

# California Native Plant Society

San Diego Chapter of the California Native Plant Society

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City of San Diego  
Myra Herrmann  
Development Services Center  
1222 First Ave MS501  
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DSDEAS@sandiego.gov

August 20, 2009

**RE:** Project #42891, Master Storm Water System Maintenance Program

Dear Ms. Herrmann:

The California Native Plant Society, San Diego Chapter (CNPS), appreciates the opportunity to comment on the draft EIR for maintenance of City of San Diego (City) storm water facilities.

The City has recommended a program to remove vegetation from areas within San Diego's creeks, which form the City's storm water conveyance system, for the purpose of flood control to reduce losses to property. The areas to be maintained include streams that have been channelized in the past (concrete or earthen) and detention basins. Over time some of these areas have filled with sediment and wetland vegetation has become established that provides habitat for birds and other wildlife, some of which are endangered. The City plans to remove the vegetation on a regular using bulldozers and other mechanical equipment. The bulldozers will require the creating of new access roads in some areas. The City plans to mitigate for the loss of wetland habitat by removing weeds and planting native plants in other areas, which may include payment into mitigation banks outside of the City.

We have identified alternative to the plan proposed by the document and ask that these be addressed in the final.

**Better analysis of the "No Project" Alternative:** the proposed PEIR does not demonstrate the need for the project or whether the proposed vegetation removal will rectify the need. The PEIR does not demonstrate that vegetation removal from an area will result in increased protection of property. For example, previous development in upstream flood plains may have so increased the likelihood of flooding that floods will occur whether or not the channel contains vegetation. If vegetation removal does NOT result in increased protection from flood damage, then the project is a waste of money and will unnecessarily degrade wetland environments.



*Dedicated to the preservation of California native flora*

The PEIR does not state what level of rain event the project is expected to provide protection from, (e.g., a 100-year flood). What criteria are used to decide what the “desired flood control capacity” goal is? (e.g., see page 3-21; many other pages state “desired flood capacity” without stating how this would be determined).

The PEIR does not evaluate potentially significant adverse environmental impacts of the project such as the possibility of increased erosion downstream from a cleared area, or destabilization upstream as a result of changing the flow of floodwater.

**Watershed Management Alternative** – the PEIR acknowledges that vegetation removal from streams will have significant unmitigated impacts on water quality, neighborhood character and will conflict with the goals of other City programs such as the Chollas Creek Enhancement Plan (page 4.1-9). The current PEIR ignores the potential for using Low Impact Development principles in the watershed and upstream creek stabilization; wetland development to reduce flood volume and reduce the frequency of maintenance required to remove sediment from the areas indicated; and use of hand crews for maintenance to avoid development of new roads.

We request that the City analyze flood water control at a watershed level in order to develop a flood control plan that has the least amount of habitat clearing and is coordinated with other City planning goals and policies. This plan would preferentially examine the potential for reducing the impact of possible floods by e.g., upstream infiltration, catchments in cisterns and rain barrels, use of permeable pavements, restoration of stream hydrology to dechannelize creeks, using energy dissipaters.

**Invasive weed removal alternative** - If vegetation removal is deemed necessary, the proposed project may achieve its goal by focusing on invasive vegetation removal. Many of the project maintenance locations have species including giant reed (*Arundo donax*), Mexican fan palm (*Washingtonia robusta*), salt-cedar (*Tamarix ramosissima*), and eucalyptus (*Eucalyptus globulus*).

### **Insufficiency of Mitigation**

The PEIR proposes to base the level of mitigation required on the frequency of maintenance. We find this insufficient for several reasons.

1) The amount of impacts caused by Low Frequency Maintenance (page 4.3-40) is expected to result in the removal of mature plants followed by re-growth, which would not become higher than 5-10 feet. Wetland regulatory agencies typically consider this to be a permanent impact to wetland habitat, since 5-10 ft tall trees are not functionally equivalent to mature trees. We recommend that appropriate mitigation be the expansion or creation of other areas in the same watershed.

