

Land Development Review Division (619) 446-5460 FINAL RECIRCULATED ENVIRONMENTAL IMPACT REPORT

Project No. 2982 SCH No. 1999071104

SUBJECT: El Camino Real Road Bridge: SITE DEVELOPMENT PERMIT (SDP) for the road modifications to a segment of El Camino Real that runs from Via de la Valle to the north to San Dieguito Road to the south. This portion of El Camino Real is approximately 2,400 feet long, 23 feet wide, has one travel lane in each direction, and has no shoulders, bike lanes, or pedestrian walkways. The road segment includes a bridge over the San Dieguito River that is 340 feet long and 27 feet wide (24 feet wide curb to curb on the concrete travel surface, with 1.5-foot-wide raised concrete curbs on each side). The City proposes to modify the segment of El Camino Real between Via de la Valle and San Dieguito Road and replace the bridge in order to improve the structural integrity of the bridge over the San Dieguito River, alleviate problems associated with high flood events, improve pedestrian and vehicular access to nearby coastal and recreational resources, relieve traffic congestion, and improve consistency with the adopted land use plan and adopted Circulation Element in the project area. The project is zoned within the AR-1-1 and is located in the North City Future Urbanizing Area Framework Plan. Applicant: City of San Diego, Public Works Department

UPDATE: <u>6/22/2016</u> Revisions and/or minor corrections have been made to this document, in response to comments submitted, when compared to the draft Environmental Impact Report. In accordance with the California Environmental Quality Act, Section 15088.5, the addition of new information that clarifies, amplifies, or makes insignificant modifications does not require recirculation, as there are no new impacts and no new mitigation identified. An environmental document need only be recirculated when there is the identification of new significant environmental impacts or the addition of a new mitigation measure required to avoid a significant environmental impact. The modifications within the final environmental document do not affect the analysis or conclusions of the Environmental Impact Report. All revisions are shown in strikethrough and/or underline format.

CONCLUSIONS:

Based on the analysis conducted for the project described above, the City has prepared the following Recirculated Final Environmental Impact Report (EIR) in accordance with the California Environmental Quality Act (CEQA) to inform public agency decision-makers and the public of significant environmental effects that could result if the project is approved and implemented, identify possible way to minimize the significant effects, and describe reasonable alternatives to the project (State CEQA Guidelines Section 15121). Based on the analysis of the seven build alternatives in Section 3.0, impacts determined to be significant and unmitigated are as follows:

Traffic/Circulation (Traffic hazards due to non-standard designs): Road Capacity and Bicycle Safety alternatives and **Traffic/Circulation** (substantial restriction in access to publicly or privately owned land): Road Capacity Alternative. **Visual/Aesthetics** (change of character from current bridge structure, blocking westward view of the river due to fencing): All build alternatives, and **Visual/Aesthetics** (neighborhood character and development feature impacts from retaining walls): Road Capacity and Bicycle Safety alternatives.

It is further demonstrated in the attached EIR that the proposed project would result in potentially significant but mitigable impacts to the following issue areas:

Land Use (MHPA): All build alternatives, Historical Resources (potential for buried cultural resources): All build alternatives, Hydrology/Water Quality (modification of drainage patterns): All build alternatives, Paleontological Resources (disturbance of formation with potential to contain fossils): All build alternatives, Biological Resources (sensitive species, wetlands and waters of the U.S. and invasive species): All build alternatives.

The Eastern Alignment Alternative is the City's preferred alternative. Based on the analysis in Section 3.0, impacts determined to be significant and unmitigated for the Eastern Alignment Alternative are as follows:

Visual/Aesthetics (change of character from current bridge structure, blocking westward view of the river due to fencing).

It is further demonstrated in the attached EIR that the proposed project would result in potentially significant but mitigable impacts to the following issue areas for the Eastern Alignment Alternative:

Land Use (MHPA), Historical Resources (potential for buried cultural resources), Hydrology/Water Quality (modification of drainage patterns), Paleontological Resources (disturbance of formation with potential to contain fossils), Biological Resources (sensitive species, wetlands and waters of the U.S. and invasive species). The following issues were analyzed throughout all of the build alternatives, including the Eastern Alignment Alternative and significant impacts were not identified and mitigation was not required:

Farmlands, Public Utilities/Services, Geology/Seismicity/Soils, Air Quality, Noise and Greenhouse Gas Emissions.

MITIGATION, MONITORING AND REPORTING PROGRAM:

A series of mitigation measures are identified within each issue area discussion in Section 3.0 of the EIR to reduce environmental impacts. Mitigation measures are proposed to reduce Project impacts; however, not to below a level of significance. The mitigation measures are also fully contained in Section 6.0, Mitigation Monitoring and Reporting Program.

RECOMMENDED ALTERNATIVES FOR REDUCING SIGNIFICANT UNMITIGATED IMPACTS:

Based on the requirement that alternatives reduce significant impacts associated with the proposed project, the EIR considers the following Alternatives, which are further detailed in the Executive Summary, Section 3.0, and Section 5.0 of the EIR:

- 1. No Build Alternative
- 2. Central Alignment Alternative
- 3. Western Alignment Alternative
- 4. Eastern Alignment Alternative
- 5. Roundabout Alternative
- 6. Lower Elevation Alternative
- 7. Road Capacity Alternative
- 8. Bicycle Safety Alternative

Environmentally Superior Alternative

Under CEQA Guidelines Section 15126.6(e)(2), if the No Project Alternative is the environmentally superior alternative, the EIR must also identify which of the other alternatives is environmentally superior. The EIR identified the Eastern Alignment Alternative as the environmentally superior alternative because it meets the project alternatives while resulting in a reduction to impacts when compared to the other alternatives.

PUBLIC REVIEW DISTRIBUTION:

The following individuals, organizations, and agencies received a copy or notice of the DEIR and were invited to comment on its accuracy and sufficiency:

United States Government U.S. Fish and Wildlife Service (23) U.S. Environmental Protection Agency (19) U.S. Army Corps of Engineering (26) State of California Caltrans District 11 (31) California Department of Fish and Wildlife (32) Regional Water Quality Control Board (44) State Clearinghouse (46) City of San Diego Mayor's Office (91) Council President Lightner, District 1 (MS 10A) Councilmember Zapf, District 2 (MS 10A) Councilmember Gloria, District 3 (MS 10A) Councilmember Cole, District 4 (MS 10A) Councilmember Kersey, District 5 (MS 10A) Councilmember Cate, District 6 (MS 10A) Councilmember Sherman, District 7 (MS 10A) Councilmember Alvarez, District 8 (MS 10A) Council President Pro Tem Emerald, District 9 (MS 10A) Historical Resources Board (87) **Transportation Storm Water Department** James Bajet (MS 608) City Attorney (MS 59) **Development Services Department** Jeff Szymanski (MS 501) Anita Eng (MS 501) Kerry Santoro (MS 501) Conan Murphy (MS 501) Terre Lien (MS 501) Patrick Thomas (MS 501) Louis Schultz (MS 501) Farah Mahzari (MS 501) Morris Dye (MS 501) **Planning Department** Holly Smit-Kicklighter Dan Monroe **Environmental Services Department Burton Ewert** Public Works Department Jayna Straughn (MS 908A) Brad Johnson (MS 908A) Library Dept.-Gov. Documents MS 17 (81) Carmel Valley Branch Library (81f) Other Carmel Valley Community Planning Board (350)

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San Dieguito River Park (116) Metropolitan Transit System (112) San Diego Gas and Electric (114) Sierra Club (165) San Diego Audubon Society (167) Jim Peugh (167A) California Native Plant Society (170) Wetland Advisory Board (171) Endangered Habitat League (182 and 182A) South Coastal Information Center @ San Diego State University (210) San Diego Historical Society (211) Frank Brown (216) Carmen Lucas (206) Clint Linton (215b) San Diego Archaeological Center (212) Save Our Heritage Organization (214) Ron Christman (215) Campo Band of Mission Indians (217) San Diego County Archaeological Society (218) Kumeyaay Cultural Heritage Preservation (223) Kumeyaay Cultural Repatriation Committee (225) Native American Distribution (225 A-S) San Diego Natural History Museum (166)

RESULTS OF PUBLIC REVIEW:

- () No comments were received during the public input period.
- () Comments were received but did not address the accuracy or completeness of the Draft EIR. No response is necessary and the letters are attached at the end of the EIR.
- (X) Comments addressing the accuracy or completeness of the Draft EIR were received during the public input period. The list of commenters is located immediately after the EIR Distribution List. The letters and responses are included after the Conclusions.

Copies of the DEIR, the Mitigation Monitoring and Reporting Program, and any technical appendices may be reviewed in the office of the Development Services Department, Carmel Valley Branch Library, or online at

http://clerkdoc.sannet.gov/Website/publicnotice/pubnotceqa.html. Additionally the document can be purchased for the cost of reproduction.

Kerry Santoro Deputy Director Development Services Department 9/25/2015

Date of Draft Report

Analyst: Jeff Szymanski

6/22/2016

Date of Final Report

The City received comment letters received during the public review period from the following agencies, organizations, and individuals: The letters and responses are located immediately after the Conclusions.

AGENCIES

Letter A	California Coastal Commission
Letter B	Viejas Tribal Government
Letter C	Pala Tribal Historic Preservation Office
Letter D	U.S. Fish and Wildlife Service and California Department of Fish and Wildlife

ORGANIZATIONS

Letter E	San Dieguito River Park Joint Powers Authority
Letter F	Carmel Valley Community Planning Board

- Letter G San Dieguito Community Planning Group
- Letter H San Diego Land Lawyers/Surf Cup Sports

INDIVIDUALS

Letter I	Cory Ha'o
Letter J	Nancy Hand

EL CAMINO REAL BRIDGE/ROAD WIDENING PROJECT

This document, the Final Recirculated Environmental Impact Report (Final PEIR) for the City of San Diego El Camino Real Bridge/Road Widening Project (SCH #1999071104/Project No. 2982), discusses the potentially significant issues involved with the project. A Draft EIR was circulated in 2006 but was not certified. The City conducted an extensive and lengthy outreach effort to the public and resource agencies for several years following close of the 2006 comment period. Based on that effort, changes were made to the alternatives and the proposed mitigation plan. In order to provide a meaningful opportunity for the public to comment on these changes, the entire EIR was recirculated for public review from September 26, 2015 to November 20, 2015. During the public review period, letters of comment were received from agencies, organization, and individuals. Any corrections, deletions, or revisions to the Recirculated Draft EIR discussed in the responses have been incorporated into this Final EIR.

Ten letters of comment to the Recirculated Draft EIR were received from the following agencies, organizations, and individuals. These letters are reproduced in full with numbers to delineate individual comments and corresponding responses in Attachment 1. Responses to the comments received during public review of the Recirculated Draft EIR have been prepared in a side-by-side format to track the comment with the City response and are included in the Final EIR.

А	California Coastal Commission	RTC-3
В	Viejas Tribal Government	RTC-11
С	Pala Tribal Historic Preservation Office	RTC-12
D	U.S. Fish and Wildlife Service and California Department of Fish and Wildlife .	RTC-13
E	San Dieguito River Park Joint Powers Authority.	RTC-34
F	Carmel Valley Community Planning Board	RTC-43
G	San Dieguito Community Planning Group (E-mail)	RTC-48
Н	San Diego Land Lawyers/Surf Cup Sports	RTC-49
Ι	Cory Ha'o	RTC-54
J	Nancy Hand (E-mail)	RTC-56

Subsequent to distribution of the Recirculated Draft EIR and responses to comment letters, text and figures and information have been updated and clarified in the Final EIR. These updates and changes are explained below, and specific revisions to the text are indicated by strikeout (deleted) and underline (inserted) markings in the Final EIR.

Appendix C now includes two additional sets of meeting notes related to the proposed project and adjacent areas discussed with the Wildlife Agencies in 2005 and 2007. Appendix D, *Bridge Construction Methodology & Associated Noise Reduction Measures, and Biological & Hydraulic Impacts*, was reproduced without several pages at the end of this report. The pdf has been corrected in the Final EIR. The full report was also correctly included in full as Appendix I of the Natural Environment Study (NES) of the Recirculated Draft EIR. In addition, Volume III of the Final EIR includes a report prepared by Rick Engineering (*Hydrologic and Hydraulic Report for El Camino Real Road/Bridge Widening Project on the San Dieguito River [Construction Phase]*). This report, dated May 13, 2013, is a more detailed hydraulic report for the issue of temporary impacts contained in the *Bridge Construction Methodology & Associated Noise Reduction Measures, and Biological & Hydraulic Impacts* (2013) referenced in Sections 3.7 and 3.12 and included as

Appendix D to the Recirculated Draft EIR and Appendix I of the NES for the Recirculated Draft EIR.

In response to comments from the California Coastal Commission, the Final EIR now reflects that the entire project will require a Coastal Development Permit from the Coastal Commission. This is due to the project site including portions and features located in Subarea II of the North City Future Urbanizing Area where no subarea plan has ever been certified for Subarea II.

Following public review of the Recirculated Draft EIR, it was determined that wetland and riparian enhancement for the constructed Fairbanks Ranch Project is proposed for implementation prior to the commencement of construction for the proposed road and bridge improvements. If implemented, this area would overlap an approximately 1.7-acre portion of the road and bridge project footprint. Although the bridge and road footprint has not changed, projected mitigation requirements have been calculated for the Eastern Alignment, which is the City's Preferred Alternative and the Environmentally Superior Alternative. A new Table 1, Projected Mitigation Requirements for the Eastern Alignment Alternative with Fairbanks Ranch Mitigation Site Considered, has been added to the Final EIR, and mitigation for impacts to wetland habitats would require additional offsite mitigation on up to 10.8 acres of a parcel in Gonzales Canyon immediately south of El Camino Real. The calculations do not show a new or more severe substantial environmental impact resulting either from the project or from a mitigation measure, as the project footprint has not changed and the current mitigation measures remain applicable.

Table 1		
Projected Mitigation Requirements for the Eastern Alignment Alternative		
with Fairbanks Ranch Mitigation Area Considered		

Vegetation Community	Impacts (acres)	Mitigation Ratio	Mitigation Requirement (acres)
Wetland impacts associated with road and bridge improvement			
Disturbed southern willow scrub (DSWS)	0.12	3:1	0.36
Mulefat scrub (MFS)	0.29	3:1	0.87
Disturbed mulefat scrub (DMFS)	0.25	3:1	0.75
Disturbed wetland (DW)	0.07	2:1	0.14
Tamarisk scrub	0.003	2:1	0.006
Subtotal DSWS, MFS, MFS, DMFS, DW	0.733		2.126
Coastal freshwater marsh (CFM)	1.1921	4:1	4.7684
Disturbed coastal freshwater marsh (DCFM)	0.384	4:1	1.52
Subtotal CFM, CFM, DCFM	1.5761		6.2884
Disturbed southern coastal salt marsh (CSM)	2.27	4:1	9.08
Subtotal CSM	2.27		9.08
Subtotal wetland impacts associated with road and bridge improvement			17.4944
Wetland impacts associated with JPA Mitigation Site			
Disturbed southern willow scrub	0.07	1:1	0.07
Alkali marsh	0.48	1:1	0.48
Disturbed wetland	0.23	1:1	0.23
Tamarisk scrub	1.22	1:1	1.22
Tamarisk scrub (berm)	0.11	2:1	0.22
Subtotal wetland impacts associated with JPA Mitigation Site	2.11	1:1	2.22
Total wetland impacts and mitigation	6.6891		19.7144

Table 1		
Projected Mitigation Requirements for the Eastern Alignment Alternative		
with Fairbanks Ranch Mitigation Area Considered		

Vegetation Community	Impacts (acres)	Mitigation Ratio	Mitigation Requirement (acres)
Upland impacts associated with road and bridge improvement			
Disturbed Diegan coastal sage scrub – coastal form	0.44	1:1	0.44
Disturbed Diegan coastal sage scrub – Baccharis dominated	0.0002	1:1	0.0002
Disturbed Land	2.94	0:1	0.0
Eucalyptus woodland	0.285	0:1	0.0
Ornamental	0.49	0:1	0.0
Bare ground	0.37	0:1	0.0
Urban/Developed	8.44	0:1	0.0
Subtotal upland impacts associated with road and bridge improvement	17.67		0.4402
Upland impacts associated with JPA Mitigation Site			
Disturbed Diegan coastal sage scrub – coastal form (berm)	0.03	1:1	0.03
Disturbed Diegan coastal sage scrub – <i>Baccharis</i> dominated (berm)	1.13	1:1	1.13
Disturbed Diegan coastal sage scrub – Baccharis dominated	13.17	1:1	13.17
Disturbed Land	3.41	0:0	0.0
Non-native grassland	0.04	1:1	0.04
Subtotal upland impacts associated with JPA Mitigation Site	17.81		14.37
Total upland impacts and mitigation	35.48		14.8102
ORIGINAL TOTAL IMPACTS AND MITIGATION	42.1691		34.5246
ADJUSTED MITIGATION CALCULATION*			
Impacts outside Fairbanks Ranch Mitigation Site	40.4691	0:1-4:1	<i>30.1306</i> †
Impact within Fairbanks Ranch Mitigation Site	1.70	4:1	6.80
PROJECTED TOTAL IMPACTS AND MITIGATION*	42.1691		36.9306

*The adjusted mitigation calculation assumes the following impacts fall within the boundary of the Fairbanks Ranch mitigation area: 0.29 acre mulefat scrub, 0.04 acre disturbed mulefat scrub, 0.80 acre coastal freshwater marsh, 0.04 acre disturbed coastal freshwater marsh, 0.06 acre disturbed Diegan coastal sage scrub – coastal form, 0.06 acre disturbed land, 0.22 acre eucalyptus woodland, and 0.18 acre urban/developed.

[†]For the adjusted mitigation calculation, the impacts and associated mitigation for each of these vegetation categories were subtracted from the original road and bridge subtotals. Wetland and upland impacts required for the road and bridge were then re-calculated separately from wetland and upland impacts for the road and bridge that overlap with the Fairbanks Ranch mitigation site.

Mitigation for road and bridge impacts was calculated at the ratios listed above. The adjusted wetland mitigation needed for road and bridge improvements subtotaled to 13.1604 acres; total wetland mitigation (including JPA mitigation site) was 15.3804 acres. The adjusted subtotal for upland impacts associated with road and bridge improvements was 0.3802; total upland mitigation (including JPA mitigation site) was 14.7502 acres. In total, project impacts outside of the Fairbanks Ranch mitigation site require mitigation of 30.1306 acres. Mitigation for project impacts that fall within the boundary of the Fairbanks Ranch mitigation site was calculated at a 4:1 ratio for a total of approximately 6.8 acres.

Source: ICF/Nordby 2015 and RECON 2016

Finally, several figure revisions were requested for clarification and accuracy. In response to comments received during the public review from the U.S. Fish and Wildlife Service, Figures 2-24 through 2-29 have been revised in the Final EIR to reflect the correct dates for the nesting season: February 1 to September 30. Also, in response to comments received during the public review from the San Dieguito River Park JPA the Coast to Crest Trail undercrossing has been added to the plan profiles in the Final EIR. Therefore, Figures 2-5 through 2-10 and 2-22 of the Final EIR have been revised to show the undercrossing.

The revisions to the Final EIR include typographical corrections and requested figure and text revisions. The changes listed above do not change the conclusions of the EIR. No new significant impacts have been identified. All other mitigation requirements for impacts remain unchanged and will be implemented as stated in the Final EIR and Mitigation Monitoring and Reporting Program contained in Section 6.0 of the Final EIR.

The standards for recirculation as defined in CEQA Statutes Section 21092.1, and CEQA Guidelines Section 15088.5, require that if changes may result in new or increased levels of environmental impacts, or if "significant new information" is added to the Recirculated Draft EIR in response to comments, the EIR may be required to be recirculated for additional review and comments. In accordance with these Guidelines, the refinements and clarifications due to comments received on the Recirculated Draft EIR do not result in the need to recirculate the EIR. The revisions to the Final EIR clarify references, terms, and analysis as well as the process for review and permitting of the proposed Project. Information added to reflect the mitigation area should the Fairbanks Ranch Mitigation Area be approved and implemented prior to the implementation of this project does not result in any new significant impacts or significant impacts of greater extent than those disclosed for the overall project; nor does the additional analysis result in any new mitigation measures or alternatives that the City is declining to adopt. The project analyzed within the Recirculated Draft EIR was complete and has sufficient detail to provide adequate review. The new information and refinements are not significant and would not deprive the public of a meaningful opportunity to comment, as they existed previously and would not result in increased or new impacts not previously identified. Therefore, recirculation of the Draft EIR is not required.

ATTACHMENT 1

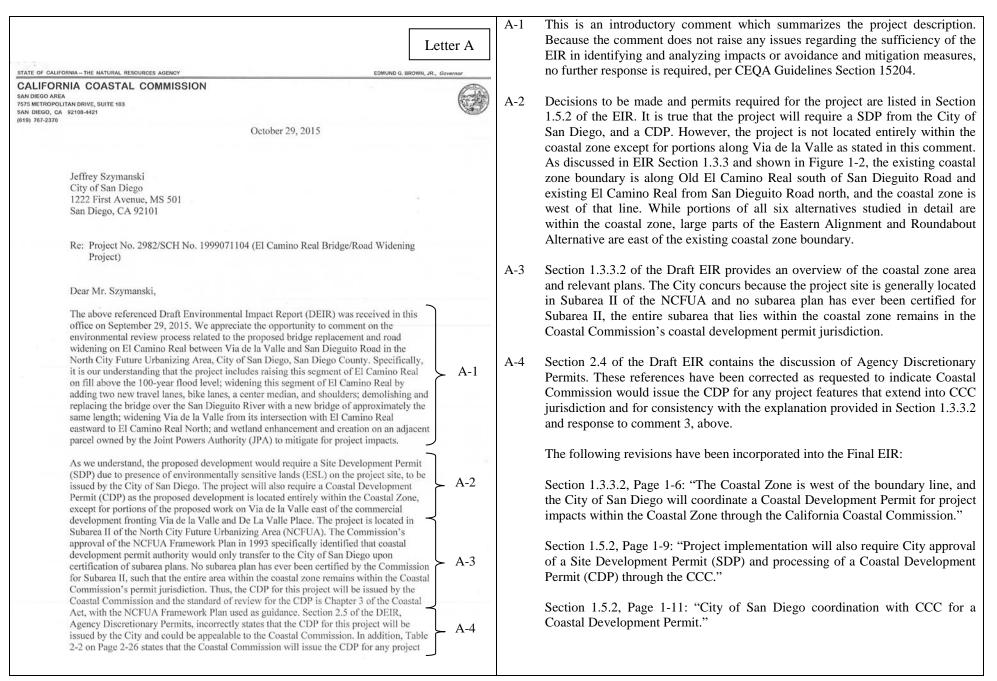
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EL CAMINO REAL BRIDGE/ROAD WIDENING PROJECT Letters of Comment and Responses

Letters of comment to the Draft EIR were received from the following agencies, organizations, and individuals. Several comment letters received during the Draft EIR public review period contained accepted revisions that resulted in changes to the final EIR text. These changes to the text are indicated by strike-out (deleted) and underline (inserted) markings. The letters of comment and responses follow.

А	California Coastal Commission	RTC-3
В	Viejas Tribal Government	RTC-11
С	Pala Tribal Historic Preservation Office	RTC-12
D	U.S. Fish and Wildlife Service and California Department of Fish and Wildlife	RTC-13
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Ι	Cory Ha'o	RTC-54
J	Nancy Hand (E-mail)	RTC-56

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October 29, 2015 Page 2 features that extend into CCC jurisdiction, and incorrectly states that the City of San Diego will issue the CDP for this project. This table should be revised to clarify that the CDP for the entire project is within the Coastal Commission's permit authority. The incorrect coastal development permit jurisdiction is also cited on Page 1-6, 1-9, 1-11, 1- 17, and 3.1-3, and should be revised as previously stated. These errors were noted in Commission staff's comment letter on the 2006 DEIR for this project dated September 6, 2006. While the permit jurisdiction clarification as described in this 2006 letter is referenced on Pages 1-7 and 3.1-3, the DEIR still incorrectly describes the City of San Diego as the permitting authority for the CDP.	 A-4 (cont.) Section 1.6.1, Page 1-17: "Coastal Development Permit Jurisdiction maps C730.1 (42 of 44 and 44 of 44) indicate the project areas that are within the Coastal Zone. CCC permitting would be needed for any project features that extend into the Coastal Zone." Section 2.4, Page 2-25: "Project implementation will also require City approval of a Site Development Permit due to the presence of Environmentally Sensitive Lands (ESL; Process 4 action due to wetland deviations) and coordination with CCC for a Coastal Development Permit due to project features located in the Coastal Overlay Zone (Process 4 action)."
Commission staff's comment letter from 2006 also identified that this project may need to go through the Commission's Federal Consistency review, and that the effect of the proposed development on the Coastal Zone boundary will need to be assessed. The Commission's review of the CDP for this project could encompass Federal Consistency review, thus a separate approval may not be necessary. The Coastal Zone boundary follows the inland right-of-way of El Camino Real and Via de le Valle in this location. Pursuant to the certified Coastal Zone Boundary maps adopted by the Commission	Table 2-2: The row indicating an agency action related to "City of San Diego - Coastal Development Permit (Process 4 action)" has been removed from the table as the action related to the CCC for a Coastal Development Permit is covered in a previous row. Additionally, the reference to CCC jurisdiction applying only to project features extending into the Coastal Zone has been removed.
pursuant to Section 30103(b) of the Coastal Act, where the Coastal Zone boundary follows road or railroad rights-of-way, the boundary of the Coastal Zone shall be the inland boundary of the improved right-of-way as it exists as of January 1, 1977, or as modified by closure or additional improvement thereafter provided that it shall not be more than 100 yards inland from the center line. Thus, if the proposed development moves the existing inland right-of-way to the east on El Camino Real and to the south on Via de la Valle, the Coastal Zone boundary would adjust accordingly.	Section 3.1.1, Page 3.1-3: As shown in Figure 3.1-5, the Coastal Overlay Zone extends westward from the eastern edge of the right of way for Old El Camino Real and includes the San Dieguito River corridor west of El Camino Real. For all of the build alternatives (except portions of the Eastern Alignment Alternative and Roundabout Alternative that are east of the Coastal Zone), the road and bridge footprint would fall within areas requiring a CDP. For all build
The primary Coastal Act issues with the proposed development are impacts to biological resources, hydrology and flood hazards, water quality, visual resources, and public access from construction and permanent development of the project. These potential impacts are significant and extensive, and could not be fully reviewed by Commission staff within this comment period. Commission staff has several comments at this time, and reserves the opportunity to identify and address additional project impacts and request additional information as necessary during review of the CDP application for this project. All	alternatives, the wetlands mitigation proposed to be implemented on the JPA Mitigation Site adjacent to and west of El Camino Real and south of the river would also require the City to coordinate with the CCC for a CDP. As discussed in Section 1.3.3.2, according to the CCC's comment letter on the 2006 Draft EIR.
proposed impacts and mitigation measures will be thoroughly reviewed by Commission planning and technical staff, including the Commission's water quality, ecology, and coastal engineer experts at the time the City applies for a coastal development permit for this project.	A-5 Table 2-2 of the Draft EIR notes "Possible Federal Consistency Certification" as a Permit / Approval of the CCC, with a potential boundary shift as a triggering project feature.
As indicated in the DEIR, the San Dieguito River channel east of the subject El Camino Real bridge is approximately 300 feet wide, and west of the bridge varies from about 300 feet to 200 feet wide. During high flow, the floodwater spreads out of the main channel to a broad floodplain. The existing bridge crossing represents a constraint to fluvial flows within this broad floodplain, constricting the flow that periodically results in increased	A-6 The explanation regarding Section 30103(b) of the Coastal Act has been added to Section 1.3.3.2 for additional clarification. The following has been incorporated into the introduction to the description of the location of the Coastal Zone in the Final EIR:
flow velocities and scour. The proposed development is expected to increase existing 100-year flow velocities from the downstream end of the existing bridge to the upstream end of the river reach as modeled for the proposed bridge structure, further increasing the potential for bank erosion and scour. Raising this segment of El Camino Real on fill	Section 1.3.3.2, Page 1-6 "Pursuant to the certified Coastal Zone Boundary maps adopted by the Commission pursuant to Section 30103(b) of the Coastal Act, where the Coastal Zone boundary follows road or railroad rights-of-way,

the boundary of the Coastal Zone shall be the inland boundary of the improved right-of-way as it exists as of January 1, 1977, or as modified by closure or additional improvement thereafter provided that it shall not be more than 100 yards inland from the center line."

- A-7 This summary of primary Coastal Act issues that will be the focus of the CCC during processing of a CDP is noted. The Draft EIR addresses potential impacts to biological resources (Section 3.12), hydrology and flood hazards (Section 3.7), water quality (Section 3.7), visual resources (Section 3.3), and access (Section 3.2). Significance conclusions under CEQA are summarized in Table ES-1. Most significant impacts are mitigable with the exception of impacts on access by the Road Capacity alternative, and impacts on views by all alternatives due to fencing along the bridge trail. The future involvement of CCC staff in processing a CDP for the project is acknowledged. Because the comment does not raise any issues regarding the sufficiency of the EIR in identifying and analyzing impacts or avoidance and mitigation measures, no further response is required, per CEQA Guidelines Section 15204.
- A-8 This comment provides a summary of the existing conditions that is consistent with the information presented in the Draft EIR. Because the comment does not raise any issues regarding the sufficiency of the EIR in identifying and analyzing impacts or avoidance and mitigation measures, no further response is required, per CEQA Guidelines Section 15204.
- Existing and proposed hydraulic conditions are analyzed in Draft EIR A-9 Section 3.7.2.2, Floodplain Characteristics. Results for the 100-year condition are presented on page 3.7-14 and Table 3.7-2. The hydraulic modeling found that at all cross sections, proposed 100-year water surface elevations would be the same or lower than existing water surface elevations. As noted on page 3.7-20 of the Draft EIR, the proposed abutment steepening would offset the potential increase in 100-year water surface elevations to create a condition of "no rise" in 100-year water surface elevations with the road raised on fill across the floodplain. The comment that the proposed project would increase existing 100-year velocities from the downstream end of the existing bridge to the upstream end of the river reach as modeled is correct and discussed on page 3.7-14 of the Draft EIR. The EIR also explains that bank protection was installed previously along the south bank of the river for the expanded golf course in 2003, extending eastward from approximately 600 feet upstream (east) of the existing bridge; therefore, only the north bank of the river would be vulnerable to erosion, and bank protection is proposed as mitigation in Section 3.7.5 of the Draft EIR.

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across the floodplain, as proposed, could also increase 100-year water surface elevations upstream. The proposed project includes steepening of the abutments under the bridge from 1.5:1 to 2:1 to provide the additional capacity needed to offset the potential increase in water surface elevation upstream, and installation of buried bank protection along the north bank of the river to provide protection from erosion. During coordination meetings with the City and resource agencies on this project. Commission staff indicated that impacts to hydraulics could potentially be avoided by selecting an alternative with a wider bridge span, as the upstream channel could be widened and the upstream riprap could be removed in the future. In their CDP application, the City should identify how the width of the proposed bridge was determined to be appropriate to avoid these potential impacts and anticipate future changes to the upstream channel. Furthermore, the bridge span should be modeled to ensure that downstream impacts to existing and future restoration sites from increased erosion or sedimentation are avoided. The City should also demonstrate that water quality impacts to downstream habitat and wetland areas ≻ A-12 from temporary construction or the permanent project will be avoided, or minimized to the extent feasible and sufficiently mitigated, through implementation of temporary and permanent best management practices.

According to the DEIR, the preferred project alternative will impact approximately 4.6 acres of wetland habitat, approximately 0.44 acres of upland habitat, and approximately 4.6 acres of jurisdictional waters. Impacts to wetlands and sensitive habitats from the proposed project should be avoided, and may not be considered an allowable use under the Coastal Act. If the described impacts are approvable, then appropriate mitigation must be included with the project submittal. Mitigation is proposed to occur on the JPA Mitigation Site. The Commission typically requires a 4:1 mitigation ratio for impacts to wetland habitat, 3:1 for riparian vegetation, and 2:1 for upland vegetation. The proposed _ conceptual restoration plan should reflect these required mitigation ratios. Impacts to sensitive wildlife species that utilize the impacted habitat area, such as the light-footed clapper rail and least Bell's vireo, should be minimized to the extent feasible by avoiding construction during breeding seasons and minimizing construction noise. The City shouldsubmit recent habitat mapping, special species surveys, and a wetlands delineation with their CDP application.

The DEIR indicates that the project includes a cantilevered trail along the western edge ofthe new bridge to accommodate equestrian users, pedestrians, and bicyclists. According to the DEIR, this project component would cause unmitigable visual impacts as the trail would include fencing that would obstruct views of the San Dieguito River looking west. However, the DEIR also indicates that this project component would not be constructed unless funding from outside sources is identified. If this cantilevered trail and fencing is proposed, the City should provide a visual impact analysis of the fencing with an alternatives analysis of designs that minimize impacts to visual resources to the extent feasible. Any proposed bridge replacement and road widening project should include design elements to allow for non-motorized access for pedestrians and bicyclists.

In addition, the Commission is currently in the process of reviewing a road widening project for the segment of Via de la Valle between San Andres Drive and El Camino

- The proposed project involves steepening the abutments under the bridge A-10 abutment from an existing condition of approximately 2:1 to a steeper slope of 1.5:1 (not the opposite as stated in the comment). This change in condition under the bridge would provide the additional capacity needed to avoid increases in water surface elevation due to the proposed project. River channel widening is discussed in Section 5.1.4 of the Draft EIR. This discussion explains that during preliminary design in 1999, an alternative designated the "Wider Channel Alternative" was developed to avoid predicted increases in upstream 100-year water surface elevations caused by raising El Camino Real on embankment across the floodplain. However, subsequent detailed hydraulics analysis that focused on steepening the abutments under the bridge was conducted with topography that reflected 2004 conditions in the watershed. This modeling determined that the extensive river widening and bridge lengthening proposed for the Wider Channel Alternative in 1999 would not be necessary to achieve no net rise in 100-year water surface elevations. Section 5.1.4 notes that the potential impacts of extensive river widening were discussed with the permitting agencies at an Agency Coordination meeting on September 7, 2004 (see Appendix C of the Draft EIR for minutes of this meeting, which was attended by Ellen Lirley of the CCC). At this meeting the agencies agreed that extensive river widening could be eliminated as a feature of alternatives addressed in detail in the EIR and Environmental Assessment (EA), and the Wider Channel Alternative was eliminated from detailed consideration.
- This comment identifies information CCC will be requesting during processing A-11 of the CDP. Because the comment does not raise any issues regarding the sufficiency of the EIR in identifying and analyzing impacts or avoidance and mitigation measures, no further response is required, per CEQA Guidelines Section 15204.
- A-12 The project would not result in downstream impacts, including to existing and future restoration sites due to increased erosion or sedimentation. Existing and proposed hydraulic conditions are analyzed in Draft EIR Section 3.7.2.2, Floodplain Characteristics. Results for the 100-year condition are presented on page 3.7-14 and Table 3.7-2. The Draft EIR section summarizes information from the most recent hydraulic report for the project titled "Hydraulic Study for El Camino Real Bridge Project on the San Dieguito River," prepared by Rick Engineering Company, originally dated April 2006 and revised on March 12, 2012, incorporated by reference into the Draft EIR and included as Volume 3 of the Technical Reports. The technical report presents hydraulic modeling in detail. As summarized on page 3.7-14 of the Draft EIR, velocities predicted by the hydraulic model in the proposed 100-year condition are the same as existing conditions from River Station 1.979 to 2.231 (the downstream end of the river reach modeled). Velocities predicted by the hydraulic model in the proposed

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100-year condition are lower than existing conditions from River Station 2.341 to River Station 2.524 of the river reach modeled. This reduction is due to the lowering of the existing fallow agricultural fields in the southern channel overbank (area outside of the river channel) for mitigation, as well as the reduction in peak flow rate due to a portion of discharge exiting the channel through the proposed trapezoidal weir (located between River Station 2.524 and 2.590). Velocities higher than existing conditions were only predicted from the existing bridge upstream, where mitigation of adding bank protection along the northern bank is proposed. For 10-year flood conditions, hydraulic modeling indicated that velocities would be slightly depositional for most of this reach of the river for both existing and proposed conditions. The Draft EIR concludes that the minor reductions and increases to the velocities are not expected to adversely affect river hydraulics for the 10-year flood.

Impacts of the project on water quality in the San Dieguito River and Lagoon are addressed in Section 3.7.3.4 of the Draft EIR. This section summarizes results of the hydrologic study by Chang Consultants (Chang 2005), which addressed the issue of sediment transport in the river. The 2012 hydraulic report by Rick Engineering cited above includes two of the previous reports prepared by Chang Consultants (in June 2005 and November 2005) as attachments. Conclusions of potential water quality impacts, which are presented on page 3.7-30 of the Draft EIR, include that impacts to surface water quality during construction would be significant for all build alternatives because additional Best Management Practices (BMPs) may be required by the permitting agencies to protect clapper rail and their habitat upstream of the bridge, and these measures will be developed during permitting processes after completion of the EIR. Mitigation measure Hyd-2 on page 3.7-31 of the Draft EIR addresses potential BMPs to be incorporated into the project during design.

A-13 As summarized in Table 3.1-7, Consistency with Relevant Environmentally Sensitive Lands Regulations, in the Draft EIR, a bridge spanning the entire floodplain to avoid wetland impacts could not meet the existing grade at Via de la Valle, and therefore would not be technically feasible. Unavoidable impacts to wetlands would be mitigated with wetlands creation on the JPA Mitigation Site west of El Camino Real and south of the San Dieguito River at suitable ratios to achieve no-net-loss and with vegetation to provide in-kind functions and values. Coordination has occurred with U.S. Fish and Wildlife Service and California Department of Fish and Wildlife to solicit input on wetland impact avoidance. Where possible, input has been incorporated into the project. The bridge over the 100-year floodplain alternative is discussed in more detail as considered but rejected in Section 5.1.3 of the Draft EIR.

A-14	Table 3.12-8c in the Biological Resources section of the Draft EIR provides a summary of the proposed mitigation ratios for wetland habitat, riparian vegetation, and upland vegetation under the Eastern Alignment Alternative (see pages 3.12-47 and 3.12-48). The EIR explains that in some cases, mitigation is proposed at ratios that are lower than the City's guidelines. Such accounting has been proposed for disturbed vegetation (e.g., within the study area Diegan Coastal sage scrub, a Tier II Sensitive Upland Habitat by the City of San Diego, is of low ecological value) as well as impacts within the JPA's mitigation site (e.g., the conversion of isolated and degraded wetlands located to high-quality wetlands). All state and federal regulatory agencies involved with the mitigation plan have agreed to mitigation ratios for impacts that would occur at the JPA mitigation site is acceptable. This is discussed in Section 2.5.1, Project Development History on page 2-29 and Appendix C of the Draft EIR.
A-15	The conceptual restoration plan, included as Appendix I to the NES, is intended to guide on-site and off-site mitigation requirements pursuant to the mitigation measures discussed in the EIR.
A-16	Biological resources mitigation measures on page 3.12-58 of the Draft EIR include the following:
	A. No construction will occur within the river corridor during the clapper rail breeding season (February 1 – September 30).
	B. Noise from construction activities outside of the river corridor will not exceed 60 A-weighted decibels (dBA; one-hour) at the river corridor (or ambient, whichever is greater) during the light-footed clapper rail breeding season. If the noise limit is exceeded, the noise will be reduced by using temporary noise measures such as plywood barriers, equipment mufflers, or sound blankets.
A-17	This comment identifies information CCC will be requesting during processing of the CDP. Because the comment does not raise any issues regarding the sufficiency of the EIR in identifying and analyzing impacts or avoidance and mitigation measures, no further response is required, per CEQA Guidelines Section 15204.
A-18	This comment is a correct summary of information presented in the Draft EIR about the cantilevered trail. See also the response to comment #10 in the JPA letter.
A-19	See the response to comment #15 in the JPA letter.

A-20	As summarized in Table 2-1 and discussed in Section 2.2.2 of the Draft EIR, all build alternatives except the Road Capacity Alternative would include bicycle lanes on El Camino Real, and all build alternatives except the Road Capacity and Bicycle Safety alternatives would include a 22-foot-wide pedestrian walkway/parkway on both sides of the road. As discussed in Section 2.2.3 of the Draft EIR, for all alternatives, the segment of Via de la Valle improved as part of the proposed project would include bicycle lanes and a 22-foot-wide pedestrian walkway/ parkway on both sides of the widened road.
A-21	The project design presented in the Draft EIR accounts for the future widening of Via de la Valle; therefore, the project is compatible with the adjacent Via de la Valley road widening project. Detailed information will be available at the time that final construction drawings are submitted for approval.

LETTER

October 29, 2015 Page 4 Real, where the subject project's improvements to Via de la Valle will begin. The City will need to provide detailed information on how the subject project been designed to be A-21 cont. compatible with adjacent Via de la Valle road widening project. Again, thank you for the opportunity to review the recirculated draft EIR for the El Camino Real Bridge/Road Widening project. The final document will be consulted as This comment notes that the CCC will use the Recirculated EIR during the A-22 part of the Commission's analysis of the proposed development's consistency with the A-22 coastal development permit process. Because the comment does not raise any Coastal Act for the coastal development permit process. Please feel free to contact me issues regarding the sufficiency of the EIR in identifying and analyzing impacts with any questions. or avoidance and mitigation measures, no further response is required, per CEQA Guidelines Section 15204. Sincerely, Brittney Laver Coastal Program Analyst cc: Sherilyn Sarb, Coastal Commission Gabe Buhr, Coastal Commission

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have det a Kumey developr	ermined that th aay Cultural M nents such as i	ne project site is h onitor be on site inadvertent disco	"Viejas") has review has cultural significa for ground disturbin ivery of cultural artifi- t 619-659-2339 or e	nce or ties to Viej g activities to info acts, cremation si	as. Viejas Band rm us of any nev tes, or human re	request that w mains.	B-1
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Sincerely	6	1.1.1	· . · .			1. S.	
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B-1 The need for including Native American monitors during project construction is acknowledged, and this specific request for a Kumeyyaay Cultural Monitor is noted. Mitigation for cultural resources impacts in Section 3.4.5 of the Draft EIR includes the following language on page 3.4-8: "His-1 Due to the potential for buried cultural resources to be encountered on-site, a qualified archaeological monitor and a Native American monitor shall be present during project-related grading activities, including on the JPA Mitigation Site and the additional mitigation area identified for the Roundabout Alternative, should that alternative be selected."

LETTER

PALA TRIBAL HISTORIC PRESERVATION OFFICE PMB 50, 35008 Pala Temecula Road Pala, CA 92059 760-891-3510 Office 760-742-3189 Fax PALA THPO	
January 6, 2016 Jeffery Szymanski City of San Diego, Planning Dept. 1222 First Ave, MS 413 San Diego, CA 92101 Re: El Camino Real Bridge/ Road Widening Project Dear Mr. Szymanski: The Pala Band of Mission Indians Tribal Historic Preservation Office has received your notification of the project referenced above. This letter constitutes our response on behalf of Robert Smith, Tribal Chairman. We have consulted our maps and determined that the project as described is not within the boundaries of the recognized Pala Indian Reservation. The project is also beyond the boundaries of the recognized Pala Indian Reservation. The project is also beyond the boundaries of the recognized Pala Indian Reservation attivities as currently planned and we defer to the wishes of Tribes in closer proximity to the project area. We appreciate involvement with your initiative and look forward to working with you on future efforts. If you have questions or need additional information, please do not hesitate to contact me by telephone at 760-891-3515 or by e-mail at <u>seaughen@palatribe.com</u> . Sincerely, Jaard C. Gaughen, PhD Tribal Historic Preservation Officer Pala Band of Mission Indians ATTENTION: THE PALA TRIBAL HISTORIC PRESERVATION OFFICE IS RESPONSIBLE FOR ALL REQUESTS FOR CONSULTATION. PLEASE ADDRESS CORRESPONDENCE TO SHASTA C. GAUGHEN AT THE ABOVE ADDRESS. IT IS NOT NECESSARY TO ALSO SEND NOTICES TO PALA TRIBAL CHARMAN ROBERT SMITH.	C-1 This comment summarizes the results of the review of the project. Because the comment does not raise any issues regarding the sufficiency of the EIR in identifying and analyzing impacts or avoidance and mitigation measures, no further response is required, per CEQA Guidelines Section 15204.
Consultation letter 1	

LETTER

U. S. Fish and Wildlife Service Carlsbad Fish and Wildlife Office 2177 Salk Avenue, Suite 250 Carlsbad, California 92008 760-431-9440 FAX 760-431-9624

In Reply Refer To: FWS/CDFG-12B0364-16CPA0031

California Department of Fish and Wildlife South Coast Region 3883 Ruffin Road San Diego, California 92123 (858) 467-4201 FAX (858) 467-4299

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Letter D

Mr. Jeffrey Szymanski Environmental Planner City of San Diego Development Services Center 1222 First Avenue, MS 501 San Diego, California 92101

Subject: Comments on the Recirculated Draft Environmental Impact Report for the El Camino Real Bridge/Road Widening Project, City of San Diego, San Diego County, California (Project No. 2982: SCH #1999071104)

Dear Mr. Szvmanski:

The U.S. Fish and Wildlife Service (Service) and California Department of Fish and Wildlife (Department), collectively referred to as the Wildlife Agencies, have reviewed the above-referenced Recirculated Draft Environmental Impact Report (RDEIR) for the El Camino Real Road Widening/Bridge Replacement Project, dated September 25, 2015. The public review period for this RDEIR ends on November 9, 2015. The Wildlife Agencies appreciate the time extension until November 20, 2015, granted by the City of San Diego (City) for providing comments to the RDEIR. The comments provided herein are based on the information provided in the RDEIR, the Wildlife Agencies' knowledge of sensitive and declining vegetative communities, and our participation in regional conservation planning efforts.

The primary concern and mandate of the Service is the protection of public fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and threatened and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Federal Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 et seq.), including habitat conservation plans (HCP) developed under section 10(a)(1) of the Act. The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA; §§ 15386 and 15381, respectively) and is responsible for ensuring appropriate conservation of the State's biological resources, including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act (Fish and Game Code § 2050 et sea.) and other sections of the Fish and Game Code. The Department also administers the Natural Community Conservation Planning (NCCP) program, a California regional habitat conservation planning program. The City participates in the Department's NCCP and the Service's HCP programs by implementing its approved Multiple Species Conservation Program (MSCP) Subarea Plan (SAP).

We previously commented on the Notice of Preparation (NOP) of a draft Environmental Impact Report (DEIR)/Environmental Assessment and DEIR for the project in our letters dated December 12, 2002, and October 23, 2006, respectively. From April 10, 2002, through September 26, 2012, we attended meetings and



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This letter includes introductory comments indicating review was conducted. This letter also includes a summary of Public review period and relevant meetings and the role of the agencies followed by a summary of the project purpose, location, preferred alternative, and project components. This letter provides a summary of biological regulations and conditions, impacts, and mitigation requirements - including proposed measures to protect biological resources. The letter concludes by indicating comments are attached. Responses to individual comments are provided below. Their understanding of the project is consistent with information presented throughout the Draft EIR. Because the comment does not raise any issues regarding the sufficiency of the EIR in identifying and analyzing impacts or avoidance and mitigation measures, no further response is required, per CEQA Guidelines Section 15204.

Mr. Jeffrey Szymanski (FWS/CDFG-12B0364-16CPA0031)

provided email comments on the proposed project. We appreciate the City's efforts to address major issues related to the potential biological impacts so that the RDEIR includes avoidance and mitigation measures that satisfy the requirements and recommendations of the Wildlife Agencies and other resource agencies [e.g., California Coastal Commission (CCC), Regional Water Quality Control Board (RWQCB), U.S. Army Corps of Engineers (Corps)]. The RDEIR acknowledges that there are several outstanding issues that remain to be resolved through further coordination and consultation with the agencies. From our perspective, the primary outstanding issue is the potential negative impact of the project on the Federal and State endangered lightfooted Ridgway's rail [Rallus obsoletus levipes (R. longirostris L); Ridgeway's rail], formerly known as the light-footed clapper rail, which is also a State Fully Protected Species.

The proposed project would: 1) raise and widen a 0.45-mile segment of El Camino Real roadway, and replace the bridge over the San Dieguito River to improve structural integrity, 2) alleviate problems associated with high flood events, 3) improve pedestrian and vehicular access to nearby coastal and recreational resources, 4) relieve traffic congestion, and 4) improve consistency with the adopted land use plan in the project area. An approximately 0.23-mile segment of Via de la Valle would also be widened (varying from 60 to 104 feet in width depending on the chosen design alternative) between the intersections of El Camino Real and El Camino Real North. Construction would last approximately 2.5 to 3.5 years, depending on the alternative.

