

# Cycle Issues DRAFT



6/20/18 2:04 pm

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L64A-003B

THE CITY OF SAN DIEGO  
Development Services Department  
1222 First Avenue, San Diego, CA 92101-4154

## Project Information

**Project Nbr:** 606769 **Title:** Auburn Creek FY19Channel Maint  
**Project Mgr:** Deisher, Helene (619) 446-5223 hmdeisher@sandiego.gov



## Review Information

**Cycle Type:** 1 Submitted (Multi-Discipline) **Submitted:** 05/01/2018 Deemed Complete on 05/01/2018  
**Reviewing Discipline:** LDR-Planning Review **Cycle Distributed:** 05/01/2018  
**Reviewer:** Brunette, Mark **Assigned:** 05/07/2018  
(619) 446-5379 **Started:** 05/24/2018  
MBrunette@sandiego.gov **Review Due:** 05/30/2018  
**Hours of Review:** 1.00 **Completed:** 05/24/2018  
**Next Review Method:** Submitted (Multi-Discipline) **Closed:**  
. The review due date was changed to 06/04/2018 from 06/04/2018 per agreement with customer.  
. The reviewer has requested more documents be submitted.

## Cycle 1 - 5/24/18

<u>Issue</u>		
<u>Cleared?</u>	<u>Num</u>	<u>Issue Text</u>
<input checked="" type="checkbox"/>	1	The proposed routine maintenance of the Auburn Creek channel (MSWMP Map Nos. 70 and 76) is included in the scope of the Master Storm Water Maintenance Program (MSWMP). The scope of work described in the submitted project memo and maintenance plans substantially conforms to the requirements of SDP 1134892/2034245 for the MSWMP. LDR-Planning Review will defer to the Plan-MSCP and Plan-Environmental Review disciplines in terms of the project's consistency with the MSCP Subarea Plan and the requirements of CEQA. (New Issue)



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## Review Information

<b>Cycle Type:</b>	1 Submitted (Multi-Discipline)	<b>Submitted:</b>	05/01/2018	Deemed Complete on 05/01/2018
<b>Reviewing Discipline:</b>	Community Planning Group	<b>Cycle Distributed:</b>	05/01/2018	
<b>Reviewer:</b>	Deisher, Helene	<b>Assigned:</b>	06/06/2018	
	(619) 446-5223	<b>Started:</b>	06/06/2018	
	hmdeisher@sandiego.gov	<b>Review Due:</b>	05/30/2018	
<b>Hours of Review:</b>	0.00	<b>Completed:</b>	06/07/2018	
<b>Next Review Method:</b>	Conditions	<b>Closed:</b>		

- . The review due date was changed to 06/04/2018 from 06/04/2018 per agreement with customer.
- . The reviewer has requested more documents be submitted.
- . Your project still has 1 outstanding review issues with Community Planning Group (all of which are new).

## New Issue Group (3217326)

<u>Issue</u>		
<u>Cleared?</u>	<u>Num</u>	<u>Issue Text</u>
<input type="checkbox"/>	1	On Monday June 4, 2018 the TSW staff presented the Auburn Creek FY 19 Routine Maintenance project. The committee voted 15-0 to recommend approval of the project. (New Issue)



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## Review Information

<b>Cycle Type:</b>	1 Submitted (Multi-Discipline)	<b>Submitted:</b>	05/01/2018	Deemed Complete on 05/01/2018
<b>Reviewing Discipline:</b>	Plan Environmental	<b>Cycle Distributed:</b>	05/01/2018	
<b>Reviewer:</b>	Morrison, Susan	<b>Assigned:</b>	05/04/2018	
	(619) 533-6492	<b>Started:</b>	05/22/2018	
	SMorrison@sandiego.gov	<b>Review Due:</b>	06/04/2018	
<b>Hours of Review:</b>	4.00	<b>Completed:</b>	05/31/2018	
<b>Next Review Method:</b>	Submitted (Multi-Discipline)	<b>Closed:</b>		

- . The reviewer has indicated they want to review this project again. Reason chosen by the reviewer: First Review Issues.
- . The reviewer has requested more documents be submitted.
- . Your project still has 1 outstanding review issues with Plan Environmental (all of which are new).

## Env Review 053118

<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input type="checkbox"/>	1	The proposed project appears to be in Substantial Conformance with the Master Storm Water System Maintenance Program (MMP), Master Site Development Permit (SDP No. 2034245), and Program Environmental Impact Report (PEIR [Project No. 42891/SCH No. 2004101032]); however, Environmental staff are awaiting completion of MSCP's review and comments before completing this review. (New Issue)





L64A-003B

## Review Information

<b>Cycle Type:</b> 1 Submitted (Multi-Discipline)	<b>Submitted:</b> 05/01/2018	Deemed Complete on 05/01/2018
<b>Reviewing Discipline:</b> Plan-MSCP	<b>Cycle Distributed:</b> 05/01/2018	
<b>Reviewer:</b> Smit-Kicklighter, Holly	<b>Assigned:</b> 05/04/2018	
(619) 236-6621	<b>Started:</b> 06/07/2018	
hsmi@sandiego.gov	<b>Review Due:</b> 05/30/2018	
<b>Hours of Review:</b> 6.00	<b>Completed:</b> 06/14/2018	
<b>Next Review Method:</b> Submitted (Multi-Discipline)	<b>Closed:</b>	

- . The review due date was changed to 06/04/2018 from 06/04/2018 per agreement with customer.
- . The reviewer has indicated they want to review this project again. Reason chosen by the reviewer: First Review Issues.
- . The reviewer has requested more documents be submitted.
- . Your project still has 7 outstanding review issues with Plan-MSCP (all of which are new).

