



## County of San Diego

# TIJUANA RIVER VALLEY REGIONAL PARK HABITAT RESTORATION PLAN

STATE CLEARING HOUSE NO. 2023110494

## Response to Comments

### Introduction

The County prepared a Draft Initial Study (IS)/Mitigated Negative Declaration (MND) for the Proposed Project, which was circulated for a 31-day public review period pursuant to requirements of Chapter 3, Section 15073(a), of the California Environmental Quality Act (CEQA) Guidelines. The review period gives agencies, organizations, and members of the public the opportunity to review the Draft IS/MND and provide comments on the document and the environmental analysis presented therein. The 31-day review period commenced on November 17, 2023, and ended on December 18, 2023. During the review period, the County received comments from four agencies and comments from 24 members of the public.

All letters commenting on the Draft IS/ MND for the Tijuana River Valley Regional Park Habitat Restoration Plan Project (State Clearinghouse No. 2023110494) have been reproduced and are included in this section, followed by the County of San Diego, Department of Parks and Recreation's (County DPR's) responses to those letters. Additionally, several comments made in response to the circulation of the IS/MND raised similar issues so two Master Responses were prepared to address those general issues. The individuals and agencies from whom a comment letter was received during the public review period are listed in the below table. Each issue that was raised within each comment letter has been assigned a consecutive number that corresponds to a response number. In order to assist in the location of comment letters and responses, the respective names of the authors of the comment letters are indicated prior to each comment letter response. Revisions to the IS/MND resulting from these comments are represented in ~~strikeout~~ and underline.

Letter	Commenter	Date(s)	Comment Number(s)	Page
<b>Agencies</b>				
A	United States Fish and Wildlife Service (USFWS)	December 14, 2023 December 18, 2023 December 21, 2023	A-1 through A-7	6
B	California Department of Fish and Wildlife (CDFW)	December 11, 2023	B-1 through B-2	12
C	California State Parks, Tijuana River National Estuarine Research Reserve (TRNERR)	December 18, 2023	C-1	14
D	City of San Diego Stormwater Department	December 18, 2023	D-1 through D-2	16
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F	Andrea Murphey	November 29, 2023	F-1	22
G	Cary Herschberger	November 30, 2023	G-1	24
H	Cristina Shepherd	November 29, 2023	H-1	26
I	Dane Crosby	December 6, 2023	I-1	28
J	Dwayne Snider	December 17, 2023	J-1	30
K	Elizabeth McMahon	December 13, 2023	K-1 through K-3	32
L	Eric Langdon	December 10, 2023	L-1	36
M	Erika Bird	December 9, 2023 December 11, 2023	M-1 through M-2	38
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O	Hernando Suasa	November 28, 2023 December 17, 2023	O-1 through O-2	44
P	Judy Collins	December 7, 2023	P-1 through P-3	47
Q	Kathy Chambers	November 28, 2023	Q-1 through Q-2	49
R	Lenora Porcell	December 18, 2023	R-1	52
S	Leon Benham	December 6, 2023 December 7, 2023 December 11, 2023	S-1 through S-3	54
T	Martha Baylon-Futterman	December 11, 2023	T-1	61
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W	Patrick Dasis	November 28, 2023	W-1	69
X	Ruby [No last name given]	November 28, 2023 December 17, 2023	X-1 through	71
Y	Susan Arciaga	November 28, 2023	Y-1	74
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BB	Von Partlow	December 6, 2023	BB-1	84

## Master Responses

Several comments received during the public review period raised similar issues. The following Master Responses are provided to address those comments.

### Master Response MR-1 (Senate Bill 507 Study)

Many comments were received regarding concerns related to a separate project, referred to by commenters as the Senate Bill 507 (SB 507) Study. The SB 507 Study, formally known as the Tijuana River Valley Needs and Opportunities Assessment, was completed by the County of San Diego in 2020. The goal of the SB 507 Study was to review and assess potential management strategies to address cross-border flows of sewage, trash, and sediment coming into the Tijuana River Valley from Mexico. Ultimately, the SB 507 Study identified 27 potential projects that could be implemented to address these concerns. These projects primarily consisted of capital infrastructure projects such as water treatment and diversion infrastructure, trash capture infrastructure, sedimentation basins, and detention basins. During the development of the SB 507 Study projects, the County received some feedback from the public in opposition to some infrastructure projects, specifically the detention basins. The SB 507 Study also included habitat restoration efforts, water quality monitoring, and soil sampling, however, these projects received widespread support from the community and stakeholders.

The IS/MND for the Proposed Project was posted on the DPR webpage during the public review period. The same webpage also included links to the SB 507 Study and associated projects. Given the email subject lines, language within the comments, and the reference to “sewage ponds” by many commenters, the comments appear to be misplaced and intended to be comments for the infrastructure projects included in the SB 507 Study rather than the large-scale habitat restoration effort in the Proposed Project. After receiving initial comments indicating potential confusion between the two efforts, DPR removed the SB 507 Study from that webpage and reached out to each individual to clarify the description of activities included in the Proposed Project. The general concerns related to the SB 507 Study noted by the commenters include smells, quality of life, and health issues related to sewage and sewage ponding in the Tijuana River Valley. The general economic, environmental, and social concerns regarding that separate study are noted, but the comments do not specifically address the Proposed Project activities, or the adequacy of the environmental analysis contained in the IS/MND for the Proposed Project. Additionally, County staff have offered to meet with commenters regarding both SB 507 Study and the Proposed Project concerns. Although all comments received during the public comment period are included in this Final IS/MND for consideration by the County prior to making a final decision on the Proposed Project, no additional response regarding general concerns related to the SB 507 Study is required, and no changes to the IS/MND are required in response to these comments.

### Master Response MR-2 (Project Opposition)

Several comments were received indicating general project opposition, stating “the plan” 1) lacks historical context, 2) would harm habitat and the river environment, and 3) incorporates environmental injustice by taking away public access opportunities and increasing standing ponds of sewage. Although the SB 507 Study referenced in MR-1 was not specifically mentioned in these comments, the nature of these comments suggests they may have also

been misplaced and directed towards the SB 507 Study rather than the Proposed Project. This Master Response MR-2 has been prepared to address these comments in the case that they were intended for the Proposed Project. First, the Proposed Project, the Tijuana River Valley Habitat Restoration Plan (HRP), and the IS/MND prepared for the HRP, provide an extensive description of the Project Area, including historic and current uses within the Tijuana River Valley Regional Park (TRVRP), from its pre-historic and historic context to the current uses and environmental conditions that exist within the Project Area (See pages IS-1 through IS-31 of Attachment A to the MND). This historical context and existing conditions were used to inform the HRP and the analysis within the IS/MND.

To clarify the Proposed Project components that are the subject of the IS/MND, the HRP prioritizes and implements phased habitat restoration activities within the TRVRP. Through the HRP, invasive non-native plant species and trash and debris would be targeted for removal, and native plant restoration would occur over several phases. Although the commenters do not specify how the Proposed Project activities would harm habitat and the river environment, the IS/MND provided a full evaluation of the potential environmental impacts of the Proposed Project pursuant to the California Environmental Quality Act (CEQA), including a detailed discussion in the Biological Resources section. Mitigation to address any potential impacts of the Proposed Project is incorporated into the Mitigation Monitoring and Reporting Program (MMRP) (Attachment C to the MND).

Further, as it relates to habitat and the natural environment, expected benefits of the Proposed Project include removal and maintenance of invasive non-native plant species in the area, successful treatment and removal of invasive non-native plants, reestablishment of native plant species and communities, trash removal, enhanced water quality and flow, reduced concentration of chemicals and pollutants, improved sediment deposition regimes, reduced risk of flooding, increased ecosystem diversity and species abundance, and improved recreational experiences.

The Proposed Project's impact associated with recreational uses was also evaluated in the IS/MND (see page IS-96 of Attachment A to the MND). Although habitat restoration activities associated with the Proposed Project would occur within and adjacent to trails and recreation areas throughout the TRVRP, the Proposed Project would not impact access to, or contribute to the deterioration of, the formal trail network or recreational activities within the TRVRP. Further, the Proposed Project includes requirements for public notification/postings in the event any areas will have temporary closures or that should be avoided during the restoration activities. These closures would be temporary in nature and occur within separate phases while the work is completed.

It is also unclear why commenters believe the Proposed Project would lead to increased sewage ponding in the TRVRP. No activities are proposed by the HRP that would increase the amount of sewage generated or impede the treatment of sewage. Rather, by removing invasive species, trash, and root masses, ponding in general in the TRVRP would likely reduce as a result of the Proposed Project.

Finally, although these comments are general in nature and do not address the adequacy of the IS/MND, the comments are included in this Final IS/MND for consideration by the County prior to making a final decision on the Proposed Project. The IS/MND, including page IS-8 of Attachment A to the MND, has been updated to provide clarity regarding the description of the activities associated with the Proposed Project.

**LETTER A – UNITED STATES FISH AND WILDLIFE SERVICE (USFWS)**

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**From:** Eng, Anita <anita\_eng@fws.gov>  
**Sent:** Thursday, December 14, 2023 12:39 PM  
**To:** CEQA, CountyParks  
**Cc:** Zoutendyk, David  
**Subject:** [External] attn: Kiran Seibel - Request for Extension

A-1 [ Good afternoon Kiran,  
I'm writing to request an extension on the Dec. 18, 2023 deadline for public comment on the Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the Tijuana River Valley Regional Park Habitat Restoration Plan. Given anticipated staff leave around the upcoming holiday, we would like to submit our comments on or before January 12, 2024. If the County is able to accommodate this request, it would be greatly appreciated.  
thank you,  
Anita

**Anita Eng**  
Fish and Wildlife Biologist  
U.S. Fish and Wildlife Service  
2177 Salk Avenue, Suite 250  
Carlsbad, CA 92008  
(571)547-3203\*  
anita\_eng@fws.gov  
(she/her)

*\*Please email to schedule a call or meeting if needed.*

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**From:** Eng, Anita <anita\_eng@fws.gov>  
**Sent:** Monday, December 18, 2023 12:29 PM  
**To:** CEQA, CountyParks  
**Cc:** Zoutendyk, David  
**Subject:** [External] Re: [EXTERNAL] RE: attn: Kiran Seibel - Request for Extension

A-2 ] Hi Megan,  
We will do that. Thanks for the reply.  
Anita

**Anita Eng**  
Fish and Wildlife Biologist  
U.S. Fish and Wildlife Service  
(571)547-3203  
anita\_eng@fws.gov  
(she/her)

*\*Please email to schedule a call or meeting if needed.*

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**From:** Doran, Megan E <MeganE.Doran@sdcounty.ca.gov> on behalf of CEQA, CountyParks <CountyParksCEQA@sdcounty.ca.gov>  
**Sent:** Thursday, December 14, 2023 2:25 PM  
**To:** Eng, Anita <anita\_eng@fws.gov>; CEQA, CountyParks <CountyParksCEQA@sdcounty.ca.gov>  
**Cc:** Zoutendyk, David <David\_Zoutendyk@fws.gov>  
**Subject:** [EXTERNAL] RE: attn: Kiran Seibel - Request for Extension

**This email has been received from outside of DOI - Use caution before clicking on links, opening attachments, or responding.**

Hi Anita – Thank you for your email. At this time, we will not be formally extending the public review period for the Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the Tijuana River Valley Regional Park Habitat Restoration Project. You can continue to submit comments to this email address beyond the end of the public review period, and we will review and include in the final environmental document as feasible.

