

March 23, 2020

Del Mar Union School District
Mr. Chris Delehanty, Executive Director of Capital Programs and Technology
11232 El Camino Real

Reference/Subject: Del Mar Heights Rebuild Project

Dear Mr. Delehanty:

The City of San Diego (“City”) Planning Department has received the Notice of Intent to adopt a Mitigated Negative Declaration prepared by the Del Mar Union School District and distributed it to applicable City departments for review. The City, as a Responsible Agency under CEQA, has reviewed the Notice of Intent to adopt a Mitigated Negative Declaration and appreciates this opportunity to provide comments to the Del Mar Union School District.

We look forward to continued coordination with you. Following are comments on the Notice of Intent to adopt a Mitigated Negative Declaration for your consideration.

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**Transportation and Stormwater Department – Mark Stephens, AICP, Associate Planner –
mgstephens@sandiego.gov, 858-541-4361**

Initial Study/Draft Mitigated Negative Declaration

Pages 77 – 80, 3.10 Hydrology and Water Quality. This section should also note that the project site is in the Los Peñasquitos Watershed Management Area, which is addressed through the Los Peñasquitos Watershed Management Area (WMA) Water Quality Improvement Plan (WQIP). (Adding this to the response to Question “a” is recommended.) The WQIP sets forth highest priority water quality conditions to be addressed, and includes sedimentation of Los Peñasquitos Lagoon. The State of California approved a Total Maximum Daily Load (TMDL) for Los Peñasquitos Lagoon Sedimentation. This background underscores the importance of effectively addressing erosion and other sources of sedimentation in the watershed.

Page 119, 3.19 Utilities and Service Systems. Since the project includes construction of new drainage outfall facilities, the response to Question “a” should include a cross reference to discussion of this topic in Section 3.10 Hydrology and Water Quality. That student enrollment capacity is not expected to increase has less to do with potential drainage impacts than construction activities and ultimate development, the location and extent of pervious and impervious surfaces, and design of drainage facilities and best management practices employed.

Appendix C Biological Resources Assessment

Pages 2 – 3, Project Description. The last two paragraphs in this section present additional description of replacement of two existing storm water outfalls and related measures planned to address erosion and sedimentation concerns, including improving eroded gullies, providing additional native vegetative cover, and installing best management practices such as three bioretention basins. Preparation of a Storm Water Pollution Prevention Plan (SWPPP) to address erosion and sediment during the construction phase is also noted. Completion

and effective implementation of the SWPPP and replacement of the two existing drainage outfalls with effective best management practices to reduce erosion and sedimentation are important priorities for this project.

Planning Department – Rebecca Malone, Senior Planner – rmalone@sandiego.gov, 619-446-5371

City residents have contacted the Planning Department regarding the project's wildfire evacuation risks. Please let us know if you would like to discuss any additional details regarding the public comment received.

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Thank you for the opportunity to provide comments on the Notice of Intent to adopt a Mitigated Negative Declaration. Please contact us with any questions regarding the contents of this letter or if the Del Mar Union School District would like to meet with City staff. Please contact Rebecca Malone, Senior Planner, directly via email at rmalone@sandiego.gov or by phone at 619-446-5371.

Sincerely,



Heidi Vonblum, Program Manager
Planning Department

HV/asd

cc: Reviewing Departments (via email)
Review and Comment online file