## MSCP 1st Rev June 2018

<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input checked="" type="checkbox"/>	1	MEMO - To expedite reviews add a upland and wetland impact table with intended ratios instead of only a mitigation location table. Memo mentions upland mitigation will be applied but does not appear to mention what the upland impact is. For that reason, memo a bit superfluous. (New Issue)
<input checked="" type="checkbox"/>	2	MEMO - Use of very dark bolded font is hard to read, also break memo into paragraphs that separate the different items being talked about for greater clarity. Pg 5 example - new paragraph after "The Conceptual Wetland Mit....." would be good and to separate the Upland HAF conversation thread lower down in the page. (New Issue)
<input type="checkbox"/>	3	MEMO - Pg 5 - 0.26 of wetland impact is identified which should receive a higher ratio to achieve no-net loss. I.e. 0.26 ac of impact should have a 1:1 creation/restoration component and a second 1:1 enhancement component instead of what is proposed. (New Issue)
<input checked="" type="checkbox"/>	4	MEMO - Page 5 - what upland is impact and what is acreage? (see it in the IAB) (New Issue)
<input checked="" type="checkbox"/>	5	IBA - Address any issues from the MEMO comments above. (New Issue)
<input type="checkbox"/>	6	IBA - provide emails of the biologists for easier question forwarding or to request a PDF of a document. (New Issue)
<input type="checkbox"/>	7	IBA - It is difficult to see the full mitigation picture quickly in that MMP mit measures are located in IBA on page 11 and separate applicable PEIR MMRPs are then mentioned on pg 13 to be located in Attachment 1. Are the two MMRP systems combined easily in the field (i.e. consolidated on the construction plans? Are there additional measures written as permit conditions that also should be on the CD's? (New Issue)
<input checked="" type="checkbox"/>	8	IBA - Follow up to comment #7 - MSCP understands the format is following MSWP EIR SCR requirements, however the format is less user friendly than a regular bio report to read so important elements are harder to find. Without a PDF to do a find and search it makes the process more time consuming. Please note, MSCP can receive a PDF via email or flash drive only at this time. CLEARED AS INFORMATIONAL (New Issue)
<input type="checkbox"/>	9	MEMO- IBA and City BIO GUIDELINE CONSISTENCY - The memo does not make it clear what tiers/habitats/ratios are being applied per the City's Bio Guidelines. Per Issue 5 above, the IBA gives more information on Table 8 (I see that ratio applied should be 2:1 per that table as the wetland is Arundo dominated/disturbed wetland) but the IBA still does not show a impact and mitigation table showing the project impacts consistent with those of Tables 2A & B and 3 in the City's Biology Guidelines it appears. Please address with future submittal. (New Issue)
<input type="checkbox"/>	10	IBA - not applicable MMRP's - Provide an appendix with all the MSWP EIR MMRP's so staff can review the omitted ones for actual non-applicability instead of having to look up the Master Permit EIR on a website. (New Issue)
<input checked="" type="checkbox"/>	11	NOT IN THE MHPA - The site about 50 feet from the nearest MHPA and buffered by existing development. No MHPA conditions have been applied which appears appropriate. (New Issue)
<input type="checkbox"/>	12	IBA - pg 3 - Vegetation - 6 habitats are listed but lower down additional habitats are listed such as riparian scrub. - was this all removed in the Emergency Project? Also, comprehensive species list hard to locate with out a standard BTR with a Table of Contents and the list has DCSS species shown as ornamental habitat and overall hard to tell if Chaparral is Tier I or III. (New Issue)
<input type="checkbox"/>	13	IBA Page 1 - What are the survey limitations and dates other than the Feb. wetland CRAM survey? What seasonally variable habitats that may have been missed like non-native grassland ? Please address more clearly. (New Issue)



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<u>Issue</u>		
<u>Cleared?</u>	<u>Num</u>	<u>Issue Text</u>
<input checked="" type="checkbox"/>	14	Please note, several comments are made regarding the format of the submittal and for the most part have been cleared. A few more substantive comments have not been cleared and require a response. (New Issue)





THE CITY OF SAN DIEGO

MEMORANDUM

DATE: June 27, 2018

TO: Helene Deisher, Development Project Manager II, Development Services Department

FROM: Mariah Mills, Associate Planner, Transportation & Storm Water Department

SUBJECT: City of San Diego Master Storm Water System Maintenance Program (MMP) Substantial Conformance Review for Auburn Creek Channel FY19 Routine Maintenance Project, MMP Maps 70 and 76, PTS 606769 and I/O #: 21003732

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This memo provides Transportation & Storm Water Department's (T&SWD) formal written response to the issues identified in the Cycle 1 Issues Report for the Auburn Creek Channel FY19 Routine Maintenance Project (MMP Maps 70 and 76) (PTS 606769) substantial conformance review (SCR) package. The Cycle 1 Issues Report was provided to Mariah Mills on June 20, 2018 via email.

