

Appendix L
Responses to Comments on the
Draft Initial Study/Mitigated Negative Declaration

The Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the San Diego River Trail - Carlton Oaks Golf Course Segment Project was distributed for public review on March 15, 2017, initiating a 30-day public review period ending on April 14, 2017. The document was made available online, at public libraries in the project area, and at SANDAG’s office. A total of eight letters and emails were received before the close of the public comment period. Pursuant to California Environmental Quality Act (CEQA) Guidelines §15088(a), “the lead agency shall evaluate comments on environmental issues received from persons who reviewed the Draft EIR and shall prepare a written response.” All comment letters received on the Draft IS/MND were evaluated for environmental issues, and written responses to comments on environmental issues were prepared.

Table 1 provides a list of the comment letters received, including details on the agency, organization, or individual that submitted the letter and the date of the letter. This appendix presents written responses to comments on environmental issues raised in these letters. The written responses describe the disposition of significant environmental issues raised, as required by CEQA Guidelines §15088(c).

Table 1 COMMENT LETTERS RECEIVED ON THE DRAFT IS/MND FOR THE SAN DIEGO RIVER TRAIL – CARLTON OAKS SEGMENT PROJECT		
Comment Letter	Public Agency, Organization, of Individual	Date of Letter
A	State Clearinghouse	April 14, 2017
B	California Department of Transportation	March 22, 2017
C	California Department of Fish and Wildlife	April 14, 2017
D	City of Santee	April 13, 2017
E	Padre Dam Municipal Water District	April 14, 2017
F	Preserve Wild Santee	April 8, 2017
G	Save Mission Trails	March 21, 2017
H	Alexandria Lowry	April 13, 2014



EDMUND G. BROWN JR.
GOVERNOR

STATE OF CALIFORNIA
GOVERNOR'S OFFICE of PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

April 14, 2017

Andrew Martin
San Diego Association of Governments
401 B Street, Suite 800
San Diego, CA 92101

Subject: San Diego River Trail Carlton Oaks Golf Course Segment
SCH#: 2017031037

Dear Andrew Martin:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. The review period closed on April 13, 2017, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

A-1

A-1 This comment letter confirms receipt and distribution of the Draft IS/MND and documents the proposed project's compliance with State Clearinghouse review requirements for the Draft IS/MND pursuant to CEQA. No further response is required.

**Document Details Report
State Clearinghouse Data Base**

SCH# 2017031037
Project Title San Diego River Trail Carlton Oaks Golf Course Segment
Lead Agency San Diego Association of Governments

Type MND Mitigated Negative Declaration
Description SANDAG proposes to construct the Carlton Oaks Golf Course Segment of the SDRT as a Class I bikeway for the exclusive use of people walking and riding bikes. The proposed bike path would extend a distance of approx two miles between Carlton Hills Blvd and West Hills Parkway through Mast Park, Mast Park West, and the Carlton Oaks Golf Course. The proposed project consists of two segments.

Lead Agency Contact

Name Andrew Martin
Agency San Diego Association of Governments
Phone 619 595-5375 **Fax**
email
Address 401 B Street, Suite 800
City San Diego **State** CA **Zip** 92101

Project Location

County San Diego
City San Diego, Santee
Region
Lat / Long 32° 50' 16" N / 117° 0' 30" W
Cross Streets West Hills Parkway and Carlton Hills Blvd

Parcel No.	Township	Range	Section	Base
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Proximity to:

Highways 52
Airports Gillespie Field
Railways
Waterways San Diego River, Forester Creek, Santee Lakes
Schools Mult
Land Use

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Cumulative Effects; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Landuse; Minerals; Noise; Other Issues; Population/Housing Balance; Public Services; Recreation/Parks; Septic System; Sewer Capacity; Social; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 11; Native American Heritage Commission; Regional Water Quality Control Board, Region 9

Date Received 03/15/2017 **Start of Review** 03/15/2017 **End of Review** 04/13/2017

DEPARTMENT OF TRANSPORTATION

DISTRICT 11, DIVISION OF PLANNING
4050 TAYLOR ST, M.S. 240
SAN DIEGO, CA 92110
PHONE (619) 688-6960
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*Serious Drought.
Help save water!*

March 22, 2017

11-SD-52
PM 13.6
San Diego River Trail
MND

Mr. Andrew Martin
SANDAG
401 B Street, Suite 800
San Diego, CA 92101

Dear Mr. Martin:

Thank you for including the California Department of Transportation (Caltrans) in the review process for the San Diego River Trail, Carlton Oaks Golf Segment project located adjacent to State Route 52 at West Hills Drive. Caltrans has received the Mitigated Negative Declaration (MND) for this project and have the following comments:

Any work performed within Caltrans right-of-way (R/W) will require discretionary review and approval by Caltrans and an encroachment permit will be required for any work within the Caltrans R/W prior to construction.

Additional information regarding encroachment permits may be obtained by contacting the Caltrans Permits Office at (619) 688-6158. Early coordination with Caltrans is strongly advised for all encroachment permits.

If you have any questions, please contact Roy Abboud at (619) 688-6968 or by email at roy.abboud@dot.ca.gov.

Sincerely,

JACOB M. ARMSTRONG, Branch Chief
Development Review Branch

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

B-1 The proposed project would not extend into the Caltrans right-of-way. If it is determined during the final design phase that work would be required within Caltrans right-of-way, SANDAG would coordinate with Caltrans to obtain an encroachment permit and any other required reviews and approvals from Caltrans.



State of California – Natural Resources Agency
 DEPARTMENT OF FISH AND WILDLIFE
 South Coast Region
 3883 Ruffin Road
 San Diego, CA 92123
 (858) 467-4201
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EDMUND G. BROWN JR., Governor
 CHARLTON H. BONHAM, Director



April 14, 2017

Andrew Martin, Senior Regional Planner
 San Diego Association of Governments
 401 B Street Suite 800
 San Diego, California 92101
 Andrew.martin@sandag.org

Subject: Comments on the Mitigated Negative Declaration for the San Diego River Trail Carlton Oaks Golf Course Segment, City of Santee, San Diego County, California (SCH # 2017031037)

Dear Mr. Martin:

The California Department of Fish and Wildlife (Department) has reviewed the above-referenced draft Mitigated Negative Declaration (MND) for the San Diego River Trail (SDRT) Carlton Oaks Golf Course Segment (proposed project). The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act, [CEQA] Guidelines § 15386) and pursuant to our authority as a Responsible Agency under CEQA Guidelines section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (CESA; Fish and Game Code [FGC] § 2050 *et seq.*) and FGC section 1600 *et seq.* The Department also administers the Natural Community Conservation Planning (NCCP) program. The City of San Diego participates in the NCCP by implementing its Multiple Species Conservation Plan (MSCP) Subarea Plan (SAP); the City of Santee (City) participates in the NCCP program in preparing its MSCP SAP.

The proposed project is located in the cities of San Diego and Santee in the area bounded by West Hills Parkway to the west, Mast Park to the east, Carlton Oaks Golf Course to the north, and the San Diego River to the south. The San Diego Association of Governments (SANDAG) proposes to construct a Class I bikeway as a transportation corridor for the exclusive use of walking and bike riding. The transportation corridor would extend a distance of approximately two miles between Carlton Hills Boulevard and West Hills Parkway through Mast Park, Mast Park West, the San Diego River, and the Carlton Oaks Golf Course. The proposed project consists of two segments, the Mast Park/Mast Park West Segment and the Golf Course Segment.

Mast Park/Mast Park West Segment

The Mast Park/Mast Park West Segment begins at the proposed project's eastern terminus in the Mast Park parking lot and extends west under the Carlton Hills Boulevard bridge and through Mast Park West to the Carlton Oaks Golf Course. The portion of this segment generally between the Carlton Hills Boulevard Bridge and the Carlton Oaks Golf Course is subject to a conservation easement (CE) held by the Department. The proposed project would begin at the southeastern corner of the paved parking lot in Mast Park and extend southwest down a vegetated slope and adjacent to a driveway that leads to an overflow parking area with a decomposed granite (DG) surface. At the bottom of the slope, the proposed project would

Conserving California's Wildlife Since 1870

C-1 This comment provides introductory statements about the roles and responsibilities of the California Department of Fish and Wildlife (CDFW) and summarizes the project description contained in the Draft IS/MND. No further response is required.

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April 14, 2017
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continue westward under the Carlton Hills Boulevard Bridge across a small drainage, then it would follow the alignment of an existing DG trail that extends east-west and northeast-southwest through Mast Park West for approximately 0.5 mile to the edge of the Carlton Oaks Golf Course. This existing trail consists of an eight- to 14-foot-wide DG trail lined with split-rail fencing, interpretive signage, benches at select locations, and a trailhead at Carlton Hills Boulevard. The east-west portion of the existing trail is approximately 14 feet wide with split-rail fencing placed approximately two feet inside the DG trail on both sides. The northeast-southwest portion of the existing trail is approximately eight feet wide and lined with split-rail fencing on both sides. The proposed project would be constructed along this existing trail alignment. The portion of the dirt trail between the trailhead and the Carlton Hills Boulevard Bridge would not be improved. Existing interpretive signage, benches, and bike racks along the existing trail would not be affected and would remain in their current location.

This segment of the transportation corridor is proposed to be a 10-foot-wide, all-weather, paved surface with two-foot-wide pervious shoulders on each side. Split-rail fencing would be installed along both sides of the bike path, although in some areas the existing split-rail fencing along the existing trail would be relocated and incorporated into the project. Along the east-west portion, the existing fencing on both sides of the existing trail would be moved to the outer edges of new bike path.

Along the northeast-southwest portion, the existing trail would be widened on the west side and the existing fencing along the eastern edge of the trail would remain while the existing fencing along the western edge of the existing trail would be moved to the outer edge of the new bike path. The drainage crossing just west of the Carlton Hills Boulevard Bridge is proposed as a ford with a natural bottom. Slope protection or similar measures to control erosion is also proposed at locations on the east side of the bike path in slope areas along the northeast-southwest portion of the bike. Manufactured slopes would be created to accommodate the bike path at a 2:1 or 3:1 gradient, where erosion is evident and vegetated with native plant species prior to completion of project construction.

Golf Course Segment

The Golf Course Segment begins at the eastern end of the Carlton Oaks Golf Course at the terminus of the Mast Park/Mast Park West Segment and extends west along a portion of the southern edge of the golf course to its western terminus at West Hills Parkway. This segment would be constructed on, or adjacent to, the existing berm along the southern edge of the golf course and northern edge of the river for a distance of approximately 1.5 miles. It would consist of a 10-foot-wide, all-weather, paved surface with two-foot-wide pervious shoulders and split-rail fencing on each side. The existing berm is proposed to be expanded, rebuilt, and/or reinforced. Slope protection or similar measures is proposed to control erosion. Manufactured slopes would be created at a 2:1 or 3:1 gradient and would be vegetated with native species prior to completion of project construction. Near the west end, the proposed project would install a bridge or similar structure to cross Sycamore Creek.

Other Project Features

In select areas where the proposed project would abut the golf course in close proximity to the playing field area, protective fencing would be installed along short sections on the north side (golf course side) of the project to protect path users from errant golf balls. Trees removed from

C-1
cont.

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 San Diego Association of Governments
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the golf course would be replaced at a 1:1 ratio with native or locally appropriate tree species that match the current golf course tree palette. Several retaining walls up to seven feet high would be constructed in certain locations along the north side of the project alignment within the golf course to reduce the proposed project's encroachment into the existing golf course. Additional retaining walls may be constructed in conjunction with the options for the West Hills Parkway connection. Pedestrian-scaled lighting may be provided at select locations along the proposed bike path to provide safety and security consistent with the San Diego River Park Master Plan.

Options for Connecting to West Hills Parkway

C-1
 cont.

At the proposed project's western end, SANDAG is considering three options for a connection to West Hills Parkway. The environmental effects of these options are analyzed in the draft MND. Each of these options would include a staircase at the bottom of the ramp that would connect to the existing West Hills Parkway sidewalk. The Switchback Ramp Option would construct a switchback ramp that would ascend north and then south along the slope adjacent to the roadway, with a connection point to the existing sidewalk near the westbound SR-52 overcrossing structure. The Curvilinear Ramp Option would include construction of a curvilinear ramp that would ascend northward along the slope and then curve west to connect perpendicularly to the existing sidewalk. While the Linear Ramp Option consists of a linear ramp along the western edge of the golf course that would gradually ascend northward and connect to the existing sidewalk just south of the intersection of West Hills Parkway and Carlton Oaks Drive.

We offer our comments and recommendations to assist SANDAG in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources.

Existing Conservation Easement Compatibility

C-2

As identified by the draft MND, implementing the project within the existing CE would be inconsistent with its terms. While the CE allowed for the construction and operation of two trails through the property, the proposed project is two to four feet wider than that specified by the CE. This proposal would impact sensitive species and habitats the CE is intended to protect. Provisions within the CE allowed the City of Santee to construct the current trails, which include edged DG surfaces with split-rail fences. The City of Santee previously constructed the DG trails as envisioned by the CE. However, the proposed project would widen the existing surfaces with impervious surfaces—the CE does not contemplate impervious surfaces. The Department

C-3

believes that impervious surfaces were specifically identified within the CE to reduce potential impacts related to water quality, erosion, hydrologic considerations, and aesthetics. While the draft MND states that an amendment to the CE is necessary, it should analyze how the proposed project would accomplish the goals of the CE.

C-4

Based on our review of the wildlife conservation easement (San Diego County Recorder's Office Document No. 2009-0694057) recorded over 43 acres (Assessor's Parcel Number 383-071-08) on December 16, 2009, and held by the Department for the benefit of wildlife, we disagree with the draft MND's conclusion that "based on an initial study, the Draft MND concludes that the project would not have a significant effect on the environment." (SANDAG, 2017; p. 6.) The project proposes to expand the physical dimensions of the existing trail to accommodate a transportation corridor, impact the City of San Diego's Multi-Habitat Planning Area (MHPA),

C-5

C-2 The Draft IS/MND notes in Section 4.0, Other Agency Permits and Approvals (page 14), that the project would require an amendment to the 2009 Mast Park Conservation Easement (included as Appendix K of the Final IS/MND) held by CDFW. In addition, SANDAG acknowledges that the Conservation Easement (Exhibit C, page 18) called for the east-west trail to have a width of 10 feet, and for the generally north-south trails to have a narrower width of 4 feet. The Conservation Easement called for both trails to consist of a decomposed granite (DG) surface, and for peeler log fencing along sides of the trails to discourage encroachment into adjacent riparian areas.

SANDAG further acknowledges that the project proposes trail widths that are wider than the widths called for in the Conservation Easement. However, CDFW is incorrect when it asserts that, "The City of Santee previously constructed the DG trails as envisioned by the CE." In order to understand and evaluate how the project would affect biological resources within the Conservation Easement, it is necessary to consider the *actual* conditions of the existing trails, which are different than what was called for in the Conservation Easement. The DG surface of the existing east-west trail is approximately 14 feet wide, with existing lodge pole fencing located about two feet inside the edge of trail on either side. Thus, the existing east-west trail is already approximately 4 feet wider

C-2 cont. than the 10 foot-wide trail called for in the Conservation Easement. The DG surface of the existing north-south trail is approximately 8 feet wide with lodge pole fencing along both sides, which is approximately 4 feet wider than the 4 foot-wide trails called for in the Conservation Easement.

The proposed project through the Mast Park West Conservation Easement would be constructed along the existing alignment of the existing DG trails that extend generally east-west and north-south through Mast Park West for approximately 0.5 mile. The project would construct a 10-foot-wide all-weather surface with two-foot-wide unpaved shoulders and lodge pole fencing on each side, for a total width of approximately 14 feet. For the east-west segment, the all-weather surface and unpaved shoulders would be located within the existing 14-foot-wide DG trail, and the lodge pole fencing would edge the shoulders. For the north-south segment, the project would utilize the existing 8-foot-wide trail, and the additional approximately 6 feet of width would be located on either side of the existing trail (three feet on either side).