The western portion of the project site is within the Subarea II of the North City Future Urbanizing Area, and the eastern portion is in the Fairbanks Ranch Country Club Community Planning Area. Portions of the project lie within the City's Local Coastal Program land use plan as well as areas under the California Coastal Commission's coastal development permit jurisdiction. The proposed mitigation lands and the southern end of the proposed project at San Dieguito Road are within the Multiple Habitat Preservation Area (MHPA) of the City's SAP. El Camino Real is upstream from the completed San Dieguito Lagoon wetlands restoration project and the planned San Dieguito Lagoon W19 Restoration Project.

Due to the federal funding component associated with the project (i.e., Federal Highway Administration under the Highway Bridge Replacement and Rehabilitation Program), the RDER includes seven alternatives analyzed at an equal level of detail in order to facilitate separate environmental review obligations per the National Environmental Policy Act. According to the RDER, the Eastern Alignment Alternative (EAA) is the preferred and environmental superior alternative. The EAA would construct a new bridge over the San Dieguito River on a diagonal alignment such that the west edge of the new bridge would be approximately 50 feet east of the existing bridge at the south end, and approximately 90 feet east of the existing bridge at the north end. The new bridge would be 354 feet long and 76 feet wide with six bridge piers (two sets of three along the length of the bridge) and two abutments, whereas the existing bridge is 340 feet long and 27 feet wide with eight piers. The new bridge would either be east in place or a prestressed concrete box girder type. It will include pedestrian walkways, bike lanes in the road, and a trail cantilever structure attached to the west side of the bridge. For this alternative (and well as all other design alternatives), the bridge and roadway would be raised above the 100-vear flood level.

All of the alternatives include construction of a new bridge and demolition of the existing bridge over the San Dieguito River, as well as excavating the river banks under the new bridge to have a steeper slope (i.e., 1.5:1 side slopes) than currently exists. The steeper bank slopes would be protected from erosion by rip rap that would be toed into the river bed. The steep slopes and bridge shading would prevent successful planting under the bridge. The existing rip rap under the river bed that currently protects the sever pipeline would be replaced if it were disturbed by construction. As mitigation for higher 100-year velocities with the project, the

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Mr. Jeffrey Szymanski (FWS/CDFG-12B0364-16CPA0031)	
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unprotected north bank of the San Dieguito River upstream of the bridge would also be protected with buried rip rap that would extend 500 feet east of the new bridge.

With the exception of the Lower Elevation Alternative, a JPA multi-use trail crossing under the north bridge abutment would be provided. The trail platform would be set at the 10-year flood level (approximately 13 feet above mean sea level). The undercrossing would be paved, and would be approximately 12 feet wide. It would connect to the existing public trail along the north bank of the river cast of El Camino Real. As a result of the undercrossing, the new bridge would have a height that is 6 feet higher than the existing bridge.

In addition to the Ridgway's rail, sensitive wildlife species within the project's area of potential effect include least Bell's virco (*Vireo bellii pusillus*, a Federal and State endangered species; virco), white-tailed kite (*Elanus leucurus*, a State Fully Protected Species), and the following State Species of Special Concern: yellow warbler (*Dendroica petechia*), Clark's marsh wren (*Cistothorus palustris clarkae*), yellow-breasted chat (*leteria virens*), and northern harrier (*Circus cyaneus*). Of these species, yellow warbler, Clark's marsh wren, and the Ridgway's rail is an MSCP-covered species, the Federal MSCP permit does not authorize harm or lethal take for the species. And, since the Ridgway's rail is a State Fully Protected Species, take authorization of individuals from the State is not feasible. In addition, incidental take of covered species due to mortality or habitat loss within Corps jurisdictional wetlands is not authorized by Federal MSCP permit. Incidental take authorization for projects that affect such jurisdictional wetlands shall be authorized through separate Act section for projects that affect such jurisdictional wetlands shall be authorized to Corps jurisdictional wetland such associated or dependent species outside of Corps jurisdictional wetlands will be in accordance with the MSCP and the City's SAP.

Vegetation communities identified in the project's Biological Study Area (BSA) include Diegan coastal sage scrub, mulefat scrub, southern willow scrub, coastal freshwater marsh, alkali marsh, and salt marsh. Open water also occurs in the San Dieguito River. The sensitive plant species that would be impacted include Palmer's sagewort (*Artemisia palmeri*), San Diego sunflower (*Bahiopsis laciniata*), San Diego marsh-elder (*Iva hayesiana*) and Southwestern spiny rush (*Juncus acutus sp. leopoldii*).

All of the alternatives would impact southern willow scrub, mulefat scrub, coastal freshwater marsh, disturbed southern coastal salt marsh, and Diegan coastal sage scrub (Page 3.12-21). The proposed mitigation for the alternatives would restore a total of 20.4 acres of habitat on a 66.8-acre property owned by the JPA (formerly the Boudreau property, with alternatives using between 14.37 acres and 20.4 acres of the restoration to offset project impacts). The restoration effort includes approximately 15.4 acres of coastal freshwater marsh, 2.0 acres of mulefat scrub/southern willow scrub enhancement, and 3.0 acres of mulefat scrub/southern willow scrub enhancement, and 3.0 acres of mulefat scrub/southern willow scrub enhancement, and 3.0 acres of mulefat between the scrub/southern willow scrub restorative would require an additional 6.48 acres of wetland mitigation mitigation which would occur on a City-owned property in Gonzales Canyon immediately south of the JPA property.

Impacts to the City's MHPA range from less than 0.2 acre to approximately 1 acre, and impacts to sensitive upland habitats range from 14.77 to 15.25 acres. Mitigation per the City's SAP habitat tiers and mitigation ratios for these impacts would occur through purchase of credits from the City's Cornerstone Lands Mitigation Bank at Marron Valley.

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LETTER

Mr. Jeffrey Szymanski (FWS/CDFG-12B0364-16CPA0031) 4
Among the other biological mitigation measures included in the RDEIR are the following, most of which pertain to project construction:
 Regardless of the alternative built, no construction would occur within the River corridor during the breeding season of the Ridgway rail and vireo (February 1 to September 30).
Noise from construction activities outside of the river corridor will not exceed 60 dBA (hourly) at the river corridor during the breeding seasons of the Ridgway rail and the vireo.
Outside of the breeding season, construction in the river corridor will be limited to daylight hours. No temporary lighting will be installed for construction at night.
 Staging and equipment storage areas and equipment maintenance will be located outside of the river corridor and all potential habitat areas.
Construction lighting in upland areas will be the lowest illumination necessary, and directed away, or shielded from the river corridor.
A qualified biologist will train the construction crews and field workers to avoid unnecessary impacts to biological resources by briefing them on resource protection measures.
 Prior to the start of construction, the project biologist will supervise the installation of orange construction fencing or equivalent along the limits of disturbance within and surrounding sensitive habitats as shown on the approved plans. Temporary fencing will be removed after project completion.
 After completion of construction, permanent low-sodium lighting would be installed along the El Camino Real Bridge, and directed away from the MHPA and areas that might be used for wildlife movement.
We offer our recommendations and comments in the Enclosure to assist the City in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources, and to ensure that the project is consistent with all applicable requirements of its SAP. If you have questions or comments regarding the contents of this letter, please contact Sally Brown of the Service at 760 431-9440, extension 278, or Tim Dillingham 858 467-4250, or Paul Schlitt of the Department at 858 637-5510.
Sincerely,
David goutens for Grand
Karen A. Goebel Gail K. Sevrens

LETTER

RESPONSE

Mr. Jeffrey Szymanski (FWS/CDFG-12B0364-16CPA0031) 5	
00:	
Gabriel Buhr, California Coastal Commission, San Diego, CA 92108	
Stephanie Hall, U.S. Army Corps of Engineers, Los Angeles, CA 90017	
Connell Dunning, U.S. Environmental Protection Agency, San Francisco, CA 94105	
Stephanie Hall, U.S. Army Corps of Engineers, Los Angeles, CA 90017 Connell Dunning, U.S. Environmental Protection Agency, San Francisco, CA 94105 Elizabeth White, U.S. Environmental Protection Agency, San Francisco, CA 94105	
Elizabeth White, U.S. Environmental Protection Agency, San Francisco, CA 94105	
Michael Porter, Regional Water Quality Control Board, San Diego, CA 92124	
Robert James, California Department of Transportation, San Diego, CA 92110	

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TAKE PRIDE will try to fly over the bridge rather than walk under the bridge to habitat downstream.	Description Description Description Description	 D-2 Section 1.5.2 of the Final EIR has been revised to remove the reference to the clapper rail (Ridgway's rail). The Ridgway's rail is a federal and state listed endangered species and a state fully protected species. Federal take authorization will require review by the USFWS under Section 7 of the Endangered Species Act as part of the 404 permit process. It is expected that interagency coordination between USFWS and CDFW will occur during the Section 7 consultation process to address overlapping resource protections. The USFWS is anticipated to issue a Biological Opinion that addresses any federal authorized take of the species. The conclusion in the EIR that impacts to Ridgway's rail will be less than significant with appropriate mitigation shall be supported in the Biological Opinion. These mitigation measures would provide the assurance to CDFW that take would not occur. D-3 This suggestion is acknowledged and is now part of the public record. Although not yet designed, the Draft EIR evaluates the environmental impacts of including an 8-foot-wide cantilever structure attached to the west side of the bridge as a multi-use trail to accommodate equestrian users of the regional trails as well as pedestrians and bicyclists. The cantilever provides a separation between trail users and automobiles. In addition, an 8-foot-high fence is required for safety purposes along the western side of the cantilever. The Draft EIR determined this additional fencing would block the westward view of Sam Dieguito River; however, the fence cannot be lowered such that all viewers could see over it and there is no design identified at this time that would assure the view blockage would be avoided. This impact was determined to be significant and unmitigable. The suggestion for fencing on both sides of the bridge would intensify this visual impact and therefore will not be incorporated into the project. Therefore, fencing also added to the east side of the bridge would be problematic for views of drivers,
	¹ Soulé, M.E. 1991. Theory and strategy. Pages 91-104 in W.E. Hudson, ed. Landscape linkages and biodiversity. Island Press, Washington.	the ground. The deck of the bridge is anticipated to be approximately 60 feet above the adjacent marsh habitat. It is therefore unlikely that Ridgway's rails will try to fly over the bridge rather than walk under the bridge to habitat

D-3 (cont.)

In summary, addition of fencing to the east side of the bridge would result in visual impacts not identified in the Draft EIR. Figure 3.3-11: Visual Simulation #8 of the Draft EIR applies to the fencing proposed on the west side of the new bridge for any alternative. Page 3.3-17 of the Draft EIR summarizes the potential contrast from this fence as follows: "Contrast Summary: The equestrian fence as proposed is considered to have an impact on a public viewing corridor since it interrupts the view of the San Dieguito River from the perspective of drivers, walkers, and cyclists using the bridge. The views are considered to be sub-regionally important and have been identified in the NCFUA as important view resources found in the valley. Since the viewers who would see this view are located mostly on the southbound side of the bridge, they would be moving as they see this view."

See also response #7 below which acknowledges the preference of the Wildlife D-4 Agencies for the trestle option. Section 3.12.2.5 of the Draft EIR indicates that the San Dieguito River functions as a wildlife corridor for federally and state endangered species, including light-footed clapper rail and least Bell's vireo. There could be species with a wide range of motion throughout the river corridor (i.e., coyote) and species which may nest within more specific areas of the river corridor (i.e., Ridgway's rails). The focus of the analysis in the NES and Draft EIR is on listed species. In addition, the following terrestrial wildlife species are likely to use the corridor: coyote, striped skunk, Virginia opossum and raccoon. These species may be more likely to utilize the openings in the berm during periods of active construction within the river (daytime hours during the non-breeding season) but would be more likely to use them during nighttime. In addition, during periods where construction is prohibited in the river (during the breeding season) orange construction fencing could be removed thereby allowing terrestrial species, including the Ridgway's rails, among other species, to move during both daytime and nighttime over the berm as well as through the openings. The installation of piles for the trestle is/not generally considered to be an obstacle for terrestrial wildlife. Terrestrial wildlife would be able to move between the rows of piles, especially at night. The size of the openings in the berm is based on the dimensions of available steel plates strong enough to support construction machinery while allowing the widest possible opening in the berm. The biological foundation for the openings is based on a meeting held with Dick Zembal, an expert on Ridgway's rails. During that meeting Mr. Zembal stated that the rails may use the openings to move back and forth beneath the bridge. Based on that assertion, it was decided that multiple openings would provide more avenues for local wildlife migration

D-4 (cont.)

than a single opening. In addition, the San Dieguito River would function as a wildlife corridor without interruption during the breeding season and in the night during construction in the non-breeding season. Thus, the function of the wildlife corridor is not compromised for the entire 2.5–3 year construction period.

Because this corridor is used by a wide variety of species, the project requires maintenance of a wildlife corridor and monitoring to verify wildlife is not entrapped during construction activities. Mitigation Measure Bio-11 I E reads: "Orange construction fencing will be installed along the banks of the low flow channel to discourage wildlife from accessing the construction areas approved in the plans. The trestle option would provide for a wildlife corridor that maintains the current geometry of the river corridor with the exception of the rows of driven piles that would function similarly to the existing bridge support columns (with approximately twice as many series of piles compared to the pier walls), i.e., would result in a series of passageways across the river." An alternative method that may facilitate movement during construction in the river could include removal of the orange fence each night and reinstallation at the beginning of each work day. This would require that a qualified biologist inspect each opening each day to ensure that no rails or other wildlife are trapped in the openings as part of the compliance with mitigation measure Bio-11. If the resource agencies concur, the project can be modified to accommodate this condition. Given that the agencies have expressed the desire to use the trestle option, such a condition may be considered moot. With the proposed design considerations and mitigation, Section 3.12.2.8 of the Draft EIR concludes that impacts would be less than significant with mitigation.

D-5 Section 3.12.3.8 of the EIR concludes that the San Dieguito River would function as a wildlife corridor without interruption during the breeding season. In addition, mitigation measure Bio-11 I D in Section 3.12.5.3 of the Draft EIR provides monitoring during construction to check that wildlife is not entrapped, verify that the boundary fencing is maintained in good condition, and ensure that construction activities do not encroach into biologically sensitive areas.

It was determined that this mitigation measure, along with the others specified in Section 3.12.5.3, would adequately reduce potential impacts to wildlife movement to less than significant. Therefore, the use of photo cameras would not be necessary. However, the City will continue to work with agencies through permitting to determine appropriate permit conditions.

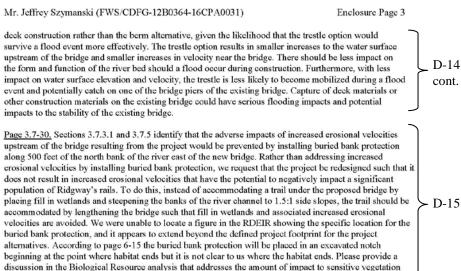
D-6 The preference of the Wildlife Agencies for the trestle option is acknowledged and is now part of the public record.

Mr. Jeffrey Szymanski (FWS/CDFG-12B0364-16CPA0031) Enclosure Page 2 Page 2-25, Because of the multiple resource agencies involved with this project, we recommend that Section 2.4 state that the City will use the information in the RDER to solicit input from all the resource agencies, in addition to the Wildlife Agencies, on wetland avoidance prior to the public hearing for the project. D-7 Page 3.1-36, Section 3.1.3.4, Issue 2, While habitat loss is proposed to be mitigated, we recommend provision of detail on how wildlife movement through the area has been addresses conformance for all issues defined under Section 1.4.2 of the City's SAP (e.g., flood control or trail location). According to information in the NES, Impacts associated with trait construction and any mitigation for those impacts are the responsibility of the JPA and are not included in the NES. Please address these issues under this finding, including redirecting the trait to upland habitat. D-9 Page 3.1-42, DW With regard to the project conformance with relevant ESL. Regulations provided in Table 3.1-7, please clarify the conformance determination provided under Section 143.0150 of the ESL regulations. Regardless of the area not being officially designated as a floodway per FEMA mapping standards, portions of the project are located within what is called in the document Zone A. In addition, according to the RDEIR (page 3.1.24) the project footprint is located in a Special Flood Hazard Area (the 100-year floodplain of the San Dieguito River). D-10 Page 3.1-64, Section 3.1.3.9 identifies that the City's SAP includes one specific MIPA guideline that directly addresses improvements to EI Canino Real. However, MIPA Quideline Map Note C17 should also have been included. Please provide further discussion on compliance with Map No	 D-7 Edits have been made as requested. Section 2.4 (Final EIR, page 2-25) of the Final EIR now states: "The City will use information in this document to verify that input on wetland impact avoidance has been solicited from the USFWS and CDFW, in addition to other agencies, in accordance with SDMC Section 143.0141(b)." The California Coastal Commission provided a comment letter during public review. In addition, all permitting agencies will receive notice of public hearings for this project. D-8 See responses to #4 and #5 above. For post construction, wildlife movement for terrestrial wildlife and is expected to be similar to existing conditions with the bridge species for terrestrial species moving through the corridor and nesting species in specific areas of the river corridor. In addition, the mitigation noted in the comment is anticipated to provide additional and higher habitat value. The JPA Mitigation Area has been designed to allow for species movement. The river corridor is maintained with the design of the JPA mitigation site. With no obstruction of the river corridors is anticipated. D-9 This project would accommodate the construction of a planned trail. As stated in Table 3.1-6 of the Draft EIR, which addresses consistency with local plans, the build alternatives would not interfere with existing or planned trails; however the proposed public access trail itself or where it is specifically located is not proposed as a part of this project. Other projects would be required to obtain permits from the applicable agencies. Similar to the proposed project, any future trails would be required to avoid and minimize impacts to MHPA and wetland resources to the extent feasible. It is not clear what trail on page 3.1-42 of the Draft EIR is being referenced in this comment. If the comment is referring to JPA trail Segments 11 and 12 discussed on page 3.1-38 of the Draft EIR, please see JPA comment #12, which notes: "8. The DEIR does not correctly describ the current conditio
(February 1 to September 30), while Figures 2-24 through 2-29 define the nesting season as February 16 D-12 to September 15. Please correct the nesting season in Figures 2-24 through 2-29 to February 1 to September 30. Page 3.1-74. Section 3.1.5 (Mitigation Measure) should have specific measures to address each of the MSCP Land Use Adjacency Guidelines, as opposed to only the language from section 1.4.3 of the City's SAP. For example, as discussed elsewhere in the RDEIR, "drainage from the widened roadway would be routed to bio swales, hydrodynamic separators, or other appropriate permanent best management practices constructed between the widened roadway and the existing or restored open ditch, and these facilities would serve to treat runoff prior to the runoff entering the San Dieguito River." Page 3.7-1. Section 3.7 (Hydrology/Water Quality). In order to determine whether the updated hydrologic and hydraulic studies sufficiently addressed the concerns expressed in our 2006 letter, the Department's	 permits from the applicable agencies. Similar to the proposed project, any future trails would be required to avoid and minimize impacts to MHPA and wetland resources to the extent feasible. It is not clear what trail on page 3.1-42 of the Draft EIR is being referenced in this comment. If the comment is referring to JPA trail Segments 11 and 12 discussed on page 3.1-38 of the Draft EIR, please see JPA comment #12, which notes: "8. The DEIR does not correctly describe the current condition of the Coast to Crest Trail in the project area. The DEIR does not identify the fact that the Coast to Crest Trail Horse Park segment currently exists and dead ends at El Camino Real. Page 3.1-4 under "Project Site Land Uses" should include that trail segment. The statement in Section 3.3.2.6 (end of first paragraph) needs to be updated to reflect the fact that the CTC Trail now exists along the entire southern edge of Horse Park to El Camino Real." These corrections have been made in the Final EIR. The only public trail segments incorporated into this project are the undercrossing that will be set under the north bridge abutment,
	project are the undercrossing that will be set under the north bridge abutment, and the cantilever trail that would be built by others on the west side of the bridge. Neither of these segments can be redirected to upland habitat.

- D-10 The analysis performed for the project and documented in the hydraulic reports for the project in Volume 3 of the Draft EIR indicate that there would be no rise in the floodplain levels as a result of the project. Specifically, the discussion in the Draft EIR Section 3.1.3.5, Issue 3: Conflicts with Environmentally Sensitive Lands Regulations of the Land Development Code, explains that "The portion of the San Dieguito River in the project area does not have detailed FEMA floodplain mapping so does not have a designated floodway. Hydraulic modeling for the El Camino Real Bridge/Road Widening Project has demonstrated the project would not increase 100-year flood levels above the water surface elevations predicted under current conditions" (see page 3.1-45). Conformance of the project with floodplain plans, policies, and regulations is considered to be adequately addressed in the Draft EIR.
- D-11 Within the MSCP, Note C17 on the Future Urbanizing Area reads: "If this area develops or redevelops, the MHPA boundary should be accommodated with the majority of the floodplain to be placed in open space and restored where possible to natural habitats." C17 is placed across Gonzales Canyon, which is south and east of the proposed project area and also within the MHPA. As this area is now part of an off-site mitigation requirement to be restored and enhanced to a higher habitat function for projected additional mitigation impacts related to the Fairbanks Ranch Mitigation Site, the proposed project does provide restoration to natural habitats within the MHPA. Therefore, a discussion has been added to the end of Section 3.1.3.9, on page 3.1-74 of the Final EIR, which states: "Consistent with MSCP and Biology Guidelines, project areas, the JPA Mitigation Site, and the additional off-site mitigation area are considered open space and MHPA are proposed to be restored where possible to natural habitats."
- D-12 Figures 2-24 through 2-29 have been revised as requested in the Final EIR.

LETTER

- The introduction to Section 3.1.5 of the Final EIR has been revised to clarify, D-13 "To preclude indirect impacts to the adjacent MHPA, the project would incorporate mitigation measures consistent with the City's MHPA Land Use Adjacency Guidelines. Therefore, the following specific measures are required by the City for projects located within and/or adjacent to the MHPA. These measures are to be used in addition to Biological Resource Protection During Construction MMRP and with the direct habitat impact and species specific mitigation requirements specified in Section 3.12 of this recirculated EIR." These mitigation measures are consistent with those being required for all projects adjacent to the MHPA. Specific measures that are being implemented to address each MHPA LUAG are presented in Section 5.14 of the Draft Natural Environmental Study which is found in Volume 2 of the FEIR Appendices. For example, to address the LUAG for Barriers (i.e., New development adjacent to the MHPA may be required to provide barriers (e.g. noninvasive vegetation, rocks/boulders, fences, walls, and/or signage) along the MHPA boundaries to direct public access to appropriate locations and reduce domestic animal predation) the mitigation measure states; "Barriers, such as white, wood-faced fencing would be provided along the newly constructed road and bridge to direct the public and associated domestic animals away from the MHPA." Each LUAG is addressed in a similar manner. Therefore, no further measures are needed in Section 3.1 of the EIR.
- D-14 The preference of the Wildlife Agencies for the trestle option is acknowledged and is now part of the public record. See response to #6 above.



communities, sensitive wildlife species, and restoration being proposed to address these direct impacts. In addition, the location of the proposed bank stabilization activities (e.g., Mitigation Measure Hyd-1) should be evaluated in the context of the outstanding wetland mitigation obligations associated with the Rancho

Santa Fe Polo Club. Prior unauthorized grading activities occurred along the south side of the polo field (within riparian habitat areas along the San Dieguito River) which resulted in the City initiating a codes enforcement action against the lessee and requiring commensurate wetland restoration. There should be a clear delineation of areas obligated to address prior grading violation versus the area associated with the 500-foot bank protection.

Page 3.7-17. The analysis examining Conditions During Construction (3.7 Hydrology/Water Quality) cites a hydraulic study entitled Hydrologic and Hydraulic Report for the El Camino Real Road/Bridge Widening Project on the San Dieguito River (Construction Phase) (Rick Engineering Company, dated May 13, 2013). Also, Section 3.12.3.6 eites the May 2013 study of river hydraulics as being the most recent study. However, we were unable to locate a copy of this report in the RDEIR's technical appendices. Please include a copy of this report in the technical appendices of the final REIR.

Page 3.12-1. Section 3.12 (Biological Resources) states the NES is intended to support the RDEIR and meet the City's requirements pursuant to the Land Development Code, Biology Guidelines. According to Table 3 in the City's Biology Guidelines, uplands should be categorized into one of the four tier categories (I-IV). If areas are identified as wetlands, habitats should be categorized according to Table 2 of the Biology Guidelines. Additionally, the mitigation ratios (per City's Biology Guidelines), where applicable, should be identified for project impacts/mitigation tables (irrespective of the mitigation agreement cited in the NES). The final REIR should include the corresponding impact tables identifying the effected tier upland habitats and wetland habitats as this information is a necessary part of the City's Annual SAP reporting obligations.

As demonstrated in the hydraulic studies, for low-flow conditions in the river D-15 channel (up to approximately the 10-year storm event), the hydraulic conditions within the river will remain essentially the same in the post-project condition as in existing conditions. This is evident by comparing the WSELs and velocities within the channel for the 10-year storm event, where minimal differences have been demonstrated. The primary reason for this is that the toe and top of the existing riverbanks at the bridge and upstream and tops of the existing riverbanks in the vicinity of the project are roughly the same as the 10-year WSELs. During larger events the birds would not be able to remain in the channel in either existing or proposed conditions. The buried bank protection is proposed along the north bank to retrofit the existing channel bank to withstand erosional velocities. Its limits were determined based on locations where there is an increase to velocities and where they exceed 6 feet per second (fps), which is occurring during the larger storm events that exceed the channel capacity (i.e. - greater than 10-year storm events). A description of the installation is provided in Section 3.7.5, Hyd-1 of the Draft EIR.

As described in Section 3.7.5 of the Draft EIR, buried bank protection along the northern bank of the river would avoid impacts to wetlands in the river. The proposed bank stabilization activities described in Mitigation Measure Hyd-1 would be required along a portion of the bank and extending to the top of slope. A portion of the 500-feet protection area is within the footprint of the bridge project on the northern bank. The bank protection activities would extend out along the disturbed area for a distance of approximately 350 feet. This work is anticipated to occur along the southerly edge of the existing trail within primarily disturbed areas. Section 3.7.5 of the Draft EIR states: "The construction zone would be from the trail edge on top down to the environmental habitat limit lower on the slope. Because this area is disturbed and the bank protection activities are proposed outside of sensitive vegetation, impacts to biological resources are not anticipated.

The bank protection, if installed as part of mitigation measure Hyd-1, is proposed to be installed behind (north of) vegetation associated with the lowflow portion of the river and around existing trees along the path. The work is proposed to occur outside waters jurisdictional to ACOE and RWQCB. Hyd-1 includes measures to avoid substantially altering any riparian or sensitive vegetation that would be considered jurisdictional to CDFW. The bank protection, if installed as part of mitigation measure Hyd-1, is proposed to be installed behind (north of) vegetation associated with the river and around existing trees along the path. Mitigation Measures Hyd-1 states in the Draft EIR that "a temporary construction fence/environmental fence at the point of the slope where the habitat line ends" would be required. This same process and

D-16

D-17

D-15 ((cont.) similar protective silt fencing is shown during work on the south bank in Figure 3.7-5 of the Draft EIR.
	The slope would be refilled and re-contoured and revegetated with native plant materials as directed by the permitting agencies." Further, all construction activities are required to implement mitigation measures protection biological resources. This includes monitoring (e.g., His-1, Pal-1, and Bio-14 in Section 6.0, Mitigation Monitoring and Reporting Program) as well as working outside the breeding season (e.g., Bio-9).
	Regarding lengthening the bridge, this has also been considered and rejected since the proposed length adequately conveys the 100-year design storm event without any increase to Water Surface Elevations. By adjusting the existing 2:1 side slope to 1:5 under the bridge, the toe is pulled back from the channel as cut, not as fill. The river channel widening is discussed as an alternative considered but rejected in Section 5.1.4 of the Draft EIR. This discussion explains that during preliminary design the "Wider Channel Alternative" was developed to avoid predicted increases in upstream 100-year water surface elevations caused by raising El Camino Real on embankment across the floodplain. See also response to Coastal Commission #10 for additional detail pertaining to the discussion of a project alternative to lengthen the bridge.
D-16	Any areas disturbed would be enhanced or restored to their original condition. The obligations of a separate project or unauthorized activity (i.e., code violations) are outside the scope of the proposed project and would be addressed to specific leaseholders. See also response to #15 above.
D-17	The Hydrologic and Hydraulic Report for El Camino Real Road/Bridge Widening Project on the San Dieguito River (Construction Phase), dated May 13, 2013 is a more detailed hydraulic report for the issue of temporary impacts explained in the Bridge Construction Methodology & Associated Noise Reduction Measures, and Biological & Hydraulic Impacts (2013) referenced in Sections 3.7 and 3.12 and included as Appendix D to the Draft EIR.
	The more detailed <i>Hydrologic and Hydraulic Report for El Camino Real</i> <i>Road/Bridge Widening Project on the San Dieguito River (Construction Phase)</i> has been added to Volume III as requested. This report is now listed in the Table of Contents for the Final EIR.
	Section 3.7.2.2, Conditions During Construction, in the Final EIR has also been revised and now reads as follows: "Characteristics of the berm and trestle options are summarized in Appendix D and discussed in more detail in the

D-18	construction phase hydraulic (Rick 2013)." Finally, Section 3.12.3.6 of t "Several studies have been cor- area, most recently in a May construction prepared by Rick the EIR and summarized in Ap Section 3.12.2.2 of the Draft H communities present within th according to the City of San have a substantial adverse imp IIIA Habitats, or Tier IIIB H Section 3.12.4.2 of the Draft E or Tier IIIB Habitats in the involve direct impacts to di throughout the Draft EIR and coastal sage scrub will be pro- from the City's Cornerstone L appendix in Volume II of the Diego Biology Guidelines Co states: "In order to attain City ESL regulations found in the Code, as well as the MSCP S Biology Guidelines, as conta Review References, were con "substantially complete" by includes Table 5 which outline	study contained within Volume III he Final EIR has also been revised ducted of the hydraulics of the river in y 2013 study of river hydraulics du Engineering which is included in Vo- pendix D." EIR provides a summary of the uplance e project area and indicates the corresp Diego. In response to whether the pro- pact on any Tier I Habitats, Tier II Ha- labitats as identified in the Biology IR indicates that "There are no Tier I project area. Impacts to Tier II Habi- sturbed Diegan coastal sage scrub." NES, mitigation for impacts to distur- ovided at a 1:1 ratio through purchas ands. The NES, which is included as e Draft EIR, includes Appendix H: Consistency Summary. Section 1.1 of approval, the project must conform to e Biology Guidelines of the Land D ubarea Plan. The 2002 Land Develop ined within the City of San Diego nsidered appropriate as the project v the City on April 25, 2002." This es applicable City of San Diego mitig- nunities found in the Project Area. T	and reads: the project ring bridge dume III of l vegetation ponding tier opject would abitats, Tier Guidelines, or Tier IIIA itats would As stated bed Diegan e of credits a technical City of San this report o the City's evelopment ment Code, Biological vas deemed report also ation ratios
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Vege	etation Types found in the	Habitat Types Defined by the City of San Diego	Ratio
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Mr. Jeffrey Szymanski (FWS/CDFG-12B0364-16CPA0031) Enclosure Page 4	
Page 3.12-2. Special Project Areas. The discussion states, "A small portion of the proposed mitigation site for the constructed Fairbanks Ranch Project occurs within the BSA. However, because this project's mitigation effort was never implemented, impacts to these areas are not assessed as impacts to a mitigation site." Further, the area mapped as mitigation in Figures 3.12-2b through-2e is limited to the area which appears to depict the abutments for the EAA while the mitigation site includes the entire river channel. This outstanding mitigation obligation has not been resolved. Therefore, the mitigation site should be accurately mapped and impacts to this area should be assessed as impacts to a mitigation site.	D-19
Map 3.12-2b through 3.12-2c. It is not clear why the Western and Central Alignment Alternatives have a much wider footprint than the EAA. Please provide an explanation in the text describing the alternatives.	D-20
Page 3.12-2. JPA Mitigation Site. The discussion pertaining to the JPA mitigation site does not identify the parties responsible and funding mechanism/amount for the long-term management, or the mechanism for long-term protection (e.g., covenant of easement, a conservation easement, granting fee title), of the site. All of these should be identified in the final REIR.	D-21
Page 3.12-29. The discussion provided in Section 3.12.3.4 cites that the removal of the transmission line and the buried utilities beneath the line are infeasible. The discussion further mentions that numerous perch locations are available along a mile stretch of the river from El Camino Real upstream to Morgan Run Golf Course and concluding that sufficient cover will be available at the mitigation site to provide refuge from aerial predators. However, the conceptual mitigation plan (RECON Environmental, Inc., dated April 20, 2015) acknowledges that it may take 15 years or more for some of the vegetation communities and individual species, particularly within the riparian sorub area, to reach full maturity and habitat value. We believe lessening the impacts of the utility corridor must still be considered if high value and naturally functioning wetlands in this area are to be restored. This includes recognizing artificial perch areas for raptors in proximity of the restoration site and the likelihood for increased predation on Ridgway's rail chicks in the interim of achieving sufficient natural cover. Zembal <i>et al.</i> (2010) ² mentions that management strategies in support of the species have included the study and control of introduced predators and unnaturally high predator populations. Prior rail census results identified raptor predation as contributing to limiting rail survival at some survey locations in southern California, along with suggesting supplemental raptor monitoring. The conceptual mitigation plan includes an adaptive management discussion, which lends itself to include a monitoring program to assess these conditions. These are the types of measures we recommend that the City implement as area specific management directives for the species.	D-22
Page 3.12-36. Section 3.12.3.9 (Issue 3: Impacts to MHPA Areas) is limited to evaluating the potential impacts to MSCP Covered Species (i.e., Ridgway's rail, vireo, and northern harrier) during the construction phase of the project. The discussion should also include corresponding guidance for the additional obligations for conditions of coverage for each of these species as defined in the City's SAP (e.g. development of area specific management directives specific to effected species).	D-23
Page 3.12-52. The Upland Habitat Mitigation Measure (Section 3.12.5.1, Bio-2) should specify that mitigation will require concurrence from the Wildlife Agencies per conditions of the Cornerstone Banking Agreement.	D-24
2 Zembal, R., S.M. Hoffman, J.Konecny, L. Conrad, C. Gailband, and M. Mace. 2010. Light-footed Clapper Rail Management, Study, and Propagation in California, 2009. California Department of Fish Game, Wildlife Branch,	

Nongame Wildlife Program Report, 2010-07. Sacramento, CA 31pp.

D-19 Section 3.12 and Figure 3.12-2c of the Draft EIR display the proposed mitigation area for Fairbanks Ranch within the proposed road/bridge footprint. The Draft EIR and NES prepared for the project called out these areas as approximately 0.05 acre with 0.1 acre on the south bank of the river and 0.4 acre on the north bank of the river. The Draft EIR did not assess impacts to a mitigation site as it is not currently being implemented. In 2016, following public review of the Draft EIR, it was determined that wetland and riparian enhancement for the Fairbanks Ranch Project is proposed for implementation prior to the commencement of the proposed road and bridge improvements. The Fairbanks Ranch mitigation area will undergo invasive species removal for a stretch of the San Dieguito River. The portion of the Fairbanks Ranch mitigation area within the road/bridge footprint for the proposed project totals 1.7 acres. Therefore, projected mitigation requirements have been calculated in anticipation of the Fairbanks Ranch mitigation area implementation.

Table 1, in the Errata to the Final EIR, outlines the projected mitigation requirements for the Eastern Alignment Alternative, which is the City's Preferred Alternative and concluded to be the Environmentally Superior Alternative. As shown in Table 1, the project footprint has not changed, and the original total impacts of 42.1691 from the road and bridge improvements and JPA Mitigation Site have not changed. However, the projected mitigation requirements would increase to 4:1 for all areas within the 1.7 acres of the Fairbanks Ranch mitigation area. Table 1 shows that the original 42.1691 acres of total impacts requires 34.5246 acres of mitigation. This mitigation requirement increases by 2.406 acres to 36.9306 acres when impacts to Fairbanks Ranch mitigation area are projected to require a higher mitigation ratio.

A total acreage of 20.4 acres on the JPA Mitigation site is available as mitigation for wetland impacts due to the proposed project. The original mitigation requirement would provide an excess of 0.6858 acre (see Table 3.12-8c) would now be used to offset the 2.406 acres. The balance of 1.72 acres would be accomplished through off-site mitigation in an area of Gonzales Canyon described in the Draft EIR. This site is considered suitable for mitigation through a combination of creation and enhancement on up to 10.8 acres, including freshwater marsh, cismontane alkali marsh, and southern willow scrub enhancement (see Appendix K of the NES, Conceptual Restoration Plan). Impacts to upland communities would continue to be mitigated through the purchase of Cornerstone Lands.

D-19 (cont.)
References to this area have been revised in the Errata and within the Final EIR including:
• Table 1 has been added to the Final EIR to provide the projected mitigation requirements with Fairbanks Ranch Mitigation Site Considered.
• Table 5-1 has a note indicating the original acres of total wetland mitigation requirements from the proposed project would be increased if road and bridge impacts to the Fairbanks Ranch property are projected to be impacted as a mitigation site, in some cases also requiring additional offsite mitigation on a site owned by the City similar to the Roundabout Alternative.
• Mitigation Measure Bio-1 in Section 6.0, Mitigation Monitoring and Reporting Program, includes a discussion of the projected mitigation requirements with the Fairbanks Ranch Mitigation Area considered.
D-20 According to Table 2-1 of the Draft EIR, which summarizes the key characteristics of the build alternatives, the total road width (without slope easement) for the Western, Central, and Eastern alignments would all be 104 feet. Maps 3.12-2b through 3.12-2c reflect this distance. The perceived difference is due to a slight variation in the scale of the figures provided.
D-21 As indicated in the Executive Summary and Section 3.12.1.1 of the Draft EIR, mitigation for the JPA Mitigation Site is being conducted by SANDAG in association with the City of San Diego under a memorandum of agreement pending Council approval. Per this agreement SANDAG will design and implement the environmental restoration of the W-19 Restoration project site (to include the JPA mitigation site) and obtain all required approvals and permits from all applicable local, state and federal regulatory agencies. SANDAG further acknowledges that it will be responsible for the long-term monitoring and management of W-19 Restoration project site directly or through its proxies.

A primary goal of the proposed restoration on the JPA site is to improve the D-22 breeding and foraging habitat of the light-footed clapper rail. The Conceptual Mitigation Plan states: "Performance standards for assessing whether these goals have been met will include a habitat component and a species-specific component. The habitat for the light-footed clapper rail will be evaluated based on vegetation performance standards, a habitat assessment of the created marsh and restored riparian corridor, and focused surveys." After construction and restoration is done, more habitat will be available for rails and the project would improve conditions for this species compared to existing condition. Dick Zembal, who was referenced in this comment, was consulted to assist the City in determining the value of including a monitoring program as discussed in the comment. Based on that communication it was determine that monitoring would not provide utility and that resources would be better spent in different efforts. Furthermore, Ridgway's rails are not expected to use the habitat being restored at the mitigation site until sufficient vegetation cover has developed, making the site more suitable for use by the species. As the habitat at the mitigation site develops over time the habitat structure will improve to the point where rails may be attracted to the area as it will provide the cover they need to avoid aerial predation. Until the mitigation site habitat reaches this stage, it is doubtful that rails will use the area particularly given the enhanced opportunities for cover from aerial predators as a result of habitat enhancement proposed east of the bridge. In addition, other activities anticipated to occur in the vicinity of the mitigation site, such as the removal and control of tamarisk, will benefit the rail population by eliminating habitat that could harbor other important predators (e.g., raccoons). D-23 Section 3.12.3.9 of the Final EIR has been revised as requested. The discussion of general compliance now reads: "To summarize, the proposed project would conform to the land use guidelines and existing management plans provided in the City's Subarea Plan" In addition, designated Area Specific Management Directives (ASMDs) from the Subarea Plan for the MSCP covered species in the project area for Ridgway's rail, least Bell's vireo, and northern harrier have been incorporated as requested. This section of the EIR has been revised to include applicable ASMDs and how the project complies with each is discussed below and in the EIR as follows:

D-23 (cont.)

Ridgway's Rail

1) Measures to protect nesting sites from human disturbance during the reproductive season.

Compliance: Construction activities are anticipated to occur during the breeding season of the Ridgway's rail. Direct impacts to the rail would be avoided by implementing measures to restrict access to the construction area such as no clearing of habitat during the breeding season, through the use of temporary exclusionary fences, daily clearance surveys, and on-going monitoring of construction activities. Indirect impacts from sources such as noise and altered hydrology have the potential to affect resident rails in the vicinity of the project. Noise attenuation measures to reduce the effects of construction noise on the rail have been proposed, with additional measures to be developed in coordination with the resource agencies. Similarly, measures to reduce the effects of noise and vibration from pile driving have been considered. Temporary changes in the hydrology of the San Dieguito River in the vicinity of the project during construction would be addressed through the use of temporary berms or trestles, reducing the potential effects of altered hydrology on the rails and their habitat.

2) Measures to protect against detrimental edge effects.

Compliance: The JPA Mitigation Site includes permanent berms to protect the mitigation site from edge effects due to flood scour and human encroachment. The bridge itself will be well above the adjacent habitat areas, making it difficult for humans to access the habitats areas. Potential future equestrian trails will be located above and along the perimeter of habitat area to reduce the potential for encroachment. Once the bridge is complete, noise impacts would return to preconstruction levels and are not anticipated to effect the nearby rail population. As the new bridge replaces an existing bridge, the pre-construction condition already tolerated by the adjacent rail population is anticipated to be the same after the new bridge is complete.

Least Bell's Vireo

1) Measures to provide appropriate successional habitat and upland buffers for known populations.

Compliance: Suitable successional willow riparian vegetation would be established at the mitigation site along with vegetated upland buffers to provide habitat for the local least Bell's vireo population.

2) Measures to provide cowbird control.

Compliance: The requirement for cowbird control and an implementation plan will be evaluated during the environmental review and forthcoming Section 7 consultation with the USFWS for the project.

D-23 (cont.)

3) Measures to protect against detrimental edge effects.

Compliance: The JPA site includes berms to protect the mitigation site from edge effects due to flood scour and human encroachment. The bridge itself is an existing structure and the proposed design provides for a higher structure well above the adjacent habitat areas, making it difficult for humans to access the habitats areas. Trails are not proposed by the project. Potential future equestrian trails would be above and along the perimeter of habitat area to reduce the potential for encroachment. Once the bridge is complete, noise impacts would return to pre-construction levels and are not anticipated to effect the nearby vireo population. As the new bridge replaces an existing bridge, the preconstruction condition already tolerated by the adjacent vireo population is anticipated to be the same after the new bridge is complete.

Northern Harrier

1) Manage agricultural and disturbed lands within four miles of nesting habitat to provide foraging areas.

Compliance: MHPA lands occur to the west and south of the proposed project and include the JPA Mitigation Site, which is proposed for restoration and creation of habitat. Although the JPA Mitigation Site was previously farmed agricultural fields, as stated in Section 3.1.2.1, Existing Land Uses, of the Draft EIR, no agricultural lands occur in the MHPA in the vicinity of the project, and the disturbed lands to the west of the project in the MHPA are part of an actively used dirt parking lot for the Horse Park which makes in unsuitable as a nesting area for this species. Therefore, the project is in compliance with this ASMD.

2) Include an impact avoidance area (minimum 900 feet) within the preserve around active nests.

Compliance: The proposed project would not have direct impacts on MHPA preserve lands to the west. Pre-construction nest surveys are required to be conducted if construction activities are to occur during the breeding season of this species. Protective measures are required to be implemented if an active northern harrier nest is detected.

3) Include measures to maintain winter foraging habitat in MHPA preserve areas in Proctor Valley, around Sweetwater Reservoir, San Miguel Ranch, Otay Ranch, Lake Hodges, and San Pasqual Valley.

Compliance: The proposed project is not located in MHPA preserve areas in any of the identified regional locations.

D-24 This mitigation measure has been edited as requested for additional clarity of the process.

RESPONSE

	D-25	Mitigation measure Bio-11 II.D has been amended to clarify the process and
Mr. Jeffrey Szymanski (FWS/CDFG-12B0364-16CPA0031) Enclosure Page 5		response in Section 3.12 and 6.0 of the Final EIR. The measure now indicates
Page 3.12-54. According to mitigation measure Bio-11 II.D., should any Ridgway's rails be detected in the limits of disturbance, vegetation removal activities will be halted temporarily while the project biologist flushes the rail(s) from the area to be cleared into existing emergent vegetation west and east of the bridge. Pursuant to Fish and Game Code section 3511(b)(9), Ridgway's rail is identified as a fully protected species, thereby take of the species is prohibited (CDFW § 86). Accordingly, the Department has no mechanism to authorize the lawful take of a fully protected species associated with this project. Under Fish and Game Code section 86, take is defined "hunt, pursue, catch, capture, or kill."		that the project biologist shall temporarily halt construction activities if a Ridgway rail(s) is detected in the vicinity of project activities. As part of daily monitoring, the project biologist shall evaluate the response of the fully protected species that come near the project site and implement the appropriate response actions. Biological monitors will notify the construction manager of any activities that may harm or harass a fully protected species and recommend suspending those activities so that the key personnel may be notified and
Page 3.12-56. Ridgway's Rail Measures. Due to the high probability of project-related adverse effects to several pairs of Ridgway's rails, the proposed loss of Ridgeway's rail habitat (including the southern willow scrub and the mulefat scrub adjacent to the occupied marsh) should be offset prior to commencement of project impacts to rail habitat. The creation and enhancement of Ridgway's rail habitat	D-26	apprised of the situation and the potential conflict can be resolved. Mitigation Measure Bio-1 indicates that a final restoration plan is required to be
commencement of project impacts to rail habitat. The creation and enhancement of Ridgway's rail habitat will take a number of years to mature and thus provide the basic constituent elements for this species (e.g., cover, prey, refuge, etc.). Therefore, compensatory creation and enhancement occur prior to the destruction of Ridgway's rail habitat to minimize the temporal loss of its functions and values.	D-20	prepared prior to the start of road or bridge construction. The request to restore the JPA mitigation area prior to commencement of the road and bridge
The NES (Section 4.6 Operational Noise Attenuation Measures) identifies the Wildlife Agencies' comments that requested the bridge design incorporate noise attenuation measures, such as noise walls or rubberized concrete. The discussion concluded that while noise walls appear infeasible, the City will consider using rubberized concrete on the bridge during final design to reduce noise resulting from tire road contact. However, we were unable to locate this discussion or acknowledgment within the RDEIR.		improvements has been noted. SANDAG will design and implement the City's restoration requirements on the JPA site as part of the W-19 Restoration project per the pending Council approval of a memorandum of agreement between SANDAG and the City of San Diego.
Please ensure this discussion is included in the body of the final RDEIR and not limited to the technical appendices. We strongly encourage the City include REC as a component of the bridge design. The project proposes to steepen embankments to 1.5:1 slopes and line them with rip rap to accommodate a	D-27	While rubberized concrete on the bridge to reduce noise resulting from tire road contact was considered in the process, it has been determined that the City only installs and maintains standard concrete; therefore, this discussion was not
trail under the bridge, which will impede Ridgway's rail movement. Wildlife movement paths without rip rap should be provided on both embankments. We recommend providing these paths by lengthening the bridge such that the project does not need to place fill in the channel, and steepen the embankments and line them with riprap to accommodate the trail.		carried forward as a measure in the EIR.
Page 5-17. The discussion states that the EAA is the most vulnerable of the alternatives to erosion. We are	D-28	See response to #15 above.
D-29 D-29 D-29 D-29 D-29 D-29 D-29 D-29	D-29	The identification of the Eastern Alignment and Roundabout alternatives as being comparatively most vulnerable to erosion under the category of Geology/Seismicity/Soils in Table 5-1 of the Draft EIR is a reflection of relatively greater new embankment slopes being created, in particular at the Horsepark/Polo Club field driveways. As noted in Section 3.8.3.4 of the Draft EIR, "All slopes constructed for project facilities, including the raised roadway, driveway access to Horsepark and existing Polo Club fields, re-created open drainage ditches, and modified river banks could be subject to damage from
that the acreage impacts reported in the Biology Resource section are similar to acreage impacts provided in the Alternatives analysis of the REIR.		erosion if not appropriately protected. Measures recommended in the geotechnical report that would be incorporated into the project to preclude adverse impacts include excavating keys at the toes of embankments 2 or more feet into competent fill or alluvium, compacting slope faces, and hydroseeding embankment slopes with drought-tolerant vegetation as soon as practicable after construction." The alternatives are all determined to have similar erosion potential in the river, and mitigation for that issue is presented in Section 3.7.5 of the Draft EIR.