**LDR – Planning Review**

*Issue Number 1:* Comment noted, we also acknowledge this comment has been cleared.

**Community Planning Group**

*Issue Number 1:* Comment noted, we also acknowledge this comment has been cleared.

**Environmental**

*Issue Number 1:* Comment noted, we also acknowledge this comment has been cleared.

**MSCP**

*Issue Number 1:* Comment noted, we also acknowledge this comment has been cleared. For reference a table with mitigation ratios is included in Table 9 the Individual Biological Assessment Report (IBA), which was included in the SCR package submitted on April 30, 2018. Proposed upland impacts are described in the IBA, please refer to page 16 and Table 8.

*Issue Number 2:* Comment noted, we also acknowledge this comment has been cleared.

*Issue Number 3:* Per page 5 of the SCR cover memo, the 0.26-acre number cited in the comment is the amount of wetland mitigation proposed to compensate for 0.11 acre of wetland impact for the 2016 emergency maintenance of Map 70. Per page 5 of the SCR cover memo, mitigation for 2016 emergency maintenance of Map 70 is proposed via creation/restoration at the Otay Reed Mitigation Site and enhancement via the Conceptual Wetland Mitigation Plan for 2015/2016 Emergency Channel Maintenance.

Proposed mitigation ratios can be found in Table 9 of the IBA. As shown in Table 9, mitigation for the 2016 emergency maintenance of Map 70 is proposed at 3:1 for riparian scrub (disturbed mule fat scrub), 3:1 for riparian scrub (SWS), 0:1 for disturbed wetland (arundo dominated) and 2:1 for streambed. Per page 17 of the IBA, wetland mitigation proposed for 2016 emergency impacts to Map 70 includes a 1:1 creation/restoration component at the Otay Reed Mitigation Site to satisfy no net loss. The remainder of the mitigation is proposed as enhancement. Refer to Appendix H1 of the SCR package, which contains a table showing the mitigation allocations at Otay Reed Mitigation Site for Map 70, including 1:1 creation for riparian scrub (disturbed mule fat scrub), riparian scrub (SWS), and streambed.

Please note that as described on page 14 of the IBA, mitigation ratios for this project must be and are consistent with those identified in approved SDP No. 1134892 (amended to SDP No. 2034245 in February 2018) for the Master Storm Water System Maintenance Program (MMP). The approved SDP dictates the ratios that are required for the MMP (ratios required for the MMP are different than the City Biology Guidelines). The approved SDP was included as Attachment 9 to the SCR package (on CD). Per this requirement, mitigation ratios do not need to be consistent with Tables 2A, 2B and 3 of the City Biology Guidelines, instead they need to be consistent with the approved SDP. The approved SDP requires the following ratios: 2:1 for impacts to natural flood channels, 3:1 for impacts to riparian habitat, 4:1 for impacts to freshwater marsh and disturbed wetland; under the approved SDP, removal of arundo and other exotic, invasive vegetation is not considered an impact to wetlands requiring mitigation.

*Issue Number 4:* Comment noted, we also acknowledge this comment has been cleared. As indicated in the comment, this information is provided in the IBA. Table 1 of the IBA provides acreage of existing communities, Table 9 displays proposed impact acreages.

*Issue Number 5:* Comment noted, we also acknowledge this comment has been cleared.

*Issue Number 6:* To control costs and workload, if there are questions for our project biologists please let us know and we would be happy to reach out to the biologists. If a PDF copy of a document would be helpful for review, please feel free to ask us and we'd be happy to provide one.

*Issue Number 7:* The format template for the IBA was developed as part of the MMP program. T&SWD is required to use this format for all biological assessments prepared under the program. Please note that the measures included on page 11 of the IBA are MMP maintenance protocols built into the



MMP program, and are not mitigation measures. Regulatory permit applications are currently being processed, so T&SWD does not have a list of additional permit conditions at this time. Once permits are received, all mitigation conditions (MMRP and regulatory permit conditions), the MMP maintenance protocols and construction drawings will be compiled into a hardcopy permit binder and distributed to all parties involved with project construction, for reference in the field.

*Issue Number 8:* Comment noted, we also acknowledge this comment has been cleared. Per process as we understand it, DSD requires us to submit hard copies. However, we have provided a PDF copy of the IBA as Attachment 1 to this memo, for reference.