SANDAG has designed the proposed project to utilize existing trails in order to avoid adverse impacts to habitat and sensitive species within Mast Park West to the greatest extent feasible. Where there are adverse impacts to biological resources within Mast Park West (such as the widening of the north-south trail, the drainage improvements to low-flow crossings near Carlton Hills Boulevard, and temporary noise levels during construction) and elsewhere in the project area, the Draft IS/MND identified 12 feasible mitigation measures (BIO-1 through BIO-12) that would avoid these impacts or substantially lessen them to below a level of significance. As documented in the Draft IS/MND, implementation of mitigation measures BIO-1 through BIO-12 would ensure there are no significant impacts to sensitive species and habitats within Mast Park West and throughout the project area.

C-3 SANDAG acknowledges that the Conservation Easement called for DG trails, and as described and analyzed in the Draft IS/MND, proposes to provide a multi-use path with an all-weather surface for the proposed project. SANDAG agrees with CDFW that it is important to analyze potential impacts of impervious surfaces related to “water quality, erosion, hydrologic considerations, and aesthetics,” and included a detailed analysis of each issue in the Draft IS/MND. As summarized below, the Draft IS/MND analysis demonstrates that constructing the project with impervious surfaces would not result in significant impacts related to water quality, erosion, hydrology, or aesthetics. CDFW does not present any facts or evidence supporting its assertion that impervious surfaces are inconsistent with the purposes of the Conservation Easement because such surfaces would have impacts related to water quality, erosion, hydrologic considerations, and aesthetics.

C-3 cont. **Water Quality:** As discussed in Section 7.9 (a) of the Draft IS/MND (page 63), source control and site design Best Management Practices identified in the Water Quality Analysis prepared for the project (Appendix I) would be incorporated into the project to avoid water quality impacts related to discharge of pollutants into the San Diego River and downstream receiving waters. The proposed project would be used by people walking and biking, and therefore it would not collect pollutants that would be transported into nearby water bodies or habitats during storm events. Additionally, the project would be subject to conditions contained in the Section 401 Clean Water Act Water Quality Certification that is required for the project to protect water quality, such as implementation of source control and site design Best Management Practices. Examples include, but are not limited to, spill prevention and control, sediment/erosion control, and materials/storage measures; vehicle and equipment cleaning protocols; maintaining natural drainage pathways and hydrologic features; and minimize soil compaction.

Erosion: The project has been designed to minimize erosion potential, as discussed in Section 7.6(b) and Section 7.9(c) in the Draft IS/MND. For the portion of the proposed project within Mast Park West, runoff would be directed to three existing low-flow drainage crossings with surrounding rip-rap or similar erosion prevention design. Within the golf course segment, portions of the proposed project would be constructed on, or adjacent to, the existing berm, and some areas along the existing berm have been subject to erosion. The project would reinforce and widen the berm to accommodate the proposed project. In certain areas where erosion is evident, slope protection would be installed on the south side of the berm to provide erosion control. Manufactured slopes on both sides of the berm would also be vegetated to control erosion. Runoff would be conveyed toward the golf course to existing localized collection areas that would infiltrate into landscaped areas or continue to direct flows into the river through existing culverts and the existing storm drain system.

Hydrology: As discussed in Section 7.9(c) and (d) in the Draft IS/MND, the project would increase the 100-year on site storm flow within the localized basins within the golf course by approximately 4.74 cubic feet per second (cfs) and by approximately 0.38 cfs east of the golf course (within Mast Park West). This change of about 4.74 cfs is negligible compared to the overall flowrate for the San Diego River of approximately 36,000 to 38,000 cfs according to FEMA and 48,000 to 50,000 cfs according to the City of Santee. Therefore, the proposed project would not adversely affect the hydrologic conditions of the project area or downstream areas associated with substantial erosion, siltation, or flooding.

C-3 cont. **Aesthetics:** The proposed all-weather surface would be at ground level and the project occurs in an area that is not highly visible from surrounding public vantage points, as discussed in Section 7.1(a) in the Draft IS/MND (page 18). Moreover, the project would be constructed along the alignments existing trails where previous disturbance has occurred within the visual context of this portion of the San Diego River corridor. The project proposes to incorporate design treatments into the bike path surface such as use of earth-toned colors and textures during final design to further visually blend project elements with the existing visual environment.

C-4 SANDAG acknowledges that the Mast Park West property includes the following wildlife and habitat values (“conservation values”): high quality habitat for least Bell’s vireo, Southern California rufous-crowned sparrow, yellow-breasted chat, yellow warbler, and the southwestern pond turtle, and contains southern cottonwood-willow riparian forest, fresh water pond, and non-native vegetation habitats, and that the Conservation Easement seeks to “prevent any use of the (Mast Park West) property that will impair or interfere with the conservation values of the Property.” (Conservation Easement, Page 2, #1) The analysis of the Draft IS/MND and responses to comments C-2 through C-22 demonstrate that the proposed project including mitigation measures would not result in significant impacts to any of these high quality habitats or sensitive species, and therefore, the proposed project would not impair or interfere with the conservation values of the Property. In addition, prior to construction, SANDAG would be required by state and federal resource agencies (including CDFW) that are responsible for protecting these habitats and species to obtain permit approvals and implement compensatory and other mitigation measures to fully offset impacts to these habitats and species. The proposed project would also require an amendment to the existing Conservation Easement, as explained in the Draft IS/MND.

C-5 CDFW expresses disagreement with the Draft IS/MND conclusion that the proposed project would not have a significant effect on the environment for several alleged reasons, each of which are addressed below. As explained below, CDFW does not present any facts or other evidence supporting its assertion that the proposed project would have a significant effect on the environment.

“The project proposes to expand the physical dimensions of the existing trail to accommodate a transportation corridor”

Please also see response to comment C-2 explaining that the proposed project has been designed to utilize existing trails in order to avoid and minimize impacts to sensitive habitat and species within Mast Park West as much as is feasible. As also explained in the response to comment C-2,

C-5 cont. the Draft IS/MND identifies 12 feasible mitigation measures (BIO-1 to BIO-12) to avoid or substantially lessen impacts to biological resources to a level less than significant. It also identifies one feasible mitigation measure for the protection of cultural resources. CDFW does not provide any facts or evidence demonstrating that the physical dimensions of the proposed project (or any other aspects of the proposed project) would result in a significant and unavoidable effect on the environment.

“The project proposes to impact the City of San Diego’s Multi-Habitat Planning Area (MHPA)”

The proposed project is partially located within the City of San Diego MHPA, and Section 7.4(f) of the Draft IS/MND included a detailed analysis demonstrating that the proposed project would not conflict with the City of San Diego’s Multiple Species Conservation Program (MSCP) Subarea Plan or any other adopted or approved habitat conservation plan. CDFW does not present any facts or evidence supporting its assertion that the project would “impact” the City of San Diego’s MHPA and therefore have a significant and unavoidable effect on the environment.

“The project proposes to deposit fill within the San Diego River”

Section 7.4(c) of the Draft IS/MND included a detailed analysis demonstrating that the proposed project would implement mitigation measures BIO-4, BIO-5, and BIO-11 to ensure that it would not have a significant impact related to filling or other effects to the San Diego River and other wetlands and non-wetland water resources protected by state and federal laws and regulations. Implementation of mitigation measures BIO-4, BIO-5, and BIO-11, among other things, would require SANDAG to perform mitigation for impacts to water resources and habitats associated with San Diego River, subject to the approval of CDFW and other resource agencies. Section 7.9(c) and (d) of the Draft IS/MND included detailed analysis showing that the design of the proposed project, including the import of approximately 10,000 cubic yards of fill (net) into the San Diego River floodplain, would not result in any significant impacts related to on- or off-site flooding or erosion. CDFW does not present any facts or evidence that the mitigation measures are inadequate or infeasible or otherwise support its assertion that the project’s depositing of fill within the San Diego River would result in a significant and unavoidable environmental effect.

“The project proposes to increase the anthropogenic exposure to species listed under CESA and the federal Endangered Species Act (ESA) and other sensitive species”

Section 7.4(b) of the Draft IS/MND (page 40) provided an analysis demonstrating that potential indirect impacts of the project to sensitive

COMMENTS

RESPONSES

Andrew Martin, Senior Regional Planner
 San Diego Association of Governments
 April 14, 2017
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C-5
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deposit fill within the San Diego River, and increase the anthropogenic exposure to species listed under CESA and the federal Endangered Species Act (ESA) and other sensitive species. The project-proposed expansion and increase is not contemplated by the original CE and is contrary to the purpose and intent (biological mitigation) for which the CE was established. The Department believes that the proposed project has the potential to significantly affect the environment based on the potential impacts to biological resources and impacts to an existing mitigation site.

Potential Take of Listed Species

C-6

The project is proposed to be constructed within sensitive habitats (e.g., cottonwood-southern willow forest, and fresh water pond) that support resident and migratory sensitive species including least Bell's vireo (*Vireo bellii pusillus*), southwestern pond turtle (*Emys marmorata*), and yellow-breasted chat (*Icteria virens*) among others. The draft MND does not provide an analysis substantiating its conclusion that protected species "...would not be directly affected by the proposed project..." (SANDAG, 2017; p. 48). The Department's review of the draft MND suggests the proposed project may result in direct and/or indirect loss of habitat (e.g., trail widening, increased anthropogenic presence, noise and light pollution, and construction activities) supporting sensitive species and could result in direct and/or indirect take (as defined by FGC § 86) of CESA-listed species or species of special concern (SSC). Take of CESA-listed species is prohibited unless authorized through an incidental take permit, NCCP permit or equivalent. Currently SANDAG does not participate in an NCCP. Accordingly, we recommend that the final MND include an analysis of the proposed project's potential to directly and indirectly impact (e.g., noise, lighting, increased anthropogenic presence, etc.) CESA-listed and SSC species, and that an incidental take permit pursuant to FGC section 2080 *et seq.* is pursued to avoid unauthorized take of CESA-listed species.

C-7

Furthermore, the draft MND identified that white-tailed kite (*Icteria virens*) utilized the biological study area. White-tailed kite is a Fully Protected Species pursuant to FGC section 3511. No mechanism exists to permit take of Fully Protected Species unless authorized pursuant to a NCCP. Accordingly, any potential impacts to Fully Protected Species must be thoroughly analyzed to ensure take of the species is completely avoided.

Increased Anthropogenic Presence

C-8

The draft MND does not analyze the number, type, frequency, or intensity of land uses associated with replacing the current trail with a transportation corridor. Of particular concern are impacts to the existing mitigation area conserved for the benefit of sensitive species and their habitats. Additionally, the draft MND does not fully analyze the impacts from these activities on the San Diego River corridor, nor does it provide mitigation measures to address these impacts.

C-9

Human habitation and recreational uses have been demonstrated to impact a suite of avian, mammalian, amphibian, and reptile species; for example, Bosakowski *et al.* (1992) found that nest site location in Cooper's hawks appeared to be significantly more tolerant of car traffic than sources of human habitation. Similarly, Knight and Skagen (1988) observed that the effects of recreation activities on raptor species include: (1) altering the distribution of raptors; (2) disrupting nest attentiveness; (3) causing abandonment of breeding territories; (4) reducing productivity; and (5) altering foraging behavior. Miller *et al.* (2001) found that natural land

C-5
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habitat and species, including impacts related to potential increases in human activity in the project area, would not result in significant effects to sensitive species of habitat. The project would include a fence along both sides to discourage people from entering sensitive habitat areas adjacent to the proposed project. Moreover, the existing habitats and species in the project area already experience anthropogenic exposure due to the pedestrians and bicyclists using the existing trails and users of the existing golf course. CDFW does not present any facts or evidence supporting its assertion that anthropogenic exposure would increase to such an extent under the proposed project, and that the species present in the project area would be so vulnerable to such an increase in anthropogenic exposure, that it would result in one or more significant and unavoidable impacts to a species listed under CESA, ESA, or otherwise considered sensitive. Please also see response to comment C-8.

C-6

The comment incorrectly asserts that the Draft IS/MND does not provide analysis to substantiate the conclusion that protected species would not be directly affected by the project. In fact, Section 7.4 of the Draft IS/MND provided a detailed analysis of potential direct and indirect project impacts to special status species based on empirical data and field surveys of the project area conducted for the project in accordance with applicable protocols. Section 7.4 analyzes in detail the potential for impacts to special status species associated with "trail widening, increased anthropogenic presence, noise and light pollution, and construction activities," contrary to CDFW's assertion that analysis of these topics was not included in the Draft IS/MND.

The Draft IS/MND concluded that the project could result in potentially significant direct and indirect impacts to special status animal species, including Cooper's hawk, least Bells' vireo, white-tailed kite, yellow-breasted chat, and yellow warbler. Feasible mitigation measures identified in the Draft IS/MND (BIO-1 through BIO-4) and MMRP (Appendix M) are proposed by SANDAG that would avoid or substantially lessen impacts to below a level of significance. The analysis contained in Section 7.4(a) notes on page 31 that the project would permanently impact approximately 5.7 acres of USFWS-designated critical habitat for the least Bell's vireo, of which approximately 0.52 acre would be to wetland or riparian habitats that are potentially suitable for least Bell's vireo. As such, SANDAG anticipates that a Section 7 consultation under the Endangered Species Act with the USFWS will be required. If it is determined during the Section 7 consultation that a take of vireo or other listed species would occur, then an Incidental Take Permit pursuant to

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- C-6 cont. Section 2080 of the Fish and Game Code may also be required from CDFW. Section 4.0 of the Final IS/MND (page 14) has been revised to add a Section 7 consultation with USFWS and an Incidental Take Permit from CDFW to the list of permits and approvals from other agencies that SANDAG may need for project implementation.
- C-7 Section 7.4(a) of the Draft IS/MND included a detailed analysis of potential direct and indirect project impacts to special status species, including the white-tailed kite and concludes that the project could result in potentially significant direct and indirect impacts to the white-tailed kite. Mitigation measures identified in the Final IS/MND (BIO-1 through BIO-4) and MMRP (Appendix M) are proposed by SANDAG that would avoid or substantially lessen impacts to this special status species to below a level of significance.
- C-8 Please see response to comment C-5 explaining that the Draft IS/MND did include an analysis of indirect impacts to biological resources associated with increased human activity (anthropogenic exposure) in the project area. The Draft IS/MND did not analyze “the number, type, frequency, or intensity of land uses” associated with the proposed project because the proposed project does not propose any land use changes; the Draft IS/MND does provide a detailed, 10-page description of the proposed project in Chapter 2.0, and a comprehensive analysis of the indirect and direct environmental impacts associated with all aspects of construction and operation of the proposed project as required by CEQA.
- C-9 This comment cites several studies that have examined the effects of human habitation and recreational uses on various avian, mammalian, amphibian, and reptile species, but as explained below, this comment does not present any information that would change the conclusions of the Draft IS/MND. Section 7.4 of the Draft IS/MND provided a detailed analysis of the proposed project’s direct and indirect impacts to sensitive species, habitats, and other biological resources, and explains why the 12 feasible mitigation measures identified in the analysis would ensure that biological resources impacts are less than significant. Moreover, the CDFW comment letter neglects to mention that the proposed project area is already subject to various activities associated with human habitation including pedestrians, bicyclists, golfers, golf course vehicles and equipment (e.g., golf carts, lawn mowers), vehicle traffic noise from the adjacent SR 52 freeway and other adjacent major roadways, and adjacent urban development.
- CDFW first cites Bosakowski *et al.* (1992), in which Bosakowski *et al.* conclude that nesting Cooper’s hawks in northern New Jersey and southeastern New York, “can be remarkably tolerant to car traffic.” SANDAG has reviewed this study, and contrary to CDFW’s comment,

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C-9
 cont.

managers can implement spatial and behavioral restrictions to reduce the effects of recreationists' presence on wildlife while Knight and Skagen (1988) conclude that recreational activities can be mitigated either through preclusion of recreation or through spatial restrictions on recreational opportunities. In order to address potential impacts from edge effects we recommend SANDAG review alternatives that realign the transportation corridor through existing streets or propose alignments that do not encroach on the San Diego River.

