



THE CITY OF SAN DIEGO

M E M O R A N D U M

DATE: June 21, 2018

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

FROM: Antoinette Gibbs, Associate Planner, Transportation & Storm Water Department

SUBJECT: City of San Diego Master Storm Water System Maintenance Program (MMP)
– Substantial Conformance Review for Via de la Bandola Emergency Channel Maintenance Project; MMP Map 130a

REFERENCE: PTS No. 470565 – After-the-fact Substantial Conformance Review/PTS
No. 458147 – Emergency Permit – Approval No. 1603563 – Emergency Authorization (ESL)

The Via de la Bandola Channel was not included in the original Master Storm Water System Maintenance Program (MMP) and subsequent to a 2015 emergency maintenance project, Transportation & Storm Water Department (TSWD) submitted an application on April 5, 2016 for an after-the-fact Site Development Permit (SDP/PTS #470565) to Development Services Department. It was determined that the channel was not currently in the MMP but it could be added by amending the existing Site Development Permit approved under the original MMP. On February 26, 2018 the City Council Approved by Ordinance, an amendment to the original SDP to add the Via de la Bandola Channel, Map 130a, (PTS# 528126) to the MMP.

The TSWD is now submitting the enclosed application for a Substantial Conformance Review (SCR) to your department for emergency maintenance that was conducted November 25, 2015 at the Via de la Bandola Channel. Notification of the emergency maintenance was provided to the City of San Diego's DSD on November 16, 2015, with an application for an Emergency SDP, pursuant to Section 143.0126(a) of the Environmentally Sensitive Lands (ESL) provision of the Municipal Code.

Location

The maintenance area is located in the San Ysidro Community Planning Area. The concrete-lined drainage channel is located south of State Route 905, North of Via de la Bandola, east of Picador Boulevard, and west of Interstate 805. The channel is located in the Tijuana River watershed.

Emergency Maintenance Description

The project involved the removal of dense vegetation and sediment in a 370-foot-long, 6-foot-wide, concrete lined drainage channel. A bobcat was lowered via crane into the channel to push vegetation and sediment to a central location where an excavator placed outside of the channel at 4004 Via de la Bandola would then load the debris collected into dump trucks to be hauled off-site to the Miramar landfill. A Vactor truck was used at the outfall at 1661 Picador Boulevard to capture any water leaving the work area. Sandbag berms and pumps were used to bypass and pump water into the downstream culvert.

Master Maintenance Plan Documentation

Due to the emergency nature of the project, individual technical studies were not able to be conducted for the project including an Individual Maintenance Plan (IMP), Individual Hydrologic and Hydraulic Assessment (IHHA), Individual Water Quality Assessment (IWQA), Individual Historic Assessment (IHA), or Individual Noise Assessment (INA); however, a site-specific analysis for each is given below.

Mitigation

Mitigation will be provided at the Tijuana River Advanced-Permittee Responsible Mitigation Project site. The plan will be submitted via a separate submittal; however, a draft plan has been included for your references. TSWD is working towards implementing the project to reserve 0.19 acre of wetlands Creation/Restoration, 0.48 acre of wetland enhancement for a total of 0.67 acre of wetlands mitigation for this project.

Individual Maintenance Plan

In lieu of an IMP, please find the following description of the maintenance that was performed along with associated Best Management Practices (BMPs). The project was designed by City crews and the project biologist to conform to the MMP, while allowing the work to be conducted in an expeditious manner to address the immediate emergency.

Emergency maintenance included the removal of all existing vegetation and sediment within a trapezoidal concrete-lined channel that extends approximately 670 feet with a bottom width of 6 feet and a top width of 24 feet. On November 25, 2015, emergency maintenance crews began the removal work and the channel was fully cleared and cleaned on December 6, 2015.

During maintenance, a Bobcat was used to push material within the concrete-lined channel to an excavator staged outside of the channel behind 4004 Via de la Bandola. The excavator then loaded the material into dump trucks, which hauled the material off to the approved disposal site.

Temporary construction-related BMPs were implemented to prevent/minimize impacts during performance of emergency maintenance activities such as access/staging, vegetation and sediment removal and post-maintenance clean-up of the project area. BMPs were implemented by trained personnel, and included: installation of temporary gravel bag dams upstream and downstream of the maintenance area to prevent flows from entering or exiting the maintenance area, and to prevent potential sediment transport from the channel work area to areas downstream; pumps to bypass the water around maintenance work areas, as needed.; and a Vactor truck was staged at the downstream end of the work areas and utilized as necessary to prevent downstream flow of silt or sediment from the project site. Additional BMPs/mitigation measures related to protection of water quality are described in the Water Quality Assessment section. No work occurred during the breeding or nesting season of any sensitive species.