*Issue Number 9:* As described in response to Issue Number 3 above, mitigation ratios for this project must be and are consistent with those identified in approved SDP No. 1134892 (amended to SDP No. 2034245 in February 2018) for the Master Storm Water System Maintenance Program (MMP). Per the approved SDP, removal of arundo and other exotic, invasive vegetation is not considered an impact to wetlands requiring mitigation. Therefore, the proposed mitigation ratio for proposed impacts to disturbed wetland (arundo-dominated) is 0:1.

*Issue Number 10:* The complete MMP PEIR Mitigation Monitoring and Reporting Program was included within the PEIR as Attachment 8 to the SCR package. Per DSD SCR submittal guidelines, Attachment 8 was submitted to the DSD project manager on CD.

*Issue Number 11:* Comment noted, we also acknowledge this comment has been cleared.

*Issue Number 12:* Yes, as described on pages 2 and 3 of the IBA, riparian scrub was removed as part of the 2016 emergency maintenance of Map 70. The paragraph immediately following Table 1 (on page 3 of the IBA) describes that prior to 2016 emergency maintenance, Map 70 contained 0.06 acre of riparian scrub, 0.01 acre of disturbed wetland and 0.04 acre of natural flood channel. These habitats were impacted by the emergency maintenance activities. Table 1 of the IBA shows existing vegetation types onsite.

As described above, the format template for the IBA was developed as part of the MMP program. T&SWD is required to use this format, instead of the standard BTR format, for all biological assessments prepared under the program. Per the IBA template, the plant and wildlife species lists are included as Attachments 2 and 3 to the IBA, respectively. The comment noted that some of the native plants listed in Attachment 2 are correlated with ornamental habitat. This was done where the biologists observed only a few isolated native individuals within an area that contained a majority of non-native ornamental plants, and was therefore mapped as ornamental.

To address the third part of the comment, as listed in Table 1 of the IBA and text on page 16 of the IBA, the Chaparral habitat onsite is Tier IIIA.

*Issue Number 13:* As described on page 3 of the IBA, all fieldwork (including a biological survey, site assessment and CRAM evaluation) was conducted on Feb 6, 2017. Page 5 of the IBA notes a jurisdictional delineation was also conducted on Feb 6, 2017. The maintenance area for Map 70 is



entirely surrounded by developed areas, therefore the survey limits for Map 70 coincided with the maintenance boundary. Because there are undeveloped areas adjacent to Map 76, the survey limits for Map 76 extended beyond the maintenance area, to include an approximate 50-foot buffer of the surrounding undeveloped land.

To address the second part of the comment, thatch would have been visible for any areas of non-native grassland of at least 0.1 acre in size and those areas would have been mapped. Non-native grasslands were not identified or mapped on the project site.

*Issue Number 14:* Comment noted, we also acknowledge this comment has been cleared.

Should you have any questions or need additional information, please contact me by e-mail at [mmills@san Diego.gov](mailto:mmills@san Diego.gov) or phone at (619) 527-7537.

Sincerely,



Mariah Mills  
Associate Planner

Attachments: 1. Individual Biological Assessment Report, Auburn Creek Channel Maps 70 and 76, March 7, 2018; prepared by Amy Mattson and Jasmine Bakker of Helix Environmental Planning

cc: Christine Rothman, AICP, Development Project Manager III, Transportation & Storm Water Department  
Stephanie Bracci, Senior Planner, Transportation & Storm Water Department  
Shelby Howard, Helix Environmental Planning  
Jasmine Bakker, Helix Environmental Planning

# Cycle Issues DRAFT



THE CITY OF SAN DIEGO  
Development Services Department  
1222 First Avenue, San Diego, CA 92101-4154

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L64A-003B

## Project Information

**Project Nbr:** 606769 **Title:** Auburn Creek FY19Channel Maint  
**Project Mgr:** Deisher, Helene (619) 446-5223 hmdeisher@sandiego.gov



## Review Information

**Cycle Type:** 2 Submitted (Multi-Discipline) **Submitted:** 06/27/2018 Deemed Complete on 06/27/2018  
**Reviewing Discipline:** Plan Environmental **Cycle Distributed:** 06/27/2018  
**Reviewer:** Morrison, Susan **Assigned:** 07/02/2018  
(619) 533-6492 **Started:** 07/10/2018  
SIMorrison@sandiego.gov **Review Due:** 07/12/2018  
**Hours of Review:** 0.00 **Completed:** 07/12/2018  
**Next Review Method:** Submitted (Multi-Discipline) **Closed:**

- . The review due date was changed to 07/12/2018 from 07/24/2018 per agreement with customer.
- . The reviewer has indicated they want to review this project again. Reason chosen by the reviewer: First Review Issues.
- . The reviewer has requested more documents be submitted.
- . Your project still has 1 outstanding review issues with Plan Environmental (1 of which are new issues).