C-10

Increased anthropogenic use and a reliance on the proposed transportation corridor (presently a trail) will increase safety and maintenance efforts. According to the draft MND, "pedestrian-scaled lighting may be provided at select locations along the proposed bike path to provide safety and security consistent with the San Diego River Park Master Plan (City of San Diego 2013a), which calls for lighting along the San Diego River Pathway." (SANDAG, 2017.) Chief among these concerns is: lighting, user safety, and trash management.

Lighting: The use of 12-foot-tall metal or concrete light poles are inappropriate uses within a mitigation site supporting endangered, threatened, and sensitive species regardless of specifications within the San Diego River Park Master Plan. Lighting is of concern given the sensitive resources and wildlife corridor (e.g., the San Diego River) that would be adversely impacted by night lighting. The draft MND states that the lighting envisioned for the bikeway will "...consist of metal or concrete poles and triangular fixtures painted natural sand or warm gray/brown at a maximum height of 12 feet, and (2) be directional with shields to avoid light overspill into adjacent habitat. Proposed project lighting would comply with these design guidelines; lights would be shielded and directed towards the bike path and away from the adjacent San Diego River and its habitats." (SANDAG, 2017; p. 13.) However, lighting cannot be adequately shielded to avoid impacts to wildlife and wildlife corridors when the lighting proposed consists of 12-foot-high poles located directly within the affected habitat. Lighting within sensitive mitigation sites should be eliminated to avoid spillover effects. Furthermore, the draft MND states that construction is estimated to take approximately 12 months without mention of eliminating or mitigating night work during the bird nesting season (see comment below under Avian Nesting Season).

C-11

User Safety: The Department is concerned that the proposed project would result in additional habitat impacts from vegetation clearing associated with maintaining wide, visually open safety corridors along the transportation corridor. The draft MND should analyze the potential for safety-driven impacts to habitats (e.g. impacts related to initial and/or future clearing of vegetation, maintenance of such cleared area, etc.); identify compensatory mitigation, and identify the appropriate management entity and funding to implement management/patrolling of the transportation corridor without increasing habitat loss.

C-12

Trash Management: Efforts needed to manage trash and illegal dumping will increase commensurate with corridor use. The Department is concerned that the draft MND does not identify the need for additional management actions, an appropriate managing entity, or the accompanying funding to accomplish those actions. Unabated trash can artificially augment urban-adapted mesopredators, influence population dynamics, and degrade habitat quality. The final MND should identify a refuse management entity, identify a refuse management plan (with work schedule), and require sufficient funding to implement the refuse management plan.

C-9
 cont.

it does not conclude that, "Cooper's hawks appeared to be significantly more tolerant of car traffic *than sources of human habitation*" (emphasis added). As a result, this study does not provide evidence that the proposed project, which would provide a multi-use path for people to walk and bike, would have significant impacts on Cooper's hawk or any other sensitive species.

CDFW then cites Knight and Skagen (1988) to list several observed effects of "recreation activities" on raptor species and to identify "preclusion of recreation" and "spatial restrictions on recreational opportunities" as mitigation measures "to reduce the effects of recreationists' presence on wildlife." However, CDFW provides no further explanation of the types of "recreation activities" analyzed in that study; makes no attempt to connect the "observed effects" or mitigation measures reported in this study to conditions in the proposed project area or to the analysis of the proposed project. That said, SANDAG proposes to locate the proposed project within existing formal and informal trails to avoid biological resources impacts as much as feasible, and to provide fencing along both sides of the entire length of the proposed project as "spatial restrictions" to discourage people from entering sensitive habitat areas.

Similarly, CDFW cites Miller *et al.* (2001) to report that, "spatial and behavior restrictions (can) reduce the effects of recreationists' presence on wildlife" but makes no attempt to explain how this information is relevant to the Draft IS/MND analysis of biological resources impacts.

Please see response to comment D-21 for discussion of the multi-year public process that SANDAG engaged in to select the alignment of the proposed project.

C-10

Section 2.0 of the Draft IS/MND (page 13) described that lighting may be provided along the length of the proposed project and that final decisions about lighting and lighting design would be determined during final design in consultation with the resource agencies, including CDFW, during project permitting. If lighting is to be included along the proposed project, it would not be placed directly within sensitive habitat as asserted by CDFW, but within the developed footprint of the bike path (which within Mast Park West would be located within existing formal trails). CDFW asserts that lighting "should be eliminated to avoid spillover effects" but as explained in the Draft IS/MND, proposed lighting would be shielded "to avoid light overspill into adjacent habitat" (page 13). In other words, only lighting that avoids light overspill into adjacent habitat

C-10 would be provided as part of this project; lighting that does overspill into adjacent habitat is not proposed and would not be provided as part of the proposed project.

In addition, CDFW raises concerns with night time construction, but the Draft IS/MND stated on page 13 that construction is anticipated to occur during daytime hours. No night time construction activities that would require lighting would occur.

C-11 The proposed project would not result in additional habitat impacts from vegetation clearing beyond the amounts that were identified in the Draft IS/MND. Impacts to habitat resulting from the project were comprehensively identified in Section 7.4(b) of the Draft IS/MND (see Table 3 on page 36). Impact areas were calculated to account for direct temporary and permanent habitat and sensitive vegetation community impacts. Direct temporary impacts are those that would be caused by construction activity, but vegetation/habitat would be re-established in place following completion of construction. Direct permanent impacts are those where the ground disturbance would be permanent; the biological resources would be replaced by project elements. Compensatory mitigation for habitat loss resulting from the project was identified in the Draft IS/MND (mitigation measures BIO-4, BIO-5, and BIO-11). The City of San Diego and/or the City of Santee would be responsible for maintenance of the proposed project. Moreover, mitigation measure BIO-6 would require that native vegetation be trimmed to the ground surface rather than uprooted whenever feasible.

C-12 As discussed in Section 7.17(f) of the Draft IS/MND, some users of the proposed project may have trash to dispose of while using the facility (e.g., food wrappers, beverage bottles), but major quantities of unabated trash would not be generated. Trash receptacles are currently provided along the existing trails within Mast Park West, which are maintained by the City of Santee. In addition, trash and litter are already present through the project area. The maintenance of the project, including trash management, would be provided by the City of Santee and/or City of San Diego as the agencies that would be ultimately responsible for maintenance and operation of the proposed project following completion of construction. SANDAG also anticipates that the specific aspects of project-related trash management would be addressed during the project permitting process with CDFW and other resource agencies.

With regard to illegal dumping, there is no analysis or evidence supporting CDFW's comment that a multi-use path for people to walk and bike would increase the practice of illegal dumping on trails that are already open to the public. This assertion is speculative and CEQA does not require evaluation of such speculative effects pursuant to CEQA Guidelines Section 15145.

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Consistency with the City of San Diego MSCP

C-13

The proposed project includes impacts within the City of San Diego’s MHPA, including impacts to City of San Diego wetlands pursuant to the Environmentally Sensitive Lands regulations. The draft MND should discuss how the proposed project is a compatible use within MHPA given that the project is not a passive trail (passive trails may be allowed within the MHPA) but rather serves as both a transportation route and a recreational facility. “One of the goals of the Regional Bike Plan is to significantly increase the number of people who bike and the frequency of the bicycle trips for all purposes (e.g., not just for recreation but also everyday trips).” (SANDAG, 2017; p. 5.) Furthermore, the goal of the proposed project aims to reduce greenhouse gas emissions through a reduction of vehicular trips “by increasing the number and frequency of all trips completed by bike. Regional Bike projects like the proposed project help the San Diego region meet climate change goals to reduce greenhouse gas (GHG) emissions from passenger vehicles.” (*Ibid.*) The proposed project’s role in the broader goal underscores the increase in volume of trips the proposed trail is intended to receive. For this reason, the trail potentially poses a significant, long-term impact beyond the mitigation area and sensitive species for which the Department holds an easement.

Protective Screening

C-14

As discussed during a site visit with SANDAG staff and the Department (February 9, 2017), netting (e.g., fence fabric), particularly adjacent to vegetation, poses a risk to wildlife (e.g., birds) from entrapment and could result in take (FGC § 86). “In some areas along the golf course where the proposed project would be in close proximity to the playing field area, protective fencing would be installed along short sections on the north side (golf course side) of the project to protect path users from getting hit by errant golf balls. The fencing would be up to 10 feet tall and could be constructed from a variety of materials, such as wood framed, welded wire mesh, or chain link.” (SANDAG, 2017; p. 9.) The Department recommends native vegetative screening be used to minimize risks to wildlife and maintain a more natural aesthetic. Given that the least Bell’s vireo are known to occupy the proposed project site, the placement of any structure which would directly or indirectly result in unauthorized take of least Bell’s vireo is prohibited unless otherwise authorized. As previously recommended during the site visit, native trees or other suitable screening materials should be utilized to ensure that no take of vireo or other avian species occurs.

Fill within the San Diego River

C-15

The Department has regulatory authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (which may include associated riparian resources) of any river, stream, or lake or use material from a river, stream, or lake. For any such activities, the project applicant (or “entity”) must provide written notification to the Department pursuant to section 1600 *et seq.* of the FGC. Based on this notification and other information, the Department determines whether a Lake and Streambed Alteration Agreement (LSA) with the applicant is required prior to conducting the proposed activities. Our issuance of a LSA for a project that is subject to CEQA will require CEQA compliance actions by the Department as a Responsible Agency. As a Responsible Agency under CEQA, the Department may consider SANDAG’s MND for the project. To minimize additional requirements by the Department pursuant to section 1600 *et seq.* and/or under CEQA, the document should fully

C-13 Sections 7.4(e) and 7.4(f) in the Draft IS/MND provide a detailed analysis explaining that the proposed project would not conflict with the City of San Diego Environmentally Sensitive Lands regulations or the provisions, policies, management directives, or land use adjacency guidelines contained the City of San Diego’s MSCP Subarea Plan. The analysis explains that the proposed project would not adversely affect the functions and values of the biological resources within the MHPA. CDFW also asserts that the proposed project would have significant long-term impacts to sensitive species because the proposed project would encourage people to ride bikes instead of drive, but no evidence is presented to support this claim of additional people riding bikes having adverse impacts on sensitive species or habitats. Please see the responses to comments C-2 through C-22 and Section 7.4 of the IS/MND explaining that the proposed project would not result in any significant and unavoidable biological resources effects.

C-14 As stated in Section 7.1(a) and Section 7.1(c) of the Draft IS/MND, trees are proposed to provide visual screening of the safety fencing. Section 7.4(d) explains why the safety fencing would not interfere substantially with the movement of any migratory species. The project does not propose netting. CDFW asserts that “netting” could result in “entrapment” and “unauthorized take” of birds and least Bell’s vireo but does not provide any facts or evidence demonstrating that the type of safety fencing described in the Draft IS/MND would result in significant impacts to least Bell’s vireo or other avian species.

C-15 Section 4.0 and Section 7.4(c) of the Final IS/MND identifies that a Streambed Alteration Agreement pursuant to Fish and Game Code Section 1602 from CDFW would be required for the project. SANDAG understands that CDFW is a Responsible Agency under CEQA and may elect to rely on the Final IS/MND to comply with CEQA for the Streambed Alteration Agreement. Project impacts to potential CDFW-jurisdictional areas and compensatory mitigation to avoid or reduce impacts to below a level of significance are identified in Section 7.4(c) of the Final IS/MND and the MMRP (Appendix M).

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- C-15 cont. identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA.¹
- C-16 To minimize fill within the San Diego River, the proposed project should consider an alternative that spans the San Diego River. Should alternatives to span the San Diego River prove infeasible, designs minimizing the overall footprint and facilitating the river's flow should be analyzed. Furthermore, project appurtenances including proposed retaining walls or other permanent structures, should not impede the river's flow. According to the MND "[s]everal retaining walls up to approximately seven feet high would be constructed in certain locations along the north side of the project alignment within the golf course to reduce the proposed project's encroachment into the existing golf course. Additional retaining walls may be constructed in conjunction with the options for the West Hills Parkway connection." (SANDAG, 2017; p. 5.) The MND should analyze the full breadth of potential impacts to the San Diego River, including retaining walls.
- C-17 While the draft MND identifies slope protection, the need to place permanent fill within the San Diego River is not demonstrated in the document. As discussed during our February 9, 2017, field visit, slope protection and erosion control features should be implemented only as site conditions dictate. For example, during the site visit one erosional feature was found to be mechanical erosion of the slope from illegal pedestrian access to the river. This illegal access subsequently aggregated sheet flow, causing minor erosion of the existing trail. Events such as this example may be remedied by restoring adequate drainage patterns without necessitating slope protection or other permanent structures within the San Diego River.
- C-18 Avian Nesting Season
 The draft MND states that construction is estimated to take approximately 12 months (SANDAG, 2017; p. 5), but does not describe steps taken to minimize impacts to nesting birds including least Bell's vireo, southwestern willow flycatcher, Cooper's hawk or other sensitive species. The project proposes to impact a biological mitigation area that was created with the express purpose of preserving and maintaining habitat for biological resources, but the draft MND does not include specific mitigation measures to avoid construction during the nesting season. Construction during the nesting season should be completely avoided for any mitigation site.
- C-19 Mitigation Measures
 BIO-3/BIO-10: Mitigation Measure BIO-3 should be revised to require an effective revegetation plan. The Department advises that revegetation plans identify goals (e.g., reference sites) prior to project approval, incorporate measurable performance standards (intermediate and final performance standards) that meet or exceed pre-project conditions. Revegetation plans should include peer review and coordination.

- C-16 The proposed project alignment would be constructed primarily along the existing alignment of existing trails within Mast Park West and along an existing informal trail along the existing berm adjacent to the San Diego River and adjacent to the golf course in order to minimize fill within the San Diego River. The proposed project does not impede the river's flow. Constructing the project on a structure that would not utilize the berm in order to not constrain the flow of the river would most likely need to be adjacent to the existing berm which would either be within the golf course, greatly affecting their operations, or south of the berm in the river channel with larger environmental effects. Under the terms of its lease with the City of San Diego, the golf course owners are allowed to maintain the berm in its existing condition, so it would remain in either situation. Project effects on the hydrologic conditions of the San Diego River were analyzed as part of the Hydrology Study prepared for the project (Appendix J), which accounted for all proposed project features including retaining walls. The hydrology analysis, summarized in Section 7.9 of the Final IS/MND, concludes there would be no significant peak flow increase generated by the project. The proposed project would increase the 100-year on site storm flow within the localized basins within the golf course by approximately 4.74 cfs and by approximately 0.38 cfs east of the golf course within Mast Park West. This change is considered a negligible increase compared to the overall flowrate for the San Diego River rate of approximately 38,000 cfs and would not adversely affect the project area or downstream areas.
- C-17 As discussed in Section 7.6(b) of the Draft IS/MND, portions of the proposed project would be located on the existing berm adjacent to the golf course, and some areas along the existing berm have been subject to erosion. In order to safely accommodate the proposed Class I bike path, the project would reinforce and widen the berm in order to stabilize it. In only the minimum areas where it is necessary based on site conditions, slope protection would be installed on the south side of the berm to provide erosion control. The specific locations where this is proposed were identified on Figures 3a and 3b in the Draft IS/MND, and are based on existing site conditions where erosion is evident, as well as professional engineering judgement on the areas in which slope protection is needed to prevent further erosion that could undermine the stability of the proposed project. The proposed slope protection areas

¹ A notification package for a LSA may be obtained by accessing the Department's web site at www.wildlife.ca.gov/habcon/1600.