2) Basing the type of mitigation only on frequency of maintenance fails to analyze the impact of the TYPE of clearing. Scraping below the soil surface to remove root systems would be expected to have a much greater impact than hand removal of a few non-native trees. We recommend that the PEIR take the TYPE of maintenance into account when describing mitigation and provide mitigation ratios for the specific types of impact3) The PEIR does not indicate on which maps a particular type and frequency of clearance is envisioned. Based on

the information provided in the PEIR, all vegetation could be scraped from every project site every year and remain consistent with PEIR guidelines. We doubt that this is in the intention, but have no basis for any other conclusion. The maps show extensive project areas within some watersheds, *e.g.*, the San Diego River. The PEIR does not indicate how impacts from this project would be mitigated for such an area, which conceivably could be completely devegetated according to the proposal. We request that there an adequate area be clearly identified and quantified for mitigation of this impact.

4) Using “enhancement” (removal of non-native plants elsewhere) as mitigation of permanent impacts caused by High Frequency maintenance (page 4.3-38) is inappropriate. The loss of wetland habitat and function is only properly mitigated by creation of new wetlands or possibly by restoration of severely degraded wetlands, preferably in the same watershed. Please remove “enhancement” from the paragraphs referring to mitigation for High Frequency Maintenance.

On page 4.3-40, the PEIR states that restoration/enhancement activities will take place at the uppermost regions of a drainage for most effective control of non-native species. This is not necessarily required for effective maintenance, which would depend on the species and whether its dispersal is primarily wind- or water- bourn. We recommend that mitigation take place as part of Watershed Management Plan as described above.

#### **Selection of equipment and access roads and proposed alternative**

The PEIR states that mechanical removal using equipment up to 12.5 feet wide will be used because it will cost less. However, no analysis was performed to support this statement; it is quite possible that hand clearing would cost less than creation of new access roads which will be needed in some areas in order to permit access by large equipment. Another alternative to this proposal is to identify and acquire the use of smaller “canyon-proficient” equipment, such as that successfully identified by MWWD for maintenance of the sewer system in canyons, which will reduce the impact of new access roads by limiting their width to 8 ft and would not require grading. We request that the PEIR analyze this alternative.

The impact analysis and proposed mitigation for the creation of new access roads is insufficient, as it does not address impacts to Land Use, Aesthetics/Neighborhood Character, Hydrology/Water Quality and other CEQA-required analyses. It inadequately addresses Biological Resources by stating only that mitigation will be carried out by off-site habitat acquisition, without specific assurances. It fails to address other impacts to Biological Resources from new road creation, including habitat fragmentation and introduction of new vectors for transmission of weeds.

We request that the PEIR identify and quantify all areas where new roads are thought to be necessary and conduct the appropriate impacts analysis.

The PEIR defines “Storm water facilities” as natural and constructed drainage channels. This PEIR needs to properly identify and map which areas are natural wetlands and which are manmade structures as defined by the City’s Biology Guidelines, which would allow mitigation ratios to be identified properly to ensure a “no net loss” of San Diego’s wetlands

The PEIR indicates that sediment controls would be called for in certain cases (e.g., page 3-17 Protocol #6; Page 3-26). We note that “temporary” erosion controls such as straw wattles often are manufactured with plastic netting that does not degrade and potentially causes damage to wildlife. Typically, such erosion controls are never removed from the project site (e.g., Juniper/Chocolate Canyon near Kalmia St). We request that the PEIR prohibit the use of plastic as a component of erosion control measures, regardless of whether they are intended to be “temporary” or not.

Page 3-18 Protocol #16 refers to the storage of hazardous materials. What hazardous materials are expected to be used in storm channel maintenance and which will be stored on site?

Page 3-20: What is meant by “dropping in” equipment?

Page 3-25: Under Sensitive Biological Resource Clearance, the current language indicates that pre-maintenance surveys would be conducted after clearing had already begun. Please rephrase this paragraph to indicate that surveys would occur BEFORE commencement of clearing.