### Env Review 053118

<u>Issue</u>		
<u>Cleared?</u>	<u>Num</u>	<u>Issue Text</u>
<input checked="" type="checkbox"/>	1	The proposed project appears to be in Substantial Conformance with the Master Storm Water System Maintenance Program (MMP), Master Site Development Permit (SDP No. 2034245), and Program Environmental Impact Report (PEIR [Project No. 42891/SCH No. 2004101032]); however, Environmental staff are awaiting completion of MSCP's review and comments before completing this review. (From Cycle 1)

### Env Review 071218

<u>Issue</u>		
<u>Cleared?</u>	<u>Num</u>	<u>Issue Text</u>
<input type="checkbox"/>	2	Additional information is required before an environmental review can be completed. The issues identified in Plan-MSCP review comments must be addressed before an environmental determination can be made on this project. The environmental determination will be made based on the information provided in any subsequent resubmittals. (New Issue)



# Cycle Issues DRAFT



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## Review Information

<b>Cycle Type:</b> 2 Submitted (Multi-Discipline)	<b>Submitted:</b> 06/27/2018	Deemed Complete on 06/27/2018
<b>Reviewing Discipline:</b> Plan-MSCP	<b>Cycle Distributed:</b> 06/27/2018	
<b>Reviewer:</b> Smit-Kicklighter, Holly (619) 236-6621 hsmit@sandiego.gov	<b>Assigned:</b> 06/29/2018	
	<b>Started:</b> 07/12/2018	
<b>Hours of Review:</b> 3.00	<b>Review Due:</b> 07/12/2018	
<b>Next Review Method:</b> Submitted (Multi-Discipline)	<b>Completed:</b> 07/12/2018	
	<b>Closed:</b>	

- . The review due date was changed to 07/12/2018 from 07/24/2018 per agreement with customer.
- . The reviewer has indicated they want to review this project again. Reason chosen by the reviewer: Partial Response to Cmnts/Regs.
- . The reviewer has requested more documents be submitted.
- . Your project still has 5 outstanding review issues with Plan-MSCP (3 of which are new issues).

## MSCP 1st Rev June 2018

<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input type="checkbox"/>	3	MEMO - Pg 5 - 0.26 of wetland impact is identified which should receive a higher ratio to achieve no-net loss. I.e. 0.26 ac of impact should have a 1:1 creation/restoration component and a second 1:1 enhancement component instead of what is proposed. (From Cycle 1)
<input checked="" type="checkbox"/>	6	IBA - provide emails of the biologists for easier question forwarding or to request a PDF of a document. (From Cycle 1)
<input checked="" type="checkbox"/>	7	IBA - It is difficult to see the full mitigation picture quickly in that MMP mit measures are located in IBA on page 11 and separate applicable PEIR MMRPs are then mentioned on pg 13 to be located in Attachment 1. Are the two MMRP systems combined easily in the field (i.e. consolidated on the construction plans? Are there additional measures written as permit conditions that also should be on the CD's? (From Cycle 1)
<input type="checkbox"/>	9	MEMO- IBA and City BIO GUIDELINE CONSISTENCY - The memo does not make it clear what tiers/habitats/ratios are being applied per the City's Bio Guidelines. Per Issue 5 above, the IBA gives more information on Table 8 (I see that ratio applied should be 2:1 per that table as the wetland is Arundo dominated/disturbed wetland) but the IBA still does not show a impact and mitigation table showing the project impacts consistent with those of Tables 2A & B and 3 in the City's Biology Guidelines it appears. Please address with future submittal. (From Cycle 1)
<input checked="" type="checkbox"/>	10	IBA - not applicable MMRP's - Provide an appendix with all the MSWP EIR MMRP's so staff can review the omitted ones for actual non-applicability instead of having to look up the Master Permit EIR on a website. (From Cycle 1)
<input type="checkbox"/>	12	IBA - pg 3 - Vegetation - 6 habitats are listed but lower down additional habitats are listed such as riparian scrub. - was this all removed in the Emergency Project? Also, comprehensive species list hard to locate with out a standard BTR with a Table of Contents and the list has DCSS species shown as ornamental habitat and overall hard to tell if Chaparral is Tier I or III. (From Cycle 1)
<input checked="" type="checkbox"/>	13	IBA Page 1 - What are the survey limitations and dates other than the Feb. wetland CRAM survey? What seasonally variable habitats that may have been missed like non-native grassland? Please address more clearly. (From Cycle 1)

## MSCP 2nd Rev July 2018

<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input type="checkbox"/>	15	MEMO - The response to issues 3 & 9 are not adequate. Disturbed wetland is a mitigable habitat. Merely being dominated by non-native species does not mean natives are not present. The border is on the submitted document mentation to show how the non-natives will be removed (by hand or otherwise) in a manner that natives are not disturbed etc. In addition, if the CDP clause allowing this is the nexus for applying the 0:1 ratio - you need to make that very clear in your submittal package and show your work. Currently the response to issue 9 cite the SDP instead of the CDP. (New Issue)
<input type="checkbox"/>	16	IBA - The response to issue 12 requires more explanation. Please explain that the Emergency Project impact to Riparian Scrub was mitigated for or not and amend the IBA. Also, amend the IBA to justify that the native species found in the ornamental and not truly part of a disturbed native habitat (i.e. that are part of a existing BMZ1 area and or on a developed area and not any area with native soil substrata that is in or adjacent to similar native habitat, and slope aspect and elevation. (New Issue)
<input checked="" type="checkbox"/>	17	MSCP comment on response to issue 13 - Please note, impacts to grassland under 0.1 ac must still be noted and mapped. If the over all upland and wetland project impacts are less than the thresholds, then that comes out in the impact and mitigation sections & additionally it must be discussed in the existing conditions discussion. CLEARED AS INFORMATIONAL (New Issue)