C-17 within resource agency jurisdiction would be further discussed with the cont. resource agencies including CDFW during project permitting.

C-18 This comment makes assertions about the Draft IS/MND that are not true. Sections 7.4(a) and 7.4(d) of the Draft IS/MND adequately analyzed potential impacts to nesting birds, including the Cooper’s hawk, least Bell’s vireo, white-tailed kite, yellow-breasted chat, yellow warbler, and other nesting birds protected by the Migratory Bird Treaty Act. Mitigation measures BIO-1, BIO-3, and BIO-12 identified in the Draft IS/MND and MMRP (Appendix M) are proposed by SANDAG that include detailed steps to avoid impacts to nesting birds during project construction, including avoidance of construction during the nesting seasons for the aforementioned nesting bird species and other species protected by the Migratory Bird Treaty Act.

C-19 In the Draft IS/MND, SANDAG identified mitigation measure BIO-10, which requires revegetation with native species for all temporary disturbance within sensitive habitat. In response to this comment, SANDAG has made minor revisions to the language of mitigation measure BIO-10 in the Final IS/MND to clarify that the revegetation requirements of BIO-10 shall be documented in a revegetation plan as shown below:

BIO-10: SANDAG shall prepare a revegetation plan showing how all areas of temporary disturbance within sensitive habitat shall be revegetated with appropriate native species. Appropriate species include those that are (1) native, and (2) characteristic of the impacted type of vegetation community (e.g. southern riparian forest and southern willow scrub would be revegetated with willows and other native riparian vegetation; mule fat scrub would be revegetated with mule fat and other species associated with this community; freshwater marsh would be revegetated with cattail and/or bulrush or other native marsh species; buckwheat and baccharis scrub would be revegetated with coastal sage scrub-associated species; and non-native grassland would be revegetated with native grasses and forbs). The goal of the revegetation plan shall be to meet or exceed pre-project conditions.

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C-20

The proposed project would impact non-native grassland (NNG). NNG provides regionally important foraging habitat for raptors by supporting raptor prey species. Primarily due to development, raptor foraging areas are rapidly disappearing throughout San Diego County. Cumulatively, raptor foraging habitat loss may be significant, and impacts to this resource warrant mitigation. Therefore, the Department recommends that any project-related impacts to habitat designated as or potentially functioning as non-native grassland be mitigated.

C-21

BIO-4, BIO-5, Table 4, Table 5, and Table 6: While the draft MND states that "...mitigation ratios presented below are subject to approval by the resources agencies" (SANDAG, 2017; p. 3.7) the proposed mitigation ratios strongly emulate the City of San Diego's NCCP ratios. The City of San Diego negotiated their SAP mitigation ratios based on their contributions to the MHPA (preserve) and a comprehensive development and mitigation strategy. The draft MND should not assume that the City of San Diego's mitigation ratios would be sufficient mitigation for the proposed project.

C-22

BIO-8: A definition for a qualified biologist should be included as a component of mitigation measure BIO-8. Mitigation measure BIO-12 defines a qualified biologist as having "...at a minimum, a bachelor's degree in biology, ecology, zoology, or a related field of science, and at least two years of experience conducting biological surveys, including for nesting surveys" (SANDAG, 2017; p.45) could be adapted for use in mitigation BIO-8. It should be noted that for mitigation measures BIO-8 and BIO-12, the Department and U.S. Fish and Wildlife Service has distinct qualifications for surveying for CESA- and ESA-listed species.

C-23

We appreciate the opportunity to comment on the referenced draft MND. The Department requests an opportunity to review and comment on any response that SANDAG has to our comments and to receive notification of the forthcoming hearing date for the project (CEQA Guidelines; §15073(e)). Questions regarding this letter and further coordination on these issues should be directed to Eric Weiss at (858) 467-4289 or eric.weiss@wildlife.ca.gov.

Sincerely,



Gail K. Sevrems
 Environmental Program Manager

ec: Scott Morgan (State Clearinghouse)
 Patrick Gower, U.S. Fish and Wildlife Service, Carlsbad

REFERENCES

Bosakowski, Thomas, Dwight G. Smith, and Robert Speiser. 1992. Nest Sites and Habitat-selected by Cooper's Hawks, *Accipiter cooperii*, in Northern New Jersey and Southeastern New York. *Canadian Field-Naturalist*, Vol. 106, no. 4, Pages 474-479.

California Department of Fish and Wildlife, Natural Diversity Database. April 2017. Special Animals List. Periodic publication.

Knight, Richard L., and Susan Skagen. 1988. Effects of Recreational Disturbance on Birds of Prey: A Review. Pages 355-359 in R.L. Glinski *et al.*, eds. Proceedings of the Southwestern Raptor Management Symposium and Workshop. National Wildlife Federation, Washington, D.C.

Miller, Scott G., Richard L. Knight, and Clinton K. Miller. 2001. Wildlife Responses to Pedestrians and Dogs. *Wildlife Society Bulletin*, Vol. 29, no. 1, Pages 124-132.

C-20

As discussed in Section 7.4(b) of the Final IS/MND, the project would result in direct permanent impacts to approximately 0.01 acre and direct temporary impacts to approximately 0.05 acre of non-native grassland (see Table 3 on page 36) at the east end of the project adjacent to the existing Carlton Hills Boulevard bridge. Temporary impacts to 0.05 acre of non-native grassland would be revegetated with native grasses and fobs. Because the non-native grassland within the biological study area occurs in small, scattered and isolated patches that do not provide regionally important foraging habitat for raptors, the permanent loss of 0.01 acre of non-native grassland as a result of the proposed project would not have a significant impact to raptor foraging habitat. Therefore, no mitigation is required for the permanent loss of 0.01 acre of non-native grassland.

C-21

The Draft IS/MND does not assume that the City of San Diego's mitigation ratios would be sufficient mitigation for the proposed project as asserted by this comment; it identifies these mitigation ratios as the minimum needed to offset the project's impacts. As CDFW notes in its comment, SANDAG expressly acknowledged in the Draft IS/MND that mitigation ratios identified therein are subject to approval by the resource agencies.

C-22

SANDAG agrees with this comment and has revised mitigation measure BIO-8 as follows to include CDFW's recommended definition of a qualified biologist:

BIO-8: A qualified project biologist shall be responsible for overseeing compliance with all laws, regulations, permit conditions, mitigation measures, and any other biological resources requirements during project construction. Prior to the start of construction, a qualified biologist shall conduct environmental awareness training for all construction personnel. Topics to be included in the training include, but are not limited to, the construction limits, sensitive habitats, features, plants, and animal species to avoid, mitigation measure and/or permit condition requirements, seasonal or other time-related restrictions on construction, and measures related to erosion control and spill prevention. The qualified biologist shall have, at a minimum, a bachelor's degree in biology, ecology, zoology, or a related field of science, and at least two years of field experience.

C-23

In accordance with this request, SANDAG has provided CDFW with the Final IS/MND, including the responses to comments and notification of the meeting during which the SANDAG Transportation Committee will consider whether to adopt the Final IS/MND.



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SUBJECT: Mitigated Negative Declaration (MND) for the San Diego River Trail: Carlton Oaks Golf Course Segment

Dear Mr. Martin:

The City of Santee submits this comment letter regarding the draft Mitigated Negative Declaration in connection with the construction of an approximate two-mile long segment of the planned San Diego River Trail that would cross the jurisdictional boundary of the cities of San Diego and Santee through the Carlton Oaks golf course. The project proposes the reconstruction of the berm that runs along the north side of the San Diego River, and to utilize an existing trail through a park in Santee to support a multi-purpose trail for public use. As proposed, the trail would be 10 feet in width, consisting of a paved surface, with 2-foot wide pervious shoulders for a combined width of 14 feet. Lighting is proposed.

Three alternative designs are proposed for the connection of the trail to West Hills Parkway, only one of which suggests that a new traffic signal would be installed and a crosswalk painted on West Hills Parkway to direct users to the other side. From there cyclists would ride south within an existing bike lane. The other two designs propose connections near the existing intersection. Understandably the MND concludes that the project would improve the performance of the circulation system and contribute to reduced vehicular miles traveled by providing an alternative to vehicle commuting. At the same time, the project must not worsen congestion already experienced on the city's local streets, nor adversely affect the quality of life of residents who live near the intersection.

The City of Santee participated in the development of the San Diego River Park Plan, and supports the overarching goal of a trail from the headwaters to the coast. The Plan recognizes that the golf course site is a critical location for connecting the City of San Diego segment of the San Diego River Park with the City of Santee and upstream

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D-1 This comment provides introductory statements and summarizes the project description contained in the Draft IS/MND. No further response is required.

D-2 The modifications to West Hills Parkway under each of the West Hills Parkway connection options, including installation of a new pedestrian crossing with a pedestrian-activated signal under the Switchback Ramp option, would not result in significant traffic impacts on West Hills Parkway or other local streets in the City of Santee as explained below. Under the Curvilinear and Linear Ramp options, pedestrians and bicyclists would cross West Hills Parkway at the existing intersection with Carlton Oaks Drive, using the same green phase as vehicular traffic on Carlton Oaks Drive, without requiring changes to the existing signal phasing at this intersection. Therefore, the Curvilinear Ramp and Linear Ramp options would not result in significant traffic impacts at this intersection.

The Switchback Ramp Option would include installation of a new pedestrian crossing of West Hills Parkway with a pedestrian-activated signal located approximately 600 feet south of the Carlton Oaks Drive intersection. This pedestrian-activated signal would produce a red light requiring vehicles to stop only when a pedestrian or bicyclist activates the signal to cross the street. Otherwise this signal would not require

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D-2 cont. vehicles to stop when pedestrian and bicyclists are not present. Under this option this pedestrian-activated signal would be interconnected with the existing traffic signal at the Carlton Oaks Drive intersection and the timing of the two signals would be coordinated so that a pedestrian activated crossing would be timed with a red phase at Carlton Oaks Drive. Green phases would be timed to maintain continuous traffic through both signals. With this timing, vehicles traveling along West Hills Parkway would receive a red light at only one of these signals (not both) and for the same or similar amount of time as the existing red light phase at the Carlton Oaks Drive intersection. As a result, a new pedestrian crossing with a pedestrian-activated signal would not substantially increase vehicle delay for drivers along West Hills Parkway, meaning that the Switchback Ramp Option would not result in a significant traffic impact.

Moreover, the proposed project would not adversely affect the quality of life of residents who live near the intersection of West Hills Parkway and Carlton Oaks Drive or any other residents in the project area. As analyzed in detail in the Draft IS/MND, the proposed project would not result in any significant environmental impacts, including but not limited to no significant impacts related to lighting, air quality, noise, traffic, or community character. The project would, however, provide the City of Santee and its residents with a new multi-use bike and pedestrian path along the scenic San Diego River.

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segments of the river park. The Plan suggests that redesigning the golf course “to be more sensitive to the hydrology of the river and creating habitat corridors are ways in which the golf course may accommodate multiple user groups.”

As such, the MND must demonstrate that the new berm will not increase the potential for flooding nearby neighborhoods, that project implementation will not prejudice the city’s efforts to develop and implement a Multiple Species Conservation Plan, that changes to West Hills Parkway will not worsen traffic conditions nor negatively affect our adjacent residents, and not visually compromise the natural setting through which the bike route is proposed.

Visual Changes

Noted on page 21 of the MND, “The introduction of a hard surface trail where a soft surface trail currently exists would not create a notable visual change.” The City of Santee supports the concept of a consistent visual aspect, especially as integrated into the system of decomposed granite trails that currently exist. It is requested that SANDAG confirm the use of colored concrete for the hard trail system that is consistent with the color tones of the existing decomposed granite in the area. Additionally, the City proposes a brushed treated surface to more closely match a sand finish to further limit visual change to existing natural conditions. This would also allow for greater safety on the trail because where decomposed granite or sand meet hard surfaces, these areas tend to become slick for the biking public. A textured surface would reduce that potential.

Lighting

While the MND addresses a lighting design (pages 13, and 23) several citizens and City Councilmembers have expressed concern that the lighting improve public safety without creating adverse effects on the wildlife or human habitats. As stated in the MND, the final lighting design will be done in consultation with the resource agencies. The City requests that city staff be consulted through this process as well to better respond to citizen comments and concerns.

Hydrology

The Hydrology Study identifies that a portion of the project will be constructed on the existing berm within and adjacent to the Carlton Hills Golf Course. This berm was constructed in 1997, and maintained within the defined 100-year floodways of the San Diego River and Forester Creek. The berm was constructed as a levee to channelize the San Diego River away from where it would naturally flow. The levee is designed to provide protection to the golf course from 5 to 10 year storm events and in the event of a major storm, the levee is designed to give way and allow normal high flows to pass unrestricted across the golf course. Historically the levee has breached under various levels of storms.

D-3 This comment notes the City’s support for the San Diego River Park Plan, refers to redesigning the existing golf course, and raises flooding, the City’s unadopted Multiple Species Conservation Plan, traffic conditions, and visual resources as environmental issues that should be addressed in the Draft IS/MND. Responses to specific issues associated with these topics are provided in responses to comments D-2 and D-4 through D-25.

D-4 SANDAG appreciates this comment, and proposes that SANDAG and the City of Santee work together during final design to select color tones and surface textures that meet the needs of the City of Santee, resource agencies, the objectives of the regional bike program, and the project budget.

D-5 SANDAG included lighting in the proposed project in consultation with City of Santee staff. As stated in Section 2.0 of the Final IS/MND (page 13), lighting may be provided in select locations along the proposed project and would be shielded and directional to prevent spillover into adjacent areas, including sensitive habitat within the San Diego River and nearby residential properties. Section 7.1 of the Draft IS/MND demonstrates that the proposed project lighting would not generate a substantial amount of light that would adversely affect nighttime views in the project area. Section 7.4 of the Draft IS/MND demonstrates that the proposed project lighting would not have a substantial adverse effect on any sensitive species or habitats or other biological resources. As requested, SANDAG will continue to coordinate with City of Santee staff in regards to the specifics of project lighting and lighting design.

D-6 Contrary to the assertions in this comment, Section 7.9(c) and (d) of the Draft IS/MND does include an analysis of the proposed project’s effects on the hydrology of the project area, and the analysis does take into account all aspects of the proposed design of the project, including the proposal to expand and reinforce the existing berm in order to support the multi-use path and the placement of approximately 10,000 cubic

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- D-6 cont. The project MND has not identified the project scope or mitigation measures as to how the project will address the impacts of a permanent levee and additional fill within the floodways of the San Diego River and Forester Creek. Also, the project does not indicate how the project scope and permitting will meet the City of Santee's Municipal code requirements, specifically Flood Damage Prevention (Chapter 15.52), Drainage and Watercourses (Chapter 15.54), and Excavation and Grading (Chapter 15.58).
- D-7 Golf Course Segment – Project scope identifies that the existing berm will be improved by expanding, rebuilding, and/or reinforcing areas to support the proposed bike path and slope protection or similar measures to control erosion. This is counter to the nature of the existing levee that was built as a measure for minor storm protection. This permanent project element will need to be analyzed within the project hydraulic study/HEC/RAS analyses to determine the effects on the San Diego River and Forester Creek floodways. The study will need to show the location of the proposed permanent structure in the existing and proposed cross sections (MND, page 9).
- D-8 Retaining Walls –various retaining walls have been identified to be constructed as part of the trail. The wall locations will need to be analyzed within the project hydraulic study to determine the effects on the San Diego River and Forester Creek floodways (MND, page 12).
- D-9 Lighting – light fixtures and lighting facilities will need to be designed to meet the City's Flood Damage prevention requirements (MND, page 13).
- D-10 Project description includes placement of 12,000 CY of fill within the Floodways. The fill and grading work will need to be analyzed within the project hydraulic study to determine the effects on the San Diego River and Forester Creek floodways (MND, page 13).
- D-11 MND Section 7-9 Hydrology and Water Quality, Table items c. and d require disclosure on the alteration of drainage patterns and potential flooding. The "Less than Significant Impact" determination must be supported more clearly in the record. The hydrology analysis should identify that the project will alter the existing drainage pattern and stream course due to the reinforcing and expanding of the levee that is proposed as the scope of work of the project. (MND, pages 62 and 63). Table item h. - The levee is considered a structure and the appropriately analyzed to support the determination of "Less than Significant Impact." (MND, pages 62 and 63).
- D-12 Items c. and d, found on page 65, should be revised to reflect the nature of the improvements to the levee.
- D-13 The MND states that there are no dams immediately upstream of the project. This should be revised to reflect that the project is located downstream of three major dams and is also located within the limits of inundation related to dam failure of the Chet Harrit

- D-6 cont. yards (CY) of fill (net) and the construction of retaining walls within the project area. The analysis is based on hydrologic modeling prepared for the proposed project and included in Appendix J to the Draft IS/MND.

