

Comments and Questions for City of San Diego - La Jolla Natural Park Reservoir EIR 2021

Overview

The City proposes to access the site by trucks accessing from Exchange Place to Country Club Drive and then constructing a haul road through the park to the top of the hill where the new reservoir would be built underground.

There are very significant environmental impacts with this approach. The duration of the project would be for 2 ½ years. First, the street access up Exchange Place is extremely dangerous and additionally adding more than 4,000 truck trips would increase this danger significantly. There is a blind corner with a very narrow right of way and many pedestrians without the advantage of a sidewalk.

Second, placing the haul road through the park will require more than 50,000 cubic yards of fill to create a bridge and the road. There are 77 plant species in the park including some which are threatened or endangered such as Ashy spike moss, coastal barrel cactus, natural scrub oak, summer holly, white coast *ceanothus* and coastal sage. The land bridge is proposed to be built over a canyon area that has been mapped as an ephemeral stream and will have impacts on riparian habitat.

Third the park is home to many species of birds including the gnatcatcher, red shouldered hawk and Least Bell's Vireo (*Vireo bellii pusillus*), two of which are threatened species in California.

Fourth, the park is considered one of the best hiking trails in San Diego. Hundreds of residents and visitors use these trails every day. The community needs to know what the impact will be on these trails both during and after construction. There has been staff discussion the trails will be closed during construction and that there will be a permanent fence around the reservoir after construction. We need to see the perimeters of that fence, the impact on the trails and what above ground structures will be built.

The EIR identifies that the proposed project will result in decreased impacts associated with the removal of an above ground tank and the portion of the existing road. This finding is not representative of actual conditions. Although the existing tank is above ground, it is not visible from the overlook or the trail, However, the proposed tank location along with the parking lot, grade and vegetation change will significantly alter the natural viewshed.

We need to see a comprehensive analysis of the alternative access approaches to the site and what alternative sites may be available. This should include the Upper Hillside access and using Romero Drive and the existing paved right of way to the site. The current plan will destroy 5.5 acres of the 42-acre park for 2 ½ years and result in significant environmental and recreational damage.

1. The Abandoned Lower Exchange Reservoir:

The project should include the demolition and excavation of the existing abandoned reservoir and its ancillary improvements including the stairs down to Exchange Place. The land should be returned to its natural state as a passive park/open space. Since this is owned by the Water Utility it should be transferred to the General Fund with the equivalent of a no build easement.

2. Existing Reservoir:

The existing reservoir and related improvements including access roads will be demolished and the land will be returned to its natural state. We would like to see detailed plans regarding the grading and planting plan for the restored site. Restoration plan should be developed so as to preserve the privacy of the homes adjacent to the existing reservoir,

The existing eucalyptus grove will be removed and replaced with native plants and vegetation.

3. Geotechnical Information:

The City needs to provide adequate geotechnical information regarding the structural support for the new reservoir especially considering the soil conditions in the area.

4. Existing Country Club Pump Station:

The appearance and condition of the existing country club pump station needs to be significantly enhanced including its fencing to shield it from public view and the maintenance of its adjacent area needs to be enhanced,

5. Traffic Plan and Mitigation:

The City needs to present a comprehensive traffic plan to ensure community safety as the City moves a significant amount of construction equipment and trucks up the very narrow Exchange Place including construction of a new pipeline in the right of way. As part of the mitigation for the project, the City shall install a permanent sidewalk from Exchange Place to the Country Club pump station. The City shall also explore acquiring right of way from the Country Club to straighten out the curve at Exchange Place.

After the project is complete the City will resurface all roads from Exchange Place to Country Club, Romero, Brodiaea Way and Encelia Drive.

The new pipelines are planned to be constructed in the park. We would like to see the alternatives analysis to see if they could be constructed in existing right of way.

Questions / Comments

- What elements of the Reservoir will be visible after completion?
 - The MOU between PUD and Parks references allowance for fencing and one building. The EIR does not reference either of these features. It needs to be clearly identified if these will be part of the proposed project.
 - Provide post-construction renderings of the project from the bench looking down and Village of La Jolla looking up. The renderings need to include all above ground features including the parking lot, vents, accesses, and fencing.
 - The EIR identifies easements that extend in all directions around the proposed tank. How will these easements be designated (i.e., will fencing be installed) and how will these affect public access?
 - The EIR states that a weather station will be added to the existing communication tower. This tower was added without any environmental review (The City identified it was exempt due to security requirements), but it was placed in the direct line of sight of the bench overlook looking toward the cliffs of Black's Beach and Torrey Pines - the prime view. How will the communication tower change with the weather station (i.e. will the height increase, what is the size of the equipment, etc.). The tower's placement and accurate depiction of all equipment on the tower should be included in the evaluation of impacts to the recreational experience and viewshed.