Page 3-25 under Waste Management: Please remove the phrases “dump truck” and “vacuum/pressure truck”, as specifying them precludes the use of more environmentally sensitive procedures.

Page 4.1-15: The last paragraph under “program consistency” states that “no development would occur as a result” of the project. This is incorrect, as the PEIR states that roads will be developed in some areas for access. Please correct this statement.

Page 4.3-51 (and all other mitigation measures): Please add to the PEIR language that directs all mitigation measures to be included in construction documents to ensure implementation.

Table 4.3-10: Mitigation for Streambed/natural flood channel is considered to be “not applicable”. This is not acceptable, as wetland regulatory agencies (ACOE, RWQCB, and CDFG) routinely exercise jurisdiction over non-wetland waters and require minimum 1:1 creation as mitigation for impacts. Furthermore, many of the City-defined wetlands are un-vegetated. To not require mitigation for these wetlands would result in a NET LOSS to local ecosystems.

Footnote #1 states “*Mitigation done in advance through purchase of mitigation credits would be at a 1:1 ratio.*” This would effectively reduce all mitigation to weed removal and planting activities, since all the mitigation in the PEIR is effectively only enhancement to existing wetlands, and since there is no limit to the amount of mitigation that can be accomplished by purchase of credits, and whereas the project removes wetlands but does not effectively create or expand wetland area, this would result in a NET LOSS of wetlands.

We request the following changes:

1. Define mitigation to consist of a minimum 1:1 ratio of creation or Restoration (including soil excavation) **as currently defined** by the City of San Diego and resource agencies
2. Remove Footnote #1 from Table 4.3-10.
3. Provide mitigation ratio for streambed/natural flood channel impacts

4. Implement biological mitigation within same watershed as impacts.

**Pg. 11-1:** To ensure an appropriate level of design, implementation, and coordination of multiple City departments, we request that all “maintenance documents” (construction/maintenance plans) as described (Pg. 11-1 General mitigation #1) be required to be Grading Permits/Plans approved by the City Engineer (Development Services Department representative) (As described in City’s Biology Guidelines 2002, Pg 12, B. Identification of Mitigation Program). This will ensure all protocols will be addressed in the field for each channel’s “Individual Maintenance Plan” (IMP).

There is no adequate MMRP requirement addressing the need to mitigate for the spread of invasive species on and off-site. Invasive species that have the potential to be spread by maintenance activities (e.g *Arundo donax* as described in (Boland (2008) THE ROLES OF FLOODS AND BULLDOZERS IN THE BREAK-UP AND DISPERSAL OF ARUNDO DONAX (GIANT REED), Madrono 55: 216-222) should be required to be removed/killed prior to the beginning of proposed maintenance activities.

### **Comments on the Conceptual Wetland Restoration Plan**

Page 4: The Conceptual Wetland Restoration Plan (CWRP) does not demonstrate that adequate mitigation can be provided. III. Mitigation Site Description, A. Site Selection Process states “An initial search for wetland compensation sites revealed a number of sites... Subsequent sites will be identified, as required, to meet demand for wetland compensation which cannot be met by the initial sites.” The potential mitigation sites are identified by only the crudest descriptors: the name of the watershed (Table 1) and gross-scale maps (Attachments A – F) that provide no indication the location of actual potential mitigation sites. Based on the information provided in the CWRP, it is impossible to determine if the PEIR is workable. The assurance that “Specific acreages and locations of mitigation required for project impacts will be determined on a yearly basis” does not provide enough information for us to determine the effect of the project. **Please provide and document acreage and type of wetland vegetation that can be restored in each of the 13 watershed units.**

B. Potential Sites begins “ To the greatest extent practicable...”. Without defining what is practicable, this language renders the rest of the sentence meaningless. **Please remove such caveats from throughout the text unless a description of the specific circumstances under which purported action would not occur is described** (see also “whenever possible”, p. 14, “as quickly as practicable”, p. 20,

