San Diego River Trail – Carlton Oaks Golf Course Segment

State Clearinghouse No. 2017031037

SAN DIEGO ASSOCIATION OF GOVERNMENTS CITIES OF SAN DIEGO AND SANTEE SAN DIEGO COUNTY, CALIFORNIA

Public Review Draft <u>Final Initial Study/Mitigated Negative Declaration</u>

Prepared by the San Diego Association of Governments 401 B Street, Suite 800 • San Diego, CA 92101-4231 • (619) 699-1900



March June 2017

Preface

This is a Final Initial Study (IS)/Mitigated Negative Declaration (MND), prepared pursuant to the California Environmental Quality Act (CEQA), addressing the potential environmental effects of the implementation of the San Diego River Trail – Carlton Oaks Golf Course Segment Project. The Draft IS/MND was circulated for a 30-day public review period from March 15, 2017 to April 14, 2017 (State Clearinghouse No. 2017031037). Comments received during the public review period, as well as responses to the environmental issues raised in the comments, are provided in Appendix L.

In response to comments received on the Draft IS/MND, minor revisions and clarifications have been made to the Final IS/MND. All revisions are shown in strikeout and <u>underline</u> in the Final IS/MND. The Final IS/MND also includes minor editorial revisions and clarifications to the text of the Draft IS/MND.

In compliance with Public Resources Code §21081.6(a)(2) and CEQA Guidelines §15074(c), the documents and other materials that constitute the record of proceedings are located at 401 B Street, Suite 800, San Diego, California 92101, and the custodian of these documents is Andrew Martin, Senior Regional Planner. These documents and other materials include, at a minimum:

- All public notices issued by SANDAG in conjunction with the project.
- The Draft IS/MND and Final IS/MND, including all appendices and technical studies included or referenced in the Draft IS/MND and Final IS/MND.
- All comments submitted by agencies or members of the public during the 30-day public comment period on the Draft IS/MND and SANDAG's written responses to those comments.
- All comments and correspondence submitted to SANDAG with respect to the project.
- The Mitigation Monitoring and Reporting Program for the project (contained in Appendix M of the Final IS/MND).

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1.0 Introduction

The San Diego Association of Governments (SANDAG) proposes to construct the Carlton Oaks Golf Course Segment of the San Diego River Trail (SDRT) within the cities of San Diego and Santee (herein referred to as the "proposed project" or "project"). The proposed project would consist of a Class I bikeway for the exclusive use of people walking and riding bikes and related physical improvements. It would extend a distance of approximately two miles between Carlton Hills Boulevard and West Hills Parkway through Mast Park, Mast Park West, and the Carlton Oaks Golf Course. Specifically, the proposed project would extend westward from the Mast Park parking lot, under the Carlton Hills Boulevard bridge, and along the existing dirt trail that continues westward for approximately 0.5 mile through Mast Park West and terminates at the Carlton Oaks Golf Course. West of the terminus of the existing dirt trail, the proposed project would generally be constructed on or adjacent to the existing berm along the southern edge of the golf course for a distance of approximately 1.5 miles before its terminus at the existing sidewalk along West Hills Parkway.

The proposed project is located in a developed area with residential uses and the Carlton Oaks Golf Course to the north; Mast Park to the east, and open space to the west. The San Diego River is located adjacent to the proposed project on the south, with State Route 52 (SR-52) on the south side of the river until it crosses over the river at the west end of the project site. Figure 1 depicts the regional location of the project site, and Figure 2 shows the location of the project site and surrounding areas on an aerial photograph.

As the Lead Agency for the proposed project under the California Environmental Quality Act (CEQA), SANDAG has prepared an Initial Study (IS) to determine if the proposed project could have a significant effect on the environment. The IS identifies potentially significant effects to biological resources, cultural resources, and utilities and service systems (storm water improvements), but mitigation measures incorporated into the proposed project by SANDAG before the IS and this Mitigated Negative Declaration (MND) were circulated for public review would mitigate these effects to a point where no significant impacts would occur. There is no substantial evidence, in light of the whole record before the agency, that the project with the implementation of mitigation measures would have a significant effect on the environment. Therefore, pursuant to the Guidelines for Implementation of the California Environmental Quality Act (CEQA Guidelines) (§15070[b]]), SANDAG has prepared an MND for the proposed project. Included in this draft MND is the IS documenting the reasons supporting the finding of no significant effect on the environment.



Regional Location Map

SAN DIEGO RIVER TRAIL - CARLTON OAKS GOLF COURSE SEGMENT

Figure 1

02/08/17

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Project Vicinity Map

SAN DIEGO RIVER TRAIL - CARLTON OAKS GOLF COURSE SEGMENT





The Draft IS/MIND iswas available for a 30-day public review period pursuant to CEQA Guidelines Section 15105. The public review period occurred from will begin on March 15, 2017 to April 14, 2017. Written comments regarding the adequacy of the Draft IS/MND must be received by April 14, 2017. All written comments received during this review period are included in Appendix L along with written responses from SANDAG. Comments should bewere addressed or emailed to:

Andrew Martin, Senior Regional Planner San Diego Association of Governments 401 B Street, Suite 800 San Diego, CA, 92101 Email: <u>andrew.martin@sandag.org</u>

SANDAG shall prepare written responses to comments on environmental issues received during the noticed public review period. Written comments received by SANDAG will be included in the public record.

Copies of the Draft IS/MND and supporting materials <u>are-were</u> available at the SANDAG offices at the address provided above and online at:

http://www.keepsandiegomoving.com/RegionalBikeProjects/SDRiverTrail.aspx

A copy of the Draft IS/MND also iswas available at the following public libraries:

Santee Branch Library 9225 Carlton Hills Boulevard, #17 Santee, CA 92071

San Carlos Branch Library 7625 Jackson Drive San Diego, CA 92119

2.0 **Project Description**

Project Background

The proposed project is an approximately two-mile-long segment of the planned SDRT. The SDRT is envisioned as a regional trail system that extends along the San Diego River from the Pacific Ocean to its headwaters near Julian. SANDAG is leading the effort to implement portions of the SDRT included in the Regional Bike Network, which extends from the ocean east through the City of Santee. Once completed, the continuous trail would provide a multi-use path that extends between the beach communities and eastern suburbs along a scenic river corridor. The SDRT would provide access to employment centers, parks and open space areas, neighborhoods, and shopping centers along the river. In addition to functioning as a transportation facility that allows people to make everyday trips using a bike, the project would also serve as recreational resource for people biking and walking.

The San Diego River Park Master Plan (City of San Diego 2013a) provides the framework to establish a park along the portion of the San Diego River that traverses the City of San Diego. This 17.5-mile-long segment extends from the Pacific Ocean in the community of Ocean Beach to the City of Santee. The river park is planned to be composed of a series of parks linked by open space, pathways, and green corridors. The San Diego River Park Master Plan includes a recommendation to create a continuous, east-west, multi-use pathway from the Pacific Ocean to the City of Santee to serve as a transportation route and a recreational facility. The master plan refers to this pathway as the "San Diego River Pathway" and identifies the southern edge of the Carlton Oaks Golf Course as a potential location to accommodate a portion of the San Diego River Pathway. The proposed project would implement a portion of the San Diego River Pathway envisioned in the San Diego River Park Master Plan.

The SDRT has been constructed in segments over many years through the combined efforts of the San Diego River Conservancy (SDRC), the cities of San Diego and Santee, and the San Diego River Park Foundation. SANDAG is collaborating with these entities to complete the urban portions of the trail, including the proposed project. The Carlton Oaks Golf Course Segment is identified as a high priority project in Regional Bike Plan Early Action Program (SANDAG 2013) that the SANDAG Board of Directors approved in September 2013, and is one of two SDRT projects currently being developed by SANDAG. One of the goals of the Regional Bike Plan is to significantly increase the number of people who bike and the frequency of bicycle trips for all purposes (e.g., not just recreation, but also everyday 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.

In 2015, an Alternative Alignment Study (SANDAG 2015a) was prepared to develop potential alignments of the Carlton Oaks Golf Course Segment. Three alignments were initially considered and presented to the key stakeholders, including a northern alignment, a southern alignment, and central alignment. Based on input provided from the stakeholders, the northern and southern alignments were further evaluated. Feasibility of the northern alignment depended on a proposed redevelopment of portions of the golf course. Once that proposed golf course redevelopment was abandoned, it was determined that the northern alignment was no longer

feasible. It would require a right of access that the golf course owner would not grant because the trail would directly conflict with golf course operations. The proposed project is consistent with, and would implement the southern alignment as the Carlton Oaks Golf Course Segment of the SDRT.

Project Characteristics

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 approximately two miles between Carlton Hills Boulevard and West Hills Parkway through Mast Park, Mast Park West, 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, as shown on Figures 3a and 3b and described below.

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 held by the California Department of Fish and Wildlife (CDFW). Among other things, the conservation easement governs allowable uses of this property. The conservation easement would have to be amended in order for the project to be implemented as described below.

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 continue westward under the Carlton Hills Boulevard bridge and across a small drainage, and 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 approximately 8- to 14-foot-wide DG trail lined with split-rail fencing along with interpretive signage and benches at select locations, as well as 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 2 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.



Feet

Proposed Alignment

SAN DIEGO RIVER TRAIL - CARLTON OAKS GOLF COURSE SEGMENT

Figure 3a

March <u>June</u> 2017 Page 7



300 Feet

Proposed Alignment

SAN DIEGO RIVER TRAIL - CARLTON OAKS GOLF COURSE SEGMENT

Figure 3b

March June 2017 Page 8 The proposed project within this segment would consist of a 10-foot-wide, all-weather, paved surface with 2-foot-wide pervious shoulders on each side. The project proposes to incorporate design treatments into the bike path surface during final design such as use of earth-toned colors and textures to visually blend the project surface with the existing visual environment. Split-rail (i.e., lodge pole) 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, as described below. 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 would consist of a ford with natural bottom. Slope protection or similar measures to control erosion would be installed at locations on the east side of the bike path in slope areas along the northeast-southwest portion of the bike path where erosion is evident. Manufactured slopes created to accommodate the bike path would be at a 2:1 or 3:1 where erosion is evident gradient and would be revegetated with native plant species prior to completion of project construction. A typical cross-section of the proposed project within the Mast Park/Mast Park West Segment is illustrated in Figure 4.

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. The proposed project within the golf course would generally 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 2-foot-wide pervious shoulders and split-rail fencing on each side. Here too, the project proposes to incorporate earth-toned pavement colors and textures into the path surface to visually blend the pavement surface into the surrounding area. The existing berm would be improved by expanding, rebuilding, and/or reinforcing areas necessary to support the proposed bike path. Slope protection or similar measures to control erosion would be installed at locations within this segment on the south side of the bike path in slope areas where erosion is evident. Manufactured slopes would be created at a 2:1 or 3:1 gradient and would be revegetated 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. A typical cross-section of the proposed project within the Golf Course Segment is illustrated in Figure 4.



Typical Cross-sections

San Diego River Trail – Carlton Oaks Golf Course Segment

Figure 4

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Protective Fence

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. Protective fencing could be installed along the fairways of holes 3, 4, 5, and 15, and potentially other areas identified during final design. 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. The fence fabric would be coated with a black, brown, dark green, or other dark color to reduce its visibility. The safety fence may also be angled at the top to reduce the height.

Details regarding the final locations and materials of protective fencing would be determined during final design in consultation with the cities of San Diego and Santee and resource agencies issuing permits for the proposed project.

Tree Replacement

Trees removed from the golf course would be replaced at a 1:1 ratio with native or locally appropriate trees species that match the current golf course tree palette. All replaced trees would be a mix of sizes at installation to mimic natural succession and the variety of trees in the area: approximately 25 percent would be 24-inch-boxes, approximately 50 percent would be 15-gallon containers, and the approximately 25 percent would be 5-gallon containers.

Options for Connecting to West Hills Parkway

At the proposed project's western end, SANDAG is considering the following three options for a connection to West Hills Parkway. The environmental effects of these options are analyzed in this IS/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. Additionally, no acquisition of right-of-way would be required under any of these options.

- Switchback Ramp Option: this option entails 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. This option would also include installation of a proposed traffic signal and a continental crosswalk along West Hills Parkway at the intersection with Carlton Oaks Drive where the ramp would connect to the existing sidewalk.
- **Curvilinear Ramp Option**: this 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. This option also proposes the following improvements along West Hills Parkway:
 - Construction of an approximately 15-foot wide sidewalk to replace the existing 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

- Installation of a new guard rail along the proposed widened sidewalk
- Installation of chain-link fencing along a portion of the east side of the widened sidewalk
- Installation of curb ramps at each corner of the West Hills Parkway/Carlton Oaks Drive intersection
- Installation of continental crosswalks at the southern, eastern, and northern approaches to West Hills Parkway/Carlton Oaks Drive intersection to channel people to the existing Class II bike lane along the western (southbound) side of West Hills Parkway
- Relocation of the existing traffic signal at the southeast corner of the West Hills Parkway/Carlton Oaks Drive intersection
- Re-striping of portions of the roadway to accommodate the proposed roadway improvements
- Linear Ramp Option: this 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. This option would also include the proposed roadway improvements along West Hills Parkway identified above for the Curvilinear Ramp Option, although less area and length would likely be needed for the widened sidewalk and associated roadway improvements (e.g., new guardrail and re-striping).

Retaining Walls

Several 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. One retaining wall up to approximately four feet high would be constructed near the tee box on hole 5, and three walls up to approximately four feet high would be constructed near the tee box on hole 15. Two other walls, from one to seven feet tall, would be constructed along the project alignment where it would turn northward near the tee box on hole 16. An existing key-stone style wall in this area would be removed. The new retaining walls would be approximately as tall as the existing berm, and would face toward the golf course.

Additional retaining walls may be constructed in conjunction with the options for the West Hills Parkway connection. No retaining walls would be required for the Curvilinear Ramp Option. One retaining wall between approximately two and seven feet in height would be constructed for the Switchback Ramp Option along the slope where the ramp would turn to the south. For the Linear Ramp Option, one retaining wall up to approximately two feet in height would be constructed along a portion of the east side of the ramp near where it would connect to the existing sidewalk. Proposed retaining walls would be constructed with color and texture selected to resemble features within the golf course. Designs to be considered include plantable concrete blocks, textured concrete, post and timber walls, and wooden planks. New walls would include texture and natural colors, and could include poured-in-place concrete, textured block, shotcrete, or other sand-blasted surfaces.

Golf Course Coordination

SANDAG has been working with the Carlton Oaks Golf Course since the early planning stages of the proposed project to minimize effects on golf course operations. Substantial coordination has occurred with golf course staff in regard to designing the proposed project to minimize, as much as feasible, permanent and temporary modifications to golf course areas, such as tee boxes, greens, and golf cart paths. SANDAG will continue to work with the golf course through final design to minimize changes to the golf course and to identify a construction approach that minimizes temporary disruptions to golf course operations.

Implementation of the proposed project would temporarily or permanently affect some existing golf course facilities, as described below. These modifications have been discussed with golf course staff as part of the ongoing coordination occurring between SANDAG and the golf course. The project would require permanent relocation of one tee box on hole 5. During construction of the proposed project, portions of existing golf cart paths would be temporarily relocated. Tee boxes on holes 5, 11, 15, and 16 also would be temporary affected during construction to accommodate a temporary construction access road, but the tee boxes and cart paths would be rebuilt by SANDAG prior to completion of construction.

Lighting

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. Lighting types would include pole-based lighting consistent with the design guidelines contained within the San Diego River Park Master Plan and in accordance with lighting regulations of the City of San Diego (Section 142.0740 in the San Diego Municipal Code; City of San Diego 2014) and the City of Santee (Section 17.30.030 of the Santee Municipal Code; City of Santee 2014). Per the design guidelines of the San Diego River Park Master Plan, lighting elements along the San Diego River Pathway should (1) 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. While project lighting would adhere to the overall design guidelines in the San Diego River Park Master Plan, the specifics of the lighting design would be determined during final design in consultation with the resource agencies during project permitting (i.e., U.S. Army Corps of Engineers [USACE], U.S. Fish and Wildlife Service, CDFW, Regional Water Quality Control Board [RWQCB]).

Construction

For purposes of the environmental analysis of the IS/MND, construction of the project is estimated to begin in late 2018 and take approximately 12 months to complete. Grading would occur over an approximately 16-acre area and would require approximately 2,000 cubic yards (cy) of cut material and approximately 12,000 cy of fill material, resulting in approximately 10,000 cy of fill to be imported to the project site. The analysis assumes that construction activities would occur during daytime hours.

Construction staging is anticipated to occur within the golf course and would avoid sensitive biological resources. Construction vehicles would be stored within the golf course staging area rather than transported onto and off of the site each day in order to minimize vehicle miles traveled and the resulting air pollutant and GHG emissions and noise levels. Construction access routes, which in general would be used by construction workers and for delivery of construction materials, could be provided from one or more of the following locations:

- West Hills Parkway (construction access would occur from West Hills Parkway under any of the West Hills Parkway connection options described previously);
- an existing unpaved access road within a Padre Dam Municipal Water District easement on private property owned by the Vista del Verde homeowners association and along the eastern boundary of the golf course accessible from Carlton Oaks Drive (herein referred to as the Padre Dam Easement Construction Access); and/or
- the parking lot at Mast Park, which could require excavation to a depth of approximately three feet under the Carlton Hills Boulevard bridge to provide adequate vertical clearance for construction equipment, and along the existing dirt trail in Mast Park West.

Final staging location(s) and access routes for construction would be determined during final design or prior to the start of construction, and in consultation with the affected property owner(s). Before using any construction staging areas or access routes, SANDAG would work with affected property owner(s) to obtain their permission to use their property in accordance with existing laws and regulations.

Construction activities would comply with local agency construction noise requirements of the cities of Santee and San Diego, as contained in Section 8.12.290 of the Santee Municipal Code (City of Santee 2014) and Section 59.0404 of the City of San Diego Municipal Code (City of San Diego 2010). These restrictions prohibit construction activities between the hours of 7:00 p.m. and 7:00 a.m. and on Sundays and legal holidays and limit construction noise levels to not in excess of an average of 75 decibels (dBA) at the property line of a residential use over an 8- or 12-hour period. Construction vehicles on the project site shall be required to not exceed 25 miles per hour.

3.0 SANDAG Discretionary Actions

SANDAG discretionary actions related to the proposed project include:

- Adopting the Final IS/MND for the proposed project.
- Directing staff to proceed with final design and construction.

4.0 Other Agency Permits and Approvals

Permits or approvals that SANDAG may need to obtain prior to construction of the proposed project include, but are not limited to:

- Clean Water Act (CWA) Section 404 authorization (Nationwide Permit 14) from the USACE,
- Section 401 Water Quality Certification from the San Diego RWQCB,
- National Pollutant Discharge Elimination System (NPDES) General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit) from the State Water Resources Control Board,
- Fish and Game Code Section 1602 Streambed Alteration Agreement from the CDFW,
- Federal Endangered Species Act Section 7 Consultation with the U.S. Fish and Wildlife Service (USFWS),
- Fish and Game Code Section 2080 Incidental Take Permit from CDFW,
- Amendment to the Mast Park West Conservation Easement held by CDFW, and
- Conditional Letter of Map Revision <u>and Letter of Map Revision (LOMR)</u> from the Federal Emergency Management Agency (FEMA).

5.0 Environmental Factors Potentially Affected

The environmental factors checked below would potentially be affected by this project, involving at least one impact that is a "Less than Significant Impact With Mitigation Incorporated." The other environmental factors would involve impacts that are "Less Than Significant" or "No Impact." Please see the CEQA IS checklist (Section 7.0) for supporting information.

 Aesthetics and Visual Resources 	 Agriculture and Forestry Resources 	□ Air Quality
 Biological Resources 	 Cultural Resources 	□ Geology and Soils
□ Greenhouse Gas Emissions	 Hazards and Hazardous Materials 	 Hydrology and Water Quality
□ Land Use and Planning	□ Mineral Resources	□ Noise
□ Population and Housing	□ Public Services	□ Recreation
□ Transportation/Traffic	 Utilities and Service Systems 	 Mandatory Findings of Significance

6.0 Determination

On the basis of the initial evaluation that follows:

- □ The proposed project is exempt from CEQA pursuant to the general exemption (CEQA Guidelines, 15061 (b)(3)), a statutory exemption, and/or a categorical exemption, and that if a categorical exemption, none of the exceptions to the exemption apply. A NOTICE OF EXEMPTION will be prepared.
- □ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- □ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- □ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, no further environmental document is required. FINDINGS consistent with this determination will be prepared.

