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Via email to: [DSDEAS@san.rr.com](mailto:DSDEAS@san.rr.com)

Myra Hermann, Environmental Planner  
City of San Diego Development Services

Re: Master Storm Water System Maintenance Program (MSWSMP)  
Draft Program Environmental Report (PEIR)  
Project No. 42891/SCH No. 2005101032

Attachment: Photo taken at site of water monitoring in Rose Creek, Map 29

Dear Ms. Hermann:

As Executive Director of Friends of Rose Canyon, I appreciate the opportunity to comment on the above Draft PEIR on behalf of our 3,000 supporters. The mission of Friends of Rose Canyon is to protect, preserve and restore Rose Canyon and the Rose Creek watershed. Hence we have a profound interest in the MSWSMP proposed in this Draft PEIR.

**General Points**

- We strongly support the comments submitted by the following, which address the total inadequacy of this document:

1. San Diego Audubon Society
2. San Diego Canyonlands (I am a member of the Advisory Board)
3. The San Diego Canyons Coalition, of which our organization is a member
4. Karin Zirk, a volunteer with Friends of Rose Creek.

- We strongly support the conclusion of San Diego Audubon in their comment letter:  
"THE STORM WATER SYSTEM MANAGEMENT PROGRAM NEEDS TO BE PART OF A COMPREHENSIVE WATERSHED IMPROVEMENT, WATER QUALITY, AND FLOOD MANAGEMENT PROGRAM."

- We concur with their comments that the CEQA analysis is inadequate, that the alternatives analysis is wholly inadequate, and that the Draft PEIR is incompatible with the MSCP.

- We specifically call for the areas in Maps 27-30 (Gillman Canyon and Rose Canyon north of SR 52) to be removed from the PEIR, and a full project level EIR done on these areas in the future should the city decide any action is necessary.

**I. The Draft PEIR provides no substantial purpose for the actions proposed. Simply defining the objectives of the MSWSMP does not provide a purpose.**

The PEIR needs to state a need and purpose for the actions to be taken in the MSWSMP, and then make a case that the huge environmental impacts incurred over the entire city for the next 20 years are justified. The draft PEIR merely states vaguely (ES-1) that the city needs to assure “that the municipal storm water system provides adequate flood control.” What is adequate flood control? What specific problems exist or are anticipated and where? What actions would correct or prevent those specific problems? What is the urgent or compelling purpose that would justify the huge environmental impacts from this MSWSMP? The Draft PEIR is silent on this.

**As Yogi Berra said, “If you don’t know where you’re going, you might end up somewhere else.”**

Without such information, it is impossible to evaluate either the actions proposed or the alternatives. How is it possible for the public to comment or for decision makers to make an informed decision without such basic information? It is little wonder that the entire PEIR, including the alternatives analysis, is so deficient, as explained in letters submitted by San Diego Audubon Society and San Diego Canyonlands.

Instead of providing a clear purpose, the Draft PEIR merely states the following primary objectives of the MSWMP:

- *Develop a comprehensive Program to govern future maintenance activities needed to maximize the effectiveness of the City’s existing storm water system;*
- *Set forth a series of BMPs to be implemented during storm water system maintenance which balance the flood protection function while maintaining, to the greatest degree possible, the aesthetic and biological value of the system;*
- *Minimize the disruption of adjacent property from storm water system maintenance; and*
- *Develop an SCR process to simplify the authorization process required from local, state and federal agencies with regulatory power over wetlands for annual maintenance activities consistent with the proposed Program.*

This description of activities provides no justification for the scope of the program, its far-reaching impacts (many of which are un-mitigable), its 20-year length with little to no meaningful public environmental review by either the public or elected decision-makers.

The lack of a compelling purpose, as well many of other deficiencies in the PEIR, are highlighted by the inclusion of several segments of the Rose Creek watershed with which I am very familiar – maps 27 and 28 (along Gilman) and 29 and 30 (the west end of Rose Canyon north of SR 52). Much of these corridors are natural stream channels with substantial riparian vegetation and no risk of flooding that could threaten public safety or private property. Specific comments on this are below.