For questions regarding the 'Plan-MSCP' review, please call Holly Smit-Kicklighter at (619) 236-6621. Project Nbr: 606769 / Cycle: 2



## Mills, Mariah

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**From:** Mills, Mariah  
**Sent:** Monday, July 23, 2018 10:21 AM  
**To:** Deisher, Helene; Smit-Kicklighter, Holly  
**Cc:** Nazareno, Angela; Morrison, Susan; Herrmann, Myra; Bracci, Stephanie  
**Subject:** RE: MSCP Comments for Auburn Creek & similar submittals (DRAFT COMMENTS) (PTS 606769)

Hi Holly,

Please see responses below addressing the Draft Cycle 2 comments for Auburn FY19 Routine Channel Maintenance (PTS 606769).

*Issue Number 3.* Please see response to *Issue Number 15* below.

*Issue Number 6.* We acknowledge this comment has been cleared.

*Issue Number 7.* We acknowledge this comment has been cleared.

*Issue Number 9.* Please see response to *Issue Number 15* below.

*Issue Number 10.* We acknowledge this comment has been cleared.

*Issue Number 12.* Please see response to *Issue Number 16* below.

*Issue Number 13.* We acknowledge this comment has been cleared.

*Issue Number 15.* As described on page 4 of the IBA, the Disturbed Wetland (Arundo-dominated) habitat identified in Map 76 occurs within one patch and is dominated by giant reed. A follow-up site visit by City staff and a Helix biologist on July 17, 2018 confirmed that the area mapped as Disturbed Wetland (Arundo-dominated) is composed entirely of invasive non-native giant reed (*Arundo donax*).

Under the Master Storm Water System Maintenance Program (MMP), removal of giant reed does not require mitigation. The City wetland mitigation ratios for this project must be and are consistent with those identified in approved SDP No. 1134892 (amended to SDP No. 2034245 in February 2018) for the MMP. The approved SDP dictates the ratios that are required for the MMP (ratios required for the MMP are different than the MMP PEIR MMRP). The approved SDP was included as Attachment 9 to the SCR package (on CD). Per this requirement, mitigation ratios do not need to be consistent the ratios in the MMP PEIR MMRP or the City's Biology guidelines, instead, they need to be consistent with the approved SDP. Condition 15 of the approved SDP requires the Permittee to comply with Special Conditions 9.a, 9.c, 9.d, 9.e, 10, and 11 of the California Coastal Commission's Coastal Development Permit (CDP) No. A-6-NOC-11-086 in the entire MMP. Condition 9e of the CDP, included as Exhibit B in the approved SDP, identifies that removal of arundo and other exotic, invasive vegetation (e.g., palm trees) is not considered an impact to wetlands requiring mitigation. Therefore, the proposed mitigation ratio for impacts under the MMP for areas composed of arundo is 0:1. As described above, the area mapped within Map 76 as Disturbed Wetland (Arundo-dominated) is composed entirely of non-native arundo. Therefore, impacts to and removal of this vegetation does not require mitigation and the mitigation ratio proposed for this area is 0:1.

*Issue Number 16.* To address the first portion of the comment, impacts to Riparian Scrub from the Emergency Maintenance of Map 70 are being mitigated. Mitigation is being provided at a ratio of 3:1 – composed of 1:1 creation restoration at the Otay Reed Site (via the Otay Reed Site Wetland Habitat Mitigation and Monitoring Plan) (to satisfy No

Net Loss) and 2:1 enhancement via implementation of the Conceptual Wetland Mitigation Plan for 2016/2016 Emergency Channel Maintenance. Mitigation proposed under these plans has not yet been constructed, however, both plans have clearly assigned credits to the Auburn Map 70 emergency. This information is provided in the following portions of the original submittal and responses to Review Cycle 1:

- Tables 5 and 9 of the IBA and associated text;
- Page 17 of the IBA;
- Appendix H1 to the SCR package (excerpt from the Otay Reed Site Wetland Habitat Mitigation and Monitoring Plan);
- Appendix H2 to the SCR package (Conceptual Wetland Mitigation Plan for 2016/2016 Emergency Channel Maintenance); and
- Response Memo to Review Cycle 1 Issues, dated 6/27/18 – see response to Issue 3

To address the second portion of the comment, the ornamental vegetation mapped within Map 76 is described on page 4 of the IBA. A follow-up site visit conducted by City staff and a Helix biologist on July 17, 2018 confirmed that the ornamental vegetation mapped in Map 76 is not part of a disturbed native habitat. The site visit confirmed that the ornamental habitat within Map 76 is composed of non-native species hottentot-fig (*Carpobrotus* sp.), smilo grass (*Stipa miliacea*), and fennel (*Foeniculum vulgare*); there was one individual of native buckwheat. Smilo grass is a perennial non-native species that is an escaped ornamental species and does constitute non-native grassland, which is primarily characterized by annual non-native grass species that function as habitat for foraging raptors. The portion of the slope mapped as ornamental is characterized primarily by non-native perennial species that do not function as habitat. A single individual native plant does not categorize this as a disturbed native habitat. Therefore, the one native species found in the area mapped as ornamental is part of an ornamental habitat, and not part of a disturbed native habitat.