Tables 2, 3, and 4 provide for advanced mitigation for loss of disturbed wetland at a ratio of 0.5:1; this results in a net loss of wetland area, function and value. While 1:1 or lower mitigation ratios are proposed as credit for advanced mitigation in Tables 2 – 4, Table 5 fails to propose mitigation ratios higher than 3:1 to compensate for the loss of functions and values during the time lapse since impacts were incurred in 2004 – 2006. **Please modify wetland mitigation ratios to provide no net loss of wetland habitat and compensate for the time lapse since previous impacts.**

High frequency clearing is defined as occurring more often than every three years. Low frequency clearing is defined as occurring less often than every three years (p. 13).

Maintenance frequencies typically occur at three-year intervals (p. 2). Would this be defined as low frequency or high frequency clearing?

P. 13: The three rationales provided for abandoning “typically” (i.e. according to current federal and state regulation) required wetland creation at a ratio of 1:1 are not based on factual substantiation. 1) The continued use of channels for wildlife movement after clearing is speculative 2) The “historic return” of wetland vegetation to these channels after maintenance, if true (which is not documented) does not consider the change in the type and quality of vegetation nor does it preclude habitat conversion after the more frequent vegetation clearing sought under this PEIR. 3) The fact that maintenance activities have already occurred for many years is irrelevant as to whether the City should comply with state and federal regulatory standards for this project. **Please include 1:1 creation as mitigation for all proposed impacts or include research that shows that existing functions and values listed in the San Diego Basin Plan for each watershed impacted would be maintained under the proposed program.**

P. 13: Mitigation for High Frequency Clearing is proposed as restoration or purchase of mitigation credits, or creation. Creation is not seriously discussed in the report. The existing acreage that has actual restoration potential is not provided, as discussed above. Therefore, the purchase of mitigation credits appears to have the potential to be the primary source of mitigation, obviating the rest of this document. We must assume that purchasing mitigation credits will transfer wetlands out of coastal San Diego unless the PEIR **sets an upper limit on the purchase of mitigation credits for each watershed and document that these credits are currently available and will be available at the time of project implementation.**

P.14. Restoration is proposed for “highly degraded wetlands (i.e. areas infested with exotics). This definition is imprecise. Please quantitatively define what constitutes highly degraded wetlands. We propose “at least 90% cover of perennial exotics as determined by point-intercept transects” as an adequate definition.

Purchase of Mitigation Credits states “In some cases, mitigation credits would have a higher value than the impacted habitat.” Please provide a table comparing the types of mitigation habitat available in each mitigation bank, the wetland habitat for which it would provide mitigation, and the instances in which this is considered higher-value mitigation.

P. 15: Mitigation for Low Frequency Impacts is proposed to consist of exotic removal for a period of two years based on the statement “normally wetland vegetation re-establishes if the maintenance occurs at intervals greater than three years.” Change in dominant vegetation and loss of wetland function and values associated with loss of vegetation structure are not discussed. Please provide factual demonstration that removal of exotics would compensate for the loss of existing wetland functions and values resulting from vegetation removal every 3 to 5 years.

P. 16 Existing Functions and Services. The CWMP is based on the premise that existing wetland functions and services will be replaced by the proposed mitigation. Yet the functions and services of the 13 watersheds that will supposedly provide mitigation opportunities are discussed in one paragraph of generalities. Please a) specify the proposed restoration /

enhancement areas and b) provide a factual discussion of their existing ecological functions and services.

P. 18 Restoration specialist responsibilities are stated in one paragraph, but additional duties and responsibilities are sprinkled throughout the succeeding pages. Please include all responsibilities in this paragraph. The Restoration Specialist is not authorized to direct that additional restoration be conducted or maintenance practices be modified or discontinued. Please enable the Restoration Specialist to direct maintenance activities. The phrase "The restoration specialist must recommend sign off..." is ambiguous; please clarify that approval of the project by the restoration specialist is required for project sign off.