D-30 Section 3.12 of the Draft EIR presents a detailed impact analysis of impacts to sensitive biological resources, and provides mitigation measures to reduce significant impacts to below a level of significance, including creation of wetlands. The summary table in Section 5 of the Final EIR has been revised to include impacts to CDFW jurisdictional areas. A note to Table 5-1 has also been added to explain that "Acreages for USACE/RWQCB and CDFW impacts are not additive and occur within Total Wetland Impacts, as presented in Table 3.12-4."

		Letter I	Ξ		
~5	San Dieguito Riv Joint Powers Aut 18372 Sycamore Escondido, CA 9 (858) 674-2270 www.sdrp.org	ver Park thority e Creek Road]		
JONT POWERS AUTHORITY BOARD OF DIRECTORS Dail Not City Council Vice-Chair Diame Jacob Supervisor, County of San Diego Olga Diar Escendido City Council Dave Grach San Diego City Council San Diego City Council San Diego City Council Dave Ziad San Diego City Council Dave Ziad San Diego City Council Dave Ziad San Diego City Council Citates Advisory Committee Bedy Barting, Ex Officio Bedy Barting, Ex Officio Reich Directors Interim Executive Director	Escondido, CA S (858) 674-2270 (858) 674-2270 www.sdrp.org November 23 Jeffrey Szym Environment City of San E 1222 First Av San Diego, C Subject: Dear Mr. Szy Thank you fc comments ine previous com San Diegoito included in th the JPA's bot these comme JPA Board re member ager planning and The JPA app Coast to Cres undercrossing bridge. The F the project de the JPA inclu and adding a features, as d San Dieguito final project of included as a The JPA dete trail (as desen a trail connect	 ²⁰²⁵ Fax (858) 674-2280 ⁸, 2015 ⁸, 2015 ⁸, anski ^{al} Planner ⁹Diego Development Services ve, MS 501 ²A 92101 ⁸Comments on Recirculated Draft EIR ^{El} Camino Real Bridge / Road Widening Project No. 2982/ SCH No. 1999071104 ⁹manski: ⁹or the opportunity to comment on the Recirculated Draft EIR. The ^{el}eluded in this letter are based on the San Dieguito River Park JPA's ments on the City's 2006 project DEIR (October 20, 2006) and on the ^{River Park} goals and objectives adopted by the JPA Board and re San Dieguito River Park Concept Plan. However, due to the timing of ard meetings and the public review deadline for the Recirculated DEIR, nts were not able to be submitted by the deadline without first receiving eview and approval. The JPA Board would hope that the City, as a ley of the JPA, consider these comments as it moves forward in the review of this project. ¹⁰reciates the fact that City staff has worked with us to accommodate the st Trail as part of this El Camino Real road widening project with a trail g and the ability to add a trail cantilever on the west side of the new Secirculated DEIR is thorough and we appreciate the changes made to esign since 2006 in response to concerns voiced by the community and ding reducing the width of the bridge to 76 feet and the road to 104 feet landscaped parkway to both sides of the bridge and other aesthetic escribed in Section 2.2.10, to reduce impacts to the scenic quality of the River Valley. We hope to continue working with the City during the design to ensure the Coast to Crest Trail undercrossing is designed and component of replacing the El Camino Real Bridge. ¹⁰rmined that it could not assume ownership of the existing bridge for a ribed in the Recirculated DEIR). The JPA is instead would prefer to see 	E-1 E-2 E-3	E-1 E-2 E-3	This is an introductory comment which summarizes the project description and changes in the project since 2006. Because the comment does not raise any issues regarding the sufficiency of the EIR in identifying and analyzing impacts or avoidance and mitigation measures, no further response is required, per CEQA Guidelines Section 15204. This comment explains that JPA comments on the Recirculated Draft EIR are based on the JPA's comments on the 2006 EIR and notes that there were scheduling issues affecting Board approval of comments. Because the comment does not raise any issues regarding the sufficiency of the EIR in identifying and analyzing impacts or avoidance and mitigation measures, no further response is required, per CEQA Guidelines Section 15204.
		ry functing to design and implement the canonever train.			EIR.

Mr. Szymanski Page 2	E-4	Sectio Draft variou
 Following are the JPA's specific comments on the Recirculated DEIR: 1. The Lower Elevation alternative would not provide for the needed connection for the Coast to Crest Trail under the new bridge and, therefore, is not consistent with the goals and objectives of the Concept Plan. 2. Although the DEIR includes a Roundabout Alternative, the alternative is rejected in the DEIR does not include any data comparing the Roundabout design to the traditional intersection design regarding visual quality, air quality, noise, and safety. In 2010 the City's engineering staff presented supportive and compelling information to several area community groups including the San Dieguito River Park's Citizens Advisory Committee and the Carmel Valley Community Planning Board about the benefits of roundabouts for this road widening project. Benefits cited included greater pedestrian and bicycle safety, traffic calming, improved aesthetic design, improved traffic flow and slower vehicle speeds, and better air quality (lower pollutants). Given the unique landscape and visual quality of the western San Dieguito River Valley, the benefits of using roundabouts in the El Camino Real road design should be more thoroughly discussed and considered in the 		coasta that th pass t feature equest that oo would area, Altern Enviro of the conclu would forth i the Lo
 3. Page 1-7, second paragraph under Section 1.3.3.3: Please state that the Coast to Crest Trail in the project vicinity is complete from Jimmy Durante Boulevard (in Del Mar) to EI Camino Real and currently dead ends at EI Camino Real. 		notes Alterr this is
 4. Although Section 2.2.11 of the DEIR describes the proposed Coast to Crest Trail undercrossing in general, it is not clear how the new undercrossing would physically connect to the existing trail segments on Horse Park (west) and Polo Fields (east) nor how pedestrians and cyclists traveling on the new El Camino Real bridge would access the trail. Particularly in the case of the Horse Park trail segment, it appears the trail would need to be extended towards the east for the Eastern Alignment alternative. In addition, page 2-20 of the DEIR describes a new drainage swale along the toe of the entire eastern embankment slope for the Eastern Alignment. It is not stated how the trail undercrossing would connect to the existing trail on the Polo Fields. The JPA is willing to work with the City engineering staff and review the construction plans when they are available to ensure those connections are designed and made a part of project implementation. 5. Trail users can access the Coast to Crest Trail today from El Camino Real. Please describes here the trained access the the coast to Crest Trail today from El Camino Real. Please describes here the trained access the Coast to Crest Trail today from El Camino Real. Please describes here the trained access the Coast to Crest Trail today from El Camino Real. Please describes here the trained access the Coast to Crest Trail today from El Camino Real. Please describes here the trained access the Coast to Crest Trail today from El Camino Real. Please describes here the trained access the Coast to Crest Trail today from El Camino Real. Please describes the trained access the Coast to Crest Trail today from El Camino Real. Please describes the trained access the Coast to Crest Trail today from El Camino Real. Please describes the trained access the Coast to Crest Trail today from El Camino Real. Please describes the trained access the Coast to Crest Trail today from El Camino Real. Please describes there the trained access the Coast to Crest Trail today fro	E-5	The L full ra quality hazard sectio the pe terms enviro Alterr preser good
 describe how that situation would change with the proposed project. 6. The DEIR should not refer to the proposed undercrossing as the "JPA Trail or JPA undercrossing". It is a component of the San Dieguito River Park "Coast to Crest Trail". Table 3.1-5 also incorrectly refers to the trail as the "JPA trail". The undercrossing would facilitate the existing segment of the Coast to Crest Trail to continue from Horse Park 	E-6	This r Final multi- The C Boule Camin

RESPONSE

on 3.1.3.4, Issue 2: Conflict with Environmental Plans or Policies of the EIR addresses consistency of the proposed project alternatives with us plans including the Master Plan for the San Dieguito River Valley al area and the San Dieguito River Park Concept Plan. The analysis notes he Lower Elevation Alternative would only raise the bridge high enough to the 100-year flood, so an elevated platform undercrossing would not be a re of this alternative, but the lack of an undercrossing would not prohibit strians or other travelers from crossing under the bridge in the same way ccurs currently for the existing bridge. Also, none of the build alternatives d interfere with the JPA's ability to complete their trail through the study although many of the alternatives, including the Eastern Alignment native, which is the City's Preferred Alternative and concluded to be the onmentally Superior Alternative, would actively facilitate many elements Coast to Crest Trail. From an overall planning perspective, the Draft EIR udes that the proposed El Camino Real Bridge/Road Widening Project d be consistent with the goals, objectives and development standards set in the San Dieguito River Park Concept Plan. The JPA's opinion regarding ower Elevation Alternative is acknowledged. Table 5-1 in the Draft EIR that under the issue of facilitation of JPA plans, the Lower Elevation native "Does not provide additional undercrossing clearance." Therefore, ssue has been sufficiently disclosed in the Draft EIR.

- E-5 The Draft EIR addresses all build alternatives at an equal level of detail for a full range of environmental issues, including visual quality (Section 3.3), air quality (Section 3.10), noise (3.11), and hazards (3.2 for traffic and 3.8 for hazardous materials). The Roundabout Alternative is included in all of these sections. Also, all alternatives are compared in Table 5-1; Section 5 discusses the performance of each alternative including the Roundabout Alternative in terms of issues that help distinguish the alternatives for identification of the environmentally superior alternative. The full detail analysis of the Roundabout Alternative presented in the Draft EIR is consistent with the level of detail presented for all of the other build alternatives and is considered to represent a good faith effort at full disclosure, as required by CEQA.
- E-6 This reference has been corrected as requested. Section 1.3.3.3, Page 1-7 of the Final EIR now reads as follows: "This Coast to Crest trail is intended to be a multi-use trail for hikers, joggers, nature enthusiasts, equestrians, and bicyclists. The Coast to Crest Trail in the project vicinity is complete from Jimmy Durante Boulevard (in Del Mar) to El Camino Real and currently dead ends at El Camino Real."

E-7	Although details of design would need to be developed for the selected alternative, impact footprints to accommodate trail connections were included in the project and are indicated in Figure ES-1 of the Executive Summary. For the Eastern Alignment in particular, Figure 2-9 indicates the areas east and west of the north end of the bridge that would be involved in trail connections. Bicyclists and pedestrians on relocated and widened El Camino Real in this alternative could access the trail from the frontage road connection at the Horsepark/Polo Club entrance. The City will continue to work with the JPA during the final engineering phase.
E-8	Section 3.2.3.6, Issue 2: Impacts on Pedestrians, Bicyclists, and Equestrians, of the Draft EIR addresses access conditions under existing and proposed project conditions for each alternative. Conditions after project completion for pedestrians, bicyclists, and equestrians are summarized in Table 3.2-13 of the Draft EIR.
E-9	This reference has been corrected as requested. Table 3.1-5, under recommendations for Subarea I on page 3.1-27 of the Final EIR, now reads: "All of the build alternatives except the Lower Elevation Alternative would incorporate a raised undercrossing under the north abutment of the bridge to accommodate a multi-use trail for a component of the Coast to Crest Trail." Section 3.1.3.4, page 3.1-40 now reads: "However, the alternatives would not prohibit the San Dieguito River Park from constructing a trail under the southern end of the bridge as part of their plans."
	Section 3.3.2.6, page 3.3-9 reads: "The Coast to Crest Trail exists along the entire southern edge of Horse Park to El Camino Real. Currently, there is no Coast to Crest Trail on the west side of the bridge"
	Section 5.1.5, page 5-5 now reads: "None of the alternatives would provide an elevated undercrossing under the southern end of the bridge, but the San Dieguito River Park would not be prevented from constructing an undercrossing there if that location were chosen for the Coast to Crest Trail"
	Table 5-1, page 5-10 now reads: "Facilitation of an existing segment of the Coast to Crest Trail plans"

Mr. Szymanski Page 3 E-9 (end of second paragraph). E-9 cont. 7. Although the DEIR describes a trail cantilever on the west side of the new bridge, the cantilever is not shown on Figure 2-22. We understand the cantilever would be funded and built by others but because it is included in the project description as a proposed feature and analyzed in the DEIR, it should be added to the General Plan shown in Figure 2-22 or in a separate graphic. E-10 8. Figure 2-22 should refer to the Coast to Crest Trail undercrossing, rather than "equestrian trail". The undercrossing should also be labeled on all the plan profiles (Figures 2-5 through 2-10). E-11 9. The DEIR does not correctly describe the current condition of the Coast to Crest Trail In the project area. The DEIR does not identify the fact that the Coast to Crest Trail Horse Park segment currently exists and dead ends at El Camino Real. Page 3.1-4 under "Project Site Land Uses" should include that trail segment. The statement in Section 3.3.2.6 (end of first paragraph) needs to be updated to reflect the fact that the CTC Trail should be be mentioned throughout Table 3.1.5. The description on page 3.1-36 should be updated to reflect the current condition. E-13 10. The Coast to Crest Trail undercrossing should be added to the Construction Steps listed in section 2.2.15. E-14 11. The information on page 3.1-38 about segments 11 and 12 should be eliminated as the Coast to Crest Trail has been completed in this area and those two alternative alignments were not constructed. E-14 12. It is unclear why the DEIR assumes chain link fencing would be used on the trail cantilever, which then results in a conclusion of an unmitigable visual i	 E-10 The commenter is correct in that the concept of a cantilever trail is included in the project description for all build alternatives, as indicated in Table 2-1. The cantilever would be approximately 8 feet in width, Americans with Disabilities Act -accessible with a protective fence and support structures. However, details about the design and materials for the cantilever have not been provided because funding has not been identified and the facility would be built by others. Figure 2-22 for the Eastern Alignment has been corrected to add corbels for a future equestrian trail as shown on Figures 2-20 and 2-21 for the other build alternatives. However, a new or separate graphic has not been repared as the ultimate design of the future cantilever has not been developed as part of this project. E-11 Figures 2-5 through 2-10 and 2-22 of the Final EIR have been revised to reflect this correction. E-12 These references have been corrected as requested. The Final EIR now includes the following revisions: Section 3.1.2.1, Page 3.1-4 includes: Coast to Crest Trail Horse Park segment, which dead ends at El Camino Real Section 3.3.2.6, page 3.3-9 includes: "The Coast to Crest Trail exists along the entire southern edge of Horse Park to El Camino Real." Edits have been made to Table 3.1-5, including the addition of text explaining: "The Coast to Crest Trail Horse Park segment now exists along the entire southern edge of Horse Park to El Camino Real. All build alternatives except the Lower Elevation Alternative would raise the bridge high enough to accommodate an elevated multi-use trail under-crossing under the bridge northern abutment, compatible with the existing Coast to Crest Trail alignment." Page 3.1-37 now reads: "Also, a new trail access has recently been provided near the entrance to Del Mar Horsepark off of El Camino Real with an interpretive kiosk for the east end of the trail."
 railings to reduce view blockage from the cantilever to the river. Vertical pickets would allow much better views toward the river than chain link and is a safer design as they reduce the ability to climb the fence. An example of a vertical picket railing used to preserve views of the river on a trail cantilever that exists in San Pasqual Valley along the Bandy Canyon road bridge. This design could potentially mitigate the visual impact to below a level of significance. The plans and a photograph from the Bandy Canyon bridge cantilever are enclosed. 13. The minimization of street lighting mentioned on page 2.2-10 of the DEIR to improve the E 16 	near the entrance to Del Mar Horsepark off of El Camino Real with an interpretive kiosk for the east end of the trail."E-13 The trail will likely be a part of the grading that occurs with the construction of the proposed bridge abutment at this location. The undercrossing under the north end of the bridge has not been added to the Construction Steps since this would
aesthetics of project design should be addressed in the Visual/Aesthetics mitigation measures.	be considered a minor construction operation.

E-14	This reference has been corrected as requested. Section 3.1.3.4, Page 3.1-39 of the Final EIR now reads as: "Segments 11 and 12, which extend southward have been completed. Segment 13, which extends northward on the west side of El Camino Real, presented on Figure 3.1-6, is described as follows in the master plan: "Segment 13 would extend along the west side of El Camino Real to bring the pedestrians and equestrians to a crossing under the El Camino Real bridge on the south side of the San Dieguito River. Again, the undercrossing would be designed as part of the final design for the future widening of El Camino Real, and environmental impacts would be evaluated at that time."
E-15	The additional information provided in this comment and attachment for trail cantilever fencing is acknowledged. As stated in Section 2.2.11 of the Draft EIR, "Although evaluated in this EIR, the cantilever would not be constructed as part of the project unless funding from outside sources beyond the City or the federal HBP is identified. If funding for the cantilever is not identified at the time of bridge construction, support structures (corbels) would be installed on the bridge during construction to facilitate later placement of the cantilever by others." Because design of the trail on the bridge is unknown at this time and would be prepared by others, the Draft EIR has presented an analysis of the most conservative (worst case) future condition, which is that the fencing would block public views and result in a significant and unmitigated visual impact. At this time, the environmental document cannot reasonably assume that a particular design avoiding significant visual impacts would be implemented.
E-16	Section 2.2.10 of the Draft EIR project description states, "Low sodium type lighting would be provided at the modified intersections and the Horsepark/Polo Club driveway intersection with El Camino Real. Continuous street lighting would not be installed. Street lights would be housed in Mission Bell fixtures with horizontal cut-off and would be shielded downward." As discussed in the analysis of light and glare impacts in Section 3.3 of the Draft EIR, the proposed lighting fixtures "would not result in a substantial light source since they would be consistent with City of San Diego 'dark sky' guidelines to prevent night pollution. No impacts are expected from any of the project alternatives." Since proposed lighting fixtures are included as project features and light and glare impacts were determined to be not significant, there is no need to include street lighting in the Visual/Aesthetics mitigation measures.

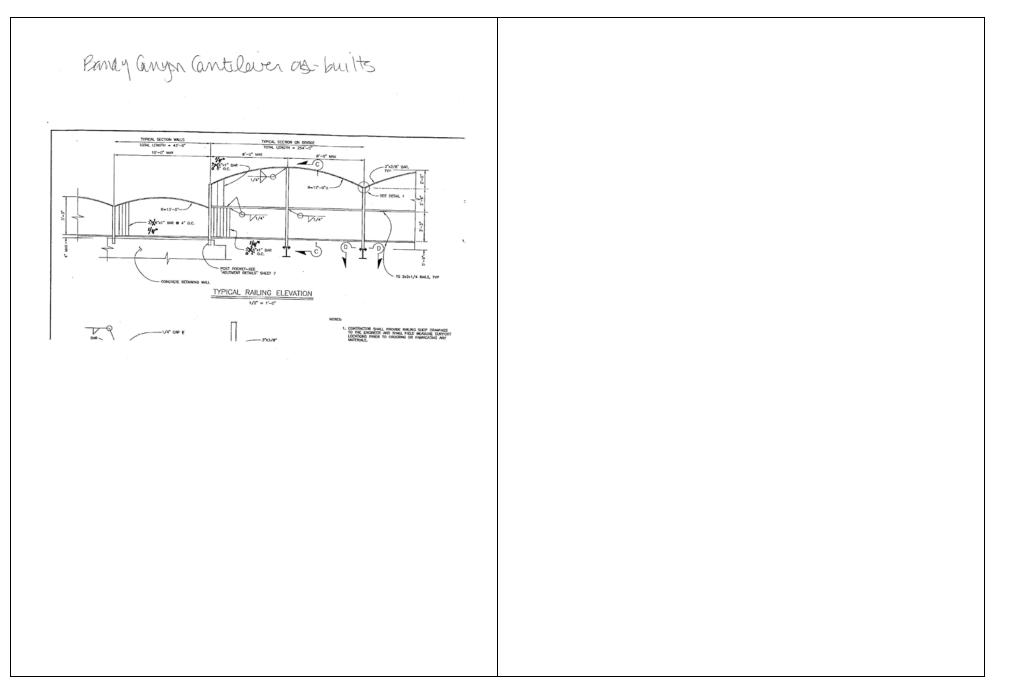
Mr. Szvmanski Page 4 Section 3.11.4.2 of the Draft EIR concludes that construction noise levels at E-17 E-17 sensitive receptors would not exceed 75 dBA hourly equivalent sound level 14. The noise contours produced by diesel-powered pile driving extend a distance of two (Leq), nor would noise levels substantially interfere with the operations of miles along the Coast to Crest Trail (at 60 dBA and higher). We would urge the City to nearby businesses or sensitive receptors. Noise impacts would be less than implement the much quieter hydraulic powered pile drivers discussed in the DEIR to significant during construction. Figure 3.12-5 of the Draft EIR indicates that for reduce noise impacts to the recreating public. - E-18 diesel pile driving, the 75 dBA Leq noise contour would extend to 730 feet, 15. The project should be consistent with the other City road widening projects in the area, approximately 0.14 mile. This figure shows the 60 dBA Leq noise contour specifically the widening of Via de la Valle, where all utilities are to be undergrounded. would extend to 4,100 feet, which is approximately 0.78 mile. The JPA's Why isn't utility undergrounding part of this project? - E-19 preference for hydraulic powered pile drivers is acknowledged and is now part Please feel free to contact our Principal Planner Shawna Anderson at shawna@sdrp.org if you of the public record. Because the comment does not raise any issues regarding would like to discuss these comments further. the sufficiency of the EIR in identifying and analyzing impacts or avoidance and Sincerely, mitigation measures, no further response is required, per CEQA Guidelines Section 15204. Mald E. Mo= Future undergrounding projects are scheduled to occur in the area and consist of E-18 the UU994 Via de la Valle and UU588 El Camino Real projects and will be covered/analyzed in a separate environmental document being prepared by the Donald Mosier JPA Board Chair Planning Department for the T&SW UUP program. The applicant department for the El Camino Real project (Public Works Department) is coordinating with Attachments staff from the Transportation and Storm Water, Utilities Undergrounding Passed November 20, 2015 JPA Board Meeting: Program to ensure that the design for the undergrounding of the overhead utilities can be incorporated into the El Camino Bridge project design. The AYES: 7 (MOSIER, JACOB, DIAZ, GROSCH, ROBERTS, ZITO, GOLICH) Public Works Department will coordinate the installation of the underground utilities with the Transportation and Storm Water, Utilities Undergrounding Program within the project limits for the El Camino Real Bridge project so that construction would not have to occur twice in the same area. This comment is a closing statement. Because the comment does not raise any E-19 issues regarding the sufficiency of the EIR in identifying and analyzing impacts or avoidance and mitigation measures, no further response is required, per CEQA Guidelines Section 15204.

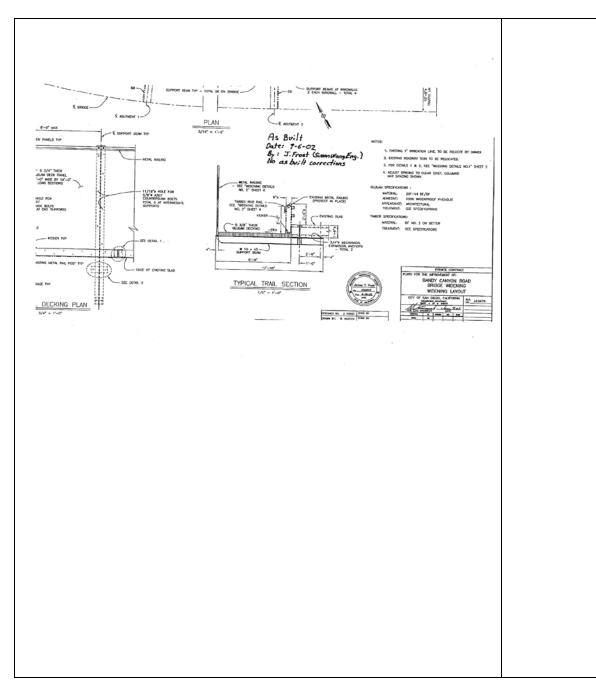
RESPONSE



Cantilever on Bandy Canyon Bridge at San Pasqual Trail

View from Bandy Canyon Cantilever along San Pasqual Trail





Letter F CARMEL VALLEY COMMUNITY PLANNING BOARD Attn: Allen Kashani, CVCPB Secretary 13400 Sabre Springs Pkwy, Ste. 200 San Diego CA 92128 858-794-2571 / Fax: 858-794-2599	
November 8, 2015	
Jeffrey Szymanski, Environmental Planner City of San Diego Development Services Center 1222 First Ave., MS 501 San Diego, CA 92101	
Subject: El Camino Real Bridge/Road Widening Project Project No. 2982/SCH No. 1999071104	F-1 Recommendations from the Task Force are discussed in Section 2.5.2 of the Draft EIR. This section notes that the Task Force examined information
Dear Jeffrey:	provided by City traffic engineers for roundabouts at the key intersections of Via de la Valle and El Camino Real, and San Dieguito Road and El Camino Real. The Draft EIR notes, "In response to task force recommendations, the full
For a brief historical perspective, in September 2006, then Council President Scott Peters and Mayor Jerry Sanders convened a task force composed of community leaders, conservation organizations and other stakeholders, such as property owners and developers to explore and suggest roadway-widening alternatives to improve traffic flow on Via de la Valle and El Camino Real. The composition of the task force was in response to the community-wide objections to the city's proposed road widening projects. The Western San Dieguito River Valley/NCFUA Subarea II Task Force, which I chaired met on numerous occasions and on February 15, 2007 published our Final Recommendations, which included the limiting of the widening of Via de la Valle and El Camino Real to consider roundabouts at the intersections.	widened roadway cross section for most of the build alternatives was modified to be reduced to a total width of 104 feet." The City also added a Roundabout Alternative to the recirculated EIR with the alignment set in the same location as the Eastern Alignment in order to quantify impacts and traffic operational characteristics for comparison to other build alternatives. The Roundabout Alternative is addressed at an equal level of detail as the other build alternatives in this recirculated EIR. The Task Force Alternatives are discussed in more detail in Section 5.1.5 of the EIR as alternatives considered but rejected from
We have been discussing, learning, thinking, suggesting, commenting and reacting to the designs for the widening of Via De La Valle and El Camino Real and the new bridge since before the formulation of the task force (almost fifteen years). Many of us use these roadways daily, and the Carmel Valley Community Planning Board constantly receives questions from residents, businesses and would-be trail users about when these improvements will finally happen and what they will look and feel like. Our goal throughout has been that these improvements should not just carry traffic, but should also protect and enhance wildlife habitat and movements and people's enjoyment and appreciation of the river valley.	 further analysis. F-2 This comment summarizes the thought processes of the Carmel Valley Community Planning Board about proposed changes to El Camino Real. Because the comment does not raise any issues regarding the sufficiency of the EIR in identifying and analyzing impacts or avoidance and mitigation measures, no further response is required, per CEQA Guidelines Section 15204.
As you are aware the western San Dieguito River Valley is the northern gateway to Carmel Valley, the City of San Diego and Rancho Santa Fe/County of San Diego. We support the San Dieguito River Park Concept Plan, and we value all of the efforts by citizens groups and agencies, including Caltrans, SDG&E, the SDRP JPA, the SDRVC, and the Friends of the Lagoon, to preserve and restore our natural open space of critical riverine habitat, wetlands and agricultural and rural land uses. The river valley also provides recreational opportunities and sweeping views of the flood plain and valley.	F-3 This comment summarizes entities involved in preserving and restoring the San Dieguito River Valley and various benefits provided by the river valley. Because the comment does not raise any issues regarding the sufficiency of the EIR in identifying and analyzing impacts or avoidance and mitigation measures, no further response is required, per CEQA Guidelines Section 15204.

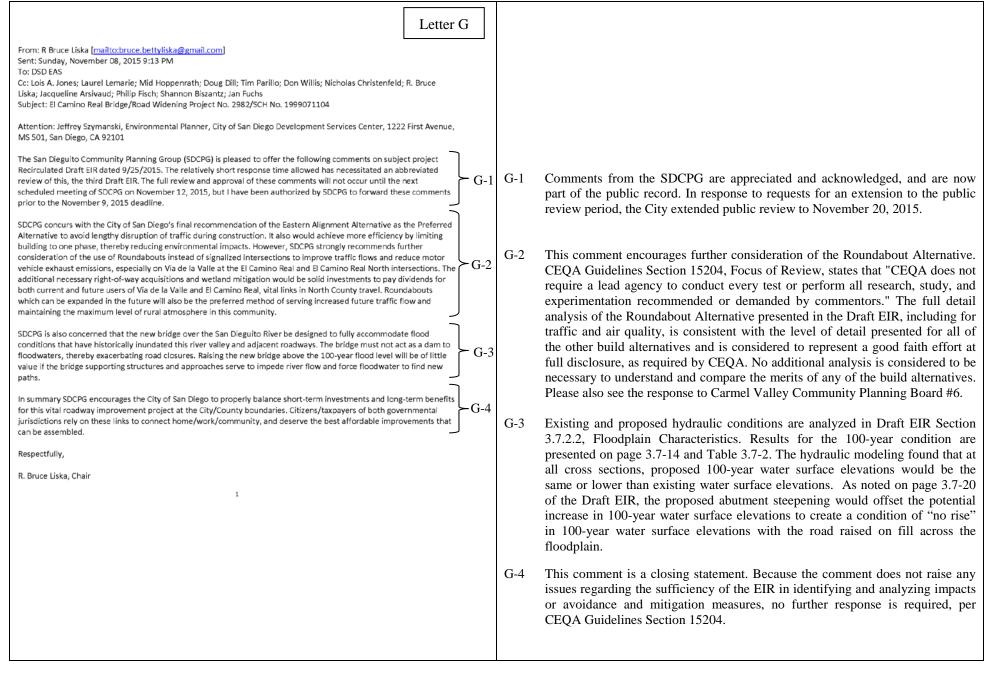
Jeffrey Szymanski, Environmental Planner November 8, 2015 pg. 2	F-4 The lack of opposition to a roundabout alternative is acknowledged. Because the comment does not raise any issues regarding the sufficiency of the EIR in identifying and analyzing impacts or avoidance and mitigation measures, no further response is required, per CEQA Guidelines Section 15204.
We are pleased that the DEIR includes a roundabout alternative. In anticipation of this possibility we have asked all the recent development projects that will provide a fair share of the funding to promise that they would not oppose a roundabout solution. They have all agreed. Therefore, we provide the following comments, suggestions and requests to the Draft Recirculated EIR.	F-5 The request for additional design details and a computer generated travel video for the Roundabout Alternative is acknowledged. CEQA Guidelines Section 15204, Focus of Review, states that, "CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation
 Notwithstanding our support of the Roundabout Alternative we believe that it deserves more discussion and design details and an understandable depiction. Perhaps a computer generated travel video showing its navigation would help the community and other stakeholders make a better informed decision on its merits. 	recommended or demanded by commenters." The full detail analysis of the Roundabout Alternative presented in the Draft EIR is consistent with the level of detail presented for all of the other build alternatives and is considered to represent a good faith effort at full disclosure, as required by CEQA.
2. We have learned from City staff that replacing conventional intersections with roundabouts would actually shorten travel time from point A to point B - say from the northern edge of Carmel Valley to Flower Hill, or from Flower Hill to Rancho Santa Fe or Fairbanks Ranch via San Dieguito Road. The average speed throughout the improved area would be about 35 MPH, but drivers would not spend time stopped at red lights. A slower but steady speed would also reduce air and water pollution from brake dust and exhaust from idling and rapidly accelerating cars. Please confirm this understanding of the roundabout's merit.	F-6 This comment presents broad generalizations but no data or specific references. The Draft EIR presents specific analysis of the Roundabout Alternative for traffic (Section 3.2), air quality (Section 3.10), and water quality (Section 3.7). Traffic operation analysis of the Roundabout Alternative is presented in Section 3.2.3.3 of the Draft EIR, which concludes, "The analysis indicates that most of the roundabouts would operate with minimal overall delays and a high level of
3. We have been told that large diameter two-lane roundabouts can accommodate large trucks and trailers, such as those carrying horses and delivering feed and supplies to the local businesses. Staff even offered to stake out the roundabouts in a parking lot so people with large trucks could prove to themselves that they would work. Emergency vehicles can if necessary travel over the centers of the roundabouts. Please provide the demonstration staking.	service (LOS) of A or B in existing plus project and 2035 conditions. However, the roundabout at Via de la Valle and El Camino Real would operate at unacceptable LOS E and F in the 2035 A.M. and P.M. peak hour, respectivelyAn expanded design (designated in the roundabout study as the "ultimate" design for this roundabout) that would add a second southbound lane and a northbound dual right turn partial bypass would improve the operations of
4. We have been presented with diagrams and photos demonstrating that two-lane roundabouts can accommodate bicyclists safely and also that equestrian trails would work with the roundabouts. Nevertheless, we need to resolve to our community their concerns about bicycle and pedestrian crossings at the roundabouts. For example, cars are traveling the roundabouts without stopping and the cars exit the circle directly into a street where pedestrians cross. Navigating the multi-lane roundabouts may be difficult for bicyclists especially the EI Camino intersection with Via de la Valle, because it has significant traffic from 3 points on the roundabout. As an existing example, the single lane roundabout between Carlsbad and Oceanside on the coast highway has been commented as confusing to some. Please provide further documentation and analysis that cars, bicyclists and pedestrians can safely navigate the roundabouts. Perhaps an analysis by a roundabout design specialist(s) would be helpful. The DEIR should also show how equestrian trails would work with the roundabouts.	this roundabout to LOS A for A.M. and P.M. peak hours in 2035. However, the City would not build the ultimate design if the Roundabout Alternative is selected in order to minimize the footprint of this alternative." The Eastern Alignment would operate at LOS D/D in 2035 with signalized intersections. In terms of operations, the build alternatives would either provide acceptable LOS in 2035 or result in a LOS that would be no worse than the No Build condition in 2035. Not improving the LOS does not represent a significant impact. : Therefore, although the Eastern Alignment Alternative would have better LOS in 2035 than other alternatives, including the Roundabout Alternative, none of the build alternatives are concluded to have significant long-term traffic impacts.
	Air quality issues are addressed in Section 3.10 of the Draft EIR, which concludes that during operation, none of the build alternatives would result in emissions that would violate air quality standards, and impacts would not be significant.

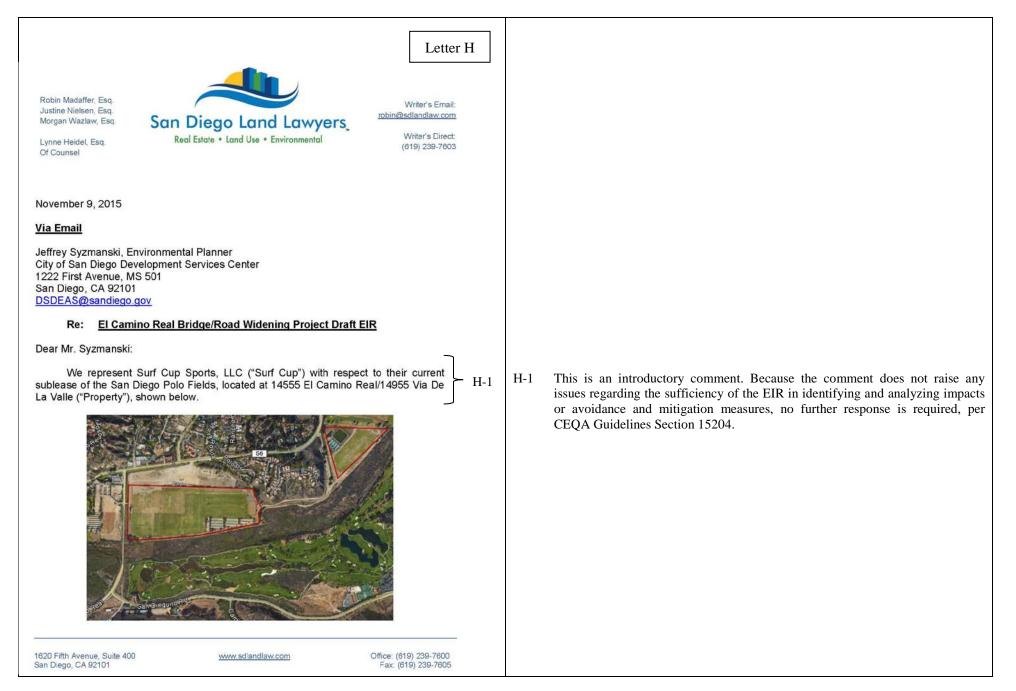
F-6 (co	Water quality issues are addressed in Section 3.7 of the Draft EIR, which concludes that impacts of any of the build alternatives would not be significant after construction is completed because all alternatives would comply with the City Water Quality Standards.
	All of the build alternatives are compared in Section 5.3.1 of the Draft EIR in terms of all environmental issues addressed in detail, including traffic, air quality, and water quality. The comparison concludes that the seven build alternatives would generate similar impacts and perform similarly in terms of various issues including air quality and water quality, and would have different levels of impact and performance in terms of other issues including traffic/circulation.
	The analysis in the Draft EIR of the topics mentioned in this comment is considered to represent a good faith effort at full disclosure, as required by CEQA, and no additional analysis is considered to be necessary to understand and compare the merits of any of the build alternatives.
F-7	Long-term impacts on local access are addressed in Section 3.2.3.4 of the Draft EIR. Regarding the Roundabout Alternative, the Draft EIR notes that "The Horsepark entrance is proposed to handle WB-67 vehicles which are larger than trucks carrying horse trailers. In general, a WB-67 vehicle was used to design the roundabouts for conservative estimation of the truck paths; the WB-67 has a longer trailer than the standard Caltrans vehicle STAA-STD-50." No issues with truck access would be anticipated with the Roundabout Alternative. No staking is considered to be needed.
F-8	Impacts on pedestrians, bicyclists, and equestrians are addressed in Section 3.2.3.6 of the Draft EIR. Table 3.2-13 shows how conditions would change for these users. The table notes that pedestrians and bicyclists would not benefit to the same extent as with the other full widening alternatives due to unsignalized roundabouts instead of signalized intersections. However, pedestrians and bicyclists would be accommodated, so no significant impacts are identified for this alternative in terms of this issue.

 Jeffrey Szymanski, Environmental Planner November 8, 2015 pg. 3 Regarding the Traffic/Circulation section it is unclear how the forecast traffic volumes were modeled. Was the current 2-lane cross-section of El Camino Real or the proposed 4-lane facility used? The reason being is that if the travel forecast (2035) was based on El Camino Real being two lanes, we may be under estimating the potential traffic volumes (particularly on El Camino Real, south of Via de la Valle) if it's built at a wider facility with more capacity and higher travel speed. Drivers may use it as an alternative route to I-5. Please clarify in terms of what went into the network assumptions for the 2035 model. 	F-9 As explained in Section 3.2.3.3 of the Draft EIR, Year 2035 segment and peak hour forecast volumes were developed by the traffic consultants, reviewed by City staff, and agreed on for analysis. The predicted traffic increases are due to approved and planned growth in the area addressed in other environmental and community planning documents. Traffic volumes were developed from the San Diego Association of Governments Series 12 calibration model calibrated with existing traffic counts and then adjusted to add predicted traffic volumes from cumulative projects. Traffic volume forecasts are not dependent on lane configurations of roadways. The volumes are applied to road geometry in the operational model to develop level of service. Traffic analysis is documented in the technical report entitled Transportation Analysis for the El Camino Real
 6. We understand that a roundabout solution would require more land converted to pavement. But we think, and the DEIR should consider, that the roundabouts might lie more gracefully upon the land, allowing drivers and passengers to relax and appreciate the serenity and fine details of the river valley. We are concerned that stark, straight four-lane roads with many turn lanes and traffic lights will reduce the river valley to a drainage facility, perceived and experienced as an aggregation of ponds and ditches, rather than the wide expanse of upland, marsh and salt and fresh water homes for a vast variety of wildlife that so many people have imagined it would someday be. 7. We are concerned about two issues on page 2-19: "2.2.12 Haul Routes and Staging Area" and "2.2.13 Utility Relocation". The Haul Routes suggests moving all the heavy equipment through Carmel Valley. That is, Del Mar Heights Road to El Camino Real. This is already a heavily impacted area and could become worse to our community's traffic with the construction of One Paseo and the road widening. Please consider that hauling on Via de la Valle would be a more direct route. On the Utilities Relocation, it suggests that overhead power and communication lines should be relocated to the new road alignment. Please consider the better solution to underground any overhead lines along with the road construction. We appreciate our continual involvement in the roadway and bridge improvements. These new 	 Road and Bridge Widening Project (Urban Systems Associates 2012). This report was included in the Draft EIR in Volume 2 of the Technical Reports. F-10 The opinions in this comment regarding the influence of roundabouts on drivers are acknowledged and are now part of the public record. The state of mind of drivers is not an environmental issue that can reasonably be addressed under CEQA. However, Section 3.3 of the Draft EIR provides a detailed visual analysis of the build alternatives, and this analysis methodology incorporates anticipated viewer perception of change. A simulation of the roundabout alternative from the intersection at El Camino Real and Via de la Valle is provided in Figure 3.3-17. Discussion on page 3.3-18 of the Draft EIR concludes that "Roundabouts are not common in the area and intersections are generally at right angles to each other. Though the proposed form would be different, it is not antagonistic to the free flowing shapes of local landforms, the San Dieguito River or the golf courses of the area Though a roundabout often contains more overall pavement surfaces, if these surfaces are punctuated by at least a moderate level of plantings, then aesthetic impacts would not occur." The issues raised in this comment have therefore been adequately addressed in the Draft EIR.
F-13 F-13 Sincerely, Carmel Valley Community Planning Board	F-11 Page 2-19 of the Draft EIR identifies the route on Del Mar Heights Road as "the preferred haul route expected to be followed by heavy equipment" but also notes that "If certain construction activities would make accessing El Camino Real from the south difficult, the area could be accessed from Interstate 5 (I-5) east on Via de la Valle to El Camino Real." Therefore, both routes have been identified in the Draft EIR.
Frisco White, AIA Chair	F-12 Future undergrounding projects are scheduled to occur in the area and consist of the UU994 Via de la Valle and UU588 El Camino Real projects and will be covered/analyzed in a separate environmental document being prepared by the Planning Department for the T&SW UUP program. The applicant department for the El Camino Real project (Public Works Department) is coordinating with

staff from the Transportation and Storm Water, Utilities Undergrounding Program to ensure that the design for the undergrounding of the overhead utilities can be incorporated into the El Camino Bridge project design. The Public Works Department will coordinate the installation of the underground utilities with the Transportation and Storm Water, Utilities Undergrounding Program within the project limits for the El Camino Real Bridge project so that construction would not have to occur twice in the same area. See also response to comment #18 in the JPA letter.

F-13 This comment is a closing statement. Because the comment does not raise any issues regarding the sufficiency of the EIR in identifying and analyzing impacts or avoidance and mitigation measures, no further response is required, per CEQA Guidelines Section 15204.





November 9, 2015 Page 2 As you may know, the City recently released a Request for Proposal ("RFP") seeking proposals for a lessee to manage activities, programs, and operations on the Property. Surf Cup responded to the RFP in October, proposing a 25-year lease of the Property to provide a wide variety of recreational opportunities to the community and region at the Property. This letter provides comments on the Draft Environmental Impact Report ("DEIR") for the proposed EI Camino Real Road Birdge Project ("Project") prepared by the City of San Diego. The Project involves road modifications to a segment of EI Camino Real that runs from Via de la Valle on the north to San Dieguito Road on the south. The Project proposes seven build alternatives. Noveer, two of the alternatives: the Central Alignment Alternative, the Western Alignment Alternative, the Eastern Alignment Alternative, and the Roundabout Alternative. While Surf Cup supports the Project's goal of improving the alignment of EI Camino Real, we believe the alternative chosen should be the one that minimizes impacts to the Property. To this end, Surf Cup strongly supports the Western Alignment and the Roundabout Alternative. Specifically, both the Eastern Alignment and the Central Alignment. An alignment that extends further east would require additional land on the Property to accommodate the roadway, which would significantly impact the future recreational opportunities on the Property. Based on our preliminary analysis, we estimate that the Eastern Alignment and the Roundabout Alternative would extend substantially farther east owould require additional land on the Property to accommodate the roadway, which would significantly impact the future recreational opportunities on the Property. Based on our preliminary analysis, we estimate that the Eastern Alignment and the Roundabout Alternative would as result in the loss of at least fur soccer fields, including one turf field open to the public, proposed in Surf Cup's RFP respon	 H-2 This comment explains that in October 2015, Surf Cup responded to a City RFP seeking proposals for activities on the Polo Club fields. Because the comment does not raise any issues regarding the sufficiency of the EIR in identifying and analyzing impacts or avoidance and mitigation measures, no further response is required, per CEQA Guidelines Section 15204. H-3 Specific responses to comments on the four alternatives identified in the comment are addressed below. H-4 The preferences and opposition of Surf Cup for the various alternatives are acknowledged and are now part of the public record. Because the comment does not raise any issues regarding the sufficiency of the EIR in identifying and analyzing impacts or avoidance and mitigation measures, no further response is required, per CEQA Guidelines Section 15204. H-5 Potential impacts to the Polo Club fields, an existing recreational property owned by the City, are discussed in detail in Section 3.1.3.7 of the Draft EIR. This section of the Draft EIR notes that "Clause 1.05b of the contract states that "CITY reserves the right to grant and use easements or establish and use rights-of-way over, under, along and across the leased premises for utilities, thoroughfares, or access as it deems advisable for the public good." Table 3.1-10 of the Draft EIR discloses the estimated intrusion of the various alternatives into the Polo Club field area, and estimates a width of 205 feet for the Eastern Alignment Alternative. The Draft EIR concludes that "existing and potential activities on the City's property would not be precluded in the future by any of the proposed alignments for EI Camino Real" and also notes that "To reduce impacts to the Polo Club fields, during final design of the selected alternative designers will coordinate restoration and replacement of affected facilities on the property with City of San Diego Real Estate Assets and the current lessee." Because it is not known what the City's choice will be for lessees of
¹ There is a fifth feasible development alternative in the DEIR, the Lower Elevation Alternative. However, it is not considered separately here and is not considered separately in most sections of the DEIR because it has the same configuration as the Central Alignment.	H-6 The Draft EIR thoroughly discusses and discloses the degree of impact of each alignment on existing land uses in Section 3.1. The opinions expressed in this comment regarding the various alternatives are acknowledged and are now part of the public record.



November 9, 2015 Page 3



This land is undevelopable land which could be used to provide recreational opportunities to the community and region. As such, we believe the Eastern Alignment and the Roundabout Alternative are inferior alternatives to the Western Alignment and the Central Alignment.

The Eastern Alignment is noted in the DEIR as the preferred and environmentally superior alternative. The following reasons are cited to classify the Eastern Alignment as the environmentally superior alternative:

- The Eastern Alignment and Roundabout Alternative have the best constructability and interfere the least with existing travel during construction because the bridge could be built in one stage and the bridge and road north of the bridge would be completely separate from existing El Camino Real.
- The Eastern Alignment and Roundabout Alternative have the shortest bridge construction duration and span the fewest bird breeding seasons.
- The Eastern Alignment is the only alternative that would provide a signalized intersection with adequate approach geometry to achieve improved intersection LOS in 2035 consisting of four lanes (a left, two through lanes, and a dedicated right) at Via de la Valle and El Camino Real.
- The Eastern Alignment would cause the least permanent impacts to USACE/RWQCB wetlands.
- The Eastern Alignment would cause the least impacts to coastal sage scrub.

We appreciate the City's intent to choose an alternative that would minimize construction impacts, specifically traffic and biological resources impacts. However, we

H-7 This comment summarizes the discussion of the environmentally superior alternative and is not at variance with the information in the Draft EIR. Because the comment does not raise any issues regarding the sufficiency of the EIR in identifying and analyzing impacts or avoidance and mitigation measures, no further response is required, per CEQA Guidelines Section 15204.

Potential impacts to the Polo Club fields, an existing recreational property owned by the City, are discussed in detail in Section 3.1.3.7 of the Draft EIR. Please also see the response to Surf Cup comment #5.

H-8

H-6

cont.