The analysis concludes that the proposed project would not substantially alter the existing drainage pattern of the project area, including the San Diego River, in a manner that would result in substantial on- or off-site erosion, siltation, or flooding. Therefore, there is no need for any mitigation measures. This conclusion is based on the flood hydraulic analysis study that was prepared as part of the Hydrology Study, which evaluated the proposed project's impact on the base floodplain. The analysis included in the Draft IS/MND was based on 100-year peak discharge flow rates from the Federal Emergency Management Agency (FEMA) (36,000 to 38,000 cubic feet per second [cfs]), and the analysis in the Final IS/MND was updated to use the recommended discharge flow rates in the City of Santee Municipal Code, Table 15.52.070(A) based on comments from the City (48,000 to 50,000 cfs). Both the draft and final analysis are based on the proposed design of the project, including changes to the existing berm and the placement of fill and the construction of retaining walls within the project area. The hydraulic analysis shows that the proposed project would result in a maximum increase in the 100-year water surface elevations of less than one foot (0.5 feet). This negligible increase in the 100-year water surface elevation would not result in substantial on- or off-site erosion, siltation, or flooding that would adversely affect any people or property. This negligible increase in the 100-year water surface elevation would require FEMA approval as described in Section 4.0 of the Final IS/MND.
- D-7 Please see response to comment D-6 explaining that all permanent project elements were analyzed in the hydraulic analysis included in the Draft IS/MND and the Hydrology Study in Appendix J. The improvements associated with the existing and proposed cross sections are included in the revised flood hydraulic analysis study.
- D-8 Please see response to comment D-6 explaining that retaining walls were included in the proposed project's hydraulic analysis.
- D-9 As stated in response D-5, SANDAG will coordinate with City of Santee staff in regards to the specifics of project lighting and lighting design.
- D-10 Please see response to comment D-6 explaining that placement of approximately 10,000 CY of fill (net) within the floodplain was included in the proposed project's hydraulic analysis.

D-11 Sections 7.9(c) and 7.9(d) of the Draft IS/MND did disclose that there would be some change to existing drainage patterns as a result of the project, but accurately concludes that the project would not substantially alter the overall existing drainage patterns. The project effects of increasing impervious areas, including the potential for substantial flooding to occur. As discussed in the analysis, the proposed project would increase the 100-year on site storm flow within the localized basins within the golf course by approximately 4.74 cubic feet per second (cfs) and by approximately 0.38 cfs east of the golf course. This change is negligible compared to the overall 100-year flow rate for the San Diego River of approximately 48,000 to 50,000 cfs and would not adversely affect the project area or downstream areas associated with substantial erosion, siltation, and/or flooding.

Section 7.9(h) of the Draft IS/MND has been revised in the Final IS/MND in response to this comment to address proposed project elements within the 100-year floodway of the San Diego River, including retaining walls the reinforced and expanded berm, and bridge or other similar structure crossing Sycamore Creek within the golf course. The impact conclusion of less than significant would not change as these proposed structures would not impede or redirect flood flows.

D-12 Please see response to comment D-6 explaining that the analysis in Section 7.9(c) and (d) of the Draft IS/MND does reflect the nature of the proposed improvements to the existing berm.

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D-13 cont. Dam, El Capitan Dam, and the San Vicente Dams. This hazard should be addressed within the project MND (MND, page 68).

D-14 The hydrology report prepared by Nasland Engineering references a study performed by BSI Consultants Inc., dated February 1990 and provides excerpts from the Study as Appendix C but the information provided has no relevance to the hydrology study provided.

D-15 The Hydraulics section beginning on page 5 identifies that small pipes will be installed for Basin D to carry the low flows associated with small storm events. These drainage improvements need to be addressed with the HEC-RAS study that accompanies the report. The HEC-RAS study does not identify how the flood waters will cross the berm nor utilize the proposed pipes.

D-16 Appendix D – the hydraulic analyses for San Diego River Trail Carlton Oaks Golf Course Segment, prepared by Chang Consultants dated January 27, 2017 requires that the engineer preparing the report to sign and seal the report. The report should specifically address the nature of the existing levee as discussed herein.

D-17 The report should also address the City of Santee's Flood Damage Prevention Ordinance (Section 15.52) that requires all development projects within areas of special flood hazards which increase flood heights and velocities to utilize a more conservative base flood discharge rate. The HEC-RAS study should be revised to include the analyses of the flow rates that are identified in Table 15.52.070(A) of the City's Municipal Code as part of the project MND.

D-18 The cross sections for the HEC-RAS study should clearly identify the existing levee and the proposed trail in the existing and proposed conditions. The study should include representative cross sections that clearly represent the levee and the proposed trail to reflect the water surface profile in the proximity of the trail since the trail height is greater than the water surface elevation as plotted.

Biology
D-19 The route proposes to utilize the existing Mast Park West trail, and to widen this trail to accommodate commuter and recreational users. The MND recognizes that a protective Conservation Easement affects Mast Park West which is held by the State of California. The MND concludes that implementation of biological mitigation measures will reduce impacts to a less than significant level. This conclusion is fully dependent on State concurrence and the processing of an easement amendment that would allow the widening of the "foot trail" to accommodate the objectives of the project.

D-20 The MND states that the city of Santee does not yet have its own adopted Multiple Species Conservation Plan (MSCP), and therefore a potential inconsistency with a non-

D-13 Section 7.9(i) of the Final IS/MND has been revised to disclose that the project site is located downstream of the dams identified in this comment (Chet Harritt Dam, El Capitan Dam, and San Vicente Dam) and within the dam inundation area associated with these three dams. As explained in the Final IS/MND, the proposed project would not expose people or structures to a significant risk of loss, injury, or death involving flooding as a result of failure of one of these dams.

D-14 The BSI Consultants Inc. Drainage Study dated February 1990 referenced in Appendix J of the Final IS/MND was included to document the source of calculated drainage flows which enter the project area from the north.

D-15 The HEC-RAS analysis contained within the hydraulic analysis included as part of Appendix J of the Final IS/MND analyzed project impacts associated with a 100-year flood event. The reference to small pipes for low flow discussed on page 5 of the Hydrology Study in Appendix J of the Final IS/MND has been revised to refer to an open bottom culvert. This drainage feature is for low-flow conveyance only and would be inundated during a 100-year storm event; therefore it is not addressed in the HEC-RAS analysis. Additional cross sections at the east end of the golf course have been added in the revised HEC-RAS study where the berm is more perpendicular to the river flow and indicate that the existing berm would be overtopped by a 100-year flood event. The project would widen, but not raise, the existing berm and therefore, the project would not alter the amount of flow that it would take to overtop the berm during a 100-year flood event.

D-16 The hydraulic analysis included as part of Appendix J of the Final IS/MND analyzed project impacts associated with a 100-year flood evaluates by evaluating the base 100-year flood and the proposed project's impact on the base floodplain. This analysis was updated utilizing the recommended discharge rates in the City of Santee Municipal Code and includes the existing berm and proposed fill within the floodway effectively widening the berm. As such, it considers the existing berm. The updated hydraulic analysis has been signed and stamped by the engineer who prepared the report.

D-17 Please see response to comment D-6 explaining that the hydraulic analysis was updated in response to this comment to utilize the base flood discharge rates included in City Municipal Code Table 15.52.070(A).

D-18 As requested, the hydraulic analysis included as part of Appendix J of the Final IS/MND has been updated to include additional cross sections at the east end of the golf course.

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D-19 SANDAG is the CEQA lead agency for the proposed project, and as such SANDAG is solely responsible for making environmental impact determinations in the Final IS/MND; the conclusions of the Final IS/MND are not “fully dependent on State concurrence.” This comment accurately describes the existing Mast Park West Conservation Easement held by CDFW, and SANDAG agrees that the proposed project would require an amendment to the existing Conservation Easement subject to the approval of CDFW and the City of Santee, and identified the need for an easement amendment in Section 4.0 of the Draft IS/MND. Section 4.0 also notes that the proposed project would require approved permits from CDFW prior to construction, including a Streambed Alteration Agreement. If the Final IS/MND is adopted, SANDAG would coordinate with CDFW and the City and other public agencies to obtain all needed approvals and permits required of the proposed project. Please also see response to comment C-2 explaining that the proposed project has been designed to utilize existing trails to avoid and minimize impacts to sensitive habitat and species within Mast Park West as much as is feasible.

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D-20 cont. [existing plan need not be analyzed. However, the Conservation Easement over Mast Park West establishes stewardship responsibilities and limits activities such that the 40-acre site is included in the city's draft MSCP preserve as a protected area. As such, the project must not prejudice the city's ability to adopt and implement its MSCP in the future. Financial endowment and long-term management by a land conservancy may be one way to successfully integrate the Project and habitat protection/conservation.

D-21 [The city has planned trails along the sides of the San Diego River since adoption of its own "Santee's San Diego River Park Plan" in 1984. An alternative route that avoids Mast Park West's trail along the river could be evaluated, such as a connection through private property with frontage on Carlton Oaks Drive. However, the Mast Park West trail would remain open to pedestrians and cyclists and most likely be favored by recreational and commuter cyclists as being a more direct route.

D-22 [**Circulation**
 Among the three trail designs enabling the connection to West Hills Parkway is the "switchback" design which includes a traffic signal and crosswalk roughly 550 feet south of the existing signalized intersection at Carlton Oaks Drive and West Hills Parkway. The signal may have an effect on vehicle flow during the morning peak hours when these streets are highly congested. Before and if this option is selected, the MND should include additional analysis regarding this new traffic signal in conjunction with the anticipated increase in pedestrian and bicycle volumes and disclose any impacts to West Hills Parkway and Carlton Oaks Drive. An analysis of signal timing is needed for all three options.

D-23 [The MND describes changes to West Hills Parkway and the intersection that raise questions about the possible need for additional public right-of-way to accommodate the wider sidewalk and to reposition traffic signal poles (pages 80 and 81). Specifically -
 "Under the Curvilinear Ramp Option, the following roadway modifications would occur: Construction of a 15-foot-wide sidewalk to replace the existing five-foot-wide sidewalk on the east side of the roadway between where the ramp would connect to the existing sidewalk and the southeast corner of the West Hills Parkway/Carlton Oaks Drive intersection."
 It is unclear as to whether the 15-foot wide sidewalk would require taking right-of-way at the corner property. This should be addressed.

D-24 ["Relocation of the existing traffic signal at the southeast corner of the West Hills Parkway/Carlton Oaks Drive intersection."
 It is unclear as to where this signal would be relocated, and how it may affect the north- and south-east corner properties. This should be addressed.

D-20 This comment is correct in stating that CEQA does not require an analysis of inconsistencies with unadopted plans. Regardless, SANDAG has been coordinating with the City in a multi-year process to develop the proposed project on behalf of the City of Santee, consistent with its adopted Bicycle Master Plan, and the City of Santee would ultimately be responsible the maintenance of the proposed project. As such, SANDAG proposes to continue this coordination during final design to develop a project that meets the City's needs as much as it feasibly can.

D-21 The proposed project was developed to provide a continuous Class I bikeway from the existing trail system in Mast Park to West Hills Parkway. The proposed project's alignment is consistent with river trail alignments identified in the San Diego River Conservancy's San Diego River Trail Gaps Analysis (2010), updated by SANDAG in 2014, the San Diego River Park Master Plan, and the City of Santee Bicycle Master Plan, all of which envisioned a river trail along the south edge of the Carlton Oaks Golf Course connecting directly to Mast Park. The proposed alignment was selected from numerous alternatives based on an evaluation of how well they met project goals, and on input from a public a public process that included participation by the City of Santee. In addition, the proposed project does not require the permanent acquisition of any private property.

The alternative route raised in this comment would be inconsistent with the City of Santee's own Bicycle Master Plan (among other local and regional plans) and inferior to the proposed project in several respects. For one, this alternative route would run right through the existing privately owned parking lot of an existing church; in order to implement this alternative route property would need to be permanently acquired from the private owner and used for the project. The property owner would permanently lose some of their existing parking spaces. Furthermore, diverting the trail through private property to Carlton Oaks Drive would not provide a continuous Class I bikeway as the route would have to utilize the existing on-road Class II bike lanes on Carlton Oaks Drive. It also would route the bikeway through the busy intersection of Carlton Oaks Drive and Carlton Hills Boulevard rather than providing a continuous Class I bikeway that would pass underneath Carlton Hills Boulevard into Mast Park. An alternative route through this private property to Carlton Oaks Drive was never raised as a potential alignment alternative in the 2015 alignment study.

D-22 Please see response to comment D-2 explaining that none of the proposed project's three West Hills Parkway connection options would result in significant traffic impacts.

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D-23 The proposed roadway modifications under any of the West Hills Parkway connection options would occur within the existing public roadway right-of way and would not require acquisition of private property. Sections 2.0 (page 11) and 7.16(a) in the Final IS/MND have been revised to clarify that roadway modifications would not require right-of-way acquisition.

D-24 Due to the widened sidewalk, the traffic signal would be relocated within public right-of-way slightly to the southwest at the same southeast corner of the West Hills Parkway/Carlton Oaks Boulevard intersection. No acquisition of private property would be required for this modification.

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D-25 [The MND should disclose the status of electric bicycles (e-bikes) with respect to use of the bike route. It is the city's understanding that e-bikes are restricted to roadways used by motorized vehicles. The MND should also address the potential impact to nearby parking lots in public parks and commercial centers along the river which could become staging areas for commuting cyclists.

D-26 [The City appreciates the opportunity to comment on the MND. If you have any questions, or need supporting information, you may reach me at (619) 258-4100, extension 167, or at mkush@cityofsanteeca.gov. For engineering questions, you may contact Scott Johnson and Minjie Mei at the same number.

Sincerely,



Melanie Kush
Director of Development Services

c. Marlene Best, City Manager
Bill Maertz, Community Services Director
Scott Johnson, Principal Civil Engineer
Minjie Mei, Principal Traffic Engineer

D-25 The project entails construction of a Class I bikeway, which is a shared-use path that is physically separated from motorized vehicular traffic. Under existing state law (AB 1096, 2015), electric bikes are segregated into three classes, two of which are permitted on Class I bikeways and one is prohibited. The law also permits local jurisdictions to restrict access of electric bikes by local ordinance. However, the legality and enforcement of the use of electric bikes on the proposed bike path is outside of the scope of CEQA.

