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STATE OF CALIFORNIA—THE RESOURCES AGENCY PETE WILSON, Governor

CALIFORNIA COASTAL COMMISSION
SAN DIEGO COAST AREA
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December 7, 1992

City of San Diego
City Manager's Office
Attn: John Leppert
1010 Second Avenue, Suite 555
San Diego, CA 92101

Re: Fiscal '93 Sludge Mitigation Program

Dear Mr. Leppert:

Thank you for your submittal of the City's proposed work program for 1993 sludge mitigation monies. It is expected that the work program will be scheduled for Coastal Commission action at the February hearing, since the annual report should also be available at that time, and it seems appropriate to review them together.

Staff has given a preliminary, informal review of the proposed projects, and has identified concerns with several items. Although all of the proposed projects have merit, in and of themselves, they do not all appear to meet the intent, terms and specified conditions of the mitigation program. Staff will be able to endorse the monies proposed for the Fiesta Island Reserve, Ski Beach playground and Phase III of the Sea World Drive tree-planting project.

Two of the remaining proposals, the Tecolote Shores play area and North Crown Point walkway may also be endorsed at a staff level, but additional information is needed before such a determination is made. For both projects, as well as those listed above, please submit the project specifications and a detailed budget. Also, for the North Crown Point project, please submit a map showing the location of the proposed improvements. Detailed budget information is particularly critical with respect to the Tecolote Shores playground, since it is very difficult to understand why it costs so much to add improvements to an existing playground in this location, when the Ski Beach playground is also listed as consistent with the Americans with Disabilities Act, creates an entirely new playground, and costs less than an eighth of the total cost projected for Tecolote Shores.

Four other projects have been proposed at this time: acquisition of the Frost property; funding for liaison staff; a storm-drain education program and water quality sampling. None of these appear to meet the intent, terms and specified conditions of the mitigation program, as approved by the Coastal

Commission in 1989, and again in 1992, when the monies required for the program went from $1,000,000 a year to $2,000,000 a year. This program was approved to give immediate benefits to the public, offsetting the use of public parklands for the sludge processing facility. The general idea, in staff's opinion, was to provide additional public amenities, such as restrooms, picnic shelters, playground equipment, parking improvements, etc., that were presently needed in the Park, but could not be funded, as opposed to funding biological studies, home education programs, or administrative personnel.

Use of sludge mitigation monies for the acquisition of the Frost property raises several serious concerns. The terms of the mitigation program clearly state the money must be spent for public improvement projects within Mission Bay Park. The Frost site is in the Pacific Beach community, albeit adjacent to the northern boundary of the Park. As discussed in earlier phone conversations, once the Frost property is acquired and made a part of the Park, future improvements for public access and recreation purposes on the site may be a suitable use of the mitigation funds. However, it does not appear that the mitigation program provides for habitat restoration work itself.

Before even considering the monies for other uses, such as land acquisition, staff would need documentation that there are no other candidates for sludge funds within the existing Park, such as additional restrooms, fire pits, barbecues, etc. Since the City is proposing to delay construction of two restrooms, for which the Coastal Commission has already authorized funding in order to free up money for the Frost acquisition, it seems unlikely that the City could provide such documentation at this time. Furthermore, it appears that such a use of mitigation funds may require an amendment to the mitigation program in any case.

In summary, it would be desirable to agendize the 1993 Sludge Mitigation Work Program in February, both to coordinate it with the expected review of the Fiesta Island Annual Report, and because that meeting will be in San Diego, so increased public participation can be expected. In order to so schedule it, several items of additional information are required. Please submit a map of the North Crown Point walkway, the detailed budgetary information regarding the Tecolote Shores playground improvements, funding and phasing information for each proposed project as specified below, and whatever additional information you may wish to provide in support of those projects for which staff is herein identifying concerns.

Special Condition #4.d. of Coastal Development Permit #6-86-651-A6, which modified and augmented the sludge mitigation program initiated in #6-86-651-A5, specifically states that each year's work program is to include "the scope of work and projected phasing, implementation and funding of the resulting projects." The City's current submittal does not describe the scope

of work for any proposed projects, nor does it list projected construction and completion dates. Timely completion of authorized projects has been an ongoing concern of the Commission, as many of the projects approved in the first three years of the program have not yet been built. Finally, to that purpose, please submit an up-to-date accounting of all previously-approved sludge mitigation projects.

I apologize for the delay in responding to your submittal. Please call me if you have any questions.

Sincerely,

Ellen Lirley

Ellen Lirley
Coastal Planner

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