Thank you,  
Megan

Megan Doran  
Land Use/Environmental Planner, Resource Management Division  
County of San Diego Parks & Recreation  
5500 Overland Avenue, Suite 410  
San Diego, CA 92123  
Cell: (619) 909-6309  
[www.sdparks.org](http://www.sdparks.org)



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**From:** Eng, Anita <anita\_eng@fws.gov>  
**Sent:** Thursday, December 14, 2023 12:39 PM  
**To:** CEQA, CountyParks <CountyParksCEQA@sdcounty.ca.gov>  
**Cc:** Zoutendyk, David <David\_Zoutendyk@fws.gov>  
**Subject:** [External] attn: Kiran Seibel - Request for Extension

Good afternoon Kiran,  
I'm writing to request an extension on the Dec. 18, 2023 deadline for public comment on the Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the Tijuana River Valley Regional Park Habitat Restoration Plan. Given anticipated staff leave around the upcoming holiday, we would like to submit our comments on or before January 12, 2024. If the County is able to accommodate this request, it would be greatly appreciated.  
thank you,  
Anita

**Anita Eng**  
Fish and Wildlife Biologist  
U.S. Fish and Wildlife Service  
2177 Salk Avenue, Suite 250  
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(she/her)

*\*Please email to schedule a call or meeting if needed.*





**United States Department of the Interior**

**U.S. FISH AND WILDLIFE SERVICE**

Ecological Services  
Carlsbad Fish and Wildlife Office  
2177 Salk Avenue, Suite 250  
Carlsbad, California 92008



In Reply Refer to:  
23-0028030\_CEQA\_SD

*Sent Electronically*  
December 21, 2023

Megan Doran, Project Manager  
County of San Diego, Department of Parks and Recreation  
5500 Overland Avenue, Suite 410  
San Diego, California 92123

**Subject:** Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the Tijuana River Valley Regional Park (TRVRP) Habitat Restoration Plan (Proposed Project)

Dear Megan Doran:

A-3

The U.S. Fish and Wildlife Service (Service) is writing to provide comment on the County of San Diego's (County) Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the Tijuana River Valley Regional Park (TRVRP) Habitat Restoration Plan (Proposed Project). We received your email allowing us to submit comments after the end of public review period on December 18, 2023, and appreciate your flexibility. The Proposed Project is a Habitat Restoration Plan (HRP) for restoration activities on primarily County-owned or managed parcels located within the TRVRP. The stated objective of the HRP is to identify, prioritize, and implement phased large-scale restoration. By developing a comprehensive HRP, invasive non-native plant species would be targeted for removal, and native plant restoration would occur over several independent phases.

The primary concern and mandate of the Service is the protection of fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and threatened and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Federal Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 et seq.), including habitat conservation plans (HCP) developed under section 10(a)(1)(B) of the Act. The mission of the Service is working with others to conserve, protect, and enhance fish, wildlife, plants and their habitats for the continuing benefit of the American people. Our comments and recommendations are based on our knowledge of sensitive and declining vegetation communities and species in the Tijuana River Valley. The County of San Diego and City of San Diego participate in the HCP program through their respective Multiple Species Conservation Programs (MSCP).

A-4

We are supportive of habitat restoration included in the Proposed Project in anticipation of improved conditions for habitat and wildlife, particularly in the vicinity of critical habitat for the federally endangered least Bell's vireo (*Vireo bellii pusillus*, LBV) and habitat known to support federally endangered Quino checkerspot butterfly (*Euphydryas quino quino*). Based on our conversations with County staff, it is our understanding that the Proposed Project described in the IS/MND does not

- A-4  
(cont.)

include development of recreational facilities associated with Treatment Areas 8 (rentable venue), 10 (active recreational complex, bike skills park, campgrounds), 11 (campgrounds, equestrian center), and 12 (campgrounds, rentable venue) as described in Table 4 of the November 15, 2023, Draft Initial Study-Environmental Checklist Form. In addition, it is our understanding that impacts from a formal 22.5-mile trail network described in the IS/MND are not intended to be offset by the measures proposed in the IS/MND mitigation framework. The Service recommends revisions to the document to clarify that the mitigation framework currently provided in the MND is not meant to address impacts to listed species or habitats from the development of recreational infrastructure and to clarify which activities described in the IS/MND are part of the Proposed Project.
- A-5

Regardless of whether the recreational infrastructure described in the IS/MND is part of the Proposed Project, the Service requests further coordination with the County on the siting and design of these recreational components when funding for project phases becomes available and recommends the coordinated evaluation of proposed and alternative trail alignments and the preparation of a Habitat Management Plan encompassing all restored areas. Concurrent planning of recreational features, including proposed trails, and long-term management of restored habitat in this area would ensure that passive recreational uses are compatible with regional MSCP conservation objectives.
- A-6

The County and City’s MSCP plans do not provide authorization for L.B.V within wetlands and waters under the jurisdiction of the U.S. Army Corps of Engineers. We recommend that the County coordinate with the U.S. Army Corps of Engineers and the Service to ensure that potential effects to L.B.V from the Proposed Project are appropriately addressed pursuant to the Act.
- A-7

We appreciate the opportunity to comment on the Initial Study and Mitigated Negative Declaration (IS/MND) for the Tijuana Valley Regional Park Habitat Restoration Plan. We are happy to work with you to address our comments. If you have questions or comments regarding this letter, please contact [Eric Porter](#)<sup>1</sup> or [Anita Eng](#)<sup>2</sup> at 760-431-9440.

Sincerely,

**JONATHAN SNYDER** Digitally signed by  
JONATHAN SNYDER  
Date: 2023.12.21  
12:29:13 -08'00'  
 Jonathan D. Snyder  
 Assistant Field Supervisor

cc: [MeganE.doran@sdcounty.ca.gov](mailto:MeganE.doran@sdcounty.ca.gov)  
[brigid.moran@wildlife.ca.gov](mailto:brigid.moran@wildlife.ca.gov)  
[Alison.Kalinowski@wildlife.ca.gov](mailto:Alison.Kalinowski@wildlife.ca.gov)  
[Heather.Schmalbach@wildlife.ca.gov](mailto:Heather.Schmalbach@wildlife.ca.gov)

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<sup>1</sup> [eric\\_porter@fws.gov](mailto:eric_porter@fws.gov)  
<sup>2</sup> [anita\\_eng@fws.gov](mailto:anita_eng@fws.gov)

**LETTER A RESPONSE – COMMENTS A-1 THROUGH A-7**

- A-1** This comment requests an extension of the comment submittal deadline. Although the formal comment period was not extended, the USFWS submitted a comment letter on December 21, 2023. Please see responses A-3 through A-7 to the December 21, 2023 comment letter.
- A-2** This comment acknowledges the County's decision not to extend the formal comment period and suggests USFWS will still submit comments. Please see responses A-3 through A-7 to the December 21, 2023 comment letter.
- A-3** This comment is introductory in nature, describing the Proposed Project and USFWS's role. No specific response is required.
- A-4** This comment indicates general support for the Proposed Project and USFWS's understanding that the Proposed Project does not include the development of recreational infrastructure or additional trails. The USFWS is correct that the HRP does not include development of recreational facilities. As described in the HRP and the Project Description of the IS/MND, the Proposed Project includes the removal of non-native invasive species and the restoration of habitat. No recreational facilities or trail improvements are described or proposed. Because the Mitigation Monitoring and Reporting Program (MMRP) only addresses the Proposed Project activities analyzed in the IS/MND, the installation of recreational infrastructure would not be covered by the proposed MMRP. The IS/MND (see page IS-8 of Attachment A to the MND) has been updated to provide clarity regarding the description of the activities associated with the Proposed Project.
- A-5** The comment requests preparation of a Habitat Management Plan encompassing all restored areas. Following completion of restoration, all restored areas would be managed and conserved in perpetuity by the County and managed following the existing Tijuana River Valley Regional Park Area Specific Management Directives (County 2007). No change to the HRP or IS/MND is required as a result of this comment.
- A-6** The comment requests coordination with the U.S. Army Corps of Engineers (USACE) and USFWS to ensure potential effects of LBV are appropriately addressed in accordance with the Endangered Species Act. The County is preparing the application for a USACE 404 permit and is coordinating with USACE. The County has also initiated coordination with the USFWS related to the Proposed Project. The Proposed Project includes mitigation measures to conform with the Migratory Bird Treaty Act and Multiple Species Conservation Program (MSCP). The commentor is correct that the MSCP does not provide take authorization for potential impacts to LBV. Impacts to breeding least Bell's vireo, occupied habitat, and temporary (foraging, migration, and dispersal) habitat would be significant. However, impacts to occupied habitat would be small in relation to the total occupied habitat within the TRVRP, and through implementation of mitigation measures **BIO-1** and **BIO-2**, impacts to this species would be reduced to less than significant. Additionally, the County intends to submit permit applications and consult with appropriate regulatory agencies for concurrence on potential impacts to LBV.
- A-7** This is a concluding comment that is general in nature and no specific response is required.

**LETTER B – CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE (CDFW)**

**LETTER B**

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**From:** Moran, Brigid@Wildlife <Brigid.Moran@Wildlife.ca.gov>  
**Sent:** Monday, December 11, 2023 11:55 AM  
**To:** Doran, Megan E  
**Cc:** Turner, Jennifer@Wildlife  
**Subject:** [External] Tijuana River Valley Regional Park Habitat Restoration Plan

Hi Megan,

B-1 CDFW has completed review of the MND for the Tijuana River Valley Regional Park Habitat Restoration Plan. We appreciate your commitment to restoration in the Tijuana River Valley and believe your HRP looks like a good plan.

I would like to request that the HRP include a more concrete measure to ensure avoidance of small wildlife species, such as western spadefoot and Belding’s orange-throated whiptail. We want to ensure no sensitive species are trapped or crushed in the process of restoration activities. Here is an example of what we have recommended in the past:

B-2 A wildlife pre-construction survey shall be conducted on the day that construction activities, including vegetation removal, occur within the Project site where suitable habitat is present. Construction personnel shall conduct daily inspections of trenches and holes for entrapped wildlife each morning prior to the onset of Project construction, and inspections of pipes, culverts, and similar construction material for entrapped wildlife at the beginning and end of the day. If sensitive wildlife species are observed during the pre-construction survey, a qualified biologist shall require additional measures to reduce potential impacts, such as establishing an appropriate buffer. Speed limits shall also be established for vehicles on site to lessen the chance of crushing wildlife.

Thank you for your coordination. Please let me know if you have any questions.

