

July 21, 2016

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Senior Planner
City of San Diego
Transportation and Storm Water Department, Operations and Maintenance
2781 Caminito Chollas, MS 44
San Diego, CA 92105

Subject: Master Storm Water System Maintenance Program- Soledad Canyon/Sorrento Creek and Flintkote Channel Maintenance Project Individual Historical Assessment

Dear Ms. Rom:

In conformance with the City of San Diego (City) modified Master Storm Water System Maintenance Program's (Master Maintenance Program or MMP) amended Site Development Permit (SDP) No. 1134892 and Program Environmental Impact Report (PEIR) Project No. 42891/SCH No. 2004101032, the attached *Individual Historical Assessment (IHA) Report (2014-2015 IHA)* document is submitted as part of the Substantial Conformance Review (SCR) package for the Soledad Canyon/Sorrento Creek and Flintkote Channel Maintenance Project.

Maintenance activities associated with the Soledad Canyon/Sorrento Creek (Reach 3) and Flintkote Channel (Reach 7) Maintenance Project have occurred on three occasions; emergency maintenance in 2011 and 2016 as well as routine maintenance in 2014-2015. Routine maintenance in 2014-2015 consisted of the mechanized removal of sediment, vegetation and trash and debris from the channels. Emergency maintenance in 2011 and 2016 was conducted in order to protect life and property from flood risk. The 2016 emergency maintenance specifically required repair and reconstruction of the channel's concrete lining in the southeastern portion of Reach 3.

Maintenance activities associated with the MMP have generally been conducted from September 16 to March 14 each year to avoid potential impacts to nesting birds. Formal regulatory approval and implementation of detailed protocol survey mitigation measures have allowed the City to conduct maintenance activities as-needed and weather permitting throughout the calendar year for the Soledad Canyon/Sorrento Creek and Flintkote Channel Maintenance Project. Accordingly, this 2016-2017 SCR submittal package (2016-2017 SCR) is intended to address maintenance activities that will be conducted in the 2016-2017 maintenance period, which begins September 16, 2016 and ends September 14, 2017 (2016-2017 maintenance period).

SCR package contents vary for planned and emergency maintenance activities. For planned maintenance activities, a complete technical SCR package containing an Individual Maintenance Plan (IMP), IHA, and other associated Individual Assessments (IAs) is prepared. SCR packages for emergency maintenance activities contain a focused and site-specific technical review of

environmental resources as they related to emergency conditions and maintenance activities. A complete technical SCR package for planned maintenance of the Soledad Canyon/Sorrento Creek and Flintkote Channel Maintenance Project was prepared in December 2013, and approved on January 31, 2014 for routine maintenance conducted during the 2014-2015 maintenance period (2014-2015 SCR). An SCR package that addressed emergency maintenance of the Reach 3 and Reach 7 channel areas was prepared in 2011. Emergency maintenance activities and the associated SCR package for emergency maintenance activities in 2016 only addressed Reach 3 where maintenance occurred.

Existing conditions, current historical record searches, and mitigation impacts were re-evaluated in July 2016 in order to assess conditions related to historical resources in advance of the 2016-2017 maintenance period. Historical resource conditions remain substantially similar to those described in the 2014-2015 IHA. Accordingly, this letter provides a summary technical review performed by a qualified archaeologist, of the 2014-2015 IHA as it applies to current conditions in the Soledad Canyon/Sorrento Creek and Flintkote Channel Maintenance Project area. This letter and attachments serve as the basis for SCR determination for planned maintenance work to be conducted during the 2016-2017 maintenance period as part of the Soledad Canyon/Sorrento Creek and Flintkote Channel Maintenance Project.

PROJECT HISTORY AND BACKGROUND

The Soledad Canyon/Sorrento Creek and Flintkote Channel Maintenance Project include maintenance of the Sorrento Creek and Flintkote Channels (collectively referred to hereafter as the Sorrento Valley Channels) as part of the MMP. The Sorrento Creek Channel is included on MMP Maps 11 and 12, and the Flintkote Channel is included on MMP Map 9 (City of San Diego 2011). While these maintenance channels include both concrete-lined and earthen conveyance channels, the Soledad Canyon/Sorrento Creek and Flintkote Channel Maintenance Project was developed for maintenance in the concrete-lined portions of the channels. As specified within the 2014 SCR, these areas are referred to as Reach 3 (Sorrento Creek) and Reach 7 (Flintkote Channel) respectively. Figures 2B and 3A through 3C within the 2016 Individual Biological Assessment (IBA) (2016 IBA) provide a geographical presentation of the maintenance areas of Reach 3 and 7.

