



Groundwork SAN DIEGO

Chollas Creek

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May 15, 2017

VIA EMAIL

SanDiego@waterboards.ca.gov

Rebecca Stewart
San Diego Regional Water Quality Control Board
2375 Northside Drive, Suite 100
San Diego, CA 92108

RE: R9-2017-0056 comments rstewart: 225222

Dear Ms. Stewart,

Thank you for the opportunity to comment on the "Tentative Settlement Agreement and Stipulation for Entry of Administrative Civil Liability Order No. R9-2017-0056 in the Matter of the City of San Diego Construction Storm Water Management Program." Groundwork San Diego supports the City of San Diego's proposal to defer half of the penalty amount for Supplemental Environmental Projects (SEPs). We are particularly supportive of the "Chollas Creek Restoration Opportunities Assessment" SEP as we have been working closely with the City of San Diego to provide input to guide this project and will continue to support the City on their efforts.

This project will build on current efforts to identify stream restoration sites and opportunities throughout the Chollas Creek Watershed. This project is aligned with Groundwork San Diego's mission to "bring about the sustained regeneration, improvement and management of the physical environment through the development of community based partnerships."

Sincerely,

Leslie Reynolds

Leslie Reynolds
Groundwork San Diego

LOS PEÑASQUITOS LAGOON FOUNDATION

P.O. Box 940
Cardiff by the Sea
CA, 92007



May 15, 2017

Attention: Rebecca Stewart
San Diego Water Board
2375 Northside Drive, Suite 100
San Diego, California 92108-2700

Subject: R9-2017-0056 comments rstewart: 225222

Dear Ms. Stewart:

The Los Peñasquitos Lagoon Foundation (LPLF) supports the City of San Diego's (City) proposed Supplemental Environmental Project (SEP) as a means to help settle Civic Liability Order R9-2017-056 by providing \$630,000 in funding to support the Los Peñasquitos Lagoon Inlet Restoration Project (Project). Submitted to the Water Board by LPLF in October 2016, the Project provides the most effective strategy for protecting and preserving the Beneficial Uses afforded by Los Peñasquitos Lagoon (LPL), a Marsh Natural Preserve. Benefits generated by the proposed SEP include: Restoring hydrologic connectivity between the watershed, lagoon, and ocean; Improving sediment management efforts for a 303(d)-listed waterbody; Enhancement of the LPL and its riparian corridors through trash and debris removal; and Improved water quality through enhanced tidal connectivity and dewatering of areas within the Lagoon that receive perennial inputs of dry weather flows that contribute to habitat conversion, establishment of invasive species, and increased vulnerability of local communities to vector-borne brain encephalitis.

Following beach nourishment efforts in 2012 performed under the Regional Beach Sand Project (RBSP) II, the inlet at LPL has received significant increases in sand volume and elevated beach profiles within in the inlet area and along Torrey Pines State Beach. Numerous efforts were required in 2013, 2014 and 2016 to open the lagoon inlet and lower beach elevations to drain lagoon waters and restore tidal mixing within LPL. 2016 alone required six separate efforts to open the inlet mechanically and removed over 75,000 cubic yards from the Lagoon's inlet, more than three times the average volume removed annually before RBSP II. LPLF has provided numerous lines of evidence linking the increase in sand volumes within the inlet and along Torrey Pines State Beach with RBSP II and believes this additional sediment has modified baseline conditions at the Lagoon inlet, especially following the recent El Niño event. As a result, annual budgets to maintain the inlet are inadequate and must be augmented to re-establish baseline conditions within the inlet and beach. Funding the Project through the City's proposed SEP will provide this service and prevent further impairment of LPL and its Beneficial Uses.

LPLF requests that the San Diego Water Board strongly consider the SEP proposed by the City so that LPLF, California State Parks (CSP) and the City can continue their collaborative efforts to protect and preserve the Beneficial Uses of LPL and to work toward de-listing this impaired 303 (d) waterbody. Inlet work at LPL to restore tidal circulation through mechanical excavation of the Lagoon's inlet area is fully permitted and ready for implementation. As the fund recipient, LPLF will work directly with Water Board staff, CSP and the City to ensure that the Project is implemented in a timely and efficient manner and will provide reporting and metrics of success that include water quality monitoring data needed to track the Project's performance.

If you have any questions, please feel free to contact me at (760) 271-0574 or mikehastings1066@gmail.com.

Sincerely,

A handwritten signature in cursive script that reads "Mike Hastings".

Mike Hastings
Executive Director
Los Peñasquitos Lagoon Foundation



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Create.
Conserve.**

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May 15, 2017

San Diego Water Board
2375 Northside Drive, Suite 100
San Diego, CA 92108-2700

To Whom It May Concern:

On behalf of The San Diego River Park Foundation, I am writing to express that the San Diego River Park Foundation is an eager partner for the City of San Diego's Supplemental Environmental Project (SEP) #2 San Diego River Restoration and Arundo Removal, included in proposed Order No. R9-2017-0056.

