

Cycle Issues



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

8/22/18 3:35 pm

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L64A-003A

Project Information

Project Nbr: 608808 **Title:** South Chollas MMP 101 SCR
Project Mgr: Deisher, Helene (619) 446-5223

hmdeisher@sandiego.gov



Review Information

Cycle Type: 2 Plan-MSCP (Submit)	Submitted: 05/25/2018	Deemed Complete on 05/25/2018
Reviewing Discipline: Plan-MSCP	Cycle Distributed: 05/25/2018	
Reviewer: Smit-Kicklighter, Holly (619) 236-6621 hsmit@sandiego.gov	Assigned: 06/01/2018 Started: 07/03/2018 Review Due: 08/27/2018	
Hours of Review: 8.00	Completed: 08/22/2018	COMPLETED ON TIME
Next Review Method: Conditions	Closed: 08/22/2018	

- . The review due date was changed to 08/27/2018 from 06/25/2018 per agreement with customer.
- . We request a 2nd complete submittal for Plan-MSCP on this project as: Conditions.
- . The reviewer has requested more documents be submitted.
- . Last month Plan-MSCP performed 11 reviews, 63.6% were on-time, and 70.0% were on projects at less than < 3 complete submittals.

SCR Checklist

Cleared?	Issue Num	Issue Text
<input checked="" type="checkbox"/>	1	Item 13 & 14 - Upland payment into the HAF - South Chollas is considered a SCR project to the Master Stormwater Permit PEIR. PEIR cumulative impacts were not addressed, rather each covered area is required to come in under an individual project SCR review wherein specific impacts are identified and applicable MMRPs are applied. CLEARED AS INFORMATIONAL (New Issue)
<input checked="" type="checkbox"/>	2	Items 15, 16, 18, 19, 21, 22 & 25 - In the future, please include adherence to the related mitigation measures in PEIR MMRP in the basis for determination column and also CDP requirement for timing of construction to require written permission should work be scheduled between Feb 15 and Sept 15 of any year. CLEARED AS INFORMATIONAL (New Issue)

IBA

Cleared?	Issue Num	Issue Text
<input checked="" type="checkbox"/>	3	Pg 2 - Stream Type - South Chollas was listed as an ephemeral stream in the IBA and as a City Wetland. Typically non-blue line cobble channels with no wetland vegetation are listed as ephemeral and typically they do not qualify as wetlands but only waters of the US. Please call S. Chollas Creek an intermittent or perennial stream in the future. CLEARED AS INFORMATIONAL (New Issue)
<input checked="" type="checkbox"/>	4	Pg 3; & Table 3 & 4 & Related Analysis - The concrete banks of Chollas Creek are variously called Streambed/Natural Flood Channel & City disturbed upland. If the bed/banks were not concrete covered, presumably they would be vegetated further with wetland species. Consistent with City defined wetland wherein "human activities" have removed historic wetland per pg 4 discussion, please amend Table 3 as it would appear to be more accurate if consistent with Table 2. Elsewhere (pg3/Table 7) concrete lined channel is referred to as "Natural Flood Channel" - change all to disturbed wetland. (New Issue)
<input checked="" type="checkbox"/>	5	Pg 7 - 3rd issue from the top (Consider numbering issue areas for easier reference). Consistent with the measures listed in PTS comment 2 above - please amend the language to be consistent. Pregrading surveys during the general avian breeding season are required AND positive surveys may require avoidance &/or additional appropriate mitigation depending on the species/circumstances. CLEARED AS PAGES 10-12 actually address this concern. (New Issue)
<input checked="" type="checkbox"/>	6	pg 12 - Last issue on pg & Table 7 pg 14- Please discuss the overlap of wetland types between the Agencies and amend per early comment on the channel banks being disturbed City wetland rather than DEV upland. CLEARED AS THIS CAN BE ASCERTAINED BY COMPARING TABLE 3 WITH FIGURE 6 OF THE IBA. (New Issue)
<input checked="" type="checkbox"/>	7	Pg 14 - The first sentence of the page states that the City regulates both earthen and concrete-lined channels - please make the entire IBA consistent with this statement. The paragraph also says that no impact will result to concrete-lined channels without accumulated sediment but then Table 7 states that 0.16 acres will be impacted making the above statement unnecessary to state and calls the concrete channel part of the natural flood channel when it appears to be a disturbed wetland area. Please clear up all discrepancies and provide required related mitigation per City Bio Guidelines. (New Issue)
<input checked="" type="checkbox"/>	8	Table 8 - call out the 0.21 ac of concrete channel bank appropriately in the report which is actually a City wetland. (New Issue)

For questions regarding the 'Plan-MSCP' review, please call Holly Smit-Kicklighter at (619) 236-6621. Project Nbr: 608808 / Cycle: 2





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<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input checked="" type="checkbox"/>	9	Wetland Mitigation - Explain compliance with PEIR MMRP 4.3.9 which calls for mitigation within the impacted watershed or demonstration of infeasibility- with the proposed wetland mitigation on pg 14 to be at the Stadium Mitigation site. Also explain consistency of the project with PEIR responses to comments P12; P21; P22 & the Chollas Creek Enhancement Plan which call for removal of concrete within the channel where possible. and exploration of mitigation within the creek at the time maintenance is proposed. THIS COMMENT WILL BE CLEARED WHEN THIS INFORMATION IS INCLUDED IN A UPDATED IBA. (New Issue)
<input checked="" type="checkbox"/>	10	Figure 6 - outline the concrete channel/bank areas as natural versus concrete areas are currently not readily apparent. CLEARED AS COMPARISON BETWEEN TABLE 3 & FIGURE 6 PROVIDE THIS INFORMATION. (New Issue)
<input checked="" type="checkbox"/>	11	Issues 4, 6, 7 & 8 will be cleared when the IBA is amended to include a caveat note to explain the discrepancy over concrete channels in a streambed being "Disturbed wetlands" in the City's biology guidelines but approved to be called "Developed Uplands" in the adopted PEIR. MSCP also concurs that no mitigation is required to clear unvegetated concrete lined stream bed in this case. CLEARED AS INFORMATIONAL (New Issue)

MEMO

<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input checked="" type="checkbox"/>	12	Per the Memo List, please label all related Appendices & Attachments in the future for clarity. CLEARED AS INFORMATIONAL (New Issue)

MAINTENANCE PLAN (IMP)

<u>Cleared?</u>	<u>Issue Num</u>	<u>Issue Text</u>
<input checked="" type="checkbox"/>	13	Please include all MMRP measures listed in the IBA as updated to reflect MSCP comments. Also include mitigation measures listed in comment 2 above. (New Issue)
<input checked="" type="checkbox"/>	14	Per item 17 on sheet 3-D, include a revegetation plan as applicable for any on-site areas of impact if applicable. (New Issue)
<input checked="" type="checkbox"/>	15	Sheet 3-D - add to Maintenance BMP notes a note about environmental hygiene (i.e. equipment will be inspected and cleaned in place to limit the transfer of invasive rhizomes, seeds and infectious agents to new off-site work areas. (New Issue)
<input checked="" type="checkbox"/>	16	Items 13-15 cleared per applicants responses as summarized below: Response for 13 is that the MMRP is provided in the field during construction in a final permit binder. Response for 14 is that a revegetation plan is not needed for a 0.04 ac of DCSS cleared on-site as off-site mitigation will occur. Response for 15 is that crews are well aware and practice good environmental hygiene and it is not necessary open a new PO to address. (New Issue)