H-7

H-8

November 9, 2015 Page 4	H-9	The response of Surf Cup to the City's RFP does not constitute an adopted plan. Existing land uses on the Polo Club fields were adequately addressed in the Draft EIR. Because it is not known what the City's choice will be for lessees of the property in the future, it would be speculative to analyze proposals in the EIR in any greater detail than the analysis based on existing conditions presented in the Draft EIR. In accordance with CEQA Guidelines Section
believe temporary construction impacts are temporary, while reducing recreational opportunities at the Property would result in more meaningful, longer-term adverse impacts. The recreational opportunities proposed by Surf Cup would maximize benefits to the San Diego community generally and the youth in San Diego specifically when		15145, no further discussion is required. Please also see the response to Surf Cup comment #5.
compared to a roadway. The North City Future Urbanizing Area Framework Plan ("Framework Plan") encourages increasing open space, parks, and recreation opportunities. One objective	H-10	Existing land uses on the Polo Club fields are adequately addressed in the Draft EIR, which acknowledges and quantifies the impacts on Polo Club fields of the Eastern Alignment and Roundabout alternatives, as well as the other build
of the Framework Plan is to create a viable open space system that functions in a multi- faceted, multiple-use manner, and includes or provides for such features as habitat protection and preservation, wildlife and habitat restoration, and recreational	H-11	alternatives, in Sections 3.1 and 5.3.1. As summarized in Section 5.3.1 of the Draft EIR, the Eastern Alignment
maintain a variety of recreational amenities, maintain open space, and restore trails. Table 3.1-4 in the DEIR analyzes project consistency with the Framework Plan. However, it does not list the Framework Plan's goals of increasing parks and open space. The loss of four fields to accommodate the Eastern Alignment or the Roundabout Alternative would be inconsistent with the Framework Plan's goals and objectives, which should be adequately considered in the DEIR.		Alternative is the only alternative that would provide a signalized intersection with adequate approach geometry to achieve improved intersection LOS in 2035 consisting of four lanes (a left, two through lanes and a dedicated right) at Via de la Valle and El Camino Real (lining up with De la Valle Place). Therefore, future traffic level of service at this intersection would be the best with the Eastern Alignment Alternative among all of the build alternatives. Traffic
Moreover, while construction impacts would be reduced under the Eastern Alignment and Roundabout Alternative in the areas of biology and traffic, some impacts would presumably be increased under the Eastern Alignment and Roundabout Alternative because they both involve constructing a new road where there is not a road		volumes would be the same in the future for all alternatives at each of the intersections analyzed. The project would not generate traffic.
currently. In particular, recreational impacts would be increased under these alternatives due to the loss of open space on the Property.		Noise impacts of the various alternatives are addressed in detail in Section 3.11 of the Draft EIR, which explains that increases in noise levels under any of the
The signalized intersection at Via de la Valle and El Camino Real is also noted as one of the reasons the Eastern Alignment is superior. However, signalizing that intersection would presumably create increased traffic and noise impacts to the properties north of that intersection compared to the Western Alignment or Central Alignment.		build alternatives would be caused primarily by the change in height from raising El Camino Real and the intersection at Via de la Valle above the flood plain or a movement of the roadway closer to local receivers. As presented in Tables 3.11-8 through 3.11-11, noise levels in the 2035 future condition at residential receptors at Del la Valle Place would all be below 60 dBA
In addition to the discussion in the DEIR regarding the environmentally superior alternative, the DEIR notes that the City prefers the Eastern Alignment Alternative because it would maximize the alignment on City owned property. While the Eastern Alignment and the Roundabout Alternative would be located primarily on City-owned property, it is important to consider that the Property will be subject to a multi-year lease to a private entity pursuant to the RFP.		community noise equivalent level (CNEL) and the Eastern Alignment Alternative levels would be only 1 dBA CNEL greater than the Western Alignment Alternative. Noise level differences less than 3 dBA are not discernible to the human ear. The Draft EIR concludes that for all alternatives, projected traffic noise levels at the residential, recreational, and commercial
In conclusion, we support the Project but strongly prefer the Western Alignment to either the Eastern Alignment or the Roundabout Alternative. We prefer the Central Alignment to both the Eastern Alignment and the Roundabout Alternative. We respectfully ask that the City reconsider their preferred alternative. We also ask that the		receptors in the area would not exceed the City or County thresholds for noise/land use compatibility, and traffic noise impacts would be less than significant.
	H-12	The current RFP for this property and lease acknowledged and referenced the proposed project, and the Eastern Alignment and the area available for lease is fully disclosed. Please also see the response to Surf Cup comment #5.

 November 9, 2015

 Page 5

 City amend the DEIR to consider the impacts to recreation in their analysis of the environmentally superior alternative. At a minimum, the DEIR alternatives analysis should acknowledge that recreational impacts would be minimized under the Western Alignment and the Central Alignment.

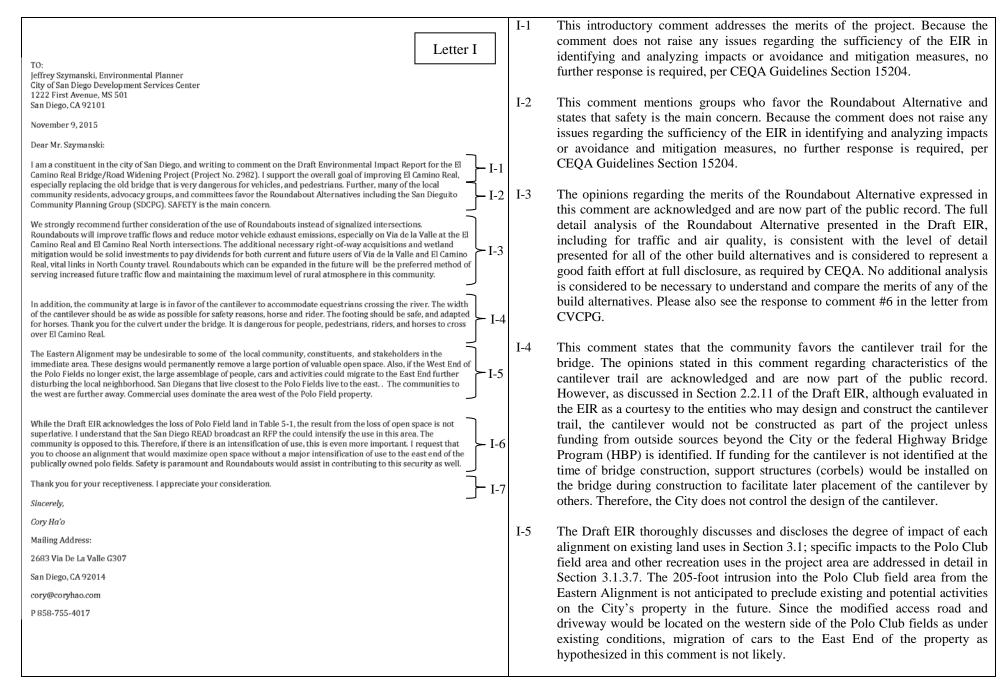
 We appreciate the opportunity to submit these comments on the DEIR and we look forward to continuing to work with the City to resolve these issues.

Very truly yours,

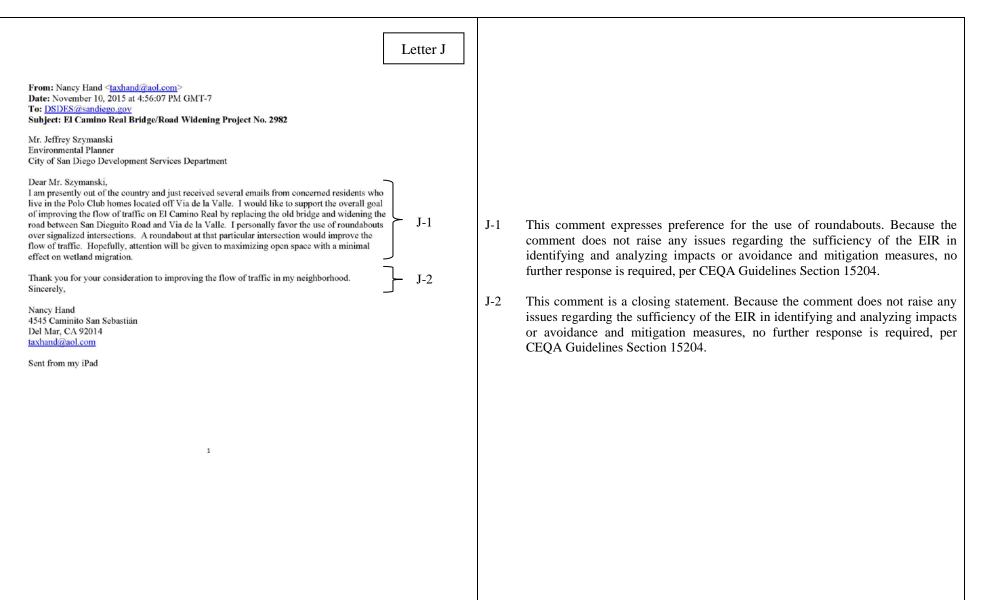
Robin Madaffer

- The preference for the Western Alignment Alternative or Central Alignment H-13 Alternative stated in this comment is acknowledged and is now part of the public record. Impacts to the Polo Club field area and other recreation uses in the project area are addressed in detail in Section 3.1 of the Draft EIR, which concludes that "the project would not cause long-term inconsistencies or conflicts with the recreational operations that would invalidate the adopted land use designation or cause environmental impacts. No significant impacts to recreational facilities would occur." The build alternatives are compared in Section 5.3.1 of the Draft EIR. Table 5-1 clearly identifies impacts to the Polo Club field property for each alternative, noting that the Western Alignment would have "Zero permanent intrusion along western edge of property" and the Eastern Alignment would have the "Most severe permanent intrusion along western side of property, except for Roundabout Alternative." This issue is considered to be adequately addressed in the Draft EIR without the need for changes.
- H-14 This comment is a closing statement. Because the comment does not raise any issues regarding the sufficiency of the EIR in identifying and analyzing impacts or avoidance and mitigation measures, no further response is required, per CEQA Guidelines Section 15204.

RESPONSE



I-5 (cont.) The Draft EIR concludes that "the project would not cause long-term inconsistencies or conflicts with the recreational operations that would invalidate the adopted land use designation or cause environmental impacts. No significant impacts to recreational facilities would occur." In addition, the build alternatives are compared in Section 5.3.1 of the Draft EIR. Table 5-1 clearly identifies impacts to the Polo Club field property for each alternative.
I-6 Potential impacts of each of the alternatives on the Polo Club field property are discussed in detail in Section 3.1.3.7 of the Draft EIR and summarized in Section 5. The opinions regarding open space expressed in this comment are acknowledged and are now part of the public record. Because the comment does not raise any issues regarding the sufficiency of the EIR in identifying and analyzing impacts or avoidance and mitigation measures, no further response is required, per CEQA Guidelines Section 15204.
I-7 This comment is a closing statement. Because the comment does not raise any issues regarding the sufficiency of the EIR in identifying and analyzing impacts or avoidance and mitigation measures, no further response is required, per CEQA Guidelines Section 15204.



EL CAMINO REAL BRIDGE/ROAD WIDENING PROJECT

RECIRCULATED DRAFT FINAL ENVIRONMENTAL IMPACT REPORT

Project Number 2982

SCH No. 1999071104

Prepared for

City of San Diego

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LIST OF ACRONYMS AND ABBREVIATIONS

°F	degrees Fahrenheit
$\mu G/M^3$	micrograms per cubic meter of air
AB	Assembly Bill
ADA	Americans with Disabilities Act
ADD	Assistant Deputy Director
ADT	average daily traffic
AEP	Association of Environmental Planners
AME	
	Archaeological Monitoring Exhibit
APE	Area of Potential Effect
APN	Assessor's Parcel Number
ASLA	American Society of Landscape Architects
BAU	business as usual
BI	Building Inspector
BMP	Best Management Practices
BSA	Biological Study Area
Dom	Diological Stady Thea
CAFE	Corporate Average Fuel Economy
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CAL-IPC	California Invasive Plant Council
California	California Register of Historic Places
Register	
Caltrans	California Department of Transportation District 11
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CCAP	Climate Change Action Plan
CCC	California Coastal Commission
CCP	Cities for Climate Protection
CD	construction document
CDFW	California Department of Fish and Wildlife
CDI W	(formerly California Department of Fish and Game)
CDP	Coastal Development Permit
	•
CE	Conservation Element
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CF4	tetrafluoromethane
cfs	cubic feet per second
CH4	methane
CHMIRS	California Hazardous Material Incident Report System
CIDH	Cast In Drilled Holes
CIP	cast in place
City	City of San Diego
CLOMAR	Conditional Letter of Map Revision
CM	Construction Manager
CMAP	Climate Mitigation and Adaptation Plan
CMLC	cement mortar lined and coated
CMU	Concrete Masonry Units
CNEL	community noise equivalent level

CO	carbon monoxide
CO2	carbon dioxide
CPAP	Climate Protection Action Plan
CPT	cone penetrometer test
CPTED	Crime Prevention Through Environmental Design
CSVR	Consultant Site Visit Record
CWA	Clean Water Act
cy	cubic yard
dB	decibel
d.g.	decomposed granite
DOT	U.S. Department of Transportation
DSD	Development Services Department
EA	Environmental Assessment
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
EMFAC	Emission Factors model
EO	Executive Order
ESL	Environmentally Sensitive Land
FEMA	Federal Emergency Management Agency
FESA	Federal Endangered Species Act
FHWA	Federal Highway Administration
FINDS	Facility Index System
FIRM	Flood Insurance Rate Map
FMMP	Farmland Mapping and Monitoring Program
FONSI	Finding of No Significant Impact
FPA	focused planning area
fps	feet per second
GHG	greenhouse gas
GIS	geographic information system
GWP	global warming potential
HBP	Highway Bridge Program
HBRR	Highway Bridge Replacement and Rehabilitation
HFC	hydrofluorocarbon
HMMD	Hazardous Materials Management Division Database
HRG	Historical Resources Guidelines
I-5	Interstate 5
I-15	Interstate 15
ICLEI	International Council for Local Environmental Initiatives
JPA	Joint Powers Authority
KVA	kilovolt amp
LCFS	Low Carbon Fuel Standard

LCP LDC LEDPA LEED LEV LOMR LOS	Local Coastal Program Land Development Code Least Environmentally Damaging Practicable Alternative Leadership in Energy and Environmental Design Low Emission Vehicle Letter of Map Revision Level of Service leaking Underground Storage Tank
LUST	leaking Underground Storage Tank
MBTA	Migratory Bird Treaty Act
MHPA	Multi-Habitat Planning Area
MLD	Most Likely Descendent
MMC	Mitigation Monitoring Coordinator
MMRP	Mitigation Monitoring and Reporting Program
MMTCO2E	million metric tons of carbon dioxide equivalent
mpg	miles per gallon
mph	miles per hour
MPO	Metropolitan Planning Organization
MRZ	Mineral Resource Zones
MS4	Municipal Separate Storm Sewer Systems
MSCP	Multiple Species Conservation Program
msl	mean sea level
MTCO2E	metric tons of carbon dioxide equivalent
N2O NAAQS NAHC National Regist NCFUA NEPA NES NHPA NPDES NMFS NO2 NOP NOX NPPA NRCS	North City Future Urbanizing Area National Environmental Policy Act Natural Environment Study National Historic Preservation Act National Pollutant Discharge Elimination System National Marine Fisheries Service nitrogen dioxide Notice of Preparation nitrogen oxide California Native Plant Protection Act Natural Resources Conservation Service
O3	ozone
OF	Open Space Floodplain
Pb	lead
PFC	perfluorocarbon
PI	Principal Investigator
PIF	Potential Impact Footprint
PM2.5	particulate matter less than 2.5 microns
PM10	particulate matter less than 10 microns
ppm	parts per million

PVC	polyvinyl chloride
RCB	reinforced concrete box
RCP	reinforced concrete pipe
RCRIS	Resource Conservation and Recovery Information System
RE	Recreation Element
RE	Resident Engineer
RECON	RECON Environmental, Inc.
ROG	reactive organic gas
RTIP	Regional Transportation Improvement Program
RTP	regional transportation plan
RWQCB	Regional Water Quality Control Board
SANDAG	San Diego Association of Governments
SDMC	San Diego Municipal Code
SB	Senate Bill
SCE	Southern California Edison
SCIC	South Coastal Information Center
SCP	Sustainable Community Program
SCS	Sustainable Communities Strategy
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDG&E	San Diego Gas & Electric
SDP	Site Development Permit
SF6	sulfur hexafluoride
SFHA	Special Flood Hazard Area
SFID	Santa Fe Irrigation District
SHPO	State Historic Preservation Office
SIP	state implementation plan
SO2	sulfur dioxide
SONGS	San Onofre Nuclear Generating Station
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TCM	Transportation Control Measure
Tierra	Tierra Environmental Services
TNM	Traffic Noise Model
UD	Urban Design Element
UNFCCC	United Nations Framework Convention on Climate Change
USACE	U.S. Army Corps of Engineers
U.S. EPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
VC	vitrified clay
VMT	vehicle miles traveled
VOC	volatile organic compound

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SECTION ES EXECUTIVE SUMMARY

ES.1 PROJECT DESCRIPTION

ES.1.1 Project Goals and Objectives (Purpose) and Need

The City of San Diego (City) proposes to modify the segment of El Camino Real between Via de la Valle and San Dieguito Road in order to improve the structural integrity of the vehicular bridge over the San Dieguito River, alleviate problems associated with high flood events, improve pedestrian and vehicular access to nearby coastal and recreational resources, relieve traffic congestion, and improve consistency with the adopted land use plan and adopted Circulation Element for the project area.

The project area is in the northwestern part of the City of San Diego. The City of Del Mar is to the west, the Fairbanks Ranch Country Club development within the City of San Diego is to the east, and County of San Diego lands are to the north. The road being modified is El Camino Real from Via de la Valle on the north to San Dieguito Road on the south. This portion of El Camino Real, classified as a two-lane collector, is approximately 2,400 feet long, 23 feet wide, has one travel lane in each direction, and has no shoulders, bike lanes, or pedestrian walkways. The road segment includes a bridge over the San Dieguito River that is 340 feet long and 27 feet wide. The San Dieguito River crosses under El Camino Real approximately 1,500 feet south of Via de la Valle.

In this location, El Camino Real would be inundated during a 100-year flood at several low points north of the river. Although the bridge surface would not be inundated, the 100-year flood level would rise to the bottom of the bridge deck, so there is not adequate room to allow debris to pass under the bridge. Also, the bridge is not structurally adequate for the local seismic conditions, because the piles are relatively shallow and buried in sediments that could fail in an earthquake due to liquefaction. In addition, this segment of El Camino Real is subject to severe congestion during peak travel times. The segment of El Camino Real included in the project currently operates at Level of Service (LOS) F at peak hours, reflecting congested traffic conditions. The proposed improvements include raising and widening El Camino Real roadway and replacing the bridge with a structure that is higher, wider, and has deeper piles.

Modifications to Via de la Valle from El Camino Real on the west to El Camino Real North on the east are also part of this project. This segment of Via de la Valle also operates at LOS F. Most of this segment would need to be widened for appropriate transitions from widened El Camino Real.

The goals and objectives (purposes) of the proposed project are the following:

- To provide structurally sound and operationally efficient access across the San Dieguito River during flood and non-flood events
- To provide congestion relief in order to improve traffic flow
- To obtain improved consistency with the adopted land use plans in the project area
- To improve pedestrian and vehicular access to nearby coastal and recreational resources

ES.1.2 Alternatives Analyzed in Detail in EIR

Seven build alternatives, one of which is preferred by the City of San Diego Public Works Department, which is the applicant department in the City, are analyzed at an equal level of detail in this recirculated Environmental Impact Report (EIR). This was done because federal funding was requested from and has been obligated by the Federal Highway Administration (FHWA) for improvements to the bridge through the Highway Bridge Replacement and Rehabilitation program (now the Highway Bridge Program, or HBP). Therefore, the National Environmental Policy Act (NEPA) must be satisfied as well as the California Environmental Quality Act (CEQA). FHWA is the lead agency under NEPA. The California Department of Transportation District 11 (Caltrans) is the local assistance liaison between the City and FHWA. A separate Environmental Assessment (EA) that meets the guidelines of FHWA and Caltrans is being prepared to satisfy NEPA. Multiple alternatives were analyzed in detail in this EIR to facilitate consistency with the separate EA.

Each alternative for modifying El Camino Real would have one of two basic cross section designs. Five of the alternatives would have a "full widened roadway" cross section, and two of the alternatives would have a "narrow roadway" cross section. The two different cross sections would provide different features within the road right-of-way in terms of number of vehicle travel lanes, bicycle lanes, center median, and pedestrian walkways and parkways. The full widened roadway cross section right-of-way for El Camino Real would be a total of 104 feet wide. Within the paved curb-to-curb width of 60 feet there would be a total of four 11-foot wide travel lanes (two in each direction), a 4-foot-wide central median, and a 6-foot wide bike lane on each side. Outside of the curbs there would be a 22-foot-wide parkway that includes a 5.5-foot pedestrian walkway on each side. The El Camino Real narrow roadway cross section right-of-way would be a total of 60 feet wide. Within the paved curb-to-curb width of 50 feet wide. Within the paved curb-to-curb width of 54 feet there would be either four travel lanes (two in each direction) with a 2-foot-wide striped median, or two travel lanes (one in each direction) and bike lanes on each side, with a 14-foot-wide median. Outside of the curbs there would be a 3-foot wide shoulder on each side.

The build alternatives represent different horizontal locations which were varied in relation to the existing alignment of El Camino Real to address different issues, as shown in Figure ES-1 and described below.

- Central Alignment Alternative: Full widened roadway cross section roughly centered on the existing alignment of El Camino Real to impact neighboring properties on the east and west sides relatively equally. For this alternative, the roadway would be raised above the 100-year flood level on embankment.
- Western Alignment Alternative: Full widened roadway cross section with an alignment shifted west to avoid impacts to the wetlands in the drainage ditch parallel to the eastern edge of El Camino Real. For this alternative, the roadway would be raised above the 100-year flood level on embankment.
- Eastern Alignment Alternative: Full widened roadway cross section with an alignment shifted east to allow independent construction of the new bridge, minimize impacts to developed properties along the western side of El Camino Real (Horsepark and Mary's Tack and Feed), and reduce impacts to wetlands in the drainage ditch parallel to the eastern edge of El Camino Real. The alignment for this alternative would be shifted eastward to where the toe of the new road western embankment would tie in along the

existing Polo Club fence. For this alternative, the roadway would be raised above the 100-year flood level on embankment.

- Roundabout Alternative: Full widened roadway cross section with an alignment shifted east similar to the Eastern Alignment Alternative. Roundabouts instead of signalized intersections would be located where El Camino Real meets San Dieguito Road, the Polo Field/Horsepark driveways, and De la Valle Place, and where Via de la Valle meets El Camino Real North. At the intersection of Via de la Valle and El Camino Real North, the project footprint would extend approximately 275 feet northward on El Camino Real North and approximately 500 feet eastward on Via de la Valle to allow appropriate transitions to the existing roadways. At the intersection of El Camino Real and San Dieguito Road, the project footprint would extend 350 feet southward on El Camino Real and 600 feet eastward on San Dieguito Road to allow appropriate transitions to those existing roadways.
- Lower Elevation Alternative: Full widened roadway cross section roughly centered on the existing alignment of El Camino Real to impact neighboring properties on the east and west sides relatively equally. The elevation (profile) of this alternative would be lower than for the other alternatives. For this alternative, the roadway would be raised above the 100-year flood level on embankment.

In addition to the alternative alignments, two build alternatives with a narrow right-of-way are also shown in Figure ES-1 and described below. Although these two alternatives are included in the detailed analysis of the EIR, they are not considered feasible by FHWA and, as discussed in Section 5, they would not be environmentally superior or be preferred by the City.

- Road Capacity Alternative: Narrow roadway cross section with an alignment shifted west to avoid impacts to the wetlands in the drainage ditch parallel to the eastern edge of El Camino Real. For this alternative, the roadway would be raised above the 100-year flood level on retaining walls to keep the road width as narrow as possible. This alternative would not provide pedestrian walkways, a parkway, bicycle lanes, or a usable central median.
- Bicycle Safety Alternative: Narrow roadway cross section with an alignment shifted west to avoid impacts to the wetlands in the drainage ditch parallel to the eastern edge of El Camino Real. For this alternative, the roadway would be raised above the 100-year flood level on retaining walls to keep the road width as narrow as possible. This alternative would not provide pedestrian walkways, a parkway, or additional travel lanes to increase road capacity.

All of the build alternatives analyzed in detail in this EIR would include a new bridge over the San Dieguito River that would be approximately the same length as the existing bridge, and raised above the 100-year flood level. All of the build alternatives would include removal of the existing bridge and a cantilever trail along the western edge of the new bridge. The cantilever would be a multi-use trail to accommodate equestrian users of the regional trails as well as pedestrians and bicyclists. Although evaluated in this recirculated EIR, the cantilever would not be constructed as part of the project unless funding from outside sources beyond the City or the federal HBP is identified. If funding for the cantilever is not identified at the time of bridge construction, support structures (corbels) would be installed on the bridge during construction to facilitate later placement of the cantilever by others. All of the build alternatives would involve steepening the embankments under the new bridge to have 1.5:1 side slopes.

All of the build alternatives analyzed in detail in this EIR would include widening Via de la Valle to its ultimate width from the modified intersection with El Camino Real eastward to El Camino Real North. The drainage channel along the south edge of Via de la Valle would be replaced with a buried storm drain sized to carry nuisance flow to the west. The existing storm drains under Via de la Valle at El Camino Real North would be replaced with a concrete box sized to pass a 100-year flow from upstream, estimated to be approximately 680 cubic feet per second.

Project impacts to wetlands due to any of the build alternatives would be mitigated by enhancement and creation of freshwater marsh and riparian vegetation on the San Dieguito River Park Joint Powers Authority (JPA) property west of the affected portion of El Camino Real (see Section 3.12). The one exception is the Roundabout Alternative, which would require additional acreage of wetland mitigation beyond the JPA Mitigation Site. Additional suitable mitigation opportunities exist on a site owned by the City within the project vicinity; therefore, additional off-site mitigation would be achievable for the Roundabout Alternative.

The No Build Alternative is also evaluated in this recirculated EIR. This alternative represents the circumstance under which the El Camino Real Bridge/Road Widening Project modifying the segment of El Camino Real from Via de la Valle to San Dieguito Road does not proceed.

It should be noted that the two alternatives with the "narrow roadway" cross section are not considered viable by FHWA, and would not be funded by the HBP. These are the Road Capacity Alternative and the Bicycle Safety Alternative. Caltrans/FHWA does not consider these alternatives viable because they do not provide all features needed to completely meet the purpose and need, including the purpose of providing congestion relief in order to improve traffic flow, and improving pedestrian and vehicular access to nearby coastal and recreational resources. However, as noted in CEQA Guidelines Section 15126.6(a), a range of reasonable alternatives which would "feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project" should be described in an EIR. The narrow roadway alternatives are analyzed in detail in this recirculated EIR in order to facilitate a complete evaluation of the comparative merits of the alternatives (see Section 5), including the two that have the narrowest right-of-way possible, for informed decision-making about the project. This detailed analysis is also anticipated to be helpful for various permitting agencies, including the California Coastal Commission. But if either of these alternatives were selected by the City, funding for the bridge independent of the proposed federal HBR funding would have to be obtained by the City. The federal funding is estimated to be approximately \$15 to \$20 million. In addition, the detailed comparison in Section 5 demonstrates that the narrow roadway alternatives would not be environmentally superior or be preferred by the City.

ES.1.3 History of Project Changes

Physical changes that have been made to the project in response to environmental concerns raised during the review of the project include the following:

- In September 2004, the concept of extensive river widening and bridge lengthening previously proposed was withdrawn as a project feature. This concept was determined to not be needed hydraulically to achieve no net rise in upstream 100-year water surface elevations, and was judged to potentially decrease long-term beach sand supply and potentially degrade clapper rail habitat upstream of the bridge.
- In Fall 2005, in response to suggestions made by the California Department of Fish and Wildlife (CDFW, formerly the California Department of Fish and Game) at the April 4,

2005 meeting, the City decided to retain the existing bridge for the Eastern Alignment Alternative, and consulted with the JPA to discuss the possibility of the bridge being vacated to this agency. The JPA decided they would consider accepting the bridge as a non-vehicular, multi-use trail facility (see letter dated April 17, 2006 in Appendix C). This option would not be possible for the other build alternatives, which would be constructed in the alignment of the existing bridge and roadway, and would require removal of the existing bridge.

- In September 2006, when the JPA reviewed the 2006 Draft EIR, they expressed reservations about accepting the existing bridge if the Eastern Alignment Alternative were selected. In a letter dated December 13, 2011 (Appendix C), the JPA notified the City that the JPA Board decided they could not take ownership and maintenance of the existing bridge if it remained in place after a new bridge is built. Therefore, this recirculated Draft EIR evaluates the Eastern Alignment Alternative with the existing bridge demolished, similar to the other alternatives.
- In response to task force recommendations, the full widened roadway cross section for most of the build alternatives was modified from a total right-of-way width of 122 feet as proposed in the 2006 EIR to be reduced to a total right-of-way width of 104 feet, as described in Section 2.2.2.1 of this recirculated EIR. The reduction was accomplished by decreasing the typical width of the median from 14 feet to 4 feet, bike lanes from 8 feet to standard 6 feet, and travel lanes from 12 feet to 11 feet. Likewise, the bridge cross section was reduced to be as described in Section 2.2.9.
- The Task Force examined information provided by City traffic engineers for roundabouts at the key intersections of Via de la Valle and El Camino Real, and San Dieguito Road and El Camino Real. Although the Task Force agreed that roundabouts at these intersections are not feasible, the City decided to add a Roundabout Alternative to the recirculated EIR with the alignment set in the same location as the Eastern Alignment in order to quantify impacts and traffic operational characteristics for comparison to other build alternatives. The Roundabout Alternative is addressed at an equal level of detail as the other build alternatives in this recirculated EIR.

On September 26, 2012, a meeting attended by U.S. Fish and Wildlife Service (USFWS), CDFW, San Diego Regional Water Quality Control Board (RWQCB), and the U.S. Army Corps of Engineers (USACE) was held to review and discuss to the alternatives and the proposed mitigation plan. In April 2014, San Diego Association of Governments (SANDAG) solicited the resource agencies, including CDFW, USFWS, USACE, RWQCB, and the California Coastal Commission, to allow for mitigation for impacts to existing, degraded wetland habitats used as mitigation for the North Coast Corridor project impacts at a 1:1 ratio as these habitats would be converted to higher value wetlands. In a series of emails, all resource agencies agreed. Mitigation for the El Camino Real Bridge/Road Widening Project on the JPA Mitigation Site is being conducted by SANDAG in association with the City of San Diego under a memorandum of agreement. Thus, the 1:1 mitigation ratio applies to the JPA Mitigation Site. Documentation of this communication is provided in Appendix C of this recirculated EIR.

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ES.2 IMPACTS DETERMINED TO BE SIGNIFICANT

ES.2.1 Environmental Process

In 2006, a Draft EIR was circulated for public review from July 25 to September 7. Twenty letters of comment were received by the City. The City conducted an extensive and lengthy outreach effort to the public and resource agencies for several years following close of the comment period. Based on that effort, changes were made to the alternatives (including reducing the width of the full widened roadway alternatives and adding roundabouts to the detailed discussion) and the proposed mitigation plan. The result is this recirculated EIR.

This is a Project EIR as defined by Section 15161 of the California Environmental Quality Act (CEQA) Guidelines, and will be certified by the City. The format and content of this EIR comply with CEQA guidance and issues raised during public scoping.

In general, the purpose of this document is to provide decision-makers and the public with information about the consequences of the proposed project and alternatives. Project-related consequences were determined by describing existing conditions, superimposing a given alternative on this setting, and then analyzing the effects that would occur if that project alternative were implemented. This process was conducted separately for each environmental issue examined, including land use, traffic/circulation, hydrology/water quality, and biological resources.

The City of San Diego will have to certify the EIR under CEQA in order to approve the proposed project for construction as Capital Improvement Project No. 52-479.0. The City also has other discretionary actions, including approval of a Coastal Development Permit for areas within City jurisdiction, and a Site Development Permit. The environmental review process will not be complete until FHWA signs a Finding of No Significant Impact (FONSI) for the separate EA. Until the FONSI is signed, the City cannot access federal funds for final design, right-of-way arrangements, or the construction bidding process. In addition, FHWA will not provide federal funding for an alternative that is not considered feasible under NEPA. As noted above, FHWA does not consider the Road Capacity or Bicycle Safety alternatives feasible under NEPA, and would not fund these two alternatives.

ES.2.2 Significant Impacts under CEQA

Based on the analysis of each of the seven build alternatives in Section 3, impacts determined to be significant are as follows:

Land Use

• Potential for indirect impacts to MHPA during construction.

Mitigation measures for indirect impacts to the MHPA are presented in detail in Section 3.1.5, consistent with the City's MHPA Land Use Adjacency Guidelines.

Traffic/Circulation

• Traffic hazards due to non-standard designs: Road Capacity and Bicycle Safety alternatives.

• Substantial restriction in access to publicly or privately owned land: Road Capacity Alternative.

There are no mitigation measures available to mitigate for these significant impacts, however, these impacts could be avoided by selecting another alternative for the project.

Visual/Aesthetics

- Degradation of visual character from the change of the character of the current bridge structure and removal of trees: All build alternatives.
- Blocking the view of a public resource (the westward view of the San Dieguito River) due to the fencing required along the cantilever trail on the west side of the new bridge: All build alternatives.
- Neighborhood character impacts from the retaining walls: Road Capacity and Bicycle Safety alternatives.
- Development features impacts from the retaining walls exceeding 6 feet in height: Road Capacity and Bicycle Safety alternatives.

Mitigation measures for visual/aesthetics impacts are presented in detail in Section 3.3.6. Measures proposed to mitigate for aesthetic impacts include incorporating a white wood-appearing railing into the project design, and revegetating trees removed. Mitigation for view blockage from the cantilever fencing would not be mitigable to below a level of significance under CEQA. Mitigation for retaining walls would involve use of colored and textured concrete or other alternating split face block with color, and landscaping.

Historical Resources

• Although no direct impacts were identified, mitigation measures are required for potentially significant impacts to possible buried resources for all alternatives.

Construction monitoring by a qualified archaeologist and a Native American is required to address potential impacts to buried historical resources in the alluvial deposits within the project area. The monitoring program to be conducted according to City guidelines is presented in detail in Section 3.4.5 and includes procedures and activities prior to the preconstruction meeting, at the preconstruction meeting, during construction, and post construction.

Hydrology/Water Quality

- Modification of drainage patterns due to substantial changes to stream flow velocities or quantities: All build alternatives.
- Construction impacts on water quality: All build alternatives.

Mitigation measures for hydrology/water quality impacts are presented in detail in Section 3.7.5. To mitigate for increasing 100-year velocities in the river, buried bank protection shall be provided along the currently unprotected northern bank of the river for 500 feet east of the new bridge. To mitigate construction impacts associated with water quality, a Storm Water Pollution

Prevention Plan (SWPPP) that includes all conditions that may have been added by the permitting agencies shall be incorporated into the construction plans and specifications.

Paleontological Resources

• Disturbance of a formation with the potential to contain fossils: All build alternatives.

Mitigation measures to minimize impacts to paleontological resources are presented in detail in Section 3.9.5 and include procedures and activities prior to the preconstruction meeting, at the preconstruction meeting, during construction, and post construction.

Biological Resources

- Sensitive species due to the potential to substantially affect an endangered, rare, or threatened species of animal or plant or the habitat of the species: All build alternatives.
- Impact wetlands or waters of the U.S.: All build alternatives.
- Potential for introduction of invasive plant species into a natural open space area: all build alternatives.

Mitigation measures for impacts to biological resources are presented in detail in Section 3.12.5. A conceptual plan for creation and enhancement of wetlands has been developed, and is proposed to be implemented on the JPA (former Boudreau) Mitigation Site west of the affected portion of El Camino Real.

Cumulative

Traffic/Circulation. The Road Capacity and Bicycle Safety alternatives would result in significant and unmitigable traffic/circulation impacts under CEQA for having non-standard design that would create additional hazards for pedestrians (both alternatives), create additional hazards for bicyclists (Road Capacity Alternative), and substantially restrict access to Mary's Tack and Feed, a privately owned business, and Horsepark and Polo Club, publicly owned properties (Road Capacity Alternative). These traffic impacts would be cumulatively significant, because the non-standard design features would exacerbate hazards for pedestrians and bicyclists and the lack of turn pockets for the Road Capacity Alternative would continue to restrict access as other cumulative development projects incrementally add traffic and multi-modal travelers to the area.

The long-term operation of the El Camino Real road segments for the Road Capacity and Bicycle Safety alternatives would be LOS F, which is no better than No Build LOS in 2035. Not improving the level of service is not a significant impact of the project. Therefore, these alternatives would not create a significant cumulative traffic impact under CEQA when combined with cumulative projects in the area.

For the Central Alignment, Western Alignment, and Lower Elevation alternatives, the long-term intersection operation at Via de la Valle and El Camino Real would be LOS F in the A.M. and P.M. peak. This long-term intersection LOS is the same as the No Build LOS, and the delay is not as long as for the No Build Alternative. Not improving the level of service is not a significant impact of the project. For the Central Alignment, Western Alignment, and Lower Elevation alternatives, the long-term intersection operation in 2035 could be improved above No Build LOS

F conditions by providing four lanes on the intersection approach for traffic movements (a left-turn, two through lanes, and a dedicated right-turn lane) for eastbound traffic on Via de la Valle on the west side of El Camino Real. However, that configuration is not being proposed for these alternatives because land use impacts would occur to Mary's Tack and Feed. Not improving the level of service is not a significant project impact; therefore, these alternatives would not create a significant cumulative traffic capacity impact under CEQA when combined with cumulative projects in the area.

The Eastern Alignment Alternative would have an improved intersection LOS at Via de la Valle and El Camino Real, because four lanes on the intersection approach for traffic movements (a left-turn, two through lanes, and a dedicated right-turn lane) for eastbound traffic on Via de la Valle on the west side of El Camino Real would be provided without impacting Mary's Tack and Feed. Long-term operation at the new intersection of El Camino Real and Via de la Valle/De la Valle Place for the Eastern Alignment would be LOS D in the A.M. and P.M. peak. Therefore, the Eastern Alignment would not create significant direct or cumulative traffic impacts under CEQA at this intersection.

The Roundabout Alternative would operate at unacceptable LOS E and F in the AM and PM peak, respectively, at El Camino Real and Via de la Valle in 2035. This long-term intersection LOS is no worse than the No Build LOS. Not improving the level of service is not a significant impact of the project. An expanded design for the Roundabout Alternative at El Camino Real and Via de la Valle would be needed to improve long-term 2035 operations at this location. The expanded design is designated in the roundabout study as the "ultimate" design for this roundabout and would add a second southbound lane and a northbound dual right-turn partial bypass, which would improve the operations of this roundabout to LOS A for A.M. and P.M. peaks. The City is not proposing the ultimate roundabout design for the Roundabout Alternative at this location in order to minimize the footprint of this alternative. Not improving the level of service is not a significant cumulative traffic impact; therefore, the Roundabout Alternative would not create a significant cumulative traffic impact under CEQA when combined with cumulative projects in the area. This long-term intersection LOS is no worse than the No Build LOS, which would be less than with the No Build Alternative.

For all build alternatives, the full width configuration would be constructed but full benefit could not be achieved at the intersection of Via de la Valle and El Camino Real North without widening of Via de la Valle for a transition for four lanes to two lanes east of El Camino Real North. Although the full width configuration would be constructed up to El Camino Real North, the striping for a full width intersection would not be provided because that would require construction of a transition that would extend beyond the project area and into County of San Diego jurisdiction. Not improving the level of service beyond No Build conditions is not a significant project impact; therefore, the build alternatives would not create a significant cumulative traffic impact under CEQA when combined with cumulative projects in the area.

Visual Quality. Blocking the view corridor and view of a public resource due to the cantilever fence on the west edge of the new bridges was determined to be unmitigable under CEQA. Therefore, this feature of all build alternatives would contribute to visual/aesthetics cumulative impacts.

ES.3 IMPACTS FOUND NOT TO BE SIGNIFICANT

CEQA Guidelines Section 15128 requires an EIR to contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. The recirculated EIR for El Camino Real Bridge/Road Widening Project did not dismiss any technical issue; all possible effects of the project were analyzed in detail in Section 3. After analysis presented in Section 3, impacts in the following issue areas were found to be not significant under CEQA for all of the build alternatives: Farmlands, Public Utilities/Services, Geology/Seismicity/Soils, Air Quality, Noise, and Greenhouse Gas Emissions. Refer to the sections in Section 3 that address these issues for the documentation of the conclusions regarding non-significance.

ES.4 PROJECT ALTERNATIVES

ES.4.1 Alternatives Studied in Detail

Seven design alternatives were developed by a multi-disciplinary team to substantially achieve the project purpose and need while avoiding or minimizing environmental impacts. Each of these alternatives represents "the project" for purposes of environmental analysis under CEQA, although some perform better and address more of the purpose and need than others, as discussed in Sections ES.4.3 and ES.4.4. These alternatives were summarized in Section ES.1.2 and are evaluated in detail in Section 3 of this recirculated EIR.

ES.4.2 Alternatives Considered but Rejected

Other alternatives were initially considered but then it was determined that they would not attain most of the basic objectives of the project, or that they would not avoid or substantially lessen any of the significant effects of the project, or that they were infeasible. The alternatives that were considered but rejected without detailed analysis in Section 3 of this recirculated EIR are summarized below and discussed briefly in Section 5 of this recirculated EIR. Alternatives considered but rejected are the following:

- Traffic Diversion Alternative: Route traffic on Via de la Valle and San Dieguito Road over a new bridge on El Apajo in Fairbanks Ranch, a two-lane road that currently terminates on either side of the San Dieguito River in Morgan Run Resort and Club. This alternative was rejected because it would create new impacts to the San Dieguito River in a different location, increase traffic and noise along narrow roadways, and generate inconsistencies with the North City Future Urbanizing Area (NCFUA) Framework Plan. This alternative also would not address most of the purposes of the proposed project.
- Alignment to El Camino Real North Alternative: Place a wider roadway and new bridge east of existing El Camino Real, to line up with El Camino Real North, located 1,200 feet east of the intersection with Via de la Valle. This alternative was rejected because it would have greater impacts to wetlands in the river providing clapper rail habitat than any of the build alternatives studied in detail.
- Bridge over 100-year Floodplain ("Viaduct") Alternative: Construct a very long bridge or "viaduct" that would span the entire 100-year floodplain in the study area, which is a length of approximately 2,500 feet. This alternative was rejected because it would cost more than approximately \$50 million, compared to approximately \$20 million for the proposed project, without substantially reducing impacts.

- River Channel Widening Alternative: Avoiding increases in upstream water surface elevations due to the embankment across the floodplain by excavating the existing San Dieguito River channel to be approximately 100 feet wider under the new bridge for approximately 800 feet upstream of the bridge, and excavating the existing river channel to be 100 to 300 feet wider for approximately 1,000 feet downstream of the bridge. The new bridge would be about 100 feet longer than the existing bridge. This alternative was rejected because it would generate additional wetlands impacts in the river and potentially change sedimentation patterns, reducing beach sand delivery downstream.
- Task Force Alternatives: In September 2006, a community task force was formed to discuss roadway widening alternatives other than those evaluated in the 2006 EIR. The work of the Western San Dieguito River Valley/NCFUA Subarea II Task Force was documented in their Final Recommendations report (Task Force Report) dated February 7, 2007. The Task Force studied a number of widening alternatives that they rejected in their own deliberations. The alternatives the Task Force considered but rejected are described in the Task Force Report and are similarly considered but rejected in Section 5 of this recirculated EIR.

ES.4.3 Environmentally Superior Alternative

Section 15126.6(e) of the CEQA Guidelines notes that if the environmentally superior alternative is the No Project Alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. The seven build alternatives evaluated in detail are compared in Section 5 to evaluate which alternative best minimizes the full range of potential impacts while still satisfying most or all of the project objectives.

Based on the comparison in Section 5 of this recirculated EIR, the Eastern Alignment Alternative is identified as the Environmentally Superior alternative. This alternative would have the shortest temporal impacts on sensitive wildlife, would minimize impacts to land uses currently developed with structures, and would generate the best long-term improvements in traffic conditions without encroaching on roadway in County jurisdiction. This alternative would also generate the least impacts to existing traffic conditions during construction. Among the full widened roadway alternatives deemed feasible by FHWA/Caltrans, the Eastern Alignment Alternative would generate the least acreage of permanent impacts to wetlands under the jurisdiction of the USACE and San Diego RWQCB.

ES.4.4 Rationale for Alternative Selection

As discussed in Section 2.3 of this recirculated EIR, the City has identified the Eastern Alignment Alternative as its Preferred Alternative. This alternative allows the bridge and the roadway for El Camino Real north of the bridge to be constructed completely free of the existing bridge and roadway. The Eastern Alignment Alternative therefore would avoid lengthy disruption of traffic during construction. Also, the bridge could be built in one phase, so would need fewer piers (two sets of three versus two sets of four for most of the other alternatives).

Construction of the bridge for the Eastern Alignment Alternative would affect the river for a shorter duration than most of the other alternatives. Bridge construction is anticipated to span three bird breeding seasons (when construction in the river would have to stop) for most of the alternatives, but would span only two bird breeding seasons for the Eastern Alignment Alternative because the bridge can be built in a single phase. Although the bridge for the

Roundabout Alternative would be the same and offer the same construction timing advantages, the Roundabout Alternative would impact the greatest acreage of wetlands of any of the alternatives. Therefore, it would be more difficult to obtain permits from federal, state, and regional resource agencies for the Roundabout Alternative than for the Eastern Alignment Alternative.

The City also prefers the Eastern Alignment Alternative because it would generate the least impacts to properties developed with structures (Horsepark and Mary's Tack and Feed along the west side of El Camino Real), maximizes the alignment on City owned property, and minimizes the alignment in environmental tier lands and the Coastal Zone.

The Eastern Alignment Alternative would generate intersection operation benefits by moving the major intersection of El Camino Real and Via de la Valle to the east, lining up with De la Valle Place on the north leg instead of a commercial driveway as under existing conditions. The Eastern Alignment Alternative would thus provide more regulated turn movements, and would place the intersection of El Camino Real and Via de la Valle in a location that is less constrained by existing buildings along the southern edge of Via de la Valle and by steep slopes along the northern edge. The Eastern Alignment Alternative also is the only alternative that would allow signalized full intersection improvements for eastbound Via de la Valle at El Camino Real, with approach lanes consisting of four lanes (a left turn, two through lanes, and a dedicated right turn from eastbound Via de la Valle to southbound El Camino Real), without affecting existing commercial properties south of Via de la Valle and west of El Camino Real. Therefore, the Eastern Alignment Alternative provides the most improvement in long-term traffic operations.

ES.5 AREAS OF CONTROVERSY

Based on meetings with individual stakeholders, the primary area of controversy with the project revolves around land impacted by the road widening. Owners/lessees of affected properties prefer the road alignment to be shifted away from their individual parcels. The primary unresolved issue with the permitting agencies is related to the presence of the light-footed clapper rail, a federally and state endangered bird species, in the San Dieguito River in the vicinity of El Camino Real bridge. Focused surveys for this species conducted in spring 2004 and 2005 identified the presence of this species in the vicinity of the existing bridge. Discussions with the USFWS and CDFW are continuing.

ES.6 SUMMARY OF CEQA SIGNIFICANCE

The significant CEQA impacts and mitigation measures for each issue analyzed in Section 3 are summarized in Table ES-1. Mitigation measures also are presented in detail in Section 6: Mitigation Monitoring and Reporting Program.

