CALIFORNIA COASTAL COMMISSION
SAN DIEGO DISTRICT OFFICE
7575 METROPOLITAN DRIVE, SUITE 103
SAN DIEGO, CA 92108-4402
VOICE (619) 767-2370
FAX (619) 767-2384

Th16d

ADDENDUM

November 2, 2020

To: Commissioners and Interested Parties

From: California Coastal Commission
San Diego Staff

Subject: Addendum to **Item Th16d**, Coastal Commission Permit Application **#6-20-0160 (Caltrans/SANDAG)**, for the Commission Meeting of November 5, 2020.

The purpose of this addendum is to recognize comments received from the applicants on October 28, 2020 and to make minor corrections and clarifications to the staff report.

I. CORRESPONDENCE RECEIVED

The applicants have submitted a letter with attachments dated October 28, 2020 in response to the Commission staff report, which are included in the "Correspondence" file for this item. The letter states that 2.736 acres of salt marsh mitigation from within the eastern portion of the W-19 site was previously agreed upon by the applicants for use by Southern California Edison (SCE) and the San Dieguito River Park Joint Powers Authority (JPA) to satisfy some of their previous mitigation requirements within the San Dieguito Lagoon. This portion of the restoration proposed to be credited to SCE and JPA would accordingly be deducted from the amount of mitigation credit available to the applicants upon completion of the project. The arrangement for the 2.736 acres was not specified in the application and accompanying documents for the project; however, after reviewing the letter and coordinating both internally and with the applicants Commission staff has determined that updating the project to reflect this arrangement is appropriate.

II. CHANGES TO STAFF REPORT

Staff recommends the following changes be made to the above-referenced staff report. Deletions shall be marked by ~~strikethrough~~, and additions shall be <u>underlined</u>:

1. On page 1, the first paragraph shall be revised as follows:

The W-19 San Dieguito Lagoon Restoration Project consists of the restoration of two former wetland sites within San Dieguito Lagoon, the 140-acre W-19 site and the 14-acre W-6 site. The proposed project is intended to supplement other adjacent restoration efforts as part of the overall restoration of San Dieguito Lagoon. Successful restoration of the W-19 site is intended to provide wetland mitigation for future infrastructure projects, including highway, rail, bike, and pedestrian projects identified in the North Coast Corridor Public Works Plan and Transportation and Resource Enhancement Program (NCC PWP/TREP), approved by the Commission in June 2014. The NCC PWP/TREP is a single, integrated document for comprehensively planning, reviewing, and permitting the transportation, community, and resource enhancement projects within the North Coast Corridor extending from La Jolla to Oceanside along the North San Diego County coastline. In addition, ~~a~~ portions of the restoration project ~~is~~ are intended to provide wetland mitigation ~~for~~ that will satisfy some previous mitigation requirements that Southern California Edison and the San Dieguito River Park Joint Powers Authority have within the lagoon, as well as a future bridge replacement and road widening project along El Camino Real.

2. On page 2, the second full paragraph shall be revised as follows:

The W-19 restoration will establish ~~60~~ 44 acres of tidal salt marsh habitat west of an existing utility corridor, ~~15~~ 16.3 acres of brackish marsh east of the utility corridor, 5.6 acres of mudflat habitat, 9.7 acres of open water, and ~~4.4~~ 4 acres of riparian habitat along with ~~4.9~~ 3.3 acres of riparian enhancement. The project also includes 28 acres of coastal sage scrub restoration and ~~20~~ 26.5 acres of transitional habitat between the wetlands and uplands. Restoration will occur pursuant to the Habitat Mitigation and Monitoring Plan (HMMP) developed by the applicants in collaboration with Commission staff and other state and federal regulatory agencies. The HMMP includes detailed requirements regarding construction scheduling, grading, planting, irrigation, maintenance, monitoring, and success criteria, among other topics, and generally facilitates implementation of the project and assessment of its success. As of the date of this staff report, the HMMP is nearly but not yet finalized, so **Special Condition 3** requires the applicants to submit the final HMMP to the Executive Director for review and approval prior to issuance of the permit. After the success criteria for the mitigation are met, the San Dieguito River Park Joint Powers Authority (JPA) will be responsible for long-term management of the W-19 site.

