served by all utilities including water, sewer and electricity. Gas is located nearby.

	<u>POTENTIALLY SIGNIFICANT IMPACT</u>	<u>LESS THAN SIGNIFICANT WITH MITIGATION</u>	<u>LESS THAN SIGNIFICANT IMPACT</u>	<u>NO IMPACT</u>
WOULD THE PROJECT:				
a) Exceed wastewater treatment restrictions or standards of the applicable Regional Water Quality Control Board?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Would the construction of these facilities cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Would the construction of these facilities cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Have sufficient water supplies available to serve the project from existing entitlements and resources or are new or expanded entitlements needed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) Result in a determination, by the wastewater treatment provider that serves or may serve the project, that it has adequate capacity to service the project's anticipated demand, in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) Comply with federal, state, and local statutes and regulations as they relate to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

DISCUSSION

a-g) The project replaces an existing building and is not expected to have an adverse affect on utility or service systems. The San Elijo campground was renovated in 2000 so the utility connections should have been brought up to current codes at that time. Any increase in capacity demand for the new lifeguard headquarters facility would be nominal and all services are available at the site to service the existing comfort station.

CHAPTER 4 MANDATORY FINDINGS OF SIGNIFICANCE

	<u>POTENTIALLY SIGNIFICANT IMPACT</u>	<u>LESS THAN SIGNIFICANT WITH MITIGATION</u>	<u>LESS THAN SIGNIFICANT IMPACT</u>	<u>NO IMPACT</u>
WOULD THE PROJECT:				
a) Does the project have the potential to 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, reduce the number or restrict the range of a rare or endangered plant or animal?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) Have the potential to eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means the incremental effects of a project are considerable when viewed in connection with the effects of past projects, other current projects, and probably future projects?)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d) Have environmental effects that will cause substantial adverse effects on humans, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

DISCUSSION

- a) The proposed project replaces and expands an existing facility located within a developed coastal area. It is close to the San Elijo Lagoon mouth and the intertidal zone where sensitive shorebirds may be present. No adverse effects to sensitive species are anticipated during operation of the facility and a biological monitor will ensure that no adverse effects occur during construction.
- b) No cultural resources are present on the site.
- c) Due to the close proximity of sensitive natural resources and the coastal environment, any construction may have an adverse effect on the hydrology and water quality of the area. DPR will construct the facility according to accepted protocols and standards for such an environment and the project will be reviewed by the State Water Resource Quality Control Board for compliance. Therefore, no cumulative adverse effects to water quality are expected.
- d) The proposed project will provide a needed public safety facility that will improve public services. It will potentially cause adverse visual effects because of the coastal environment. Sensitive design and landscaping will reduce these effects below a level of significance.

CHAPTER 5

SUMMARY OF MITIGATION MEASURES

The following mitigation measures would be implemented by DPR as part of the Project.

AESTHETICS

MITIGATION MEASURES AESTHETICS

In addition to sensitive design, DPR proposes to use building materials that are earth toned and landscaping to mitigate the view of the building. Mature existing vegetation near the building will be left in place to the greatest extent feasible.

AGRICULTURAL RESOURCES

MITIGATION MEASURES AGRICULTURAL

- None required

AIR QUALITY

MITIGATION MEASURES AIR

Standard construction protocols for dust control during demolition and grading & removal of any potentially hazardous airborne materials such as asbestos.

BIOLOGICAL RESOURCES

MITIGATION MEASURES BIOLOGY

Construct the Lifeguard Facility entirely within the current developed footprint of the campground. No changes to bluff or cobble beach/intertidal sand habitats. Minimize the footprint of the Lifeguard Tower within Public Safety Requirements and guidelines specified by the American Disabilities Act.

Minimize the impermeable surfaces associated with the project. Control and treat or filter all runoff emanating from newly constructed built or paved surfaces prior to day lighting on the beach. All runoff shall be released to areas that will not accelerate bluff erosion (e.g., avoid piping or any release of storm water on or near erodable bluffs).

Site landscaping shall be limited to native species that occur within the Coastal Areas of San Diego County. Any new plant material used on the site shall be of local genetic stock (i.e., the Central Coastal San Diego). No permanent irrigation shall be used in the site landscaping.

During construction provide fencing along the construction limits of work that would reduce potential for losses of reptiles and small mammals. At night or non-working days cover or provide escape routes for any footings or other holes that may trap small mammals or reptiles.

Minimize reflective surfaces within the structure to reduce or eliminate potential for sensitive shorebird, raptor or other bird collisions with the structure.

Construction noise should not exceed a sound level of 60 decibels or the ambient noise level (measured as an hourly average) below the bluff (at the cobble beach/intertidal sand habitat)

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or at the San Elijo Lagoon mouth. If short term increases in noise are unavoidable, a biological monitor shall monitor whether or not sensitive species behavior is altered or disturbed and recommend avoidance measures. Provide a biological monitor with sound meter at the beginning of construction to measure noise. Provide a biological monitor when grading or loud equipment is present to record effect on visiting shorebirds and if necessary suspend construction activities to prevent take of any listed or sensitive species. This shall consist of several days during site grading and then at least one weekly visit until project completion.