**II. The Draft PEIR fails to state that wetland impacts could be caused by access roads as well.**

The Draft PEIR states there would be direct impacts to biological resources (p.2):  
“Wetland impacts would occur within the drainage channels. Upland impacts would occur

on the upper elevations of the channels and in association with new or improved roads used for equipment access to channels.” However, in the case of Maps 27 and 28 (Gilman Canyon) and 29 and 30 (Rose Canyon), the creation of access roads would cause both upland and wetland impacts. The PEIR would allow construction of roads up to 18’ wide that could be used at least every 3-5 years that would of necessity need to be built through wetland areas.

### **III. The alternatives analysis is woefully inadequate.**

There is no serious analysis of how reducing flows into streams and storm channels could address the problem, or how targeted actions at specific sites could address the problem. This should be analyzed within each watershed. For example, the western end of Rose Creek in middle Rose Canyon (Map 29) used to be dry in the summer, but now flows year round from development in north UC. Even though there is no risk from flooding in this area, if run-off were better-controlled (at UCSD and La Jolla Colony and other development in the area), the amount of storm water in these areas would be lessened. The Draft PEIR fails to analyze how reducing flows in targeted locations might lead to long-term solutions that might be more costly in the short run but save money in the long run and significantly reduce environmental impacts. This is of particular concern, since this is a 20-year PEIR. There is no analysis that addresses alternatives in terms of long-term costs and environmental impacts.

**The following comments focus on the areas with which I am personally familiar. This includes:**

- 1. Maps 27 and 28 (Gilman Canyon) – in the MSCP; all of it natural stream channel (except a short stretch between Gilman Canyon and Rose Canyon)**
- 2. Map 29 (Rose Canyon north of SR 52) – in the MSCP and in Rose Canyon Open Space Park; about half natural stream channel with substantial riparian vegetation including willow, sycamore and oak; and half concrete channel (the PEIR should correct the vegetation mapping for the stretch of channel shown as open water – it is in fact Freshwater Marsh, having extensive cattails and some willow)**
- 3. Map 30 (Rose Canyon immediately north of 52) – in the MSCP and in Rose Canyon Open Space Park and Marion Bear Open Space Park; concrete channel with substantial riparian vegetation**

**However, many of these comments are applicable to the entire Draft PEIR. They should be addressed in relation to the entire PEIR where applicable.**

### **IV. The areas in Maps 27, 28, 29, 30 should be removed from the PEIR and from the MSWSMP for the following reasons:**

**a. They present no flood risks.** The areas in these four maps are all in the MSCP and in open space areas with limited or no existing access roads. The closest homes are on high bluffs above them. None of these present any risk of flooding that would entail damage to private property or risk to people. The PEIR should remove these segments. If not, it must provide specific justification for including them in activities whose purpose is flood control and must show the proposed access routes and the clearing actions likely and estimate the environmental impacts involved.

b. These four maps represent the top of this finger of the Rose Creek Watershed. Cleaning vegetation in these areas would seem to cause the exact opposite effect of the purpose of the MSWSMP: i.e. it would likely increase the speed of flow and hence increase the risk of

flooding downstream. **The PEIR must explain any existing or anticipated problems with downstream flooding and explain why removing vegetation in these upstream areas would decrease the risk of flooding downstream.**

**c. Access impacts would be extensive.** None of these areas have existing road access and would require impacts from grading on steep hillsides and stream crossings in the MSCP and Rose Canyon Open Space Park. The PEIR states that these roads could be 18' wide to accommodate heavy equipment – and because portions of these maps are channelized and others have substantial riparian vegetation, heavy equipment would be required. These roads would quickly erode and cause additional environmental degradation from sedimentation and an increase in invasive plants.