-----  
**Brigid Moran**  
Environmental Scientist  
California Department of Fish and Wildlife  
3883 Ruffin Road  
San Diego, California 92123  
cell: (858) 354-3527

**LETTER B RESPONSE – COMMENTS B-1 THROUGH B-2**

- B-1** The comment is introductory in nature and provides general support for the Proposed Project. No response is required.
- B-2** This comment suggests more concrete mitigation language to address western spadefoot and Belding's orange-throated whiptail. The existing mitigation measure **BIO-9**, which requires certain pre-construction activities and construction monitoring be performed by a biologist, is intended to prevent impacts to special status species, western spadefoot and Belding's orange-throated whiptail. However, additional clarifying language has been added to BIO-9 (see page IS-58 of Attachment A to the MND). Regarding speed limits, consistent with the language of the HRP, restoration areas would be accessed from existing roadways with established speed limits or existing access roads/pathways that occur as part of the formal trail network in the park. There would not be creation of access roads within the restoration areas. Clarification of construction BMPs, including speed limits, has been added into the IS/MND (see page IS-43 of Attachment A to the MND).

**LETTER C - CALIFORNIA STATE PARKS, TIJUANA RIVER NATIONAL ESTUARINE RESEARCH RESERVE (TRNERR)**

**LETTER C**

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**From:** Peregrin, Chris@Parks <Chris.Peregrin@parks.ca.gov>  
**Sent:** Monday, December 18, 2023 6:19 PM  
**To:** CEQA, CountyParks  
**Cc:** Seibel, Kiran; Doran, Megan E; Warner-Lara, Lorena@Parks; jcrooks@trnerr.org; Ahmad, Marya@Parks  
**Subject:** [External] Tijuana River Valley Regional Park Habitat Restoration Plan Draft MND

Hi Kiran and Megan,

C-1

Thank you for the opportunity to comment on the Tijuana River Valley Regional Park Habitat Restoration Plan Draft Mitigated Negative Declaration. We appreciate the opportunity to review and look forward to continuing to work with you on this important plan and the projects that will follow. Moving forward, we request that the County continue to consult with CA State Parks and the Tijuana River National Estuarine Research Reserve as the plan is finalized, and as specific restoration projects become prioritized. We are particularly interested in working with you to ensure that the Nelson Sloan Quarry Restoration and Beneficial Reuse of Sediment Project is effectively integrated with the Tijuana River Valley Regional Park Habitat Restoration Plan. We are also very interested in all restoration efforts in the transition areas between the Tijuana River National Estuarine Research Reserve and Tijuana River Valley Regional Park, and to ensure that projects following the Tijuana River Valley Regional Park Habitat Restoration Plan account for effective saltmarsh migration, as anticipated with future sea level rise.

Thank you for all of the hard work you and the team at County Parks have put in on this planning effort.

Sincerely,

Chris

Christopher M. Peregrin  
 Manager: Tijuana River National Estuarine Research Reserve,  
 Border Field State Park, Silver Strand State Beach.  
 Mobile Phone: 619-204-0097

**LETTER C RESPONSE – COMMENT C-1**

**C-1** This comment indicates a desire to coordinate with the County as future specific restoration projects are finalized, with a specific focus on the Nelson Sloan Quarry and Beneficial Reuse of Sediment Project and to ensure future projects account for sea level rise and saltmarsh migration. The County will integrate additional coordination activities into the Execution Plans for Phases 7, 8, 10, and 11 and when restoration efforts are planned to occur in the transition areas between the Tijuana River National Estuarine Research Reserve (TRNERR) and the TRVRP. Specifically, the County will coordinate with the TRNERR group at the time funding is acquired.

With regard to the Nelson Sloan site, this project is a joint project between State Parks and the County continues to actively coordinate with State Parks.

With regard to sea level rise and saltmarsh migration, the Proposed Project intends to remove trash and invasive non-native plant root masses that lead to pockets of standing water along the Tijuana River. By removing the trash and root masses, the water flowing along the Tijuana River to the Pacific Ocean will not be trapped in standing ponds and those areas will be able to drain to the Pacific Ocean and sufficiently dry out following rain events and re-vegetate. By promoting larger flows of water along the river to the ocean, and if more areas along the river are not constantly submerged, it will help slow the rising water levels along the river and create conditions that allow salt marshes to either persist or re-establish without needing to migrate into historically upland areas.

No change to the HRP or IS/MND is required as a result of this comment.

**LETTER D – CITY OF SAN DIEGO STORMWATER DEPARTMENT**

**LETTER D**

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**From:** White, Alexis <WhiteA@sandiego.gov>  
**Sent:** Monday, December 18, 2023 4:05 PM  
**To:** CEQA, CountyParks  
**Cc:** Harry, James; Rothman, Christine  
**Subject:** [External] City of San Diego Stormwater Dept Comments on TRVRP Habitat Restoration Plan MND  
**Attachments:** SWD CEQA Comment Letter\_TJ Restoration Project.pdf

Hello,

D-1 Please see attached the City of San Diego Stormwater Department comment letter on the Draft Mitigated Negative Declaration (MND) for the Tijuana River Valley Regional Park Habitat Restoration Plan (Proposed Project).

Thanks!

**Alexis White**  
Associate Planner  
Stormwater Department  
City of San Diego

---

Main Line: (858) 541-4349 | Cell: (619) 323-4620  
[WhiteA@sandiego.gov](mailto:WhiteA@sandiego.gov)  
[www.thinkblue.org](http://www.thinkblue.org)



**CONFIDENTIAL COMMUNICATION**

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City of San Diego Stormwater Department

9370 Chesapeake Drive, Suite 100 San Diego, CA 92123  
swppp@sandiego.gov | 619-235-1000

December 18th, 2023

VIA EMAIL:

Megan Doran  
Department of Parks and Recreation  
County of San Diego  
5500 Overland Avenue, Suite 410  
San Diego, California 92123

Subject: City of San Diego TRVRP Habitat Restoration Plan CEQA Review Comments

Dear Megan:

D-2

The City of San Diego Stormwater Department (SWD) has several permitted compensatory mitigation projects (see attached figure). Most of these mitigation projects are within City property, while some are within County property:

- Currently being implemented:
  - 6-acre Smythe-Bandola Mitigation Site
- In long-term maintenance
  - 11.02-acre TJ Creation Mitigation Site
  - 4.31-acre TJ Out-of-Channel Enhancement
  - 4.31-acre TJ In-Channel Enhancement

Should this project need to impact a mitigation site, the resource agencies may penalize the County's project by requiring replacement mitigation at a higher ratio. SWD would like to request progress updates on the TJV Habitat Restoration Plan, especially as it relates to Phases 6 & 7 that currently are proposed to overlap with our mitigation sites. The current SWD staff contact related to the mitigation sites is Christine Rothman [crothman@sandiego.gov](mailto:crothman@sandiego.gov). In addition, SWD is interested in future opportunities to purchase mitigation credits should credits become available in the execution of the TJV Habitat Restoration Plan.

Sincerely,

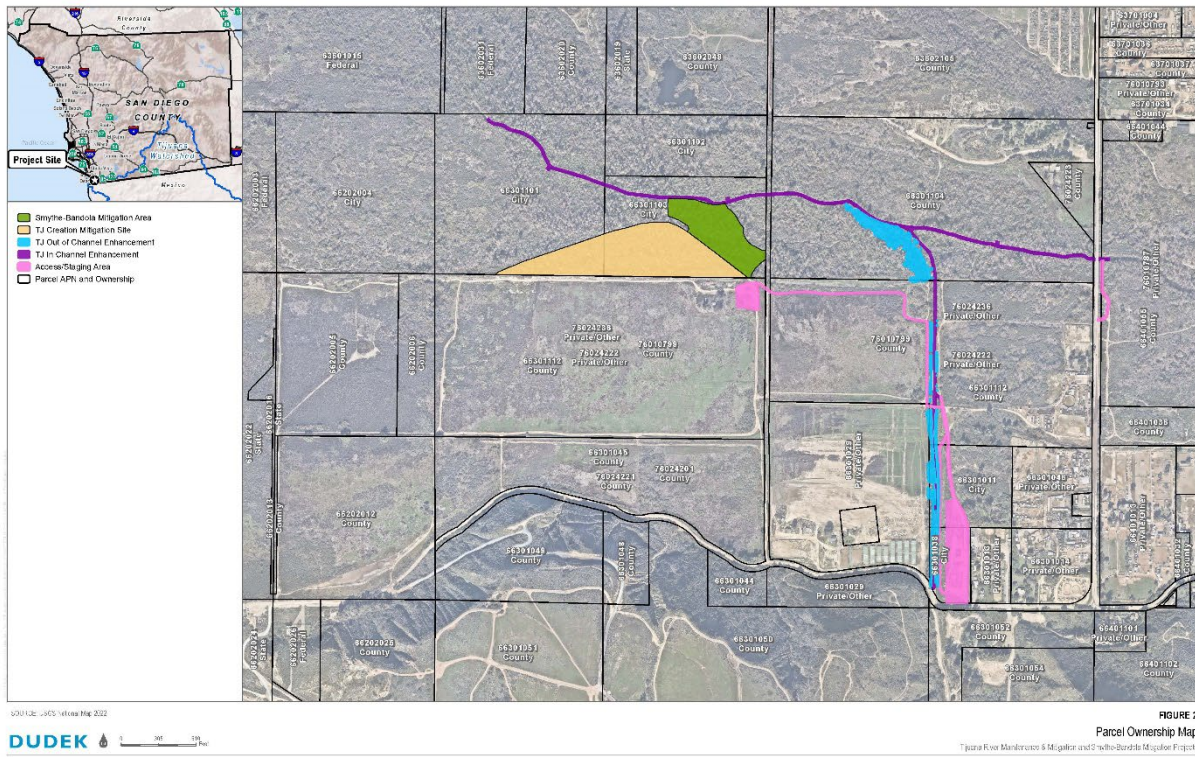
Alexis White  
Associate Planner

AW\jh

Attachment: City of San Diego Mitigation Projects Map



[www.thinkblue.org](http://www.thinkblue.org)



**LETTER D RESPONSE – COMMENTS D-1 THROUGH D-2**

- D-1** This comment is introductory in nature and states that further comments are provided in an attached letter. No specific response is required.
- D-2** The comment wishes to advise of several compensatory mitigation sites within the Proposed Project area. Coordination with Stormwater Department Staff can be incorporated into the relevant Execution Plans for Phases 6 and 7 as they are created and when activities are proposed on City of San Diego property. Regarding future mitigation credits, the Proposed Project is not being developed as a mitigation bank; however, the County is open to coordination for other entities to complete mitigation on DPR owned/managed lands. No change to the HRP or IS/MND is required as a result of this comment.

**LETTER E – ALMA WEBB**

**LETTER E**

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**From:** Alma Webb <outlook\_D4E483E75E3044D9@outlook.com>  
**Sent:** Wednesday, November 29, 2023 12:15 PM  
**To:** CEQA, CountyParks  
**Subject:** [External] TJ Sewage

E-1 [ No holding ponds anywhere near San Ysidro or Imperial Beach. Mexico needs to step up. We need to build dams.  
 Sent from [Mail](#) for Windows

**LETTER E RESPONSE – COMMENT E-1**

- E-1** This comment states general opposition to holding ponds and suggests political and other solutions to holding ponds in the Tijuana River Valley. As this comment does not address activities associated with the Proposed Project or the content or adequacy of the IS/MND, no further response is required. Commenter may also wish to review responses MR-1 and MR-2.