Signature

Keith Greer, Principal Regional Planner

6/6/17

Date For: San Diego Association of Governments

7.0 CEQA Initial Study Checklist

This IS checklist identifies potentially significant effects to biological resources, cultural resources, and utilities and service systems (storm water improvements) for the proposed project. The implementation of mitigation measures BIO-1 through BIO-12 and CUL-1 identified in this IS would ensure potentially significant biological and cultural resources impacts are less than significant with mitigation incorporated. Implementation of mitigation measures BIO-4, BIO-5, and BIO-11 identified in this IS would reduce potentially significant impacts related to utilities and service systems (storm water improvements) to less than significant with mitigation incorporated impacts would be less than significant or no impact would occur. The following significance thresholds for each environmental issue are from Appendix G of the CEQA Guidelines.

- A. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- B. "Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from earlier analyses may be cross-referenced).
- C. "Less Than Significant Impact" applies where the project creates no significant impacts, only less than significant impacts.
- D. "No Impact" applies where a project does not create an impact in that category. "No Impact" answers do not require an explanation if they are adequately supported by the information sources cited by the lead agency which show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project specific screening analysis).

7.1 <u>Aesthetics and Visual Resources</u>

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the proposed project:				
a. Have a substantial adverse effect on a scenic vista?				
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				•
c. Substantially degrade the existing visual character or quality of the site and its surroundings?				
d. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?				

The following discussion is based, in part, on a Visual Impact Assessment prepared for the project (Appendix A).

a. Would the project have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. The proposed project is located adjacent to the San Diego River, one of the region's major river corridors, which traverses San Diego County in an east-west alignment from its headwaters near Julian to the Pacific Ocean. Some portions of the river corridor are edged with development, but many reaches, including the proposed project area, are characterized by natural riverine elements, including riparian vegetation, open water, and wildlife, which provide scenic resources and create scenic visual experiences for viewers. The 17.5-mile-long segment of the river within the City of San Diego that extends from the Pacific Ocean in the community of Ocean Beach to the City of Santee is addressed in the San Diego River Park Master Plan (City of San Diego 2013a), which provides the framework to establish a river park along the entire portion of the San Diego River that traverses the City of San Diego. The park is envisioned to be composed of a series of parks linked by open space, pathways, and greenways. The San Diego River Park Master Plan includes a recommendation to create a continuous, east-west, multi-use pathway along the river park to serve as a transportation route for making everyday trips by bike and a recreational facility. The master plan refers to this pathway as the "San Diego River Pathway" and identifies the berm on the southern edge of the Carlton Oaks Golf Course and northern edge of the San Diego River as a potential location to accommodate the San Diego River Pathway. The proposed project would help achieve the 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.

The project site is not located within any designated scenic vistas or view corridors identified in the *East Elliott Community Plan* (City of San Diego 2015) or *Santee General Plan 2020* (City of Santee 2003); however, the adjacent San Diego River corridor is identified as an important scenic resource in these planning documents, which contain policies to protect and enhance the

river corridor and its scenic qualities. Consistent with this overarching goal in these planning documents, including the aforementioned *San Diego River Park Master Plan*, the proposed project would protect and enhance the river corridor. Much of the bike path would be constructed on an existing berm that would be widened and reinforced in some areas, and also would be set back from the adjacent river to minimize encroachments into the river and impacts to native vegetation along the northern side of the river corridor. The project would also install native vegetation along the slopes of the berm compatible with the existing riparian vegetation within the river corridor. Implementation of the proposed project would provide people the opportunity to bike and walk along the San Diego River and experience its scenery.

The proposed project would occur in an area that is not highly visible from surrounding public vantage points. Motorists on West Hills Parkway and SR-52 would have brief, partial views of the proposed project, although riparian vegetation along the San Diego River would mostly screen views of the bike path. Other viewer groups would include golfers within the golf course, some residents at nearby homes, people within Mast Park (west end only), and path users on the proposed bike path. Views of the San Diego River corridor would not be adversely affected from off-site locations as a result of the project. While project elements would cause some noticeable changes to the visual environment along the river corridor, they would not be highly noticeable to most viewers or substantially contrast with the existing visual environment.

The project would mostly consist of low-profile structures (bridge or similar crossing structure) and trail bed, as well as non-obtrusive vertical elements, such as split-rail fencing and light poles. The most visible introduced element would consist of safety fencing along some short sections of the northern side of the bike path to protect path users from errant golf balls, most likely near the fairways on holes, 3, 4, 5, and 15. The safety fence could be constructed from a variety of materials, such as wood framed, welded wire mesh, or chain link. The fence fabric would be coated with a black, brown, dark green, or other dark color to reduce its visibility. The safety fence may also be angled at the top to reduce the height. Color and material could reduce the visibility of the safety fence, as could vegetation. The scale of the safety fence would be overshadowed by the dense mosaic of existing mature riparian trees that line the river corridor. These remaining mature trees in the area would be taller than the proposed safety fence, which would ensure that the fence would not be out of scale with the visual environment of the area. Trees removed from the golf course would be replaced at a 1:1 ratio with native or locally appropriate trees species that match the current golf course tree palette. All replaced trees would be a mix of sizes at installation to mimic natural succession and the variety of trees in the area: approximately 25 percent would be 24-inch-boxes, approximately 50 percent would be 15-gallon containers, and the approximately 25 percent would be 5-gallon containers. Additionally, where feasible, replacement tress would be located in a manner that provides visual screening of safety fencing.

Similarly, retaining walls ranging from one to seven feet high would be constructed at select locations along the bike path, but these man-made elements would include design features, such as use of natural colors and textures visually similar to existing walls within the golf course to visually blend them in with the existing visual environmental. These project elements would be visually consistent with the surrounding environment and would not obstruct or otherwise have a substantial adverse effect on designated or other scenic vistas. Therefore, the proposed project

would not have a substantial adverse impact on a scenic vista. This impact is less than significant.

b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. The proposed project is not located within a state scenic highway. The proposed project is located approximately 0.3 mile to the southeast of the segment of SR-52 between Santo Road and Mast Boulevard that is officially designated as a California scenic highway (Caltrans 2016). Therefore, the project would not substantially damage scenic resources within a state scenic highway. There is no impact.

c. Would the project substantially degrade the existing visual character or quality of the site and its surroundings?

Less Than Significant Impact. The proposed project occurs within the visual and planning context of the San Diego River corridor and as discussed in Section 7.1(a), the *San Diego River Park Master Plan* (City of San Diego 2013a) envisions the establishment of a river park along the entire portion of the San Diego River corridor that traverses the City of San Diego, which extends approximately 17.5 miles from the Pacific Ocean in the community of Ocean Beach to the City of Santee. The *San Diego River Park Master Plan* provides the policy framework to create the river park along this stretch of the river corridor, which encompasses the project area. The master plan contains guiding principles, as well as recommendations, to achieve the guiding principles. One of the identified guiding principles is to "create a connected continuum, with a sequence of unique places and experiences," with a recommendation to create the "San Diego River Pathway" and specifically identifies the berm on the southern edge of the Carlton Oaks Golf Course as a potential location to accommodate a portion of the San Diego River Pathway. The proposed project would implement a portion of the San Diego River Pathway envisioned in the *San Diego River Park Master Plan* and provide people the opportunity to bike and walk along the San Diego River and experience its scenic qualities.

Visual Setting

The visual setting of the project area mostly consists of relatively large open spaces formed by the existing golf course and flood plain of the adjacent San Diego River. Views from the existing trail and berm to the northeast are expansive, interrupted only by occasional mature trees found on the golf course. Northward views extend to an existing residential development comprised of one- and two-story homes bordering the golf course. The upper portions of these houses are visible from many locations along the existing berm, but the residential structures are not prominent. Distant hills make up the horizon line behind the residential area to the north. Views to the southwest from the berm are more restricted due to the thicker and taller vegetation growing within the San Diego River and its associated natural habitats. The river vegetation effectively blocks views of SR-52 which extends east-west along the south side of the river.

Within the eastern portion of the project site, the existing trail extends northward, then eastward toward Carlton Hills Boulevard, through San Diego River riparian areas, and alongside a seasonal pond. The existing trail in this area is edged on both sides with a post and rail fence, and

dense riparian vegetation occurs both north and south of the trail, blocking distant views. At the west end of the project area, SR-52 crosses over the river and golf course open space areas, and over West Hills Parkway. SR-52 is vaulted over the area on a concrete viaduct supported by tall concrete pillars.

The existing visual setting is mostly intact on the south and southwest side of the berm, with natural vegetation patterns formed by riparian trees and mature shrubs that fill in between the pockets of larger trees. The setting north and northeast of the berm is more varied, but is harmonious and consistent in its patterns of open turf greens of the golf course punctuated with tree massings. These views are not of a visually intact natural area, but the undulating golf course landforms and groups of trees are supportive of a naturalized open space.

West Hills Parkway creates a visual boundary to the golf course and open space within the project area on the northwest side, since it is higher in elevation than the golf course. The road is supported by a sparsely vegetated slope, screened from most views by trees within the golf course and the river. The SR-52 viaduct creates a strong horizontal line high above the road, the hill, and the golf course. The visual environment of the west end of the project area is, therefore, less intact due to the contrast created by the strong horizontal lines of the roadways.

Similarly, the northwest corner of the project area abuts residential lots, which also are higher in elevation than the golf course. Most of the residential lots are supported by sparsely vegetated slopes and are lined with chain link fences. The lot at the western edge of the neighborhood, next to West Hills Parkway, has a prominent concrete masonry wall visible from the golf course and the proposed bike path location. The contrast between the golf course open spaces and the fences, houses, and the wall reduces the intactness of the visual environment of the project area.

Visual Changes

For the most part, the proposed project would not contrast with the existing visual environment. For one, the introduction of a hard-surface trail where a soft-surface trail currently exists would not create a notable visual change. The widening of the berm to accommodate the bike path would require the removal of up to approximately 100 mature trees along either side of the existing berm within the grading footprint. While golfers and trail users would see this change, viewers from off-site locations would only notice the tree removal if they are already familiar with the area. 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 (for additional discussion, refer to Section 7.4, Biological Resources). The proposed project would include revegetation of the berm, as well as installation of replacement trees within the golf course. Trees and shrubs installed on the river side of the berm would be native and appropriate to the habitat specific to the immediate area in which they are placed. Trees removed from the golf course would be replaced at a 1:1 ratio with native or locally appropriate trees species consistent with the existing trees within the golf course. All replaced trees would be a combination of sizes at installation to mimic natural succession and the variety of 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. Shrubs and ground cover would be used to revegetate both sides of the berm. Native plants would be used to enhance the habitat areas on the river side, and native and locally appropriate species would be used on the

golf course side. Turf within the golf course disturbed by construction would be replaced in kind. No invasive tree, shrub, or ground cover species would be used. Because of the proposed tree planting and revegetation efforts, distant views from the trail would not substantially change, and views to the trail area also would be similar to existing conditions.

The trail surface would be wider, more refined, and consistent along its length than the current gravel and compacted soil surface of the varying width of the existing trail. The landform changes to the berm would be mostly consistent with the current forms, and would not create a substantial visual contrast with the existing visual environment.

The project includes the installation of split-rail fencing along both sides of the alignment, using natural or synthetic materials that resemble wood in color and texture. This fence, as shown in the cross-sections in Figure 4, would be visually similar to the existing fence edging the existing DG trail within Mast Park West. As discussed in Section 7.1(a), a 6- to 10-foot tall safety fence would be installed along some short sections of the trail where necessary (anticipated near the fairways on holes, 3, 4, 5, and 15) to protect bike path users from errant golf balls from the golf course. The safety fence would be the most visible element of the fencing system, both from the trail itself and from the golf course. The design of the safety fence would incorporate colors, materials, and features as discussed above in Section 7.1(a) to reduce its visibility. Refer to Figure 4 for a conceptual depiction of the safety fence, which would ensure that the fence would not be out of scale with the visual environment of the area. Where feasible, new trees planted to replace trees removed during construction would be located to provide additional screening of the safety fencing.

Other noticeable changes would consist of the construction of retaining walls ranging from one to seven feet tall 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) and potentially at the west end of the project site as the bike path connects to West Hills Parkway. One retaining wall up to approximately four feet high would be constructed near the tee box on hole 5, and three walls up to approximately four feet high would be constructed near the tee box on hole 15. Two other walls, ranging from one to seven feet tall, would be constructed near the tee box on hole 16. The new retaining walls would be approximately as tall as the existing berm, and would face toward the golf course. Additional retaining walls may be constructed in conjunction with the options for the West Hills Parkway connection. One retaining wall between approximately two and seven feet in height would be constructed for the Switchback Ramp Option and one retaining wall up to approximately two feet in height would be required for the Linear Ramp Option. No retaining walls would be required for the Curvilinear Ramp Option. Most of the proposed retaining walls would only be seen by golfers, particularly if trees and shrubs are used to screen walls from more distant views from residences. Trail users would not see most of the walls, since they would be below the trail and facing the golf course. Proposed retaining walls 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.

Proposed temporary and permanent modifications to the golf course resulting from the project would include permanent relocation of one tee box on hole 5; temporary relocation of tee boxes on holes 5, 11, 15, and 16; and temporary relocation of portions of existing cart paths. These changes to the tee boxes and cart paths would not be highly noticeable because the final configuration would be visually similar to the existing golf course.

Grading activities associated with the connection to West Hills Parkway also would create a visible change in the project area. Each of the three West Hills Parkway connection options being considered would include a staircase that would connect the trail to the existing sidewalk of West Hills Parkway, a ramp, and 2:1 manufactured slopes. Each of the three West Hills Parkway connection options (Switchback Ramp, Curvilinear Ramp, and Linear Ramp) would require a 2:1 manufactured slope that would be up to 20 feet tall. The slope would be similar in configuration and height to the existing slope below West Hills Parkway. Proposed manufactured slopes would be planted with vegetation to reduce the contrast with the surrounding visual environment. The West Hills Parkway connection options would also require some improvements along West Hills Parkway. Depending on the option, proposed roadway improvements would include sidewalk widening, installation of new guard rail and curb ramps, re-striping, installation of painted crosswalks, and/or installation/relocation of traffic signals. These types of improvements would be visually consistent with existing roadway elements in the project area and would be substantially similar in appearance to the existing roadway configuration.

Conclusion

Overall, project elements would be visually consistent with the surrounding environment and the resulting change to visual character and quality resulting from the proposed project would be minimal. Therefore, the proposed project would not substantially degrade the existing visual character or quality of the site and its surroundings. This impact is less than significant.

d. Would the project create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. The proposed project potentially would include the installation of pedestrian-scaled safety lighting along the project alignment at select locations. Proposed lighting would be consistent with applicable lighting regulations and guidelines, including those contained in the *San Diego River Park Master Plan* (City of San Diego 2013a), the City of San Diego Municipal Code (Section 142.0740; City of San Diego 2014), and the City of Santee Municipal Code (Section 17.30.030; City of Santee 2014). Per the design guidelines of the *San Diego River Park Master Plan*, lighting elements along the San Diego River Pathway should consist of metal or concrete poles and triangular fixtures painted natural sand or warm gray/brown at a maximum height of 12 feet, and be directional with shields to avoid light overspill into adjacent habitat. Lighting regulations per Section 142.0740 of the San Diego Municipal Code require outdoor lights to be directional and shielded to control light from spilling onto surrounding properties, and to be of low illumination where adjacent to sensitive biological resources. Section 17.30.030 of the Santee Municipal Code also requires all lighting to be designed and adjusted to reflect light away from adjoining properties. Proposed project lighting would comply with these design guidelines and lighting regulations; lighting would

consist of fixtures on 8- to 12-foot tall poles and would be shielded and directed towards the bike path and away from the river to avoid spillover into the adjacent San Diego River riparian corridor and its habitats or surrounding land uses. Poles and fixtures would be natural colors, such as sand, and fixtures would be triangular in shape. Adherence to these guidelines and regulations would ensure that project lighting would not create a new source of substantial light within the project area.

Project elements also would not include highly reflective surfaces or materials that would create adverse glare effects on surrounding roadways or uses. As discussed above, project lighting would consist of pedestrian-scaled safety lighting designed to direct lighting onto the project alignment and not onto surrounding properties or roadways that would create a new source of glare. In general, surfaces and materials of project elements would consist of natural or dark colors and natural or textured surfaces that do not exhibit reflective properties. Therefore, the proposed project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. This impact is less than significant.

Environmenta	l Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the proposed project:					
a. Convert Prime Farmland, Un Farmland of Statewide Imposishown on the maps prepared Farmland Mapping and Mon the California Resources Ag agricultural use?	nique Farmland, or ortance (Farmland), as I pursuant to the nitoring Program of ency, to non-				
b. Conflict with existing zoning or a Williamson Act contract	g for agricultural use t?				
c. Conflict with existing zonin, rezoning of, forest land (as of Resources Code section 122 defined by Public Resources or timberland zoned Timber defined by Government Cod	g for, or cause lefined in Public 20(g)), timberland (as code section 4526), land Production (as le section 51104(g))?				
d. Result in the loss of forest la forest land to non-forest use	nd or conversion of ?				
e. Involve other changes in the which, due to their location in conversion of Farmland to or conversion of forest land	existing environment, or nature, could result o non-agricultural use to non-forest use?				

7.2 Agriculture and Forestry Resources

a. Would the project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The California Department of Conservation Farmland Mapping and Monitoring Program (California Department of Conservation 2012) indicates that no Prime Farmland, Unique Farmland, or Farmland of Statewide Importance is mapped on the project site or in the project vicinity. Therefore, the proposed project would not convert prime farmland or farmland of statewide importance to non-agricultural use. There is no impact.

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The project site is not the subject of a Williamson Act contract and is not zoned for agricultural use. Therefore, the proposed project would not conflict with existing zoning for agricultural use or a Williamson Act contract. There is no impact.

c. Conflict with existing zoning for or cause rezoning of forest land, timberland, or timberland zoned Timberland Production?

No Impact. The project site is not zoned for forest land or timber land uses. Therefore, the proposed project would not conflict with existing zoning for or cause rezoning of forest land, timberland, or timberland zoned Timberland Production. There is no impact.

d. Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. For the purposes of analysis within this IS, "forest land" is characterized by the definition contained in Public Resources Code Section 12220(g), which defines "forest land" as land that can support 10 percent native cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits. Based on this definition, no forest land occurs within or adjacent to the project site. While the project area contains the vegetation community termed southern riparian forest and project implementation would impact this habitat type (refer to Section 7.4[b] for discussion of project impacts to southern riparian forest), this vegetation community does not meet the above definition of forest land. Therefore, the proposed project would not result in the loss of forest land or conversion of forest land to non-forest use. There is no impact.

e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

No Impact. As discussed above in Sections 7.2(a) through 7.2(d), no Farmland or forest land is present in the project vicinity. Therefore, the proposed project would not involve other changes in the existing environment which, due to their location or nature, could result in the conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use. There is no impact.

7.3 <u>Air Quality</u>

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the proposed project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?				
b. Violate any air quality standard or contribute sub- stantially to an existing or projected air quality violation?				
c. Result in a cumulatively considerable net increase of any criteria pollutant for which the San Diego region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions that exceed quantitative thresholds for ozone precursors)?			•	
d. Expose sensitive receptors to substantial pollutant concentrations?				
e. Create objectionable odors affecting a substantial number of people?				

The following discussion is based on an Air Quality and Greenhouse Gas Technical Analysis prepared for the project (Appendix B).

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The project site is located within the San Diego Air Basin (SDAB). The San Diego Air Pollution Control District (SDAPCD) manages air quality in the SDAB. Air quality plans applicable to the SDAB include the San Diego Regional Air Quality Strategy (RAQS; SDAPCD 2016) and applicable portions of the State Implementation Plan (SIP) (SDAB is a non-attainment area for state ozone standards), the federal carbon monoxide (CO) maintenance plan (SDAB is maintenance area for the federal CO standard), and the federal maintenance plan for ozone (SDAB is a marginal non-attainment area for the federal 2008 Eight-Hour Ozone Standard). These air quality plans identify measures designed to attain state and federal air quality standards.