The eastern end of the proposed project would terminate in Mast Park, where there are existing parking spaces for park users, including parking spaces for people interested in using the proposed project. There is also on-street public parking at the western end of the proposed project in the vicinity of West Hills Parkway and Carlton Oaks Drive. SANDAG understands that non-customer parking is already prohibited in commercial center parking lots in the vicinity of the proposed project.

It is not feasible to quantify the number and location of vehicle parking spaces that would be used by people to access the proposed project. Moreover, based on existing multi-use paths that SANDAG and other local jurisdictions have constructed elsewhere in the region, there is no evidence that construction of the proposed project would result in a major localized increase in vehicle parking demand that would exceed the available parking supply in the project area, and that the large increase in parking demand relative to supply would result in significant environmental effects, including but not limited to traffic, air quality, and noise impacts. SANDAG estimates that some users of the proposed project would park vehicles within the existing parking spaces in Mast Park, others might park in existing on-street public parking spaces, while others still would ride their bikes to access the proposed project. Since the proposed project would connect to existing trails within Mast Park, users are also anticipated to access the proposed project from this existing trail system.

D-26 These are concluding statements and no further response is required.

COMMENTS

RESPONSES

From: Courtney Mael [mailto:cmael@padre.org]
Sent: Friday, April 14, 2017 1:52 PM
To: Martin, Andrew
Cc: Gerry Canfield
Subject: San Diego River Trail - Carlton Oaks Golf Course Segment - Neg Dec.

Padre Dam has reviewed the proposed Initial Study / Mitigated Negative Declaration for the Carlton Oaks Golf Course Segment of the San Diego River Trail.

Please see our comments below.

- E-1 [
- 1) Padre Dam has an easement on private property owned by Vista del Verde homeowners association. This location is mentioned several times in the report as a potential access point for the work. Although Padre Dam does have an easement in this location, the rights of that easement can't be transferred by Padre Dam. Our easement is not exclusive however and the project would need to obtain a construction easement directly from the Vista del Verde homeowners association (HOA). Padre Dam facilities would need to be protected in place if the easement use is granted by the HOA.
- E-2 [
- 2) Padre Dam has facilities that cross the proposed trail in multiple locations. All Padre Dam facilities must be protected in place. Padre Dam will require review and sign off on all plans associated with the construction of the proposed trail. Some inspection may also be required during construction to ensure the protection of our facilities.
- E-3 [
- 3) Padre Dam has multiple existing easements onsite and certain aspects of the trail such as the proposed fence may require an encroachment permit. Padre Dam will work with the project manager and engineer of work on any item requiring an encroachment permit.
- E-4 [
- 4) The proposed trail is split between Padre Dam and City of San Diego. In order to serve construction water for the project from Padre Dam over the portions in the City of San Diego permission must be given from City of San Diego.
- E-5 [
- 5) No trees shall be allowed with in the Padre Dam easements. Landscape plans must be reviewed and approved by Padre Dam.

Thank you for the opportunity to comment on the proposed Neg. Dec.



Courtney Mael, PE
Engineering Manager
Development and Construction

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- > Cell (858) 610-6235
- > Fax (619) 449-9469
- > Web www.padredam.org

All email to and from Padre Dam may be considered public information and may be disclosed upon request.

- E-1 The Padre Dam easement is identified in the Draft IS/MND as a potential construction access route. If and when SANDAG decides to move forward with this route, it would first coordinate with the Vista del Verde homeowners association to inquire about the use of this easement and to obtain the necessary approvals (i.e., construction easement). SANDAG would also coordinate with Padre Dam regarding the protection in place of their facilities.
- E-2 SANDAG will coordinate with Padre Dam as the project progresses to final design, as well as during construction, for plan reviews and site inspections.
- E-3 SANDAG will coordinate with Padre Dam as the project progresses to final design regarding the potential need for an encroachment permit.
- E-4 SANDAG will coordinate with Padre Dam and the City of San Diego Public Utilities Department prior to project construction regarding use of water for construction activities.
- E-5 SANDAG will continue to coordinate with Padre Dam as the project progresses to final design for plan reviews, including landscape plans and tree location.

COMMENTS

RESPONSES



Preserve Wild Santee

April 8, 2017

Andrew Martin, Senior Regional Planner
SANDAG
401 B Street, Suite 800
San Diego, CA 92101
andrew.martin@sandag.org

RE: Draft MND for the SDRT - Carlton Oaks Golf Course Segment Project

Dear Mr. Martin,

- F-1 [The project as proposed has significant adverse impacts that are not considered in the Mitigated Negative Declaration. The project requires a full Environmental Impact Report that considers less damaging Alternatives.
- F-2 [The project should be scaled back to avoid significant adverse impacts as proposed in the "Decomposed Granite Alternative" portion of this letter.
- F-3 [The project proposes a 14' wide (10' paved) surface that is incompatible for the sensitive habitat adjacent to the San Diego River for the Carlton Oaks Segment. Thus, the trail contemplated becomes a non-motorized road with much greater impacts to endangered species, sensitive wildlife, aesthetics, trail use for wildlife observation purposes and serenity, increased potential for homeless occupation and associated adverse impacts. Amendment of the conservation easement for the "Mast Park West" portion to allow the project to be implemented is not appropriate. The project is also located within the MHPA where management directives state paving of trail is to be avoided.
- F-4 [None of the route is appropriate for installation of proposed "pedestrian-scaled" lighting. It is not sufficient to point lights away from San Diego River habitat, as the trail is an important portion of the habitat for nocturnal wildlife movement. The ongoing cumulative GHG impacts of lighting the trails are significant and have not been calculated or considered.
- F-5 [The construction itself is anticipated to last "approximately 12 months" and grade 12,000 cubic yards (10,000 cubic yards imported to the site). Importing fill would

- F-1 The comment makes a general statement that the proposed project results in significant adverse impacts that are not identified in the Draft IS/MND and requires preparation of an Environmental Impact Report; however, no facts or other evidence is provided to support this assertion. The conclusions and supporting analysis contained in the Draft IS/MND that the proposed project would not result in significant environmental effects are supported by substantial evidence contained in the record. Project impacts are adequately analyzed and assessed based on established CEQA significance thresholds. Where potentially significant impacts are identified, feasible mitigation measures are identified that would avoid or reduce impacts to below a level of significance.
- F-2 The comment states that the project should be modified to reflect the "Decomposed Granite Alternative" recommended in a later section of the letter in order to avoid significant environmental impacts of the proposed project. However, as explained in the response to comment F-1 and as demonstrated in the Draft IS/MND, the proposed project does not result in significant environmental impacts. This comment does not provide any support for the assertion that the proposed project has "significant adverse impacts." Responses to specific comments on the recommended Decomposed Granite Alternative are provided below in responses F-9 through F-11.
- F-3 Please also see response to comment C-2 explaining that the proposed project has been designed to utilize existing trails to avoid and minimize impacts to sensitive habitat and species within Mast Park West as much

F-3 as is feasible. The proposed project would also be located along an existing informal trail on top of an existing berm within the existing golf course in order to avoid impacts to sensitive habitat as much as feasible.
 cont.

SANDAG has designed the proposed project in this way in order to avoid adverse impacts to habitat and sensitive species within Mast Park West to the greatest extent feasible. Where there are potential direct and indirect significant impacts to biological resources within Mast Park West (such as at low-flow crossings near Carlton Hills Boulevard where drainage improvements are proposed and noise levels during construction) and elsewhere in the project area, the Draft IS/MND identified 12 feasible mitigation measures (BIO-1 through BIO-12) that would avoid these impacts or substantially lessen them to below a level of significance. As documented in the Draft IS/MND, implementation of mitigation measures BIO-1 through BIO-12 would ensure there are no significant impacts to sensitive species and habitats within Mast Park West and throughout the project area.

Please see responses to comments C-3 through C-5 explaining that the proposed project would be consistent with the conservation values of the Conservation Easement and the City of San Diego MHPA and MSCP Subarea Plan. The proposed project would not result in significant aesthetic impacts as shown by the analysis in Section 7.1.

The proposed project would generally be constructed along the alignments of existing trails where previous disturbance has occurred. The project proposes to incorporate design treatments into the bike path surface such as use of earth-toned colors and textures during final design to further visually blend project elements with the existing visual environment. Additionally, the proposed project would help achieve the San Diego River Park Master Plan’s vision for the San Diego River by implementing a portion of the San Diego River Pathway that would capitalize on the river’s scenic qualities based on its juxtaposition and orientation to the adjacent river. As discussed in Section 7.1(a) of the Final IS/MND, implementation of the proposed project would provide people the opportunity to bike and walk along the San Diego River and experience its scenery.

With respect to homeless occupation, the proposed project would be constructed along the alignment of an existing trail where previous disturbance has occurred and existing evidence of homeless occupation is already present. The project would not provide access to previously inaccessible areas such that it would induce increased homeless occupation. The assertion that the project would increase the potential for homeless occupation is speculative and CEQA does not require evaluation of such speculative effects pursuant to CEQA Guidelines Section 15145.

- | | |
|--------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| F-3
cont. | <p>As discussed in Section 7.4(f) of the Final IS/MND, Public Access, Trails, and Recreation General Management Directive 3 recommends to, in general, avoid paving trails <i>unless management and monitoring evidence shows otherwise</i>. The project proposes to pave the bike path with a 10-foot-wide all-weather surface and two-foot-wide pervious shoulders to provide a Class I multi-use bike path, as well as a durable long term facility to protect against further erosion of the existing berm while minimizing environmental effects. An all-weather surface is essential to ensure the bike path can fulfill its transportation function for all users under most all weather conditions. This is especially important for people on bikes with different levels of abilities who ride a wide variety of bicycle types, including those with tires requiring a paved surface. A paved surface also prevents erosion, reducing the need for maintenance activity that would disrupt operation of the facility. A paved bike path in this location, where an existing informal dirt trail occurs, would not adversely affect the functions and values of the biological resources within the Multi-Habitat Planning Area (MHPA) as analyzed in detail in Section 7.4(f) of the Draft IS/MND. For example, the introduction of a paved bike path would not threaten the viability of the sensitive bird species observed within the MHPA and San Diego River corridor. Mitigation was identified in the Draft IS/MND and MMRP (Appendix M) to protect sensitive species observed within the project area during vegetation clearing and grading, as well from construction noise during the avian breeding season (mitigation measures BIO-1 and BIO-3). Mitigation is also identified for impacts to USFWS-designated critical habitat for least Bell’s vireo and riparian habitat suitable for sensitive species breeding and/or roosting (mitigation measures BIO-2, BIO-4, and BIO-11). Thus, the proposed project would not conflict with the MSCP Subarea Plan management directive regarding paved trails.</p> |
| F-4 | <p>As analyzed in Section 7.4(d) of the Draft IS/MND, proposed project lighting would not interfere substantially with wildlife movement. The San Diego River functions as a wildlife movement corridor, and by focusing lighting away from the corridor, the proposed project would not substantially interfere with wildlife movement within the corridor. Please see response to comment F-12 addressing the emission of greenhouse gases related to project lighting.</p> |
| F-5 | <p>The project’s importing of fill material was included in the Draft IS/MND analysis of GHG emissions. Section 7.7 of the Draft IS/MND concluded that the project would not result in significant GHG impacts. A minimal amount of GHG emissions would occur during project construction associated with activities such as off-road diesel equipment exhaust, and from worker and truck trips to and from the project site (including delivery of fill material to the construction site). Such emissions would be temporary and would not directly or indirectly have a significant impact on the environment and would not conflict with an applicable plan,</p> |

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F-5 cont. exacerbate the project’s GHG construction impacts. The trail project at this magnitude is transformed from a potential community asset with insignificant impacts into a community nightmare at a dollar cost of over \$7.4 million. Scaling down the project, in addition to avoiding significant impacts described above, may allow avoidance of impacts at one or more of the construction access points contemplated.

F-6 The trail, regardless of design, will require maintenance and management. Who will manage and maintain the trail and how will the required activities be funded? Paving the trail could create a “shopping-cart freeway” leading to damages to fencing and unauthorized camps that could increase fire starts. Increased police and regulative enforcement will be required. The impact to police demand has not been considered.

F-7 It should be noted that San Diego Police Department is overburdened now as they have not responded to any of my calls for service in the East Elliott Community Plan Area over the past 20 years with the exception of a single 911 emergency call. What law enforcement agencies will patrol and serve this trail area?

F-8 Increased homeless camps or other illegal camps will also increase the habitat damage and require trash removal efforts to prevent significant adverse impacts to water quality. How will litter along the trail be cleaned-up and controlled?

Decomposed Granite (DG) Alternative
A Decomposed Granite (DG) Trail Alternative can meet most or all of the project objectives and avoid the significant adverse impacts discussed above. A DG Trail Alternative should be adopted instead that reduces the width of the trail by 2’ to 4’ feet along most of the route. The trail should be consistent in design with the other 8’-10’ width DG trail and side trail within the City of Santee section of the San Diego River Park.

F-10 None of the river trail should be lighted and all of those funds should be directed toward modified access points along with funds saved by avoidance of paving.

Modified Access:
The cost savings associated with reducing the trail width and eliminating the pavement should be utilized to improve the access points. The access points should be modified to better link existing pedestrian and bicycle routes within Santee.

The parking lot that belongs to the Carlton Oaks Southern Baptist Church at 9225 Carlton Oaks Drive, Santee (just east of the Oaks Apartments) is an ideal access point because of the short distance to the bike routes on Carlton Oaks Drive and

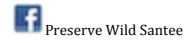
F-5 cont. policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases. An air quality and GHG emissions impact assessment was prepared for the project and included as Appendix B to the Draft IS/MND. This analysis quantified construction GHG emissions and was considered in the determination of the GHG impact conclusions. Construction GHG emissions were calculated to total approximately 810 metric tons per year, which is not considered substantial or at a magnitude that would contribute to a significant GHG impact as was explained in the Draft IS/MND.

The comment also refers to “scaling down” the project in order to avoid significant impacts; however, no significant impacts would occur as a result of the project, as concluded in the Draft IS/MND.

F-6 Upon the completion of proposed project construction, maintenance and management of the proposed project would be the responsibility of the cities of Santee and/or San Diego. Upon completion of construction, SANDAG would execute operating and maintenance agreements with the cities of San Diego and Santee. The cities would also be responsible for the funding of the maintenance and management activities that they accept responsibility for through the operating and maintenance agreements.

Under existing conditions, shopping carts and other physical evidence of a homeless population in the project area have been observed, and fence damage is evident on the existing DG trail in Mast Park West.

While it may be true that it is easier to push a shopping cart on a trail paved with an all-weather surface than it is to push a shopping cart on a DG surface, it does not automatically follow that the project’s proposal to provide an all-weather surface would lead to, “a ‘shopping-cart freeway’ that in turn would lead to damages to fencing and unauthorized camps that could increase fire starts.” For one, the project area, which does not include an existing paved trail, already includes shopping carts and other physical evidence (including fence damage) demonstrating the presence of homeless population along the river in the project area. In addition, the proposed project would provide permanent fencing along both sides of the proposed bikeway in places where such fencing is not present, thus impeding the ability of homeless (and other persons) from entering the river corridor. The project’s proposal to provide an all-weather surface for the bikeway would attract new bike and pedestrian users to the area and also facilitate safety patrols, which in turn could decrease the project area’s existing desirability to homeless persons. The provision of lighting could also decrease the project area’s existing desirability to homeless persons.