**LETTER F – ANDREA MURPHY**

**LETTER F**

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**From:** Andrea Murphy <peachespuff@icloud.com>  
**Sent:** Wednesday, November 29, 2023 11:23 AM  
**To:** CEQA, CountyParks  
**Subject:** [External] SB 507

F-1 | Dear SD,  
 I am emailing against SB 507.  
 I do not Want Standing Ponds Of Sewage to go Forward. No Thank you.  
 I appreciate your help in this matter.  
 In my opinion, it's a badly planned project.  
 There are a lot of us Watching what is happening. We do not need more stinky sewage ponds.

Thank you,  
Andrea Murphy

Sent from my iPhone

**LETTER F RESPONSE**

**F-1** This comment appears related to the SB 507 Study and not the Proposed Project. Please see Response MR-1. No additional response is required.

**LETTER G – CARY HERSHBERGER**

**LETTER G**

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**From:** Cary <chershberger@cox.net>  
**Sent:** Thursday, November 30, 2023 11:41 AM  
**To:** CEQA, CountyParks  
**Subject:** [External] SB 507

**Importance:** High

**Hello County Parks People,**

**Is it true you are considering approval/implementation of SB 507 ( or any project that results in permanently releasing/staging Mexico's sewage in Imperial Beach)?**

G-1

**Why should the people living in IB have to put up with the adverse health effects / quality of life impacts of Mexico's sewage?**

**IB citizens will hold accountable all public officials that create/approve/implement such harmful and unfair policies!**

Respectfully,  
C Hershberger  
IB property owner / resident



**LETTER G RESPONSE – COMMENT G-1**

- G-1** This comment appears related to the SB 507 Study and not the Proposed Project. Please see Response MR-1. No additional response is required.

**LETTER H – CRISTINA SHEPHERD**

**LETTER H**

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**From:** Cristina <cdshepherd@hotmail.com>  
**Sent:** Wednesday, November 29, 2023 7:41 AM  
**To:** CEQA, CountyParks  
**Subject:** [External] Stop the stink

H-1 | I'm a concerned citizen and I live in the 92154 area very near the Tijuana river valley county park. I can smell rotted sewage and I'm convinced that it's a health hazard. It is very frustrating that County projects in motion are not addressing this mess head on. Please review these projects and if they are not correcting this mess, please take necessary action to do so. Enough is enough.

| Sent from Cristina's iPhone

**LETTER H RESPONSE – COMMENT H-1**

**H-1** This comment states general concerns related to sewage and requests actions be taken to address the smells and health hazards associated with sewage. This comment appears related to the SB 507 Study and not the Proposed Project. As this comment does not address activities associated with the Proposed Project or the content or adequacy of the IS/MND, no further response is required. Commenter may also wish to review responses MR-1 and MR-2.

**LETTER I – DANE CROSBY**

**LETTER I**

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**From:** Dane Crosby <dane4ib@gmail.com>  
**Sent:** Wednesday, December 6, 2023 7:15 PM  
**To:** CEQA, CountyParks  
**Subject:** [External] Best Management Practices

Stop the Stink -C4CC Public Rejects the TJRV Habitat Restoration Plan

Taking away historical rights of public use trails from local residents, cub scouts, hikers, horse riders and creating more POLLUTION AND STANDING PONDS OF SEWAGE NEXT TO OUR HOMES is not restoration. It's ENVIRONMENTAL INJUSTICE practiced by the San Diego County Parks.

I-1

This plan lacks historical information and is unacceptable because it permanently incorporates historical Environmental Injustice of the past 40 years practiced by the County of San Diego on the homeowners and ranchers of the South Bay Community.

This plan will take away public access, destroys habitat ignores historical access rights, and incorporates false science/land use policies which destroy the river environment.

Please help us stop this plan and try to engage the people of the South Bay in a real restoration plan that benefits all stakeholders.

Sincerely  
Dane Crosby  
619-595-1757

**LETTER I RESPONSE – COMMENT I-1**

- I-1** Please see Response MR-2. Commenter may also wish to review Response MR-1. No further response is required.

**LETTER J – DWAYNE SNIDER**

**LETTER J**

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**From:** Dwayne Snider <dwaynesnider5@gmail.com>  
**Sent:** Sunday, December 17, 2023 7:32 AM  
**To:** CEQA, CountyParks  
**Subject:** [External] Stop The Stink

J-1 | Please stop planting jumping cactus and invasive Mule Fat species in our public parks. Contact Leon Benham 619-964-9153 who grew up and lives close to the sewage problem. Leon has an extensive research and background for this area specifically .  
| What we are asking for we believe is reasonable, and the least amount of money.\$ I am asking for a response to this letter please. Before the end of 2023

Dwayne Snider

**LETTER J RESPONSE – COMMENT J-1**

**J-1** This comment requests not to plant jumping cactus and Mule Fat species in public parks and to consult with Leon Benham. Jumping cactus/cholla (*Cylindropuntia bigelovii*) is a California native shrub (stem succulent) but is also found elsewhere in western North America. Jumping cactus/cholla does not naturally occur in the TRVRP and the Proposed Project does not propose to introduce or plant this species within the TRVRP. Further, surveys completed between 2018 – 2021 did not document jumping cactus/cholla within the TRVRP. The Proposed Project does include container plantings of coast cholla (*Cylindropuntia prolifera*) and coast prickly pear (*Opuntia littoralis*). Both cactus species are California native shrubs (stem succulent) that naturally occur in the TRVRP. These species occur typically in upland areas including Monument and Spooner’s Mesa.

Mule fat occurs commonly in the TRVRP as a component of riparian shrublands along the Tijuana River. Mule fat (*Baccharis salicifolia*) is a California native shrub but is also found elsewhere in western North America. In the arid west region, it is equally likely to occur in wetlands and non-wetland areas. Because mule fat is a native and naturally occurring shrub in the TRVRP, the areas targeted for riparian woodland, forest, and/or shrubland restoration may include mule fat seed and container plants.

The County has also received input from Mr. Benham and reached out to Mr. Benham on multiple occasions to discuss any remaining comments. To review Mr. Benham’s comments and responses to those comments, please see comments and responses S-1 through S-3.

**LETTER K – ELIZABETH MCMAHON**

**LETTER K**

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**From:** Elizabeth McMahon <elymcmahon@yahoo.com>  
**Sent:** Wednesday, December 13, 2023 2:55 PM  
**To:** Doran, Megan E  
**Subject:** Re: [External] Bridge and restoration project

K-1 I don't really understand your answer. Will any trails be closed because of the restoration project? Will any trails be permanently closed?

[Sent from Yahoo Mail for iPad](#)

On Wednesday, December 13, 2023, 11:36 AM, Doran, Megan E <MeganE.Doran@sdcounty.ca.gov> wrote:

Hi Elizabeth – Regarding the Project currently out for public review (Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the Tijuana River Valley Regional Park Habitat Restoration Project), the Project includes public notification/posting in case any areas have closure dates or dates the Project area should be avoided. To clarify, the Project is solely for removal of invasive non-native plants and restoration with native plants to restore. In short, the Project out for public review is for habitat restoration only. The environmental document out for public review can be found by following the link below.

Link to environmental document: [sdparks.org/content/dam/sdparks/en/pdf/Resource-Management/TRVRP\\_HRP\\_DRAFT\\_IS\\_MND.pdf](https://sdparks.org/content/dam/sdparks/en/pdf/Resource-Management/TRVRP_HRP_DRAFT_IS_MND.pdf)

If you would like to submit a comment, please submit all comments no later than **12/18/23 at 5:00 p.m.** Comments should be emailed to [CountyParksCEQA@sdcounty.ca.gov](mailto:CountyParksCEQA@sdcounty.ca.gov).

Thank you,

Megan

County of San Diego, Parks and Recreation

(619) 909-6309

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**From:** Elizabeth McMahon <elymcmahon@yahoo.com>  
**Sent:** Wednesday, December 13, 2023 6:30 AM



**To:** Doran, Megan E <MeganE.Doran@sdcounty.ca.gov>  
**Subject:** [External] Bridge and restoration project

Hello

K-2

Are there going to be trails closed for the restoration project in the Tijuana river valley? If so, Will they be temporary or permanently closed? Which trails ?

And , for the record,I oppose this project.

Also where is the bridge that is going across the Tijuana river?

Thank you

Elizabeth

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**From:** Elizabeth McMahon <elymcmahon@yahoo.com>  
**Sent:** Wednesday, December 13, 2023 3:02 PM  
**To:** CEQA, CountyParks  
**Subject:** [External] Habitat restoration project

K-3 I highly oppose the Tijuana River Valley Habitat restoration project.  
 Elizabeth McMahon  
 Imperial Beach resident  
[Sent from Yahoo Mail for iPad](#)

**LETTER K RESPONSE – COMMENTS K-1 THROUGH K-2**

- K-1** The comment inquires if any trails will be closed as a result of the Proposed Project. Although habitat restoration activities associated with the Proposed Project would occur within and adjacent to trails throughout the TRVRP, the Proposed Project would not permanently impact access to the formal trail network. The Proposed Project also includes requirements for public notification/postings in the event any areas will have temporary closures or if areas should be avoided during the restoration activities. These closures would be temporary in nature and occur within separate phases while the work is completed.
- K-2** The comment asks whether trails will be closed, states general opposition to the Proposed Project and inquires about a bridge across the Tijuana River. The general opposition to the Proposed Project is noted; however, the comment does not address the adequacy of the IS/MND and, therefore, no specific response is required. Response K-1 above addresses trail closures. The question regarding the bridge is not relevant as the Proposed Project does not propose a bridge across the Tijuana River.
- K-3** Comment noted. This comment does not address the content or adequacy of the Proposed Project or IS/MND and no response is required.

**LETTER L – ERIC LANGDON**

**LETTER L**

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**From:** Eric L. <cadiman2@gmail.com>  
**Sent:** Sunday, December 10, 2023 10:26 AM  
**To:** CEQA, CountyParks  
**Subject:** [External] Expansion of Natural Beauty, Imperial Beach

L-1 [ Dear County Members,  
We need our River Mouth restored to it's Natural Beauty, not a holding pond for Mexico Sewage. We need this now!!!! It's gone on too long. While you throw money at higher tax bracket areas we are suffering Oceanwise and Healthwise. Yes it's time to step up!!!! Eric Langdon

**LETTER L RESPONSE – COMMENT L-1**

- L-1** This comment states general concerns related to sewage and requests action be taken to address the sewage problems. This comment appears related to the SB 507 Study and not the Proposed Project. As this comment does not address activities associated with the Proposed Project or the content or adequacy of the IS/MND, no further response is required. Commenter may also wish to review responses MR-1 and MR-2.

**LETTER M – ERIKA BIRD**

**LETTER M**

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**From:** Erika bird <erikajillbird@gmail.com>  
**Sent:** Saturday, December 9, 2023 4:33 PM  
**To:** CEQA, CountyParks  
**Subject:** [External] Stop the Stink -Public Rejects the TJRV Habitat Restoration Plan

M-1 | Please San Diego County, we want our Tijuana River Cleaned up expanded and beautiful just like the \$ 60 million they are spending in Del Mar. We don't want our hiking trails removed we want the public access restored/expanded just like the County has done in Bonita, Mission Valley, Poway Del Mar and every other community in San Diego.