The RAQS identifies adopted control measures to reduce ozone precursor emissions. These measures apply to stationary sources such as certain types of boilers, water heaters, and stationary internal combustion engines. The RAQS also identifies incentive programs, transportation control measures (including bicycling improvements), and indirect source programs to reduce ozone precursor emissions from mobile sources. Implementation of the proposed bikeway and related improvements would further implement transportation control measures (i.e., bicycling improvements) identified in the RAQS to reduce ozone precursor emissions from mobile sources the SDAPCD's implementation of any control measures adopted to reduce ozone precursor emissions from

stationary sources, or any incentive programs or indirect source programs identified in the RAQS to reduce ozone precursor emissions from stationary sources.

The federal CO maintenance plan and federal maintenance plan for ozone establish motor vehicle emissions limits for CO and ozone precursor emissions, respectively, for the SDAB. Implementation of the proposed bikeway and related improvements would not increase motor vehicle emissions in the SDAB, and therefore would not conflict with or obstruct implementation of the federal maintenance plans for CO and ozone. As a result, the construction and operation of the proposed project would not conflict with or obstruct implementation of any applicable air quality plans. Therefore, this impact is less than significant.

b. Would the project violate any air quality standard or contribute substantially to an existing or projected air quality violation?

Less Than Significant Impact. Under the federal Clean Air Act of 1970 and its subsequent amendments, the U.S. Environmental Protection Agency established the National Ambient Air Quality Standards (NAAQS) for criteria pollutants, including CO, sulfur dioxide (SO₂), nitrogen dioxide (NO₂), ozone (O₃), particulate matter of less than 10 microns in size (PM₁₀), particulate matter of less than 2.5 microns in size (PM_{2.5}), and lead (Pb). Ozone is not emitted directly, but is formed from a complex set of reactions involving ozone precursors, such as nitrogen oxides (NO_X) and reactive organic gases (ROG). The California Air Resources Board (CARB) subsequently established more stringent California Ambient Air Quality Standards (CAAQS) for these pollutants, as well as for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. Areas that do not meet the NAAQS or CAAQS for a particular pollutant are considered to be "non-attainment areas" for that pollutant. On April 30, 2012, the SDAB was classified as a marginal non-attainment area for the 8-hour NAAQS for ozone. The SDAB is an attainment area for the NAAQS for all other criteria pollutants. The SDAB currently falls under a national "maintenance plan" for CO, following a 1998 redesignation as a CO attainment area. The SDAB is currently classified as a non-attainment area under the CAAQS for ozone (serious nonattainment), PM₁₀, and PM₂₅. The California Clean Air Act does not require preparation of attainment plans for particulate matter.

Construction Emissions

Construction activities associated with the project would generate short-term emissions of criteria pollutants, including ROG, NO_X , CO, PM_{10} , and $PM_{2.5}$. Emissions would originate from off-street diesel equipment exhaust, employee and material delivery vehicle exhaust, re-entrained paved road dust, and fugitive dust from land clearing. The proposed project would comply with applicable SDAPCD emissions and fugitive dust measures, and would implement best management practices (BMPs) to reduce the emission of criteria pollutants during construction. These BMPs would include routine dust control and use of construction equipment fitted with appropriate air emission controls. Standard fugitive dust control measures in compliance with local dust control requirements would include regular watering of the active construction areas and unpaved surfaces and/or use of chemical control. Project construction emissions are anticipated to be minimal and would be temporary and localized within the immediate project vicinity.

An estimate of the maximum daily construction emissions associated with construction of the project is presented in Table 1. Project construction emissions were compared to the SDAPCD's Air Quality Impact Analysis (AQIA) Trigger Levels as contained within SDAPCD Regulation II, Rule 20.2. As shown in Table 1, criteria pollutant emissions associated with project construction would be below the SDAPCD's AQIA Trigger Levels.

Table 1 ESTIMATED MAXIMUM DAILY CONSTRUCTION EMISSIONS							
Pollutant Emissions (pounds per day)							
Construction Activity	ROG	NO _X	СО	PM ₁₀	PM _{2.5}		
Grubbing/Land Clearing	2	28	15	4	2		
Grading/Excavation	7	82	45	7	4		
Drainage/Utilities/ Sub-Grade	5	38	33	5	3		
Paving	3	28	22	2	2		
Maximum Daily Emissions	7	82	45	7	4		
SDAPCD AQIA Trigger Levels	137	250	550	100	55		
Significant Impact? No No No No No							

Source: Appendix B

Operational Emissions

With the exception of the infrequent operation of maintenance vehicles along the bike path, the proposed bicycle facility would not be used by motorized vehicles. Thus, negligible operational emissions would be expected.

Conclusion

The proposed project would not violate any applicable air quality standard or contribute substantially to an existing or projected air quality violation because construction emissions would be less than SDAPCD's AQIA Trigger Levels and operational emissions would be negligible. This impact is less than significant.

c. Would the project result in a cumulatively considerable net increase of any criteria pollutant for which the San Diego region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

Less Than Significant Impact. The SDAB is currently classified as a federal non-attainment for ozone and a state non-attainment for ozone, PM_{10} , and $PM_{2.5}$. As shown in Table 1 and discussed in Section 7.3(b), construction emissions would be less than SDAPCD's AQIA Trigger Levels for criteria pollutant emissions (including ozone precursors) and operational emissions would be negligible. Therefore, the project's incremental ozone precursor and particulate matter emissions are not cumulatively considerable when considered together with such emissions from other past, present, and reasonably foreseeable projects in the SDAB. Over the long-term, the proposed project would contribute to lower vehicle emissions by providing the option to walk or bike in lieu of driving. The project would therefore not result in a cumulatively considerable net increase in criteria pollutants for which the San Diego region is non-attainment. This impact is less than significant.

d. Would the project expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Sensitive receptors are facilities and structures where people live or spend considerable amounts of time, including hospitals, retirement homes, residences, schools, and childcare centers. Single-family and multi-family homes are located north and south of the proposed bikeway. The nearest homes are located between approximately 50 and 200 feet to the north (depending on the West Hills Parkway connection options and potential Padre Dam Easement Construction Access) along Carlton Oaks Drive (The Oaks Apartments) and Calle Del Verde/Camino Del Verde. Other residences in the project vicinity include single-family neighborhoods to the south along Willowgrove Avenue and Gorge Avenue (approximately 100 homes) and to the north along Inverness Road (approximately 90 homes). The nearest school (Carlton Hills School) is located approximately 0.2 mile to the northeast from the nearest proposed construction area. Other nearby schools include Carlton Oaks School located approximately 0.3 mile to the north and West Hills High School located approximately 0.6 mile to the north.

As shown in Table 1 and discussed in Section 7.3(b), construction emissions from project-related construction activities would be less than SDAPCD's AQIA Trigger Levels for criteria pollutant emissions and operational emissions would be negligible. In addition, the location of construction vehicles and equipment would vary along the approximately two mile project alignment during the approximately one year duration of construction. Moreover, emissions levels at the sensitive receptor locations would be lower than emissions levels generated on the construction site because emissions dissipate as distance increases, and other factors such as wind patterns disperse pollutants. Project construction activities would comply with SDAPCD rules controlling emissions. Therefore, the proposed project would not expose sensitive receptors to substantial pollutant concentrations. This impact is less than significant.

e. Would the project create objectionable odors affecting a substantial number of people?

Less Than Significant Impact. Project construction (specifically, the use of diesel construction equipment and vehicles) could generate odors associated with fuel combustion. However, these odors would dissipate into the atmosphere upon release, and would only temporarily remain in proximity to the construction equipment and vehicles. Potential odors would be temporary and localized within the immediate project vicinity. Such temporary odors may be detectable by a limited number of nearby residents, as well as employees and golfers at the golf course. In addition, operation of the project would not generate objectionable odors, as fuel combustion would only occur through equipment used for occasional maintenance. Therefore, the proposed project would not create objectionable odors affecting a substantial number of people. This impact is less than significant.

7.4 <u>Biological Resources</u>

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the proposed project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				
 b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service? 				
c. Have a substantial adverse effect on federally or state protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) or Section 1600 <i>et</i> <i>seq.</i> of the California Fish and Game Code through direct removal, filling, hydrological interruption, or other means?				
d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?		•		
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				
f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				

Unless otherwise noted, the following analysis is based on the Biological Technical Report and Jurisdictional Delineation Report prepared for the project (Appendices C and D, respectively).

a. Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant With Mitigation Incorporated. A general biological survey of the Biological Study Area (BSA) was conducted on June 22 and 23, 2016; rare plant surveys were conducted on May 23, and June 24, 2016; and protocol surveys for the federally listed as threatened coastal California gnatcatcher (*Polioptila californica californica*), the federally and

state listed as endangered least Bell's vireo (*Vireo bellii pusillus*), and the federally and state listed as endangered southwestern willow flycatcher (*Empidonax traillii extimus*) were conducted between May and July 2016. Prior to conducting field surveys, a search of regulatory agency databases was conducted for information regarding sensitive species known to occur within two miles of the project site, including the U.S. Fish and Wildlife Service (USFWS) species records, CDFW California Natural Diversity Database (CNDDB), and California Native Plant Society (CNPS) Electronic Inventory.

Special Status Plant Species

One special status plant species was observed during biological surveys conducted within the BSA: San Diego marsh elder (*Iva hayesiana*). This observed species is not state or federally listed, but is included in the CNPS' Inventory of Rare and Endangered Plants as a California Rare Plant Rank (CRPR) List 2 plant species. A total of 17 individuals were observed in southern riparian forest habitat on the south side of the existing berm in the southeastern portion of the BSA.

Project implementation (any of the West Hills Parkway connection options) would impact two San Diego marsh-elder individuals. Project impacts to two individuals of this CRPR plant species are not considered significant because they would not affect the regional long-term survival of this species, which are known from other portions of the BSA, as well as other locations in the project vicinity. In addition, this species is not identified as sensitive in the City of San Diego's Multiple Species Conservation Program (MSCP) Subarea Plan (City of San Diego 1997).

Special Status Animal Species

A total of five special status animal species were observed during biological surveys within the BSA, including the Cooper's hawk (Accipiter cooperii), least Bell's vireo, white-tailed kite (Elanus leucurus), yellow-breasted chat (Icteria virens), and yellow warbler (Setophaga petechial). One individual Cooper's hawk (raptor), a CDFW Watch List species and a sensitive species identified in the City of San Diego's MSCP Subarea Plan, was observed perched in southern riparian forest in the western portion of the BSA. Least Bell's vireo, a federal and stated listed endangered species and a sensitive species identified in the City of San Diego's MSCP Subarea Plan, was detected in five locations within and adjacent to the BSA. One individual white-tailed kite (raptor), a State Fully Protected species, was observed flying over the southern riparian forest south in the eastern portion of the BSA. Yellow-breasted chat, a State Species of Special Concern, was detected in two locations in southern riparian forest within the western portion of the BSA. Yellow warbler, a federal Bird of Conservation Concern and State Species of Special Concern, was observed in southern riparian forest in six locations within the BSA. The project would result in impacts to riparian habitat areas used by these five special status bird species that were determined to use portions of the project site for breeding and/or roosting. The project also would result in approximately 5.7 acres of direct permanent impacts to USFWS-designated critical habitat for least Bell's vireo, of which approximately 0.52 acre are to wetland or riparian habitats that are potentially suitable habitat for vireo.
Project impacts to special status animal species would require mitigation, as well as a Federal Endangered Species Act Section 7 consultation with the USFWS and Fish and Game Code Section 2080 Incidental Take Permit with the CDFW. Implementation of mitigation measures BIO-1 and BIO-2 below (along with mitigation measure BIO-4 for direct habitat loss) would avoid or substantially lessen direct impacts to special status animal species, including Cooper's hawk, least Bell's vireo, white-tailed kite, yellow-breasted chat, and yellow warbler because trimming, grubbing, and clearing of habitat for these species during the breeding season would be avoided if feasible, and if not feasible, then pre-construction nesting surveys would be conducted to determine if active nests of these five special status species are present and any detected active nests of these species would be protected through incorporation of identified buffer distances. Impacts to designated critical habitat for least Bell's vireo would be avoided or substantially lessened through mitigation for riparian habitat loss and special conditions as determined through consultation with the USFWS during the CWA 404 permitting process.

- BIO-1 If feasible, no trimming, grubbing, or clearing of riparian trees or vegetation shall occur during the breeding season for the least Bell's vireo (March 15-September 15), yellow-breasted chat and yellow warbler (February 15-August 31), or raptors (January 15-July 15). If riparian tree and vegetation trimming, clearing, or grubbing cannot feasibly occur outside of these breeding seasons, then pre-construction nesting surveys, as described below, shall be conducted by a qualified biologist prior to initiating vegetation trimming, clearing, or grubbing activities. The vireo nesting survey shall consist of three surveys spaced seven to ten days apart, with the final survey occurring no more than three days prior to initiating trimming, clearing, or grubbing activities. If nesting vireos are detected during the pre-construction surveys on or within 500 feet of planned clearing or grubbing activities, then clearing or grubbing on or within 500 feet of the nesting vireos shall be postponed until a qualified biologist determines that the young have fledged or the nest is no longer active. The nesting survey for yellow-breasted chat, yellow warbler, and raptors shall consist of one pre-construction nesting survey conducted no more than seven days prior to the commencement of vegetation trimming, clearing, or grubbing to determine if active nests of these species are present in the affected areas. If nesting yellow-breasted chat, yellow warbler, or raptors are detected on or within 300 feet of the impact area during pre-construction surveys, construction on or within 300 feet of the nest shall be postponed until after the young have fledged or the nest is no longer active. The qualified biologist conducting the survey(s) 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 experience conducting biological field surveys, including surveys for nesting birds.
- **BIO-2** Mitigation for direct permanent impacts to 0.52 acre of riparian habitat, which is located within USFWS critical habitat for least Bell's vireo, including 0.48 acre of southern riparian forest, 0.04 acre of southern willow scrub, and less than 0.01 acre of mule fat scrub, would be addressed through Section 7 consultation as part of the CWA 404 permitting process and the Fish and Game Code Section 2080 Incidental Taker Permit (if required). The results of the Section 7 consultation and conditions of the Incidental Take Permit (if required) would determine the need, if any, for special conditions or habitat mitigation beyond the mitigation identified for impacts to

riparian habitat in BIO-4. As described in BIO-4, direct permanent impacts to southern riparian forest and southern willow scrub would be mitigated at a 3:1 ratio and mule fat scrub would be mitigated at a 2:1 ratio through one or more of the following, as determined through resource agency consultation: on- and/or off-site restoration, enhancement, and/or establishment/re-establishment with an establishment/re-establishment ratio of 1:1, or purchase of credits at an approved mitigation bank.

Additionally, indirect, short-term impacts to these special status animal species could occur during project construction due to construction-related noise from such sources as clearing, grubbing, and grading. Nesting special status bird species can be adversely affected by construction noise levels that exceed a level of 60 dBA L_{EQ} hourly average or ambient (whichever is greater). Implementation of mitigation measure BIO-3 below would avoid or substantially lessen indirect impacts to special status animal species, including Cooper's hawk, least Bell's vireo, white-tailed kite, yellow-breasted chat, and yellow warbler by avoiding the operation of construction equipment during breeding seasons for the five special status species, or if avoidance is not feasible, then through performance of pre-construction nesting surveys to determine if active nests of these five special status species are present. If they are, then active nests would be protected from adverse construction noise levels through postponement of construction activity within specified distances of active nests or installation of temporary noise barriers.

BIO-3 If feasible, operation of construction equipment (e.g. backhoes, loaders, bulldozers, excavators, skid steers, graders) shall not occur during the breeding seasons for the least Bell's vireo (March 15-September 15), yellow warbler and yellow-breasted chat (February 15-August 31), or nesting raptors (January 15-July 15). If it is not feasible to avoid operation of construction equipment during any of these breeding seasons then one pre-construction survey shall be conducted by a qualified biologist no more than seven days prior to the start of construction to determine if active nests of these species are present within the areas potentially impacted by noise. The "noise impact area" is defined as up to 500 feet from the noise source for least Bell's vireo and up to 300 feet from the noise source for yellow warbler, yellow-breasted chat, and raptors. The pre-construction survey can either be combined with or conducted separately from surveys conducted for Measure BIO-1. If it is determined at the completion of the pre-construction survey that active nests belonging to least Bell's vireo, yellow warbler, yellow-breasted chat, or raptors are absent from the noise impact area, construction shall be allowed to proceed. If the pre-construction survey determines the presence of active nests belonging to any of these sensitive species, then construction shall either: (1) be postponed within the noise impact area until a qualified biologist determines any nests are no longer active or until after the respective breeding season; or (2) not occur until a temporary noise barrier or berm is constructed at the edge of the construction limits and/or around the piece of equipment to ensure that noise levels within the noise impact area are reduced to below one-hour average of 60 dBA or ambient, whichever is greater. Decibel output will be confirmed by a qualified noise specialist and intermittent monitoring by a qualified biologist will be required to ensure that conditions have not changed. The qualified biologist conducting the survey(s) 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 experience conducting biological field surveys, including surveys for nesting birds.

With implementation of measures BIO-1 and BIO-2 for direct impacts and BIO-3 for indirect noise impacts, the proposed project would not result in a substantial adverse effect, directly or through habitat modifications, on species identified as a candidate, sensitive, or special status species. This impact is less than significant with mitigation incorporated.

b. Would the project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant With Mitigation Incorporated. The BSA encompasses approximately 81 acres and consists of ornamental, disturbed, and developed lands associated with the golf course and existing roads; riparian habitats along the San Diego River corridor; and small patches of native and naturalized upland habitats. Ornamental vegetation is the most prevalent habitat type in the BSA within the golf course, while riparian forest is dominant along the San Diego River. Native habitats within the BSA are associated primary with the San Diego River, which supports a riparian corridor that is constrained by development on both sides, including the golf course, SR-52 and other roadways, and single-family residential development.

A total of 13 vegetation communities or land use types were mapped within the BSA, including southern riparian forest (including disturbed and burned), southern willow scrub, mule fat scrub, freshwater marsh, disturbed wetland, open water, disturbed Diegan coastal sage scrub, broom baccharis-dominated sage scrub, flat-topped buckwheat scrub, non-native grassland, ornamental, disturbed habitat, and developed lands. Of these, all but ornamental, disturbed habitat, and developed lands are considered sensitive vegetation communities. Table 2 summarizes the vegetation communities and acreages within the BSA.

Table 2				
EXISTING VEGETATION COMMUNITIES/LAND USE TYPES				
Vegetation Community/Land Use Type	Acreage			
Southern Riparian Forest (including disturbed and burned)	29.14			
Southern Willow Scrub	1.10			
Mule Fat Scrub	0.51			
Freshwater Marsh	0.54			
Disturbed Wetland	0.01			
Open Water	0.52			
Diegan Coastal Sage Scrub - disturbed	0.13			
Broom Baccharis-dominated Sage Scrub	0.06			
Flat-topped Buckwheat Scrub	0.16			
Non-native Grassland	0.15			
Ornamental	29.22			
Disturbed Habitat	15.47			
Developed	3.93			
TOTAL	80.94			

Source: Appendix C

Direct Project Impacts

Direct impacts from project implementation would include temporary impacts and permanent 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 the proposed project.

Direct project impacts (temporary and permanent) would occur to seven sensitive vegetation communities in the BSA, including southern riparian forest, southern willow scrub, mule fat scrub, freshwater marsh, flat-topped buckwheat scrub, broom baccharis-dominated sage scrub, and non-native grassland, as summarized in Table 3. The amount would vary depending on the option for the connection to West Hills Parkway at the west end of the bike path and access during project construction. As discussed in Section 2.0 of this IS/MND, there are three options being considered for the connection to West Hills Parkway, including the Switchback Ramp Option, Curvilinear Ramp Option, and Linear Ramp Option (refer to Figure 3a). Construction access potentially may be provided via a Padre Dam Municipal Water District utility easement along the eastern boundary of the golf course; construction access along this potential route could result in direct temporary impacts. Construction access could also be provided from West Hills Parkway and/or from the parking lot at Mast Park. Direct temporary impacts associated with construction access from West Hills Parkway and Mast Park were analyzed as part of the temporary impact analysis for the Switchback Ramp Option, Curvilinear Ramp Option, and Linear Ramp Option.