Table ES-1 **Summary of CEQA Significance**

LAND USE

Impact	Threshold	Central	Road Capacity	Bicycle Safety	Western	Eastern	Round- about	Lower Elevation	Mitigation Measures
Compatibility with Planning Documents	Inconsistency/ conflict that results in environmental impacts	NS	NS	NS	NS	NS	NS	NS	Only potential land use impacts related to the Multi-Habitat Planning Area (MHPA) on-site would be significant but mitigable under CEQA for this project. MHPA land use adjacency mitigation measures are necessary
Compatibility with Existing Land Uses and Future Projects	Inconsistency/ conflict that results in environmental impacts	NS	NS	NS	NS	NS	NS	NS	for each of the build alternatives, as the project is located within and/or adjacent to the MHPA. These measures are to be used in addition to the "Biological Resource Protection During Construction MMRP" and with the direct habitat impact and species specific mitigation requirements specified in Section 3.12 of this recirculated EIR. Lan-1: As specified in the mitigation measures in Section 3.1, prior to issuance of any construction permit or notice to proceed, DSD/ LDR, and/or MSCP staff shall verify the Applicant has accurately represented the project's design in or on the Construction Documents (CD's/CD's consist of Construction Plan Sets for Private Projects and Contract Specifications for Public Projects) are in conformance with the associated discretionary permit conditions and Exhibit "A," and also the City's Multi-Species Conservation Program (MSCP) Multi-Habitat Planning Area (MHPA) Land Use Adjacency
Conflict with Environmental Plans or Policies	Inconsistency/ conflict that results in environmental impacts	NS	NS	NS	NS	NS	NS	NS	
Conflicts with ESL Regulations	Conflict with the provisions, including no net loss of wetlands and no increase in the base flood elevation	NS	NS	NS	NS	NS	NS	NS	
Effects on existing and planned recreational facilities	Inconsistency/ conflict that results in environmental impacts	NS	NS	NS	NS	NS	NS	NS	

NS = Not significant

SM = Significant and mitigable to below a level of significance <math>SU = Significant and unmitigable

Impact	Threshold	Central	Road Capacity	Bicycle Safety	Western	Eastern	Round- about	Lower Elevation	Mitigation Measures
Consistency with MSCP	Inconsistency/ conflict with adopted environmental plans for the area that results in environmental impacts	SM	SM	SM	SM	SM	SM	SM	Guidelines. The applicant shall provide an implementing plan and include references on/in CD's of the following: A. Grading/Land Development/MHPA Boundaries B. Drainage C. Toxics/Project Staging Areas/Equipment Storage D. Lighting E. Barriers F. Invasives G. Noise

NS = Not significant

SM = Significant and mitigable to below a level of significance <math>SU = Significant and unmitigable

Impact	Threshold	Central	Road Capacity	Bicycle Safety	Western	Eastern	Round- about	Lower Elevation	Mitigation Measures
Level of Service (LOS) during construction	Worsening of short-term LOS above acceptable limits	NS	NS	NS	NS	NS	NS	NS	There are no measures available to mitigate for the significant impacts on hazards for the Road Capacity and Bicycle Safety alternatives. There are no measures available to mitigate for the significant impacts on access to properties along El Camino Real caused by the Road Capacity Alternative. These impacts could be avoided by selecting another alternative for the project.
Level of Service (LOS)	Worsening of long-term LOS above acceptable limits	NS	NS	NS	NS	NS	NS	NS	
Traffic hazards	Increase in hazards due to non-standard design features	NS	SU	SU	NS	NS	NS	NS	
Consistency with General Plan and/or community plan	Inconsistency would cause the roadway to not properly align with other existing or planned roadways	NS	NS	NS	NS	NS	NS	NS	
Access	Substantial restriction in access	NS	SU	NS	NS	NS	NS	NS	
Parking	Substantial reduction in available parking	NS	NS	NS	NS	NS	NS	NS	

VISUAL/AESTHETICS

Impact	Threshold	Central	Road Capacity	Bicycle Safety	Western	Eastern	Round- about	Lower Elevation	Mitigation Measures
Aesthetics (Measures Vis-1 through Vis-4)	Degradation of visual character	SM	SM	SM	SM	SM	SM	SM	Vis-1: To mitigate impacts associated with Aesthetics issue 1a (change resulting from the removal of the vegetation that constitutes a visual resource), this study has assumed that a revegetation plan will be part of a formal mitigation measure
Views	Blocking a view corridor or view of a public resource	SU	SU	SU	SU	SU	SU	SU	related mostly to biological impacts and mitigations. To assure that Aesthetic Issue 1a, Changes to the Quality of Current Scenic Resources, is addressed, the following requirements must be met: prior to bid opening/bid award, the Public Works Department shall submit a landscape plan to be verified as reviewed and approved by the LDR-Landscape and/or Assistant Deputy Director (ADD) Environmental designee prior to being incorporated into the plans and specifications. This program would require the preparation of a revegetation plan prepared by a landscape architect. The revegetation plan for the river vegetation disturbed by construction shall be conducted as addressed in Section 3.12.5. Vis-2 : To mitigate impacts associated with Aesthetics issue 1c(1) (change resulting from the change in the character of the bridge and the change in scale associated with the heightened nature of the bridge and its abutments), prior to bid opening/bid award, the Public Works Department and LDR- Landscape or ADD shall verify that the bridge railing system was designed to integrate the concrete barrier requirements of a K-rail with those
Neighborhood Character (Measure Vis-4)	Bulk and height, stark contrast	NS	SM	SM	NS	NS	NS	NS	
Development Feature (Measure Vis-4)	Include walls above 6 feet	NS	SM	SM	NS	NS	NS	NS	
Light and Glare	Visible increase of 30% in reflectivity	NS	NS	NS	NS	NS	NS	NS	

NS = Not significant

SM = Significant and mitigable to below a level of significance <math>SU = Significant and unmitigable

Impact	Threshold	Central	Road Capacity	Bicycle Safety	Western	Eastern	Round- about	Lower Elevation	Mitigation Measures
			Capacity	Salety					 commonly associated with a wood rail barrier. The barrier shall include a steel backed wood-appearing faced railing barrier. The railing shall have a dominant horizontal look and be painted white to match the existing rails. These treatments shall be extended down the roadway and substitute standard steel barriers with wood-appearing rail barriers. This mitigation measure applies to all build alternatives. An Optional Type ST-40 railing approved by Caltrans would be more consistent with the existing rural character and would allow for higher visibility through the railing, especially as seen from the roadway. Vis-3: To mitigate impacts associated with Aesthetics issue 1c(3) (change resulting from the removal of visual resources that make up the current visual character of an important public view, specifically the Polo Fields as seen from the existing and proposed bridge), prior to bid opening/bid award, the Public Works Department shall submit to LDR-Landscape and ADD for review and approval a landscape plan that has been incorporated into the plans and specifications. This program would require the preparation of a revegetation plan prepared by a landscape architect, as described in Section 3.3.6. This mitigation measure applies to the Central Alignment, Eastern Alignment, Roundabout, and Lower Elevation alternatives.

Impact	Threshold	Central	Road Capacity	Bicycle Safety	Western	Eastern	Round- about	Lower Elevation	Mitigation Measures
									Vis-4 : To mitigate impacts associated with Aesthetics issue 1c(4), Neighborhood Character issue 3a, and Development Features issue 4c (impacts associated with large-scale walls associated with the Road Capacity and Bicycle Safety alternatives), prior to bid opening/bid award, the Public Works Department shall submit to LDR-Environmental, LDR-Landscape, and ADD plans that incorporate the use of colored and textured concrete or alternating split face block with integral color for the retaining wall, depending on the material selected for the wall construction. In addition, prior to bid opening/bid award, the Public Works Department shall submit to LDR-Landscape and ADD a landscape plan prepared by a Landscape Architect that includes the use of vegetation placed in front of the wall, consisting of approved City trees and shrubs.

HISTORICAL RESOURCES

Impact	Threshold	Central	Road Capacity	Bicycle Safety	Western	Eastern	Round- about	Lower Elevation	Mitigation Measures
Prehistoric Sites	Eligibility criteria in Section 3.4.4	SM	SM	SM	SM	SM	SM	SM	His-1 : Although no cultural resources identified within the Area of Potential Effect (APE) are considered significant, construction monitoring by a qualified archaeologist and a Native American is required to address potential impacts to buried resources in the alluvial deposits within the project area. The monitoring program shall be conducted according to City guidelines as specified in the mitigation measures in Section 3.4: Prior to Permit Issuance
Historic Site	Criteria in Section 3.4.4 including age, location, context, association, uniqueness, and integrity	NS	NS	NS	NS	NS	NS	NS	
Native American Values	Site with ethnic significance per the criteria in Section 3.4.4	SM	SM	SM	SM	SM	SM	SM	 Prior to Start of Construction During Construction Discovery of Human Remains Night and/or Weekend Work Post Construction These measures apply to all build alternatives. Implementation of the above measures would mitigate all CEQA impacts to below a level of significance.

Impact	Threshold	Central	Road Capacity	Bicycle Safety	Western	Eastern	Round- about	Lower Elevation	Mitigation Measures
Impacts to Farmland	Impacts to substantial Farmland as defined above	NS	NS	NS	NS	NS	NS	NS	No impacts would be significant under CEQA for any farmland issue. No mitigation measures are necessary for any of the build
Zoning or Williamson Act contracts	Conflict with agricultural use zoning or Williamson Act Contract	NS	NS	NS	NS	NS	NS	NS	alternatives.
Conversion of Farmland	Conversion of Farmland as defined above to non- agricultural use	NS	NS	NS	NS	NS	NS	NS	

FARMLANDS/AGRICULTURAL LANDS

NS = Not significant

SM = Significant and mitigable to below a level of significance

SU = Significant and unmitigable

PUBLIC UTILITIES/SERVICES

Impact	Threshold	Central	Road Capacity	Bicycle Safety	Western	Eastern	Round- about	Lower Elevation	Mitigation Measures
Impacts from utility relocation	Land use compatibility; adverse environmental impacts, excessive use of fuel, energy, power, or water; installation of non-drought tolerant landscaping.	NS	NS	NS	NS	NS	NS	NS	No impacts would be significant under CEQA. No mitigation measures are necessary for any of the build alternatives.

HYDROLOGY/WATER QUALITY

Impact	Threshold	Central	Road Capacity	Bicycle Safety	Western	Eastern	Round- about	Lower Elevation	Mitigation Measures
Increased flooding	Imposition of flood hazards on other properties, or develop within the 100-year floodplain	NS	NS	NS	NS	NS	NS	NS	Hyd-1 The following measure will be incorporated into the project plans and specifications to mitigate impacts associated with the increase of 100-year velocities in the river to above erosional levels. Prior to bid opening/bid award, the Transportation and Drainage Division shall verify that plans to provide <u>buried</u> bank protection along the northern bank of the river for 500 feet east of the new bridge have been incorporated. The
Groundwater quantity	Cause a net deficit in the aquifer volume or reduction in local groundwater table.	NS	NS	NS	NS	NS	NS	NS	bank protection shall be designed in accordance with the following concept to prevent impacts to wetlands in the river: place a temporary construction fence/environmental fence at the point of the slope where the habitat line ends. On the upstream side, remove the slope, creating a notch that is back
Uncontrolled Runoff	Generation of erosion and sedimentation downstream	NS	NS	NS	NS	NS	NS	NS	cut from the environmental fence to the desired elevation. Fill in and rebuild the slope, with buried riprap and/or matting, up to the necessary height. The construction zone
Modification of drainage patterns	Decline in vegetation	NS	NS	NS	NS	NS	NS	NS	would be from the trail edge on top down to the environmental habitat limit lower on the slope.The slope would be refilled and re-contoured and revegetated with native coastal sage scrub plant materials.

Impact	Threshold	Central	Road Capacity	Bicycle Safety	Western	Eastern	Round- about	Lower Elevation	Mitigation Measures
Modification of drainage patterns (Measure Hyd- 1)	Substantial changes to stream-flow velocities or quantities	SM	SM	SM	SM	SM	SM	SM	Hyd-2 To mitigate construction impacts associated with water quality, prior to bid opening/bid award, City staff shall verify that a SWPPP is incorporated into the construction
Modification of drainage patterns	Adverse impacts downstream	NS	NS	NS	NS	NS	NS	NS	specifications and plans, and that the SWPPP includes all conditions that may have been added by the permitting agencies to protect the endangered clapper rail upstream of the
Construction impacts on water quality (Measure Hyd- 2	Compliance with Water Quality Standards	SM	SM	SM	SM	SM	SM	SM	bridge. The SWPPP shall identify all construction Best Management Practice (BMP) requirements required by the City of San Diego Storm Water Standards, January 14, 2011, in accordance with SWRCB NPDES General Permit for Storm Water
Permanent impacts on water quality	Compliance with Water Quality Standards	NS	NS	NS	NS	NS	NS	NS	Discharges Associated with Construction and Land Disturbance Activities Order No. 2009- 0009-DWQ NPDES No. CAS000002 (adopted September 2, 2009) and/or the most recent update. Both erosion and sediment control BMPs shall be installed and maintained in addition to good housekeeping and site and materials management.

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Impact	Threshold	Central	Road	Bicycle	Western	Eastern	Round-	Lower	Mitigation Measures
			Capacity	Safety			about	Elevation	Copies of the SWPPP shall be retained at the construction site and at City offices. Examples of Construction BMPs that may be included in the SWPPP are as follows: -BMPs for physical and vegetation stabilization, such as geotextiles, mats, fiber blankets, hydraulic mulch, Bonded Fiber Matrix, and sprayed-on binders. -BMPs for sediment control such as silt fencing, gravel bag barriers, and fiber rolls. -BMPs for prevention of off-site sediment tracking, such as stabilized construction entrances/exits, corrugated steel panels, and dust control. -BMPs for materials management, such as protecting stockpiles from wind and rain, covering and/or providing secondary containment of storage areas, and specifying precautions for materials handling. Implementation of the above measures would mitigate all CEQA impacts to below a level of
									significance.

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GEOLOGY/SEISMICITY/SOILS

Impact	Threshold	Central	Road Capacity	Bicycle Safety	Western	Eastern	Round- about	Lower Elevation	Mitigation Measures
Ground Acceleration/ Shaking, Liquefaction, Soil Corrosion, Erosion, Contamination	Damage is possible to project components, but measures to preclude adverse impacts are not incorporated into the project	NS	NS	NS	NS	NS	NS	NS	No impacts would be significant under CEQA for any geology/seismicity/soils issue. No mitigation measures are necessary for any of the build alternatives.

PALEONTOLOGICAL RESOURCES

Impact	Threshold	Central	Road Capacity	Bicycle Safety	Western	Eastern	Round- about	Lower Elevation	Mitigation Measures
Fossils	Disturbance of a formation with the potential to contain fossils	SM	SM	SM	SM	SM	SM	SM	 Pal-1: To minimize the impacts associated with the disturbance of a formation with the potential to contain fossils, a monitoring program shall be conducted according to City guidelines as specified in the mitigation measures in Section 3.9: Prior to Permit Issuance Prior to Start of Construction During Construction Night and/or Weekend Work Post Construction Implementation of the above measures would mitigate all CEQA impacts to below a level of significance.

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Impact	Threshold	Central	Road Capacity	Bicycle Safety	Western	Eastern	Round- about	Lower Elevation	Mitigation Measures
Construction emissions	Conflict with air quality plan, violate air quality standards, increase criteria pollutants, expose sensitive receptors to substantial pollutant con- centrations, create objectionable odors, release air contaminants.	NS	NS	NS	NS	NS	NS	NS	No impacts would be significant under CEQA for construction or operational air quality issues. No mitigation measures are necessary for any of the build alternatives for construction or operational impacts.
Operations emissions	Conflict with SIP or RAQS, plus other thresholds above	NS	NS	NS	NS	NS	NS	NS	

HOIDE		1	1		1	1		1	
Impact	Threshold	Central	Road	Bicycle	Western	Eastern	Round-	Lower	Mitigation Measures
1			Capacity	Safety			about	Elevation	
Long-term Operation	Exceeds City or County thresholds	NS	NS	NS	NS	NS	NS	NS	No impacts would be significant under CEQA for any noise issue. No mitigation measures are necessary for any of the build alternatives.
Short-term Construction	Exceeds 75 dBA Leq at sensitive receptors	NS	NS	NS	NS	NS	NS	NS	

NOISE

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BIOLOGICAL RESOURCES

Impact	Threshold	Central	Road Capacity	Bicycle Safety	Western	Eastern	Round- about	Lower Elevation	Mitigation Measures
Sensitive Species	Substantial adverse impact on sensitive species or their habitats	SM	SM	SM	SM	SM	SM	SM	Detailed mitigation measures for impacts to vegetation communities, sensitive plant species, sensitive wildlife species, and from invasive species are presented in Section 3.12.5 of this recirculated EIR and summarized below.
Tier Habitats (Tier II)	Substantial adverse impact	SM	SM	SM	SM	SM	SM	SM	Mitigation for Vegetation Communities
Wetlands and Waters of the U.S.	Impact wetlands or waters of the U.S.	SM	SM	SM	SM	SM	SM	SM	Bio-1 : Wetland Habitat Mitigation Measures. Mitigation for unavoidable impacts to sensitive wetland habitats would be accomplished by: (1) creating habitat of equal value in the vicinity of the
Wildlife Movement	Interfere substantially with wildlife movement	NS	NS	NS	NS	NS	NS	NS	project and (2) enhancing degraded wetland habitats in the project vicinity through the removal of exotic plant species. Implementation of a wetland creation/enhancement plan on the JPA Mitigation Site is the principal proposed mitigation for impacts to
Habitat conservation plans	Conflict with provisions	NS	NS	NS	NS	NS	NS	NS	vegetation communities, including wetland habitats. The conceptual restoration plan is fully described in Appendix K of the NES (Conceptual Mitigation Plan ["restoration plan"] for the El Camino Real Bridge/Road Widening Project dated April 2015). Prior to the start of road or bridge construction, a final restoration plan is required to be prepared 127-acre
MHPA edge effects	Introduction of a land use that would result in adverse edge effects	NS	NS	NS	NS	NS	NS	NS	San Dieguito Lagoon W19 Restoration Project currently being developed by the San Diego Association of Governments (SANDAG), which includes the JPA site.

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Impact	Threshold	Central	Road Capacity	Bicycle Safety	Western	Eastern	Round- about	Lower Elevation	Mitigation Measures
Local policies or ordinances	Conflict with provisions protecting biological resources	NS	NS	NS	NS	NS	NS	NS	The final restoration plan would include elements described in the conceptual restoration plan. Restoration of the JPA site includes approximately 20.4 ac of wetland habitat enhancement and creation, including enhancement of a 2.0 ac parcel of existing mule-fat scrub/southern willow scrub habitat located in the San Dieguito River; creation of 3.0 ac of mule-fat scrub/southern willow scrub habitat in an area currently consisting of disturbed Diegan Coastal Sage Scrub- Baccharis dominated, tamarisk scrub, and disturbed habitat located south of the enhancement area; and creation of approximately 15.4 ac of freshwater marsh habitat, 12.5 ac of which would be
Invasive species	Introduction of invasive plant species into a natural open space area	SM	SM	SM	SM	SM	SM	SM	protected by an earthen berm and weir. The freshwater marsh creation area currently consists primarily of disturbed Diegan Coastal Sage Scrub- Baccharis dominated, disturbed habitat, and small areas of alkali marsh and disturbed wetland. Specific requirements for each alternative are summarized in Section 3.12.5.1 and the MMRP. The Roundabout Alternative would require additional acreage of wetland mitigation beyond the JPA Mitigation Site. Additional suitable mitigation opportunities exist within the project vicinity; therefore, additional off-site mitigation would be achievable for the Roundabout Alternative on a site owned by the City.

Impact	Threshold	Central	Road Capacity	Bicycle Safety	Western	Eastern	Round- about	Lower Elevation	Mitigation Measures
Biological Resources continued									 Bio-2: Upland Habitat Mitigation Measures. Impacts to sensitive upland habitats, including acreage of disturbed Diegan coastal sage scrub associated with road and bridge improvement and 14.33 ac disturbed Diegan coastal sage scrub habitats associated with the JPA Mitigation Site, would be mitigated through purchase of credits from the City's Cornerstone Lands. Implementation of this measure will require concurrence from the Wildlife Agencies per conditions of the Cornerstone Banking Agreement. Bio-3: Additional Vegetation Communities Mitigation Measures. The project footprint would be demarcated prior to construction in order to avoid encroachment into surrounding sensitive areas. Furthermore, a qualified biologist would monitor construction activities for the duration of the project to ensure that practicable measures are being employed to avoid incidental disturbance of habitat outside of the project footprint. Mitigation for Sensitive Plant Species Bio-4: General Measures. Prior to removal of vegetation, orange snow fencing would be installed to demarcate the project footprint in order to avoid encroachment into surrounding sensitive areas.

Impact	Threshold	Central	Road	Bicycle	Western	Eastern	Round-	Lower	Mitigation Measures
			Capacity	Safety			about	Elevation	
									Furthermore, a qualified biologist would monitor construction activities for the duration of the project to ensure that practicable measures are being employed to avoid incidental disturbance of special-status species outside of the project footprint. Measures for specific sensitive plant species are summarized below.
									Bio-5 : Palmer's Sagewort. Palmer's sagewort would be included in the plant palette used in the creation and enhancement of southern willow scrub/mule-fat scrub in the JPA Mitigation Site.
Biological Resources continued									Bio-6 : San Diego Sunflower. Habitat-based mitigation would be provided for impacts to disturbed Diegan coastal sage scrub, the vegetation community on site in which the San Diego sunflower is found, at a 1:1 ratio.
									Bio-7: Within the JPA Mitigation Site, San Diego marsh-elder occurring within areas to be enhanced would be flagged or fenced to ensure that these individuals are not removed by work crews and are instead incorporated into the enhancement areas. San Diego marsh-elder would be included in the plant palette used in the creation and enhancement of southern willow scrub/mulefat scrub in the JPA Mitigation Site. Final success criteria for the JPA Mitigation Site will require the presence of San Diego marsh-elder prior to final site signoff.

Impact	Threshold	Central	Road Capacity	Bicycle Safety	Western	Eastern	Round- about	Lower Elevation	Mitigation Measures
Biological Resources continued									Bio-8 : Within the JPA Mitigation Site, southwestern spiny rush occurring within areas to be enhanced would be flagged or fenced to ensure that these individuals are not removed by work crews and are instead incorporated into the enhancement areas. Southwestern spiny rush would be included in the plant palette used in the creation of coastal freshwater marsh in the JPA Mitigation Site. Final success criteria for the JPA Mitigation Site will require the presence of southwestern spiny rush prior to final site signoff. Furthermore, habitat-based mitigation would be offered for impacts to coastal freshwater marsh and mulefat scrub supporting southwestern spiny rush. Mitigation for Sensitive Wildlife Species Bio-9: General Mitigation Measures. Habitat-based mitigation would occur at mitigation ratios established by the City in the Biology Guidelines (City of San Diego 2002), including 4:1 for Clark's marsh wren habitat, 3:1 for yellow-breasted chat habitat, 4:1 for light- footed clapper rail habitat, and 3:1 for least Bell's vireo habitat. On the JPA Mitigation Site, habitat- based mitigation for species that occupy upland habitats, such as white-tailed kite, would be accomplished at a 2:1 ratio through purchase of credits from the City's Cornerstone Lands. Habitat-based mitigation for species that occupy disturbed, isolated wetland habitats on the JPA Mitigation Site would be provided through conversion to higher quality wetlands at a 1:1 ratio.

Impact	Threshold	Central	Road Capacity	Bicycle Safety	Western	Eastern	Round- about	Lower Elevation	Mitigation Measures
									 In order to avoid direct impacts to nesting birds, removal of vegetation would occur outside of the breeding season for birds. If vegetation removal is to occur from January to February 1, a preconstruction nesting bird survey for raptors and other early nesting species would be conducted. Bio-10: Least Bell's Vireo Mitigation Measures. Habitat-based mitigation would be provided to compensate for impacts to occupied least Bell's vireo habitat.
Biological Resources continued									Bio-11 : Clapper Rail Mitigation Measures. Habitat- based mitigation would be provided for the loss of suitable/occupied light-footed clapper rail habitat. In order to further avoid and minimize impacts to light- footed clapper rail general and specific measures detailed in Section 3.12.5.3 and the MMRP would be implemented.
									Mitigation for Invasive Species
									Bio-12 : Invasive Species Mitigation Measures. To ensure the project does not promote the introduction of invasive species to the surrounding undeveloped areas, construction equipment would be cleaned of mud or other debris that may contain invasive plants and/or seeds and would be inspected to reduce the potential of spreading noxious weeds before mobilizing to the site and before leaving the site, during the course of construction.

NS = Not significant

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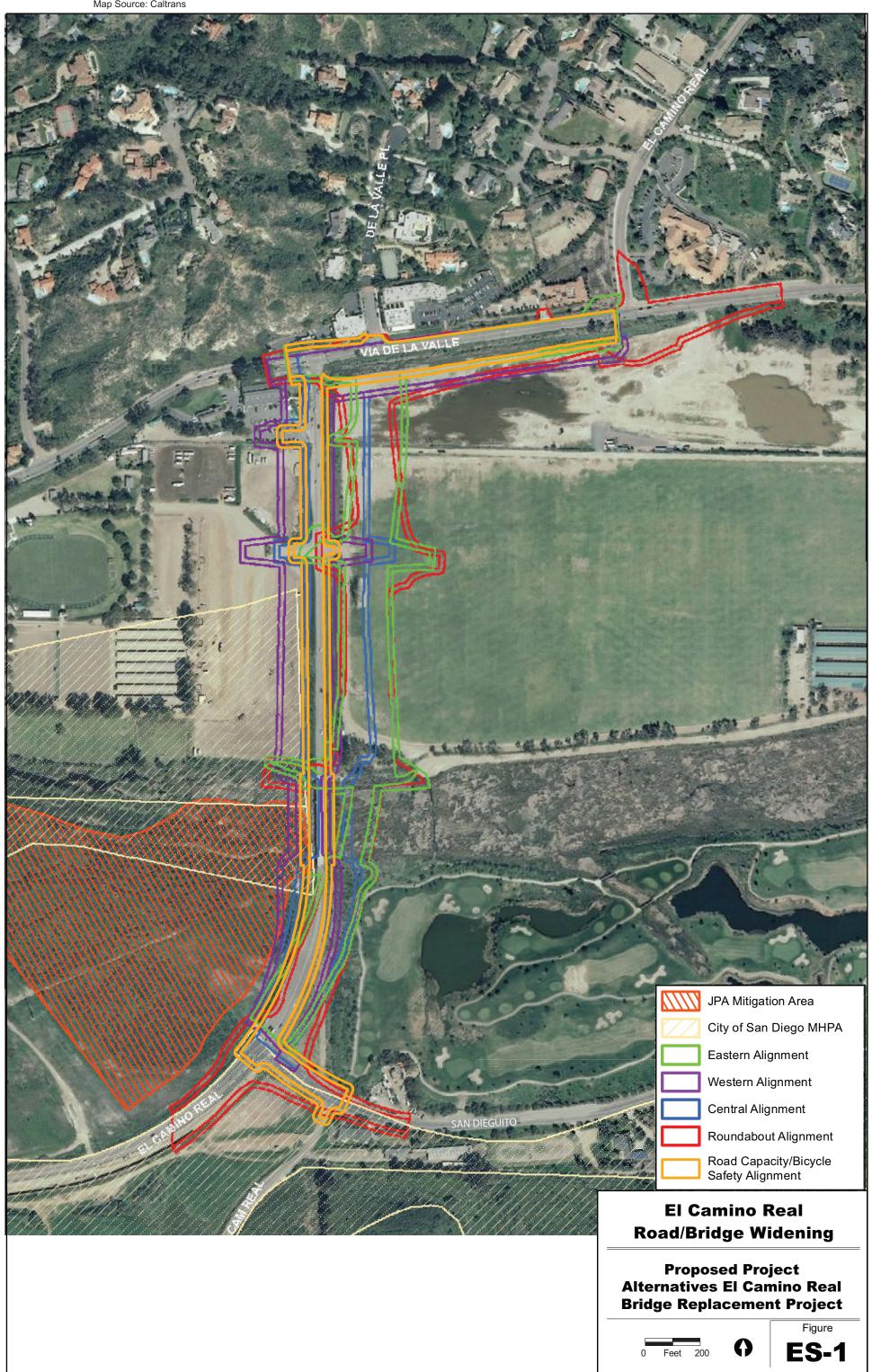
Impact	Threshold	Central	Road Capacity	Bicycle Safety	Western	Eastern	Round- about	Lower Elevation	Mitigation Measures
Biological Resources continued									 Also, trucks with loads carrying vegetation would be covered, and vegetation materials removed from the site would be disposed of in accordance with applicable laws and regulations. In addition, invasive species will be monitored during the protracted construction period and removed or treated in an environmentally sound manner. <u>Additional Mitigation Measures</u> Bio-13: Mitigation, Monitoring and Reporting Conditions for Least Bell's Vireo. Prior to the preconstruction meeting, the City Manager (or appointed designee) shall verify that the project requirements presented in Section 3.12.5.5 regarding the least Bell's vireo are shown on the construction plans.

Impact	Threshold	Central	Road Capacity	Bicycle Safety	Western	Eastern	Round- about	Lower Elevation	Mitigation Measures
Biological Resources continued									Bio-14 : General Nesting Bird Mitigation: To avoid any direct impacts to raptors and/or any native/migratory birds, removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, the Qualified Biologist shall conduct a preconstruction survey to determine the presence or absence of nesting birds on the proposed area of disturbance. The pre-construction (precon) survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the precon survey to City DSD for review and approval prior to initiating any construction activities. If nesting birds are detected, the process provided in Section 3.12.5.5 shall be followed.

GREENHOUSE GAS EMISSIONS

Impact	Threshold	Central	Road Capacity	Bicycle Safety	Western	Eastern	Round- about	Lower Elevation	Mitigation Measures
Operational Emissions	Annual Screening Threshold	NS	NS	NS	NS	NS	NS	NS	No impacts would be significant under CEQA for any greenhouse gas emissions issue. No mitigation measures are necessary for any of the build alternatives.
Construction Emissions	Annual Screening Threshold	NS	NS	NS	NS	NS	NS	NS	
Plans, Policies and Regulations	Conflicts	NS	NS	NS	NS	NS	NS	NS	

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SECTION 1 INTRODUCTION AND ENVIRONMENTAL SETTING

1.1 BACKGROUND

1.1.1 Existing Facility

The City of San Diego (City) proposes to modify the segment of El Camino Real between Via de la Valle and San Dieguito Road in order to improve the structural integrity of the bridge over the San Dieguito River, alleviate problems associated with high flood events, improve pedestrian and vehicular access to nearby coastal and recreational resources, relieve traffic congestion, and improve consistency with the adopted land use plan and adopted Circulation Element for the project area.

The project area is in the northwestern part of the City of San Diego. The City of Del Mar is to the west, the Fairbanks Ranch Country Club development within the City of San Diego is to the east, and County of San Diego lands are to the north. The road being modified is El Camino Real from Via de la Valle on the north to San Dieguito Road on the south. This portion of El Camino Real, classified as a 2-lane collector, is approximately 2,400 feet long, 23 feet wide, has one travel lane in each direction, and has no shoulders, bike lanes, or pedestrian walkways. The road segment includes a bridge over the San Dieguito River that is 340 feet long and 27 feet wide. The San Dieguito River crosses under El Camino Real approximately 1,500 feet south of Via de la Valle.

In this location, El Camino Real would be inundated during a 100-year flood at several low points north of the river. Although the bridge surface would not be inundated, the 100-year flood level would rise to the bottom of the bridge deck, so there is not adequate room to allow debris to pass under the bridge. In addition, the bridge is not structurally adequate for the local seismic conditions, because the piles are relatively shallow and buried in sediments that could fail in an earthquake due to liquefaction. In addition, this segment of El Camino Real is subject to severe congestion during peak travel times. As discussed in Section 1.3.1, the segment of El Camino Real included in the project currently operates at Level of Service (LOS) F at peak hours, reflecting congested traffic conditions.

Modifications to Via de la Valle from El Camino Real on the west to El Camino Real North on the east are also part of this project. As discussed in Section 1.3.1, this segment of Via de la Valle also operates at LOS F. Most of this segment would need to be widened for appropriate transitions from widened El Camino Real.

The nearest freeway access to the project site is from Interstate 5 and the Via de la Valle interchange, approximately 1.4 miles to the west. Interstate 5 also can be accessed from Del Mar Heights Road, which is approximately 1.5 miles south of the project.

The vicinity of the project site is shown in Figure 1-1. The project area is shown in Figure 1-2.

1.1.2 Proposed Project

The proposed improvements include raising and widening El Camino Real roadway and replacing the bridge with a structure that is higher, wider, and has deeper piles. Approximately 1,200 feet

of Via de la Valle also would be widened, from existing El Camino Real to El Camino Real North.

1.1.3 Environmental Document Intended Use

This is a Recirculated Project Environmental Impact Report (EIR) as defined by Sections 15088.5 and 15161 of the California Environmental Quality Act (CEQA) Guidelines, and will be certified by the City. The format and content of this EIR comply with CEOA guidance and issues raised during public scoping. The document organization was set in 2006 and was designed to comply with the City of San Diego Environmental Impact Report Guidelines updated May 2005, and the City of San Diego Scope of Work for Draft Environmental Impact Report/Environmental Assessment (EIR/EA) for the El Camino Real Road Widening/Bridge Replacement Project (LDR No. 42-0351, PTS No. 2982) updated and reissued November 6, 2002. The original Draft EIR was circulated for public review from July 25, 2006 to September 7, 2006. Twenty letters of comment were received by the City. The City conducted an extensive and lengthy outreach effort to the public and resource agencies following close of the comment period. Based on that effort, changes have been made to the alternatives and the proposed mitigation plan. In addition, changes have occurred within the project area due to the passage of time. These changes are reflected throughout the EIR. In order to provide a meaningful opportunity for the public to comment on these changes, the entire EIR is being recirculated for public review. The City has determined it will respond to comments to the EIR pursuant to CEQA Guidelines Section 15088.5 (f)(1), as follows:

When an EIR is substantially revised and the entire document is recirculated, the lead agency may require reviewers to submit new comments and, in such cases, need not respond to those comments received during the earlier circulation period. The lead agency shall advise reviewers, either in the text of the revised EIR or by an attachment to the revised EIR, that although part of the administrative record, the previous comments do not require a written response in the final EIR, and that new comments must be submitted for the revised EIR. The lead agency need only respond to those comments submitted in response to the recirculated revised EIR.

In accordance with CEQA Guidelines, all reviewers are hereby notified that new comments must be submitted for the recirculated EIR. In compliance with CEQA Guidelines Section 15088.5 (f)(3), the City shall send a notice of recirculation as required by Public Resources Code Section 21092.1 to every agency, person, or organization that commented on the prior EIR. This notice shall indicate that new comments must be submitted on the entire EIR. Revisions to the EIR are summarized in Section 2.5, History of Project Changes, of this recirculated EIR, as required by CEQA Guidelines Section 15088.5 (g). Comment letters received on the 2006 Draft EIR are presented in Appendix E.

In general, the intended use of this document is to provide decision-makers and the public with information about the consequences of the proposed build alternatives. Project-related consequences were determined by describing existing conditions, superimposing a given alternative on this setting, and then analyzing the effects that would occur if that project alternative were implemented. This process was conducted separately for each environmental issue examined, including land use, traffic/circulation, hydrology/water quality, and biological resources.

Seven build alternatives are analyzed at an equal level of detail in this EIR. This was done because federal funding was requested from and has been obligated by the Federal Highway

Administration (FHWA) for improvements to the bridge through the Highway Bridge Replacement and Rehabilitation (HBRR) program (now the Highway Bridge Program, or HBP). Therefore, the National Environmental Policy Act (NEPA) must be satisfied as well as CEQA. FHWA is the lead agency under NEPA. The California Department of Transportation District 11 (Caltrans) is the local assistance liaison between the City and FHWA. A separate EA that meets the guidelines of FHWA and Caltrans is being prepared to satisfy NEPA. Multiple alternatives were analyzed in detail in this EIR to facilitate consistency with the separate EA. Also, to facilitate consistency between this EIR and the EA, the discussion of project goals and objectives has been prepared in accordance with Caltrans/FHWA guidelines for discussion of purpose and need.

The environmental review process will not be complete until FHWA signs a Finding of No Significant Impact (FONSI) for the separate EA. Until the FONSI is signed, the City cannot access federal funds for final design, right-of-way arrangements, or the construction bidding process. In addition, as explained in Section S.1.2, FHWA will not provide federal funding for an alternative that is not considered feasible under NEPA.

1.2 PROJECT GOALS AND OBJECTIVES (PURPOSE)

The goals and objectives (purposes) of the proposed project are the following:

- 1) To provide structurally sound and operationally efficient access across the San Dieguito River during flood and non-flood events
- 2) To provide congestion relief in order to improve traffic flow
- 3) To obtain improved consistency with the adopted land use plans in the project area
- 4) To improve pedestrian and vehicular access to nearby coastal and recreational resources

1.3 PROJECT NEED

The specific problems associated with the existing transportation facility involve several categories of needs. These are (1) capacity and transportation demand, (2) roadway and bridge deficiencies, (3) local land use plan and policy consistency, and (4) regional transportation plan consistency.

1.3.1 Capacity and Transportation Demand

LOS is a standard by which the operating conditions of a given roadway segment or intersection is measured. Level of service is defined on a scale of A to F, where LOS A represents free flowing traffic conditions, LOS C represents stable flow with speed and maneuverability more closely controlled by higher traffic volumes, and LOS F represents forced flow, many stoppages, and low operating speeds. The City of San Diego encourages operation of LOS D or better at intersections and on roadway segments, although LOS D is acceptable in high density areas. LOS D represents conditions approaching unstable flow.

Analysis of existing roadway level of service was conducted for El Camino Real and Via de la Valle. El Camino Real between Via de la Valle and San Dieguito Road is categorized as a 2-lane collector and carries 14,559 cars per day in terms of average daily traffic (ADT) based on

November 2011 traffic counts. An unacceptable LOS E for this type of road would be generated with 10,000 ADT. Therefore, this segment of El Camino Real currently operates at LOS F conditions. In the future year 2035, El Camino Real between Via de la Valle and San Dieguito Road is projected to carry 33,000 ADT in the No Build scenario, resulting in more severe congestion.

Via de la Valle between El Camino Real and El Camino Real North is categorized as a 2-lane collector and carries approximately 16,000 ADT based on November 2011 traffic counts. An unacceptable LOS E for this type of road would be generated with 10,000 ADT. Therefore, this segment of Via de la Valle currently operates at LOS F conditions. In the future year 2035, Via de la Valle between El Camino Real and El Camino Real North is projected to carry 26,000 ADT in the No Build scenario, resulting in more severe congestion.

1.3.2 Bridge and Roadway Deficiencies

1.3.2.1 Bridge Seismic Issues

The project site is located within geologic hazard zones 31 and 32 as shown on the City's Seismic Safety Study Geologic Hazards Maps. Hazard Zone 31 is characterized by a high potential for liquefaction-shallow groundwater, major drainages, and hydraulic fills. Hazard Zone 32 is characterized by fluctuating groundwater within minor drainages where the potential for liquefaction is low. Based on the study of geotechnical and structural conditions conducted for this project (Ninyo & Moore 2005, updated 2012), the existing bridge is vulnerable to damage in a severe seismic event. The top 20 feet of the existing, 33-foot-deep bridge piles are set in sediments that could liquefy in an earthquake (meaning the sediments would change from being solid sand or silt to being in a liquid state due to vibration). In a liquefied state, the formation would lose lateral capacity, and not be able to hold the piles securely. The geotechnical report concluded that the bridge abutment slopes could slide in a major earthquake. Although the bridge approaches are built such that they do not need to be supported by the embankments (i.e., the roadway at either end of the bridge is "cantilevered" into the embankments), the slope failure would damage the road to a point where cars could not cross the bridge. The geotechnical study for this project also indicates that the potential for strong ground shaking is high. Therefore, based on the geotechnical study, the bridge is susceptible to becoming unusable after an earthquake because the embankments could slide and the piers could shift.

1.3.2.2 Substandard Flood Level Clearance

Hydraulic analyses to determine flood elevations in the river channel upstream and downstream of the bridge indicate that the 100-year water surface elevation would rise above the bottom of the bridge, but would not overtop the bridge deck. The 100-year water surface elevation was estimated to be at 20.2 feet above mean sea level (msl). The top part of the existing bridge (superstructure) is composed of open girders that vary in thickness, forming an arch shape between each pier wall. Therefore, the underside of the bridge is at different elevations across the bridge in the middle of the spans between the piers are higher than 21 feet above msl, meaning the middle of each span is above the 100-year flood level. However, at the northern pier wall, the underside of the bridge does not completely convey the 100-year flood. Debris in the river carried during a large flood event could be trapped at the bridge, further decreasing capacity. Debris and flood flows could also damage the gas pipeline mounted on the bridge. Therefore, the entire bridge should be raised above the 100-year flood level. Requirements of Caltrans for a typical box

girder type bridge include the low chord being above the elevation of the 50-year flood plus 2 feet of extra height above the flood level (freeboard), or the elevation of the 100-year flood, whichever is greater.

1.3.2.3 Scour

Hydraulic modeling of the river in the study area indicates scour (erosion) of the channel bed during high flow events could be deep. There are two components of scour, "contraction" scour and "local" scour at piers. The contraction scour can result from a reduction of the flow area, an increased flow at the bridge, or both. The scour is the result of increased velocities and shear stress on the channel bed. Local scour around piers, abutments and embankments is caused by an acceleration of flow around obstructions in the path of the water flow. A riprap (rock) layer was placed under the river bottom to prevent the sewer pipeline that crosses the river near the bridge from being undermined. This existing buried riprap layer also protects the existing bridge foundation footings. However, without the riprap "blanket," potential scour could extend as deep as elevation 15 feet below msl. The bottom of the existing bridge footings are at elevation 0 feet msl, which indicates that potential scour could undermine the existing footings and expose piling. This finding indicates that the new bridge should have deeper pile cap foundations, or use a type of pier that would not require pile caps. To correct the issue of potentially deep scour, the project would construct a new bridge with piles made of concrete cast in holes drilled deep into the ground. The piles would extend approximately 90 feet into the ground, so would not be susceptible to damage from scour. Also, any of the riprap blanket that would have to be moved during construction would be replaced.

1.3.3 Applicable Land Use Plans and Policies Consistency

1.3.3.1 General Plan

The affected portion of El Camino Real is in the northwestern part of the North City Future Urbanizing Area (NCFUA), a diverse planning area that extends from Interstate 5 (I-5) on the west to Interstate 15 (I-15) on the east, and from Los Penasquitos Canyon on the south to Santa Fe Valley on the north. The NCFUA Framework Plan (City of San Diego 1995) was initially adopted by the City Council in 1992 as an amendment to the General Plan in effect at that time. A portion of the Framework Plan Diagram is presented in Figure 1-3. The Framework Plan includes guiding principles, which are broad goal or policy statements to be used in evaluating future planning efforts in the NCFUA. The Framework Plan also contains implementing principles, which are more specific standards or criteria intended to implement the guiding principles. The implementing principles may be supplanted by zoning after new zones have been applied to the NCFUA. City zoning and the Framework Plan are the governing land use documents for the project area. The NCFUA encompasses five planning subareas. Subarea boundaries were delineated in the City's NCFUA Framework Plan based on property lines, natural and manmade landscape features, and land use designations. El Camino Real is the eastern boundary for NCFUA Subarea II (San Dieguito). Lands east of existing El Camino Real and north of Via de la Valle are outside of the NCFUA.

The Framework Plan designates El Camino Real as a four-lane Major Arterial with an LOS of B. However, El Camino Real is currently a two-lane collector operating at LOS F. Therefore, this project proposes modifications to improve compatibility with the approved planning documents for the area in terms of road classification and LOS. El Camino Real is identified on the 2008 City of San Diego General Plan Land Use and Street System Map (Land use Element, Figure LU-2).

1.3.3.2 Local Coastal Program

The Land Use and Community Planning Element of the 2008 General Plan discusses permitting within the Coastal Zone. The City has the authority to issue Coastal Development Permits for areas of the Coastal Zone where the Coastal Commission has certified the Local Coastal Program (LCP) land use plan and related Implementation Program in the form of code regulations. These areas are known as "coastal commission certified areas." These certified areas can lie within appealable as well as non-appealable areas. The Land Use Element notes that "areas of deferred certification" constitute another category of land in the Coastal Zone. In these areas, the Coastal Commission has not yet certified the City's land use plan, and therefore retains coastal development permit authority. There are also "areas of original jurisdiction" or "coastal Commission permit jurisdiction" that are not part of the City's LCP and where the Coastal Act intends jurisdiction and permit authority to remain with the Coastal Commission.

On the City of San Diego Coastal Development Permit Jurisdiction Map C-730.1 42 of 44 (City of San Diego 1988a), the Coastal Zone boundary within the project area is shown on the alignment of existing El Camino Real between Via de la Valle and San Dieguito Road, and on the alignment of Old El Camino Real south of San Dieguito Road. On City of San Diego Coastal Development Permit Jurisdiction Map C-730.1 44 of 44, the Coastal Zone boundary is on the south side of the City-County line north of Via de la Valle, then extends along the alignment of El Camino Real North (Figure 1-2). The Coastal Zone is west of the boundary line, and the City will coordinate and the Coastal Development Permit for project impacts within the Coastal Zone through the California Coastal Commissionwould be issued by the City of San Diego. The San Dieguito River corridor west of El Camino Real is indicated as being within Coastal Commission Appeal Jurisdiction on Map C-730.1 42 of 44 (see Figure 3.1-3). Pursuant to the certified Coastal Zone Boundary maps adopted by the Commission pursuant to Section 30103(b) of the Coastal Act, where the Coastal Zone boundary follows road or railroad rights-of-way, the boundary of the Coastal Zone shall be the inland boundary of the improved right-of-way as it exists as of January 1, 1977, or as modified by closure or additional improvement thereafter provided that it shall not be more than 100 yards inland from the center line.

In the North City LCP Land Use Plan approved by the City Council on March 31, 1981, the Coastal Zone boundary is shown along Old El Camino Real north to the intersection with Via de la Valle. The LCP is designed to address the goals, policies, and requirements of the California Coastal Act of 1976. The combination of the goals in the LCP and the general goals of the Coastal Act provide guidance for project needs. Among the relevant goals in the Coastal Act is maintenance and enhancement of public access (Section 30252). Ways to achieve this goal include facilitating transit service and providing non-automobile circulation. Also, the Coastal Act calls for minimization of adverse impacts (Section 30253) by minimizing risks to life and property in areas of high geologic, flood, and fire hazard. The City's LCP includes the following regional accessways goal: "Provide for maximum public access by linking community centers, and residential and commercial areas to the shoreline through improved major streets, railines, public transit, mini transit and bikeways." The proposed project would serve these needs by widening the roadway and improving capacity to make the route more attractive for buses, adding bike lanes and pedestrian walkways (for most alternatives), enhancing the equestrian crossing under the bridge (for all but one alternative), replacing the bridge with a seismically adequate structure, and raising the bridge and road above the 100-year flood level.

As part of the City's LCP, the Coastal Commission identified 17 geographic areas, districts, or sites in an Exhibit "A" that was part of the LCP and would be areas of deferred certification. As part of this Exhibit "A" one geographic area identified for deferred certification was "Portions of

the San Dieguito River Valley located outside the North City West Community Plan and the redefined floodway/floodplain fringe zones addressed under the resubmitted North City LUP, dated August 1985." While portions of the proposed El Camino Real Bridge project fall within this area of deferred certification, the majority falls within the area shown on San Diego's C-730 map series as either non-appealable area 1 or appealable. In areas of deferred certification, coastal development permit jurisdiction rests with the Coastal Commission, not the City. According to the Coastal Commission's comment letter on the 2006 Draft EIR, their partial approval of the NCFUA in 1993 specifically identified that coastal development permit authority would only transfer to the City upon certification of subarea plans. The project site is generally located in Subarea II of the NCFUA. Since no subarea plan has ever been certified for Subarea II, it is the Coastal Commission's position that the entire subarea remains in the Coastal Commission's coastal development permit jurisdiction, and that the legal standard of review for the coastal development permit is Chapter 3 of the Coastal Act.

1.3.3.3 Recreational Plans

In 1994, the San Dieguito River Park Concept Plan was adopted to establish the goals for the future of the San Dieguito River Valley and to develop a planning framework for future park implementation. The park objectives presented in the concept plan are preservation of open space, conservation of sensitive resources, protection of water resources, preservation of the natural floodplain, retention of agricultural uses, and creation of recreational and educational opportunities.

The project is within the boundaries of the focused planning area (FPA) for the San Dieguito River Valley Regional Open Space Park. The River Park project is being developed by the San Dieguito River Park Joint Powers Authority (JPA), and is planned to extend from the beach at Del Mar to Volcan Mountain just north of Julian. The 55-mile-long regional park will be connected with the phased construction of a regional trail. This Coast to Crest trail is intended to be a multi-use trail for hikers, joggers, nature enthusiasts, equestrians, and bicyclists. The Coast to Crest Trail in the project vicinity is complete from Jimmy Durante Boulevard (in Del Mar) to El Camino Real and currently dead ends at El Camino Real. The River Park project involves equestrian, pedestrian, and/or bicycle paths and river crossings on and adjacent to El Camino Real.

The JPA has been empowered by its member agencies to develop land use and development guidelines for the park's FPA. The City of San Diego is a member agency of the JPA. The concept plan for the River Park indicates that improvements to existing public facilities such as El Camino Real should be permitted in the FPA, but should be compatible with the park objectives, including creation of recreational and educational opportunities.