- Traffic:
 - Explore alternative access for Trucks and/or residents. Access up from Pacific Beach through Via Casa Alto-Upper Hillside Drive? Use as alternative access for residents?
 - How will traffic be handled during heavy truck activity?
 - The traffic study does not adequately address safety and impacts on Country Club Road, particularly at the intersection of Country Club, Mar Avenue, and Soledad Avenues, which is currently a busy intersection.
 - The current plan anticipates 14,000 truckloads for moving earth from the excavation from the tank location down Brodiaea Way and Romero Drive past two hairpin bends to dump soil to form the temporary access road at the beginning of the project and presumably a good portion vice versa at the end of the project. Can the city provide an estimate of trucks/day travelling through this stretch during the earth movement stages?

- What is the pedestrian/hiking access plan during and after construction?
 - How will The Bench viewpoint off Encelia Drive be accessed before and after?
 - How will access for hiking up/down the hill during and after construction be handled since hiking trails currently merge at the proposed tank location?

- What is the future use of the Lower Reservoir near Soledad Avenue – Al Bahr
 - How will it be finished?
 - Will it be retained as open park space?

- Earth stabilization
 - What mitigation steps have the city planned to ensure land stability during and after excavation for a 3M gallon tank on a promontory with steep slopes in an area where a landslide creating a 30ft crevasse occurred within 100 meters of the proposed tank location? (April 2008; on the East side of the gate across the service road extension of Encelia)
 - How will soil runoff be controlled during and after construction?
 - Currently, the location of the temporary access road is at the exact location of a culvert for water run-off from up the hill during heavy rains. What measures will the city take to prevent destabilization of the access road during heavy rains?
- Explore and comment on: Instead of one large reservoir, consider rebuilding current reservoirs + potentially adding one more?
- Consider alternative location for the reservoir. Fronting 7362 Brodiaea has been proposed which is closer to road and less impact on Park, view and hiking.
- Reconsider haul road to lessen environmental impacts.
- Need: Construction management plan.

Environmental Questions/Comments from the California Native Plant Species (CNPS)

- References needed for data supporting lack of California Gnatcatchers in La Jolla Natural Park. Audubon Society will likely bring up that this is prime habitat for the California Gnatcatcher (<https://www.audubon.org/field-guide/bird/california-gnatcatcher>).
- Why are list 1 and 2B species (for example *Comarostaphylis diversifolia* ssp. *diversifolia* (Summer holly), and *Ceanothus verrucosus* White coast ceanothus)) in the Park not listed as being impacted?
- The proposed off-site mitigation in Peñasquitos Canyon should be revisited to identify in-kind mitigation (local/coastal sage scrub). Additional placement of the fill across the canyon will result in temporal losses that will require mitigation per the 404/401 permits. It is encouraged any temporal loss mitigation be conducted locally e.g. Pottery Canyon and/or Bird Rock bike path area?
- The revegetation efforts the City has conducted to mitigate past impacts in the area have been largely unsuccessful., there is a concern that the proposed mitigation efforts will be similarly unsuccessful. The Revegetation Report identifies that temporary irrigation will be required with a plant establishment period of 5 years. How will this affect public access to this area during the mitigation period?
- City to provide a list of plants they intend to use during re-vegetation to avoid planting of non-native species such a beaver-tail cactus that were planted by the city during previous revegetation efforts?
- What precautions are being taken with the "land bridge" to ensure it will not slide or disrupt the downstream riparian area? How will surface water be diverted during atmospheric rivers?

Mitigation Options:

- Provide Lower Reservoir off Soledad Avenue as park for the people.
- Keep trails open during and after construction.

- Country Club Drive, just above La Jolla Knoll - reduce curve + add sidewalk along Country Club Drive to Soledad Avenue.
- Remove existing eucalyptus grove in the area of the upper reservoir to be abandoned and replaced with native plants and vegetation.
- Clean up existing pump station on Country Club Drive.
- Eliminate above ground telephone poles running east to west in the park.
- Add sidewalks. Retain cobbled sidewalks.

Comments/Questions for from numerous sources including Jack McGrory, Diane Kane, Cindy Hazuka, Kathleen Harrison, Catherine Lazarides, Maxine Snyder, Tom Fetter, Patrick Ahern and more.