**The PEIR must address these specific areas rather than push off any analysis of these major impacts to MSCP open space lands to a Substantial Conformance Review at some future date.** The unpaved SDG&E road that already exists in portions of Map 29 and 30 is very badly eroded. It has also led to bicyclists creating numerous additional major biking trails on the steep hillsides, leading to even more erosion. This area is within Rose Canyon Open Space Park and cannot be “fenced off” for from access. The PEIR needs to provide a map of potential road access needed through the areas on Maps 28-30 and explain the impacts, both short and long-term. Would storm water maintenance activities be done on a 3-5 year schedule? Will retaining walls be needed to construct the access roads? What will be done to prevent erosion for years to come once these roads are created? What will be done to prevent further degradation in the MSCP and Park by bicyclists, illegal encampments, and other human uses? How are these impacts justified given the lack of any risks to private property from flooding in these areas?

**d. The PEIR fails to explain how the impacts from access and staging areas to MSCP lands and Rose Canyon Open Space Park lands will be revegetated.** Simply removing exotics in the stream channel during maintenance activities (Mitigation measure 4.3.18 – p. 11) does not address the major detrimental impacts to both wetlands and uplands, which are almost sure to end up with far more invasive plants unless costly follow-up is done in essence in perpetuity. Elsewhere in Rose Canyon, the MWWD “mitigated” for both access and stockpiling impacts by hydroseeding the impacted areas with native plant species (in 2007 after the Miramar Trunk Sewer Repair and in 2008 for a repair in the Regents Road area). The areas in question (both where work was done and stockpiling areas) were all highly compacted by heavy equipment, and no watering occurred after hydroseeding. The result was that little to nothing grew from the hydroseeding, leaving the areas highly susceptible to erosion and further non-native plant invasion. The PEIR needs to provide justification backed up by scientific facts (not BMP boilerplate) for claims that access and staging areas won't be highly susceptible to erosion and further invasion by non-native plants. The PEIR must justify why throwing down some straw wattles and geotextile blankets and hydroseeding without any long term maintenance to either and no watering or would provide any significant beneficial result.

**e. The Site Close-out measures described in the Draft PEIR would ineffective or infeasible for the areas in Maps 27- 30 (and likely for many other areas).** (Site Close-out – p. 3-25 – 3-26) The Draft PEIR states: “Following completion of the maintenance activities and removal of all maintenance wastes and equipment, site close-out activities would, as appropriate, include: installation of erosion control devices such as straw wattles, geotextile blankets/nets, and/or hydroseed; implementation of on- site wetland/streambed restoration measures required by the PEIR, as well as any additional measures imposed as part of the SCR determination; and/or securing site from public

access.” Given the comments in c and d above, the PEIR needs to provide measures that are feasible, effective, and that the city will commit to funding long term.

**f. Mitigation done elsewhere or via payment to a mitigation bank simply permits further degradation of the local watershed. This is unacceptable.**

P. 10 – Mitigation account (measure 4.3.20) provides no assurance that the mitigation will occur in the watershed – or even within the city of San Diego – and even allows payment to a mitigation bank instead of actual mitigation. This is unacceptable. The PEIR must commit the city to conducting full mitigation in the affected watershed.

**f. We strongly support the comments of San Canyonlands and San Diego Audubon on the need for hydrology studies. We emphasize this for all the Rose Creek segments from Gilman to Mission Bay. We especially emphasize this for the areas in Maps 27-30. These areas have no risks from flooding, high habitat value, significant stretches of natural stream channel, high value as MSCP and open space park lands, and would suffer major environmental impacts from construction of access roads.**

**g. The statement on P. 4.1-12 that says the MSWSMP would not alter the natural land forms is not true. The PEIR needs to fully analyze these impacts.** As acknowledged on p. 3-25: *“limited grading would be conducted as necessary to allow equipment to be transported to work areas.”* Map 29 is just one example of this – it contains steep hillsides adjacent to riparian areas. Yet the PEIR fails to disclose that this area – and perhaps others – would require grading that alters the natural land form. Furthermore, as discussed above, the PEIR needs to acknowledge that many of the other actions connected with the MSWSMP are highly likely to alter the natural land form, including: compaction of the soil, loss of vegetation, and erosion resulting from access roads, stockpiling, and staging areas; increase in other human activities including new mountain biking trails and encampments; and the actual clearing activities in natural stream channels (such as those in Maps 27-29).