The plan lacks historical information and is unacceptable because it permanently incorporates historical Environmental Injustice of the past 40 years practiced by the County of San Diego on the homeowners and ranchers of the South Bay Community.

Erika Bird  
Director, Allsaid & Dunn, LLC  
Web: [www.thereadinggame.com](http://www.thereadinggame.com)  
FB: [www.facebook.com/thereadinggame](https://www.facebook.com/thereadinggame)  
Twitter: @thereadinggame2  
YouTube: [www.youtube.com/thereadinggame](https://www.youtube.com/thereadinggame)  
Instagram: @thereadinggame  
Telephone: 858-412-3442  
Email: [info@thereadinggame.com](mailto:info@thereadinggame.com)

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**From:** Erika bird <erikajillbird@gmail.com>  
**Sent:** Monday, December 11, 2023 9:59 AM  
**To:** CEQA, CountyParks  
**Subject:** Re: [External] Stop the Stink -Public Rejects the TJRV Habitat Restoration Plan

M-2 Thank you. I sure hope something is done about the smell. It makes me very concerned for our health.

Erika Bird  
Director, Allsaid & Dunn, LLC  
Web: [www.thereadinggame.com](http://www.thereadinggame.com)  
FB: [www.facebook.com/thereadinggame](https://www.facebook.com/thereadinggame)  
Twitter: @thereadinggame2  
YouTube: [www.youtube.com/thereadinggame](https://www.youtube.com/thereadinggame)  
Instagram: @thereadinggame  
Telephone: 858-412-3442  
Email: [info@thereadinggame.com](mailto:info@thereadinggame.com)

On Dec 11, 2023, at 9:47 AM, CEQA, CountyParks <CountyParksCEQA@sdcounty.ca.gov> wrote:

Hi Erika – we appreciate your feedback. Your comment will be reviewed and a response will be provided in the final environmental document.

Thank you,  
Megan

Megan Doran  
Land Use/Environmental Planner, Resource Management Division  
County of San Diego Parks & Recreation  
5500 Overland Avenue, Suite 410  
San Diego, CA 92123  
Cell: (619) 909-6309  
[www.sdparks.org](http://www.sdparks.org)

<image001.jpg>

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**From:** Erika bird <erikajillbird@gmail.com>  
**Sent:** Saturday, December 9, 2023 4:33 PM  
**To:** CEQA, CountyParks <CountyParksCEQA@sdcounty.ca.gov>  
**Subject:** [External] Stop the Stink -Public Rejects the TJRV Habitat Restoration Plan

Please San Diego County, we want our Tijuana River Cleaned up expanded and beautiful just like the \$ 60 million they are spending in Del Mar. We don't want our hiking trails removed we want the public

access restored/expanded just like the County has done in Bonita, Mission Valley, Poway Del Mar and every other community in San Diego.

The plan lacks historical information and is unacceptable because it permanently incorporates historical Environmental Injustice of the past 40 years practiced by the County of San Diego on the homeowners and ranchers of the South Bay Community.

Erika Bird

Director, Allsaid & Dunn, LLC

Web: [www.thereadinggame.com](http://www.thereadinggame.com)

FB: [www.facebook.com/thereadinggame](https://www.facebook.com/thereadinggame)

Twitter: @thereadinggame2

YouTube: [www.youtube.com/thereadinggame](https://www.youtube.com/thereadinggame)

Instagram: @thereadinggame

Telephone: 858-412-3442

Email: [info@thereadinggame.com](mailto:info@thereadinggame.com)



**LETTER M RESPONSE – COMMENTS M-1 THROUGH M-2**

- M-1** This comment requests clean-up of the Tijuana River and expanded public access to recreation and trails as witnessed by commenter in other communities. The comment also indicates the plan lacks historical information and incorporates environmental injustice. Please see response MR-2, which addresses these issues. No additional response is required.
- M-2** This comment is a general comment requesting something be done about the smell of sewage, which is a concern for commenter's health. As this comment does not address activities associated with the Proposed Project or the content or adequacy of the IS/MND, no further response is required. Commenter may also wish to review responses MR-1 and MR-2 referenced above.

**LETTER N – GUILLERMO CORNEJO**

**LETTER N**

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**From:** Guillermo A. Comejo <hocogaco@yahoo.com>  
**Sent:** Monday, December 18, 2023 10:53 AM  
**To:** CEQA, CountyParks  
**Subject:** [External] TJ River Park

N-1 Please, please along the natural river stream bed stop tree-damming sewage waters from TJ. We are tired of the putrid sewage smell carried by ocean breezes into our bedrooms!! If you live here, you will realize that vegetation along the stream is not the way to help ecological restoration of the park. Elsewhere your restoration is ok but not along the stream bed. Wet or seasonal Stream beds around the world are free of trees or otherfree flow vegetation.

**LETTER N RESPONSE – COMMENT N-1**

**N-1** This comment states general concerns related to sewage and suggests that restoration will worsen the sewage problem. No activities are proposed by the HRP that would worsen sewage conditions. In fact, by removing invasives, including trash and root masses, ponding in general in the TRVRP would likely reduce as a result of the Proposed Project. Further, the species to be used for restoration activities were carefully selected native species that typically occur in wet and seasonal stream bed environments. Commenter may also wish to review responses MR-1 and MR-2.

**LETTER O – HERNANDO SUASA**

**LETTER O**

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**From:** HERNANDO SUASA <hsuasa@cox.net>  
**Sent:** Tuesday, November 28, 2023 4:42 PM  
**To:** CEQA, CountyParks  
**Subject:** [External] SB507

O-1 Please...noone who lives in the Nestor area or Tijuana River Valley ever wanted the sewage holding ponds, and yet outsiders put them in. Why cant we who live here be listened to? Why dont we matter? If we were in Beverly Hills or the Hamptons noone one would even suggest such a thing. Now I hear you want to add more with more sewage? We cant leave here, we cant sell our homes as it is. Who would want to buy them? Please...have a meeting with the locales who arent trying to win votes, talk to us who are not for sale. We just want a clean safe place to live. We just want our wild life restored. If you lived here would you be ok with this???? I dont think so...Respectfully, Paula Suasa

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**From:** HERNANDO SUASA <hsuasa@cox.net>  
**Sent:** Sunday, December 17, 2023 6:29 PM  
**To:** CEQA, CountyParks  
**Subject:** [External] Sewage in my neighborhood.

O-2 I am aware that people who dont live in my area want holding ponds where I live. I understand that The County of San Diego is asking for public comment and approval of a list of projects which will permanently keep standing sewage ponds next to our homes and also includes bringing 480% more sewage to our beach. i realize that the ONLY reason those in public office are interested in doing something about the Tijuana sewage is that it is now affecting affluent residents beaches like Coronado and LaJolla. How do I know this...its been going on for decades and all we got were pretty words. I feel, and everyone who lives here feel, that the goal of the politicians and people who dont live here is to keep the sewage in our area, so that those who line politicians pockets will be happy. Our wild life and enviroment will be ruined, but the wealthy will be ok with it. Heres the thing EVENTUALLY it will effect the affluent...but maybe after those who force this nightmare on us will be retired and getting pensions so it wont matter. We cant sale our homes, we are trapped here. I want to stay, but its dangerous. Is there anyone in public office who cares? PLEASE...NO MORE HOLDING PONDS, NO MORE SEWAGE. Thankyou, Paula Suasa

**LETTER O RESPONSE – COMMENTS O-1 THROUGH O-2**

- O-1** This comment states general concerns related to sewage, suggesting the project would increase sewage ponds. This comment appears related to the infrastructure projects included in the SB 507 Study and not the Proposed Project. For a response regarding the SB 507 Study, please refer to Response MR-1. As this comment does not address activities associated with the Proposed Project or the content or adequacy of the IS/MND, no further response is required. Commenter may also wish to review Response MR-2.
- O-2** Please see Response O-1 above.

**LETTER P – JUDY COLLINS**

**LETTER P**

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**From:** Judy and John Collins <jnjcollins@yahoo.com>  
**Sent:** Thursday, December 7, 2023 11:23 AM  
**To:** CEQA, CountyParks  
**Subject:** [External] Fix the Harmful Environment of the Park

P-1 Please send me the Environmental Impact Report for this project. If there was one. Who wants to hike on a new trail in such a neglected and damaged environment before it is restored?

P-2 I visited the trails on the hills high above the valley recently for the first time in decades. Wonderful views of San Diego. But to get there we crossed smelly parts of the river and the valley was overrun with invasive plants that blocked the view from the road.

1) Please speak up to restore the river course. That will stop the pooling that kills trees and that traps smelly water away from one main river course to the sea.

P-3 2) Rid the valley of the invasive plants that have blocked access and views of the valley lands.

3) Please. Protect the County Park. The priority is to Speak up to channel the river, bulldoze and dispose of the invasive species before adding new trails that reinforce the unnatural Valley landscape of 2023.

Judy Collins, Coronado

[Sent from Yahoo Mail on Android](#)

**LETTER P RESPONSE – COMMENTS P-1 THROUGH P-3**

- P-1** A link to the draft IS/MND was sent to the commenter on December 8, 2023 as requested.
- P-2** This comment states the commenter's recent experience in the TRVRP, noting smells of sewage and invasive plants. This comment is general in nature and does not address the content or adequacy of the IS/MND and no further response is required.
- P-3** The comment requests improvements to the TRVRP, including removal of invasives, which is the primary purpose and intent of the Proposed Project. Please refer to Response MR-2, which describes the components of the Proposed Project, including the benefits of the proposed removal of invasives and restoration of native habitats. As this comment does not address the content or adequacy of the IS/MND, no further response is required.



**LETTER Q – KATHY CHAMBERS**

**LETTER Q**

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**From:** Kathy Chambers <chamberskatherine3@gmail.com>  
**Sent:** Tuesday, November 28, 2023 7:08 AM  
**To:** CEQA, CountyParks  
**Subject:** [External] SB504

Q-1 I live in Imperial Beach and I do not want standing ponds of sewage. I reject this project, please do not move forward on this.  
Katherine Chambers  
354 Evergreen Avenue  
Imperial Beach, CA 91932

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**From:** Kathy Chambers <chamberskatherine3@gmail.com>  
**Sent:** Tuesday, November 28, 2023 8:14 AM  
**To:** CEQA, CountyParks  
**Subject:** [External] SB507

Q-2 [ Please do not approve this project. We do not want standing sewage ponds near our homes. We are already suffering illnesses from all the sewage here in Imperial Beach, and this will just create more of a problem. This is a badly planned project and will result in more of a disaster. We want a clean county park environment.  
 Thank you.  
 Katherine Chambers  
 354 Evergreen Avenue  
 Imperial Beach, CA 91932

**LETTER Q RESPONSE – COMMENTS Q-1 THROUGH Q-2**

- Q-1** This comment states general opposition and concerns related to sewage. This comment appears related to the infrastructure projects included in the SB 507 Study and not the Proposed Project. For a response regarding the SB 507 Study, please refer to Response MR-1. As this comment does not address activities associated with the Proposed Project or the content or adequacy of the IS/MND, no further response is required.
- Q-2** Please refer to Response Q-1 above.

