

July 25, 2016

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Transportation and Storm Water Department, Operations and Maintenance
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Subject: Master Storm Water System Maintenance Program- Soledad Canyon/Sorrento Creek and Flintkote Channel Maintenance Project Individual Water Quality 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 Water Quality Assessment Report* (2014-2015 IWQA) document is submitted as part of the Substantial Conformance Review (SCR) package for the Soledad Canyon/Sorrento Creek (Reach 3) and Flintkote Channel (Reach 7) Maintenance Project (Project).

Maintenance activities associated with the Project area (Refer to the 2016 Individual Biological Assessment [2016 IBA], Figures 3A, 3B, and 3C) have occurred on three occasions; emergency maintenance was conducted in 2011 and 2016, and routine maintenance was conducted in 2014-2015. Routine maintenance performed in 2014-2015 consisted of the mechanized removal of sediment, vegetation and trash and debris from the channels. Emergency maintenance was conducted in 2011 and 2016 in order to protect life and property from flood risk. Emergency maintenance conducted in 2016 included the removal of significant sediment and vegetation build up, particularly within the Sorrento Reach 2 and Reach 3 transition area, where the Reach 3 concrete-lined channel meets the Reach 2 earthen channel. In addition, concrete repair activities at the Sorrento (Soledad Creek) Reach 3 channel were conducted in Spring 2016. Approximately 300 feet of damaged concrete-lining and a cut off wall were removed and replaced with new structures.

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 Project. Accordingly, this 2016 SCR submittal package (2016 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).

The SCR package contents differ for planned and emergency maintenance activities. For planned maintenance activities, a complete technical SCR package containing an Individual Maintenance Plan (IMP), IWQA, and other associated Individual Assessments (IAs) is prepared. SCR packages for emergency maintenance activities contain focused and site-specific technical review of environmental resources and impacts as they relate to emergency conditions and maintenance activities performed. A complete technical SCR package for planned Project maintenance was prepared in December 2013, and approved on February 21, 2014 (2014-2015 SCR) for routine maintenance conducted during the 2014-2015 maintenance period. An SCR package that addressed emergency maintenance performed in Reach 3 and Reach 7 channel areas was prepared in 2011. For emergency maintenance conducted in 2016, maintenance activities and the associated SCR package were limited to Reaches 2 and 3.

Existing conditions, current available water quality data, and necessary mitigation requirements were re-evaluated in July 2016 in order to assess conditions related to water quality resources in advance of the 2016-2017 maintenance period. Water quality resource conditions remain substantially similar to those described in the 2014-2015 IWQA. Accordingly, this letter provides a summary technical review performed by a Professional Engineer, of the 2014-2015 IWQA as it applies to current conditions in the 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 for the Project.

PROJECT HISTORY AND BACKGROUND

The Project includes 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). As specified within the 2014-2015 SCR, these concrete-lined channels are referred to as Reach 3 (Sorrento Creek) and Reach 7 (Flintkote Channel) respectively. Figures 2B, and 3A through 3C contained in the 2016 IBA provide a geographical overview of the Reach 3 and 7 maintenance areas.

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 (BMPs) 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 and LCP. Reaches 3 and 7 are adjacent to the City's Multiple Species Conservation Program's Multi-Habitat Planning Area (MHPA). 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.

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

Proposed maintenance of the Sorrento Valley Channels includes the mechanized removal of sediment, vegetation and trash and debris from the channels. Proposed maintenance procedures for the channel clearing activities for 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 from Reaches 3 and 7, consisting of approximately 3,390 linear feet and 3.66 acres of concrete-lined channel.

CURRENT CONDITIONS

The combination of routine maintenance activities conducted in 2014-2015, and the emergency maintenance activities conducted in 2011 and 2016, have reduced the amount of sediment present within the Reach 3 channel maintenance area. However, since the most recent emergency maintenance activities conducted in Reach 3 during Spring 2016, continued natural and anthropogenic processes in the upstream watershed have resulted in the accumulation of additional sediment and a small amount of vegetation in both Reach 3 and Reach 7 (2016 IBA; Figures 3A, 3B, & 3C). Based on historic sediment accumulation rates within the Sorrento Valley Channels, it is expected that ongoing maintenance in these channel areas will be required.

Review of current conditions indicates that site and water quality resource conditions are substantially similar to conditions evaluated as part of the 2014-2015 IWQA. Accordingly, the 2014-2015 IWQA findings have been determined to be generally applicable to the proposed maintenance activities for the 2016-2017 maintenance period. Specific to the Project, the following conditions should be noted:

- Based on historic sediment accumulation rates within the Sorrento Valley Channels, it is expected that ongoing maintenance activities may be necessary in these channel areas.

- The 2014-2015 IWQA and other water quality-related portions of the 2014-2015 SCR were reviewed in July 2016 by Dudek.
- The 2014-2015 SCR indicates when maintenance is conducted in Reach 3, clear water diversions will be used to divert the dry weather flows in the channel around the phased work areas. The first clear water diversion will begin at the upstream end of the Sorrento Valley Boulevard bridge, and terminate at the downstream end of the Project (IBA; Figures 3a&3b). The flow diversion will be a high-line bypass system and consist of 4- or 6- inch pumps with 6-inch diameter hose. Diverted flows will be discharged back into the channel at the downstream end of the channel maintenance area, just past the flow diversion structure in the Reach 3 (concrete channel) area. A sediment filter bag may be placed on the end of the diversion hose to remove sediment from the diverted flows and further decrease velocity, if necessary. The exact location of the flow diversion and bypass system and sediment filter bag will be coordinated with the project biologist to minimize environmental impacts to the extent feasible.
- An approximately 300-foot section of damaged concrete-lining and cutoff wall within the channel at the southeastern end of Reach 3 has been repaired. New concrete panels and a new cutoff wall were installed.
- As required by the Regional MS4 Permit (Order No. R9-2013-001), a Water Quality Improvement Plan (WQIP) for the Los Peñasquitos Watershed Management Area (WMA) was developed by the City and other watershed stakeholders, and was accepted by the San Diego RWQCB in February 2016 (http://www.waterboards.ca.gov/sandiego/water_issues/programs/stormwater/wqip.shtml). The first year of monitoring for the WQIP has been completed, and water quality data will be available in the near future.
- A site visit to review existing site conditions and mitigation impacts was performed in June 2016 as part of the 2016 IBA. Consistent with the findings of the 2014-2015 IWQA, there is no dry weather flow present in Reach 7.
- Errata: typographical errors were noticed in the 2014-2015 IWQA, page 11 and Attachment 6. The text on page 11 erroneously states that the constituent list for water quality samples is provided in Attachment 8. The constituent list for water quality samples is actually provided in Attachment 6. Also, the second page of Attachment 6 is mislabeled as Attachment 8.

In summary, evaluation of current conditions and review of the 2014-2015 IWQA, and the 2014-2015 SCR package, as well as review of recent water quality monitoring information, did not identify new significant environmental impacts to water quality 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.

Ms. Catherine Rom

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Please contact me by phone (310.780.2959) or by e-mail (hlamberson@dudek.com) with questions or requests for clarification.

Respectfully,

Heather L. Lamberson

Heather Lamberson, PE
Senior Engineer
DUDEK



Attachments:

2014-2015 Individual Water Quality Assessment