P. 19 "Areas to be designated for enhancement may support substantial native habitats" contradicts the statement on p. 16 that "areas proposed for restoration and enhancement are dominated by non-native vegetation." The PEIR indicates that overall improvement of a site by removal of trash, debris, and weeds improves overall habitat quality. This appears to mean that a one-acre site with 0.1 acre of weeds that are removed would be credited as one acre of mitigation. **Please specify that the acreage of wetland mitigation to be credited as restored or enhanced will be based on the actual area treated and not the total mitigation area and specify how this will be determined and documented.**

P. 24 – 28 Tables 8 – 13 provide plant palettes, each with the caveat that "species may be added or deleted from the palette depending on ... plant availability and cost." These tables are therefore meaningless. Please remove this language and specify that the supplying plant nurseries/ seed providers will be provided with adequate notification to ensure that the plant palette will be used.

P. 24 Southern riparian forest and riparian woodland are proposed to include openings dominated by native grasses and herbs with scattered shrubs; please clarify that wetland mitigation credit will not be provided for areas dominated by upland grasses, herbs, and shrubs. Southern riparian forest and riparian woodland is also proposed as mitigation for impacts to southern willow scrub and mule fat scrub, which typically lack such understory vegetation. This would result in the replacement of the dominant wetland vegetation types in the project area with a habitat type that is not appropriate in many areas. Please provide for in-kind restoration of southern willow scrub and mule fat scrub vegetation.

p. 29: "if temporary habitat disturbance is unavoidable, then restoration of and/or mitigation for the disturbed areas after project completion will be required." Please specify mitigation ratios and restoration timetables for all such impacts.

p. 30 Documenting pre-mitigation conditions calls for photo documentation. Please provide point-intercept data to establish that non-native and target species are present. Please use target species percent cover data to establish the acreage to be credited as mitigation (e.g., "20% target species cover over a 1-acre area would provide 0.2 acre of mitigation credit").

p. 32 The Maintenance Plan calls for removal of non-native plants, (p. 30) but Non-native Plant Control states that non-native plants will be removed "to ground level." This would not provide control for these species for species that can re-sprout. The section also states "there will be low tolerance for non-native plants" – this is meaningless. Please modify section to provide for quantitative control of non-native species.

p. 39 Enhancement does not provide success criteria beyond removal of targeted species. Under these conditions 100% cover of non-native grasses would be considered successful. Please revise success criteria to no more than 5% non-native cover.

## **Comments on the Biological Technical Report, Appendix C.1 and Vegetation/Wetland Delineation Maps**

- Executive summary P. B-1: [This report] does not include an analysis of every potential channel or facility that might be subject to impacts from future maintenance, which means the impacts could be understated." We request that all the potential impacts are evaluated, so that the impacts can be dealt with appropriately.
- Nutall's scrub oak (*Quercus dumosa*), a dominant species in chaparral, was identified as a sensitive species within the project boundaries, yet there is no mitigation for it. We request that this omission be fixed throughout the PEIR. (e.g., in Project Impacts p53).
- P.1 It is unclear what the impacts of the program are because the document **states that all the impacts are not listed**. We request a realistic estimate of all the potential impacts of the project, some of which are not going to occur, or a process set up within this document to create subsequent EIRs to address impacts unforeseen in this document and to create future mitigations for the unforeseen impacts. Given the incomplete analysis of impacts, the mitigation described by this PEIR is not acceptable, because it will allow future impacts to occur without consideration or mitigation.
- P.1: "The estimation of impacts to storm water facilities presented in this report should be considered a representation of potential impacts resulting from flood control maintenance..." We request to see a list of locations and boundaries in the project description, including the access roads that will have to be re-engineered so that equipment can enter.
- P. 2: "Mechanized equipment clearing would be utilized whenever possible to reduce costs". This statement appears to neglect other costs associated with mechanized equipment, which include construction of noise abatement fences during nesting season, and the creating and maintenance of access roads. We request that an assessment of costs of manual vs. Mechanized removal be made.
- P.2: "Depending on the terrain and vegetation density, **bulldozers** may be used to create paths."
  - Where is the impact analysis for this activity? Where are roads going to be built?
  - The document states that equipment up to 12.5 feet wide would be used. **We request an analysis of the width of access roads** that would be needed for this project, and a list be made of smaller-width equipment that can be used in order to reduce the amount of upland vegetation impacted by access roads. The Metropolitan Wastewater Department has successfully identified equipment that requires an access path of no more than 8 feet wide that is sufficient for maintenance of sewer lines in canyons, and we expect that the Storm Water

department would have equal success.