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- F-6 cont. The assertion that the project would increase the potential for homeless occupation and resulting vandalism and property damage is speculative, and CEQA does not require evaluation of such speculative effects pursuant to CEQA Guidelines Section 15145. Project impacts to police protection services were analyzed in Section 7.14(a)(ii) of the Draft IS/MND. The analysis concludes that the proposed project would not increase the demand for police protection services to such an extent that new or physically altered governmental facilities would be required in order to maintain acceptable service ratios, response times, and other police performance objectives. The impact on police protection services is less than significant.
- F-7 Please see the response to comment F-6.
- F-8 Please see the response to comment F-6 addressing issues related to the presence of homeless persons in the project area. Please see the response to comment C-12 addressing trash management.
- F-9 This section of the San Diego River Trail is being developed as part of the regional bike network. As one of the major corridors in this network designated in the plan as a Class I bikeway facility, it is designed to the bikeway design standards in the California Highway Design Manual Chapter 1000, which calls for a ten foot wide all-weather paved surface with two 2-foot shoulders for a total width of 14 feet. A paved surface is essential to ensure the facility is accessible for all users under most normal weather conditions, including but not limited to people of all ages and abilities that are walking, biking, using wheelchairs, pushing strollers, and so on. An all-weather surface is also more efficient and economical to maintain.
- Please also see response to comment C-2 explaining that the proposed project has been designed to utilize existing trails to avoid and minimize impacts to sensitive habitat and species within Mast Park West as much as is feasible.
- F-10 This comment will be provided to the SANDAG Transportation Committee for its consideration before it considers whether to adopt the Final IS/MND. This comment does not raise any environmental issues that CEQA requires be addressed in the Final IS/MND.
- F-11 Please see the response to comment D-21 explaining the reasons why the proposed project is superior to the alignment raised in this comment that would travel through the existing church parking lot, including the fact that the proposed project provides direct access to existing bike and pedestrian routes. This comment also asserts that an alignment that cuts through existing church property would avoid impacts to

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Fanita Parkway that connect with Santee Lakes. Creating this access point could create a safe route with minimal exposure to motorized vehicles all the way to Santee Town Center, thus actually removing vehicle trips from local roads in Santee. The connection to the existing river trail is also nearly immediate. Thus a connection from the San Diego River Trail north along the Stow Trail through Sycamore Canyon could link to the Trans-County Trail at Goodan Ranch/Sycamore Canyon Open Space Preserve. This potential access point represents a significant regional and local circulation improvement for non-motorized travel with very little exposure to higher-speed motorized routes.

F-11 cont. Mast Park West, but that is not correct. The northern boundary of the Mast Park West Conservation Easement is immediately adjacent to the church property. As a result, it is not possible to access the church property – either permanently with a bikeway or temporarily for construction access – without going through Mast Park West. This comment also asserts that the church’s parking lot would become parking for users of the commenter’s recommended alignment, which would result in further loss of the church’s private property and parking spaces in addition to property and parking spaces the church would lose in order to provide this commenter’s recommended alignment. Moreover, the proposed project does not include any new parking spaces at Mast Park

F-11 cont.



Potential access point to the San Diego River Trail from the COSB Church parking lot

Inquiry should be made with the church for an easement in exchange for improving the facilities entire parking lot. Since the lot is under-utilized during certain hours and days of the week, inquiry should be made to see if the Church would consider sale or lease of the western portion of the lot for joint use under specified hours. If the Church is agreeable, the shared lot would also relieve the overflow parking demand for Mast Park during the busiest times (Saturday morning).

The construction access and trail at the Calle Del Verde complex would thus be eliminated. This would eliminate the associated habitat, noise, and other construction related impacts at Calle Verde parking lot. Since the distance from Calle Del Verde parking lot to the existing river trail is much farther than the distance from the Church parking lot to the existing river trail, overall habitat / species impacts would be reduced by adopting the Church lot access point.

F-11
cont.

Utilization of the church lot would also eliminate the need to disturb the existing trail west of the Mast Park/Carlton Hills Boulevard Bridge – offering another significant savings. This would eliminate the need to dredge under the bridge for construction equipment access.

Additional parking at the church lot would also moot the proposal by the City of Santee to convert river bottom parkland at Mast Park into parking lot. The significant adverse impacts of the parking lot proposal by the “Mast Park Improvement Project” can and should be avoided by considering both of these proposals together rather than segmenting them into separate projects that would inappropriately presume the potential significant adverse impacts are not related.

Other funds saved by a constructing a reduced width DG trail should go toward designing an access point on West Hills Parkway that avoids or reduces impacts to traffic on that road, which already suffers from gridlock during commute hours.

F-12

Cumulatively Significant Greenhouse Gas (GHG) Impacts

The MND estimates the project’s GHG impacts to be 810 MTCO2E. Climate impacts are now so severe and beyond control that any GHG emission not offset is significant. The margin of error means that project emissions may exceed the arbitrary 900 MTCO2E significance threshold for GHGs. This project includes operations in Mast Park, yet artificially separates itself from the “Mast Park Improvement Project” for considering GHG and other significant impacts. The “Mast Park Improvement Project” estimates another 841 MTCO2E. Together, these projects in the same area are nearly double the arbitrary 900 MT threshold. The projects cannot be segmented. Avoidance and mitigation measures for unavoidable impacts are required.

Thank you for considering these comments.



Van K. Collinsworth
Geographer / Director, Preserve Wild Santee

F-12 The comment asserts that any quantity of GHG emissions that is “not offset is significant,” but this is not the standard for determining whether an impact is significant under CEQA. This comment further asserts that the proposed project’s GHG emissions would exceed the “arbitrary 900 MT threshold” but the Draft IS/MND did not use 900 metric tons of GHG emissions as a threshold to determine whether the project’s GHG emissions are significant. The Draft IS/MND used the following two criteria to determine whether the proposed project would result in significant GHG emissions impacts, based on Appendix G to the CEQA Guidelines:

- “Would the project generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment?” and
- “Would the project conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?”

Section 7.7 of the IS/MND analyzes the proposed project under these criteria and concludes that the project would not result in significant GHG impacts. This conclusion is based, in part, on estimated construction GHG emissions calculated for project construction activities, as reported in Appendix B to the Final IS/MND. As referenced in the comment, construction GHG emissions were calculated to total approximately 810 metric tons per year. However, this estimated amount was not compared to a 900 annual metric ton threshold as asserted by this comment.

This comment also asserts that the proposed project and the Mast Park Improvement Project “cannot be segmented,” but in fact the proposed project and the City of Santee’s Mast Park Improvement Project are completely independent of each other, and the utility of the proposed

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F-12 project is in no way dependent on the completion of the Mast Park
cont. Improvement Project, and vice versa. Therefore, it is not logical or
accurate to consider these two separate projects as one single project
under CEQA. No GHG mitigation measures are required because the
proposed project would not result in significant GHG impacts. The
proposed project is intended to support GHG reductions by promoting
biking and walking as viable alternatives to driving.



March 21, 2017

Andrew Martin
SANDAG
401 B Street, Suite 800
San Diego, CA 92101

**RE: San Diego River Trail - Carlton Oaks Golf Course Segment Project Public Review
Draft Initial Study/Mitigated Negative Declaration**

Save Mission Trails is a nonprofit organization dedicated to protecting the environment and quality of life for communities surrounding Mission Trails Regional Park. SMT members have reviewed the draft MND. We look forward to the completion of the River Trail and the ability to walk or bike from Mission Trails to Mast Park without needing to use the street.

SMT opposes the construction of a concrete or asphalt surface for the trail. A wide hard surface creates a racetrack in the middle of a natural habitat. It invites skateboarders, road cyclists (speed cyclists), and even homeless shopping carts. It is costly. It does not blend in with the surrounding environment.

SMT requests either the use of decomposed granite for the river trail surface, which will better fit into the environment than concrete, OR keeping it a natural, dirt trail - with improvements. The latter is better for joggers and birders and those who appreciate the natural aesthetic of the riparian valley.

Again, it is not a racetrack, and it is not an urban area. This segment borders a natural habitat with abundant riparian birdlife (including Least Bell's Vireos). This area is a favorite for people who are strolling, observing nature, and for leisurely bike riders. Therefore, a 10-foot wide concrete sidewalk is wrong for this location.

Thank you for your attention to our concerns.

Sincerely,
SMT Board Members

Stephen Houlahan *Sandy Kuntz* *Mia Volker*
Stephen Houlahan Sandy Kuntz Mia Volker

Patricia Murphy *Jeff Kahn*
Patricia Murphy Jeff Kahn

8824 Annandale Way
Santee, CA 92071

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are tax-deductible

savemissiontrails@gmail.com

G-1

G-2

G-3

G-4

G-1 This comment provides introductory statements and no further response is required.

G-2 The proposed project would be designed to blend into the existing setting with a paved surface colored match existing soil to the extent feasible. A paved all-weather surface is proposed in order to provide a stable surface under the normal variations in weather, as well as to reduce the maintenance burden for the cities of Santee and San Diego. It also facilitates patrolling for unwanted behavior. The project would not be located “in the middle of natural habitat” but along existing formal trails within Mast Park West and generally along an existing informal trail within an existing golf course. Please see the response to comment F-6 addressing the issues of homeless persons and shopping carts. This comment in opposition to concrete and asphalt surfaces for the proposed project will be forwarded to the SANDAG Transportation Committee for its consideration before it considers whether to adopt the Final IS/MND.

An all-weather paved surface, as opposed to decomposed granite, is proposed as part of the project to provide a safe, usable surface for all users under most all weather conditions. This is especially important for people on bikes who ride a wide variety of bicycle types, including those with tires requiring a paved surface. A paved surface also prevents erosion, reducing the need for maintenance activity.

G-3 This comment expressing preference for decomposed granite or “natural, dirt” surface in lieu of an all-weather surface will be forwarded to the SANDAG Transportation Committee for its consideration before it considers whether to adopt the Final IS/MND.

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G-4 This comment summarizes Save Mission Trails' opposition to a paved all-weather surface. Responses to the environmental issues raised in the comment letter are provided in responses to comments G-2 and G-3.

COMMENTS

RESPONSES

April 13, 2017

Andrew Martin, Senior Regional Planner

SANDAG
401 "B" Street, Suite #800
San Diego, CA 92101

via email: andrew.martin@sandag.org

Re: S.D. River Trail: Carlton Oaks Golf Course Segment Project

Dear Mr. Martin,

Having read through the 90-page plus MND document and reviewed a couple of the appendices, I would like to bring to your attention a number of areas of impact on the *human* aspects of this project – one that never seems to be referenced or addressed in any of the previous or most recent SANDAG studies. One would think that SANDAG does not even believe that the people living in close proximity to this project will be impacted at all since the focus and slant of every single study has been completely and primarily on the ecological (flora and fauna) impact.

On the following pages, I have listed some examples of the very direct impact and personal concerns of mine. I have referenced the MND pages and sections where applicable and have commented on statements that I feel are blatantly false and/or that contradict statements in other sections of the MND; *my thoughts/concerns and/or questions are italicized*. [Note: **WHP** = West Hills Parkway; **COD** = Carlton Oaks Drive]

1) Potential future improvements (deck) on my property – will I be impacted/restricted (per Santee building code) because (Option 3 – Linear Ramp) the sidewalk will now be right next to my property line? Will SANDAG have a surveyor locate & re-stake my property line on the slope? (This is the one that was buried when San Diego installed this newer section of the sidewalk and then poured fill dirt down the side of the slope some years back.) Will the widened 15' sidewalk extend north all the way to the WHP/COD corner or will it taper off; or, will the signal be moved and the lanes changed (this is unclear)? What about decreased property value? Access to/impact on the natural gas lines?

2) How will the view from my backyard looking out over this space change? **Who is responsible for any issues resulting from this project after it's completed – S.D., Santee, SANDAG?**

Section 7.10.b – conflicts w/land use plan, policy, regulation, general plan
What are the boundaries of S.D. River Park as noted in S.D. River Park Master Plan (City of SD 2013a)?

(Pg 80) "Measures of Effectiveness" for performance of circulation system – *this is per S.D.'s plans and manuals, ordinances, & policies; what about Santee's ordinances?*

(Pg 81) Level of Service (LOS) Metrics – *what are the referenced LOS A-D levels?*

3) **MITIGATION EFFORTS**
(Pg 1) – this plan yields "no significant impacts"; *if so, what is the mitigation for Option 3 (Linear Ramp)?*
Project Background (Pg 5) – **significantly** increase # of bicycles and frequency of bike trips (every day)
App A (Pg 16) – **more people have access to this area/neighborhood, 24/7**

H-1 This comment raising the concerns with "human aspects" of the proposed project will be forwarded to the SANDAG Transportation Committee for its consideration before it considers whether to adopt the Final IS/MND; however, it does not raise any environmental issues that are required to be addressed in CEQA. In addition, SANDAG does consider the people living in close proximity to the proposed project. For example, SANDAG selected the project alignment along the San Diego River on the south side of the golf course as opposed to an alignment along the north side of the golf course near residences in response to input from those residents and other considerations. The project does not affect the private property of any residents in the project area, and it does not adversely affect local traffic conditions in the project area. The project proposes lighting that would be designed to avoid adverse effects to nearby residences. In addition, the proposed project would provide local residents of all ages and abilities with a multi-use path for walking and biking along the scenic San Diego River.

H-2 The proposed project would not be located on Ms. Lowry's property; it would be located within existing public right-of-way. Ms. Lowry's property is separated from the existing sidewalk along West Hills Parkway by an approximately 8-foot-tall solid block wall. The proposed project would avoid the existing wall.

Under the Linear Ramp option, the existing sidewalk would be widened and it would extend to the southeast corner of the West Hills Parkway/ Carlton Oaks Drive intersection, which is adjacent to Ms. Lowry's property. The existing traffic signal at this corner would be relocated slightly to the southwest, but it would remain on the sidewalk where it is today and it would not affect Ms. Lowry's property. The additional width needed for the widened sidewalk would be located within the existing roadway, and the travel lanes on the east side of West Hills Parkway would be re-stripped to accommodate the space needed for the widened sidewalk, but West Hills Parkway will still have the same number of lanes as it does today. The proposed project would avoid the existing natural gas lines.

- H-3 Visual impacts were addressed in detail in Section 7.1 of the Draft IS/MND. As discussed, visual changes would include removal and replacement of up to approximately 100 trees along the existing berm. While this change would be noticeable, most of the existing trees within the golf course would remain, and most of the riparian vegetation within and along the San Diego River would not be disturbed. Replacement trees would be planted at a 1:1 ratio at various sizes to mimic the natural succession and variety of existing trees in the area. Other noticeable visual changes would include safety fencing along short sections of the bike in certain locations (anticipated near the fairways on holes 3, 4, 5, and 15). The fencing would up to 10 feet high and would incorporate colors and materials that match its surroundings and reduce its visibility. Trees and vegetation would also be planted where feasible in areas where the safety fencing is proposed to provide visual screening of the safety fencing. Retaining walls would be constructed in certain locations along the north side of bike path alignment and may be visible from certain vantage points, although given the distance across the golf course and intervening landscaping, these would not likely be highly visible from nearby residences. Retaining walls and other new project elements would also be visible near the west end of the project site near and along West Hills Parkway, but are consistent with the existing character of the western end of the project, which features views of West Hills Parkway and State Route 52. Overall, as concluded in Section 7.1(c) of the Draft IS/MND, project elements would be visually consistent with the surrounding environment. The City of San Diego and/or the City of Santee would be responsible for maintaining and operating the proposed project upon completion of construction.
- H-4 The boundaries of the San Diego River Park Master Plan encompass an approximately 17.5-mile-long section of the San Diego River corridor that extends 0.5 mile from each side of the river within the boundaries of the City of San Diego, from the Pacific Ocean in the community of Ocean Beach to the City of San Diego's limit at the City of Santee.
- H-5 The analysis of West Hills Parkway contained in Section 7.10(a) of the Draft IS/MND used City of San Diego standards because this roadway and its intersection with Carlton Oaks Drive are located within the City of San Diego. The proposed project would not have a significant impact on the performance of the circulation system.
- H-6 Level of service (LOS) is the professional industry standard term used to denote the different operating conditions that occur on a given roadway segment or intersection under various traffic volume loads and delay times. LOS is a qualitative measure used to describe a quantitative analysis taking into account factors such as roadway geometrics, signal phasing, speed, travel delay, freedom to maneuver, and safety. LOS

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H-6 cont. provides an index to the operational qualities of a roadway segment or an intersection and is defined on a scale of A to F. LOS A facilities are operating below their capacity with free-flowing traffic conditions with no restrictions on maneuvering and little or no delays. LOS F facilities are operating above their capacity and have highly unstable, congested conditions with long delays.