Switchback Ramp and Curvilinear Ramp Options

The Switchback Ramp and Curvilinear Ramp Options would result in direct permanent impacts to approximately 0.59 acre of sensitive vegetation communities, including 0.50 acre of southern riparian forest (including disturbed and burned), 0.04 acre of southern willow scrub, 0.004 acre

of mule fat scrub, 0.003 acre of freshwater marsh, 0.03 acre of flat-topped buckwheat scrub, and 0.01 acre of non-native grassland.

The Switchback Ramp and Curvilinear Ramp Options also would result in direct temporary impacts to approximately 2.78 acres of sensitive vegetation communities, including 2.08 acres of southern riparian forest (including disturbed and burned), 0.44 acre of southern willow scrub, 0.03 acre of mule fat scrub, 0.04 acre of freshwater marsh, 0.01 acre of broom baccharis-dominated sage scrub, 0.13 acre of flat-topped buckwheat scrub, and 0.05 acre of non-native grassland.

Linear Ramp Option

Direct permanent impacts to sensitive vegetation communities under the Linear Ramp Option would result in 0.12 acre of additional impacts to flat-topped buckwheat scrub and 0.02 acre of additional impacts to broom baccharis-dominated sage scrub relative to the Switchback Ramp and Curvilinear Ramp Options.

Direct temporary impacts to sensitive vegetation communities under the Linear Ramp Option would result in 0.12 acre fewer impacts to flat-topped buckwheat scrub and 0.03 acre of additional impacts to broom baccharis-dominated sage scrub relative to the Switchback Ramp and Curvilinear Ramp Options.

Padre Dam Easement Construction Access

If the proposed project includes construction access along this utility easement, it would not result in any additional direct permanent impacts; only direct temporary impacts would differ. Direct temporary impacts to sensitive vegetation communities if the Padre Dam Easement is used for construction access would include: 0.01 acre of additional impacts to southern willow scrub and 0.06 acre of additional impacts to mule fat scrub. These additional direct temporary impacts would not occur if this utility easement is not used for construction access.

SUMMARY OF PROJECT IMPACTS – SENSITIVE VEGETATION COMMUNITIES (acres) ¹								
				Impact A	creages			
Vegetation Community	Pro Switchb Op	ject + ack Ramp otion	Proj Curvilino Op	ect + ear Ramp tion	Project Ramp	+ Linear Option	Padre Easen Constru Acce	Dam nent uction ess
	Т	Р	Т	Р	Т	Р	Т	Р
Southern Riparian Forest (including disturbed and burned)	2.08	0.50	2.08	0.50	2.08	0.50	0	-
Southern Willow Scrub	0.44	0.04	0.44	0.04	0.44	0.04	0.01	-
Mule Fat Scrub	0.03	< 0.01	0.03	< 0.01	0.03	< 0.01	0.06	-
Freshwater Marsh	0.04	< 0.01	0.04	< 0.01	0.04	< 0.01	0	-
Disturbed Wetland	0	0	0	0	0	0	0	-
Open Water	0	0	0	0	0	0	0	-
Diegan Coastal Sage Scrub – disturbed	0	0	0	0	0	0	0	-
Flat-topped Buckwheat Scrub	0.13	0.03	0.13	0.03	0.01	0.15	0	-
Broom Baccharis - dominated Sage Scrub	0.01	0	0.01	0	0.04	0.02	0	-
Non-native Grassland	0.05	0.01	0.05	0.01	0.05	0.01	0	-
TOTAL	2.78	0.59	2.78	0.59	2.69	0.73	0.07	-

Table 3

Source: Appendix C

Rounded to the nearest 0.01; thus, totals reflect rounding

T = temporary impacts: P = permanent impacts

The proposed project would result in temporary and permanent impacts to sensitive vegetation communities including southern riparian forest, southern willow scrub, mule fat scrub, freshwater marsh, flat-topped buckwheat scrub, and broom baccharis dominated-sage scrub.

Although non-native grassland is a sensitive vegetation community, direct project impacts to non-native grassland are not considered significant because (1) areas of non-native grassland that would be temporarily impacted by the project would be revegetated with a native grassland forb palette for erosion control, and (2) permanent impacts to 0.01 acre of non-native grassland are considered *de minimis* and mitigation is not proposed.

Proposed mitigation requirements for project impacts to sensitive vegetation communities would vary, depending on the option selected for the West Hills Parkway connection and whether the Padre Dam easement construction access is utilized, as shown in Tables 4, 5, and 6. However, implementation of mitigation measures BIO-4 through BIO-6 below would avoid or substantially lessen direct impacts to sensitive vegetation communities because the project would compensate for the loss of riparian habitat and sensitive vegetation communities through habitat restoration, enhancement, preservation, and/or establishment/re-establishment in consultation with the resource agencies. The mitigation ratios presented below are subject to approval by the resource agencies.

- **BIO-4** Direct temporary impacts to southern riparian forest, southern willow scrub, mule fat scrub, and freshwater marsh would be mitigated on site at a 1:1 ratio through one or more of the following as determined through resource agency consultation: restoration, enhancement, preservation, and/or establishment/re-establishment. Direct permanent impacts to southern riparian forest, southern willow scrub, and freshwater marsh would be mitigated at a 3:1 ratio and mule fat scrub would be mitigated at a 2:1 ratio through one or more of the following as determined through resource agency consultation: on-and/or off-site restoration, enhancement, and/or establishment/re-establishment with an establishment/re-establishment ratio of 1:1, or purchase of credits at an approved mitigation bank.
- **BIO-5** Direct temporary impacts to flat-topped buckwheat scrub and broom baccharisdominated sage scrub would be mitigated on site at a 1:1 ratio through one or more of the following as determined through resource agency consultation: restoration, enhancement, or preservation. Temporarily impacted areas would be revegetated with a Diegan coastal sage scrub plant palette. Mitigation for direct permanent impacts to flattopped buckwheat scrub and broom baccharis-dominated sage scrub would occur at a 1:1 ratio through one or more of the following as determined through resource agency consultation: on- and/or off-site restoration, enhancement, preservation, or purchase of credits at an approved mitigation bank.
- **BIO-6** Whenever feasible, native vegetation shall be trimmed to the ground surface rather than uprooted.

Table 4 PROPOSED MITIGATION REQUIREMENTS FOR IMPACTS TO SENSITIVE VEGETATION COMMUNITIES -SWITCHBACK RAMP OR CURVILINEAR RAMP OPTIONS

Vegetation Community	Impact Acreage ¹	Mitigation Ratio	Proposed Mitigation ¹
Temporary Impacts			
Southern Riparian Forest	2.08	1:1	2.08
Southern Willow Scrub	0.44	1:1	0.44
Mule Fat Scrub	0.03	1:1	0.03
Freshwater Marsh	0.04	1:1	0.04
Flat-topped Buckwheat Scrub	0.13	1:1	0.13
Broom Baccharis dominated Sage Scrub	0.01	1:1	0.01
Non-native Grassland	0.05	-	0^2
Total Temporary	2.78		2.73
Permanent Impacts			
Southern Riparian Forest	0.50	3:1	1.50
Southern Willow Scrub	0.04	3:1	0.12
Mule Fat Scrub	< 0.01	2:1	0.01
Freshwater Marsh	< 0.01	3:1	0.01
Flat-topped Buckwheat Scrub	0.03	1:1	0.03
Broom Baccharis dominated Sage Scrub	0		0
Non-native Grassland	0.01	1:1	0^3
Total Permanent	0.59		1.67

Source: Appendix C

¹Rounded to the nearest hundredth acre; totals reflect rounding.

² No mitigation for temporary impacts to non-native grassland would be required, as all areas of non-native grassland that would be temporarily impacted by the proposed project would be revegetated with a native grassland and forb palette as an erosion control measure.

³ Permanent impacts to 0.01 acre of non-native grassland are considered de minimis and mitigation is not proposed.

Table 5 PROPOSED MITIGATION REQUIREMENTS FOR IMPACTS TO SENSITIVE VEGETATION COMMUNITIES -LINEAR RAMP OPTION

Vegetation Community	Impact Acreage ¹	Mitigation Ratio	Proposed Mitigation ¹
Temporary Impacts			
Southern Riparian Forest	2.08	1:1	2.08
Southern Willow Scrub	0.44	1:1	0.44
Mule Fat Scrub	0.03	1:1	0.03
Freshwater Marsh	0.04	1:1	0.04
Flat-topped Buckwheat Scrub	0.01	1:1	0.01
Broom Baccharis dominated Sage Scrub	0.04	1:1	0.04
Non-native Grassland	0.05	-	0^2
Total Temporary	2.69		2.64
Permanent Impacts			
Southern Riparian Forest	0.50	3:1	1.50
Southern Willow Scrub	0.04	3:1	0.12
Mule Fat Scrub	< 0.01	2:1	0.02
Freshwater Marsh	< 0.01	3:1	0.01
Flat-topped Buckwheat Scrub	0.15	1:1	0.15
Broom Baccharis dominated Sage Scrub	0.02	1:1	0.02
Non-native Grassland	0.01	1:1	0^{3}
Total Permanent	0.73		1.82

Source: Appendix C

¹Rounded to the nearest hundredth acre; totals reflect rounding.

² No mitigation for temporary impacts to non-native grassland would be required, as all areas of non-native grassland that would be temporarily impacted by the proposed project would be revegetated with a native grassland and forb palette as an erosion control measure.

³ Permanent impacts to 0.01 acre of non-native grassland are considered de minimis and mitigation is not proposed.

Table 6 PROPOSED MITIGATION REQUIREMENTS FOR IMPACTS TO SENSITIVEVEGETATION COMMUNITIES -PADRE DAM EASEMENT CONSTRUCTION ACCESS

Vegetation Community	Impact Acreage ¹	Mitigation Ratio	Proposed Mitigation ¹
Temporary Impacts			
Southern Willow Scrub	0.01	1:1	0.01
Mule Fat Scrub	0.06	1:1	0.06
Total Temporary	0.07		0.07

Source: Appendix C

¹Rounded to the nearest hundredth acre; totals reflect rounding.

Indirect Project Impacts

Indirect impacts are actions that are not a direct result of the proposed project, but affect biological resources either as a secondary effect of the direct impacts (e.g., construction noise, runoff, nighttime lighting, fugitive dust, etc.) or as the cause of degradation of a biological resource over time (e.g., edge effects).

Potential indirect impacts to sensitive vegetation communities resulting from project implementation could include increases in human activity in the area, colonization of invasive species, and accidental incursions during construction activities. Increases in human activity resulting from the proposed project are not expected to result in adverse effects on adjacent sensitive habitat because the project proposes to install permanent fencing to clearly define the boundaries of the bike path, and it would be of sufficient width to accommodate two-way bicycle/pedestrian traffic. Although the BSA already contains a variety of non-native species, including many invasive species, and project implementation is not anticipated to increase colonization by non-native plants, invasive plants have the potential to spread from developed or disturbed areas to adjacent native areas. During construction, there is potential to inadvertently encroach into sensitive habitat beyond the grading footprint and/or access routes in areas where construction activities would occur adjacent to sensitive habitat.

Implementation of mitigation measures BIO-7 through BIO-10 below would avoid or substantially lessen indirect impacts to sensitive vegetation communities associated with invasive species and accidental incursion through exclusion of invasive plant species for landscaping, erosion control, and revegetation efforts; oversight of regulatory compliance and project-specific requirements by a qualified biologist during project construction; and installation of temporary construction fencing to demarcate impact areas and protect adjacent sensitive habitat.

- **BIO-7** The project landscape/erosion control plans shall not include invasive species (as listed in the California Invasive Plant Council (Cal-IPC) Invasive Plant Inventory [Cal-IPC 2006, or as updated]. The project landscape/erosion control plans shall not include invasive species (as listed in the Cal-IPC). Native plant species shall be used in all revegetation and landscaping areas outside of the existing golf course. Native or non-invasive ornamental plant species shall be used for landscaping and revegetation within the existing golf course.
- **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.
- **BIO-9** Sensitive vegetation communities, jurisdictional waters and wetlands, and other sensitive biological resources located outside of permanent and temporary impact areas shall be identified on the final construction plans as "environmentally sensitive areas" and protected with temporary fencing (e.g., orange snow fence). A qualified biologist shall monitor the installation of the temporary fencing and ensure it is

installed prior to the start of construction. A qualified biologist shall regularly inspect the temporary fencing to ensure it remains in place throughout construction.

BIO-10 SANDAG shall prepare a revegetation plan showing how Aall 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.

The implementation of measures BIO-4 through BIO-6 for direct impacts and BIO-7 through BIO-10 for indirect impacts would ensure that the proposed project would not result in a substantial adverse effect on riparian habitat or another sensitive natural community. This impact is less than significant with mitigation incorporated.

c. Would the project have a substantial adverse effect on federally or state protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) or Section 1600 *et seq.* of the California Fish and Game Code through direct removal, filling, hydrological interruption, or other means?

Less Than Significant With Mitigation Incorporated. Direct permanent impacts to potential USACE jurisdictional areas resulting from the project (under any of the West Hills Parkway connection options) total approximately 0.03 acre, consisting of 0.01 acre of southern riparian forest, 0.01 acre of southern willow scrub, 0.003 acre of freshwater marsh, and 0.005 acre of ephemeral stream. Direct temporary impacts to potential USACE jurisdictional areas resulting from the project (under any of the West Hills Parkway connection options) would total approximately 0.18 acre, consisting of 0.12 acre of southern riparian forest, 0.01 acre of southern willow scrub, 0.04 acre of freshwater marsh, and 0.01 acre of ephemeral stream (non-wetland Waters of the U.S. [WUS]).

Use of the Padre Dam Utility Easement for construction access would not result in additional direct temporary impacts to WUS and no additional permanent impacts.

Direct permanent impacts to potential CDFW jurisdictional areas resulting from the project (under any of the West Hills Parkway connection options) total approximately 0.55 acre, consisting of 0.50 acre of southern riparian forest, 0.04 acre of southern willow scrub, 0.004 acre of mule fat scrub, 0.003 acre of freshwater marsh, and 0.001 acre of streambed. Direct temporary impacts to potential CDFW jurisdictional areas resulting from the project (under any of the West Hills Parkway connection options) would total approximately 2.59 acres, consisting of 2.08 acres of southern riparian forest, 0.44 acre of southern willow scrub, 0.03 acre of mule fat scrub, 0.003 acre of streambed.

Use of the Padre Dam Utility Easement for construction access would result in additional direct temporary impacts to approximately 0.07 acre of wetland and riparian habitat (0.01 acre of southern willow scrub and 0.06 acre of mule fat scrub) and no additional permanent impacts.

Project impacts to potential USACE and CDFW jurisdictional areas are summarized in Table 7.

SUMMAR	Y OF PRO	JECT IMP	Table ACTS – PC (acres	7 DTENTIAL	JURISDIC	CTIONAL A	AREAS	
				Impact A	araagas			
Vegetation Community	Proj Switchba Op	ject + ack Ramp otion	Proj Curviline Op	ect + ear Ramp tion	Project Ramp	+ Linear Option	Padre Easer Constr Acc	Dam nent uction cess
	Т	Р	Т	Р	Т	Р	Т	P
		USA	CE Jurisdic	tional Area:	S			
Wetland Waters of the	U.S.			-				
Southern Riparian Scrub (including disturbed and burned)	0.12	0.01	0.12	0.01	0.12	0.01	0	-
Southern Willow Scrub	0.01	0.01	0.01	0.01	0.01	0.01	0	-
Freshwater Marsh	0.04	< 0.01	0.04	< 0.01	0.04	< 0.01	0	-
Subtotal	0.17	0.02	0.17	0.02	0.17	0.02	0	
Non-wetland Waters of	the U.S.	•						•
Ephemeral Stream	0.01	< 0.01	0.01	< 0.01	0.01	< 0.01	0	-
Subtotal	0.01	<0.01	0.01	<0.01	0.01	<0.01	0	-
TOTAL USACE	0.18	0.03	0.18	0.03	0.18	0.03	0	-
		CDF	W Jurisdic	tional Area	S			
Riparian/Wetland Hab	itat							
Southern Riparian Scrub (including disturbed and burned)	2.08	0.50	2.08	0.50	2.08	0.50	0	-
Southern Willow Scrub	0.44	0.04	0.44	0.04	0.44	0.04	0.01	-
Mule Fat Scrub	0.03	< 0.01	0.03	< 0.01	0.03	< 0.01	0.06	-
Freshwater Marsh	0.04	< 0.01	0.04	< 0.01	0.04	< 0.01		-
Subtotal	2.59	0.55	2.59	0.55	2.59	0.55	0.07	-
Stream Channel/Unveg	etated Hal	bitat			•			1
Streambed	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	0	
Subtotal	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	0	
TOTAL CDFW	2.59	0.55	2.59	0.55	2.59	0.55	0.07	-

Source: Appendix C

¹ Rounded to the nearest 0.01; thus, totals reflect rounding

T = temporary impacts: P = permanent impacts

Project impacts to potential jurisdictional areas would require compensatory mitigation, which will be determined during consultation with the regulatory agencies, as well as a federal CWA Section 404 Permit from the USACE, and a Section 401 Water Quality Certification from the State Water Resources Control Board (SWRCB)/RWQCB, and a 1602 Streambed Alteration Agreement from the CDFW. Proposed mitigation ratios and corresponding acreages for impacts to potential USACE and CDFW jurisdictional areas (under any of the West Hills Parkway

connection options) are presented in Tables 8 and 9, respectively. Implementation of mitigation measure BIO-11, identified below, would avoid or substantially lessen impacts to potential jurisdictional areas because impacted jurisdictional areas would be compensated to achieve a no net loss of wetlands through on- and/or off-site restoration, enhancement, preservation, and/or establishment/re-establishment in consultation with the resource agencies. The mitigation ratios presented below are subject to approval by the resource agencies.

BIO-11 Direct temporary impacts to southern riparian forest, southern willow scrub, mule fat scrub, and freshwater marsh would be mitigated on site at a 1:1 ratio through one or more of the following as determined through resource agency consultation: restoration, enhancement, preservation, and/or establishment/re-establishment. Direct temporary impacts to non-wetland WUS/CDFW streambed would occur through returning these areas to their pre-construction contours and conditions. Direct permanent impacts to southern riparian forest, southern willow scrub, and freshwater marsh would be mitigated at a 3:1 ratio and mule fat scrub would be mitigated at a 2:1 ratio through one or more of the following as determined through resource agency consultation: on-and/or off-site restoration, enhancement, and/or establishment/re-establishment with an establishment/re-establishment ratio of 1:1, or purchase of credits at an approved mitigation bank. Direct permanent impacts to non-wetland WUS/CDFW streambed would occur at a 1:1 ratio through one or more of the following one or more of the following as determined through resource agency consultation: on-and/or off-site restoration, enhancement, and/or establishment/re-establishment with an establishment/re-establishment ratio of 1:1, or purchase of credits at an approved mitigation bank. Direct permanent impacts to non-wetland WUS/CDFW streambed would occur at a 1:1 ratio through one or more of the following as determined through resource agency consultation: on- and/or off-site restoration; on- and/or off-site restoration, enhancement, and/or establishment/re-establishment with an establishment/re-establishment ratio of 1:1, or purchase of credits at an approved mitigation bank. Direct permanent impacts to non-wetland WUS/CDFW streambed would occur at a 1:1 ratio through one or more of the following as determined through resource agency consultation: on- and/or off-site restoration, enhancement, and/or establishment/re-establishment.

Vegetation Community	Impact Acreage ¹	Impact Acreage ¹ Mitigation Ratio				
Temporary Impacts						
Wetland Waters of the U.S.						
Southern Riparian Forest	0.12	1:1	0.12			
Southern Willow Scrub	0.01	1:1	0.01			
Freshwater Marsh	0.04	1:1	0.04			
Subtotal	0.17		0.17			
Non-wetland Waters of the U.S.						
Ephemeral Stream	0.01	1:1	0.01			
Subtotal	0.01		0.01			
Total Temporary	0.18		0.18			
Permanent Impacts						
Wetland Waters of the U.S.						
Southern Riparian Forest	0.01	3:1	0.03			
Southern Willow Scrub	0.01	3:1	0.03			
Freshwater Marsh	< 0.01	3:1	0.01			
Subtotal	0.02		0.07			
Non-wetland Waters of the U.S.						
Ephemeral Stream	< 0.01	1:1	< 0.01			
Subtotal	<0.01		<0.01			
Total Permanent	0.03		0.07			

Table 8PROPOSED MITIGATION REQUIREMENTS FOR IMPACTSTO POTENTIAL USACE JURISDICTIONAL AREAS

Source: Appendix C

¹Rounded to the nearest hundredth acre; totals reflect rounding.