3. On page 28, the second full paragraph shall be revised as follows:

Applicants Caltrans and SANDAG propose the W-19 San Dieguito Lagoon Restoration Project to supplement SCE's existing restoration efforts on adjacent sites developed pursuant to the San Dieguito Wetland Restoration Plan (Plan). Successful implementation of the proposed project will provide wetland mitigation credit for future infrastructure projects planned by the applicants, including highway, rail, bike, and pedestrian projects identified in the North Coast Corridor Public Works Plan and Transportation and Resource Enhancement Program

(NCC PWP/TREP), approved by the Commission in June 2014. In addition, a portion of the restoration project is intended to provide mitigation for a planned bridge and road widening project along El Camino Real. An application for that project has yet to be submitted by the City of San Diego, the project proponent, to the Commission for review and approval. While the subject wetlands restoration is intended to provide mitigation for such future transportation infrastructure projects, those projects and their associated impacts are not included within the project description for this project and thus are not analyzed in this report. Finally, the applicants intend for two parts of the proposed wetland restoration to be credited toward SCE's and the JPA's mitigation requirements under CDP 6-04-088. The first is the restoration of the 13.5-acre W-6 site, as described below. The second is 2.736 acres of salt marsh mitigation from the eastern portion of W-19 to satisfy the mitigation requirements for impacts from the previous construction of the Coast to Crest trail and freshwater treatment ponds pursuant to the San Dieguito Wetland Restoration Plan. Specifically, Special Condition 8(h) of CDP 6-04-088-A10 required those 2.736 acres to be restored by December 2016, or implementation of a back-up mitigation plan by December 2017. Neither has occurred, which constitutes non-compliance by SCE and the JPA with their permit. According to the JPA and the applicants, the draft EIR for the proposed W-19 restoration project was almost completed by the end of 2016, and trying to permit and implement the back-up mitigation plan in the same area was not feasible, so they continued to focus on moving forward with the subject project to satisfy the mitigation requirements (see Correspondence). The portions of the proposed restoration that are credited to SCE and the JPA would accordingly be deducted from the amount of mitigation credit available to the applicants upon completion of the project.

4. On page 28, the third full paragraph shall be revised as follows:

As part of the restoration of W-19, the applicants propose to establish ~~60~~ 44 acres of tidal salt marsh within the W-19 site west of an existing utility corridor, ~~15~~ 16.3 acres of brackish marsh east of the utility corridor, 5.6 acres of mudflat habitat, 9.7 acres of open water, and ~~4.4~~ 4 acres of riparian habitat along with ~~4.9~~ 3.3 acres of riparian enhancement (see **Exhibit 3**). The project also includes 28 acres of coastal sage scrub restoration and ~~20~~ 26.5 acres of transitional habitat between the wetlands and uplands. The project will result in the excavation of approximately 1.2 million cubic yards of soil and 150,000 cubic yards of non-native vegetation from within the site in order to create the required elevations for wetlands restoration. Some of this excavated material may be used as part of the recontouring of the site, but the majority of it will be trucked to an existing disposal site used previously by SCE that is located in an upland area of the lagoon complex approximately 0.4 mile south of the W-19 site. After construction is complete, the disposal site would be capped with salvaged topsoil and revegetated with coastal sage scrub.

5. On page 30, the first and second full paragraphs shall be revised as follows:

The project would first try to incorporate the utilities currently affixed to the poles with existing electrical facilities within the existing utility corridor to the west (see **Exhibit 6**). If this is infeasible, then a ~~20-foot-wide~~ 25-foot-wide expansion of the utility corridor would be required in order to install new utility poles. In either scenario the utilities will connect with existing electrical infrastructure located to the north of the site. Once the utilities have been relocated, the existing poles will be removed and discarded at a location outside of the coastal zone.

Removal of the existing poles and installation of any new necessary poles will require minor ground disturbance (approximately 5-8 square feet) and corresponding new impervious areas for concrete foundations. ~~The area of the relocated utilities consists of primarily bare, disturbed ground with scattered invasive species and intermittent bushes of coastal sage scrub. Because the pole relocation sites are within the larger W-19 restoration area, the coastal sage scrub habitat in the vicinity will be enhanced after project completion. Additionally, relocation of the poles will remove the existing poles from within existing, functional saltmarsh, riparian, and coyote bush habitat and consolidate them within an existing utility corridor.~~ Poles removed as part of the relocation effort are currently in disturbed upland habitat, which will be restored to wetland and upland habitats after the line is removed and consolidated into the larger existing utility corridor.

6. On page 33, after the second full paragraph the following paragraph is added:

   Equally significant to the restoration of San Dieguito Lagoon has been the San Dieguito River Park Joint Powers Authority (JPA). Formed in 1989, the JPA is a multi-jurisdictional government entity that provides organizational structure and stability for efforts to preserve and restore San Dieguito Lagoon. The JPA has worked closely with SCE and other partners to secure the lagoon as the chosen mitigation site for the SONGS permit, has purchased significant acreages of private property for restoration and public recreation, including portions of the proposed project site, and will serve the critical role as long-term manager of the restored lagoon.

