

Master Storm Water Channel Maintenance Permit PEIR Recommendations For Decision Makers

Background The MSWMP poses unnecessary and costly impacts to over 70 acres of wetlands, wetlands functions, water quality, natural flood/erosion control, wildlife corridors, and ~29 acres of upland wildlife habitats.

- 1) **Please do not certify this PEIR as written.** The MSWMP documentation admits to diminishing important resource values including **unmitigated impacts to water quality**.
- 2) **The scope of the project should be reduced to focus only on areas that have been demonstrated to result in property damage from flooding.** This should save the City money. Staff has removed only a few targeted areas in Rose Canyon due to public comment.
- 3) **Establish a process to address the concerns and issues** being raised and the legal deficiencies of the PEIR.
- 4) **Please support a fair CEQA process with public review and comment on the details of each annual plan (or other appropriate interval). Use a “Process IV” with approval by the Planning Commission and appealable to City Council.** The current PEIR violates CEQA because it doesn't provide the necessary details for public comment such as maintenance methods, access roads, resource impacts and mitigation. The City proposes to provide the details for a list of channel locations on an annual basis but they **will not allow a public review period to comment on these details as required by CEQA!**
- 5) **Require that project impacts on water quality and biology and mitigation performance be evaluated and reported on an annual basis.**
- 6) **Thoroughly analyze alternative, win-win maintenance methods including:**
 - Opportunities to increase wetlands for flood and erosion control. Wetlands serve to slow and absorb storm water runoff, thus reducing downstream flooding. They also trap sediment and filter pollutants from runoff before it reaches our coastal waters. Implementation of the adopted Chollas Creek Enhancement Program would serve this purpose.
 - Restoration of incised canyon streams could also serve this purpose.
 - Low Impact Development techniques such as infiltration, conversion of impermeable surfaces to permeable surfaces, and detention basins where they could capture and filter runoff before discharge to the creek channels. Increased use of residential rain barrels could both reduce storm water runoff and provide a beneficial use of rain water to residents.
- 7) **Mitigation measures should be conducted as close to the project impact site as possible.** Mitigation should not be exported out of project areas especially away from urban areas where wetland filtration values, and urban greening are needed most.
- 8) **Giant reed, (Arundo donax) rhizomes should be certified dead before removal begins.** It has been proven that mechanical removal of live arundo causes rhizome fragments to spread and arundo to propagate throughout the creek system.
- 9) **Delete the “Enhancement” alternative** (mitigating by only removing invasive, non-native plant species in another location). This is a waste of money. Without replacement by native plant container stock the weeds will just grow back.