TO TOTE (THAT ODE W JOKISDIC HONAL HADITATS						
Vegetation Community	Impact Acreage ¹	Mitigation Ratio	Proposed Mitigation ¹			
Temporary Impacts						
Riparian/Wetland Habitat						
Southern Riparian Forest	2.08	1:1	2.08			
Southern Willow Scrub	0.44	1:1	0.44			
Mule Fat Scrub	0.03	1:1	0.03			
Freshwater Marsh	0.04	1:1	0.04			
Subtotal	2.59		2.59			
Stream Channel/Unvegetated Habitat						
Streambed	< 0.01	1:1	< 0.01			
Subtotal	<0.01		<0.01			
Total Temporary	2.59		2.59			
Permanent Impacts						
Riparian/Wetland Habitat						
Southern Riparian Forest	0.50	3:1	1.50			
Southern Willow Scrub	0.04	3:1	0.12			
Mule Fat Scrub	< 0.01	2:1	0.01			
Freshwater Marsh	< 0.01	3:1	0.01			
Subtotal	0.55		1.64			
Stream Channel/Unvegetated Habitat						
Streambed	< 0.01		< 0.01			
Subtotal	<0.01		<0.01			
Total Permanent	0.55		1.65			

Table 9 PROPOSED MITIGATION REQUIREMENTS FOR IMPACTS TO POTENTIAL CDFW JURISDICTIONAL HABITATS

Source: Appendix C

¹Rounded to the nearest hundredth acre; totals reflect rounding.

With the implementation of measure BIO-11 the proposed project would not have a substantial adverse effect on federally or state protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) or Section 1600 et seq. of the California Fish and Game Code through direct removal, filling, hydrological interruption, or other means. This impact is less than significant with mitigation incorporated.

d. Would the project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant With Mitigation Incorporated. The project site is located adjacent to the San Diego River, which functions as a wildlife corridor within the BSA, facilitating movement of wildlife between Mission Trails Regional Park to the west and Mast Park and other areas further to the east of the BSA. The proposed project would traverse the City of San Diego's Multiple Habitat Planning Area (MHPA) biological preserve. The MHPA is intended to link all core biological areas into a regional open space. This portion of the MHPA within the BSA is part of a large contiguous MHPA area that encompasses the San Diego River corridor and adjacent Mission Trails Regional Park. In addition, most of the project is located in USFWS-designated critical habitat for the federal and state listed least Bell's vireo.

The project, however, would not interfere with the function of the San Diego River corridor or the MHPA as a wildlife corridor and would not constrain east-west wildlife movement through the area. The project would be constructed on, or adjacent to, an existing berm paralleling the southern edge of the golf course and the northern edge of the San Diego River, and portions of the project east of the golf course would be constructed along an existing dirt trail that already traverses this habitat. The proposed project would not cross the San Diego River or otherwise physically disrupt the existing habitat corridor along the San Diego River.

A few short sections in select areas on the north side of the project alignment adjacent to the golf course may be fenced with protective safety fence where it is most likely trail users would benefit from protection from airborne golf balls. All other fencing along the edges of the bike path would allow passage of wildlife within the corridor and would not create barriers to wildlife movement. Wildlife movement through this area is primarily in an east-west direction, as wildlife movement south of the river is already constrained by SR-52 and residential development, and wildlife movement north of the river is already constrained by the golf course, residential and commercial development, and roadways.

Nesting birds within the project area are protected under the Migratory Bird Treaty Act (MBTA). Project construction could result in potential direct and indirect impacts to birds protected under the MBTA. Indirect effects could occur due to noise generated from project construction equipment, which could disturb the migratory birds. Direct effects could occur as the project requires the removal of vegetation. Therefore, the proposed project could potentially interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. Implementation of mitigation measure BIO-12 would avoid or substantially lessen impacts to migratory nesting birds through pre-construction nesting surveys and protection of detected active nests.

BIO-12 If feasible, no trimming, grubbing, or clearing of vegetation shall occur during the general avian breeding season (February 15-August 31). If vegetation trimming, grubbing, or clearing cannot feasibly occur outside of the general avian breeding season, then one pre-construction survey shall be conducted by a qualified biologist no more than seven days prior to the commencement of the vegetation trimming, grubbing to determine if active bird nests are present in the affected areas. The preconstruction survey can either be combined with or conducted separately from surveys conducted for Measure BIO-1. Should an active migratory bird nest be located, the project biologist would direct vegetation clearing away from the nest until a qualified biologist determines that the young have fledged or the nest has failed. If there are no nesting birds (includes nest building or other breeding/nesting behavior) within this area, trimming, clearing, and grubbing shall be allowed to proceed. The qualified biologist conducting the survey(s) 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 experience conducting biological field surveys, including surveys for nesting birds.

With the implementation of measure BIO-12 the proposed project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or

with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites. This impact is less than significant with mitigation incorporated.

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Less Than Significant Impact. The City of San Diego's Environmentally Sensitive Lands (ESL) Regulations (Chapter 14, Article 3, Division 1 of the San Diego Municipal Code; City of San Diego 2016a) contain specific development regulations to protect, preserve and, where damaged, restore the environmentally sensitive lands in the City of San Diego and the viability of the species supported by those lands. These regulations address the protection of sensitive biological resources. The ESL regulations also serve to implement the MSCP by placing priority on the preservation of biological resources within the MHPA. Exceptions to the ESL regulations are provided for certain types of development activities in Section 143.0111. Specifically, public linear trail projects are exempt from development area regulations for sensitive biological resources.

The ESL Regulations for sensitive biological resources (Section 143.0141 of the San Diego Municipal Code) require a site-specific impact analysis for all development that would occur in sensitive biological resources. Consistent with that section, a Biological Technical Report (Appendix C) and Jurisdictional Delineation Report (Appendix D) were prepared for the project to evaluate potential project impacts to sensitive biological resources. The ESL Regulations also require grading during the wildlife breeding seasons to be consistent with the requirements of the City of San Diego's MSCP Subarea Plan (City of San Diego 1997), which protects covered species from vegetation removal and construction activities within their respective breeding seasons. As discussed in Section 7.4(a), mitigation is proposed to protect sensitive species observed within the project area during vegetation clearing and grading, including pre-construction nesting surveys and maintaining appropriate buffer distances from active nests if detected, and through habitat modification to USFWS-designated critical habitat (mitigation measures BIO-1 through BIO-3).

Additionally, as discussed in Section 7.4(f), the proposed project would not conflict with the City of San Diego's MSCP Subarea Plan. The ESL Regulations require avoidance of narrow endemic species (as identified in the Biology Guidelines of the City of San Diego's Land Development Manual). The project would avoid all such narrow endemic species. Lastly, the ESL Regulations require that impacts to wetlands be avoided and call for coordination with the resource agencies (USACE, USFWS, and CDFW) on impact avoidance, minimization, and mitigation. The project has been designed to minimize impacts to wetlands and as discussed in Sections 7.4(b) and 7.4(c), impacts to wetland/riparian habitat would be mitigated in consultation with the resource agencies to achieve a no net loss to wetlands pursuant to mitigation measures BIO-4 and BIO-11. Therefore, the proposed project would not conflict with any local policies or ordinances protecting biological resources. This impact is less than significant.

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Less Than Significant Impact. The project alignment occurs partially within the boundaries of the City of San Diego's adopted MSCP Subarea Plan (City of San Diego 1997), and within portions of the City of San Diego's MHPA. The project also is partially within the boundaries of the City of Santee's MHPA pursuant to their draft MSCP Subarea Plan, which is not approved or adopted, and therefore is not discussed further herein. The MSCP is a comprehensive habitat-conservation planning program for southwestern San Diego County. A primary goal of the MSCP is to preserve a network of habitat and open space to protect biodiversity. Local jurisdictions implement their portions of the MSCP through subarea plans, which describe specific implementing mechanisms. The MHPA is the planned habitat preserve throughout the MSCP Subregional Plan study area. The MHPA is assembled as each participating jurisdiction implements their portion of the MSCP. The City of San Diego's MSCP Subarea Plan identifies a 56,831-acre MHPA for preservation of core biological resource areas and corridors targeted for preservation. The following discussion evaluates whether the proposed project would conflict with the City of San Diego's adopted MSCP Subarea Plan.

City of San Diego MSCP Subarea Plan

Per Section 1.4.1 of the City of San Diego MSCP Subarea Plan, passive recreation uses, which include trails, are allowed within the City's MHPA. General management directives are identified in the Subarea Plan within Section 1.5.2 that specifically pertain to trails. Public Access, Trails, and Recreation Management Directive 7 states that recreational uses should be limited to "passive uses, such as birdwatching, photography, and trail use." Other policies, design guidelines, and management directives applicable to the proposed project are contained in Sections 1.4.2 and 1.5.2 of the Subarea Plan. The following discussion evaluates whether the proposed project would conflict with these MSCP Subarea Plan guidelines.

- *General Planning Policies and Design Guidelines; Fencing, Lighting, and Signage 1* calls for fencing or other barriers to be used where it is determined to be the best method to achieve conservation goals and adjacent to land uses incompatible with the MHPA. This guideline specifically mentions split-rail fencing to direct public access to appropriate locations. Consistent with this guideline, the project proposes to install split-rail fencing along the project alignment to clearly define the boundaries of the bike path and direct users to remain within them.
- *General Planning Policies and Design Guidelines; Fencing, Lighting, and Signage 2* requires lighting to be designed to avoid intrusion into the MHPA and effects on wildlife, and lighting in areas of wildlife crossings to be of low sodium or similar lighting. It also limits signage to access and litter control and educational purposes. Consistent with these guidelines, project lighting would be shielded and directed towards the bike path and away from the San Diego River to avoid spillover onto the adjacent sensitive riparian habitat. Furthermore, proposed signage would consist of way-finding signage at the project's access points; the existing interpretive signage along the existing trail within Mast Park West would not be affected and would remain in place.

- *General Management Directives; Public Access, Trails, and Recreation 1* calls for barriers such as fencing to protect sensitive areas. As discussed above and consistent with this guideline, the project proposes to install split-rail fencing along the project alignment to clearly define the boundaries of the bike path and direct users to remain within them to protect adjacent sensitive habitat.
- *General Management Directives; Public Access, Trails, and Recreation 2* recommends locating trails along the edges of urban land uses adjacent to the MHPA and following existing dirt roads as much as possible rather than entering into habitat or wildlife movement areas. Consistent with this guideline, the project alignment would occur along an existing DG trail within Mast Park West and along and adjacent to an existing developed golf course. The project has been designed to minimize encroachments into sensitive habitat of the adjacent San Diego River corridor to the south (refer to Section 7.4[b]).
- General Management Directives; Public Access, Trails, and Recreation 3 recommends to in general, avoid paving trails unless management and monitoring evidence shows otherwise, clearly demarcate trails, and undertake measures to counter the effects of erosion. The project proposes to pave the bike path with a 10-foot-wide all-weather surface and 2-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 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 MHPA. For example, protected species observed within this area of the MHPA, such as least Bell's vireo within the adjacent San Diego River corridor, would not be directly affected by the proposed project and the introduction of a paved bike path would not threaten the viability of this species. As discussed in Section 7.4(a), mitigation is proposed 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 proposed 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). The existing berm would be improved by expanding, rebuilding, and/or reinforcing areas necessary to support the proposed bike path, and slope protection or similar measures to control erosion would be installed at locations where erosion is evident. As previously stated, the project proposes to install split-rail fencing along the project alignment to clearly define the boundaries of the bike path and direct users to remain within them to protect adjacent sensitive habitat. Thus, the proposed project would not conflict with this management directive.
- General Management Directives; Public Access, Trails, and Recreation 4 calls to minimize trail widths to reduce impacts to critical resources and recommends a width of

four feet in core areas with exceptions necessary to safely accommodate multiple uses or disabled access. It also calls for trail fences to protect sensitive resources. The project proposes to construct a Class I facility along the same general alignment of an existing 8to 14-foot wide dirt trail within Mast Park West and an existing informal dirt trail on a berm within the Carlton Oaks Golf Course that is already in use. The proposed Class I facility would accommodate multiple users, which requires a 10-foot-wide trail and 2-foot-wide shoulders. The purpose of this design standard (Caltrans 2015) is to provide adequate width for safe two-way bicycle travel. As a multi-use path, the paved width and graded shoulders also are necessary to minimize conflicts between people walking and people riding bikes. This is especially important in the relatively remote setting of the proposed project where access for emergency responders is constrained. Impacts to sensitive resources have been minimized by siting the project alignment along an existing dirt trail within Mast Park West and mostly along, or adjacent to, an existing berm with a dirt trail in the southern portion of the golf course. The project has been designed to minimize encroachments into sensitive habitat of the adjacent San Diego River corridor to the south (refer to Section 7.4[b]). Within the eastern portion of the proposed alignment within Mast Park West, the bike path would be constructed mostly within the footprint of the existing dirt trail, and impacts to sensitive habitat adjacent to the existing trail due to the proposed bike path (which would be wider than the existing trail) would be minimal. For the portion of the project within the golf course, the widening of the existing berm would mostly occur on the north side (or golf course side) of the existing berm within the golf course. In addition, the project proposes to install split-rail fencing along the project alignment to clearly define the boundaries of the bike path and direct users to remain within them to protect adjacent sensitive habitat. Thus, the proposed project would not conflict with this management directive.

City of San Diego MHPA Land Use Adjacency Guidelines

While a portion of the project occurs within the City of San Diego's MHPA, other portions are adjacent to the MHPA and as such, the MSCP land use adjacency guidelines contained in the City of San Diego's MSCP Subarea Plan for drainage/water quality, lighting, noise, barriers (e.g., fencing), and invasive species are analyzed below.

The land use adjacency guidelines prohibit new development areas to drain directly into the MHPA. While the proposed project is not a new development area, the portion of the proposed project adjacent to the City of San Diego's MHPA would be designed to direct flows towards the golf course on the north side of the bike path and away from the MHPA and the San Diego River and its sensitive habitat. As discussed in Section 7.9(a), the proposed project is a bike path and would not collect pollutants that would adversely affect the water quality of storm water runoff. As further discussed in Section 7.9, the proposed project would not result in water quality impacts during construction.

Consistent with the MHPA land use adjacency guidelines, project lighting would be shielded and directed towards the bike path and away from the San Diego River to avoid spillover onto the adjacent riparian corridor and its habitats.

The MHPA land use adjacency guidelines require that excessively noisy uses or activities adjacent to breeding areas must incorporate noise reduction measures and be curtailed during the breeding season of sensitive species. Over the long-term, the proposed project would not meaningfully change noise levels within or adjacent to the MHPA. The project area is already used by people walking and biking along the existing trail and berm, and these activities would continue with project implementation. In addition, the project would be located next to an active existing golf course featuring people playing golf, walking, and driving golf carts. In addition, traffic noise from the adjacent State Route 52 is audible in the project area. Noise generated during the avian breeding season. Implementation of mitigation measures BIO-3 and BIO-12 would avoid or substantially lessen indirect impacts to nesting birds due to construction noise. Thus, the proposed project would be consistent with the MHPA land use adjacency guideline pertaining to noise.

The MHPA land use adjacency guidelines recommend barriers along the MHPA boundaries to direct public access to appropriate locations. Consistent with this guideline, the project proposes to install permanent split-rail fencing along the project alignment to clearly define the boundaries of the bike path and direct users to remain within them.

Lastly, the MHPA land use adjacency guidelines prohibit the introduction of invasive non-native plant species into areas adjacent to the MHPA. As discussed in Section 7.4(b), numerous non-native plant species already occur in the BSA and project implementation is not anticipated to increase colonization by non-native plants, particularly with implementation of mitigation measures BIO-7, BIO-8, and BIO-10 which would limit any new plants to non-invasive species and oversight of a biological monitor.

Conclusion

While SANDAG is not a signatory party to the MSCP, the proposed project would not conflict with provisions, policies, management directives, management guidelines, or land use adjacency guidelines contained in the City of San Diego's MSCP Subarea Plan. Therefore, the project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. This impact is less than significant.

7.5 <u>Cultural Resources</u>

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the proposed project:				
a. Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5?				
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?				
c. Cause a substantial adverse change in the significance of a Tribal Cultural Resource as defined in Public Resources Code 21074?				
d. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				
e. Disturb any human remains, including those interred outside of formal cemeteries?				

The following discussion is based on the Cultural Resources Technical Report and Paleontological Technical Memoranda completed for the project (Appendices E and F, respectively).

a. Would the project cause a substantial adverse change in the significance of a historical resource as defined in CEQA Guidelines §15064.5?

No Impact. The project area includes both the direct Area of Potential Effects (APE) and indirect APE. The direct APE includes the development footprint of the proposed project, which consists of all areas that would be permanently and temporarily impacted by project implementation. The indirect APE includes the total area comprised of all of the legal parcels that contain the direct APE. The direct APE encompasses approximately 17 acres and the indirect APE encompasses approximately 262 acres. To determine the potential presence of historical resources in the project area, a records search was conducted at the South Coastal Information Center at San Diego State University on November 17, 2016, and a pedestrian field survey of the direct and indirect APE was conducted by an archaeologist on November 22, 2016. The search area for the records search was defined as a one-mile radius around the indirect APE. The records search did not identify any previously recorded historical resources within the direct or indirect APE, but 12 were identified within the search area. These include four historic archaeological sites, two historic isolates, four historic resources, and two multi-component sites (both prehistoric and historic materials). None of these recorded historical sites would be affected by the proposed project. No historical resources were identified within the direct or indirect APE during the field survey. Consequently, the proposed project would not cause a substantial adverse change in the significance of a historical resource. There is no impact.

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Guidelines Section 15064.5?

Less Than Significant With Mitigation Incorporated. To determine the potential presence of archaeological resources in the project area, a records search and a pedestrian field survey of the direct and indirect APE were conducted, as described above in Section 7.5(a). The records search did not identify any previously recorded archaeological resources within the direct APE; however, six prehistoric cultural resources are recorded as being located within the indirect APE. None of these six occur adjacent to the direct APE; they are located at distances ranging from approximately 164 to 503 feet from the direct APE. Additionally, 54 previously identified archaeological resources have been documented outside the indirect APE, but within the one-mile search area. None of these previously identified archaeological resources would be affected by the proposed project. No new archaeological resources were identified within the direct or indirect APE during the field survey. No impacts to known archaeological resources would occur as a result of project implementation.

While the potential to encounter unknown subsurface archaeological resources is low due to the minimal depth of excavation (approximately 2.5 to 5 feet) within previously disturbed areas associated with the existing dirt trail, berm, and golf course, the project vicinity is considered sensitive for prehistoric archaeological sites based on the number or recorded resources within the indirect APE and one-mile search radius. Implementation of mitigation measure CUL-1 would avoid or substantially lessen potential impacts of the project related to undetected subsurface resources because construction personnel would receive cultural resource sensitivity training by an archaeologist so they would understand the laws and appropriate procedures to follow in the event of discovery during construction activities. Therefore, the proposed project would not cause a substantial adverse change in the significance of an archaeological resource if undetected subsurface archaeological resources are encountered during project construction. This impact is less than significant with mitigation incorporated.

CUL-1 Prior to the start of construction, a qualified archaeologist shall conduct cultural resources sensitivity training for all construction personnel. The training shall cover the types of cultural resources that might be encountered and the procedures to follow if cultural resources are inadvertently discovered during construction. The training shall include, but not be limited to, a discussion on the importance of, and the legal basis for, the protection of significant archaeological resources. All personnel shall sign that they understand the material presented and be issued a hard hat sticker, or a similar method, to verify completion of training. In addition, a qualified archaeologist shall be retained on an on-call basis to respond to any unanticipated discoveries.

c. Would the project cause a substantial adverse change in the significance of a Tribal Cultural Resource as defined in Public Resources Code 21074?