The proposed project is east of the eastern edge of the San Dieguito Lagoon Wetlands Restoration Project, which involves restoration of 150 acres of coastal wetland to mitigate the estimated impact on marine fish populations of the cooling water systems for San Onofre Nuclear Generating Station (SONGS) Units 2 and 3. The California Coastal Commission (CCC) coastal development permit for SONGS Units 2 and 3 revised in 1997 included the wetlands restoration requirement. Southern California Edison (SCE), representing the SONGS owners, worked in partnership with the JPA to carry out the restoration project. A Final Restoration Plan was completed in collaboration with local, state and federal agencies including the cities of Del Mar and San Diego, California Department of Fish and Wildlife (CDFW, formerly California Department of Fish and Game), U.S. Fish and Wildlife Service (USFWS), and National Marine Fisheries Service (NMFS). Construction of the project is complete. The CCC permit design criteria required that the restoration must maintain an open ocean inlet to the lagoon, must not increase river scour (the erosion of stream banks caused by water flow), or cause beach sand loss, and must result in at least 150 acres of restored wetlands. As a neighboring project, the City's El Camino Real Bridge/Road Widening Project alternatives should not interfere with the goals and requirements of the San Dieguito Lagoon Wetlands Restoration Project.

1.3.3.4 Regional Transportation Plan Consistency

Of interest for Caltrans on this project is the additional guidance for transportation projects provided by the San Diego Region of Governments (SANDAG), a regional planning agency, in regards to the policies and objectives of the SANDAG Regional Transportation Plan and the Regional Transit Vision. Section 6 (Bicycles and Pedestrians) of the Regional Transportation Plan notes that the San Dieguito River Bikeway, a JPA project, will be a hard surface trail running from the City of Del Mar on the west to east of Interstate 15. The Regional Transit Vision includes goals such as making walking "more convenient, faster, and safer," and encouraging "more smoothly flowing automobile traffic." Other relevant policies of the Regional Transportation Plan include the completion of gaps in the continuity of pedestrian and bicycle facilities; integration into the existing multimodal transportation network; encouragement of safe use of facilities; and meeting requirements of the Americans with Disabilities Act.

Currently, there are no sidewalks, no dedicated horse paths, and no designated bicycle lanes on the portion of El Camino Real addressed in this EIR. The bridge is narrow and provides no facilities for pedestrians. There are no controlled pedestrian or equestrian crossings.

1.4 PROJECT BOUNDARIES

1.4.1 Southern Boundary

The southern boundary for the project is at San Dieguito Road. This location was selected for the reasons summarized below.

The design deficiencies the proposed project would correct are focused on the bridge over the San Dieguito River. If the bridge is raised higher to be above the 100-year flood level, the road to the south must be higher to line up vertically with the bridge. However, the higher road elevation could transition back to existing ground elevation at San Dieguito Road. El Camino Real south of San Dieguito Road is not in the 100-year floodplain, so there is no need to raise the road south of this point. Also, other entities have taken responsibility for widening the southern segment of El Camino Real from San Dieguito Road to the full width improvements north of Sea Country Lane, a distance of approximately 0.9 mile. The improvements for the portion of El Camino Real south of San Dieguito Road completed in 2010 included widening to four lanes and providing bike lanes and a raised median.

1.4.2 Northern/Eastern/Western Boundaries

The northern end boundary of El Camino Real is basically a three-way intersection where it meets Via de la Valle, although cars can enter a commercial driveway on the northern leg of the intersection. This is the northernmost extent of the portion of El Camino Real affected by the proposed change in elevation of the bridge. This is also the road segment that is currently operating at a congested traffic level of service (LOS F). El Camino Real continues northward approximately 1,080 feet to the east of the existing intersection. However, El Camino Real North carries substantially less traffic (approximately 3,664 ADT in existing conditions based on

November 2011 traffic counts and 7,000 ADT projected in Year 2035), so would not need a capacity increase now or in the future.

The eastern end boundary for the project is the intersection of Via de la Valle and El Camino Real North. City of San Diego design standards for transitioning from the modified intersection at the project portion of El Camino Real and Via de la Valle require widening eastward along Via de la Valle for a minimum of approximately 800 feet. To provide logical striping for drivers and to facilitate coordination with future development of the property on the south edge of Via de la Valle between El Camino Real and El Camino Real North, widening would be constructed all the way to the intersection.

The proposed widening of El Camino Real would transition into Via de la Valle at the northern/western end. Currently a 2-lane collector in the project area, Via de la Valle is planned to be widened to four lanes from El Camino Real westward to the existing 4-lane configuration near San Andreas Drive. This independent project is addressed in a separate environmental document being prepared by others. The alternatives for widening Via de la Valle to the west of the existing intersection with El Camino Real are being determined by existing developed land uses and steep slope conditions. The future intersection with El Camino Real is not a factor.

One alternative studied in detail in this recirculated EIR proposes roundabouts instead of typical signalized intersections. For this alternative only, adequate transitions would require project boundaries to extend beyond the southern, northern, eastern, and western limits discussed above.

1.5 CEQA REQUIREMENTS

1.5.1 CEQA Impact Analysis

To satisfy CEQA, analysis is conducted in reference to the City of San Diego CEQA significance thresholds. Based on this analysis, impacts are determined to be as follows:

- Not significant
- Adverse but not significant
- Significant and mitigable
- Significant and unmitigable

"Mitigable" means measures are available to reduce the impact to below a level of significance. "Unmitigable" means the impact cannot be reduced to below a level of significance, although some mitigation measures may be proposed. Unmitigable impacts under CEQA are important because the decision-makers must balance the benefits of a proposed project against its unmitigable environmental impacts in determining whether to approve the project (CEQA Guidelines Section 15093). A project may be approved despite unmitigable impacts under CEQA. However, the lead agency must make findings about mitigation measures and alternatives, and must prepare a Statement of Overriding Considerations to specify the reasons supporting its decision to override.

1.5.2 Decisions to Be Made and Permits Required

The City of San Diego will have to certify this EIR under CEQA in order to approve the proposed project for construction as Capital Improvement Project No. 52-479.0. Project implementation will also require City approval of a Site Development Permit (SDP) and processing of a Coastal Development Permit through the CCC for areas within City jurisdiction, which could be appealed

to the CCC. Other state, regional, and local agencies will use this document to make discretionary decisions regarding project permits and funding, in accordance with CEQA requirements.

Caltrans/FHWA will need to approve the separate EA under NEPA, conclude that no significant impacts under NEPA would occur, and prepare a FONSI before federal funding for final design, right of way acquisition and construction can be accessed for the project.

As part of its approval of an Individual 404 Permit for the project, the U.S. Army Corps of Engineers (USACE) determines that the environmental document complies with Clean Water Act Section 404(b)(1) Guidelines for impacts to Waters of the U.S. The USACE and U.S. Environmental Protection Agency (EPA) also have the authority over granting the Individual 404 Permit for proposed impacts to wetlands. An important point for the USACE is the identification of the Least Environmentally Damaging Practicable Alternative (LEDPA). The USACE will use the information in this EIR and in the separate EA for this project to prepare their own environmental documentation for the Individual 404 Permit.

In addition to CEQA, NEPA, and the Clean Water Act, the proposed project must comply with the provisions of a wide range of other environmental laws and regulations, including the following:

- Federal and State Endangered Species Acts
- Fish and Wildlife Coordination Act
- National Historic Preservation Act
- Clean Air Act
- National Flood Insurance Act
- Resource Conservation and Reclamation Act

The following permits or approvals would be needed for the project:

- USACE Individual 404 Permit for proposed impacts to federally protected waters and wetlands
- USFWS Section 7 permit consultation for proposed impacts to any federally listed species (clapper rail, a bird that is listed as state and federally endangered, has been detected in the San Dieguito River near the bridge)
- CDFW 1602 Streambed Alteration Agreement for proposed diversion or modification of state-protected streams or waters
- CDFW Memorandum of Understanding for proposed impacts to any state-listed threatened or endangered species (e.g., clapper rail)
- State Water Resources Control Board (SWRCB) National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities Order No. 2009-0009-DWQ NPDES No. CAS000002 (adopted September 2, 2009)
- California Regional Water Quality Control Board (RWQCB), San Diego Region 401 Water Quality Certification for assessment of effects to water quality from federally permitted impacts to wetlands or waters via the Individual 404 Permit

- California RWQCB, San Diego Region Waste Discharge Requirements for Discharges of Urban Runoff from the Municipal Separate Storm Sewer Systems (MS4s) Draining the Watersheds of the County of San Diego, the Incorporated Cities of San Diego County, the San Diego Unified Port District, and the San Diego County Regional Airport Authority, Order No. R9-2007-01, NPDES No CAS0108758. In addition, the City of San Diego Storm Water Standards dated January 14, 2011 constitutes a manual for construction and permanent storm water Best Management Practices (BMP) requirements developed by the City to comply with the MS4 permit.
- National Historic Preservation Act compliance under Section 106 of 36 CFR 800 for potential impacts to historic properties
- CCC approval of a Coastal Development Permit in City jurisdiction (if appealed), and for any project features that extend into CCC permit jurisdiction or deferred certification, and Coastal Zone Boundary Determination. Also, a Federal Consistency Certification from the CCC may be required due to federal involvement in project permits and funding.
- Federal Emergency Management Agency approval of a Letter of Map Revision (LOMR), for changes to the floodplain, if required
- City of San Diego Site Development Permit
- City of San Diego Coastal Development Permit (appealable to the CCC) for areas in City jurisdictionCity of San Diego coordination with CCC for a Coastal Development Permit
- City of San Diego approvals for final design and construction activities, including grading, erosion control, and traffic control
- County of San Diego approvals for construction activities within County jurisdiction
- A "permission to grade letter" from San Diego Gas & Electric (SDG&E) for any grading to be performed within SDG&E right of way
- Coordination with SDG&E for project grades to assure clearances as required by California Public Utilities Commission General Order 95

1.5.3 Scoping and Key Issues

The revised NOP was distributed by the State Clearinghouse on November 6, 2002, to the following state agencies:

- Resources Agency
- Department of Boating and Waterways
- Department of Conservation
- Office of Historic Preservation
- Department of Parks and Recreation
- Department of Water Resources
- CDFW Region 5
- Native American Heritage Commission
- State Lands Commission

- Caltrans District 11
- Air Resources Board, Transportation Projects
- RWQCB, Region 9

The 2002 NOP and response letters are included in Appendix A of this EIR. Written comments to the 2002 NOP are summarized in Table 1-1, which includes the Section of this EIR where these issues are addressed.

Source (Agency/Contact)	Date	Comments	EIR Section Where Comments Are Addressed
State Clearinghouse / Becky Frank	Nov. 6, 2002	Document sent to checked agencies November 6, 2002.	Appendix A
U.S. Fish and Wildlife Service & California Department of Fish and Wildlife (Wildlife Agencies) / Susan Wynn & William Tippets	Dec. 12, 2002	Summary of major concerns: potential effects to biological resources within the San Dieguito River, potential impacts to endangered light-footed clapper rail, wildlife corridors and movement, and sensitive riparian species.	Section 3.12
		Major Concerns 1.a.1 Provide a thorough analysis of the project's potential impacts on the riparian system supported by the San Dieguito River, and potential indirect impacts on the morphology, habitat, and natural functions of the system.	Section 3.12
		1.a.2 Analyze effects on the existing hydraulics of the San Dieguito Lagoon, including scouring and deposition patterns.	Section 3.7
		1.a.3 The preferred alternative should not adversely affect the design hydrology intended for the JPA Restoration Plan.	Section 3.7
		1.a.4 Clarify the need and purpose of widening the river upstream and downstream of the bridge.	N/A River widening concept eliminated
		1.b.1 Discuss the proposed reduction of the floodplain (including a quantification of the reduction in flood flow capacity) and the resulting need to widen the river.	Section 3.7 River widening concept eliminated
		1.b.2 Consider an alternative design with the proposed bridge spanning the entire 100-year floodplain using supports that do not occupy large areas of the floodplain, and other designs that would not adversely affect stream morphology and floodplain function and connectivity.	Section 5
		1.c. Clarify whether any of the area used to widen the San Dieguito River would be considered as mitigation for the impacts on wetlands. Any portion of that area requiring maintenance at any frequency would not be acceptable to the Wildlife Agencies as mitigation.	N/A River widening concept eliminated

Table 1-1 Summary of Comments on the 2002 Notice of Preparation

Source			EIR Section Where Comments
(Agency/Contact)	Date	Comments	Are Addressed
		1.d.1 Include a discussion of (a) the entire riparian area that would be partially or fully shaded, and (b) the existing riparian habitat that would require maintenance at any frequency to maintain the hydraulic capacity of the modified 100-year floodplain.	Section 3.12
		1.d.2 Propose appropriate mitigation for these impacts. Off-site mitigation should be within the San Dieguito River watershed and enhance existing watershed level restoration efforts.	Section 3.12
		2. Light-footed clapper rail occurs within the preferred alternative footprint. Survey the San Dieguito River for this species, to determine if the clapper rail is utilizing the emergent wetlands around the existing El Camino Real bridge. Discuss the presence of the clapper rail within the project APE.	Section 3.12
		3.a Comprehensively discuss wildlife corridors and movement.	Section 3.12
		3.b Include a cumulative discussion about the river widening on the Boudreau property in the biology section of the EIR/EA.	N/A Property purchased by JPA, and river widening concept eliminated
		3.c Consider measures listed in comment letter for mitigation.	Section 3.12
		3.d If necessary, the City should conduct a wildlife movement study. If a study is not done, the EIR/EA should demonstrate that the information used for the impact analysis is adequate.	Section 3.12
		4.a In addition to species listed in the NOP letter, habitat evaluation and/or surveys are recommended for all California Species of Special Concern (e.g. western spadefoot), and species designated as locally rare associated with the wetland habitats that would be affected, and all avian species that may nest within the project's APE.	Section 3.12
		4.b Time project construction to avoid direct and indirect impacts to all such species.	Section 3.12
		Additional Comments 1.a Ensure and verify that all requirements and conditions of the Subarea Plan and Implementing Agreement are met.	Section 3.1
		1.b Address biological issues that are not addressed in the Subarea Plan and Implementing Agreement.	Section 3.12

Source (Agency/Contact)	Date	Comments	EIR Section Where Comments Are Addressed
		2. Describe why the proposed project, irrespective of other alternatives to the project, is consistent with and appropriate in the context of the Subarea Plan.	Section 3.1
		3. USFWS is signatory to the NEPA/404 Integration Process, and agency participation and concurrence is needed for purpose and need and alternatives.	Section 1 Project is not in NEPA/404 Process
		4. Provide draft findings for a deviation from the Environmentally Sensitive Lands Regulations for uses within the Coastal Overlay Zone pursuant to Section 126.0708.	Section 3.1
		5. Follow restrictions for vegetation clearing in Additional Comment 5.	Section 3.12
		6. Clarify that a biological assessment is required for both informal and formal Section 7 Consultation under the Act if the project results in a "may effect" to federally listed species.	Section 3.12
		7. Discuss biological resources within the project APE, not just within the project footprint.	Section 3.12
		8. Discuss the use of non-invasive, preferably native species for all proposed landscaping (e.g., median and shoulders).	Section 2
		9.a In Hydrology/Water Quality, address increased peak flows from increased impervious surface area associated with the road widening and provide mechanisms for attenuating these flows to preconstruction conditions.	Section 3.7
		9.b Quantify and propose mitigation for the habitat used to accommodate the associated best management practices.	Section 3.7 Section 3.12
		10. A Streambed Alteration Agreement will be required. Fully identify the potential impacts to the river, riparian resources, and wetlands, and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the agreement.	Section 1 Section 3.12
		11. Add to the regulatory actions a SWRCB General Construction Storm Water Permit.	Section 1
		12. Substantiate the need for any features of the proposed project designed to address seismic stability that would also increase biological impacts.	Section 3.8

Source	Dete	Commenter .	EIR Section Where Comments
(Agency/Contact) San Dieguito River Valley Regional Open Space Park Joint Powers Authority /	Date Dec. 5, 2002	Comments The NOP adequately references the project site's location in the River Park's Focused Planning Area, and recognizes potential impacts.	Are Addressed Section 3.1
Shawna Anderson		The EIR/EA should specifically evaluate the project's compatibility with the River Park's proposed wetland restoration project at the San Dieguito Lagoon. El Camino Real represents the eastern boundary of the restoration project, anticipated to be under construction beginning late 2003.	Section 3.1 San Dieguito Lagoon Restoration Project is complete.
City of San Diego Water Review Section / Chris Gascon	Dec. 4, 2002	No comments to incorporate.	N/A
SDG&E / Patrick O'Neill	Nov. 13, 2002	Include specific environmental impact analyses related to any proposed utility relocation, including any new facilities, such as poles needed to accommodate the relocations.	Section 3.6
		Describe any SDG&E utility/facility that could be impacted and identify the utility on all diagrams. Several electric distribution poles and one electric transmission tower are located within the project site boundary. Underground utility facilities are also located in the area of the project site.	Section 3.6
		Access to any transmission and distribution facilities must be provided during and after construction.	Section 3.6
		Proposed access roads and grading must comply with SDG&E Guidelines.	Section 3.6
		Grading to be performed within SDG&E right of way would require a "permission to grade letter" from SDG&E.	Section 1
		Any changes in grade shall not direct drainage in a manner that increases the potential for erosion around SDG&E facilities or access roads.	Section 3.7
		Project grades shall be coordinated to assure clearances as required by California Public Utilities Commission General Order 95.	Section 3.6
		Any temporary or permanent relocation of facilities or placement of facilities underground and/or associated temporary outages shall be completed at the cost of the City of San Diego.	

Source			EIR Section Where Comments
(Agency/Contact)	Date	Comments	Are Addressed
Stephenson Worley Garratt Schwartz Garfield & Prairie / Donald Worley (with attachments)	Dec. 4, 2002	a. They represent Dr. and Mrs. T.C. Hu, property owners at the southeast corner of Via de la Valle and El Camino Real. There are historical drainage issues due to drainage from a convalescent home across Via de la Valle.	Section 3.7 This property has since been sold.
attactiments)		b. Also, the raised elevation of the roadway will undoubtedly increase runoff and/or the velocity of runoff onto the Hu property. This needs to be addressed in the EIR/EA and appropriate mitigation measures adopted.	Section 3.7
		c. The "hole" created by the proposed new elevation of El Camino Real can be filled as part of this project and it will not only solve the adverse drainage condition but also provide access to El Camino from the Hu property, as other adjacent properties enjoy access.	Section 3.7
		d. Because the whole purpose of the new project is to address flooding impacts in the area, it would seem logical to solve local drainage conditions which now exist and will be exacerbated by the project.	Section 2 Section 3.7

1.5.4 Issues Analyzed in EIR

A full range of environmental issues are examined in this EIR. No issues were dismissed based on the Initial Study. The major environmental issues addressed in Section 3 are as follows:

- Land Use
- Traffic/Circulation
- Visual/Aesthetics
- Historical Resources
- Farmlands/Agricultural Lands
- Public Utilities/Services
- Hydrology/Water Quality
- Geology/Seismicity/Soils
- Paleontological Resources
- Air Quality
- Noise
- Biological Resources
- Greenhouse Gas Emissions
- Growth-Inducing Impacts

1.6 ENVIRONMENTAL SETTING

This section provides a general setting discussion. Specific, detailed information related to each environmental issue is presented in the individual environmental analysis sections in Section 3.

1.6.1 Jurisdictions and Planning Areas

The portion of El Camino Real addressed in this EIR is in the northwest region of the City of San Diego. The City of Del Mar is to the west, and County of San Diego lands are to the north and

east. The proposed mitigation lands and the southern end of the proposed project at San Dieguito Road are within the City's Multiple Species Conservation Program (MSCP) Multi-Habitat Planning Area (MHPA). As discussed in Section 1.3.3, the Coastal Zone boundary is along El Camino Real, and the zone is west of the boundary. Coastal Development Permit Jurisdiction maps C730.1 (42 of 44 and 44 of 44) indicate the project areas that are within the Coastal Zone. are in City of San Diego Coastal Development Permit jurisdiction. The San Dieguito River is in Coastal Commission Appeal Jurisdiction, and the other coastal zone areas are in Non-Appealable Area 1 (high coastal resource sensitivity). However, CCC permitting would be needed for any project features that extend into CCC permit jurisdiction or areas of deferred certification<u>the</u> Coastal Zone.

Boundaries of various jurisdictions in the study area, including the City's MHPA, are shown in Figure 1-2. Consistency of the project with requirements of the City's MHPA is discussed in Section 3.1.

As discussed previously, the portion of El Camino Real affected by the proposed project is in the northwestern part of the NCFUA, which encompasses five planning subareas. Subarea boundaries were delineated in the City's NCFUA Framework Plan based on property lines, natural and manmade landscape features, and land use designations. El Camino Real is the eastern boundary for NCFUA Subarea II (San Dieguito). The Pacific Highlands Ranch community, which is Subarea III, lies to the south. The Framework Plan indicates very lowdensity residential development along El Camino Real and Via de la Valle, but notes: "However, sites in these locations are less suitable for residential use than for public and semi-public uses that are also allowed." The Framework Plan also notes that the majority of Subarea II is located within the Coastal Zone. The Framework Plan calls for a single subarea plan to be prepared and adopted for each of the subareas prior to development approval of density greater than one dwelling unit per 10 acres. However, exceptions were made for 250 acres privately held in Subarea II because an independent plan was being developed, and for the privately owned, approximately 26-acre parcel at the southeast quadrant of Via de la Valle and El Camino Real.

The proposed location for wetlands creation to mitigate for El Camino Real Bridge/Road Widening Project impacts to wetlands is immediately west of El Camino Real and adjacent to the south bank of the river. This part of the project is within NCFUA Subarea II. However, lands east of existing El Camino Real are outside of the NCFUA.

The expanded Fairbanks Ranch Country Club Golf Course is directly to the east of El Camino Real, between San Dieguito Road and the San Dieguito River. The Fairbanks Country Club Specific Plan area and Community Planning Area encompasses roughly 785 acres generally south of Via de la Valle and north of Del Mar Heights Road, between Del Mar and Rancho Santa Fe (Figure 1-4). The City Council adopted the Fairbanks Country Club Specific Plan and certified the Environmental Impact Report for the development on March 30, 1982. The Planned Residential Development included 341 units that covered a total of 142 acres east of San Dieguito Road, with the remaining 643 acres designated as open space, and most of that acreage deeded to the City. Except for the privately owned property directly south of Via de la Valle, property east of El Camino Real in the project area, including Polo Club fields and the expanded golf course, lies within the Fairbanks Country Club Specific Plan area. The Carmel Valley Community Planning Area is to the south of the southern end of the proposed project.

1.6.2 Existing and Cumulative Land Use Setting

The City of San Diego 2008 General Plan designates land west of El Camino Real and north of the San Dieguito River as Residential, and the remaining area east and west of the roadway from Via de la Valle to San Dieguito Road as Park, Open Space, and Recreation.

The project area is located in a Special Flood Hazard Area as defined under the San Diego Municipal Code (SDMC; the 100-year floodplain of the San Dieguito River). The Coastal Overlay Zone extends westward from the eastern edge of the existing right of way for El Camino Real, and north of the City-County boundary along Via de la Valle to El Camino Real North.

Existing land uses along El Camino Real between Via de la Valle and San Dieguito Road include commercial, agricultural, recreational, and open space. Specific land uses along the west side of El Camino Real, from north to south, are Mary's Tack and Feed (a commercial establishment), Del Mar Horsepark (an equestrian facility owned by the State of California 22nd District Agricultural Association), and undeveloped/agricultural parcels owned by *Boudreau Trust of 1990* until 2004, when the property west of El Camino Real was purchased by the San Dieguito River Park JPA. Specific land uses along the east side of El Camino Real, from north to south, are a currently undeveloped privately owned property, Polo Club fields owned by the City of San Diego, and the expanded Fairbanks Ranch Country Club golf course, owned by the City of San Diego. These land uses are identified on Figure 1-2. Activities that occur on these lands are discussed in Section 3.1, and include polo matches as well as Surf Cup youth soccer tournaments held on the Polo Club fields. There are several commercial buildings along the north side of Via de la Valle, including restaurants, the Polo Plaza office buildings, Villa Paraiso along Via de la Valle just west of El Camino Real North, and the Casa Palmera elderly care facility at the northeast corner of Via de la Valle and El Camino Real North.

Current zoning for most of the study area properties in the City is AR-1-1 (agriculturalresidential), except for the Horsepark property, polo fields, and golf course, which are zoned OF-1-1 (open space floodplain). The Polo Plaza commercial properties on the north side of Via de la Valle are in the County of San Diego and are zoned C30 (General Commercial Use). Villa Paraiso is in the City and zoned Commercial Office/Open Space-Conservation; Casa Palmera is in the City and zoned Residential.

The combined effects of past, current, and anticipated future projects are referred to as "cumulative impacts." Cumulative impacts are analyzed in Section 4.3 of this EIR. In the project area, one development project and a number of infrastructure projects contribute to the setting for the analysis of cumulative impacts. These projects include planned infrastructure projects such as Via de la Valle Bikeway, Via de la Valle widening west of El Camino Real, and Sewer Pump Station 79 near San Dieguito Road and El Camino Real; the future biological resources restoration on the JPA (former Boudreau) agricultural property west of El Camino Real and south of the river; and development such as the proposed Rancho del Mar senior housing development south of Via de la Valle and east of El Camino Real. These and other more distant projects included in the cumulative analysis are mapped on Figure 4-1. Several projects addressed in the cumulative analysis in the 2006 Draft EIR have since been completed, including Fairbanks Ranch Country Club Golf Course Expansion just east of El Camino Real and south of the river; the San Dieguito Lagoon Wetlands Restoration Project area farther to the west; and the El Camino Real Widening south of San Dieguito Road.

Cumulative development in the project area includes conversion of certain undeveloped property to allowed uses, including golf course and other recreation, with accompanying changes in visual quality, traffic volumes, and water quality for those areas. However, large-scale restoration projects to enhance biological resources in the vicinity, including the completed San Dieguito Lagoon Wetlands Restoration Project and the planned SANDAG/JPA San Dieguito Lagoon W19 Restoration Project, are also part of the cumulative setting. Another cumulative trend in the area is the proposed widening of local roadways to accommodate planned growth in conformance with approved community plans.

1.6.3 Site Topography and Drainage

The project area is generally flat and at relatively low elevations, approximately 5 feet to 30 feet above msl. The elevation of El Camino Real varies from 25 feet above msl at Via de la Valle to 19.5 feet above msl at San Dieguito Road. The road elevation rises and falls from Via de la Valle to the bridge, with two low points at an elevation of approximately 17.5 feet above msl located 1) at the Horsepark driveway and 2) approximately 260 feet south of the driveway. Elevations along Via de la Valle also vary, and drop toward the east to 20.9 feet above msl at the intersection with El Camino Real North.

The San Dieguito River crosses under El Camino Real approximately 1,500 feet south of Via de la Valle. The river channel is about 250 feet wide at this location. Downstream of El Camino Real bridge, the river continues about 3 miles westward to San Dieguito Lagoon and the Pacific Ocean near the Del Mar Fairgrounds.

Most of El Camino Real within the study area is in the 100-year floodplain of the San Dieguito River, as are the lands east and west of the road in this location. The existing 100-year floodplain covers the majority of the valley floor including Polo Club fields and portions of Horsepark. During the peak flow of a 100-year flood, hydraulic modeling indicates water flows across the Polo Club fields and Horsepark properties, crossing the road at the low points mentioned above. The 100-year water surface elevation was estimated to be at 21.3 feet above msl along El Camino Real. The 100-year flow would also overtop a portion of Via de la Valle around El Camino Real North and extend northward on El Camino Real North, where the 100-year flood elevation would be approximately 22.5 feet above msl.

An open drainage channel runs along the south edge of Via de la Valle between El Camino Real and El Camino Real North. This channel turns southward, where it widens and parallels the eastern side of El Camino Real to the San Dieguito River. The drainage channel along the southern edge of Via de la Valle is in private property. The drainage channel along the eastern edge of El Camino Real is partly in the same private property, and is in a narrow parcel owned by the State of California 22^{nd} District Agricultural Association where the drainage channel parallels the Polo Club fields.

1.6.4 Existing Vegetation

Biological surveys have been conducted for the project in accordance with regulatory requirements, and potential impacts to biological resources are discussed in detail in Section 3.12. Vegetation communities identified in the study area include Diegan coastal sage scrub, mulefat scrub, southern willow scrub, freshwater marsh, and salt marsh. Open water occurs in the San Dieguito River. This area alternates seasonally between open water and freshwater marsh, depending on water flow. No California gnatcatchers were detected during the field surveys. Focused surveys conducted in spring of 2004 for clapper rail, a federally and state listed

endangered bird, established the presence of multiple pairs of these birds in the San Dieguito River adjacent to the bridge and upstream (east) of the bridge. Impacts to wetlands would occur for all build alternatives. These impacts include permanent impacts due to road widening to freshwater marsh and emergent wetland in the open ditch parallel to the east edge of El Camino Real, and freshwater marsh in the open ditch parallel to the south edge of Via de la Valle. There would also be permanent and temporary impacts due to bridge construction to mulefat scrub, southern willow scrub, and freshwater marsh in the San Dieguito River. Wetlands in the bridge construction zone west of the eastern edge of existing El Camino Real lie in the Coastal Overlay Zone and the City's MHPA.

1.6.5 Police Protection Services

Updated information regarding police service provided by the San Diego Police Department (Wahl 2014) for the recirculated EIR is summarized below.

Police service for the El Camino Real Bridge/Road Widening Project will be provided by officers from Northwestern Division located at 12592 El Camino Real in San Diego. The project is located on beat 935 in the City of San Diego. Northwestern Division provides police service to the following communities: Sorrento Valley, Torrey Preserve, Del Mar Heights, Carmel Valley, North City, Torrey Highlands and Black Mountain Ranch. The San Diego Police Department has mutual aid agreements with all other Law Enforcement Agencies in San Diego County.

Northwestern Division is currently staffed with 62 sworn personnel and 1 civilian employee. Officers work ten-hour shifts. Staffing is comprised of three shifts which operate from 6:00 A.M. - 4:00 P.M. (First Watch), 2:00 P.M. - midnight (Second Watch) and from 9:00 P.M. - 7:00 A.M. (Third Watch). Using the Department's recommended staffing guidelines, Northwestern Division currently deploys a minimum of four officers on First Watch, four officers on Second Watch and four officers on Third Watch.

The San Diego Police Department does not staff individual stations based on ratios of sworn officers per 1,000 population ratio. The goal citywide is to maintain 1.48 officers per 1,000 population ratio.

The Department currently utilizes a five level priority calls dispatch system, which includes priority "E" (Emergency), one, two, three and four. The calls are prioritized by the phone dispatcher and routed to the radio operator for dispatch to the field units. The priority system is designed as a guide, allowing the phone dispatcher and the radio dispatcher discretion to raise or lower the call priority as necessary based on the information received. Priority "E" and priority one calls involve serious crimes in progress or those with a potential for injury. Priority two calls include vandalism, disturbances, and property crimes. Priority three includes calls after a crime has been committed such as cold burglaries and loud music. Priority four calls include parking complaints or lost and found reports.

The El Camino Real Bridge/Road Widening Project is located in the City of San Diego within the boundaries of police beat 935. The 2013 response times for beat 935 were 8.5 minutes for emergency calls, 13.2 minutes for priority one calls, 17.2 minutes for priority two calls, 45.7 minutes for priority three calls, and 116.5 minutes for priority four calls. The citywide average response times, for the same period, were 6.6 minutes for emergency calls, 11.7 minutes for priority two calls, 27.4 minutes for priority two calls, 68.9 minutes for priority three calls and 70.9 minutes for priority four calls during that same time period. The Department strives to

maintain the response time goals as one of various other measures used to assess the level of service to the community.

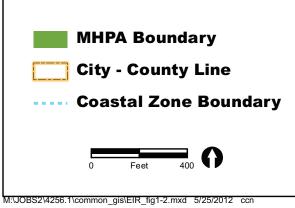
The Department is currently reaching its targeted staffing ratio of 1.48 sworn officers per 1,000 residents based on 2013 estimate residential population of 1,311,882. The ratio is calculated to take into account all support and investigative positions within the Department. This ratio does not include the significant population increase resulting from citizens who commute to work from outside of the city of San Diego or those visiting.

There are no current plans for additional police substations in the immediate area. Police response times in this community will continue to increase with the build-out of community plans and the increase of traffic generated by new growth. A Crime Prevention through Environmental Design (CPTED) review is recommended by the Department to address general security concerns.

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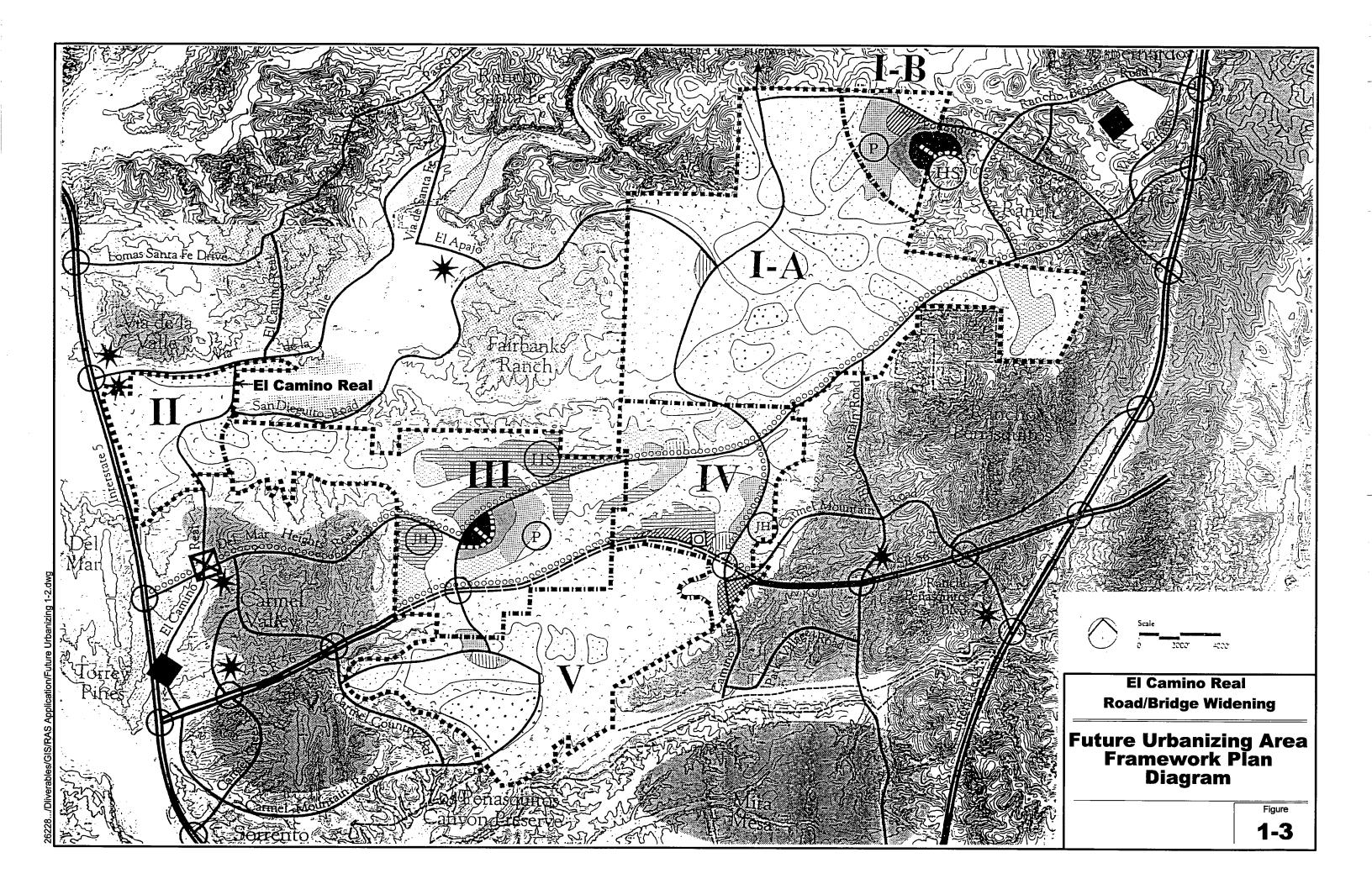


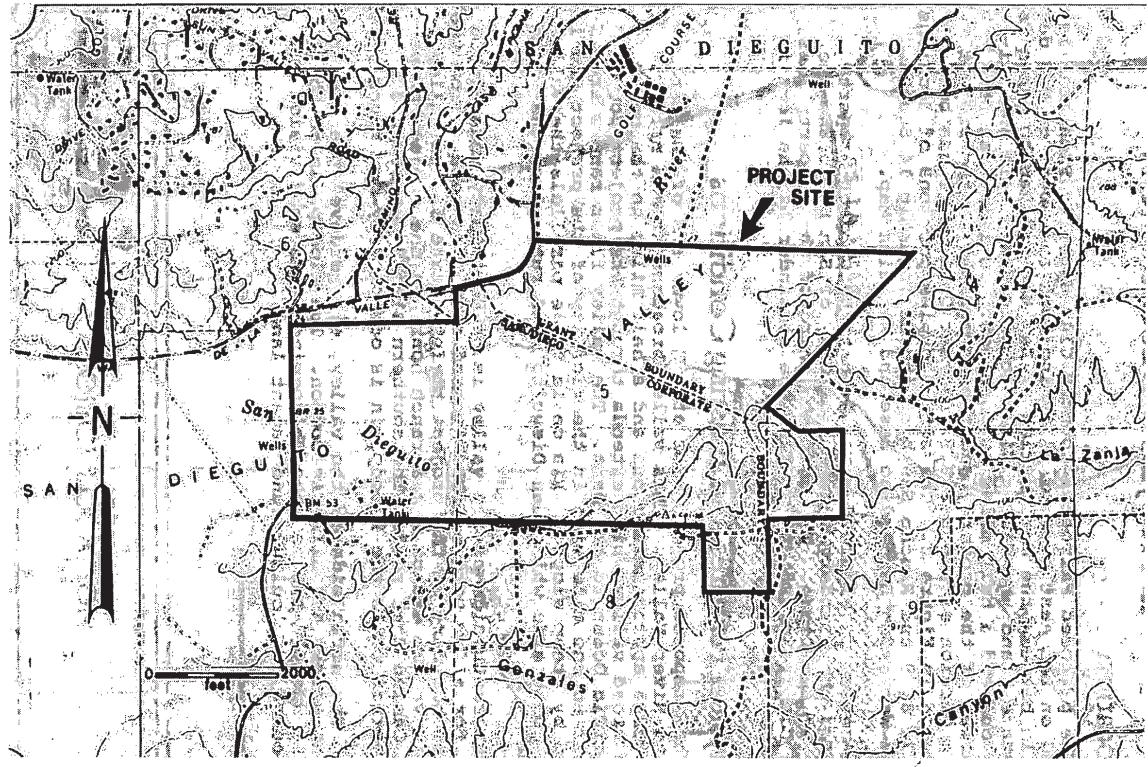
El Camino Real Road/Bridge Widening

Project Study Area

Figure

1-2





Source: WATT Industries of San Diego, 1982

El Camino Real Road/Bridge Widening

Fairbanks Country Club Specific Plan Area

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Figure

1-4

SECTION 2 PROJECT DESCRIPTION

2.1 PROJECT GOALS AND OBJECTIVES (PURPOSE)

The road being modified is the segment of El Camino Real that runs from Via de la Valle on the north to San Dieguito Road on the south. This portion of El Camino Real is approximately 2,400 feet long, 23 feet wide, has one travel lane in each direction, and has no shoulders, bike lanes, or pedestrian walkways. The road segment includes a bridge over the San Dieguito River that is 340 feet long and 27 feet wide (24 feet wide curb to curb on the concrete travel surface, with 1.5-foot-wide raised concrete curbs on each side). The bridge is not high enough to completely pass the 100-year flood. The City proposes to modify the segment of El Camino Real between Via de la Valle and San Dieguito Road and replace the bridge in order to improve the structural integrity of the bridge over the San Dieguito River, alleviate problems associated with high flood events, improve pedestrian and vehicular access to nearby coastal and recreational resources, relieve traffic congestion, and improve consistency with the adopted land use plan and adopted Circulation Element in the project area. Via de la Valle from the intersection of existing El Camino Real eastward to El Camino Real North also would be widened to accommodate the proposed new configuration of El Camino Real. See Sections 1.2 and 1.3 for a detailed discussion of the project goals and objectives (purpose) and need.

2.2 ALTERNATIVES ANALYZED IN DETAIL

Seven build alternatives are analyzed at an equal level of detail in Section 3 of this EIR. Each of these alternatives represents "the project" and is described in this section of the EIR.

Multiple alignment and configuration alternatives were studied in detail in order to facilitate consistency with a separate environmental document being prepared about this project to satisfy the NEPA. As discussed in Section 1, federal funding has been requested from and has been obligated by the FHWA for improvements to the bridge through the HBRR program (now the HBP). Because FHWA, a federal agency, must make a discretionary decision about this project, NEPA must be satisfied as well as CEQA. Caltrans is acting as the agent for FHWA and is providing oversight for the NEPA process. A separate EA that meets the guidelines of FHWA and Caltrans is being prepared to satisfy NEPA. Under NEPA, viable alternatives must be discussed in equal detail.

Section 15126.6 of the CEQA Guidelines requires that an EIR "shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible."

This section of the EIR describes the design alternatives that were developed by a multidisciplinary team to substantially achieve the project purpose and need while avoiding or minimizing environmental impacts. The build alternatives analyzed in detail in this EIR are the following:

- Central Alignment Alternative
- Road Capacity Alternative
- Bicycle Safety Alternative
- Western Alignment Alternative
- Eastern Alignment Alternative
- Roundabout Alternative
- Lower Elevation Alternative

The No Build (No Project) Alternative is also evaluated in this EIR. This alternative represents the circumstance under which the El Camino Real Bridge/Road Widening Project modifying the segment of El Camino Real from Via de la Valle to San Dieguito Road does not proceed.

It should be noted that the two alternatives with the "narrow roadway" cross section analyzed in detail in this EIR are not considered viable by FHWA, and would not be funded by the HBP. These are the Road Capacity Alternative and the Bicycle Safety Alternative. Caltrans/FHWA does not consider these alternatives viable because they do not provide all features needed to completely meet the purpose and need, as described below, and consequently, these two alternatives are not analyzed in the EA. However, as noted in CEOA Guidelines Section 15126.6(a), a range of reasonable alternatives which would "feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project" should be described in an EIR. The narrow roadway alternatives are analyzed in detail in this recirculated EIR in order to facilitate a complete evaluation of the comparative merits of the alternatives (see Section 5), including the two that have the narrowest right-of-way possible, for informed decision-making about the project. This detailed analysis is also anticipated to be helpful for various permitting agencies, including the California Coastal Commission. But if either of these alternatives were selected, funding for the bridge independent of the proposed federal funding would have to be obtained by the City. The federal funding is estimated to be approximately \$15 to \$20 million. In addition, the detailed comparison in Section 5 demonstrates that the narrow roadway alternatives would not be environmentally superior or be preferred by the City. In addition, the Lower Elevation Alternative is not analyzed separately in the EA because it has the same configuration as the Central Alignment.

Other alternatives were considered, but it was determined that they would not attain most of the basic objectives of the project, or they would not avoid or substantially lessen any of the significant effects of the project, or were infeasible. The alternatives that were considered but rejected without detailed environmental evaluation in Section 3 are discussed in Section 5 of this recirculated EIR. These alternatives include the design alternatives recommended by the Western San Dieguito River Valley/NCFUA Subarea II Task Force in February 2007.

2.2.1 Summary of Common Project Features

All of the build alternatives analyzed in detail in this EIR would provide the following key components:

- The roadway of El Camino Real would be raised on fill above the 100-year flood level between San Dieguito Road and Via de la Valle and would meet existing grade at these locations.
- The bridge over the San Dieguito River would be demolished and replaced with a new structure that would be approximately the same length as the existing bridge and raised above the 100-year flood level. The new bridge would be supported on bridge piles that

would have a continuous cylindrical shape about 7 feet in diameter, and would extend to a depth of approximately 90 feet below the ground. The piles would be cast-in-drilledhole, meaning they would be constructed using drilling technology, not by pile driving. Above the ground, the piles would become cylindrical finished concrete columns (piers) about 5 feet in diameter. Abutments at the bridge would be protected from erosion by riprap, and the bank slope at the new bridge would be steepened to be approximately 1.5:1. The south bank of the river is currently protected by a buried stabilization system, and the river bed under and upstream of the existing bridge is protected by a rip rap blanket. As mitigation for higher 100-year velocities with the project, the unprotected north bank upstream of the bridge would be similarly protected (see Section 3.7).

- Via de la Valle would be widened to its ultimate width from the modified intersection with El Camino Real eastward to El Camino Real North. The existing dual reinforced concrete pipe (RCP) storm drain culvert under Via de la Valle near El Camino Real North would be replaced with an underground triple reinforced concrete box (RCB) sized to pass the 100-year peak storm event from the upstream tributary north of Via de la Valle onto the property south of Via de la Valle. The 100-year peak storm event from the upstream one-square-mile drainage area is approximately 680 cubic feet per second (cfs). Large storm events would continue to flow overland in a southerly direction towards the San Dieguito River. A low-flow storm drain would be constructed within widened Via de la Valle to convey nuisance flows from the upstream edge of the proposed culvert system at El Camino Real North to the existing ditch just east of El Camino Real.
- Project impacts to wetlands would be mitigated by enhancement and creation on the JPA Mitigation Site west of the affected portion of El Camino Real (see Section 3.7 and Section 3.12). The Roundabout Alternative would require additional acreage of wetland mitigation beyond the JPA Mitigation Site. Additional suitable mitigation opportunities exist within the project vicinity; therefore, additional off-site mitigation would be achievable for the Roundabout Alternative on a site owned by the City.

Design criteria applied to the project include the City of San Diego Street Design Manual, the Caltrans Highway Design Manual, and the AASHTO Manual, A Policy on Geometric Design of Highways and Streets. El Camino Real and Via de la Valle are classified as being four lane major roadways in the future. The design criteria used for the conceptual design of the segments of these roads that constitute the project analyzed in this EIR are as follows:

- **Design Speed** 55 miles per hour
 - Minimum Radius 1,250 feet with 4 percent superelevation
- . Minimum Grade 0.5 percent

The posted speed for widened El Camino Real and Via de la Valle may be different from the design speed. However, the posted speed cannot be determined before the facility is in operation. After the project is completed, the City will resurvey the roadway traffic and set the posted speed limits based on the factors determined by that survey, including but not limited to the 85th percentile speed. The posted speed would not exceed the design speed. Specific features of each of the build alternatives are described below. A summary of key characteristics of the build alternatives is presented in Table 2-1.

Characteristic /	Central	Road	Bicycle	Western	Eastern	Roundabout	Lower
Impact	Alignment	Capacity	Safety	Alignment	Alignment		Elevation
Number of travel	4	4	2	4	4	4	4
lanes							
Bicycle lanes	Yes	No	Yes	Yes	Yes	Yes	Yes
Walkway/Parkway	Yes	No	No	Yes	Yes	Yes	Yes
Median width	4 feet	2 feet	14 feet	4 feet	4 feet	4 feet	4 feet
beyond							
intersections							
Turn pockets at	Yes	No	Yes	Yes	Yes, plus	Roundabouts	Yes
Horsepark and					frontage	plus frontage	
Mary's Tack &					U		
Feed							
Retaining walls	No	Yes	Yes	No	No	No	No
Road embankment	2:1	None	None	2:1	2:1	2:1	2:1
slope		(vertical)	(vertical)				
Total road width	104 feet	60 feet	60 feet	104 feet	104 feet	104 feet	104 feet
(without slope							
easement)							
JPA under	Yes	Yes	Yes	Yes	Yes	Yes	No
crossing above							
10-year flood							
under north bridge							
abutment							
Cantilever multi-	Yes	Yes	Yes	Yes	Yes	Yes	Yes
use trail on bridge	100	1.05	1.00	100	1.05		1.05
Total bridge width	76 feet	57 feet	57 feet	76 feet	76 feet	76 feet	76 feet
Height of bridge	25 feet	25 feet	25 feet	25 feet	25 feet	25 feet	22 feet
surface above	25 1001	25 1000	25 1000	25 1000	25 1000	25 1001	22 1000
channel bottom							
Height that new	6 feet	6 feet	6 feet	6 feet	6 feet	6 feet	3 feet
bridge would be	0 1001	0 1001	0 1000	0 1001	0 1000	0 1001	5 1000
above the height							
of the existing							
bridge							
Number of bridge	Eight	Four	Four	Eight	Six	Six	Eight
piers	(two sets of	(two sets	(two sets	(two sets of	(two sets of	(two sets of	(two sets
Piers	four)	of two)	of two)	four)	(two sets of three)	(two sets of three)	of four)
Breeding seasons	Three	Three	Three	Three	Two	Two	Three
spanned for	111100	111100	111100	111100	IWU	IWU	111100
construction							
construction							

 Table 2-1

 Summary of Key Characteristics of Build Alternatives

2.2.2 El Camino Real Cross Sections and Features

Each alternative for modifying El Camino Real would have one of two basic cross section designs: a full widened roadway, or a narrow roadway. The different cross sections would provide different features in terms of number and width of vehicle travel lanes, bicycle lanes, center median, and pedestrian walkways.