- The document does not appear to describe the surfacing or construction concept for access roads. Please add this information.

P.3: Selective maintenance: the second sentence of this section: "The two methods...." Four methods are described.

P.4-5: Access: "All created paths would incorporate BMPs during and after maintenance activities." Where is the mitigation described for impacts caused by access path creation?

P. 5: Wetland Impact Authorization Process: **Where does the mitigation actually occur?** The document states that the surveyor writes up the specific compensation, and the agencies identify additional measures that would bring the project into compliance, and any mitigation performed that year is tabulated in an annual report. Please include the **actual directive to perform the mitigation, and follow-up to determine whether the mitigation was successful, and steps to take if mitigation is not successful.**

P.15: mapping . What was the **minimum mapping unit for vegetation?** Was the standard minimum mapping unit of 0.5 acres for most vegetation and 0.1 acre minimum mapping unit for special features followed?

P. 16: "Formal jurisdictional delineation was not carried out, in that soil pits were not dug" even though the soil criteria were used as a reason to reject wetlands as waters of the U.S. Soil pits are dug to look for characteristic features of wetland soils. The City of San Diego defines wetlands to be defined as those areas with wetland hydrology, vegetation OR soils.

(In addition, the certification/qualification section (p. 89) does not make it clear whether any of the people performing the delineation were formally trained to do so.)

P. 17: Survey limitations. **Given the presence of sensitive species, focused surveys should have been performed.** Given the ready availability of CNDDDB, SDNHM Plant Atlas, and CNPS and other experts in the area, it would be fairly straightforward to **map** the locations of all sensitive species in the project area.

p. 30-44: Sensitive resources. The presence of sensitive species from any list should have triggered focused surveys to precisely determine what remedies needed to be pursued.

p. 44-53: Regional and Regulatory Context. Given the presence of a listed species, the Endangered Species Act should be listed.

P 53: Project Impacts:

- Road impacts are not covered, so the vegetation impacts are incomplete
- Nuttall's scrub oak is not mentioned in the impacts, although it was identified as a sensitive species.
- Given the lack of focused surveys for sensitive species, it may be argued that impact to some of these species will be "significant." Quantifying the impact would be needed in order to determine appropriate mitigation.
- P. 66: "...mitigation measures that require relocation or replanting in the event a

substantial number of sensitive plants would be lost in the course of maintenance.”

- A. These should be quantified as much as possible ahead of time.
  - B. Please indicate that planting should follow the City’s guidelines.
  - C. Please describe a **monitoring program** to insure that any mitigation program is successful.
- P.67: Water Quality impacts of the project will be significant, due to the loss of filtering by the plants, yet mitigation for this is not addressed. This is a critical shortcoming in the document.

### **Mitigation Measures.**

P. 74: The **“restoration” described here is properly labeled “habitat enhancement”**, according to the City of San Diego Biology Guidelines (2002 amendment). Traditionally, “Enhancement” is defined by the removal of invasive species, and the replanting with appropriate native plants to ensure compliance with the City of San Diego’s Erosion Control Regulations (Municipal Code Section 142.0411). Wetland Restoration is defined as “an activity that re-establishes the habitat functions of a former wetland. An example is the excavation of agricultural fill from historic wetlands and the re-establishment of native wetland vegetation”. Restoration implies increasing the area of wetlands, not simply improving the quality of existing wetlands. **Please re-define all mitigation that involves only weed removal and planting as “habitat enhancement” and provide appropriate mitigation measures to ensure no net loss.**

