

January 30, 2010

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City of San Diego Development Services Center  
1222 First Avenue, MS 501  
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Via email: jszymanski@sandiego.gov

Dear Mr. Szymanski:

SUBJECT: SDAS comments on Aldine Drive Slope Stabilization DMND, Project No. 152162

The San Diego Audubon Society is concerned with the planned revegetation and maintenance of the project site after grading. The Biological Resources Report for the project, on page 9 states that the project is adjacent to the MHPA and that it encroaches into the MHPA. On page 10 it recites the MHPA adjacency guidelines, including

“All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials, and other elements that might degrade or harm the natural environmental or ecosystem processes within the MHPA.”

But the Project and the MND fails to include measures that are essential to assuring that the MND will not release invasive plant species into habitat areas and the MHPA. Thus the MND fails to satisfy the adjacency guidelines of the MSCP and fails to support its assertion that it would reduce the impacts to below a level of significance.

#### HOTTENTOT FIG REMOVAL

On page 3, the MND states “as part of the project the area would be graded and the Hottentot fig would be eradicated.” Grading will not eradicate Hottentot fig. It just breaks it up, spreads it around, and replants it where ever the soil is spread or moved. When subsequent irrigation is provided for the revegetation the Hottentot fig will aggressively sprout out from all of the fragments left in the soil, quickly dominating the site. The Hottentot fig must all be eradicated long before the grading occurs. Grading should not start until it is all completely dead, down to the roots. It should then be scraped to the roots and taken to the landfill to make sure. None of those scrapings should remain on site. All fragments of the Hottentot fig and its roots should be removed from the site. After that the grading can begin. Even with that the mitigation measures need to specify that any Hottentot fig appearing on the site will be eradicated for several years. Unless this provision is included in the mitigation, the MND can not support its assertion that the MND would reduce the impacts to below a level of significance. Please add this provision.

#### POST CONSTRUCTION REMOVAL OF OPPORTUNISTIC WEEDS

After grading, almost all construction sites are soon dominated by opportunistic invasive weeds. These weeds produce huge quantities of seeds that spread to adjacent areas with every wind, in the clothes of every worker that crosses the area, and in the coats of any animal that crosses the area. That will happen at this project also. The MND needs to include a provision that will require strict control of weeds on the site before they are able to spread their seeds. This control must be provided during construction and for years after the construction. That is the only way to keep these weeds from invading the adjacent habitat areas and MHPA. Unless this provision is included in the mitigation, the MND can not support its assertion that the MND would reduce the impacts to below a level of significance. Please add this provision.

#### USE OF NON-NATIVE PLANTS IN THE REVEGETATION OF THE PROJECT SITE

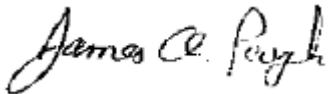
The Biological Resources Report, on page 8, specifically recommends that “any proposed revegetation efforts be accomplished with the use of native plant species.” Unfortunately the DMND states, on page 3, “The project is proposing a combination of native and introduced drought tolerant plants in the landscaping palate...” Doing this will provide roots and seeds of introduced plant species adjacent to habitat area, adjacent to the MHPA, and into an encroachment into the MHPA. This clearly violates the provision of the MSCP mentioned above. Rather than reducing the impacts, this provision of the DMND specifically and intentionally increases the impact of the project. Unless the planting of only appropriate native species is required in the MND it can not support its assertion that the MND would reduce the impacts to below a level of significance. Please specify the use of only appropriate native plant species in the MND.

#### CONCLUSION

We strongly urge that the MND incorporate the three changes mentioned above. If they are not changed, the MND can not support its assertion that the MND would reduce the impacts to below a level of significance. In that case we strongly urge that the MND be withdrawn and an EIR be provided that will reduce the impacts to below a level of significance.

In case of questions or follow-up, the undersigned can be reached at 619-224-4591 or [peugh@cox.net](mailto:peugh@cox.net) .

Respectfully,



James A. Peugh  
Conservation Committee Chair