

## Recreation

The Draft states the following:

“It should also be noted that, although there is evidence of dispersed recreational activity in La Jolla Heights Natural Park, the park is designated for the purpose of protecting natural open space and public access is not authorized. The Project would not preclude the continuation of existing uses, with the exception of restriction of access to the project site during construction. Accordingly, no impact related to recreation would occur.”

Contrary to the DEIR statement, the impact on recreation would be significant for the following reasons: (1) While the trails are dispersed at the lower elevations of the Park, they all converge at Encelia Drive at the upper elevation, and the placement of the project (the same area as Encelia Drive) results in closure of the park to recreational use by the public. (2) The DEIR states that public access is not authorized, this statement is incorrect; the Park and Recreation signs on the trail heads show hiking in the park is allowed (see attached photos). While no survey was done to determine the amount of use, it is significant during weekend mornings. Thus, the DEIR’s statement that the project would not preclude the continuation of existing uses is incorrect. Analysis of the impact of closure to recreational use must be conducted before accepting the DEIR’s incorrect statements. The San Diego Parks and Recreation Department needs to protect the park’s recreational existing use, it is one of the rare open spaces that hikers can use.

## Cumulative Impacts

One item not considered is the impact the project will have on the old and frail water supply piping system of La Jolla. There are ongoing pipe breaks occurring all the time in La Jolla. Observations of water leaking in the cracks of the roads are common. With the increased elevation of the project, water pressure is expected to increase and thus expected to cause additional problems for the piping system. A detailed study should be conducted to review this cumulative issue so that La Jolla is not faced with a significant system wide breakage all occurring at the same time.

Even if pressure reducers are used as part of the project, higher flows in the area could also have an impact on the frail piping system. As such the overall reconstruction of the piping system should be included as part of the EIR so that these activities are not done in a piece meal fashion. This is not a minor issue for La Jolla.

## Surface Water Quality

The DEIR states:

“No known surface water quality data are available for the project site or adjacent areas, with surface storm and irrigation flows typically subject to variations in water quality due to local conditions such as runoff rates/amounts and land use.”

This statement in the DEIR can be analyzed by using data observed by recreational use of the area, the downstream trail entrances usually exhibit sand and clay deposits on the streets of Al Bahr Drive and Mecca Drive after significant rainfall events.

Additionally, the following statement from DEIR indicates that the surface water quality impact due to the project is accepted:

“While no sediment-related impairment is identified for downstream receiving waters, project-related erosion and sedimentation could potentially affect downstream water quality and associated wildlife habitats.” Since the surface soils of the area exhibit significant erosion currently, construction related sediment runoff could be significant. The project should consider stormwater retention measures during the construction even if flows will not change that much.