No Impact. In May 2016, SANDAG notified all California Native American tribes traditionally and culturally affiliated with the San Diego region of the proposed project in accordance with Assembly Bill (AB) 52 (Gatto, Statutes of 2014) requirements and none of the tribes requested a consultation. Additionally, no known tribal cultural resources or sites were identified within the direct APE during the records search and field survey, as discussed above in Sections 7.5(a)

and 7.5(b) (Appendix E). Therefore, the project would not cause a substantial adverse change in the significance of a Tribal Cultural Resource as defined in Public Resources Code 21074. There is no impact.

d. Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

No Impact. The proposed project is underlain by young alluvial deposits, which are assigned as having low paleontological resource sensitivity due to the relatively young age of the formation (Holocone era of less than 11,700 years old). A records search of the project site and a one-mile radius was conducted at the San Diego Natural History Museum, and records were reviewed from the University of California Museum of Paleontology database, the Natural History Museum of Los Angeles County Department of Invertebrate Paleontology, and the Paleobiology Database. No records of fossils were identified within the project site or one-mile search area. Additionally, a pedestrian survey of the ground disturbance portion of the project site was conducted on November 22, 2016 and no evidence of fossils was observed. Construction of the project would entail grading to a depth of 30 inches below the surface with some minor cuts up to approximately five feet deep for proposed retaining walls, as well as potential excavation of up to approximately three feet deep under the Carlton Hills Boulevard bridge for construction access. Given the absence of recorded fossils in the project area and limited extent of project grading, no paleontological resources are expected to be encountered during project construction activities. Therefore, the proposed project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. There is no impact.

e. Would the project disturb any human remains, including those interred outside of formal cemeteries?

Less Than Significant Impact. Disturbance to human remains, including those interred outside of formal cemeteries is not anticipated given the generally disturbed nature of the APE and extent of historic and modern development within the project area. If human remains are discovered, California Health and Safety Code Section 7050.5 states that further disturbance and activities shall cease in any area or nearby area suspected to overlie remains and the County Coroner contacted. Pursuant to Public Resources Code (PRC) Section 5097.98, if the Coroner recognizes the remains to be Native American, the Coroner shall notify the Native American Heritage Commission who would then notify the Most Likely Descendent. If Native American remains are discovered, the remains shall be kept *in situ*, or in a secure location in close proximity to where they were found, and the analysis of the remains shall only occur on-site in the presence of a Native American monitor. Further provisions of PRC Section 5097.98 are to be followed as applicable. Based on compliance with existing codes, the proposed project would not be expected to disturb any human remains. This impact is less than significant.

7.6 <u>Geology and Soils</u>

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the proposed project:				
a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
 Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42. 			•	
ii. Strong seismic ground shaking?				
iii. Seismic-related ground failure, including liquefaction?				
iv. Landslides?				
b. Result in substantial soil erosion or the loss of topsoil?				
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?			•	
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?				
e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				

The following discussion is based on the geotechnical investigation prepared for the project (Appendix G).

a. Would the project expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

 (i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)

Less Than Significant Impact. No active faults traverse the project area and the project site is not located in an Alquist-Priolo Earthquake Fault Zone. The closest major active fault to the

project site is the Rose Canyon Fault Zone (RCFZ), approximately 11.5 miles southwest of the project site. Several fault strands within the RCFZ have been classified as active faults and are included in Alquist-Priolo Special Study Zones.

The project would comply with current seismic design standards in accordance with the California Building Code, where applicable, to avoid adverse effects related to fault rupture. In addition, the project is not expected to result in the congregation of large numbers of people at any one time. Compliance with applicable seismic design criteria would ensure that people are not exposed to substantial adverse effects, including risk of loss, injury, or death, involving rupture of a known earthquake fault. This impact is less than significant.

(ii) Strong seismic ground shaking?

Less Than Significant Impact. The project site is located in a seismically active region, and is likely to be subjected to moderate to severe seismic ground shaking in response to a major earthquake occurring on the RCFZ or another major regional active fault. An earthquake along any of these known active fault zones could result in severe ground shaking, and consequently cause injury and/or property damage in the project vicinity. However, the proposed project would be designed to comply with current seismic design standards in accordance with the California Building Code, where applicable, to avoid adverse effects related to strong seismic ground shaking. In addition, the bike path is less susceptible to the hazards of strong seismic ground shaking than would other structures such as a building. Compliance with applicable seismic design criteria would ensure that people are not exposed to substantial adverse effects, including risk of loss, injury, or death, involving strong seismic ground shaking. This impact is less than significant.

(iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Seismic-induced soil liquefaction occurs when loose, saturated generally fine sands and silts are subjected to strong ground shaking. The soils lose shear strength and become liquid potentially resulting in large total and differential ground surface settlements, as well as lateral spreading. Based on the City of San Diego's Seismic Safety Study (City of San Diego 2008b), the project site is located within an area identified as having a high potential for liquefaction due to one or more of the following: presence of shallow groundwater, proximity to a major drainage, and/or presence of hydraulic fills. According to the geotechnical investigation prepared for the proposed project (Appendix G), liquefaction could potentially occur in the project area during a seismic event involving strong ground shaking along an active fault zone, particularly since the site is located adjacent to a major river corridor with relatively shallow groundwater (approximately 4.5 feet below the surface) and fill occurs along and below the berm. However, as discussed in Section 7.6(a)(i), no active faults traverse the site and the site is not located within an Alquist-Priolo Fault Zone. The closest major active fault is located approximately 11.5 miles away. Moreover, much of project would be constructed along a berm that would be widened and reinforced to further stabilize potential seismic hazards related to ground failure. As discussed in Section 7.6(a)(ii), the project would be designed in accordance with applicable seismic design standards and parameters in the California Building Code to avoid adverse effects related to seismic-related ground failure such as liquefaction. Compliance with applicable seismic design criteria would ensure that people are not exposed to substantial

adverse effects, including risk of loss, injury, or death, involving seismic-related ground failure, including liquefaction. This impact is less than significant.

(iv) Landslides?

No Impact. The San Diego Seismic Safety Study Geologic Hazards and Faults map (City of San Diego 2008b) indicates the project site is not located in an area that is susceptible to landslide hazards. In addition, the project site occurs in an area that is mostly characterized by flat topography; no large slopes occur in the project area. Thus, the proposed project would not expose people to substantial adverse effects, including risk of loss, injury, or death, involving landslides. There is no impact.

b. Would the project result in substantial soil erosion or the loss of topsoil?

Less Than Significant Impact. Portions of the proposed bike path would be constructed on, or adjacent to, an existing berm within the golf course. Some areas along the existing berm have been subject to erosion due to flows from the adjacent San Diego River to the immediate south. The project would rebuild and widen the berm to accommodate the proposed Class I bike path. 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 be vegetated to provide additional erosion control. The project has been designed with cross slopes directed toward the golf course such that runoff would be conveyed to the north side of the berm and collected within existing localized collection areas that would infiltrate into landscaped areas or continue to direct flows into the river through culverts and storm drain system currently in place. Thus, erosion potential would be low and minimized through project design.

During construction, substantial soil erosion would be avoided through conformance with a NPDES Construction General Permit. This permit would include preparation of a Storm Water Pollution Prevention Plan (SWPPP), which would incorporate BMPs to prevent soil erosion and the loss of topsoil. Implementation of BMPs identified in the SWPPP and erosion controls incorporated into the project design would ensure that the project would not result in substantial soil erosion or the loss of topsoil. This impact is less than significant.

c. Would the project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less Than Significant Impact. As discussed in Sections 7.6(a)(iii) and 7.6(a)(iv), the project site is not located within an area prone to landslides, but is located within an area that could be potentially susceptible to liquefaction during a seismic event involving strong ground shaking along an active fault zone. However, the proposed project would be designed in accordance with applicable seismic design criteria and also would incorporate engineering procedures identified in the geotechnical investigation (Appendix G) to stabilize underlying soils, such as removal and recompaction of fill soils, as well as stabilizing portions of the existing berm. Much of the proposed project would be constructed on top of the existing berm along the southern edge of the golf course, which is currently susceptible to erosion and scour failure (Appendix G). Some areas along the existing berm show indications of such instability. As discussed above in

Section 7.6(b), the berm would be engineered to support the bike path by widening it on the north side and reinforcing certain areas on the south side with slope protection for stability. Manufactured slopes along the rebuilt berm (and elsewhere within the project site) would be constructed no steeper than a 2:1 gradient, and fill slope faces would be compacted and vegetated to stabilize them from potential slope failure. Incorporation of these design considerations would ensure that the project would not be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. This impact is less than significant.

d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?

No Impact. Expansive soils are generally high in clays or silts that shrink or swell with variation in moisture content. Underlying soils in the project area have a low expansion potential. In addition, the project would incorporate standard engineering techniques in accordance with the California Building Code to avoid adverse effects of expansive soils. Therefore, the proposed project would not be located on expansive creating substantial risks to life or property. There is no impact.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?

No Impact. No wastewater disposal would be required by the project. Therefore, the proposed project would not have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems. There is no impact.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the proposed project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			•	
b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				

7.7 <u>Greenhouse Gas Emissions</u>

a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact. The project entails a bike path, which does not generate substantial amounts of greenhouse gas (GHG) emissions. 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. Such emissions would be temporary and would not be substantial such that they would contribute to a significant impact on the environment. The project could also result in operational GHG emissions associated with production of energy consumed by the lighting that may be installed along the bike path and the operation of maintenance vehicles. These emissions, however, would be negligible as the lighting for this project would be minimal and maintenance activities would be infrequent.

As well, the project would encourage the use of bicycles and walking as alternatives to driving, which do not generate GHG emissions. As described in *San Diego Forward: The Regional Plan* (SANDAG 2015b), bicycle improvements including the proposed project are part of an adopted regional strategy to achieve reductions in GHG emissions from passenger vehicles. Therefore, implementation of the proposed project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. This impact is less than significant.

b. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

No Impact. As discussed above in Section 7.7(a), the proposed project would not constitute a significant source of GHG emissions and would aid in the reduction of regional GHG emissions through encouraging walking and biking as alternatives to driving. The project would be consistent with and is included within *San Diego Forward: The Regional Plan* (including the Sustainable Communities Strategy), which identifies how local land use plans and regional transportation investments will meet and exceed the San Diego region's passenger vehicle GHG emissions targets for 2020 and 2035 that have been established by the State Air Resources Board pursuant to Senate Bill 375. In addition, the project would be consistent with the goals of *Riding to 2050, San Diego Regional Bicycle Plan* (SANDAG 2010) to increase bicycle commuters in order to help achieve transportation goals such as providing an alternative to driving and reducing vehicle miles traveled and GHG emissions. Implementation of the project would therefore not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of GHGs. There is no impact.

7.8	Hazards	and	Hazardous	Materials

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the proposed project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?				
b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?				
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				
d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?			•	
e. For a project located within an airport land use plan or, where such a plan has not been adopted within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				
f. For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?				
g. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				
h. Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?			•	

The following discussion is based on a Phase I Environmental Site Assessment (ESA) completed for the project (Appendix H).

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. During the project construction period, hazardous substances used to maintain and operate construction equipment, such as fuel and lubricants, would be present. The transport, use, and disposal of such hazardous materials would be conducted in accordance with applicable state and federal laws such as the Resource Conservation and

Recovery Act (32 U.S.C. §6901 et seq.) and the California Health and Safety Code (CCR Title 22, Division 4.5). Additionally, implementation of a SWPPP and standard construction BMPs, such as storing hazardous materials (e.g., oils, fuels, solvents, and paint) in sealed watertight containers in a contained area and away from storm drains or water courses and disposing waste by a licensed hazardous waste transporter at an authorized and licensed disposal facility, would prevent the use of these materials from causing a significant hazard to the public or environment. Examples of typical construction BMPs addressing hazardous materials and waste include (1) storage of hazardous materials (e.g., oils, fuels, solvents, and paint) in clearly labeled, sealed watertight containers in a contained area and away from storm drains or water courses, (2) prepare a hazardous spill and cleanup program and educate employees and subcontractors how to implement cleanup procedures, and (3) disposal of waste by a licensed hazardous waste transporter at an authorized and licensed disposal facility. After construction, maintenance vehicles and equipment would incorporate the use of general products that may contain hazardous materials. Maintenance activities would be minimal and would comply with applicable regulatory standards. Thus, the proposed project would not result in a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. This impact is less than significant.

b. Would the project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. Potential release of hazardous materials and/or wastes during project construction is discussed above in Section 7.8(a). As noted therein, potential impacts associated with construction-related hazardous materials would be less than significant based on compliance with regulatory requirements and standard construction BMPs. Additionally, the potential to encounter contaminated soils and/or groundwater during construction activities is low, as discussed in Section 7.8(d). Long-term operation of the proposed project would not involve the use or transport of hazardous materials. Infrequent operation of maintenance vehicles may involve the use of cleaning agents or other chemicals typically used for maintenance, but the types of such agents transported in maintenance vehicles would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. This impact is less than significant.

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. The nearest school to the project site, Carlton Hills School, is located approximately 0.2 mile to the northeast and the next closest school, Carlton Oaks School, is located approximately 0.3 mile to the north. The project consists of a bike path, which does not involve the routine use of hazardous materials that could adversely affect humans at nearby schools. Therefore, the proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one quarter mile of an existing or proposed school. There is no impact.

d. Would the project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less Than Significant Impact. A search of available regulatory agency databases was conducted to identify recorded sites and facilities within a one-mile radius of the project site that could pose a potential health and safety risk to the project site (Appendix H), including the Department of Toxic Substance Control's EnviroStor list that is compiled pursuant to Government Code Section 65962.5. A total of 18 sites were identified in the search area that could pose a risk; however, none are located along or adjacent to the project site, and none were determined to represent an environmental concern due to distance, closed-case status, lack of reported releases, and/or ongoing regulatory oversight. Therefore, listed hazardous materials sites in the project vicinity would not pose a significant health hazard for people who would utilize the proposed bike path. The proposed project is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would not create a significant hazard to the public or the environment. This impact is less than significant.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?

No Impact. The Gillespie Field Airport Land Use Compatibility Plan (ALUCP) identifies the project site as being located within the Airport Influence Area (AIA) of Gillespie Field, which is located approximately 1.5 miles to the southeast (San Diego County Regional Airport Authority 2010). The Gillespie Field AIA is divided into Review Area 1 and Review Area 2. Review Area 1 consists of locations where noise and safety concerns could necessitate limitations on the types of land use actions. Review Area 2 consists of locations beyond Review Area 1, but within the airspace and/or overflight notification areas. Limits on the height of structures, particularly in areas of high terrain, are the only restriction on land uses within Review Area 2. The project site is located within Review Area 2 and not within any Safety Zones identified in the ALUCP. No tall structures or other vertical elements are proposed that would require notification to the Federal Aviation Administration or pose a safety hazard to airport operations or people using the bike path. Therefore, the proposed project would not result in a safety hazard for people residing or working in the project area. There is no impact.

f. For a project located within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

No Impact. The proposed project is not located within the vicinity of a private airstrip. Thus, the project would not result in a safety hazard for people residing or working in the project area. There is no impact.

g. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. The proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Primary access to all surrounding public roadways would be maintained during construction and operation of the proposed project. There is no impact.

h. Would the project expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

Less Than Significant Impact. The project site is located in a developed area along a natural river corridor that connects to large open space associated with Mission Trails Regional Park. The site is located within an area designated as a Very High Fire Hazard Severity Zone by the City of San Diego Fire-Rescue Department (City of San Diego 2009). However, the project does not propose any habitable structures or other combustible components that would increase the potential for wildfires in the project area. The project would not increase or exacerbate the existing risk of loss, injury, or death involving wildland fires in the project area. This impact is less than significant.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the proposed project:				
a. Violate any water quality standards or waste discharge requirements?				
 b. Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)? 			•	
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off site?				
d. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site?				

7.9 <u>Hydrology and Water Quality</u>

	Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e.	Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?				
f.	Otherwise substantially degrade water quality?				
g.	Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?			•	
h.	Place within a 100-year flood hazard area, structures which would impede or redirect flood flows?			•	
i.	Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?			•	
j.	Inundation by seiche, tsunami, or mudflow?				

The following discussion is based on a Water Quality Analysis and Hydrology Study completed for the project (Appendices I and J, respectively).

a. Would the project violate any water quality standards or waste discharge requirements?

Less Than Significant Impact. The project is subject to compliance with applicable elements of the CWA and NPDES requirements. Section 401 of the CWA mandates that a water quality certification be obtained from the SWRCB or the appropriate RWQCB when a project requires a CWA Section 404 permit. In addition, CWA Section 402 establishes the NPDES for regulating the discharge of pollutants into waters of the U.S. Specific NPDES requirements associated with the proposed project include conformance with Waste Discharge Requirements for Municipal Separate Storm Sewer Systems (MS4) Permit (Municipal Permit, NPDES No. CAS 0109266, Order No. R9-2013-0001, as amended by Order Nos. R9-2015-0001 and R9-2015-0100). Because the project site is located in both the cities of San Diego and Santee, the project is subject to storm water regulations under both cities' MS4 Permits. These include the City of San Diego's 2016 Storm Water Standards (City of San Diego 2016b) and the City of Santee's Storm Water Ordinance (Santee Municipal Code Chapter 13.42) and BMP Design Manual (City of Santee 2016).

The proposed project qualifies as exempt from City of San Diego and City of Santee Priority Development Project (PDP) storm water requirements because it consists of a new bike and pedestrian trail that would direct storm water runoff to adjacent vegetated areas or other non-erodible permeable areas. As a result, the project is not required to include pollutant treatment or hydromodification controls (Appendix I). Per City of San Diego and City of Santee requirements, PDP exempt projects are still required to comply with site design and source control BMP requirements. The types of BMPs that could be implemented as part of the project are identified below.

Construction of the project potentially could result in short-term erosion and sedimentation, as well as temporarily introduce other pollutants with the potential to affect water quality (e.g., fuels and oils). Water quality impacts would be avoided during construction through conformance with a NPDES Construction General Permit, as well as BMPs identified in the SWPPP and the Water Quality Analysis. Long-term contaminants related to oil and gas are not associated with the bicycle facilities, with the exception of the infrequent operation of maintenance vehicles along the bike path. However, the infrequent presence of maintenance vehicles along the proposed bike path would introduce a negligible amount of pollutants to the project area. In addition, the proposed project would direct storm water runoff to adjacent vegetated areas or other non-erodible permeable areas. The proposed project also would incorporate BMPs such as protecting trash storage areas from rainfall, run-on, runoff, and wind dispersal to avoid water quality impacts related to trash or debris that could be generated by users of the proposed project. The Water Quality Analysis (Appendix I) identifies the following types of source control and site design BMPs that could be incorporated into the project which would reduce or avoid water quality impacts resulting from construction and operation of the proposed project:

- Prevention of illicit discharges into the MS4
- Protect outdoor materials storage areas, materials stored in outdoor work areas, and trash storage areas from rainfall, run-on, runoff, and wind dispersal
- Landscape/outdoor pesticide use
- Outdoor storage of equipment or materials
- Vehicle and equipment cleaning
- Maintain natural drainage pathways and hydrologic features
- Conserve natural areas, soils, and vegetation
- Minimize impervious area
- Minimize soil compaction
- Disperse impervious area
- Collect runoff
- Landscape with native or drought tolerant species

In addition to CWA NPDES requirements, states are required to identify and document polluted surface water bodies, with the resulting documentation referred to as the CWA Section 303(d) List of Water Quality Limited Segments. This list of water bodies identifies the associated pollutants and total maximum daily loads (TMDLs), along with projected TMDL implementation schedules/status. A TMDL establishes the maximum amount of an impairing substance or stressor that a water body can assimilate and still meet water quality standards, and allocates that load among pollution contributors. The project site is located within the San Diego River Basin, in the San Diego River (Upper) Segment. The San Diego River (Upper) Segment is not listed in the 2012 version of the 303(d) list (the most current version) of surface water bodies that are polluted. Implementation of the above BMP types identified in the Water Quality

Analysis would ensure that the proposed project would not create adverse water quality impacts to the San Diego River (Upper) Basin or downstream receiving waters.

Additionally, the project would be required to obtain a Section 401 CWA Water Quality Certification (WQC) from the RWQCB. The WQC program was initiated in response to the requirements of Section 401 of the CWA, which mandates that a WQC must be obtained from the SWRCB or the appropriate RWQCB when a project requires a CWA 404 permit from the USACE. In addition to protecting wetlands by regulating in-stream fill, the WQC aims to protect water quality by regulating hydromodification in considering project-induced changes to channel form, flow regime, and sediment supply. Specific conditions are identified in the WQC, including references to the BMPs listed in the project SWPPP that must be implemented to minimize and/or avoid water quality impacts. Example types of BMPs are identified above.