**LETTER R – LENORA PORCELLA**

**LETTER R**

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**From:** Lenora Porcella <lenoraporcella@gmail.com>  
**Sent:** Monday, December 18, 2023 2:11 AM  
**To:** CEQA, CountyParks  
**Subject:** [External] Reject the TJRV Habitat Restoration Plan

To Whom it May Concern:

For decades the county park in the Tijuana River Valley has been ignored and neglected. Often, besides the trash, debris, broken concrete blocks, and the buildup of sewage, the smell prevents anyone from enjoying a day in our parklands.

It saddens me... as a girl, in the 1960's I rode my horse on the trails. I saw wildlife and birds. It wasn't perfect then but the park has been in dire need of restoration and support for a very long time.

The public has not had enough time or opportunity to weigh in on the current planning. We don't want a smaller park. We don't want holding ponds of sewage. We don't want more sewage than we have now. What we want is a park that has no sewage. We want the Mexican sewage to stay in Mexico. We want the trash and debris cleaned up and we want a plan to prevent further deterioration of our park land.

R-1

We want a park that helps to preserve and protect the environment and wildlife; this plan doesn't do enough... the sewage and the smell have created a situation that must be addressed.

I request that you do not go forward and reject this plan. I object to changes brought by SB 507, I don't want to continue to smell the sewage, and I am asking the county to do two things:

Bring this back to the neighborhoods that are impacted. I'm not aware of noticing or meetings for those most impacted tp be informed and to have a voice.

Next, do nothing until we can all agree on a plan that does not bring more sewage into this country that will impact San Ysidro and Imperial Beach. We need a plan with real restoration for what could be, and what should be a county gem.

Reject the TJRV Habitat Restoration Plan. PLEASE. Please help preserve this south bay treasure and make a plan without sewage ponds.

Sincerely,

Lenora Porcella

967 3rd St  
Imperial Beach, CA

**LETTER R RESPONSE – COMMENT R-1**

- R-1** This comment states the commenter's experience in the TRVRP, with concerns related to trash, debris, and sewage. This comment also references the SB 507 Study. For a response regarding the SB 507 Study, including coordination with the community, please refer to Response MR-1. Please also refer to Response MR-2, which describes the components of the Proposed Project, including the benefits of the proposed removal of invasives and restoration of native habitats. As this comment does not address activities associated with the Proposed Project or the content or adequacy of the IS/MND, no further response is required.

**LETTER S – LEON BENHAM**

**LETTER S**

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**From:** Leon Benham <leonbenham59@gmail.com>  
**Sent:** Wednesday, December 6, 2023 10:47 AM  
**To:** CEQA, CountyParks  
**Subject:** [External] Stop the Stink-Public Comment- Reject the TJR/V Habitat Restoration Plan

Attn: Mega Doran

Email: CountyParksCEQA@sdcounty.ca.gov

Subject: Stop the Stink -C4CC Public Rejects the TJR/V Habitat Restoration Plan

This plan lacks historical information and is unacceptable because it permanently incorporates historical Environmental Injustice of the past 40 years practiced by the County of San Diego on the homeowners and ranchers of the South Bay Community.

S-1 This plan will take away public access, destroys habit, ignores historical access rights, and incorporates false science/land use policies which destroy the river environment.

Taking away historical rights of public use trails from local residents, cub scouts, hikers, horse riders and creating more POLLUTION AND STANDING PONDS OF SEWAGE NEXT TO OUR HOMES is not restoration. It's ENVIRONMENTAL INJUSTICE practiced by the San Diego County Parks.

Please help us stop this plan and try to engage the people of the South Bay in a real restoration plan that benefits all stakeholders.

Leon Benham, President  
Citizens for Coastal Conservancy  
619-964-9153  
lbfarmerleon@gmail.com

---

**From:** Leon Benham <leonbenham59@gmail.com>  
**Sent:** Thursday, December 7, 2023 3:33 PM  
**To:** CEQA, CountyParks  
**Subject:** [External] Re: Stop the Stink-Public Comment- Reject the TJRV Habitat Restoration Plan

Kiran

S-2 | Respectfully i ask you and your Parks staff to consider, instead of just filing our comments, to give feedback to your staff at Parks & Recreation to meet with local residents and come to an accurate understanding of what our complaints are regarding the badly conceived TRV restoration plan and SB507.

As I do not know you personally, your history or your experience in habitat restoration, I ask you to provide a response to the specific shortcomings of the TRV Restoration Plan by the people who use this public park and have to endure the constant stink of sewage.

Leon Benham  
Citizens for Coastal Conservancy  
Phone 619-964-9153

This person or group

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**From:** CEQA, CountyParks <CountyParksCEQA@sdcounty.ca.gov>  
**Sent:** Thursday, December 7, 2023 7:33 AM  
**To:** Leon Benham <leonbenham59@gmail.com>; CEQA, CountyParks <CountyParksCEQA@sdcounty.ca.gov>  
**Subject:** RE: Stop the Stink-Public Comment- Reject the TJRV Habitat Restoration Plan

Hi Leon – we appreciate your feedback. Your comment will be reviewed and a response will be provided in the Final environmental document.

Thank you,  
Kiran

**Kiran Seibel** (she-her-hers)  
County of San Diego, Parks and Recreation  
(619) 209-9922

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**From:** Leon Benham <leonbenham59@gmail.com>  
**Sent:** Wednesday, December 6, 2023 10:47 AM  
**To:** CEQA, CountyParks <CountyParksCEQA@sdcounty.ca.gov>  
**Subject:** [External] Stop the Stink-Public Comment- Reject the TJRV Habitat Restoration Plan

Attn: Mega Doran

Email: [CountyParksCEQA@sdcounty.ca.gov](mailto:CountyParksCEQA@sdcounty.ca.gov)

Subject: Stop the Stink -C4CC Public Rejects the TJRV Habitat Restoration Plan

This plan lacks historical information and is unacceptable because it permanently incorporates historical Environmental Injustice of the past 40 years practiced by the County of San Diego on the homeowners and ranchers of the South Bay Community.

This plan will take away public access, destroys habit, ignores historical access rights, and incorporates false science/land use policies which destroy the river environment.

Taking away historical rights of public use trails from local residents, cub scouts, hikers, horse riders and creating more POLLUTION AND STANDING PONDS OF SEWAGE NEXT TO OUR HOMES is not restoration. It's ENVIRONMENTAL INJUSTICE practiced by the San Diego County Parks.

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Leon Benham, President  
Citizens for Coastal Conservancy  
619-964-9153  
[lbfarmerleon@gmail.com](mailto:lbfarmerleon@gmail.com)



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**From:** Leon Benham <leonbenham59@gmail.com>  
**Sent:** Monday, December 11, 2023 5:41 PM  
**To:** CEQA, CountyParks  
**Subject:** [External] Re: Stop the Stink-Public Comment- Reject the TJRV Habitat Restoration Plan  
**Attachments:** original-A60DB28A-31BE-42C6-8057-C3A301B0CFB7.jpeg

Megan

S-3

Of course but because of the Environmental Injustice of the TRV Restoration plan I don't know what meeting after the fact will do.

All i want is that you extend the date and meet with local residents.

Leon Benham

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**From:** Doran, Megan E <MeganE.Doran@sdcounty.ca.gov> on behalf of CEQA, CountyParks <CountyParksCEQA@sdcounty.ca.gov>  
**Sent:** Monday, December 11, 2023 9:05 AM  
**To:** Leon Benham <leonbenham59@gmail.com>  
**Cc:** CEQA, CountyParks <CountyParksCEQA@sdcounty.ca.gov>  
**Subject:** RE: Stop the Stink-Public Comment- Reject the TJRV Habitat Restoration Plan

Hi Leon – Thank you for your response. We can arrange for a meeting with you once the public review period has closed and we have had a chance to review all comments received. We will reach back out with some potential dates/times once the public review period has ended and we have reviewed all comments.

Thank you,

Megan Doran  
Land Use/Environmental Planner, Resource Management Division  
County of San Diego Parks & Recreation  
5500 Overland Avenue, Suite 410  
San Diego, CA 92123  
Cell: (619) 909-6309  
[www.sdparks.org](http://www.sdparks.org)




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**From:** Leon Benham <leonbenham59@gmail.com>  
**Sent:** Thursday, December 7, 2023 3:33 PM  
**To:** CEQA, CountyParks <CountyParksCEQA@sdcounty.ca.gov>  
**Subject:** [External] Re: Stop the Stink-Public Comment- Reject the TJRV Habitat Restoration Plan

Kiran

Respectfully i ask you and your Parks staff to consider, instead of just filing our comments, to give feedback to your staff at Parks & Recreation to meet with local residents and come to an accurate understanding of what our complaints are regarding the badly conceived TRV restoration plan and SB507.

As I do not know you personally, your history or your experience in habitat restoration, I ask you to provide a response to the specific shortcomings of the TRV Restoration Plan by the people who use this public park and have to endure the constant stink of sewage.

Leon Benham  
Citizens for Coastal Conservancy  
Phone 619-964-9153

This person or group

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**From:** CEQA, CountyParks <[CountyParksCEQA@sdcounty.ca.gov](mailto:CountyParksCEQA@sdcounty.ca.gov)>  
**Sent:** Thursday, December 7, 2023 7:33 AM  
**To:** Leon Benham <[leonbenham59@gmail.com](mailto:leonbenham59@gmail.com)>; CEQA, CountyParks <[CountyParksCEQA@sdcounty.ca.gov](mailto:CountyParksCEQA@sdcounty.ca.gov)>  
**Subject:** RE: Stop the Stink-Public Comment- Reject the TJRV Habitat Restoration Plan

Hi Leon – we appreciate your feedback. Your comment will be reviewed and a response will be provided in the Final environmental document.

Thank you,  
Kiran

**Kiran Seibel** (she-her-hers)  
County of San Diego, Parks and Recreation  
(619) 209-9922

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**From:** Leon Benham <[leonbenham59@gmail.com](mailto:leonbenham59@gmail.com)>  
**Sent:** Wednesday, December 6, 2023 10:47 AM  
**To:** CEQA, CountyParks <[CountyParksCEQA@sdcounty.ca.gov](mailto:CountyParksCEQA@sdcounty.ca.gov)>  
**Subject:** [External] Stop the Stink-Public Comment- Reject the TJRV Habitat Restoration Plan

Attn: Mega Doran

Email: [CountyParksCEQA@sdcounty.ca.gov](mailto:CountyParksCEQA@sdcounty.ca.gov)

Subject: Stop the Stink -C4CC Public Rejects the TJRV Habitat Restoration Plan

This plan lacks historical information and is unacceptable because it permanently incorporates historical Environmental Injustice of the past 40 years practiced by the County of San Diego on the homeowners and ranchers of the South Bay Community.

This plan will take away public access, destroys habit, ignores historical access rights, and incorporates false science/land use policies which destroy the river environment.