H-7 The West Hills Parkway connection options including the Linear Ramp option only affect the area on the west end of the proposed project where it would connect to the existing sidewalk on West Hills Parkway; the Draft IS/MND analyzed a single alignment for the remainder of the proposed project. Thus, unless otherwise noted, impacts resulting from the project apply to any of the West Hills Parkway connection options. There are minor differences in acreages of habitat and other biological resource impacts and corresponding mitigation among the options, as indicated in Section 7.4 (see Tables 3 through 9). Proposed mitigation measures for the project were identified in the Draft IS/MND and in the Mitigation, Monitoring, and Reporting Program (Appendix M).

The use of the term “significantly” in the goal of the Regional Bike Plan does not imply the same meaning as it does within the context of CEQA. In the Regional Bike Plan, “significantly” is synonymous with “large” or “meaningful” increase in bike trips, and is completely unrelated to the use of “significant” to describe environmental impacts under CEQA.

The comment states that with project implementation, more people would have 24-hour access to the project area; however, access to the area is already provided by the existing trails within Mast Park West and the informal trail along the berm adjacent to the golf course that are actively used by people. The project area also features an active golf course, and an existing sidewalk already provides access along West Hills Parkway.

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- H-8

Currently, there are maybe 20 people walking north or south on WHP on any given day. If the plan's goal is to "significantly increase the number of bicycles and bike trips every day", how can this be considered to have "no significant impact" on the neighborhood, traffic, and property values?
(**Connection to WHP Options**, Pg 11) – currently, pedestrians can only cross from SE corner to NE corner to W corner
– Switchback Ramp: install traffic signal & continental crosswalks @ **each** corner of COD/WHP
– Curvilinear Ramp: construct 15'-wide sidewalk (replaces existing sidewalk) from connecting bike ramp to SE corner of WHS/COD intersection; install curb ramps & continental crosswalks @ each corner (to move people/bikes to west (SB) side of WHP); relocate traffic signal @ SE corner of COD
- H-9

App A (Pg 12) Option 1: visible from roadway; requires reconfiguration of existing lanes
Options 2 & 3 – use existing bike lane

App A (Pg 15) Retaining Walls for option connectors – **WILL** create a noticeable contrast that will be visible to residents

Section 7.17.c – brow ditch near connection ramp and new storm water drains
How far along the sidewalk will this extend; what about any erosion to the slope?
- H-10

4) **VIEW**
Lighting (Pg 13) – (Pg 18, Table Item d.) how can a "new" light source = a less than significant impact?
(any light in an otherwise completely dark void = a significant change, e.g., Cowles Mtn. night hikers)
- H-11

(Pg 19) – project area is not highly visible from surrounding public vantage points – **FALSE**
Pedestrians walking along the sidewalk regularly like to look at the golf course view, wildlife, etc.
- H-12

Item C (Pg 20) re: degradation of existing visual character of the site/its surroundings
(Pg 23) "Project would not create a new source of substantial light adversely affecting nighttime views"
– **FALSE** *How can this be "less than significant"?* (Pg 24)
- H-13

App A (Pg 12, paragraph 2) All 3 options require 2:1 manufactured slopes up to 20' tall
Is this measured from below ground elevation? "grading activities WOULD create a visible change in the project area"
- H-14

App A (Pg 17) – "new lighting WILL be noticeable" ("*moderate*" level of visual contrast? existing "*character*" of area would be maintained?)
How can the character of the area be maintained when you go from a completely dark view at night to one that has multiple points of light spread over that space?
- H-15

5) **CONSTRUCTION** (Pg 13) – Access to WHP site
Section 5.0 Table (Pg 15) – why is Transportation/Traffic considered a "less than significant" or "no impact" effect of the project
Is SANDAG aware of the tremendous traffic snarl and congestion during morning rush hour throughout the week on WHP?
(Pg 72) – **ACCESS ROUTES** for construction vehicles - max speed of 25mph, periodically, throughout the day; @ WHP site, ~ 200' from closest residential receptor

- H-8

The Draft IS/MND analyzes the environmental impacts that would result from the construction and operation of the proposed project. The analysis demonstrates that people riding bikes would not result in adverse changes to the physical environment, including traffic impacts, which are analyzed in Section 7.16. The comment that more people riding on bikes in the project area will adversely affect "the neighborhood" and property values is outside the scope of an environmental analysis under CEQA, but this comment will be provided to the SANDAG Transportation Committee for its consideration before considering whether to adopt the Final IS/MND for the proposed project.
- H-9

The first part of this comment lists roadway modifications associated with certain West Hills Parkway connection options, but does not raise any environmental issues with the Draft IS/MND for the proposed project.

The comment also states that proposed retaining walls would be visible, which is consistent with the analysis contained in Section 7.1(c) in the Draft IS/MND. Section 7.1(c) explains that while retaining walls would be visible, they would include design features, such as use of natural colors and textures visually similar to existing walls and features within the golf course to visually blend them in with the existing visual environment to reduce the potential visual contrast created by the introduction of walls along the trail edge. Therefore, the Draft IS/MND concluded that the proposed retaining walls would not substantially degrade the existing visual character of the project area.

The brow ditch would not be constructed along the sidewalk, but adjacent to portions of the west side of the ramp under each of the West Hills Parkway connection options. Manufactured slopes constructed in this area under any of the West Hills Parkway connection options would be revegetated for erosion control.
- H-10

To evaluate the impacts of the proposed project lighting the Draft IS/MND examined whether the project would create a new source of substantial light that would adversely affect daytime or nighttime views. The proposed project lighting would be designed to illuminate the proposed multi-use path and to not allow light to spillover into adjacent areas. As discussed in Section 7.1(d), project lighting would comply with applicable lighting regulations, such as applicable sections of the San Diego Municipal Code and Santee Municipal Code, and it would follow the design guidelines contained in the San Diego River Park Master Plan. These regulations stipulate, among other things, the types, illumination, heights, and other features of outdoor lighting to minimize light spillover. Moreover, while the project site occurs along the San Diego River, it is also located adjacent to developed areas that include existing light sources, such as street lights, residential lighting, and lighting within commercial areas. There are existing street lights at

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- H-10 cont. the intersection of West Hills Parkway and Carlton Oaks Drive and along State Route 52. There are also trees located between the proposed project and existing residences that would partially or fully block views of the proposed project. Thus, the Draft IS/MND concluded that the addition of pedestrian-scale lighting placed periodically along select locations of the proposed project would not constitute a new source of substantial light that would adversely affect day or nighttime views in the area. The impact is less than significant.
- H-11 The comment slightly misquotes text from the visual analysis contained in Section 7.1(a) of the Draft IS/MND. The visual analysis (page 19) states that the “*proposed project would occur in an area* that is not highly visible from surrounding public vantage points,” while the comment misquotes the Draft IS/MND as saying that “*the project area* is not highly visible from surrounding public vantage points.” SANDAG apologizes for any confusion caused by this statement. The focus of the visual analysis is on the visibility of the proposed project from surrounding public areas. So, while views of the *general project area* are provided from some public vantage points, such as from portions of West Hills Parkway, the *proposed project itself* would be located along south edge of the golf course and within the interior of Mast Park West where much of it would not be highly visible from surrounding public roadways or other public vantage points because of the intervening trees and vegetation and the sizable differences in elevation among the proposed project and public vantage points in the area.
- H-12 Please see the response to comment H-10 explaining how the proposed project lighting was analyzed in the Draft IS/MND.
- H-13 The height of the manufactured slopes accounts for the vertical difference in ground elevation between the toe (bottom) and the top of the slope. Consistent with the comment, Section 7.1(c) of the Draft IS/MND (page 23) acknowledged that grading activities associated with the West Hills Parkway connection options would create a visible change in the project area. The analysis further explains that while the change would be visible, it would not substantially degrade the existing visual character of the area because the project would incorporate color tones, materials, and vegetation that reflect the existing visual environment.
- H-14 Please see the response to comment H-10 explaining how the proposed project lighting was analyzed in the Draft IS/MND.

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H-15 The project would not generate traffic trips along surrounding local roadways that would exacerbate existing traffic conditions. As discussed in Section 7.16(a) of the Draft IS/MND, the proposed project would improve the performance of the circulation system by giving more people the option to bike or walk instead of drive. Please see response to comment D-2 explaining why adding a new pedestrian crossing with a pedestrian-activated signal under the Linear Ramp option would not result in significant traffic impacts.

The comment also includes information contained in Section 7.12(a) of the Draft IS/MND about the proximity of residences to identified construction access routes, but does not but does not raise any environmental issues with the analysis of the Final IS/MND.

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H-16 6) **RETAINING WALLS** (Pg 22) proposed 1'-7' tall seen only by golfers – **FALSE**
How long for replacement trees & shrubs to grow to maturity to block view of bike trail from homes & sidewalk?

H-17 7) **NOISE** (Pg 71)
 (Santee) no Sundays or holidays; no more than 8 hrs in a 24-hr period
 (Pg 73) 65dBA @ property line of residential use
 (S.D.) no Sundays or holidays; none allowed from 7P-7A
 (Pg 72) less than 75dBA over 8- or 12-hr period

Section 7.12.d (Pg 74) “No substantial or periodic increase in ambient noise levels” – **FALSE**

H-18 8) **FIRE/POLICE SERVICES** (Pg 77) – *what is projected increase in calls for injured hikers/cyclists? Which city’s emergency services will respond?*
 Traffic control plan during construction – *keep access open for emergency vehicles, only?*

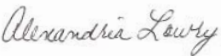
H-19 9) **No HAZARDS** (Pg 82) – **FALSE**
What about bikes exiting the bike path? Where does the access to the bike lane start? Will bikes be on the sidewalk all the way from the access point north to the COD intersection? Will there be guard rails on both sides of the “new” sidewalk?
 Section 7.16.f (Pg 83) – no impact?
Does the separated path from the roadway have pedestrians and cyclists sharing the same space?

H-20 10) **RECREATION** – Section 7.15.a (Pg 78) – *any consideration for the substantial physical deterioration of existing neighborhood or property due to increased travel into area?*
 Section 7.17.f (Pg 85) “solid waste disposal” – *what about trash/litter from bike path users; will trash cans be provided along the path?*

I understand that this project is moving forward no matter what. I am not against a hiking trail/bike path. I am, however, simply requesting some modicum of consideration for the significant impact to the human element as a result of this project. Namely, I would greatly appreciate a decision to go with either Option 1 or 2 for the bike path connection to West Hills Parkway. Option 3 (Linear Ramp), which connects the bike path right at the base of my property, would **significantly** change and **negatively impact** my lifestyle by negating the numerous reasons for purchasing my home on this specific site some 24 years ago.

H-21 With green space all around us, never in a million years did I ever imagine that there might be a trailhead at the base of my property near the golf course when all that I ever expected to look out and see was a nice, calm, soothing view of the golf course with its slightly rugged landscape and the various wildlife that inhabit this area. I would like to preserve my existing view and mitigate the impact on my family, pets, and property as much as is possible. Thus, I respectfully ask that you give serious consideration to my request to decide against Option 3 (Linear Ramp) as the bike path connection to West Hills Parkway.

Please feel free to contact me with any questions or for further discussion to address my outlined concerns.

Courteously,

 Alexandria Lowry
 (619) 250-3210 (cell)
 4all_nei@cox.net

H-16 The comment asserts that the visual analysis contained in Section 7.1(c) concludes that proposed retaining walls would only be seen by golfers. However, the analysis explains that *most* of the retaining walls within the interior of the golf course would only be seen by golfers, particularly if trees and shrubs are used to screen the walls from more distant views from nearby residences, but does acknowledge that other retaining walls would be constructed along the north side of bike path alignment and may be visible from certain vantage points such as residences in the project area, although given the distance across the golf course and the presence of intervening trees and landscaping, these retaining walls would not likely be highly visible from nearby residences.

Trees would be planted along the bike path within the golf course at large, medium, and small sizes to mimic the natural succession and variety of existing trees in the area; it is anticipated that approximately 25 percent would be 24-inch boxes, approximately 50 percent would be 15 gallon containers, and approximately 25 percent would be 5 gallon containers. Given the mix of trees sizes, the time for them to reach maturity would vary.

H-17 The comment asserts that the impact conclusion of less than significant identified in Section 7.12(d) of the Draft IS/MND regarding a substantial periodic increase in ambient noise levels is “false,” but does not provide specific details or supporting analysis to substantiate the statement. As discussed in Section 7.12(a), construction activities would temporarily elevate noise levels in the project vicinity, but construction noise would conform to applicable construction noise regulations per the City of Santee and City of San Diego. Therefore, impacts are appropriately determined to be less than significant.

H-18 The San Diego County Sheriff provides police protection services within the project area, and the Santee Fire Department provides fire and emergency services within the project area. The Draft IS/MND analyzed impacts to police, fire, and emergency services in Sections 7.14(a)(i) and (ii), which concluded that the proposed project would not increase the demand for police, fire, and emergency services to such an extent that new or physically altered governmental facilities would need to be constructed in order to maintain acceptable service ratios, response times, or other performance objectives. It would be speculative to try to quantify the increase in emergency calls that will occur because of this project so that information was not included in the Draft or Final IS/MND, consistent with the CEQA Guidelines.

As discussed in Section 7.14(a) in the Draft IS/MND (page 78), the traffic control plan to be implemented during project construction would provide for adequate emergency vehicle access along surrounding roadways. It would not *exclusively* provide access for only emergency vehicles, but would accommodate all vehicular traffic including emergency vehicles.

H-19 As discussed in Section 7.16(d) of the Draft IS/MND, a stop sign or similar measure would be installed where the proposed project meets West Hills Parkway to alert people using the bike path of possible cross traffic on the sidewalk and to yield to people on the West Hills Parkway sidewalk. The transition to the bike lane along the eastern side of West Hills Parkway would vary for each of the West Hills Parkway connection options. For the Switchback Ramp option, bike path users would enter the on street bike lane where the ramp would connect to the existing sidewalk. Under the Curvilinear Ramp and Linear Ramp options, bike path users would remain on the widened sidewalk to the West Hills Parkway/Carlton Oaks Drive intersection and then enter the bike lane within the roadway to the north or cross the roadway at this existing intersection to the bike lane on the other side of the road. A guardrail would be provided on the west side of the widened sidewalk (along the roadway), and a fence or similar safety barrier would be installed along the portion of the east side of the widened sidewalk where it is adjacent to a slope down to the golf course.

As concluded in Section 7.16(f) of the Final IS/MND, the project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities and thus finds that no impact would occur. The widened sidewalk would be 15 feet wide in order to safely accommodate both pedestrians and bicyclists.

H-20 The potential for the proposed project to result in “substantial physical deterioration” of the environment, including the visual character of the project area, is considered throughout the IS/MND, which concludes that the proposed project would not result in any significant impacts to the environment with the implementation of mitigation measures.

Please see the response to comment C-12 addressing trash management.

H-21 The proposed project is not “moving forward no matter what.” The SANDAG Transportation Committee will consider whether to adopt the Final IS/MND at its June 16, 2017, meeting. The other statements in this comment, including the commenter’s opposition to the Linear Ramp option for connecting to West Hills Parkway, will be provided to the Transportation Committee before its meeting to consider whether to approve the Final IS/MND.