Compliance with the requirements of the CWA (including Section 401, Section 303(d), and Section 402 [NPDES requirements], NPDES Construction General Permit, and the Water Quality Analysis would ensure that the proposed project would not violate any water quality standards or waste discharge requirements. This impact is less than significant.

b. Would the project substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

Less Than Significant Impact. The project does not propose the use of groundwater. While the proposed project would result in the addition of some impervious surfaces, most of the bike path would be constructed on a berm designed with cross slopes to direct flows into landscaped and other adjacent pervious areas where water could infiltrate the soil. Thus, the proposed project would not substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level. This impact is less than significant.

- c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on or off site?
- d. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site?

c-d. Less Than Significant Impact. Existing drainage in the golf course is collected in various localized low points along the golf course, adjacent to the north side of the existing berm, as well as in water features within the golf course. Near the east end of the project site, drainage is collected in an existing curb inlet along the west side of Carlton Hills Boulevard and discharged into an earthen drainage channel via a 48-inch-diameter pipe and into the San Diego River. Within Mast Park West, runoff is directed to two existing low-flow drainage crossings at

localized low points that allows for water to surface drain across the existing dirt path and into the adjacent San Diego River.

The proposed project would not substantially alter the overall existing drainage patterns. The bike path would be constructed on a berm designed with cross slopes to direct flows towards the golf course on the north side of the bike path. Runoff would be conveyed to existing localized collection areas that would infiltrate into adjacent vegetated areas or other non-erodible permeable areas. For the portion of the project east of the golf course, drainage would continue to be directed across the site as surface flow and into adjacent vegetated areas or other non-erodible permeable areas.

The increase in impervious area associated with the paved bike pathproposed project (including the reinforced and expanded berm, all grading [including the proposed 10,000 cubic yards of net fill], and retaining walls) 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 considered a negligible increase compared to the overall FEMA flowrate for the San Diego River rate of approximately 38,000 cfs and would not adversely affect the project area or downstream areas associated with substantial erosion, siltation, and/or flooding. Runoff from smaller storms would infiltrate into adjacent vegetated areas on the north side of the berm and would not have a direct connection to the adjacent San Diego River flow area. Conveying flows in this direction would protect the berm from potential erosion due to project-generated flows. The localized basins are within the San Diego River Floodplain fringe, and flows within the floodplain would be higher than the berm in large storm events such that the basin would become part of the San Diego River flow. As the proposed project would be in an inundated area under these conditions, there would be no peak flow increase generated by the project. In addition, the project would comply with applicable storm water regulations and would be required to prepare a SWPPP that would further reduce the potential for substantial erosion and siltation during construction and project operation, as discussed in Section 7.9(a). Therefore, the proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner in a manner which would result in substantial erosion, siltation, or flooding on or off site. This impact is less than significant.

e. Would the project create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?

Less Than Significant Impact. As discussed under Sections 7.9(c) and 7.9(d), the addition of impervious areasproposed project (including the reinforced and expanded berm, all grading [including the proposed 10,000 cubic yards of net fill], and retaining walls) would increase the on-site 100-year storm flows by approximately 4.74 cfs within the golf course and approximately 0.38 cfs just east of the golf course, but existing and proposed drainage facilities would accommodate the net increase in runoff generated by the project. Proposed drainage facilities would include improvements to approximately three low-flow drainage crossings and construct a drainage ford in the eastern portion of the project site within Mast Park West. The low-flow crossings at localized low points would be reconstructed with a concrete surface with
surrounding rip-rap to avoid undermining the bike path and for erosion prevention. The drainage ford would cross an existing earthen channel along Carlton Hills Boulevard and would include a natural bottom to convey flows during smaller storm events to the earthen channel. It would also allow for larger storm events to surface flow across the bike path. At the western end of the project alignment, a brow ditch would be constructed along the ramp that would connect to West Hills Parkway (under all of the West Hills Parkway ramp options). The brow ditch would convey surface flows from the bike path at top of the ramp, into a culvert under the proposed stairwell, and into the riparian areas on the south side of the bike path. Along the berm, which would be widened and reinforced in certain areas to support the bike path and protect it from potential erosion, drainage would surface flow across the bike path towards the golf course. This engineered drainage pattern for the project within the golf course would further prevent erosion of the berm since runoff would be directed away from the berm and away from the San Diego River. As discussed in Section 7.9(a), implementation of the BMP types identified in the Water Quality Analysis (Appendix I) would ensure that the proposed project would not create adverse water quality impacts related to the discharge of pollutants into the San Diego River (Upper) Basin and downstream receiving waters. Thus, the proposed project would not create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff. This impact is less than significant.

f. Would the project otherwise substantially degrade water quality?

Less Than Significant Impact. As discussed in Section 7.9(a), the project would not substantially degrade water quality through compliance with the NPDES Construction General Permit and BMPs identified in the Water Quality Analysis (Appendix I). The project does not include any features or result in any impacts that would otherwise substantially degrade water quality. This impact is less than significant.

- g. Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?
- h. Would the project place within a 100-year flood hazard area, structures which would impede or redirect flood flows?
- **g-h. Less Than Significant Impact**. The project alignment is located within the AE Zone of 100-year floodway of the San Diego River. The AE Zone is subject to inundation by the one-percent annual chance flood and has base flood elevations determined. However, <u>T</u>the proposed project does not involve housing. or any other<u>Proposed</u> structures include retaining walls at select locations along the north side of bike path within the golf course, a bridge or similar structure to cross Sycamore Creek near the west end of the project alignment, and the reinforced and expanded berm within the golf course. These structures would not impede or redirect existing flood flows. As discussed in Section 7.9(c-d), the project would increase the 100-year on-site storm flow within the localized basins within the golf course. This change is considered a negligible increase compared to the overall FEMA flowrate for the San Diego River of approximately 38,000 cfs and would not adversely affect the project area

or downstream areas associated with flooding. In addition a flood hydraulic analysis study was prepared as part of the Hydrology Study (Appendix J), which evaluated 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 (Chapter 15.52.070) and accounts for the existing berm and proposed project elements, including the reinforced and expanded berm, all grading (including the proposed 10,000 cubic yards of net fill), and retaining walls. The hydraulic analysis concluded that the project would result in a slight increase (0.05-foot [0.60-inch] maximum) in the 100-year water surface elevations, which would not substantially affect flood flows. Therefore, the proposed project would not place housing or other structures within a 100-year flood hazard area that would impede or redirect flood flows. This impact is less than significant.

i. Would the project expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam?

Less Than Significant Impact. The bike path would be located within the 100-year floodplain zone and could be subject to flood conditions during a large storm event. Project implementation would result in a small increase in flood elevations varying from +0.01 feet (0.12 inch) to +0.05 feet (0.60 inch). During and immediately following large storm events, portions of the bike path could be temporarily flooded, which may result in portions being out of service. However, no permanent habitable structures would be constructed in conjunction with the project. Additionally, the project would not expose people or structures to flooding as a result of the failure of a levee or dam. There are no dams immediately upstream of the proposed project, although the site is located downstream of three major dams, including Chet Harritt Dam (approximately 6.5 miles to the northeast at Lake Jennings), El Capitan Dam (approximately 12 miles to the northeast at El Capitan Reservoir), and San Vicente Dam (approximately 6.5 miles to the northeast at San Vicente Reservoir) and is within the dam inundation areas associated with these three dams (City of Santee 2003). However, the project would not expose people to associated flood hazards due to the fact that no permanent habitable structures would be constructed in conjunction with the project in combination with the relative distance between the project site and the dams and required regulatory dam safety protocols overseen by California Department of Water Resources Division of Safety of Dams. and the The project is also not located near any designated levees. The existing and proposed berm upon which much of the bike path would be constructed atop, was initially constructed to protect the golf course from flooding during five- to ten-year flood events. The proposed berm would continue to provide the same degree of flood protection for the golf course, and does not function as a flood control feature but it would be reinforced in some areas where erosion is evident with slope protection to strengthen the berm. Accordingly, the proposed project would not expose people or structures to significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam. This impact is less than significant.

j. Would the project expose people or structures to inundation by seiche, tsunami, or mudflow?

No Impact. The project site is not located within a risk zone from a tsunami due to its inland location (over 14 miles from the coast). The project is not located in an enclosed or partially enclosed body of water, such as a bay or lake, where a seiche could occur. Lastly, the project

would not subject people or structures to mudflow based upon the topography of the project area and the elevated position of the bike path atop a berm. Therefore, the proposed project would not expose people or structures to inundation by seiche, tsunami, or mudflow. There is no impact.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the proposed project:				
a. Physically divide an established community?				
 b. Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? 			•	
c. Conflict with any applicable habitat conservation plan or natural community conservation plan?				

7.10 Land Use and Planning

a. Would the project physically divide an established community?

No Impact. The proposed project would include the construction of a bicycle facility that would connect two public access points (Mast Park and West Hills Parkway) and is a segment of the planned SDRT that, once completed, would provide a multi-use trail along the San Diego River from the ocean to the City of Santee. The proposed project does not include the construction of public roads, structures, or other improvements that would physically divide or separate neighborhoods. Therefore, the project would not physically divide an established community. There is no impact.

b. Would the project conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. The project site is located partially within the East Elliott community plan area of the City of San Diego and partially within the City of Santee. The proposed project would not conflict with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect, including the *City of San Diego General Plan, East Elliott Community Plan, City of Santee General Plan 2020*, and the *San Diego River Park Master Plan*. The proposed project would be consistent with applicable goals and guidelines contained in these land use plans.

The proposed bike path would be consistent with policies pertaining to bicycles in the Mobility Element (Section F, Bicycling) of the *City of San Diego General Plan* (City of San Diego 2008a), such as ME-F.2 ("Identify and implement a network of bikeways that are feasible, fundable, and serve bicyclists' needs, especially for travel to employment centers, village

centers, schools, commercial districts, transit stations, and institutions") and ME-F.3 ("Maintain and improve the quality, operation, and integrity of the bikeway network and roadways regularly used by bicyclists").

The *East Elliott Community Plan* (City of San Diego 2015) includes a San Diego River Park section along with recommendations to support the implementation of the San Diego River Park, including construction of the San Diego River Pathway to connect the Mission Trails Regional Park trails system with the City of Santee with a connection to West Hills Parkway. Consistent with these recommendations, the project would construct a segment of the SDRT, which would implement the San Diego River Pathway identified in the community plan, from the City of Santee, through the golf course, and to West Hills Parkway.

The Trails Element (Figure 5-1) of the *City of Santee General Plan 2020* (City of Santee 2003) identifies existing and planned trails within the City and includes a planned trail through the Carlton Oaks Golf Course between Mast Park and West Hills Parkway generally consistent with the proposed alignment of the bike path. The Trails Element also identifies implementation of the San Diego River Route (i.e., SDRT) as a high priority Class I bike path that is planned to be constructed along the full length of the San Diego River within the City of Santee. The proposed project would implement a segment of this planned trail.

The proposed bike path would be constructed in an area within the boundaries of the portion of the San Diego River Park addressed in the San Diego River Park Master Plan (City of San Diego 2013a). The master plan recommends the creation of a continuous multi-use San Diego River Pathway from the Pacific Ocean to the City of Santee. The project is consistent with the San Diego River Park Master Plan in that it would implement a portion of the overall SDRT envisioned in the master plan. Proposed lighting also would be consistent with the lighting guidelines contained in the master plan (refer to the discussion of project lighting in Section 2.0).

In summary, the proposed project would support the goals, objectives, and policies to increase the use of bicycles in adopted land use plans, and also would implement a segment of the SDRT that is identified in adopted land use plans. Thus, the proposed project would not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect. This impact is less than significant.

c. Would the project conflict with any applicable habitat conservation plan or natural community conservation plan?

Less Than Significant Impact. The proposed bike path alignment is located partially within and adjacent to the planning boundary of the City of San Diego's MSCP Subarea Plan. As discussed in detail in Section 7.4(f), although not subject to the MSCP, the proposed project would not conflict with adopted habitat conservation plans, including the MSCP. This impact is less than significant.

7.11 <u>Mineral Resources</u>

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the proposed project:				
a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				
b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				

- a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?
- **b.** Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

a-b. Less Than Significant Impact. According to the Conservation Element (Figure CE-6) of the *City of San Diego General Plan* (City of San Diego 2008a), the project site is located within areas identified as Mineral Resource Classification Zone Category 2 (MRZ-2), which are areas designated for the managed production of mineral resources. These mineral land classifications are based on mapping and information from the California Department of Conservation. Sand and gravel extraction has occurred in Santee along the San Diego River, but no such operations have occurred in the project area; previous and existing mining operations occur upstream to the east. The project site consists mostly of a developed golf course and park land, and is not used for mineral resource recovery. It is not delineated as a mineral resource recovery site on any land use plans. Therefore, the proposed project would not result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state, or a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan. This impact is less than significant.

7.12 <u>Noise</u>

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the proposed project result in:				
a. Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				
b. Exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels?				
c. A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			•	
d. A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?				
e. For a project located within an airport land use plan or where such a plan has not been adopted within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				
f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?				

a. Would the project result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact. Noise-sensitive land uses are associated with indoor and/or outdoor activities that may be subject to stress and/or substantial interference from noise, and often include residential dwellings, mobile homes, hotels, motels, hospitals, nursing homes, educational facilities, libraries, parks, and nature/wildlife preserves. Industrial, commercial, and agricultural land uses are generally not considered sensitive to noise. Surrounding developed land uses are comprised of residential development. The nearest residential use area is located between approximately 50 and 200 feet (depending on the West Hills Parkway connection options and potential Padre Dam Easement Construction Access) north of the nearest portion of the project site along Carlton Oaks Drive. An evaluation of potential noise impacts is provided below.

Construction Noise

The project is located within portions of the cities of Santee and San Diego. The City of Santee restricts construction on Sundays and holidays and prohibits construction noise levels to in excess of 75 decibels (dBA) for more than 8 hours during a 24-hour period at the property line of a residential use, as specified in Section 8.12.290 of the Santee Municipal Code (City of

Santee 2014). City of San Diego construction noise requirements are similar, in that construction activities are prohibited between the hours of 7:00 p.m. and 7:00 a.m. and on Sundays and legal holidays, except in the case of emergency and construction noise within that 12-hour period is limited to a maximum average of 75 dBA at residential uses per Section 59.0404 of the City of San Diego Municipal Code (City of San Diego 2010). Project construction activities would comply with these restrictions.

The loudest equipment that would be used during construction of the portions of the proposed project located near residential receptors would be a small excavator or backhoe or equipment with similar noise levels associated with grading for the proposed ramp that would connect to the existing sidewalk along West Hills Parkway. The Federal Highway Administration (FHWA) Roadway Construction Noise Model lists the noise level of a backhoe as 78 dBA at 50 feet from the noise source. The nearest residential receiver from where the backhoe would operate is located approximately 200 feet to the north for the Curvilinear Ramp or Switchback Ramp Options, and approximately 50 feet to the north for the Linear Ramp Option. The noise level of a small excavator would be reduced to approximately 66 dBA at a distance of 200 feet assuming an attenuation factor of 6 dBA per doubling of distance with direct line of sight between the noise source and receiver (based on the FHWA Roadway Construction Noise Model). While use of a small excavator/backhoe (or equipment with similar noise levels) in the northwestern-most corner of the project site under the Linear Ramp Option could periodically generate noise levels of approximately 78 dBA at the closest residential property line, operation of such equipment would not occur continuously in this location such that the average noise level would exceed 75 dBA over an 8- or 12-hour period per City of Santee or City of San Diego construction noise regulations. Thus, construction noise associated with the loudest equipment is anticipated to be less than a maximum average of 75 dBA L_{EO} (over an 8- or 12-hour period) at these noise-sensitive uses under any of the West Hills Parkway connection options, which would not expose people to noise levels in excess of applicable noise ordinance standards.

Construction access routes could be provided from one or more of the following locations for any of the West Hills Parkway connection options: West Hills Parkway, the Padre Dam Easement Construction Access, and/or the parking lot at Mast Park. These access routes would be used by construction workers and for delivery of construction materials. No ground-disturbing activities or specific construction operations (i.e., concrete mixing/pumping/cutting, loading, etc.) would occur along any of the three potential access routes (with the exception of excavation up to three feet deep underneath Carlton Hills Boulevard); vehicles would travel along the access routes at slow speeds, with a maximum of 25 miles per hour. Vehicles would utilize the access routes periodically throughout the day, and associated vehicular noise would be transitory in nature consisting of engine noise. The construction access point from West Hills Parkway (for any of the West Hills Parkway connection options) and Mast Park would occur at a distance of approximately 200 feet from the closest residential receptor. The Padre Dam Easement Construction Access is located approximately 50 feet from residences of the Vista del Verde development. Based on these distances to existing homes and the transitory nature of construction vehicles utilizing the access routes, vehicles traveling along any of the three potential access routes would not expose people to noise levels in excess of applicable noise ordinance standards.

Project Operations

Chapter 8.12, Noise Abatement and Control, of the City of Santee's Municipal Code and the City of San Diego's Noise Ordinance (Chapter 5, Article 9.5 of the San Diego Municipal Code, Noise Abatement and Control) regulates noise generated by on-site stationary sources, such as heating, ventilation, and air conditioning units. The project, however, entails a Class I bike path, which does not include stationary noise sources. As such, the City of Santee's Noise Abatement Control and the City of San Diego's Noise Ordinance do not apply to the project.

The City of Santee's General Plan Noise Element (City of Santee 2003) establishes a noise standard (24-hour average) of 65 dBA for residential uses. The City of San Diego's General Plan Noise Element (City 2008a) establishes noise compatibility guidelines for uses affected by traffic noise. The conditionally compatible and compatible noise levels (24-hour average) for the closest off-site noise-sensitive land uses, multi-family residential and single-family residential, are 70 and 60 dBA, respectively.

The proposed facility would be used by people walking and biking. In the existing condition, the project area includes people walking and biking and people playing golf at the adjacent golf course. Because the project entails a Class I bike path to accommodate non-motorized transportation modes, it would not generate substantial traffic trips or corresponding traffic noise. Noise levels associated with infrequent maintenance of the bike path would be negligible. As a result, operational noise from use and maintenance of the proposed project would not expose people to noise levels in excess of applicable noise standards.

Conclusion

The proposed project would not result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies because construction noise levels would not exceed construction noise limits contained in applicable portions of the City of San Diego or City of Santee Municipal Code, and operation and maintenance noise levels would be negligible. This impact is less than significant.

b. Would the project result in exposure of persons to or generation of excessive groundborne vibration or ground-borne noise levels?

Less Than Significant Impact. The proposed project does not include any components that would generate excessive ground-borne vibration or ground-borne noise levels. While equipment used during project construction may result in the generation of nominal levels of ground-borne vibration, these would be temporary and transitory in nature. No pile driving, blasting, or other construction activities that would result in excessive ground-borne vibration or ground-borne noise would be required. A potential on-site source of vibration during project construction would be a vibratory roller (primarily used to achieve soil compaction), which could potentially be used within approximately 50 feet of an existing residence near the west end of the project site. A vibratory roller creates approximately 0.210 inches per second peak particle velocity (PPV) at a distance of 25 feet (Caltrans 2013). The City of Santee or the City of San Diego does not state specific standards in their respective General Plans or Municipal Codes for vibration.

Caltrans standards for human annoyance for construction vibration impacts use a criterion of 0.4 inches per second PPV at 25 feet (Caltrans 2013). The approximately 0.210 inches per second PPV vibration level at 25 feet means that vibration levels would not exceed the Caltrans standard for human annoyance of 0.4 inches per second PPV at 50 feet (the nearest residence) and thus, construction equipment would not generate excessive ground-borne vibration.