2.2.2.1 Full Widened Roadway Cross Section

The full widened roadway cross section for El Camino Real would be a total of 104 feet wide and would have the following elements, from one side to the other (Figure 2-1), with the widths listed:

Pedestrian walkway/parkway	22 feet
Bicycle lane	6 feet
Outside travel lane	11 feet
Inside travel lane	11 feet
Median (solid, raised)	4 feet
Inside travel lane	11 feet
Outside travel lane	11 feet
Bicycle lane	6 feet
Pedestrian walkway/parkway	22 feet
Total width for El Camino Real	
full widened roadway cross section	104 feet

The El Camino Real full widened roadway cross section would apply to the following alternatives:

- Central Alignment Alternative
- Western Alignment Alternative
- Eastern Alignment Alternative
- Roundabout Alternative
- Lower Elevation Alternative

2.2.2.2 Narrow Roadway Cross Sections

The El Camino Real narrow roadway cross sections would be 60 feet wide, and would apply to the following alternatives:

- Road Capacity Alternative
- Bicycle Safety Alternative

The characteristics of the cross section would vary within the 60-foot width for these two alternatives, as discussed below.

Road Capacity Alternative. The Road Capacity Alternative would feature four travel lanes and a narrow painted (striped) median. For this alternative, the El Camino Real narrow roadway cross section would have the following elements, from one side to the other (Figure 2-2) with the widths listed:

Graded shoulder	3 feet
Outside travel lane	14 feet
Inside travel lane	12 feet
Median (striped)	2 feet
Inside travel lane	12 feet
Outside travel lane	14 feet
Graded shoulder	3 feet
Total width for El Camino Real	
narrow roadway cross section	
(Road Capacity Alternative)	60 feet

This alternative would not provide pedestrian walkways, a parkway, or bicycle lanes.

Bicycle Safety Alternative. The Bicycle Safety Alternative would feature two travel lanes, bicycle lanes and a raised central median. For this alternative, the El Camino Real narrow roadway cross section would have the following elements, from one side to the other (Figure 2-3) with the widths listed:

Graded shoulder	3 feet
Bicycle lane	8 feet
Inside travel lane	12 feet
Median (raised)	14 feet
Inside travel lane	12 feet
Bicycle lane	8 feet
Graded shoulder	3 feet
Total width for El Camino Real	
narrow roadway cross section	
(Bicycle Safety Alternative)	60 feet

This alternative would not provide pedestrian walkways, a parkway, or additional travel lanes to increase road capacity.

2.2.3 Via de la Valle Cross Section and Features

For all build alternatives, Via de la Valle would be widened to its ultimate width from the modified intersection with El Camino Real eastward to El Camino Real North. The cross section for Via de la Valle would have the following elements, from the north side (existing curb line) to the south side (Figure 2-4) with the widths listed:

Bicycle lane	6 feet
Outside travel lane	11 feet
Inside travel lane	11 feet
Median (raised)	14 feet
Inside travel lane	11 feet
Outside travel lane	11 feet
Bicycle lane	6 feet
Pedestrian walkway/parkway	<u>22 feet</u>
Total width for Via de la Valle	
roadway cross section	
(all alternatives)	92 feet

The existing sidewalk along the north side of Via de la Valle would remain. All modifications to Via de la Valle would extend southward from the existing north edge of the roadway.

2.2.4 El Camino Real Alignments and Profiles

The horizontal location of each build alternative was varied in relation to the existing alignment of El Camino Real to address different issues related to neighboring properties, as described below.

2.2.4.1 Central Alignment Alternative

Horizontal Location. The Central Alignment Alternative (Figure 2-5) would have a full widened roadway cross section roughly centered on the existing alignment of El Camino Real. This alternative would impact neighboring properties on the east and west sides relatively equally.

Vertical Profile and Bridge Height. El Camino Real would be raised on embankment with 2:1 side slopes. The proposed profile of modified El Camino Real is shown in the alignment graphic. The widened roadway profile would vary generally from 5 feet to 10 feet above the existing elevation of El Camino Real, and would meet existing grade at the northern end of the project at Via de la Valle and at the southern end of the project at San Dieguito Road. The modified roadway would be raised above the current elevation mostly because the bridge would be higher and design standards for vertical curves and sight distance determine the profile between the bridge high point and where the road can meet existing grade. The higher roadway set by design standards also accomplishes 100-year flood protection for the road from the bridge north to vapproximately 100 feet south of the Horsepark entrance. From this point, north to Via de la Valle, the existing road would need to be raised higher to achieve 100-year flood protection than needed to meet vertical design standards.

The new bridge would be high enough to provide an elevated multi-use trail under crossing set at the 10-year flood level under the north bridge abutment. The 10-year flood elevation is approximately 13 feet above msl at this location. The platform would allow 12 feet of clearance between the trail surface and the underside of the bridge for equestrians, in accordance with JPA requirements. The underside of the bridge would be at an elevation of approximately 25 feet above msl. This is approximately 6 feet above the height of the existing bridge.

2.2.4.2 Road Capacity Alternative

Horizontal Location. The Road Capacity Alternative (Figure 2-6) would have a narrow roadway cross section with an alignment shifted west. This alternative would avoid impacts to the wetlands in the drainage ditch parallel to the eastern edge of El Camino Real.

Vertical Profile and Bridge Height. El Camino Real for the Road Capacity Alternative would be raised on fill with vertical retaining walls on both sides, in order to keep the cross section as narrow as possible. The narrow roadway profile would vary generally from 5 feet to 10 feet above the existing elevation of El Camino Real, and would meet existing grade at Via de la Valle and at San Dieguito Road, as described for the Central Alignment Alternative. An elevated multi-use trail under crossing set at the 10-year flood level would be provided under the north bridge abutment as described for the Central Alignment Alternative.

2.2.4.3 Bicycle Safety Alternative

Horizontal Location. The Bicycle Safety Alternative (Figure 2-7) would have a narrow roadway cross section with an alignment shifted west. This alternative would avoid impacts to the wetlands in the drainage ditch parallel to the eastern edge of El Camino Real, identical to the Road Capacity Alternative.

Vertical Profile and Bridge Height. El Camino Real for the Bicycle Safety Alternative would be raised on fill with vertical retaining walls on both sides, in order to keep the cross section as narrow as possible. The narrow roadway profile would vary generally from 5 feet to 10 feet above the existing elevation of El Camino Real, and would meet existing grade at Via de la Valle and at San Dieguito Road, as described for the Central Alignment Alternative. An elevated multi-use trail under crossing set at the 10-year flood level would be provided under the north bridge abutment as described for the Central Alignment Alternative.

2.2.4.4 Western Alignment Alternative

Horizontal Location. The Western Alignment Alternative (Figure 2-8) would have a full widened roadway cross section with an alignment shifted west. This alternative would avoid impacts to the wetlands in the drainage ditch parallel to the eastern edge of El Camino Real.

Vertical Profile and Bridge Height. El Camino Real would be raised on embankment with 2:1 side slopes. The widened roadway profile would vary generally from 5 feet to 10 feet above the existing elevation of El Camino Real, and would meet existing grade at Via de la Valle and at San Dieguito Road, as described for the Central Alignment Alternative. An elevated multi-use trail under crossing set at the 10-year flood level would be provided under the north bridge abutment as described for the Central Alignment Alternative.

2.2.4.5 Eastern Alignment Alternative

Horizontal Location. The Eastern Alignment Alternative (Figure 2-9) would have a full widened roadway cross section with an alignment shifted to the east side of the existing drainage ditch parallel to the eastern edge of El Camino Real. This alternative would allow independent construction of the bridge, minimize impacts to developed properties along the western side of El Camino Real (Horsepark and Mary's Tack and Feed), and reduce impacts to wetlands in the drainage ditch parallel to the eastern edge of El Camino Real. The alignment for this alternative would be shifted eastward to where the toe of the new road western embankment would tie in along the existing Polo Club fence. The design radius would be 2,000 feet with no superelevation from the bridge south, and gentle back-to-back "S" curves with radii of 1,850 feet north of the bridge to Via de la Valle.

Vertical Profile and Bridge Height. El Camino Real would be raised on embankment with 2:1 side slopes. The widened roadway profile would vary generally from 5 feet to 10 feet above the existing elevation of El Camino Real, and would meet existing grade at the northern end of the project on Via de la Valle at De la Valle Place and at the southern end of the project at San Dieguito Road. The northern intersection location is to the east of the location for the alternatives described above, but the profile would be generally the same. An elevated multi-use trail under crossing set at the 10-year flood level would be provided under the north bridge abutment as described for the Central Alignment Alternative.

2.2.4.6 Roundabout Alternative

Horizontal Location. The Roundabout Alternative (Figure 2-10) would have a full widened roadway cross section with an alignment shifted east similar to the Eastern Alignment Alternative. Roundabouts instead of signalized intersections would be located where El Camino Real meets San Dieguito Road, the Polo Field/Horsepark driveways, and De la Valle Place, and where Via de la Valle meets El Camino Real North. The footprint of the Roundabout Alternative would be larger than for the Eastern Alignment Alternative due to the need for transitions eastward and northward at the intersection of Via de la Valle and El Camino Real North, as well as at El Camino Real and San Dieguito Road and the need for additional area to accommodate the roundabouts compared to typical intersections. At the intersection of Via de la Valle to allow appropriate transitions to the existing roadways. At the intersection of El Camino Real and San Dieguito Road to allow appropriate transitions to those existing roadways.

Vertical Profile and Bridge Height. El Camino Real would be raised on embankment with 2:1 side slopes. The widened roadway profile would vary generally from 5 feet to 10 feet above the existing elevation of El Camino Real, and would meet existing grade at De la Valle Place and at San Dieguito Road as described for the Eastern Alignment Alternative. The profile would be generally the same as for the Eastern Alignment Alternative. An elevated multi-use trail under crossing set at the 10-year flood level would be provided under the north bridge abutment as described for the Central Alignment Alternative.

2.2.4.7 Lower Elevation Alternative

Horizontal Location. The Lower Elevation Alternative (Figure 2-11) would have a full widened roadway cross section roughly centered on the existing alignment of El Camino Real, similar to the Central Alignment Alternative. The Lower Elevation Alternative would impact neighboring properties on the east and west sides relatively equally.

Vertical Profile and Bridge Height. El Camino Real would be raised on embankment with 2:1 side slopes. However, the Lower Elevation Alternative would be approximately 3 feet lower in vertical alignment than the other alternatives because this alternative would set the bridge elevation at just the elevation needed to clear the 100-year flood, and would not provide the JPA multi-use trail under crossing. The bridge for the Lower Elevation Alternative would be approximately 3 feet above the height of the existing bridge.

2.2.5 Via de la Valle Alignment

The segment of Via de la Valle east of widened El Camino Real would need to be widened to allow for effective transitions to the two-lane portion of Via de la Valle. All widening on Via de la Valle would be accomplished to the south, with appropriate arrangement of compensation to the private property owner, to be negotiated upon completion of the environmental process and selection of the alternative for final design.

A plan of Via de la Valle representative for all of the alternatives except the Eastern Alignment Alternative and Roundabout Alternative is in Figure 2-12. A plan of the Via de la Valle widening for the Eastern Alignment, which would meet Via de la Valle at the intersection with De la Valle Place instead of the current "T" intersection of El Camino Real and Via de la Valle, is in Figure 2-13. A plan of the Via de la Valle widening for the Roundabout Alternative is in Figure 2-14.

2.2.6 Intersection Configurations

For all of the build alternatives except the Eastern Alignment Alternative and Roundabout Alternative, the main intersection of El Camino Real and Via de la Valle would occur at the existing location. For the Eastern Alignment Alternative and Roundabout Alternative, the main intersection of modified El Camino Real and Via de la Valle would be shifted to the east, and would line up with De la Valle Place. For all alternatives, the north side of the intersection of El Camino Real and San Dieguito Road would be modified but remain in the same location. As noted above, the intersections for the Roundabout Alternative would be unsignalized roundabouts instead of typical intersections. The operational performance of the various intersection configurations is addressed in Section 3.2.

2.2.6.1 El Camino Real and Via de la Valle

The proposed configuration of turning and through lanes at El Camino Real and Via de la Valle for all alternatives with the full widened roadway cross section except for the Eastern Alignment Alternative and Roundabout Alternative is shown in Figure 2-15. Approaching Via de la Valle on El Camino Real northbound, there would be a left-turn lane and a left-through lane to Via de la Valle westbound (with the easternmost left-turn also being a through lane), and one right-turn lane to Via de la Valle eastbound. For these full widened roadway alternatives, vehicles could go into the restaurant driveway from the left-through lane.

Approaching El Camino Real eastbound on Via de la Valle, there would be a through/right-turn lane to southbound El Camino Real, a through lane to continue eastward on Via de la Valle, and one left-turn lane to the driveway into the commercial area on the north side of Via de la Valle. A dedicated right and eastbound through lane would be needed to provide full improvements at this intersection, but there is not sufficient room for the additional lane without affecting the north boundary of Mary's Tack and Feed for the Central, Western, and Lower Elevation alternatives, as discussed in Section 3.2. Approaching El Camino Real westbound on Via de la Valle, there would be two left-turn lanes to southbound El Camino Real, a through lane, and a right-through lane. For the full widened roadway alternatives, vehicles could turn right into the commercial area parking lot from the right-through lane.

For the narrow roadway alternatives, the intersection configuration of El Camino Real would be slightly different, although Via de la Valle would maintain the same widened configuration of the other build alternatives. For the Road Capacity Alternative (four travel lanes, no usable median), northbound El Camino Real would be striped with the easternmost lane being a right-through lane to eastbound Via de la Valle and the commercial driveway, and the westernmost lane being a left-turn lane to westbound Via de la Valle. The southbound side of El Camino Real would have two through lanes. For the Bicycle Safety Alternative (two travel lanes, 14-foot median, and bike lanes), the northbound lane of El Camino Real would be striped as a combined left-through-right. The southbound side of El Camino Real would have one through lane.

2.2.6.2 El Camino Real and Via de la Valle/De la Valle Place (Eastern Alignment Alternative)

For the Eastern Alignment, the lane configuration at the new intersection of El Camino Real and Via de la Valle/ De la Valle Place would be as shown in Figure 2-16. On El Camino Real

approaching Via de la Valle, there would be a left-turn lane and a left-through lane to Via de la Valle westbound, with the easternmost left-turn lane allowing through travel to De la Valle Place. There would be a right-turn lane to Via de la Valle eastbound.

Approaching El Camino Real eastbound on Via de la Valle, there would be one right-turn lane to southbound El Camino Real, two through lanes, and one left-turn lane to De la Valle Place. The dedicated right-turn lane would not extend west of existing El Camino Real. Approaching El Camino Real westbound on Via de la Valle, there would be two left-turn lanes to southbound El Camino Real, a through lane, and a right-through lane, with a right-turn allowed onto De la Valle Place from the right-through lane.

For this alternative, the existing intersection of El Camino Real and Via de la Valle would be modified to terminate El Camino Real on the south side of the intersection.

2.2.6.3 El Camino Real and Via de la Valle/De la Valle Place (Roundabout Alternative)

For the Roundabout Alternative, the lane configuration at the new intersection of El Camino Real and Via de la Valle/ De la Valle Place would consist of a two-lane unsignalized roundabout as shown in Figure 2-17.

2.2.6.4 El Camino Real and San Dieguito Road

The proposed configuration of turning and through lanes at El Camino Real and San Dieguito Road for all alternatives with the full widened roadway cross section except the Roundabout Alternative is shown in Figure 2-18. Approaching San Dieguito Road on southbound El Camino Real, there would be two left-turn lanes to eastbound San Dieguito Road, and two through lanes. The turn pocket at San Dieguito Road to allow El Camino Real southbound traffic to turn left onto eastbound San Dieguito Road in two dedicated lanes would have a storage length of approximately 230 feet.

For the narrow roadway alternatives, the north side of the intersection would be striped with a left-turn and a through lane on the southbound side of El Camino Real for the four-lane Road Capacity Alternative. The north side of the intersection would be striped with a combination left and through lane on the southbound side of El Camino Real for the two-lane Bicycle Safety Alternative.

On the improved south side of the intersection, El Camino Real currently consists of four lanes with bike lanes, a raised center median, plus a sidewalk on the east side of the road. At the intersection, there is a left pocket for drivers travelling north on El Camino Real to make a U-turn and go south on El Camino Real. On the north side of the intersection, there is a single left pocket for drivers travelling south on El Camino Real to turn left onto eastbound San Dieguito Road. On the east side of the intersection, there are two dedicated left-turn lanes on San Dieguito Road for drivers to go south on El Camino Real and a dedicated right-turn lane for drivers to go north on El Camino Real.

Only the north side of the intersection at El Camino Real and San Dieguito Road would be constructed as part of the proposed project. The modifications to existing El Camino Real south of the intersection and to San Dieguito Road east of the intersection are a separate project (El Camino Real Road Widening Project No. 145081.2) that was evaluated in a separate environmental document. The modifications to the south and east have been completed.

For the Roundabout Alternative, the existing intersection would be modified to consist of an unsignalized two-lane roundabout.

2.2.6.5 Via de la Valle and El Camino Real North

The proposed configuration of turning and through lanes at Via de la Valle and El Camino Real North for all alternatives except the Roundabout Alternative is shown in Figure 2-19a. Approaching the intersection of Via de la Valle and El Camino Real North, the road would be striped to have one eastbound through lane, one left-turn lane to El Camino Real North, and one westbound through lane. No changes would be made to El Camino Real North. This is called the interim intersection lane configuration, and would be striped to match existing pavement on the east side of the intersection. An ultimate intersection lane configuration at El Camino Real North is presented in Figure 2-19b for information purposes only. This future configuration would depend on future decisions regarding road widening east of the intersection, which are not proposed as part of this project.

For the Roundabout Alternative, the existing intersection would be modified to consist of an unsignalized two-lane roundabout.

2.2.7 Access

2.2.7.1 Access with Most Build Alternatives

For all build alternatives except the Road Capacity Alternative, the Eastern Alignment Alternative, and the Roundabout Alternative, a new signalized intersection would be created with left-turn lanes for northbound and southbound traffic to access Horsepark and the existing Polo Club fields, respectively. The signal would remain green for through traffic until a vehicle in a left-turn lane triggers the signal, or a pedestrian or equestrian wanting to cross the street presses the walk controls. Controls at pedestrian level and at a higher level within convenient reach of a horseback rider would be provided at the Horsepark entrance and at the Polo Club fields entrance on the opposite side of El Camino Real. These controls and the left-turn lanes would be provided for the Bicycle Safety Alternative, even though there would only be two travel lanes.

A median break would be provided from the left-turn lane of northbound El Camino Real approaching Via de la Valle to allow left turns into Mary's Tack and Feed. This median break is proposed because otherwise, once a raised median is in place along El Camino Real, drivers including large trucks hauling hay and horses along northbound El Camino Real would be prevented from turning left into the driveway. However, drivers leaving Mary's Tack and Feed driveway would only be able to turn right onto southbound El Camino Real.

2.2.7.2 Access with the Road Capacity Alternative

The Road Capacity Alternative would only have a striped, 2-foot-wide median. For this alternative, there is no room for a turn pocket at intersections. Therefore, the Road Capacity Alternative could not accommodate turn pockets or a new intersection at the Horsepark and Polo Club driveways. Only right turns in and out of driveways along El Camino Real would be allowed. The left lane of northbound El Camino Real would become a dedicated left-turn lane at the intersection with Via de la Valle.

2.2.7.3 Access with the Eastern Alignment Alternative

Access to various properties would change with this alternative. On the north side of Via de la Valle, access would become more restricted at the lower commercial parking lot, but more controlled at De la Valle Place. With the existing intersection of El Camino Real and Via de la Valle a dead-end on the south, turning movements would be restricted at the commercial development lower parking lot driveway that lines up with existing El Camino Real. Right turns in and out would be the only movements allowed because the existing signal would be eliminated and existing El Camino Real to the south would be closed. However, the upper parking lot for the commercial development would still access out to De la Valle Place, and drivers would have a more regulated intersection at this street with the proposed signalization. Drivers to the gated residential development would also have a more regulated intersection.

To address changes in access for businesses along Via de la Valle, U-turns would be allowed at the following locations: Via del Canon/Via de la Valle for westbound traffic on Via de la Valle to return east (part of the separate City project for widening Via de la Valle west of existing El Camino Real); El Camino Real/De la Valle Place for eastbound traffic on Via de la Valle to return west (part of this proposed project); and El Camino Real/De la Valle Place for westbound traffic on Via de la Valle to return east (part of this proposed project); U-turns could also be accommodated at the modified intersection of El Camino Real North/Via de la Valle for eastbound traffic on Via de la Valle to return west as part of this proposed project with some modifications to the proposed interim condition striping and additional pavement widening east of El Camino Real North. These signalized intersections would reduce the travel distance for drivers needing to make U-turns to access businesses adjacent to Via de la Valle within the project area.

With the road shifted eastward, the driveway for Horsepark would be extended over the drainage ditch to the existing driveway. Modifications to the existing Horsepark entrance would be needed to transition to the new road elevation. A new driveway for activities at the existing Polo Club fields would extend into the City's property, with a length sufficient to meet existing grade at an appropriate slope. Drivers to Mary's Tack and Feed and the veterinary hospital would utilize the same turn lane and driveway extension as for Horsepark, and then turn right onto the segment of existing El Camino Real north of the Horsepark entrance, which would become a dead-end access road. Grade changes would be needed in this segment of existing El Camino Real to transition to the new road elevation. Drivers leaving Mary's Tack and Feed or the veterinary hospital would turn right onto the access road, and then left at a controlled stop onto the western leg of the new Horsepark/Polo Club intersection. From this leg, drivers could turn either right or left to continue south or north on new El Camino Real, or straight to enter Polo Club.

With the Eastern Alignment Alternative, existing El Camino Real would become a dead-end frontage road terminating south of Via de la Valle. Therefore, traffic on Via de la Valle would not be able to turn onto the southbound frontage road.

2.2.7.4 Access with the Roundabout Alternative

Access to various properties with the Roundabout Alternative would be similar to the Eastern Alignment alternative discussed above. However, the intersections at San Dieguito Road, Horsepark, De la Valle Place and El Camino Real North would all be unsignalized roundabouts instead of typical signalized intersections. Drivers would accomplish turn movements or change direction to access properties by progressing around the roundabout. Driveways to properties north of Via de la Valle and east of De la Valle Place would be extended to reach the new alignment of Via de la Valle, as the road would be shifted south to accommodate the roundabout intersection at El Camino Real North.

2.2.8 Signalization

2.2.8.1 El Camino Real and Via de la Valle

The existing traffic signal at El Camino Real and Via de la Valle would be modified as part of this project. For all build alternatives except the Eastern Alignment Alternative and Roundabout Alternative, interconnect cables would need to be installed along Via de la Valle so that the signals function as a system. This would minimize starts and stops, and maximize traffic flows along Via de la Valle. During final design of signal modifications, the adequacy of the existing controller to accommodate new loads would be evaluated. If necessary, controller upgrades would be incorporated into the design.

2.2.8.2 El Camino Real and Horsepark/Polo Club Driveways

A new signal for the intersection would be installed at the Horsepark and Polo Club entrances, except for the Road Capacity Alternative and the Roundabout Alternative. The signal would be designed and set up to revert to green on El Camino Real at all times when there is not a call on the entrances to the recreational facilities. This signal would facilitate crossing of pedestrians, horses, and vehicles during events. However, with the recall feature, the through traffic on El Camino Real would not be delayed when no travelers need to cross the road. Push buttons would be provided to accommodate both pedestrians and equestrians. This signal would also be triggered by traffic in the left-turn pocket to Horsepark from northbound El Camino Real, or in the opposite left-turn/U-turn pocket to Polo Club from southbound El Camino Real. For the Road Capacity Alternative, the signal would be provided as a pedestrian/equestrian crossing, but not for vehicles to trigger. The Roundabout Alternative would not have signal control at this location because the intersection would be an unsignalized roundabout.

2.2.8.3 El Camino Real and Via de la Valle/De la Valle Place (Eastern Alignment Alternative)

The Eastern Alignment Alternative would line up with De la Valle Place on the northern end. This new main intersection with Via de la Valle would be approximately 150 feet east of the existing intersection. This new four-way intersection would be signalized to control all vehicular movements. As noted above under the description of access, with the Eastern Alignment Alternative, existing El Camino Real would become a frontage road for properties north of Horsepark on El Camino Real. Existing El Camino Real would dead end at the south end of the existing intersection with Via de la Valle, and the existing signal would be removed.

The intersection of Horsepark and Polo Club entrances with new El Camino Real would be signalized on the new road alignment as described above.

2.2.8.4 El Camino Real and Via de la Valle/De la Valle Place (Roundabout Alternative)

The Roundabout Alternative would line up with De la Valle Place on the northern end, similar to the Eastern Alignment Alternative. Existing El Camino Real would become a frontage road for properties north of Horsepark on El Camino Real, and the northern end of existing El Camino Real would become a dead end. The roundabout would be unsignalized.

2.2.8.5 El Camino Real and San Dieguito Road

For all build alternatives except for the Roundabout Alternative, the existing signal at the intersection of San Dieguito Road and El Camino Real would be modified to accommodate additional turning movements. For the Roundabout Alternative, the signal would be removed to accommodate the unsignalized roundabout.

2.2.9 Bridge Replacement

The proposed bridge type to replace the existing bridge for all build alternatives is the cast in place (CIP) or prestressed Concrete Box Girder Type. Several structure types were considered in the preliminary bridge study prepared to support the environmental process (T.Y. Lin-McDaniel 1999). Generally in selecting the bridge structure type, the following considerations are involved: economy, safety, aesthetics, deflection, maintenance cost, traffic convenience during construction, time for construction, similarity of adjacent structures, superstructure depth, feasibility of falsework, passage of flood debris, and seismicity at the site. Two structure types were considered for the alternatives studied in detail in this EIR: CIP concrete box girder type, and CIP reinforced concrete slab type. The CIP reinforced slab type bridge would have a shallower structure depth, and consequently less earthwork for the abutments and roadway approaches. However, this bridge type would have shorter spans, so would require more piers than the CIP box girder type, so would cause greater impacts to the river below, and would be more costly, particularly for foundation work. Therefore, the proposed bridge type for all alternatives studied in detail in this EIR is the CIP (or prestressed) Concrete Box Girder Type. This type of bridge has identical construction stages which allow for efficient use of falsework and equipment during construction. This type of bridge also accommodates utilities within the bridge cell structure. Relocated utilities (e.g., the gas line mounted outside the existing bridge) could be placed in a steel pipe casing within the bridge cells during construction of the bridge. Empty casings could be placed in other bridge cells before the bridge deck is constructed to allow future utilities to be inserted after the bridge is completed.

The new bridge support structure would consist of cylindrical piles cast in drilled holes; the piles would extend to an approximate depth of 90 feet below the ground. Above the ground, the piles would narrow slightly to become finished cylindrical concrete columns, or piers. The piers would be approximately 5 feet in diameter, and the piles would be approximately 7 feet in diameter. There would be no pile caps for the bridge foundation.

For the build alternatives with the full widened roadway cross section except for the Eastern Alignment Alternative and the Roundabout Alternative, there would be eight bridge piers and two abutments. The piers would be in two sets of four each along the length of the bridge. The spacing between the two sets of piers would be approximately 125 feet. Each set of piers would be approximately 109 feet from an abutment. This conceptual bridge design would apply to the Central Alignment, Western Alignment, and Lower Elevation alternatives. The General Plan for this bridge design is shown in Figure 2-20. This graphic includes an elevation diagram, profile grade, and typical section of the bridge. The limits of the existing bridge are shown as dashed lines on the west side of the new bridge. The elevation view gives a perspective of the bridge as viewed from the side. Overall bridge length and individual span lengths between piers are shown. The typical bridge section shows the structure type, substructure support type, and width of bridge. Overall, including abutments, the proposed bridge would be approximately the same length as the existing bridge. The bridge would be approximately 73 feet wide.

For the build alternatives with the narrow roadway cross section, bridge features including length, height, and type would be the same as for the above alternatives. However, the total bridge width would be approximately 60 feet to match the narrower roadway width, and there would be two sets of two piers, not two sets of four piers, as shown in Figure 2-21. This bridge concept would apply to the Road Capacity Alternative and the Bicycle Safety Alternative.

The new bridge for the Eastern Alignment Alternative and Roundabout Alternative would be set on a diagonal, completely separate from the existing El Camino Real bridge. The west edge of the new bridge would be approximately 50 feet east of the existing bridge at the south end, and approximately 90 feet east of the existing bridge at the north end. The new bridge would be 354 feet long, which is approximately 14 feet longer than the existing bridge. There would be two sets of three piers each. Fewer piers would be needed than for the full widened roadway cross section alternatives because the bridge would not have to be built one-half at a time. The piers would be 125 feet apart, and each set of triple piers would be approximately 114 feet from a bridge abutment, as shown in Figure 2-22. The width of the bridge for the Eastern Alignment Alternative and Roundabout Alternative would be 73 feet.

For all of the build alternatives, the river banks at the new bridge would be excavated to have a slope of approximately 1.5:1 instead of the existing condition of roughly 2:1. The steeper bank slopes would be protected from erosion by rip rap that would be toed into the river bed. The steep slopes and bridge shading would prevent successful planting of open stabilization materials, so such materials are not proposed for the new bridge abutments. The existing rip rap blanket under the river bed would be replaced if it were disturbed by construction.

For the Eastern Alignment Alternative and Roundabout Alternative, the existing river banks would not be altered at the location of the existing bridge, which would be demolished at the end of construction.

2.2.10 Aesthetic Features and Landscaping

Hardscape features appurtenant to the auto travel way, such as medians, pedestrian walkways, and walls (for the Road Capacity and Bicycle Safety alternatives only), shall be designed to minimize visual impacts on the scenic character of the San Dieguito River Valley. Landscaping along the parkway and on the slopes of alternatives that would raise the road on embankment would be low-maintenance native plantings, consistent with the landscaping plans and permit conditions for the widening of Via de la Valle from San Andreas to El Camino Real. Proposed landscaping concepts are shown in Figure 2-23. All required landscaping for this project shall conform to the City of San Diego's Landscape Regulations - Article 2, Division 4; the Land Development Manual – Landscape Standards; and all other landscape related City and Regional Standards. The proposed plant palette would include street trees such as coast live oak (Ouercus agrifolia) and netleaf hackberry (Celtis reticulata), and slope trees such as Torrey pine (Pinus torrey ana), redshanks (Adenostoma sparsifolium), and western redbud (Cercis occidentalis). Small shrubs and ground covers for the right of way would include covote bush (Baccharis pilularis), California fescue (Festuca californica), California buckwheat (Eriogonum fasciculatum), blue eyed grass (Sisyrinchium bellum), and California fuschia (Epilobium canum). Native shrubs for the road embankments for most of the alternatives and in front of the retaining walls for the Road Capacity and Bicycle Safety alternatives would include creeping sage (Salvia sonomensis), white sage (Salvia apiana), toyon (Heteromeles arbitufolia), coastal prickly pear (Opuntia littoralis), scrub oak (Ouercus berberifolia), coffeeberry (Rhamnus californica), and Our Lord's Candle (Yucca whipplei). Trees such as western redbud would also be planted in front of the walls for the Road Capacity and Bicycle Safety alternatives. The walls for the Road Capacity and Bicycle Safety alternatives shall be the minimum height necessary to support the road design, and shall have a finish veneer of natural stone or textured shot-crete, integrally colored to match the existing soil color and rock strata, or the proposed walls along Via de la Valle from San Andreas to El Camino Real, in accordance with direction from the City Planning Department and Development Services Department-Landscape staff. Veneer shall allow for consistent visual character and natural blending with the surrounding environment.

All disturbed slope areas would receive erosion control hydroseed, and all slope areas that are 4:1 gradient or steeper would also receive storm water and erosion control fiber rolls. The proposed native hydroseed mix would consist of California sagebrush (*Artemesia californica*), coast sunflower (*Encelia californica*), toyon (*Heteromeles arbitufolia*), Nuttal's lupine (*Lupinus truncates*), Mission red monkeyflower (*Mimulus puniceus*), purple needle grass (*Nassella pulchra*), California blue bells (*Phacelia campanularia*), showy penstemon (*Penstemon spectabilis*), lemonade berry (*Rhus integrifolia*), sugar bush (*Rhus ovata*), and blue-eyed grass (*Sisyrinchium bellum*), consistent with the mix for hydroseeding along Via de la Valle from San Andreas to El Camino Real.

The pedestrian walkway would consist of a 5.5-foot-wide walkway within the 22-foot-wide parkway. A concrete sidewalk would be installed on the bridge. The existing sidewalk on the north side of Via de la Valle would remain. Rough, decomposed granite (d.g.) pedestrian walkways are not proposed, as these would not be in conformance with Americans with Disabilities Act (ADA) standards.

The 4-foot-wide raised central median for all alternatives except the Road Capacity Alternative (which would have a 2-foot-wide striped median on the road pavement) would be hardscape to minimize maintenance. The proposed median hardscape would consist of Bomanite, Bomacron stamped concrete – river stone pattern in sombrero buff color, or the hardscape material that is constructed along Via de la Valle from San Andreas to El Camino Real, if a different material is used for that project.

Temporary irrigation system(s) shall be provided for the parkway strips and embankments to establish project landscaping. This would be performed by contractors under direction from the City department supervising project construction. Long-term maintenance of the parkway strips, embankments and median shall consist of routine weed abatement and removal of invasive species and shall be the responsibility of the City of San Diego Streets Division.

An aesthetic theme proposed is that of the old mission bell. The metal bells set in the curve of a pole shaped like a shepherd's crook once marked the route connecting California's chain of missions. That route was "The King's Road," or El Camino Real. The actual location of the original El Camino Real is not really known, as early trails washed out and shifted over time. In 1959, the State Legislature proclaimed Old Highway 101 to be El Camino Real, but some of the highway has been replaced by freeway and city streets. If this portion of El Camino Real is determined to be part of the route appropriate to be marked by replicas of the mission bells, allowances for a roadside icon, or a bell on the bridge, could be incorporated into the design. Coordination with Caltrans is continuing on this possibility.

Design aesthetics consistent with the NCFUA Framework Plan that would be incorporated into final design include the following:

- Retention of land forms, mature trees and other natural features to the extent possible
- Provision of a landscaped roadway edge using berms and dense planting
- Minimized street lighting

- Use of materials that blend with the natural environment or rural character of the area
- Provision of non-contiguous pedestrian walkways incorporating non-standard, earth tone color and materials other than concrete that are consistent with ADA standards.

Aesthetic features of the bridge would include white decorative railings evocative of the existing fencing along El Camino Real and the railing on the existing bridge. Low sodium type lighting would be provided at the modified intersections and the Horsepark/Polo Club driveway intersection with El Camino Real. Continuous street lighting would not be installed. Street lights would be housed in Mission Bell fixtures with horizontal cut-off and would be shielded downward.

2.2.11 Recreational Trail Connections

There are existing and planned regional and community trails in the surrounding area that depend on the El Camino Real bridge as an essential connecting link, including the San Dieguito River Park Coast to Crest Trail. In addition, a network of multi-purpose trails in the Pacific Highlands Ranch Specific Plan are planned to be extended to the west to connect to the Coast to Crest Trail as this portion of the NCFUA is developed.

This EIR evaluates the environmental impacts of including a trail cantilever structure attached to the west side of the bridge for all build alternatives. The cantilever would be a multi-use trail to accommodate equestrian users of the regional trails as well as pedestrians and bicyclists. The cantilever would be approximately 8 feet in width with a barrier between the road and trail to protect trail users from automobiles and a protective fence along the outer edge of the cantilever above the river channel. The cantilevered trail would accommodate horses, bikes, and pedestrians and would be ADA-accessible as the bridge itself. However, the main users of the cantilever likely would be equestrians, because striped bike lanes would be provided in the roadway pavement of the bridge (for all build alternatives except the Road Capacity Alternative), and sidewalk would be provided on both sides of the bridge for all build alternatives. The cantilever would transition into a surface trail on either side of the bridge. Although evaluated in this EIR, the cantilever would not be constructed as part of the project unless funding from outside sources beyond the City or the federal HBP is identified. If funding for the cantilever is not identified at the time of bridge construction, support structures (corbels) would be installed on the bridge during construction to facilitate later placement of the cantilever by others.

For the Eastern Alignment Alternative and the Roundabout Alternative, the new bridge would be approximately 50 to 100 feet east of the existing bridge. The existing bridge would be demolished and a cantilever structure would be accommodated on the new bridge as for the other alternatives.

A feature proposed for all build alternatives except the Lower Elevation Alternative is a JPA multi-use trail under crossing under the north bridge abutment. The trail platform would be set at the 10-year flood level (approximately 13 feet above msl). There would be 12 feet of clearance above the trail surface to the underside of the bridge deck, to allow sufficient clearance for an equestrian, per JPA guidance. To incorporate this clearance, the new bridge would need to be about 3 feet higher than the bridge would have to be for the 100-year flood level alone. The under crossing would be paved, and would be approximately 12 feet wide. It would connect to the existing public trail along the north bank of the river east of El Camino Real, and the planned Coast to Crest Trail alignment on the north bank of the river west of El Camino Real. As a result of the undercrossing, the new bridge would have a height that is 6 feet higher than the existing bridge.

2.2.12 Haul Routes and Staging Area

The preferred haul route expected to be followed by heavy equipment is from I-5, east on Del Mar Heights Road, then north on El Camino Real, which is already four lanes to San Dieguito Road, and continuing northward to the portion of El Camino Real under construction. If certain construction activities would make accessing El Camino Real from the south difficult, the area could be accessed from I-5 east on Via de la Valle to El Camino Real. All planned haul routes are currently paved.

The designated staging areas for Project construction total approximately 3 acres and include a privately owned parcel bounded by El Camino Real, Old El Camino Real, and San Dieguito Road that is periodically used by fruit, Christmas tree, and pumpkin vendors; and City-owned property within the alignment of Old El Camino Real north of San Dieguito Road and east of the curved portion of El Camino Real. These areas have been previously used as staging areas for projects in the area including construction of the undercrossing of El Camino Real of Gonzales Canyon in 2012. The staging areas are primarily undeveloped and disturbed land; a small patch of Diegan coastal sage scrub occurs within the northern staging area but would be fenced and avoided during construction. Upon completion of construction, the disturbed parts of the staging area would be cleared, re-graded to match existing conditions, and, where appropriate, hydroseeded with the approved upland native plant palette. It is anticipated that the privately owned parcel will not be seeded with native plant species. An unpaved parking area situated north of the river and west of El Camino Real could be used as an additional staging area for activities occurring north of the river.

2.2.13 Utility Relocations

As discussed in Section 3.6, for all alternatives except the Eastern Alignment Alternative and Roundabout Alternative, buried utilities currently in El Camino Real would need to be relocated vertically because the proposed road elevation would change. These utilities include gas and sewer pipelines. Overhead power and communication facilities would be relocated to the new edge of the roadway. Other utilities such as water lines in El Camino Real and Via de la Valle would be relocated or protected in place as appropriate, based on final design conducted after the alignment alternative is selected.

For the Eastern Alignment Alternative and Roundabout Alternative, utilities currently in the portion of El Camino Real between the north end of the bridge and Via de la Valle could be relocated to the new alignment in order to remain in a public right of way, or suitable easements could be obtained to keep the utilities in their existing location. SDG&E may choose to keep their overhead power lines in the shoulder of the existing roadway if they obtain suitable easements.

2.2.14 Drainage Improvements

For the Central Alignment and Lower Elevation alternatives, the existing drainage ditch parallel to El Camino Real would be re-created along the eastern edge of the widened roadway. The new ditch would be unlined, and would be planted with native vegetation. It would be sized to carry flows comparable to the existing drainage ditch. The new ditch would be included in the City's ownership with the acquired right of way for the road, and maintenance would be the City's responsibility. Maintenance in the drainage ditch is anticipated to be limited to periodic removal of trash and invasive plants on an as-needed basis.

For the Eastern Alignment Alternative and Roundabout Alternative, most of the existing drainage ditch parallel to El Camino Real would not be disturbed. However, a new culvert would have to be installed at the existing Polo Club driveway to extend and widen the ditch overcrossing.

All build alternatives propose a triple 10-foot by 3.5-foot RCB culvert to replace the existing culverts under Via de la Valle at El Camino Real North. Once on the south side of Via de la Valle, runoff from large storm events would continue to flow overland in a southerly direction toward the San Dieguito River as under existing conditions. However, low flows (nuisance runoff) would be conveyed in a buried low-flow storm drain that would be constructed within widened Via de la Valle. This runoff would be directed from the upstream edge of the proposed culvert system to the existing ditch just east of existing El Camino Real. This design would maintain low flows to the existing ditch parallel to existing El Camino Real while still allowing large flows to be conveyed southerly toward the San Dieguito River.

A drainage swale would be built at the toe of the new eastern El Camino Real embankment slope, all along the new road alignment from Via de la Valle to the river. This drainage swale would be designed to prevent nuisance flow from ponding on the lands of the existing Polo Club fields adjacent to the toe of the eastern road embankment. The unlined, natural grass drainage swale would be approximately 2 feet deep, 2 feet wide at the bottom, and would have 1:1 side slopes.

2.2.15 Project Construction

Construction Steps. The basic overall construction steps proposed for the build alternatives are listed below and described in detail in the <u>Bridge Construction Methodology & Associated Noise</u> <u>Reduction Measures, and Biological & Hydraulic Impacts</u> included as Appendix D. Although Appendix D uses the Eastern Alignment as the example, the construction methodologies would apply to all build alternatives. The Eastern Alignment Alternative and Roundabout Alternative would involve construction of the entire bridge and all four lanes of the roadway north of the bridge in one stage independently of existing El Camino Real, whereas the other alternatives would be constructed in separate stages as listed below.

- Mobilize equipment to the project site
- Construct one two-lane side of the new bridge
- Clear widened road right of way
- Construct offsite utility relocations, including drainage culverts and channels
- Construct one two-lane side of the widened roadway
- Reconstruct Polo Club fields driveway
- Shift traffic from the existing roadway and bridge to the new road and bridge
- Construct the other two-lane side of the widened roadway
- Reconstruct Horsepark driveway, and Mary's Tack and Feed driveway
- Install slope landscaping and enhancements
- Demolish the existing bridge (this would be the last step for the Eastern Alignment Alternative and Roundabout Alternative)
- Steepen the river banks under the bridge
- Construct the other two-lane side of the bridge
- Make closure pour to join the two halves of the bridge (optional)
- Construct intersection modifications and adjacent roadway transitions
- Stripe the travel lanes and install signals

Steps involved in constructing the new bridge are listed below.

- Construct bridge trestle above the river
- Drill holes for piles below ground, install the rebar (reinforcing steel bars), and pour the concrete to form the piles
- Install the rebar for the bridge columns (piers) above ground, place forms, and pour the concrete to form the piers
- Construct the falsework (temporary support structure)
- Install the rebar for the bottom of the bridge (stem and soffit), place forms, and pour the concrete
- Install the rebar for the deck of the bridge, place forms, and pour the concrete
- Conduct finish work on the concrete and backfill
- Construct the approach slabs on each end of the bridge
- Remove the falsework and trestle
- <u>Construct an undercrossing under the north end of the bridge compatible with the existing</u> <u>Coast to Crest Trail alignment that was recently completed along the south edge of Horse</u> <u>Park up to El Camino Real</u>
- Construct the sidewalk, barrier and handrail on each side of the bridge
- Make joint seals
- Finish the bridge surface with striping and other roadwork

For most of the build alternatives, half of the bridge would be constructed with the above steps, traffic would be routed to the new side of the bridge, the existing bridge would be demolished, and the above steps would be repeated for the other half of the bridge. Salvaging of any materials from the existing bridge would be at the discretion of the construction contractor and is not anticipated for purposes of this environmental analysis. Concrete, wood, steel and other materials resulting from demolition of the existing bridge would be hauled to an appropriate landfill. For the Eastern Alignment Alternative and Roundabout Alternative, the four-lane bridge would be built in one stage, and traffic would be routed onto the new bridge when the new bridge and road are completed. The existing bridge would be demolished at the end of the construction process, when the new bridge is completed.

The planned construction schedule would conform to City regulations. Construction is anticipated to occur Monday through Friday from 8:30 A.M. to 3:30 P.M. Project construction durations for the build alternatives are presented in critical path schedule format in Figures 2-24 through 2-29. The Central Alignment, Western Alignment, and Lower Elevation alternatives would have a full width cross section and two sets of four bridge piers, and would be constructed in two phases although for the Western Alignment the western side of the bridge would be constructed first. The Road Capacity and Bicycle Safety alternatives would have a narrow cross section and two sets of two bridge piers, and be constructed in two phases. The Eastern Alignment Alternative and Roundabout Alternative would have a full width cross section and two sets of three bridge piers, and would be constructed in a single phase completely free of the existing El Camino Real bridge and road north of the bridge.

The construction estimates take into account the anticipated stopping of construction over the river to avoid noise impacts on sensitive birds during the time period of February 1 to September 15 (encompassing the breeding season for clapper rail and least Bell's vireo). All of the build alternatives except the Eastern Alignment Alternative and Roundabout Alternative would span three breeding seasons for project construction. The Eastern Alignment Alternative and Roundabout Alternative and Roundabout Alternative would span two breeding seasons.

All build alternatives will require construction activities within the San Dieguito River or elevated above and across the river. Two options have been identified to accomplish this requirement: (1) earthen berms that cross the river or (2) elevated trestles that cross the river. These features are considered necessary to provide a stable pad for construction of the new bridge and demolition of the existing bridge, as summarized below and in presented in detail in Appendix D. It should be noted that these two construction options are conceptual and apply to all potential alternative alignments and, thus, may not be used to differentiate alternatives.

Berm Option. Under this option, the contractor would build a single temporary earthen berm or multiple berms that would provide a working pad area approximately 30 feet east and 30 feet west of the proposed bridge. The total width of the berms would vary based on the height of the fill placed, but it is anticipated that these berms would be approximately 10 feet above the existing river bottom and would extend approximately 30 feet outside of the edge of deck on each side of the bridge, thus would be approximately 150 feet wide at the top if a single berm was used. The berms would extend from the north bank to the south bank of the San Dieguito River, with a least one opening approximately 40 feet wide to allow for river flows and for use as a wildlife corridor. It is estimated construction of the berms for constructing the bridge would take one to two months. Using the berm and the embankment, the contractor would construct the piles, columns, and place temporary falsework for the construction of the superstructure of the bridge.

Upon completion of the berm, the Cast In Drilled Holes (CIDH) piles that support the bridge would be constructed. Piles will be constructed using a large drill rig, large crane, front-end loader, Baker tanks for drilling fluid storage, dump trucks for spoil removal, and other typical construction equipment.

The CIDH pile foundations will be constructed by drilling through the berm, placing a casing and/or drilling slurry to maintain the hole, placing the pre-fabricated steel cage into the hole and pumping the required concrete mix into the drilled shaft while holding the steel cage and casing in place with other large cranes. This operation will be repeated to construct the required number of columns. Upon completion of each pile, the contractor can begin construction on the columns for the bridge. After the columns are complete, the contractor can construct falsework to support the bridge superstructure. If the berms are stable enough, falsework may be constructed on the berm on spread footings. If the berms are not stable enough, piles driven through the berm would be required to support the superstructure.

Assuming that driven piles are needed, the contractor would drive temporary steel piles through the berm to create a foundation for each falsework bent. Falsework piles will likely be 20-inch-diameter steel shell piles. This would be accomplished by staging the pile driving rig on the berm or on the embankment near the abutment. Subsequent piles would be driven with the pile driving rig on the berm. The number of piles (if used) in a falsework bent and the number of falsework spans is to be determined by the contractor; however, an estimate of the typical spacing of piles is 1 falsework bent every 30 feet, with 16 to 20 piles/bent located beneath the bridge spaced at 5 feet on center measured perpendicular to the bridge. It is estimated that the number of piles required to support the falsework for an approximately 350-foot-long bridge would total 300 temporary piles with 13 falsework bents constructed in the river beneath the bridge and 2 bents on abutments beneath the bridge. Upon completion of bridge constructed. The temporary piles may be vibrated out of the sediment or may be cut off approximately 2 feet below ground surface and backfilled. Limited access under the 90-foot-wide bridge will significantly affect the ability and cost of removing the piles.