Environmental permits¹ were issued by the Regional Water Quality Control Board (RWQCB), Army Corps of Engineers (ACOE), and the California Coastal Commission (CCC) in 2012 and 2013 based on the project scope, impacts, and mitigation. Appropriate construction-related Best Management Practices and concurrent wetland compensatory mitigation have been implemented as part of the comprehensive channel maintenance project.

¹ Because California Department of Fish and Wildlife (CDFW) missed the deadline to respond, the project was approved by default and no permit was issued. Therefore, the project must adhere to the project conditions as described in the CDFW and United States Fish and Wildlife Service (USFWS) applications.

PROJECT DESCRIPTION

The project area is located in Sorrento Valley adjacent to the Interstate 5 and Interstate 805 interchange within the City's Coastal Overlay Zone, Torrey Pines Community Plan, and Local Coastal Program (LCP). The project area is zoned IL-3-I (Industrial-Light) and designated for Industrial and Open Space land uses in the Torrey Pines Community Plan LCP. Reaches 3 and 7 are adjacent to the City's Multiple Species Conservation Program's Multi-Habitat Planning Area. The project area is also located within the Federal Emergency Management Agency's (FEMA) Special Flood Hazard Areas subject to inundation by the 1-percent Annual Chance Flood and 100-year floodway.

The periodic maintenance of the Sorrento Valley Channels is needed to restore the channels' flood conveyance capacity to original design condition and reduce flood risk. The maintenance activities also reduce impacts to Los Peñasquitos Lagoon from transport of sediment and trash and debris derived from sources upstream of the project area.

Maintenance of the Sorrento Valley Channels includes the mechanized removal of sediment, vegetation and trash and debris from the channels. Proposed maintenance procedures for Soledad Canyon/Sorrento Creek and Flintkote Channel Maintenance Project channel clearing activities in the 2016-2017 maintenance period remain substantially similar to procedures incorporated as part of the IMP included in the 2014-2015 SCR. The project incorporates the removal of accumulated sediment and vegetation material from Reach 3 and 7, consisting of approximately 3,304 linear feet and 3.47 acres of concrete lined channel.

CURRENT CONDITIONS

The combination of routine maintenance activities in 2014-2015, and the emergency maintenance activities in 2011 and 2016 have reduced the amount of sediment present within the Reach 3 channel maintenance areas. However, since the most recent maintenance activities, natural and anthropogenic processes in the upstream watershed have resulted in additional sediment accumulation in Reach 7. A qualified archaeologist reviewed the current conditions of the site, which indicates that site and historical resource conditions are substantially similar to conditions evaluated as part of the 2014-2015 IHA. Accordingly, the 2014-2015 IHA findings have been determined to be generally applicable to the maintenance activities for the 2016-2017 maintenance period. Specific to the Soledad Canyon/Sorrento Creek and Flintkote Channel Maintenance Project, the following conditions should be noted:


- Based on historical sediment accumulation rates within the Sorrento Valley Channels, it is expected that ongoing maintenance activities may be necessary within these channel areas.
- The 2014-2015 IHA and other portions of the 2014-2015 SCR were reviewed in July 2016 by Dudek.

- A records search was performed for Reach 3 and a ½-mile radius around Reach 3 prior to the emergency channel maintenance activities in 2016; the entirety of Reach 7 was encompassed in this search. The records search did not identify any new cultural resources that were not previously identified in the 2014-2015 IHA. No cultural resources were identified in Reach 3 or Reach 7.
- Archaeological and Native American monitors were present for removal of portions of the concrete channel in Reach 3 during emergency channel maintenance in 2016. No cultural resources were identified or impacted at that time.
- All sediments that accumulate in the concrete-lined channels of Reaches 3 and 7 have accumulated in the channels as a result of natural deposition during rainstorms since the last maintenance activities. These sediments originate off-site and are in a secondary depositional context; therefore they cannot contain intact archaeological materials.
- All maintenance areas and access routes to the channels are paved surfaces where no ground disturbance will occur.
- As no intact archaeological sites or artifacts are present in the channels, and staging/access areas will be confined to paved surfaces, there is no potential for significant impacts to historical resources.

In summary, evaluation of current conditions and review of the 2014-2015 IHA and the 2014-2015 SCR package did not identify new significant environmental impacts to historical resources that have not already been identified, addressed, and/or mitigated by the required conditions set forth in the associated SDP and PEIR. Therefore the proposed maintenance would substantially conform to the existing permit and environmental document.

Please contact me by phone (760.479.4211) or by e-mail (bcomeau@dudek.com) with questions or requests for clarification.

Respectfully,



Brad Comeau, MSc, RPA
Archaeologist
Dudek

Ms. Catherine Rom

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Attachments:

2014-2015 Individual Historical Assessment

2016 Records Search Summary