As discussed in Section 7.12(a), the three potential construction access routes would occur as close as approximately 50 feet from existing residences, but these access routes would be used by construction workers and for delivery of construction materials. No ground-disturbing activities or specific construction operations that generate excessive ground-borne vibration would occur along any of the three potential access routes. Vehicles would travel along the access routes at slow speeds (maximum of 25 miles per hour) to reach the project site. Although vibration may be perceptible by nearby residents at times during project construction, vehicles accessing the project site would not cause vibration levels to exceed the Caltrans standard at the residences. Therefore, the project would not result in exposure of persons to or generation of excessive ground-borne vibration or ground-borne noise levels. This impact is less than significant.

c. Would the project result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact. Bicyclists and pedestrians using the proposed bike path would not create or contribute to a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. The existing project area consists of people walking and biking along the existing trail and berm, as well as people playing golf and operating golf carts at the adjacent golf course. The project site is also adjacent to State Route 52, which generates traffic related in the project area. As discussed in Section 7.12(a), the project entails a Class I bike path to accommodate non-motorized transportation modes, which do not generate substantial traffic noise. Recreational usage noise and infrequent maintenance activities would be masked by existing ambient noise associated with roadways and the adjacent freeway. Therefore, the project vicinity above levels existing without the project. This impact is less than significant.

d. Would the project result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Less Than Significant Impact. As discussed in Section 7.12(a), construction would temporarily elevate ambient noise levels in the project vicinity, but the construction noise would conform to the City of Santee and City of San Diego noise regulations for construction. Additionally, as discussed in Section 7.12(a), operational noise levels would not substantially elevate ambient noise levels in the project vicinity, either permanently or periodically. Therefore, the proposed project would not result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project. This impact is less than significant.

e. For a project located within an airport land use plan or where such a plan has not been adopted within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Less Than Significant Impact. As discussed in Section 7.7(e), the project site is located in the AIA of Gillespie Field, which is located approximately 1.5 miles to the southeast. The eastern portion of the bike path alignment is located within the 60 to 65 dBA CNEL noise contour identified on the Noise Compatibility Map (Exhibit III-1) contained in the Gillespie Field ALUCP (San Diego County Regional Airport Authority 2010). Bike path users within the east end of the bike path could potentially be exposed to aircraft noise levels up to 65 dBA CNEL, which would not be excessive. Thus, the proposed project, which is within an airport land use plan, would not expose people residing or working in the project area to excessive noise levels. This impact is less than significant.

f. For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The project is not located within the vicinity of a private airstrip. Therefore, persons using the proposed bike path would not be exposed to noise from a private airstrip. There is no impact.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the proposed project:				
a. Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				
b. Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				
c. Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				

7.13 **Population and Housing**

a. Would the project induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

No Impact. Implementation of the proposed project would not directly induce population growth because no housing or new businesses are proposed. Bike path users not living in the vicinity of the bike path would be expected to visit the bike path rather than permanently relocate. The proposed project is intended to serve existing and planned growth in this part of the San Diego region. Furthermore, the project would not result in the extension of roads or other infrastructure that would indirectly induce substantial population growth. Therefore, the proposed project

would not induce substantial population growth in an area, either directly or indirectly. There is no impact.

b. Would the project displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?

No Impact. The project would not result in the removal of any existing homes. Therefore, the proposed project would not displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere. There is no impact.

c. Would the project displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

No Impact. The project would not result in the removal of any existing homes or the displacement of any residents or businesses. Therefore, the proposed project would not displace substantial numbers of people, necessitating the construction of replacement housing elsewhere. There is no impact.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the proposed project:				
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
i. Fire protection?				
ii. Police protection?				
iii. Schools?				
iv. Parks?				
v. Other public facilities?				

7.14 <u>Public Services</u>

a. i–v. Would the proposed project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire protection, police protection, schools, parks, or other public facilities?

Fire and Police Protection

Less Than Significant Impact. The project site is located in a developed area currently served by existing public services, including fire and police protection. The project would not increase population in the project area or cause increased traffic congestion on streets in the project area, or otherwise interfere with the ability of police and fire services to maintain acceptable service ratios, meet target response times, or other performance objectives for fire or police protection. Additionally, a traffic control plan would be implemented during project construction that would include provisions to maintain vehicle access surrounding roadways for emergency vehicles. Therefore, the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for fire and police protection. This impact is less than significant.

Schools

No Impact. The proposed project would not increase or contribute to an increase in the existing student population in the project area. Therefore, no new school facilities would be required which could result in adverse physical changes in the environment. The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for schools. There is no impact.

Parks

Less than Significant Impact. The proposed project would not introduce a new population to the area. However, the proposed project would increase bicycle and pedestrian connectivity through the area, which may indirectly increase access to existing parks. This increase in park use resulting from indirectly increased access would not substantially affect the performance of existing parks such that new or altered facilities would be required. Therefore, the proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for parks. This impact is less than significant.

Other Public Facilities

No Impact. Development of the proposed project would not increase population or otherwise affect demand for other public facilities, such as libraries, within the project area. Therefore, no new facilities would be required which could result in adverse physical changes in the environment. The project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for other public facilities. There is no impact.

7.15 <u>Recreation</u>

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the proposed project:				
a. Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			•	
b. Include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				•

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?

Less Than Significant Impact. Existing neighborhood and/or regional parks located in the project vicinity include Mast Park, West Hills Park, and Mission Trails Regional Park. Mast Park is a City of Santee park located at the east end of the project site, and the project alignment would connect to the parking area within Mast Park. West Hills Park is also a City of Santee park, located approximately 0.4 mile to the north. Mission Trails Regional Park is located in close proximity to the western end of the project site, approximately 300 feet to the west. The proposed project is expected to, among other things, encourage recreational bicyclists to use the bike path to obtain access to recreational facilities within the project area, including these parks, other segments of the SDRT, destinations along the San Diego River, and other areas served by the regional bicycle system. However, recreational bicyclists can currently access these recreational facilities which can be accessed from the proposed project would not be such that substantial physical deterioration of existing neighborhood and regional parks or recreational facilities would occur or be accelerated. This impact is less than significant.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

No Impact. The proposed project does not include the construction or expansion of recreational facilities. The project itself does not require the construction or expansion of recreation facilities. Therefore, the project does not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. There is no impact.

7.16 <u>Transportation/Traffic</u>

	Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
W	ould the proposed project:				
a.	Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?				•
b.	Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?				
c.	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?				
d.	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				
e.	Result in inadequate emergency access?				
f.	Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?				•

a. Would the project conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?

No Impact. The proposed project would be consistent with *San Diego Forward: The Regional Plan* (SANDAG 2015b), which is the applicable plan establishing multi-modal performance measures for the regional transportation system. The proposed project would also be consistent with the *Riding to 2050, San Diego Regional Bicycle Plan* (SANDAG 2010) and the *San Diego River Park Master Plan* (City of San Diego 2013a). The proposed bike path would improve the performance of the circulation system and contribute to reduced vehicular miles traveled by providing an alternative to single occupancy vehicle commuting and increasing the amount of Class I bikeways within the region and constructing a segment of the SDRT that will eventually provide a continuous multi-use trail that extends along the San Diego River (from the Pacific Ocean to its headwaters near Julian) to provide connections to employment centers, recreation facilities, and activity centers and destinations.

The proposed project would include modifications to a segment of West Hills Parkway between where the ramp at the west end of the project alignment would connect to the existing sidewalk and the West Hills Parkway/Carlton Oaks Drive intersection. This roadway segment and intersection are located within the City of San Diego and as such, the applicable plan that identifies measures of effectiveness for the performance of the circulation system is the City of San Diego General Plan Mobility Element (City of San Diego 2008a) along with the City of San Diego Traffic Impact Study Manual (City of San Diego 1998). The Mobility Element contains policies intended to provide a more balanced multi-modal transportation system and does not include quantitative measures of effectiveness. The Traffic Impact Study Manual, however, identifies specific level of service (LOS) metrics for the performance of roadways and intersections, and designates LOS A through D as acceptable LOS for roadways and intersections.

The extent of modifications to West Hills Parkway would depend on the West Hills Parkway ramp option ultimately constructed, <u>but no acquisition of private property would be required under any of the options</u>. Under the Switchback Ramp Option, a proposed traffic signal and a continental crosswalk would be installed along West Hills Parkway where the ramp would connect to the existing sidewalk. 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,
- Installation of a new guard rail along the proposed widened sidewalk,
- Installation of chain-link fencing along a portion of the east side of the widened sidewalk,

- Installation of curb ramps at each corner of the West Hills Parkway/Carlton Oaks Drive intersection,
- Installation of continental crosswalks at the southern, eastern, and northern approaches to West Hills Parkway/Carlton Oaks Drive intersection to channel people to the existing Class II bike route along the western side of West Hills Parkway,
- Relocation of the existing traffic signal at the southeast corner of the West Hills Parkway/Carlton Oaks Drive intersection, and
- Re-striping of portions of the roadway to accommodate the proposed roadway improvements.

Roadway modifications to West Hills Parkway under the Linear Ramp Option would be the same as those identified above for the Curvilinear Ramp Option, but the area/length of widened sidewalk and associated roadway improvements (e.g., new guardrail and re-striping) could be reduced since the ramp connect would occur closer to the West Hills Parkway/Carlton Oaks Drive intersection. Regardless of what ramp option is constructed, these roadway improvements along West Hills Parkway would not impact the existing transportation network. The number of lanes, configuration of lanes at the West Hills Parkway/Carlton Oaks Drive intersection, and capacity of this roadway segment would not change. Furthermore, the project does not include any components that would result in substantial long-term traffic generation. Some additional trips may occur in the project area from maintenance vehicles and vehicles driving to the area to use the proposed facility. These additional trips, however, would not contribute to a substantial traffic increase. While construction activities would likely generate a small number of trips associated with construction equipment and worker vehicles, these trips would be temporary during the construction period, and would not be considered substantial in relation to the existing traffic load in the project vicinity. Accordingly, the proposed roadway improvements to West Hills Parkway would not conflict with City of San Diego standards for roadway segment and intersection level of service because the roadway capacity would not be exceeded and existing levels of service would not decrease. Therefore, the proposed project would not conflict with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit. There is no impact.

b. Would the project conflict with an applicable congestion management program, including, but not limited to, level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

No Impact. SANDAG opted out of the State Congestion Management Program in 2009 per Assembly Bill 2419; there is no applicable congestion management program for the project area. As discussed above in Section 7.16(a), the proposed bike path would improve the performance of the circulation system and contribute to reduced vehicular miles traveled by providing an alternative to single occupancy vehicle commuting and increasing the amount of Class I

bikeways within the region. Therefore, the project would not conflict with an applicable congestion management program. There is no impact.

c. Would the project result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

No Impact. The proposed project would not include any aviation components or structures where height would be an aviation concern. Thus, the proposed project would not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks. There is no impact.

d. Would the project substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. The proposed bicycle facility would not increase hazards along nearby roadways. The bike path would be constructed as a Class I facility, which entails a path within an exclusive right-of-way separated from motorists. The eastern end of the bike path would begin at an existing dirt trail within Mast Park, and the west end would connect to the existing sidewalk along West Hills Parkway. A stop sign would be installed at the western terminus to alert people using the bike path of possible cross traffic and to yield to people on the West Hills Parkway sidewalk. As identified in Section 7.16(a), additional roadway improvements along West Hills Parkway between where the ramp at the west end of the project alignment would connect to the existing sidewalk and the West Hills Parkway/Carlton Oaks Drive intersection are proposed, depending on the West Hills Parkway ramp option ultimately constructed. Such roadway improvements would not create traffic hazards because they would safely transition bicyclists and pedestrians from the bike path to the sidewalk. A crosswalk and curb ramps may also be installed at the West Hills Parkway/Carlton Oaks Drive intersection to safely channel bicyclists and pedestrians through the intersection and to the existing bicycle route on the other side of West Hills Parkway. Additionally, enhanced bicyclist safety would be provided through the construction of a separate transportation facility for bicyclists and pedestrians. Therefore, the proposed project would not substantially increase hazards due to a design feature or incompatible uses. This impact is less than significant.

e. Would the project result in inadequate emergency access?

No Impact. Primary access to all major roads would be maintained during construction and operation of the proposed project. As discussed in Section 7.16(a), roadway modifications are proposed along a segment of West Hills Parkway between where the ramp at the west end of the project alignment would connect to the existing sidewalk and the West Hills Parkway/Carlton Oaks Drive intersection, depending on the West Hills Parkway ramp option ultimately constructed. Modifications to West Hills Parkway would not require road closures; the roadway would remain open during construction of the roadway modifications. Additionally, a traffic control plan required by the City of San Diego would be implemented during project construction that would include provisions to maintain vehicle access surrounding roadways for emergency vehicles. Therefore, the proposed project would not result in inadequate emergency access. There is no impact.

f. Would the project conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

No Impact. The project would not conflict with adopted policies, plans, or programs regarding public transit, bicycle, and pedestrian facilities, and in many ways would support such programs. As discussed under Section 7.10(b), *San Diego Forward: The Regional Plan*; the *City of San Diego General Plan*; *Riding to 2050, San Diego Regional Bicycle Plan*; *East Elliott Community Plan*; and *San Diego River Park Master Plan* all support the development of bikeways that improve connectivity and provide a viable travel alternative choice. In addition, as discussed in Section 7.16(d), the project would improve bicyclist and pedestrian safety by providing a separated path from the roadway. The proposed project would contribute toward achieving the goals of adopted policies, plans, and programs supporting public transit, bicycle, and pedestrian facilities within the area. Therefore, 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. There is no impact.

Environmental Is	sue F	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the proposed project:					
a. Exceed wastewater treatment requ applicable Regional Water Quality	irements of the V Control Board?				
b. Require or result in the construction wastewater treatment facilities or a facilities, the construction of which significant environmental effects?	on of new water or expansion of existing h could cause				
c. Require or result in the construction water drainage facilities or expans facilities, the construction of which significant environmental effects?	on of new storm ion of existing h could cause				
d. Have sufficient water supplies ava project from existing entitlements new or expanded entitlements need	ilable to serve the and resources, or are ded?				
e. Result in a determination by the w provider which serves or may serv has adequate capacity to serve the demand in addition to the provider commitments?	astewater treatment re the project that it project's projected r's existing				
f. Be served by a landfill with sufficient capacity to accommodate the project disposal needs?	ient permitted ect's solid waste				
g. Comply with federal, state, and loo regulations related to solid waste?	cal statutes and				

7.17 <u>Utilities and Service Systems</u>

a. Would the project exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

No Impact. The proposed project would not generate wastewater. Thus, the project would not exceed wastewater treatment requirements of the RWQCB. There is no impact.

b. Would the project require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant Impact. Construction of the proposed bicycle facility would involve minimal water use associated with watering for dust control and soil compaction associated with grading activities during construction. Revegetation of the manufactured slopes along the berm may also require temporary and permanent irrigation. Operation of the bike path may require minimal water use for infrequent maintenance activities, such as pavement sweeping. The limited demand for water associated with irrigation and infrequent maintenance activities would not be sufficient to require construction of new water treatment facilities. As the project would not generate wastewater, it would not require the construction of new wastewater treatment facilities. Therefore, the proposed project would not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects. This impact is less than significant.

c. Would the project require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

Less Than Significant With Mitigation Incorporated. Proposed drainage facilities include three low-flow drainage crossings and a drainage ford within the portion of the improved bike path that traverses Mast Park West and a brow ditch at the west end near the West Hills Parkway connection (for any of the West Hills Parkway connection options). The proposed low-flow drainage crossings and drainage ford would impact sensitive vegetation (southern riparian forest and southern willow scrub), and the brow ditch at the western end would impact sensitive upland vegetation (broom baccharis-dominated sage scrub and flat-topped buckwheat scrub) under any of the West Hills Parkway connection options. Therefore, the proposed project could potentially cause significant environmental effects as a result of the construction of new storm water drainage facilities. Implementation of mitigation measures BIO-4, BIO-5, and BIO-11 identified in Section 7.4 would avoid or substantially lessen impacts resulting from the proposed drainage facilities. This impact is less than significant with mitigation incorporated.

d. Would the project have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

Less Than Significant Impact. Operation of the bike path would not generate a long-term demand for water use. As discussed in Section 7.17(b), revegetation of the manufactured slopes along the berm may require temporary and permanent irrigation and infrequent maintenance activities of the bike path could require a negligible amount of water. The limited demand for water would not require construction or expansion of existing water supply facilities or

entitlements. Therefore, the proposed project would have sufficient water supplies available to serve the project from existing entitlements and resources, and new or expanded entitlements would not be needed. This impact is less than significant.

e. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

No Impact. The project would not have any impact on an existing wastewater treatment provider, as the project would not generate wastewater. Therefore, the project would result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments. There is no impact.

f. Would the project be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?

Less Than Significant Impact. Construction activities may generate solid waste that would be disposed of in a landfill. However, the contractor would be required to dispose of any and all construction waste through appropriate coordination with landfills in accordance with existing laws and regulations governing the types of waste that are allowed to be disposed of in landfills. While some users of the bike path may have solid waste to dispose of while using the facility (e.g., food wrappers, beverage bottles, etc.), no significant quantity of trash would be generated and thus, the project would not significantly impact regional landfills. Therefore, the proposed project would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs. This impact is less than significant.

g. Would the project comply with federal, state, and local statutes and regulations related to solid waste?

No Impact. The proposed project would comply with all applicable federal, state, and local statutes and regulations related to solid waste. There is no impact.

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the proposed project have:				
a. the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?				
b. the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?				
c. impacts that are individually limited, but cumulatively considerable ("cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?				
d. environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			•	

7.18 <u>Mandatory Findings of Significance</u>

a. Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant With Mitigation Incorporated. Implementation of the proposed project would not substantially reduce the habitat for fish or wildlife. While construction of the project would impact native vegetation, the loss of vegetation would not result in a substantial reduction of habitat for fish and wildlife because (1) the amount of project impacts to native vegetation would be relatively small as discussed in Section 7.4(b); (2) impacts to wetlands would be minimized; and (3) impacts to uplands would occur within otherwise disturbed land that does not exhibit high quality wetland and upland habitat. The loss of habitat would not be sufficient to cause fish or wildlife populations to drop below self-sustaining levels. Furthermore, the project would mitigate for the loss of sensitive vegetation and wetlands (mitigation measures BIO-4, BIO-5, BIO-6, and BIO-11) and additional measures would be implemented during project construction to mitigate for indirect impacts to sensitive vegetation (mitigation measures BIO-7 through BIO-10). Impacts to special status and nesting birds would be minimized by implementing construction activity setbacks in the vicinity of active nests (mitigation measures

BIO-1, BIO-3, and BIO-12) and mitigating for loss of riparian habitat within USFWS-designated critical habitat for least Bell's vireo (mitigation measure BIO-2).

No impacts to important examples of major periods of California history would occur. As discussed in Section 7.5, no historical or archaeological sites are located within the direct APE, and none in the indirect APE or vicinity would be impacted by project implementation. Impacts related to unexpected discovery of cultural artifacts during construction activities would be avoided through implementation of mitigation identified in Section 7.5 (mitigation measure CUL-1).

b. Does the project have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals?

Less Than Significant Impact. The proposed project would be consistent with local and regional plans that support implementation of regional multi-modal transportation facilities, including regional bikeways such as the SDRT. The proposed project would implement a segment of the planned SDRT that is envisioned in regional transportation and local land use plans. The proposed facility has been designed to minimize environmental effects to the extent feasible by constructing the facility along an existing DG trail and on and adjacent to an existing berm/informal dirt trail along the edge of a golf course adjacent to the San Diego River. The proposed project would provide a transportation and recreational facility along a scenic river corridor that would substantially keep the scenic qualities and environmental resources of the river corridors. Therefore, the proposed project does not have the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals. This impact is less than significant.

c. Does the project have impacts that are individually limited, but cumulatively considerable ("cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact With Mitigation Incorporated. The proposed project's incremental lighting impacts on nighttime views and sensitive habitat would be minimized through project design features such as proper placement and shielding of the lights. Incremental water quality impacts would be reduced through compliance with applicable storm water regulations. Air quality and GHG emissions would be incremental but temporary as they would only occur during project construction. Incremental impacts to biological resources would not be cumulatively considerable due to implementation of mitigation measures described in Section 7.4 (BIO-1 through BIO-12). In combination with the related impacts of other past, present, and reasonably foreseeable projects in the area, the project's incremental contribution would not be cumulatively considerable. This impact is less than significant with mitigation incorporated.

d. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact. With the adherence to regulatory codes, ordinances, regulations, standards, and guidelines, construction and operation of the proposed project would not have environmental effects which will cause substantial adverse effects on human beings either directly or indirectly. This impact is less than significant.

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