The San Diego River Park Foundation is a community leader in data collection and analysis related to the health of the San Diego River watershed, including 17.5 miles of the River within the City of San Diego. We believe that the surveys, trash removal, invasive removal and restoration components included in the SEP partnership with the San Diego River Park Foundation will have measurable beneficial impacts on the health of the San Diego River and its surrounding ecosystem.

We are very willing partners in working with the City in this way to implement the SEP item #2, and look forward to this opportunity to complete the work.

If you have questions about the San Diego River Park Foundation's role or proposal, please don't hesitate to contact me.

Sincerely,

Rob Hutsel
President and CEO, The San Diego River Park Foundation
(619) 297-7380
rhutsel@sandiegoriver.org

The San Diego River Park Foundation is a 501(c)(3) charitable organization.
EIN 01-0565671

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State of California • Natural Resources Agency

Edmund G. Brown Jr., Governor

DEPARTMENT OF PARKS AND RECREATION
San Diego Coast District
4477 Pacific Highway
San Diego, CA 92110

Lisa Ann L. Mangat, Director

May 15, 2017

Attention: Rebecca Stewart
San Diego Water Board
2375 Northside Drive, Suite 100
San Diego, California 92108-2700

RE: Support Letter R9-2017-0056 Comments Rstewart: 225222

Dear Ms. Stewart:

I am writing to ask your support of Supplemental Environmental Project (SEP) by the City of San Diego (City) to settle Civil Liability Order R9-2017-0056. It is my understanding that through this SEP, that the City will provide the Los Peñasquitos Lagoon Foundation (LPLF) with \$630,000 to fund the Los Peñasquitos Lagoon Inlet Restoration Project (Project). The Project was submitted to the San Diego Water Board for consideration as a SEP in October 2016 by LPLF and continues to be a priority project needed to help protect and preserve the Beneficial Uses and ecosystem services afforded by Los Peñasquitos Lagoon.

California State Parks (CSP) owns and manages nearly all of the Los Peñasquitos Lagoon as a part of the Torrey Pines State Natural Reserve. Recognized as State Natural Preserve, Los Peñasquitos Lagoon is among the highest level of protection lands within California. The Lagoon and its transitional uplands provides numerous Beneficial Uses that include critical habitat five listed bird species, 35 rare and endangered plants, and is an essential stop for migratory birds using the Pacific Flyway. Los Peñasquitos Lagoon also provides key ecologic services that include improved water quality, attenuation of floodwaters, passive recreation, and carbon sequestration.

Following beach nourishment efforts in 2012 performed under the Regional Beach Sand Project (RBSP) II, the inlet at Los Peñasquitos Lagoon has received significant increases in sand volume and elevated beach profiles within in the inlet area and along Torrey Pines State Beach. Numerous efforts were required in 2013, 2014 and 2016 to open the lagoon inlet and lower beach elevations to drain lagoon waters and re-establish tidal mixing. CSP was required to expend emergency funds numerous times to support these efforts and request support from neighboring State Parks districts. The year 2016 alone required five separate efforts to open the inlet mechanically and removed over 75,000 cubic yards from the Lagoon's inlet, more than three times the average volume removed annually before RBSP II. LPLF has provided numerous lines of evidence linking the increase in sand volumes within the inlet and along Torrey Pines State Beach with RBSP II and believes this additional sediment has modified baseline

conditions at the Lagoon inlet, especially following the recent El Niño event. As a result, annual budgets to maintain the inlet are inadequate and must be augmented to re-establish baseline conditions within the inlet and beach. The proposed project will provide this service and prevent further impairment of Los Peñasquitos Lagoon.

CSP has worked closely with the LPLF and watershed stakeholders to manage Los Peñasquitos Lagoon and will continue to coordinate efforts directly with LPLF should the proposed project receive funding, including the issuance of the Right of Entry Permit and in-kind services that include staff time allocated to sensitive species/ habitat protection and public safety. The project is consistent with other planning documents for Los Peñasquitos Lagoon that include State Park's General Plan for managing the Torrey Pines State Natural Reserve, the updated Los Peñasquitos Lagoon Enhancement Plan, and the Water Quality Improvement Plan for the Los Peñasquitos Watershed.

If you have any questions or need further information please contact my office at (619) 952-3895 or email me at darren.smith@parks.ca.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Darren Smith", written in a cursive style.

Darren Smith, District Services Manager, San Diego Coast District

cc: Robin Greene, District Superintendent
Lisa Urbach, North Sector Superintendent
Reading File