P. 74: The document proposes to divide maintenance projects on a “high frequency (greater than every 3 years)” and “low frequency (more than every 3 years)” basis and to establish a lower stringency of mitigation for “low frequency” areas. However, the document also states that the wetland vegetation is expected to recover only to 5-10 feet after 3 years, after which it may be cut again and the project implies that this would not be considered a permanent impact. We expect that keeping the height of wetland vegetation such as willows below 5-10 feet would be a permanent impact on habitat and the uses of the habitat by wildlife. We request that the time interval that separates HIGH from LOW frequency be increased to 10 years.

P. 74: What impacts are proposed to occur in “non-vegetated channels”, which by definition are already free from vegetation?

P. 76: A location for all mitigation and restoration needs to be identified prior to the project going forward; however, no location is mentioned.

P.76: Removal of invasive species: 2 years is insufficient for ensuring lack of return of several species . *E.g.* species such as Brazilian peppers can resprout for years despite repeated Roundup treatments.

P.83 and following: mitigations for road construction in uplands and wetlands need to be specified.

## Comments on the Maps - Appendix C.2

- Very few of the maps show any **access points**. Since the PEIR discusses the impacts of clearing roads for access, the maps should show the entrance points for the channels, and include these as part of the Project description.
- The use of indistinguishable reds and oranges for four or five different vegetation communities makes it difficult to determine whether the maps are accurate. Please use a better choice of colors, or captions within the maps.
- Map 2. The vegetation/delineation stops under Bernardo Oaks Drive. Unless there is a culvert there, the map should continue under the road.
- Map 3: The vegetation/delineation stops under Rios Road. Unless there is a culvert there, the map should continue under the road.
- Map 05a shows the center of the channel cutting into Black Mountain Road road. Please align figures to provide better accuracy.
- Map 08: Even in the aerials, it is evident that the channels continue under the freeway interchange, yet the channel maps (and the JD) stop at the edge of the interchange.
- Map 09: There appears to be a culvert under Roselle St, because the channel occurs on both sides.
- Maps 11, 15: These show proper mapping of the channel under the overpasses, which is the format appropriate for the other maps.
- Map 58a: It looks like the channel extends under the road, yet it is not mapped.
- Map 59: the channel looks like it extends right under Mission Gorge Rd, yet it is not mapped.
- Map 62 It is difficult to understand how a channel with such a radical shift between a narrow dirt bottom and a wide concrete bottom could carry water. We suggest you revisit the site and see if the map is accurate, since it has been drawn it as if they are two different channels when it's obvious from the map (and from Google) that they are one channel.
- Map 89: On the map provided and on Google, it looks like the channel runs under Market St. It's not mapped as such.
- Map 92: This map is difficult to understand. It looks like a continuous channel on the aerial, and it is unclear why there is a round segment, while the ditch leading up to it is left out. Is there an unlabeled drain structure here?
- Map 98: The channel appears to run under Ocean View Blvd, but it is not mapped.
- Map 121 and 122: the channel lines overlap the roads.
- Map 131: The square structure between 30<sup>th</sup> and Fern Ave is not a channel, and from Google, it is vegetated. What is this, and how does it fit into the project?
- Map 138 and Map 137a: the nature of this map shows a t-intersection that, from the

shading and the map, is not where the two channels join. The channels appear to join to the west. This area needs to be either remapped or labeled.

- Maps 164-172 do not provide anything more than the names of the biggest streets. As such they are difficult to locate on Google, and it is hard to determine their accuracy or any mistakes. Please label these maps so that each structure can be found and examined in other images.

We thank you for the opportunity to comment on this action, and hope that we may work with you to improve the environment in San Diego.

Sincerely,

Carrie Schneider, Conservation Chair  
California Native Plant Society, San Diego

Cc: Tara Hansen, Executive Director, California Native Plant Society  
Brent Hall, President, California Native Plant Society  
Terrance Dean, Army Corps of Engineers, Los Angeles District