The portion of the slope mapped as disturbed chaparral is composed of scattered laurel sumac (*Malosma laurina*) shrubs mixed with the non-native species listed above as ornamental (hottentot-fig, smilo grass, and fennel). This was mapped separately from the area of ornamental non-native plants that did not contain laurel sumac. As described on page 17 of the IBA, impacts to 0.01 acre of this area mapped as chaparral are being mitigated through the purchase of credits at the City's Marron Valley Cornerstone Lands Conservation Bank.

Finally, to address your concerns regarding the species listed in the comprehensive species list (Attachment 2 of the IBA), please note, as we discussed in the field at ESA's drone demo, the biological survey area was larger than the maintenance boundary of the project. Therefore, there are species listed in Attachment 2 that are not present in the proposed maintenance area. Attachment 2 lists Mohave yucca, poison oak, mule fat, broom baccharis, blacksage, buckwheat and dwarf nettle as natives that were found within ornamental areas. Of these, only buckwheat was found within the ornamental area questioned in Issue No. 16. As described in the first paragraph of this response, the ornamental area questioned in Issue No. 16 contains hottentot-fig, smilo grass, fennel and one individual buckwheat.

Thank you,  
Mariah



# Cycle Issues

8/2/18 9:02 am

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L64A-003A

THE CITY OF SAN DIEGO  
Development Services Department  
1222 First Avenue, San Diego, CA 92101-4154

## Project Information

**Project Nbr:** 606769 **Title:** Auburn Creek FY19Channel Maint  
**Project Mgr:** Deisher, Helene (619) 446-5223 hmdeisher@sandiego.gov



## Review Information

**Cycle Type:** 2 Submitted (Multi-Discipline) **Submitted:** 06/27/2018 Deemed Complete on 06/27/2018  
**Reviewing Discipline:** Plan Environmental **Cycle Distributed:** 06/27/2018  
**Reviewer:** Morrison, Susan **Assigned:** 07/02/2018  
(619) 533-6492 **Started:** 07/10/2018  
SIMorrison@sandiego.gov **Review Due:** 08/07/2018  
**Hours of Review:** 2.00 **Completed:** 08/01/2018 **COMPLETED ON TIME**  
**Next Review Method:** Submitted (Multi-Discipline) **Closed:** 08/02/2018

- . The review due date was changed to 08/07/2018 from 07/24/2018 per agreement with customer.
- . We request a 3rd complete submittal for Plan Environmental on this project as: Submitted (Multi-Discipline).
- . The reviewer has requested more documents be submitted.
- . Last month Plan Environmental performed 5 reviews, 80.0% were on-time, and 20.0% were on projects at less than < 3 complete submittals.

### Env Review 053118

<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input checked="" type="checkbox"/>	1	The proposed project appears to be in Substantial Conformance with the Master Storm Water System Maintenance Program (MMP), Master Site Development Permit (SDP No. 2034245), and Program Environmental Impact Report (PEIR [Project No. 42891/SCH No. 2004101032]); however, Environmental staff are awaiting completion of MSCP's review and comments before completing this review. (From Cycle 1)

### Env Review 071218

<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input checked="" type="checkbox"/>	2	Additional information is required before an environmental review can be completed. The issues identified in Plan-MSCP review comments must be addressed before an environmental determination can be made on this project. The environmental determination will be made based on the information provided in any subsequent resubmittals. (New Issue)

### Env Review 073118

<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input checked="" type="checkbox"/>	3	Plan Environmental has completed the review of the resubmittal and is satisfied with the responses to comments related to Plan - MSCP. (New Issue)
<input checked="" type="checkbox"/>	4	Based on review of the submitted documents, including the Memorandum dated June 27, 2018 and the IBA dated 3/7/2018, Plan Environmental has determined that the Auburn Creek Channel routine maintenance is in substantial conformance with the Master Storm Water System Maintenance Program (MMP), including Maps 70 and 76, the Master Site Development Permit (SDP) No. 1134892 amended by SDP No. 2034245, and the Program Environmental Impact Report (PEIR [Project No. 42891/SCH No. 2004101032]). (New Issue)





# Cycle Issues



THE CITY OF SAN DIEGO  
Development Services Department  
1222 First Avenue, San Diego, CA 92101-4154