Taking away historical rights of public use trails from local residents, cub scouts, hikers, horse riders and creating more POLLUTION AND STANDING PONDS OF SEWAGE NEXT TO OUR HOMES is not restoration. It's ENVIRONMENTAL INJUSTICE practiced by the San Diego County Parks.

Please help us stop this plan and try to engage the people of the South Bay in a real restoration plan that benefits all stakeholders.

Leon Benham, President  
Citizens for Coastal Conservancy  
619-964-9153  
[lbfarmerleon@gmail.com](mailto:lbfarmerleon@gmail.com)

**LETTER S RESPONSE – COMMENTS S-1 THROUGH S-2**

- S-1** This comment provides general project opposition, indicating “the plan” 1) lacks historical context, 2) would harm habitat and the river environment, and 3) incorporates environmental injustice by taking away public access opportunities and increasing standing ponds of sewage. Please refer to MR-2, which addresses these comments.
- S-2** For a response regarding the SB 507 Study, including coordination with the community, please refer to Response MR-1.
- S-3** As described in Response MR-1, although the formal public comment period was not extended, County staff has offered to meet with the community as requested.

## LETTER T – MARTHA BAYLON-FUTTERMAN

### LETTER T

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**From:** Martha Baylon-Futterman <futterman@hotmail.com>  
**Sent:** Monday, December 11, 2023 2:54 AM  
**To:** CEQA, CountyParks  
**Subject:** [External] Stop the Stink -Public Rejects the TJRV Habitat Restoration Plan

Dear San Diego County parks

T-1 | This plan lacks historical information and is unacceptable because it permanently incorporates historical Environmental Injustice of the past 40 years practiced by the County of San Diego on the homeowners and ranchers of the South Bay Community.



Bat Rays, Fish and the flushing of an outgoing tide.  
nextdoor.com

Martha Baylon-Futterman  
Imperial Beach Resident

**LETTER T RESPONSE – COMMENT T-1**

**T-1** This comment states general project opposition, noting environmental injustice and a lack of historical context. Please refer to Response MR-2 for a response to this comment.

**Letter U – MICHAEL BANNING**

**LETTER U**

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**From:** Michael T Banning <longjump100@yahoo.com>  
**Sent:** Wednesday, December 6, 2023 9:26 PM  
**To:** CEQA, CountyParks  
**Subject:** [External] TJRV Habitat Restoration Plan

U-1 Dear San Diego County Parks: Please reconsider this plan as it lacks historical information and is unacceptable because it permanently incorporates historical Environmental Injustice of the past 40 years practiced by the County of San Diego on the homeowners and ranchers of the South Bay Community.  
This plan will take away public access, destroys habit, ignores historical access rights, and incorporates false science/land use policies which destroy the river environment. Taking away historical rights of public to use trails, cub scouts, hikers, horse riders, naturalists and creating more pollution and ponding of sewage next to homes. This is not restoration it ignores the environment and promotes pollution.  
Please protect our environment and reject the TJRV Habitat Restoration Plan.

Regards,

Mike Banning  
Imperial Beach

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**From:** Zebra <Zebra1000@proton.me>  
**Sent:** Saturday, December 16, 2023 7:01 PM  
**To:** CEQA, CountyParks  
**Subject:** [External] TJRJV Habitat Restoration Plan planting

U-2 I own a property in Imperial Beach and would like to draw your attention to the ongoing plans to resolve the sewage issues.

U-3 Regarding the TJRV Habitat Restoration Plan why are jumping cactus and invasive Mule Fat species being planted in our public park? These plants are harmful to the specific environment plant life and limit the public use of the park. Why are non-native plants being planted in this public park area?

Please reconsider your position regarding replanting of this public park area.

U-4 Also, would you please reconsider the current plan to resolve the sewage problem in Imperial Beach by not creating more pollution and standing ponds of sewage near homes.

U-5 Why not consider alternate plans for cleaning up this area by listening to the residents of Imperial Beach rather than ignoring them? What if you were to incorporate some of the plans as promoted by groups such as the Citizens for Coastal Conservancy - Would the sky really fall?

Regards,

Mike Banning

Sent with [Proton Mail](#) secure email.



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**From:** Zebra <Zebra1000@proton.me>  
**Sent:** Saturday, December 16, 2023 7:05 PM  
**To:** CEQA, CountyParks  
**Subject:** [External] TJR V Habitat Restoration Plan planting

U-6 | Regarding the TJR V Habitat Restoration Plan why are jumping cactus and invasive Mule Fat species being planted in our public park? These plants are harmful to the specific environment plant life and limit the public use of the park. Why are non-native plants being planted in this public park area?

| Please reconsider your position regarding replanting of this public park area.

Regards,

Mike Banning

Sent with [Proton Mail](#) secure email.

**LETTER U RESPONSE – COMMENTS U-1 THROUGH U-6**

- U-1** This comment states general project opposition, noting environmental injustice and a lack of historical context. Please refer to Response MR-2 for a response to this comment.
- U-2** This is a general comment noting on going plans to resolve sewage issues in the TRVRP. This comment is general in nature and does not address the content or adequacy of the IS/MND. No further response is required.
- U-3** This comment questions why the Proposed Project would plant jumping cactus and Mule Fat species in a public park area. Jumping cactus/cholla (*Cylindropuntia bigelovii*) is a California native shrub (stem succulent) but is also found elsewhere in western North America. Jumping cactus/cholla does not naturally occur in the TRVRP and the Proposed Project does not propose to introduce or plant this species within the TRVRP. Further, surveys completed between 2018 – 2021 did not document jumping cactus/cholla within the TRVRP. The Proposed Project does include container plantings of coast cholla (*Cylindropuntia prolifera*) and coast prickly pear (*Opuntia littoralis*). Both cactus species are California native shrubs (stem succulent) that naturally occur in the TRVRP. These species occur typically in upland areas including Monument and Spooner’s Mesa.
- Mule fat occurs commonly in the TRVRP as a component of riparian shrublands along the Tijuana River. Mule fat (*Baccharis salicifolia*) is a California native shrub but is also found elsewhere in western North America. In the arid west region, it is equally likely to occur in wetlands and non-wetland areas. Because mule fat is a native and naturally occurring shrub in the TRVRP, the areas targeted for riparian woodland, forest, and/or shrubland restoration may include mule fat seed and container plants.
- U-4** This comment asks to reconsider sewage treatment plants in the TRVRP. This comment appears related to the infrastructure projects included in the SB 507 Study and not the Proposed Project. For a response regarding the SB 507 Study, please refer to Response MR-1. As this comment does not address activities associated with the Proposed Project or the content or adequacy of the IS/MND, no further response is required.
- U-5** As noted in Response MR-1, the County has offered to meet with the community regarding plans in the TRVRP. As this comment does not address activities associated with the Proposed Project or the content or adequacy of the IS/MND, no further response is required.
- U-6** This comment questions why the Proposed Project would plant jumping cactus and Mule Fat species in a public park area. Please see Response U-3 above.

**LETTER V – MICHAEL BOONE**

**LETTER V**

---

**From:** Mick Boone <mgboone56@gmail.com>  
**Sent:** Wednesday, December 6, 2023 11:07 AM  
**To:** CEQA, CountyParks  
**Cc:** Farmer Leon  
**Subject:** [External] Environmental issues

Subject: Stop the Stink -C4CC Public Rejects the TJR V Habitat Restoration Plan

This plan is unacceptable because it permanently incorporates historical Environmental Injustice of the past 40 years practiced on the homeowners and ranchers of the South Bay Community.

This plan will take away public access, destroys habit, ignores historical access, and incorporates a false science/land use policies which destroy the river environment.

V-1 Taking away historical rights of public use trails from local residents, cub scouts, hikers, horse riders and creating more POLLUTION AND STANDING PONDS OF SEWAGE NEXT TO OUR HOMES is not restoration. It's ENVIRONMENTAL INJUSTICE practiced by the San Diego County Parks.

Please help us stop this plan and engage the San Diego Parks Department in a real restoration plan that benefits all stakeholders.

Michael Boone

**LETTER V RESPONSE – COMMENT V-1**

- V-1** This comment provides general project opposition, indicating “the plan” 1) lacks historical context, 2) would harm habitat and the river environment, and 3) incorporates environmental injustice by taking away public access opportunities and increasing standing ponds of sewage. Please refer to MR 1 and MR-2, which addresses these comments.

**LETTER W – PATRICK DASIS**

**LETTER W**

---

**From:** Patrick Dasis <pdasis71@gmail.com>  
**Sent:** Tuesday, November 28, 2023 6:38 AM  
**To:** CEQA, CountyParks  
**Subject:** [External] STOP THE STINK- OPPOSING SB 507

To whom it will concern

W-1

I am writing to express my vehement disapproval of the proposed list of projects presented by the County of San Diego. The inclusion of plans to maintain standing sewage ponds in close proximity to our homes is not only concerning but poses a significant threat to our community's well-being.

Furthermore, the decision to introduce a staggering 480% increase in sewage to our beach is deeply troubling. This not only jeopardizes the environmental integrity of our coastline but also raises serious questions about the potential health hazards for residents and visitors alike.

I urge you to reconsider these proposals and prioritize the health and safety of our community over short-term conveniences. Public welfare and environmental sustainability should take precedence over projects that compromise the quality of life for those who call this area home.

Sincerely,

Patrick Dasis

--

Regards,

Patrick

**LETTER W RESPONSE – COMMENT W-1**

**W-1** This comment states general opposition and concerns related to sewage. This comment appears related to the infrastructure projects included in the SB 507 Study and not the Proposed Project. For a response regarding the SB 507 Study, please refer to Response MR-1. As this comment does not address activities associated with the Proposed Project or the content or adequacy of the IS/MND, no further response is required.

**LETTER X – RUBY**

**LETTER X**

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**From:** Ruby <bestillral@gmail.com>  
**Sent:** Wednesday, November 29, 2023 6:53 PM  
**To:** CEQA, CountyParks  
**Subject:** [External] We Reject SB 507 TRV Needs and Assessment

X-1 [ Our community in Imperial Beach do not want this list of badly planned projects to go forward.  
We want a clean County Park Environment with expanded public access NOT a polluted one which limits public access and has standing ponds of sewage.

---

**From:** Ruby <bestillral@gmail.com>  
**Sent:** Sunday, December 17, 2023 4:47 PM  
**To:** CEQA, CountyParks  
**Subject:** [External] TRV Needs and Assessment

X-2 I am in agreement with my community neighbors: we want this area to be an open park for everyone and not an off limits preserve for the few environmentalist who do not live here.

We do not want permanently standing sewage ponds next to our homes nor do we want bringing 480% more sewage to our beach. That is not a solution! If you lived in this area, would you be happy with this?

We do not want this list of badly planned projects to go forward.

We want a clean County Park Environment with expanded public access not a polluted one which limits public access and has standing ponds of sewage.

Please take our concerns seriously.



**LETTER X RESPONSE – COMMENTS X-1 THROUGH X-2**

- X-1** This comment appears related to the infrastructure projects included in the SB 507 Study and not the Proposed Project. For a response regarding the SB 507 Study, please refer to Response MR-1. For additional information regarding the Proposed Project, public access, and sewage ponding, please also refer to Response MR-2. As this comment does not address the content or adequacy of the IS/MND, no further response is required.
- X-2** Please refer to Response X-1 above.