**All these impacts would cost large amounts of money to correct. The PEIR needs to identify the specific actions that would (or would not) be undertaken to correct these impacts, and where the funding will come from.**

**h. Appendix B (within Appendix B, see Appendix A, Table 1)**

**- The PEIR needs to explain how the maintenance methods proposed for Maps 27-30 are feasible given the following:**

**The PEIR describes two maintenance methods that would occur in Maps 27-30:**

Method 1: “Equipment such as a skid-steer or bulldozer enters the drainage using existing access and pushes the accumulated material with a bucket to a site within the drainage. The material is scooped up with a loader in the drainage or a Gradall along the top of the drainage bank, and loaded into a dump truck.”

Method 4: “No equipment enters the channel. A Gradall or excavator operates from the bank to scoop up the accumulated material from outside the drainage and load it onto dump trucks for offsite disposal.”

Clearly either of these methods would lead to massive environmental impacts in the areas in Maps 27-30, much of which is a fairly wide natural stream channel with substantial

amounts of riparian foliage, including large trees on either side, all in areas with no access roads. Furthermore, due to erosion impacts, these natural channels are in many places incised and narrow. This would potentially prohibit using a Skidsteer within the stream channel (without huge further impacts to the stream channel). Alternatively, having an excavator move along the bank would require cutting down dense riparian foliage, including large trees, along long stretches of stream bank!

As described elsewhere in the Draft PEIR, the full impact could involved construction of access roads and staging areas (and possible construction of a ramp) as needed for skidsteers, backhoes, Gradalls, excavators, loaders, dump trucks and bulldozers – as well as a crane were that necessary to lower the equipment into the channel! The scale of this impact is nowhere made clear in the Draft PEIR.

**- The PEIR needs to accurately explain the full extent of estimated disturbance for Maps 27-30. The estimated disturbance width in feet is given as:**

- 60' -68' in Gillman Canyon (Maps 27 and 28). This is mostly a natural stream channel.

- 20' – 100' for Rose Canyon (Maps 29 and 30) At least half the distance is natural stream channel – (see photo attached)

**The PEIR needs to also provide the length of impact.**

**These impacts – impacts up to 100' wide to long stretches of natural stream channels with mature riparian vegetation and no existing road access are not justified by anything in the PEIR. Again, we reiterate, the areas in Maps 27-30 should be removed from consideration in the PEIR. If any project is undertaking in these areas, it would require a full project level EIR.**

The stretch of stream channel in Map 30 would also require huge impacts. The PEIR states that the heavy equipment is likely to be required for stream channels, and the access road would need to be up to 18 feet (A, p. 9). Moreover, this area includes steep slopes, often leading down to the edge of the stream channel. The PEIR states (p. 9): “The terrain and vegetation through which the access road would pass will determine the amount of grading and vegetation removal necessary to achieve the necessary access.” The PEIR fails to address the substantial impact such a new access road would entail in steep slope areas that are also within the MSCP. Would this grading require paved roads? Retaining walls? In addition, the PEIR states: “Access for “in-channel” maintenance could require construction of a permanent or temporary ramp into the storm water facility from the external access.” (p. 9)

We reiterate the comment by San Diego Canyonlands that groups be given a minimum of 60 days to comment on proposed Individual Biological Assessment (IRA) and Individual Maintenance Plans (IMP).

Sincerely,

Deborah Knight  
Friends of Rose Canyon