7. On page 38, the third full paragraph shall be revised as follows:

   As described above, the proposed project will establish ~~60~~ 44 acres of tidal salt marsh, ~~15~~ 16.3 acres of brackish marsh, 5.6 acres of mudflat habitat, 9.7 acres of open water, and ~~4.4~~ 4 acres of riparian habitat along with ~~4.9~~ 3.3 acres of riparian enhancement. The project also includes establishment of 28 acres of coastal sage scrub within upland areas and ~~20~~ 26.5 acres of transitional habitat between the wetlands and the uplands. The proposed project would also restore approximately 10 acres of wetland habitat and 4 acres of upland/transitional habitat on the W-6 site. To address the tidal prism effects of the restoration project and disruption of sand supply to local beaches, the project includes deepening an existing sand trap, and dredging of the inlets of W-19 and W-6 and the interior of W-19 on a periodic basis following significant storm events in order

to prevent the buildup of sediment within W-19. Removal of this sediment will avoid potential large-scale habitat conversion and/or water quality issues within the established wetland areas and also provide beach-compatible sand for replenishment of nearby beaches. To further mitigate disruption of sand supply, the applicants also propose an initial 5,000-cubic-yard deposition of beach-compatible material along adjacent beaches, followed by subsequent 5,000-cubic-yard depositions every ten years over a 50-year period. This CDP, as conditioned, would authorize up to 20 years of periodic deposition, with the option to apply for a CDP amendment authorizing further continued deposition into the future. Thus, because the intent of the project is to return degraded lands to a state consistent with historic conditions of the San Dieguito Lagoon, specifically wetland, riparian and transitional habitat; prevent significant build-up of sediment which would negatively impact these restored habitats; and provide beach-compatible sand to nearby beaches as mitigation for the tidal prism effects of the project, the Commission finds that the proposed restoration and maintenance dredging is consistent with the definition of "restoration" and constitutes filling and dredging for restoration purposes consistent with Section 30233(a)(6).

8. On page 39, the first full paragraph shall be revised as follows:

The finding that the proposed project constitutes "restoration purposes" is based, in part, on the assumption that the proposed project will be successful in restoring the various historic habitats and ecological processes and, thus, increasing habitat values. To assure the success of the restoration project, the applicants have worked collaboratively with Commission staff as well as other state and federal regulatory agencies on the development of a Habitat Mitigation and Monitoring Plan (HMMP) to facilitate implementation of the project and assessment of the success of the project. The HMMP includes detailed information on: construction scheduling and implementation including access and best management practices (BMPs); grading; planting; irrigation; maintenance; construction monitoring; implementation of the restoration including monitoring protocols and performance standards for each of the habitat types and reference sites to measure success of the restoration; reporting; adaptive management; a program to release mitigation credits from the mitigation bank once restoration has been deemed successful; and a long term management plan to ensure continued success of the restoration following release of the mitigation credits. <u>After the success criteria for the mitigation are met, the JPA will be responsible for long-term management of the W-19 site.</u> Available mitigation credits will be based on the number of acres available for each established or restored habitat type on the proposed compensatory mitigation sites.

9. On page 46, the third full paragraph shall be revised as follows:

The existing sand trap was initially constructed by, and is maintained by, SCE as part of the overall San Dieguito Wetland Restoration Plan. The sand trap helps collect entrained sand in a single location where it can be more easily removed instead of allowing it to flow upstream into the lagoon. ~~As~~ <u>When</u> the trap fills with

sand, maintenance dredging is conducted to remove ~~the~~ approximately 16,000 cubic yards of accumulated sand and place it on adjacent beaches. ~~To date~~ Since the initial opening of the inlet in 2011, a total of ~~16,000~~ 45,000 cubic yards of sand ~~has~~ have been removed from the trap over three dredging events and deposited on adjacent beaches. The proposed project will deepen the sand trap by approximately two feet to create a deeper trap to effectively capture more sand. ~~This deepening of the trap by two feet is expected to generate approximately 4,200 cubic yards of beach-compatible sand, which will be transported to adjacent beaches for nourishment.~~ Because the entrainment of sand within the deepened sand trap will not be a constant process, it is impossible to predict the ~~amount~~ volume or frequency of future dredging and deposition events ~~as a result of the deepened sand trap~~. However, by deepening the sand trap the project will provide an initial 4,200 cubic yards of beach-compatible material, and each subsequent maintenance dredging of the trap will generate approximately 4,200 cubic yards more beach-compatible material than if the trap were not deepened.

10. On page 65, the following item shall be added to Appendix A:

CDP File 6-04-088-A10