Provide a biological monitor during ground breaking/grading to document presence or absence of silvery legless lizard and to relocate any if present.

Provide biological monitor or construction supervisor to insure proper installation and maintenance of best management practices (erosion control devices, etc.).

CULTURAL RESOURCES

MITIGATION MEASURES CULTURAL

- None required

GEOLOGY AND SOILS

MITIGATION MEASURES GEOLOGY

Implement design measures that discourage burrowing and foraging by California ground squirrel (for example minimizing hardscapes, construct deep footings on edges of paved or concrete surfaces, avoid riprap or railroad-tie steps or access ways, incorporate critter-proof trash receptacles, provide signage/interpretive panels to discourage feeding, etc.) Implement recommended design standards based on the geotechnical report and current codes. Incorporate “best management” practices, including dust and erosion controls.

A State Park biologist or archaeologist will monitor all excavation for paleontological resources. Should paleontological resources be found during excavation, work shall be redirected to another location until a qualified paleontologist can evaluate the resource and recommend a course of action for salvaging the resource.

HAZARDS AND HAZARDOUS MATERIALS

MITIGATION MEASURES HAZMAT

Demolition of existing Lifeguard Tower will follow established protocols for potentially hazardous substances, including lead and asbestos.

HYDROLOGY AND WATER QUALITY

MITIGATION MEASURES HYDROLOGY

Best Management Practices (BMPs) including the use of sandbags, silt fencing, filter fabric, sand traps, oil or biofilters, low-flow systems, limited temporary irrigation, and other accepted methods for reducing erosion and improving water quality shall be implemented during project construction and operations.

LAND USE AND PLANNING

MITIGATION MEASURES LAND-1

- None Required

MINERAL RESOURCES

MITIGATION MEASURES MINERAL-1

- None Required

NOISE

MITIGATION MEASURES NOISE-1

The construction for the project will avoid the summer season and weekends to reduce impacts on visitors. Residential noise standards will be incorporated into the project specifications and include starting work after 7 AM on weekdays and completing work by 7 PM, starting work after 8 AM on Saturdays and completing by 7 PM, and no work on Sundays. A biological monitor will ensure that noise does not adversely affect shorebirds and campers will be redirected away from the construction site during the week.

POPULATION AND HOUSING

MITIGATION MEASURES POP-1

- None Required

PUBLIC SERVICES

MITIGATION MEASURES SERVICE-1

A temporary office trailer should be provided for lifeguard support and emergency communications after demolition of the existing building.

RECREATION

MITIGATION MEASURES REC-1

Construction should not occur during the summer season or on busy weekends and campers should be placed in locations away from the site during weekdays. The construction site should be secured from visitors at the close of each working day and on weekends.

TRANSPORTATION/TRAFFIC

MITIGATION MEASURES TRANS-1

- None required

UTILITIES AND SERVICE SYSTEMS

MITIGATION MEASURES UTIL-1

- Project will be built according to current building and health and safety code standards

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REPORT PREPARATION

CALIFORNIA DEPARTMENT OF PARKS AND RECREATION

TINA ROBINSON, ENVIRONMENTAL COORDINATOR
ASSOCIATE PARK AND RECREATION SPECIALIST
SOUTHERN SERVICE CENTER

ALEX BEVIL, HISTORIAN II
SOUTHERN SERVICE CENTER

HERB DALLAS, ASSOCIATE STATE ARCHAEOLOGIST
SOUTHERN SERVICE CENTER

RICH BURG, ASSOCIATE RESOURCE ECOLOGIST
SOUTHERN SERVICE CENTER

DARREN SMITH, ASSOCIATE RESOURCE ECOLOGIST
SAN DIEGO COAST DISTRICT

SUZY LAHITTE, PROJECT MANAGER
SOUTHERN SERVICE CENTER

RICH RISNER, ASSOCIATE LANDSCAPE ARCHITECT
SOUTHERN SERVICE CENTER

VICTOR DONATELLI, ASSOCIATE ARCHITECT
SOUTHERN SERVICE CENTER

MIKE PENNER, ASSOCIATE CIVIL ENGINEER
SOUTHERN SERVICE CENTER

MIKE BONK, GIS & GRAPHICS
SOUTHERN SERVICE CENTER

BRITTA DAHLKE, ENVIRONMENTAL SERVICES INTERN
SOUTHERN SERVICE CENTER

CHAPTER 8

PUBLIC COMMENT

The Initial Study/MND was circulated for a 30-day public review period, beginning on November 6, 2006 and officially ending on December 6, 2006. Notices or copies of the document were sent to all nearby property owners listed in the County Tax Assessor's records, the Cities of Encinitas and Solana Beach, and other interested stakeholders as well as the State Clearinghouse. Only one response was received. This response was from Native American Heritage Commission and is included, along with the DPR response, on the following pages. DPR has adequately addressed the issues raised in this comment letter.

APPENDIX A
PROJECT GRAPHICS