Individual Biological Assessment

A Post-Maintenance IBA was prepared to document the authorized emergency maintenance conducted (Appendix A). The channel was initially surveyed prior to emergency maintenance on December 9, 2014; followed by a post maintenance site visit on January 20, 2016. Data collected during surveys included comprehensive species lists, habitat suitability assessments for sensitive species. Habitats in the channel are appropriate for sensitive riparian species, but the small patch size and isolation from similar habitats makes it unlikely that the channel supports any such species. No portion of the maintenance activity was within the Multi-Habitat Planning Area (MHPA). Vegetation communities that were removed as part of this maintenance included 0.09 acre of southern willow scrub and 0.10 acre of disturbed freshwater marsh. There was an additional 0.02 acre of non-native vegetation (i.e. ornamental/disturbed land) on the eastern end of the maintenance area that was cleared. There is also an additional 0.02 acre of developed concrete-lined channel at the east end that is not vegetated (i.e. developed concrete-lined channel) and did not require maintenance.

Individual Hydrologic and Hydraulic Assessment

No quantitative hydrologic or hydraulic studies (e.g., modeling) were completed for this channel. Instead, the evidence of flooding as reported by adjacent private residences and observed by City crews was investigated and determined to be the result of sediment and vegetation that had accumulated within the Via de la Bandola channel. This information, in lieu of an IHHA, was presented to the U.S. Army Corps of Engineers (ACOE) and Regional Water Quality Control Board (RWQCB) to supplement the application for use of Regional General Permit (RGP) 63 to conduct emergency channel maintenance to remove the immediate threat to property. The ACOE, with RWQCB concurrence, granted authorization under RGP 63.

The entire reach required clearing because it was determined that removing only the downstream portion of vegetation and sediment would have caused instability to the overall vegetative structure in the channel and encouraged sloughing. Sloughing of channel vegetation would have further increased the risk of flooding during what has been forecasted to be an above-average rainfall year caused by El Niño weather patterns.

Individual Water Quality Assessment

The MMP provides a quantitative framework for assessing maintenance-related water quality impacts by evaluating the potential pollutant removal capacity of a channel (in the pre-maintenance condition) with the potential benefits or impacts resulting from channel maintenance (i.e., removal of sediment and vegetation). However, a comprehensive Individual Water Quality Assessment (IWQA) was not prepared for this channel prior to work due to the emergency nature of the maintenance activities. I have included a copy of a memo that was submitted with after-the-fact SDP submitted on April 5, 2016 that provides additional information as it pertains to the water quality assessment (see Attachment 7).

Historical Assessment

The entire length of the emergency maintenance section of the Via de la Bandola Channel is concrete-lined; therefore, the potential for historical resources was very low and no technical historical records search or monitoring was conducted prior to or after the work. This is consistent with the requirements of the MMP PEIR, which does not require historical assessments for concrete-lined channels.

Noise Assessment

Due to the emergency nature of the project a noise assessment was not performed for the Via de la Bandola Channel. The PEIR identifies sensitive avian species as the only sensitive noise receptors for channel maintenance activities. The emergency maintenance work was conducted outside of the breeding season of any sensitive avian species; therefore, impacts from noise were not expected and no technical studies for noise impacts from maintenance were conducted.

In conformance with the City's MMP, SDP No. 2034245 and PEIR Project No. 42891/SCH No. 2004101032, the following documents have been included for your review related to the proposed maintenance for the Via de la Bandola Emergency Channel Maintenance:

- Application (Form DS-3032) (**Attachment 1**)
- Substantial Conformance Review (SCR) checklist (**Attachment 2**)
 - Individual Biology Assessment (IBA) (**Appendix A**)
- Storm Water Checklist (Form DS-560) (**Attachment 3**)
- Supplementary Discretionary Project Application (Form DS-3035) (**Attachment 4**)
- Regulatory Agency Permits Approvals (**Attachment 5**)
- Climate Action Plan Consistency Checklist Application (**Attachment 6**)
- Memorandum to Helene Deisher dated April 5, 2016 (**Attachment 7**)

In addition, a CD (**Attachment 8**) containing the following documents are attached for your reference:

- Public Notice Package
- Master Storm Water System Maintenance Program (MMP)
- Final PEIR for the MMP
- Master SDP
- Draft Tijuana River Advanced-Permittee Responsible Mitigation Project Plan

Should you have any comments or questions, please contact me at 619-527-5415 or agibbs@sanidiego.gov.

Antoinette Gibbs
Associate Planner

Attachments: 1. Application (DS-3032)
2. Substantial Conformance Review Checklist with Appendix A
3. Storm Water Checklist (DS-560)
4. Supplemental Discretionary Project Application (DS-3035)
5. Regulatory Agency Permit Approvals
6. Climate Action Plan Consistency Checklist Application
7. Memorandum to Helene Deisher dated April 5, 2016 – Subject: Via de la Bandola Emergency Channel Maintenance Technical Studies Memorandum for the (IO No. 2103732)
8. CD containing the following documents
 -Public Notice Package
 -MMP
 -Final PEIR for the MMP
 -Master SDP
 -Draft Tijuana River Advanced-Permittee Responsible Mitigation Project Plan

cc: Roger Wammack, Assistant Deputy Director, Transportation & Storm Water Department
Christine Rothman, Development Project Manager III, Transportation & Storm Water Department
Chris Gascon, Senior Civil Engineer, Transportation & Storm Water Department
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Stephanie Bracci, Senior Planner, Transportation & Storm Water Department
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