**LETTER Y – SUSAN ARCIAGA**

**LETTER Y**

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**From:** Susan Arciaga <suearciaga@icloud.com>  
**Sent:** Tuesday, November 28, 2023 3:19 PM  
**To:** CEQA, CountyParks  
**Subject:** [External] Clean County Park Environment ??

Y-1 [ Stop the projects that will continue to bring sewage into our communities !! We've waited too long and this should not be happening any City in America!! Think of our Navy Seals!! Think of our grandchildren !! Think of our Health !! Please do the right things once and for all !! Seacoast Neighbors Sue and RC Arciaga Sent from my iPhone

**LETTER Y RESPONSE – COMMENT Y-1**

**Y-1** This comment is general in nature and states general opposition and concerns related to sewage. This comment appears related to the infrastructure projects included in the SB 507 Study and not the Proposed Project. For a response regarding the SB 507 Study, please refer to Response MR-1. As this comment does not address activities associated with the Proposed Project or the content or adequacy of the IS/MND, no further response is required.

**LETTER Z – THERESA WILLIAMS**

**LETTER Z**

---

**From:** Theresa Williams <san.diego.theresa@gmail.com>  
**Sent:** Tuesday, November 28, 2023 9:58 PM  
**To:** CEQA, CountyParks  
**Subject:** [External] I REJECT SB507

To The County of San Diego:

Z-1 I have been a resident of Imperial Beach, CA my entire life and have experienced first hand how horrendous it's been dealing with the Tijuana sewage. I am against the list of badly planned projects that will keep standing sewage ponds next to our homes here and bringing 480% more sewage to our beach.

We want a clean County Park Environment with expanded public access, not a polluted one that limits access and has standing ponds of sewage. I personally smell this awful stench everyday and I am sick of it. It's affecting the health of our locals. STOP THE STINK! I reject SB507.

Regards,  
~Theresa

---

**From:** Theresa Williams <san.diego.theresa@gmail.com>  
**Sent:** Saturday, December 2, 2023 2:51 PM  
**To:** CEQA, CountyParks  
**Subject:** Re: [External] | REJECT SB507

Z-2 The confusion Kiran is yours as both documents SB507 and the TJRV restoration plan are on the website link.

The reduction of park trails as shown should not be allowed. This is an open space park not a preserve. The trails and bridges that were part of the plan for our park shown just 5 years ago have not been completed. At the same time millions of dollars is spent on parks in North County with trails and improvements.

This is a clear case of environmental injustice.

~Theresa

On Thu, Nov 30, 2023 at 8:44 AM CEQA, CountyParks <[CountyParksCEQA@sdcounty.ca.gov](mailto:CountyParksCEQA@sdcounty.ca.gov)> wrote:

Hi Theresa – thank you for your email and so sorry for the confusion. To clarify, the document out for public review is the Tijuana River Valley Habitat Restoration Project, not the SB 507 Study. Below is a link to the document in case that’s helpful. The Proposed Project is a habitat restoration project within the Tijuana River Valley focused on removal of non-native plants and replacement with native plants.

Link to Tijuana River Valley Habitat Restoration Project:  
<https://www.sdparks.org/content/dam/sdparks/en/pdf/Resource-Management/TRVRP%20HRP%20DRAFT%20IS%20MND.pdf>

Please let me know if you have any questions or comments on the proposed habitat restoration project.

Thank you,

Kiran

**Kiran Seibel** (she-her-hers)

County of San Diego, Parks and Recreation

(619) 209-9922

---

**From:** Theresa Williams <[san.diego.theresa@gmail.com](mailto:san.diego.theresa@gmail.com)>  
**Sent:** Tuesday, November 28, 2023 9:58 PM  
**To:** CEQA, CountyParks <[CountyParksCEQA@sdcounty.ca.gov](mailto:CountyParksCEQA@sdcounty.ca.gov)>  
**Subject:** [External] | REJECT SB507

To The County of San Diego:

I have been a resident of Imperial Beach, CA my entire life and have experienced first hand how horrendous it's been dealing with the Tijuana sewage. I am against the list of badly planned projects that will keep standing sewage ponds next to our homes here and bringing 480% more sewage to our beach.

We want a clean County Park Environment with expanded public access, not a polluted one that limits access and has standing ponds of sewage. I personally smell this awful stench everyday and I am sick of it. It's affecting the health of our locals. STOP THE STINK! I reject SB507.

Regards,

~Theresa

---

**From:** Theresa Williams <san.diego.theresa@gmail.com>  
**Sent:** Thursday, December 7, 2023 5:19 PM  
**To:** CEQA, CountyParks  
**Subject:** Re: [External] | REJECT SB507

Public Rejects the TJR Valley Habitat Restoration Plan.

Z-3

This TRV plan lacks historical information and is unacceptable because it permanently incorporates historical Environmental Injustice of the past 40 years practiced by the County of San Diego on the homeowners and ranchers of the South Bay Community. This plan will take away public access, destroys habitat, ignores historical access rights, and incorporates false science/land use policies which destroy the river environment. Taking away historical rights of public use trails from local residents, cub scouts, hikers, horse riders and creating more POLLUTION AND STANDING PONDS OF SEWAGE NEXT TO OUR HOMES is not restoration. It's ENVIRONMENTAL INJUSTICE practiced by the San Diego County Parks. Please help us stop this plan and try to engage the people of the South Bay in a real restoration plan that benefits all stakeholders.

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<https://www.sdparks.org/content/dam/sdparks/en/pdf/Resource-Management/TRVRP%20HRP%20DRAFT%20IS%20MND.pdf>

Please let me know if you have any questions or comments on the proposed habitat restoration project.

Thank you,

Kiran

**Kiran Seibel** (she-her-hers)

County of San Diego, Parks and Recreation

(619) 209-9922

---

**From:** Theresa Williams <[san.diego.theresa@gmail.com](mailto:san.diego.theresa@gmail.com)>  
**Sent:** Tuesday, November 28, 2023 9:58 PM  
**To:** CEQA, CountyParks <[CountyParksCEQA@sdcounty.ca.gov](mailto:CountyParksCEQA@sdcounty.ca.gov)>  
**Subject:** [External] | REJECT SB507

To The County of San Diego:

I have been a resident of Imperial Beach, CA my entire life and have experienced first hand how horrendous it's been dealing with the Tijuana sewage. I am against the list of badly planned projects that will keep standing sewage ponds next to our homes here and bringing 480% more sewage to our beach.

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Regards,

~Theresa

--

~Theresa

"Don't take anything personally: Nothing others do is because of you. What others say and do is a projection of their own reality, their own dream." ~Don Miguel Ruiz



**LETTER Z RESPONSE – COMENT Z-1 THROUGH Z-3**

- Z-1** This comment appears related to the infrastructure projects included within the SB 507 Study and not the Proposed Project. For a response regarding the SB 507 Study, please refer to Response MR-1. For additional information regarding the Proposed Project, public access, and sewage ponding, please also refer to Response MR-2. As this comment does not address the content or adequacy of the IS/MND, no further response is required.
- Z-2** The list of projects included in the referenced SB 507 Study is not the subject of the Proposed Project or the related IS/MND. For a description of the Proposed Project and how it relates to the environment, public access, sewage ponding, and environmental justice, please refer to Response MR-2. As this comment does not address the content or adequacy of the IS/MND, no further response is required.
- Z-2** This comment provides general project opposition, indicating “the plan” 1) lacks historical context, 2) would harm habitat and the river environment, and 3) incorporates environmental injustice by taking away public access opportunities and increasing standing ponds of sewage. Please refer to MR-2, which addresses these comments.

**LETTER AA – VICKIE RODRIGUEZ**

**LETTER AA**

---

**From:** Vickie Rodriguez <vickie.rodriguez2@icloud.com>  
**Sent:** Tuesday, November 28, 2023 8:30 AM  
**To:** CEQA, CountyParks  
**Subject:** [External] Sewage

AA-1 | I have lived in IB since 1996 used to be stinky only when it rained now it's all the time apparently we don't have a loud enough noise to put this stink cleaned up we were allocated money to fix problem but instead you come up with another waste of money to find out where the problem is ? Does that make sense? No fix the damn issue with Mx we are the ones suffering daily I'm sure we have lost a lot of revenue from tourists we need gov newsome to bring his family on vacation to breathe in our stinky air Vickie Rodriguez

Sent from my iPhone

**LETTER AA RESPONSE – COMMENT AA-1**

**AA-1** This comment states general opposition and concerns related to sewage and suggests political and other solutions to fix sewage problems. This comment appears related to the list of projects included in the SB 507 Study and not the Proposed Project. For a response regarding the SB 507 Study, please refer to Response MR-1. As this comment does not address activities associated with the Proposed Project or the content or adequacy of the IS/MND, no further response is required.

**LETTER BB – VON PARTLOW**

**LETTER BB**

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**From:** Von Partlow <vonpartlow@yahoo.com>  
**Sent:** Wednesday, December 6, 2023 7:55 PM  
**To:** CEQA, CountyParks  
**Subject:** [External] Fw: Clean up and restore access to County Park-Don't destroy it  
**Attachments:** c4cc--tjrv-trail-map.PNG

[Sent from Yahoo Mail on Android](#)

--- Forwarded Message ---  
**From:** "Farmer Leon" <ibfarmerleon@gmail.com>  
**To:** "Leon Benham" <leonbenham59@gmail.com>  
**Sent:** Wed, Dec 6, 2023 at 9:29 AM  
**Subject:** Clean up and restore access to County Park-Don't destroy it

Please email this to San Diego County Parks

Attn: Mega Doran

Email: [CountyParksCEQA@sdcounty.ca.gov](mailto:CountyParksCEQA@sdcounty.ca.gov)

Subject: Stop the Stink -C4CC Public Rejects the TJRV Habitat Restoration Plan

This plan is unacceptable because it permanently incorporates historical Environmental Injustice of the past 40 years practiced on the homeowners and ranchers of the South Bay Community.

This plan will take away public access, destroys habit, ignores historical access, and incorporates a false science/land use policies which destroy the river environment.

BB-1 Taking away historical rights of public use trails from local residents, cub scouts, hikers, horse riders and creating more POLLUTION AND STANDING PONDS OF SEWAGE NEXT TO OUR HOMES is not restoration. It's ENVIRONMENTAL INJUSTICE practiced by the San Diego County Parks.

Please help us stop this plan and engage the San Diego Parks Department in a real restoration plan that benefits all stakeholders.

Please take the time to email the County of San Diego parks as instructed above.

Leon Benham  
619-964-9153  
[ibfarmerleon@gmail.com](mailto:ibfarmerleon@gmail.com)

**LETTER BB RESPONSE – COMMENT BB-1**

**BB-1** This comment provides general project opposition, indicating “the plan” 1) lacks historical context, 2) would harm habitat and the river environment, and 3) incorporates environmental injustice by taking away public access opportunities and increasing standing ponds of sewage. Please refer to MR-1 and MR-2, which addresses these comments.