8/2/18 9:02 am

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L64A-003A

## Review Information

<b>Cycle Type:</b>	2 Submitted (Multi-Discipline)	<b>Submitted:</b>	06/27/2018	Deemed Complete on 06/27/2018
<b>Reviewing Discipline:</b>	Plan-MSCP	<b>Cycle Distributed:</b>	06/27/2018	
<b>Reviewer:</b>	Smit-Kicklighter, Holly	<b>Assigned:</b>	06/29/2018	
	(619) 236-6621	<b>Started:</b>	07/12/2018	
	hsmi@sandiego.gov	<b>Review Due:</b>	07/31/2018	
<b>Hours of Review:</b>	6.00	<b>Completed:</b>	07/31/2018	<b>COMPLETED ON TIME</b>
<b>Next Review Method:</b>	Conditions	<b>Closed:</b>	08/02/2018	

- . The review due date was changed to 08/07/2018 from 07/24/2018 per agreement with customer.
- . We request a 3rd complete submittal for Plan-MSCP on this project as: Conditions.
- . The reviewer has requested more documents be submitted.
- . Last month Plan-MSCP performed 25 reviews, 72.0% were on-time, and 62.5% were on projects at less than < 3 complete submittals.

## MSCP 1st Rev June 2018

<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input checked="" type="checkbox"/>	3	MEMO - Pg 5 - 0.26 of wetland impact is identified which should receive a higher ratio to achieve no-net loss. I.e. 0.26 ac of impact should have a 1:1 creation/restoration component and a second 1:1 enhancement component instead of what is proposed. (From Cycle 1)
<input checked="" type="checkbox"/>	6	IBA - provide emails of the biologists for easier question forwarding or to request a PDF of a document. (From Cycle 1)
<input checked="" type="checkbox"/>	7	IBA - It is difficult to see the full mitigation picture quickly in that MMP mit measures are located in IBA on page 11 and separate applicable PEIR MMRPs are then mentioned on pg 13 to be located in Attachment 1. Are the two MMRP systems combined easily in the field (i.e. consolidated on the construction plans? Are there additional measures written as permit conditions that also should be on the CD's? (From Cycle 1)
<input checked="" type="checkbox"/>	9	MEMO- IBA and City BIO GUIDELINE CONSISTENCY - The memo does not make it clear what tiers/habitats/ratios are being applied per the City's Bio Guidelines. Per Issue 5 above, the IBA gives more information on Table 8 (I see that ratio applied should be 2:1 per that table as the wetland is Arundo dominated/disturbed wetland) but the IBA still does not show a impact and mitigation table showing the project impacts consistent with those of Tables 2A & B and 3 in the City's Biology Guidelines it appears. Please address with future submittal. (From Cycle 1)
<input checked="" type="checkbox"/>	10	IBA - not applicable MMRP's - Provide an appendix with all the MSWP EIR MMRP's so staff can review the omitted ones for actual non-applicability instead of having to look up the Master Permit EIR on a website. (From Cycle 1)
<input checked="" type="checkbox"/>	12	IBA - pg 3 - Vegetation - 6 habitats are listed but lower down additional habitats are listed such as riparian scrub. - was this all removed in the Emergency Project? Also, comprehensive species list hard to locate with out a standard BTR with a Table of Contents and the list has DCSS species shown as ornamental habitat and overall hard to tell if Chaparral is Tier I or III. (From Cycle 1)
<input checked="" type="checkbox"/>	13	IBA Page 1 - What are the survey limitations and dates other than the Feb. wetland CRAM survey? What seasonally variable habitats that may have been missed like non-native grassland? Please address more clearly. (From Cycle 1)

## MSCP 2nd Rev July 2018

<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input checked="" type="checkbox"/>	15	MEMO - The response to issues 3 & 9 are not adequate. Disturbed wetland is a mitigable habitat. Merely being dominated by non-native species does not mean natives are not present. The border is on the submitted document mentation to show how the non-natives will be removed (by hand or otherwise) in a manner that natives are not disturbed etc. In addition, if the CDP clause allowing this is the nexus for applying the 0:1 ratio - you need to make that very clear in your submittal package and show your work. Currently the response to issue 9 cite the SDP instead of the CDP. (New Issue)
<input checked="" type="checkbox"/>	16	IBA - The response to issue 12 requires more explanation. Please explain that the Emergency Project impact to Riparian Scrub was mitigated for or not and amend the IBA. Also, amend the IBA to justify that the native species found in the ornamental and not truly part of a disturbed native habitat (i.e. that are part of a existing BMZ1 area and or on a developed area and not any area with native soil substrata that is in or adjacent to similar native habitat, and slope aspect and elevation. (New Issue)
<input checked="" type="checkbox"/>	17	MSCP comment on response to issue 13 - Please note, impacts to grassland under 0.1 ac must still be noted and mapped. If the over all upland and wetland project impacts are less than the thresholds, then that comes out in the impact and mitigation sections & additionally it must be discussed in the existing conditions discussion. CLEARED AS INFORMATIONAL (New Issue)

For questions regarding the 'Plan-MSCP' review, please call Holly Smit-Kicklighter at (619) 236-6621. Project Nbr: 606769 / Cycle: 2