Once the bridge construction is completed, the berm material would be used to construct a third berm on the west side of the new bridge extending under the existing bridge to provide a pad for demolition of the existing bridge. The berm would be accessed by construction personnel and equipment to facilitate demolition and removal of the concrete deck, beams and pier walls. It is likely that the combined access from the berm and the deck of the existing structure will be utilized to remove the deck and beams. The alignment of the existing bridge is not situated within the proposed alignment for the Eastern Alignment Alternative or the Roundabout Alternative. Thus, under these alternatives, demolishing the bridge would result in additional impacts. These impacts have been incorporated into the footprints for the Eastern Alignment alternative and the Roundabout Alternative.

The berm would act as a barrier, preventing demolished concrete, steel and other debris from falling into the San Dieguito River. The contractor can mobilize demolition equipment onto the berm, demolish each pier and collect the material on the berm. It is proposed that the contractor would remove existing pier walls 2 feet below the original riverbed, leaving footings and piles below in place. This would be the least impactful scenario. To remove the existing piers below grade, it may be necessary to drive a sheet pile coffer dam around the existing piers after the superstructure is removed, providing access to the foundation while controlling the water at that elevation. These sheet piles would be vibrated into place and vibrated out when removed.

Demolished concrete, steel and other material would be transported off-site by conventional construction equipment, e.g., front-loaders and dump trucks accessing the berm. Once the existing bridge is demolished and all debris removed from the river bed, the Contractor would remove the berm material from the river return the river to its preconstruction contours.

Trestle Option. Under the trestle option, driven piles would be required for support of both an elevated trestle on both sides of the bridge that provide access in a manner similar to the berm and for support of the falsework beneath the bridge, effectively doubling the number of piles needed for bridge construction. Piles are long, slender timber, concrete, or steel structural elements that are driven or otherwise embedded on end in the ground for the purpose of supporting a load or compacting the soil. The trestle would provide a 30-foot-wide stable platform on each side of the bridge across the entire width of the river. This option would allow unimpeded flows in the river and unimpeded movement by wildlife during the 2.5- to 3.5-year construction process. Approximately 400-500 temporary piles would be driven for this option using an either a diesel-driven impact hammer or a quieter hydraulic impact hammer and removed using a vibratory hammer. Driving the piles with an impact hammer will be necessary to ensure they have the capacity to support the heavy equipment necessary to construct the bridge. Additional piles would be needed to demolish the existing bridge.

CIDH pile foundations would be constructed in a manner similar to that presented above, except that the foundation would not need to be drilled through the berm material. A steel casing would be placed to act as a coffer dam to allow the pile and column construction in the river without the need for a berm. Falsework would be supported on piers consisting of piles driven beneath the bridge. These piles would be driven from the abutments and on the trestle.

A third trestle would be required to demolish the existing bridge. This structure would be as complex as trestles built to construct the bridge, however, it can be narrower. Use of a trestle for demolition will require a netting system (or equivalent) supported from the trestle and existing piers to prevent debris from dropping into the San Dieguito River during demolition.

Upon completion of the demolition of the existing superstructure, the third trestle would provide access to drive sheet piles around existing piers to facilitate partial removal of the substructure below grade.

It is estimated that approximately 700 - 800 total driven piles would be required for this option, including the third trestle needed for demolition of the existing bridge (400 - 500 piles for bridge construction and an approximately 300 additional piles for demolition of the existing bridge). Piles would be driven during the non-breeding season for light-footed clapper rails and least Bell's vireo (October 1 – January 31). The duration of pile-driving under this option could be two to three months. It is proposed that the contractor would remove existing pier walls 2 feet below the existing riverbed, leaving footings and piles below in place.

2.2.16 Public Right of Way Vacation for Eastern Alignment Alternative and Roundabout Alternative

For the Eastern Alignment Alternative and Roundabout Alternative, the segment of existing El Camino Real from Horsepark driveway north to Mary's Tack and Feed driveway would remain in place to serve as access to Mary's Tack and Feed and the veterinary hospital. Roadway on existing El Camino Real north of the bridge not needed for access could be vacated by the City and made available to adjacent property owners. In this case, the pavement section would be removed and the area would be graded for drainage purposes. The application for vacation of the public right of way would be initiated by resolution of the City Council in accordance with Chapter 12, Article 5, Division 9 of the San Diego Municipal Code. Any public facilities not relocated to the new roadway and remaining in existing El Camino Real may be deemed unaffected by the vacation if an appropriate easement is reserved from the vacation to provide for the continued use and maintenance of the public facility. The road segment abandonment would occur at the end of the project, when all components have been completed and traffic has been transitioned to the new roadway.

Upon completion of the vacation process, the land relinquished by the City would be the responsibility of the receiving entity. This would be the 22^{nd} Agricultural District in the case of the road segment adjacent to the Horsepark property. The entity taking the land would be responsible for erosion control and maintenance of the land.

2.3 IDENTIFICATION OF THE CITY PREFERRED ALTERNATIVE

The City has identified the Eastern Alignment Alternative as its Preferred Alternative. This alternative allows the bridge and the roadway for El Camino Real north of the bridge to be constructed completely free of the existing bridge and roadway. The Eastern Alignment Alternative therefore would avoid lengthy disruption of traffic during construction. Also, the bridge could be built in one phase, so would need fewer piers (two sets of three versus two sets of four for most of the other alternatives).

Construction of the bridge for the Eastern Alignment Alternative would affect the river for a shorter duration than most of the other alternatives. Bridge construction is anticipated to span three bird breeding seasons (when construction in the river would have to stop) for most of the alternatives, but would span only two bird breeding seasons for the Eastern Alignment Alternative because the bridge can be built in a single phase. Although the bridge for the Roundabout Alternative would be the same and offer the same construction timing advantages, the Roundabout Alternative would impact the greatest acreage of wetlands and coastal sage scrub

of any of the alternatives. Therefore, it is likely that it would be very difficult to obtain permits from federal, state, and regional resource agencies for the Roundabout Alternative.

The City also prefers the Eastern Alignment Alternative because it would generate the least impacts to properties developed with structures (Horsepark and Mary's Tack and Feed along the west side of El Camino Real), maximizes the alignment on City owned property, and minimizes the alignment in environmental tier lands and the Coastal Zone.

The Eastern Alignment Alternative would generate intersection operation benefits by moving the major intersection of El Camino Real and Via de la Valle to the east, lining up with De la Valle Place on the north leg instead of a commercial driveway as under existing conditions. The Eastern Alignment Alternative would thus provide more regulated turn movements, and would place the intersection of El Camino Real and Via de la Valle in a location that is less constrained by existing buildings along the southern edge of Via de la Valle and by steep slopes along the northern edge. The Eastern Alignment Alternative also is the only alternative that would allow full intersection improvements for eastbound Via de la Valle at El Camino Real, including a left turn, two through lanes, and a dedicated right turn from eastbound Via de la Valle to southbound El Camino Real, without affecting existing commercial properties south of Via de la Valle and west of El Camino Real. Therefore, the Eastern Alignment Alternative provides the most improvement in long-term traffic operations.

2.4 AGENCY DISCRETIONARY PERMITS

The City of San Diego will have to certify this recirculated EIR under CEQA in order to approve the proposed project for construction as Capital Improvement Project No. 52-479.0. Project implementation will also require City approval of a Site Development Permit due to the presence of Environmentally Sensitive Lands (ESL; Process 4–<u>5</u> action due to wetland deviations) and <u>coordination with CCC for a Coastal Development Permit due to project features located in the Coastal Overlay Zone (Process 4 action), which could be appealed to the CCC for areas in the City's jurisdiction. The City will use information in this document to verify that input on wetland impact avoidance has been solicited from the USFWS and CDFW, in addition to other agencies, in accordance with SDMC Section 143.0141(b). The City's processing also requires demonstration that the recommendations from the resource agencies have been incorporated into the project design, and that the preferred alternative is the most sensitive design possible. The wetland deviations require conformance with the ESLs, SDMC Section 143.0150. Findings of approval are required per SDMC Section 126.0504. Also, deviations within the Coastal Overlay Zone require supplemental findings of economical viable use, SDMC Section 126.0708(b).</u>

Other agencies will use this document to make discretionary decisions regarding project permits and funding, in accordance with CEQA requirements, as summarized in Table 2-2.

Caltrans District 11/FHWA will need to approve the separate EA under NEPA, conclude that no significant impacts under NEPA would occur, and prepare a FONSI before federal funding for final design, right of way acquisition, and construction can be accessed for the project.

Agency	Permit/Approval	Triggering Project Feature
USACE	Individual 404 Permit	Impacts to wetlands and Waters of the U.S. due to bridge and road construction
USFWS	Section 7 Consultation for Threatened and Endangered Species Review and Comment on 404 Permit	Potential impacts to clapper rail and least Bell's vireo, federally endangered species
CDFW	1600 Agreement for Streambed Alteration Section 2080.1 Agreement for Threatened and Endangered Species	Disturbance of wetlands and potential impacts to clapper rail, a state endangered and Fully Protected species
RWQCB	401 Water Quality Certification for assessment of effects to water quality from federally permitted impacts to wetlands or waters via the Individual 404 Permit	Impacts to wetlands and Waters of the U.S. due to bridge and road construction
RWQCB	California RWQCB, San Diego Region Waste Discharge Requirements for Discharges of Urban Runoff from the MS4s Draining the Watersheds of the County of San Diego, the Incorporated Cities of San Diego County, the San Diego Unified Port District, and the San Diego County Regional Airport Authority Order No. 2007-01, NPDES No CAS0108758	General construction area greater than 1 acre
SWRCB	NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities Activity Order No. 2009-0009-DWQ NPDES No. CAS000002 (Adopted September 2, 2009)	General construction area greater than 1 acre
State Historic Preservation Officer	National Historic Preservation Act compliance under Section 106 of 36 CFR 800 for potential impacts to historic properties	Potential impacts to potentially buried resources during excavation for bridge, roadway, and mitigation site development
CCC	Coastal Zone Boundary Determination Coastal Development Permit for any project features that extend into CCC jurisdiction Possible Federal Consistency Certification	Potential boundary shift and location of project features in Coastal Zone, depending on the alternative.
County of San Diego	Approvals for construction activities within County jurisdiction	If construction affects areas in the County
SDG&E	A "permission to grade letter" from for any grading to be performed within SDG&E right of way	Relocation of SDG&E facilities
SDG&E	Coordination for project grades to assure clearances as required by California Public Utilities Commission General Order 95	Grading for roadways and mitigation site
City of San Diego	Site Development Permit (Process <u>5</u> 4 action)	Presence of ESLs
City of San Diego	Coastal Development Permit (Process 4 action)	Location of project features in Coastal Overlay Zone, depending on alternative

Table 2-2Permits, Reviews and Approvals Required

2.5 HISTORY OF PROJECT CHANGES

2.5.1 **Project Development History**

The City initiated conceptual design and preliminary environmental studies for widening this segment of El Camino Real and replacing/rehabilitating the bridge in 1998. A Final Project Report describing the project setting and engineering and environmental issues was completed in June, 1999 (Earth Tech 1999b).

The City is the project proponent and the lead agency under CEQA. A Notice of Preparation (NOP) was distributed to agencies and the general public on July 22, 1999. A Scoping Meeting to present the proposed project to interested stakeholders was held at the Carmel Valley Library on August 25, 1999. In addition to the Scoping Meeting, presentations were made at regularly scheduled meetings of five community groups in the study area during the period from December 8, 1998, to January 28, 1999, as follows:

•	Carmel Valley Planning Group	December 8, 1998
•	Fairbanks Ranch Association Planning and Land Use Committee	December 15, 1998
•	San Dieguito River Park JPA Citizens Advisory Committee	January 8, 1999
•	Rancho Santa Fe Association	January 21, 1999
•	San Dieguito Planning Group	January 28, 1999

Agency coordination with the USACE, USFWS, CDFW, and San Diego RWQCB was initiated at the City of San Diego/Resource Agency bi-monthly meeting on February 16, 1999. Coordination with the USACE continued at a Pre-Application meeting held on September 15, 1999.

Due to funding issues, continued environmental studies and engineering conceptual development were delayed until October 2001.

When the project was re-started, project materials were updated. As part of City processing, an application for a Site Development Permit/Coastal Development Permit was submitted to City of San Diego Development Services Department and deemed complete on March 4, 2002. Another Pre-Application Meeting was held on April 10, 2002, at the City of San Diego. Representatives of the USACE, USFWS, CDFW, and the CCC attended.

Federal funding was requested from and has been obligated by FHWA for improvements to the bridge through the HBP. Therefore, NEPA must be satisfied as well as CEQA. FHWA is the lead agency under NEPA. Caltrans is the local assistance liaison to FHWA.

Because the project involves federal funding through FHWA and requires an Individual 404 Permit from the USACE, the coordination process with the USACE and other federal agencies was initially considered to be dictated by requirements of the <u>Guidance Papers to Facilitate the</u> Implementation of the Memorandum of Understanding for the NEPA and Section 404 Integration

Process for Surface Transportation Projects in Arizona, California, and Nevada (FHWA 1994). The "NEPA/404 Integration Process" requires written agreement from federal agencies at specific project milestones, including agreement on the project purpose and alternatives proposed for detailed study in the environmental document. A concurrence document presenting the project Purpose and Need Statement and Alternatives Analysis Report was submitted to Caltrans for initial review on February 25, 2002. The document was forwarded to FHWA without changes on April 2, 2002. A letter from FHWA was received May 9, 2002, which noted: "We concur in the Purpose and Need as well as alternatives analysis but have a few comments that will eventually need to be addressed." A revised concurrence document that addressed the five FHWA comments was submitted to Caltrans on August 26, 2002, and subsequently forwarded to FHWA. In a meeting on July 2, 2003, FHWA notified Caltrans and project participants that if impacts to wetlands total less than 5 acres, the NEPA/404 Integration Process would not be triggered. In 2012, Caltrans confirmed that the NEPA/404 Integration Process only applies to projects requiring an Environmental Impact Statement (EIS). Since the proposed project is being addressed under NEPA by an EA, the NEPA/404 Integration Process would not apply even if wetlands impacts exceeded 5 acres.

On November 6, 2002, an updated NOP was issued in accordance with City standards and requirements. The end of review date was December 5, 2002.

Throughout 2003, conceptual designs were developed for the build alternatives to be studied in detail in the environmental document. Existing conditions, particularly in regards to biological resources, were mapped and quantified. Preliminary studies on road/bridge features and environmental analyses were conducted to assess potential impacts and provide a starting point for more detailed analysis in response to the regulatory framework.

In 2004, detailed hydraulic modeling demonstrated that 100-year water surface elevations with the project could be maintained at levels predicted for existing conditions by steepening the abutments under the proposed bridge, and extensive widening of the river would not be needed. This would reduce impacts to wetlands to be less than 5 acres.

In mid-2004, two Agency Coordination meetings were held with the full range of regulatory agencies in order to (1) discuss the need for formal NEPA/404 consultation with FHWA, USACE, EPA, NMFS, and USFWS, and (2) concurrently conduct preliminary permitting coordination with these federal agencies and the following non-federal regulatory agencies: CDFW, RWQCB, and CCC. The meetings on July 14 and September 7, 2004 were well attended. Notes from these meetings are included in Appendix C. At the September 7, 2004 meeting, the pertinent agencies concurred that because wetlands impacts would be less than 5 acres for the alternatives to be studied in detail, the project would not fall under the NEPA/404 Integration Process.

In 2005, project efforts focused on preparation of the environmental documents needed to satisfy CEQA and NEPA, including development of an appropriate wetlands mitigation concept. Agency Coordination meetings were held on February 28, April 4, and October 25, 2005 to discuss mitigation ratios, the multiple-site mitigation planning process conducted by the City, and the mitigation concept developed for the environmental document. Notes from these meetings are included in Appendix C. At the February 28 and April 4 meetings, the City explained that their preferred mitigation site is the former Boudreau site located west of El Camino Real and recently purchased by the JPA. At the April 4 meeting, USFWS and CDFW concluded that if it can be demonstrated that emergent marsh can be established on the JPA Mitigation Site, then that site is acceptable for mitigation for El Camino Real Bridge/Road Widening Project, and that

hydrologic feasibility is related to the depth of groundwater on the site, and the ability to connect to the river without affecting river hydraulics. At the October 25 meeting, the City discussed available locations for wetlands creation and enhancement, and presented the basic concepts of the wetlands mitigation plan for the project on the JPA (former Boudreau) Mitigation Site. Representatives of the San Dieguito River Park JPA also attended the Agency Coordination meetings in 2005.

In 2006, a Draft EIR was circulated for public review from July 25 to September 7. Twenty letters of comment were received by the City and are included as Appendix E. The letters included a comment letter submitted on October 23, 2006 by USFWS and CDFW (formerly CDFG). The City conducted an extensive and lengthy outreach effort to the public and resource agencies for several years following close of the comment period. Based on that effort, changes were made to the alternatives and the proposed mitigation plan.

On September 26, 2012, a meeting attended by USFWS, CDFW, San Diego RWQCB, and the USACE was held to review and discuss to the alternatives and the proposed mitigation plan as a result of the comments received. In May of 2014, at an additional coordination meeting, the resource agencies agreed that a 1:1 mitigation ratio at the JPA Mitigation Site is acceptable as long as there is a net benefit or a significant increase in quality and function of the re-established/restored/enhanced wetlands. Therefore no credit would be given and no additional mitigation would be required for these temporary impacts. Documentation of this communication is provided in Appendix C of this recirculated EIR.

2.5.2 Changes to Project Components

Physical changes that have been made to the project in response to environmental concerns raised during the review of the project include the following:

- In September 2004, extensive river widening and bridge lengthening previously proposed was withdrawn as a project feature. This concept was determined to not be needed hydraulically to achieve no net rise in upstream 100-year water surface elevations, and was judged to potentially decrease long-term beach sand supply and potentially degrade clapper rail habitat upstream of the bridge.
- In fall 2005, in response to suggestions by the CDFW made at the April 4, 2005 meeting, the City decided to provide an option to retain the existing bridge for the Eastern Alignment Alternative, and consulted with the JPA to discuss the possibility of the bridge being vacated to this agency. The JPA decided they might be willing to work with the City to pursue an agreement for the JPA to accept the bridge as a non-vehicular, multi-use trail facility. This option would not be possible for the other build alternatives, which would be constructed in the alignment of the existing bridge and roadway, and would require removal of the existing bridge.
- In September 2006, when the JPA reviewed the 2006 Draft EIR, they expressed reservations about accepting the existing bridge if the Eastern Alignment Alternative were selected. In a letter dated December 13, 2011 (Appendix C), the JPA notified the City that the JPA Board decided they could not take ownership and maintenance of the existing bridge if it remained in place after a new bridge is built. Therefore, this recirculated Draft EIR evaluates the Eastern Alignment Alternative with the existing bridge demolished, similar to the other alternatives.

- In September 2006, a community task force was formed to discuss other roadway widening alternatives. A 54-foot-wide paved roadway cross section consisting of two 14-foot-wide travel lanes, a 14-foot-wide emergency vehicle center lane, and 6-foot-wide bicycle lanes, plus parkways, was developed by the task force. A similar cross section was proposed for the bridge, with 5- to 10-foot-wide sidewalks, for a total width of 60 to 70 feet. This cross section was proposed to be in the location of the Eastern Alignment Alternative. Because this cross section did not improve traffic operational conditions to the level needed to satisfy the project goals and objectives (purpose) and need, the task force alternative was considered, but rejected, as discussed in Chapter 5.
- In response to task force recommendations, the full widened roadway cross section for most of the build alternatives was modified to be reduced to a total width of 104 feet, as described in Section 2.2.2.2 of this Recirculated EIR. Likewise, the bridge cross section was reduced to be as described in Section 2.2.9.
- The Task Force examined information provided by City traffic engineers for roundabouts at the key intersections of Via de la Valle and El Camino Real, and San Dieguito Road and El Camino Real. Although the Task Force agreed that roundabouts at these intersections are not feasible, the City decided to add a Roundabout Alternative to the recirculated EIR with the alignment set in the same location as the Eastern Alignment in order to quantify impacts and traffic operational characteristics for comparison to other build alternatives. The Roundabout Alternative is addressed at an equal level of detail as the other build alternatives in this recirculated EIR.
- In 2008 and 2009, meetings with the CDFW and USFWS were held to refine the proposed biological resources mitigation concept plan. More recent meetings have been held in 2012 and 2014, as discussed above. Modifications to the plan have been incorporated into the mitigation concept plan summarized in Section 3.12 of this recirculated EIR and discussed in more detail in the Natural Environment Study (NES), which addresses biological resources. Mitigation is planned to be accomplished on a parcel owned by the JPA. The JPA Mitigation Site, formerly known as the Boudreau property, is located west of El Camino Real and south of the San Dieguito River. Historically, this area has supported agricultural practices but has remained fallow for several years. The Roundabout Alternative would require additional acreage of wetland mitigation beyond the JPA Mitigation Site. Additional suitable mitigation opportunities exist within the project vicinity; therefore, additional off-site mitigation would be achievable for the Roundabout Alternative on a site owned by the City.

2.5.3 Summary of Revisions to the Previously Circulated Draft EIR

Revisions to the 2006 Draft EIR are summarized by section below.

Section 1: Introduction and Environmental Setting

- Revise independent utility and logical termini discussion to be a description of project boundaries.
- Refine CCC permitting discussion.
- Update cumulative projects.
- Update general vegetation in the setting.

Section 2: Project Description

- Add Roundabout Alternative.
- Change the project description to narrow the full widened roadway cross section from 122 feet to 104 feet by reducing the central median from 14 feet to 4 feet, the bike lanes from 8 feet to 6 feet, and the travel lanes from 12 feet to 11 feet.
- Change the description of the Eastern Alignment Alternative to demolish the existing bridge and allow for a cantilever trail.
- Clarify that for all alternatives, the cantilever would not be constructed as part of the project unless funding from outside sources beyond the City or the federal HBP is identified. If funding for the cantilever is not identified at the time of bridge construction, support structures (corbels) would be installed on the bridge during construction to facilitate later placement of the cantilever by others.
- Modify the drainage improvements proposed parallel to Via de la Valle.
- Add information regarding the construction process for the bridge.
- Update the History of Project Changes.

Section 3.0: General changes to all environmental analysis sections

- Add Roundabout Alternative.
- Eliminate the concept of keeping the existing bridge as a multi-use trail for the Eastern Alignment Alternative.
- Update to current City significance determination thresholds.

Section 3.1: Land Use

- Update regulatory setting and land uses.
- Add analysis of consistency with 2008 General Plan.
- Eliminate analysis of consistency with previous General Plan.
- Update Proposed Projects.
- Update Horsepark discussion to include the 2008 Master Plan for Del Mar Fairgrounds and Horsepark.
- Update Polo Club fields discussion to include Surf Cup Soccer activities on the City's property.
- Eliminate discussion of resources evaluated for the requirements of Section 4(f). This discussion will be in the separate Environmental Assessment.

Section 3.2: Traffic/Circulation

• Update traffic analysis with new traffic numbers based on November 2011 counts.

Section 3.3: Visual/Aesthetics

• Update analysis.

Section 3.4: Historical Resources

- Include the updated Records Search.
- Update to current City mitigation measures.

Section 3.5: Farmlands/Agricultural Lands

• Update for current fallow condition of JPA Mitigation Site that had been farmed in tomato fields.

Section 3.6: Public Utilities/Services

• Add information provided by Santa Fe Irrigation District in 2006 and update solid waste existing conditions.

Section 3.7: Hydrology/Water Quality

• Update with current hydraulic analysis and revised local drainage concepts.

Section 3.8: Geology/Seismicity/Soils

• Revise hazardous materials discussion.

Section 3.9: Paleontological Resources

• Update to current City mitigation measures.

Section 3.10: Air Quality

• Update with new Air Quality Technical Report.

Section 3.11: Noise

• Update with new Noise Technical Report.

Section 3.12: Biological Resources

- Update with the 2015 Natural Environment Study, which revised biological resources mapping and analysis, including jurisdictional delineation; identification of vegetation types, vegetation communities of concern, sensitive plants and wildlife; and determination of impacts acreage for each alternative.
- Revise mitigation ratios.
- Revise the mitigation concept plan.

Section 3.13: Greenhouse Gas Emissions

• Add new section.

Section 4: Mandatory CEQA Discussion Areas

- Update Cumulative impacts analysis.
- Update Significant Unavoidable Impacts.
- Add discussion of Irreversible Environmental Changes Which would Result if the Project is Implemented

Section 5: Alternatives

- Add Task Force alternatives to alternatives considered but rejected.
- Change Environmentally Superior Alternative discussion.
- Update Table 5-1.

Section 6: Mitigation Monitoring and Reporting Program

• Update for current City requirements and mitigation measures.

Section 7: References

• Update to add new references.

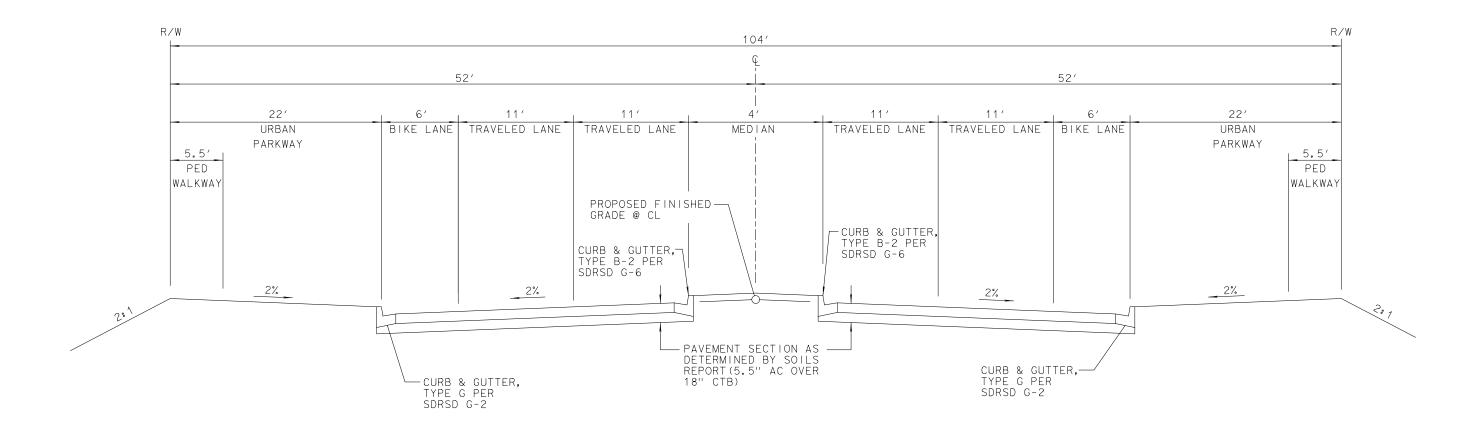
Section 8: Individuals and Agencies Consulted

• Update to add new individuals and agencies

Section 9: Certification Page

• Update to add individuals and firms involved in the recirculated EIR and new/updated supporting technical studies.

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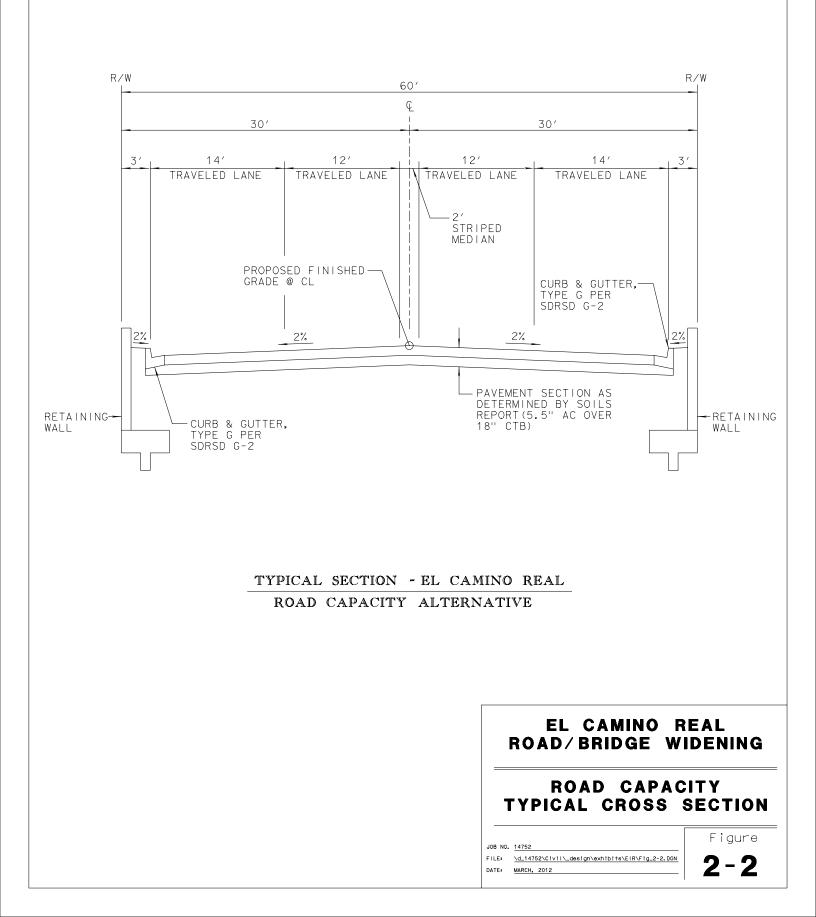


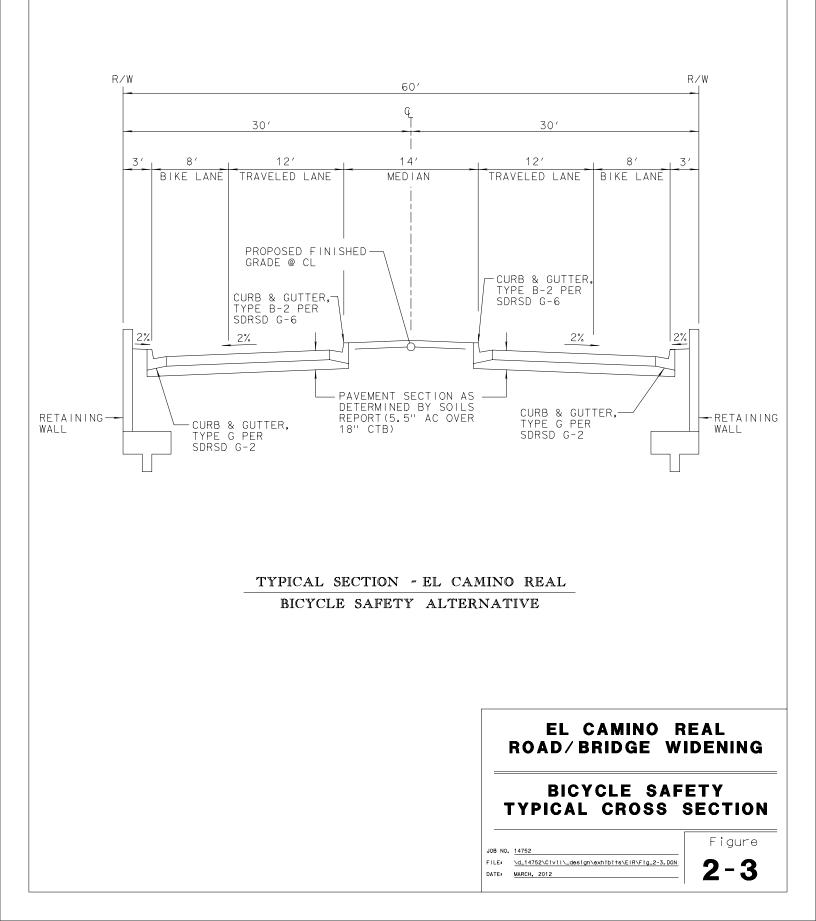


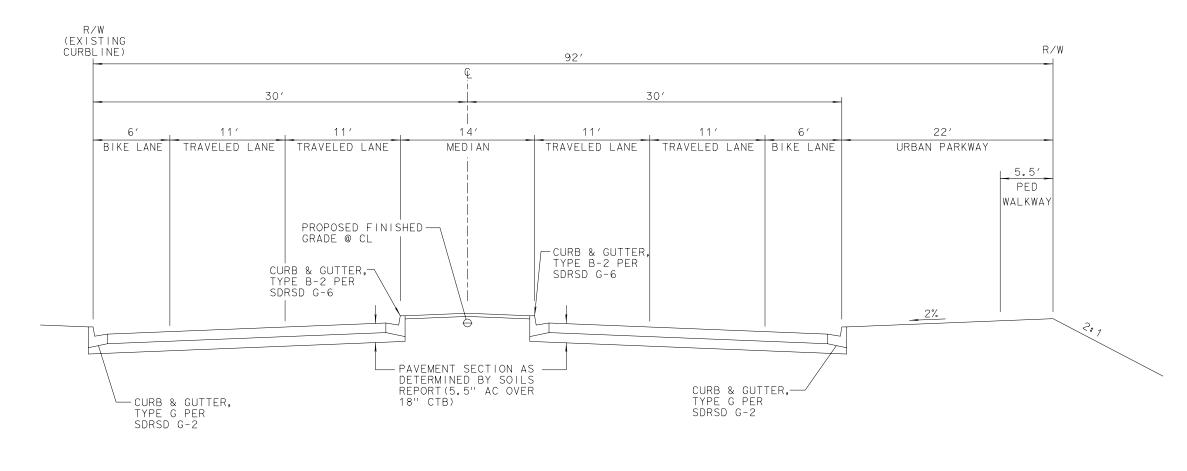
EL CAMINO REAL Road/bridge widening

FULL WIDENED ROADWAY Typical cross section

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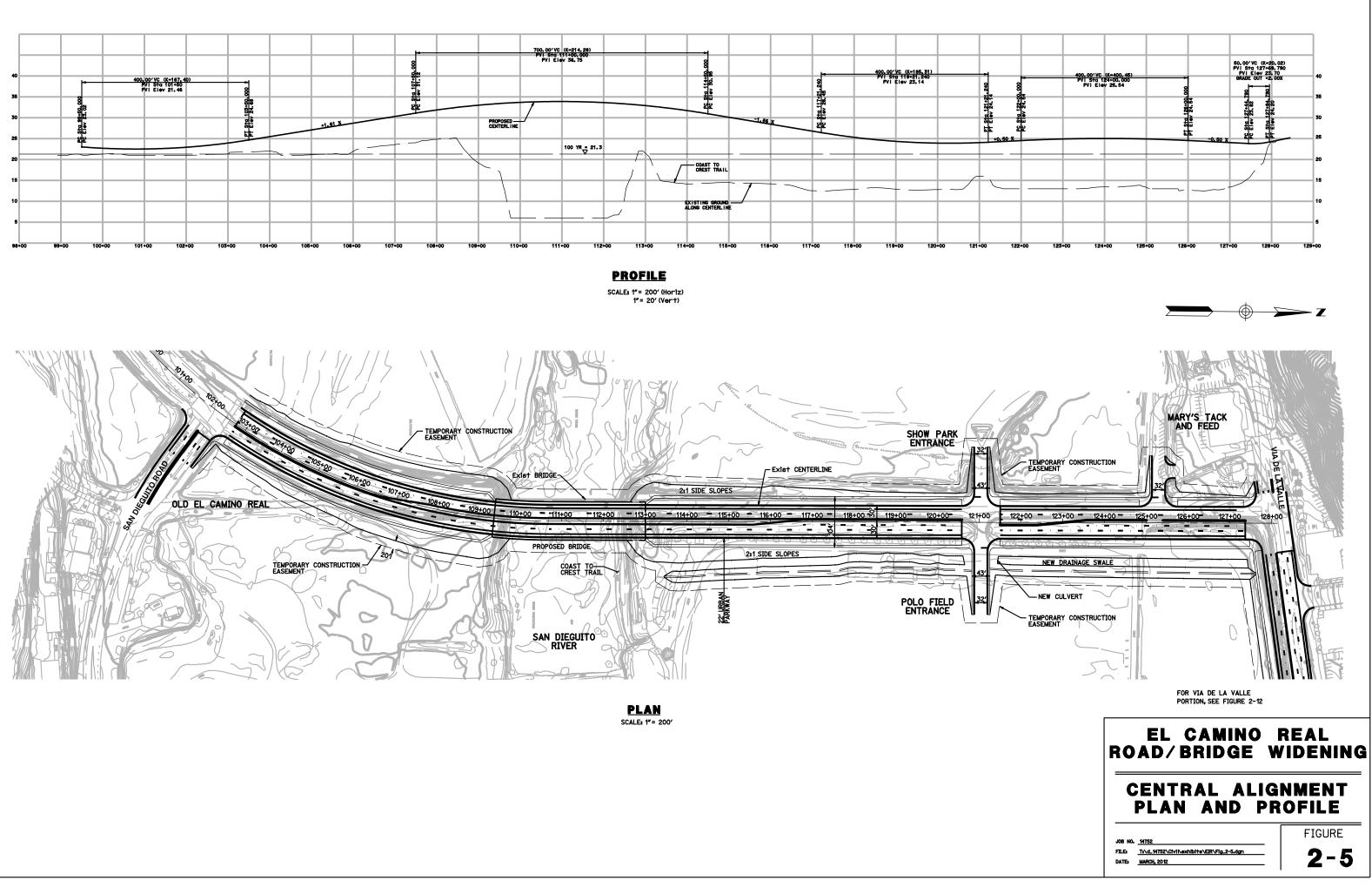
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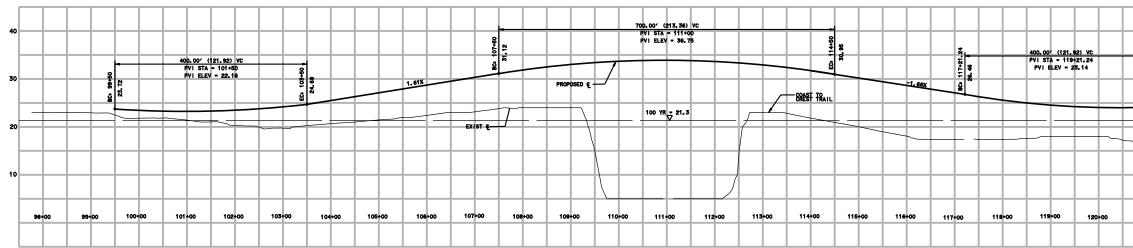
EL CAMINO REAL Road/bridge widening

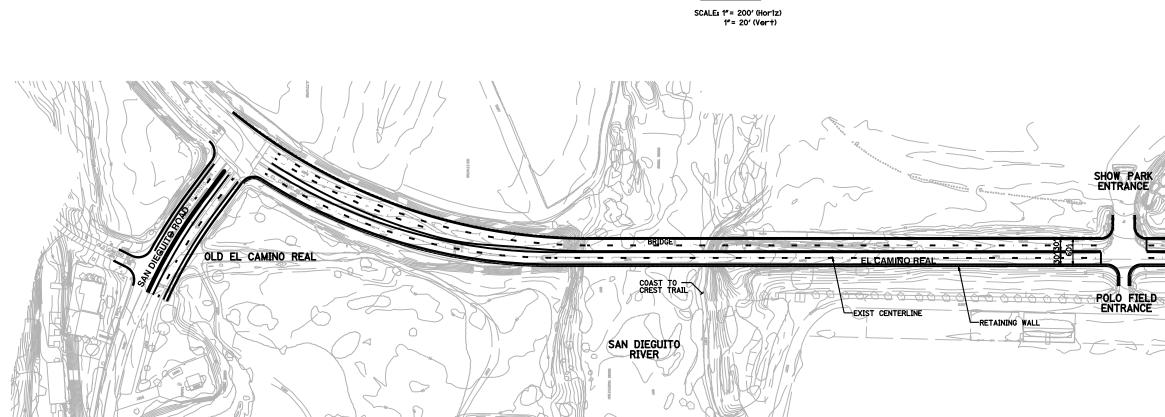
VIA DE LA VALLE Typical cross section

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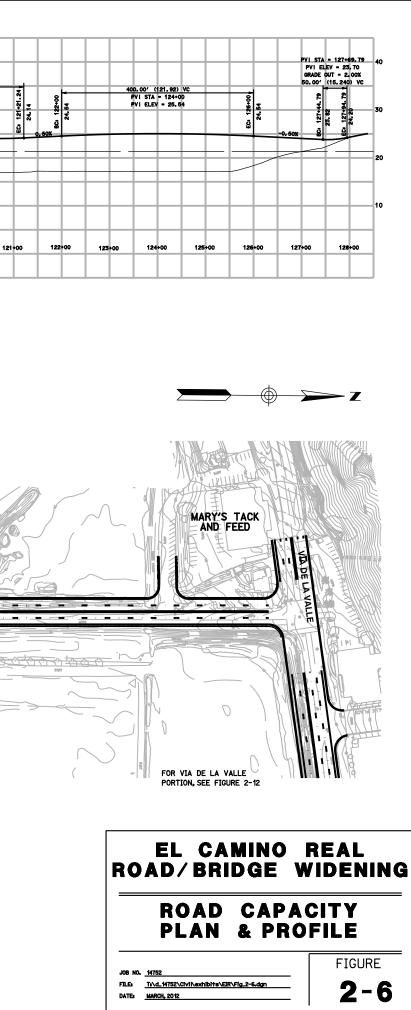


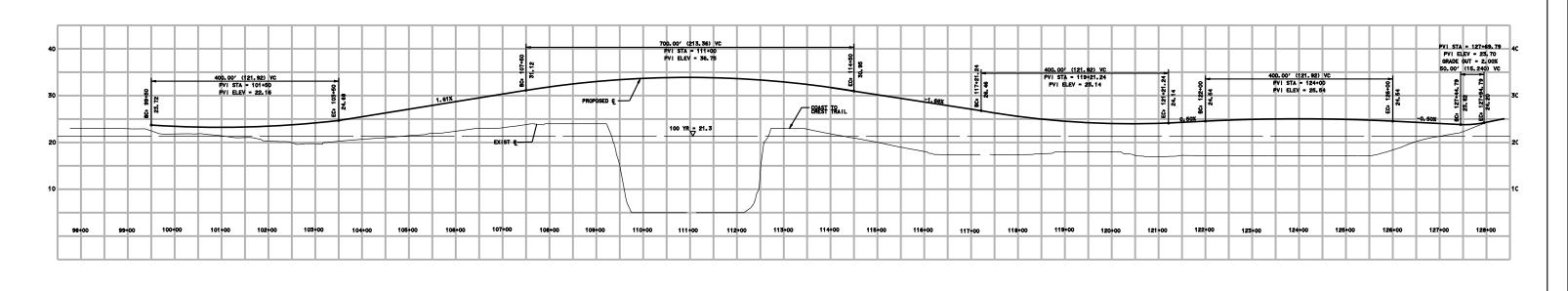




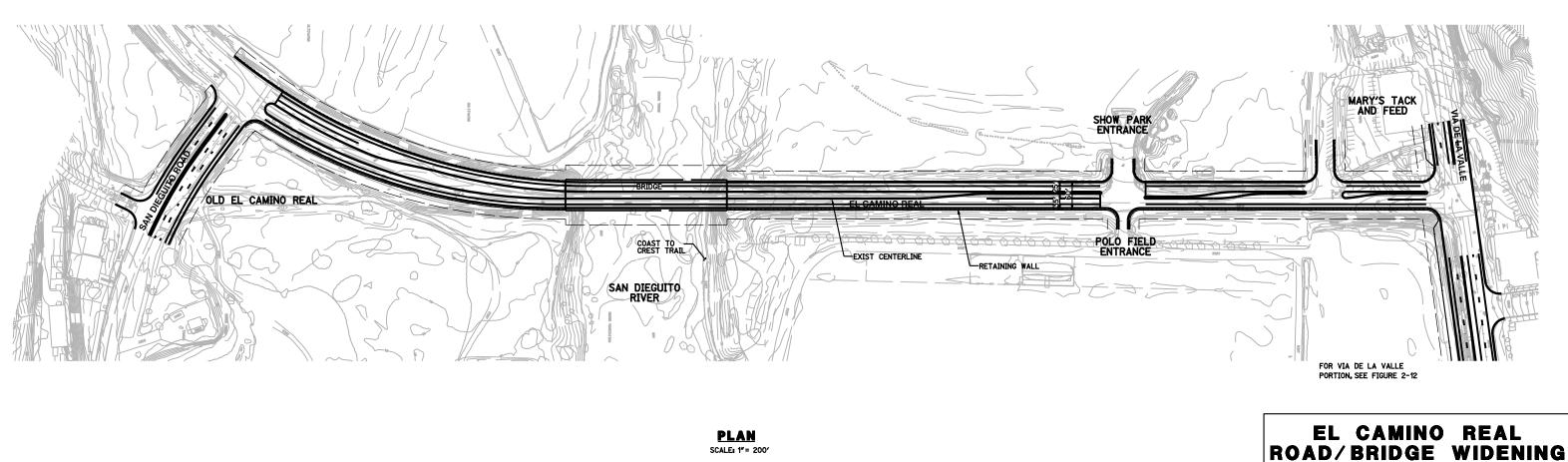
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PROFILE





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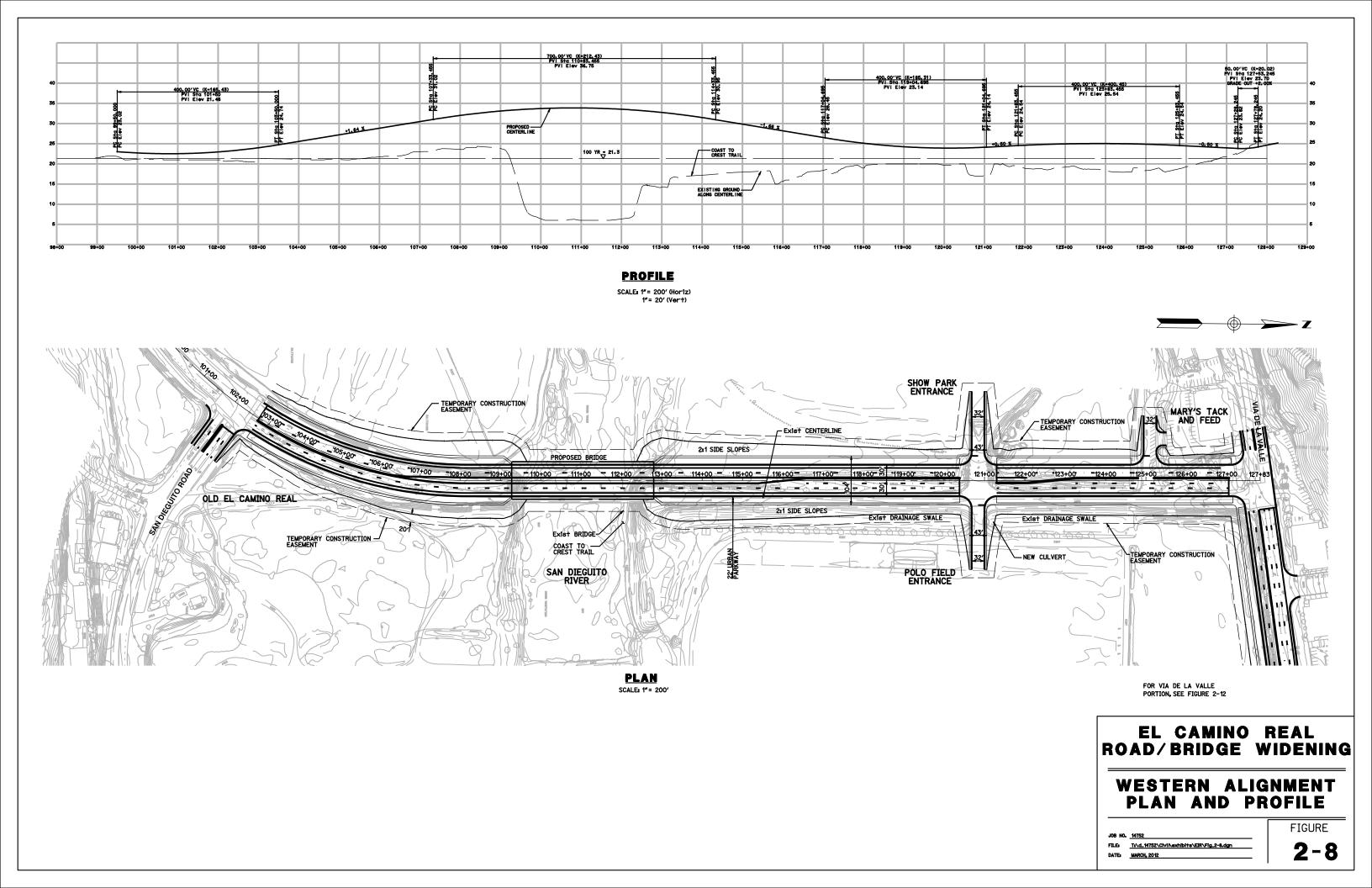


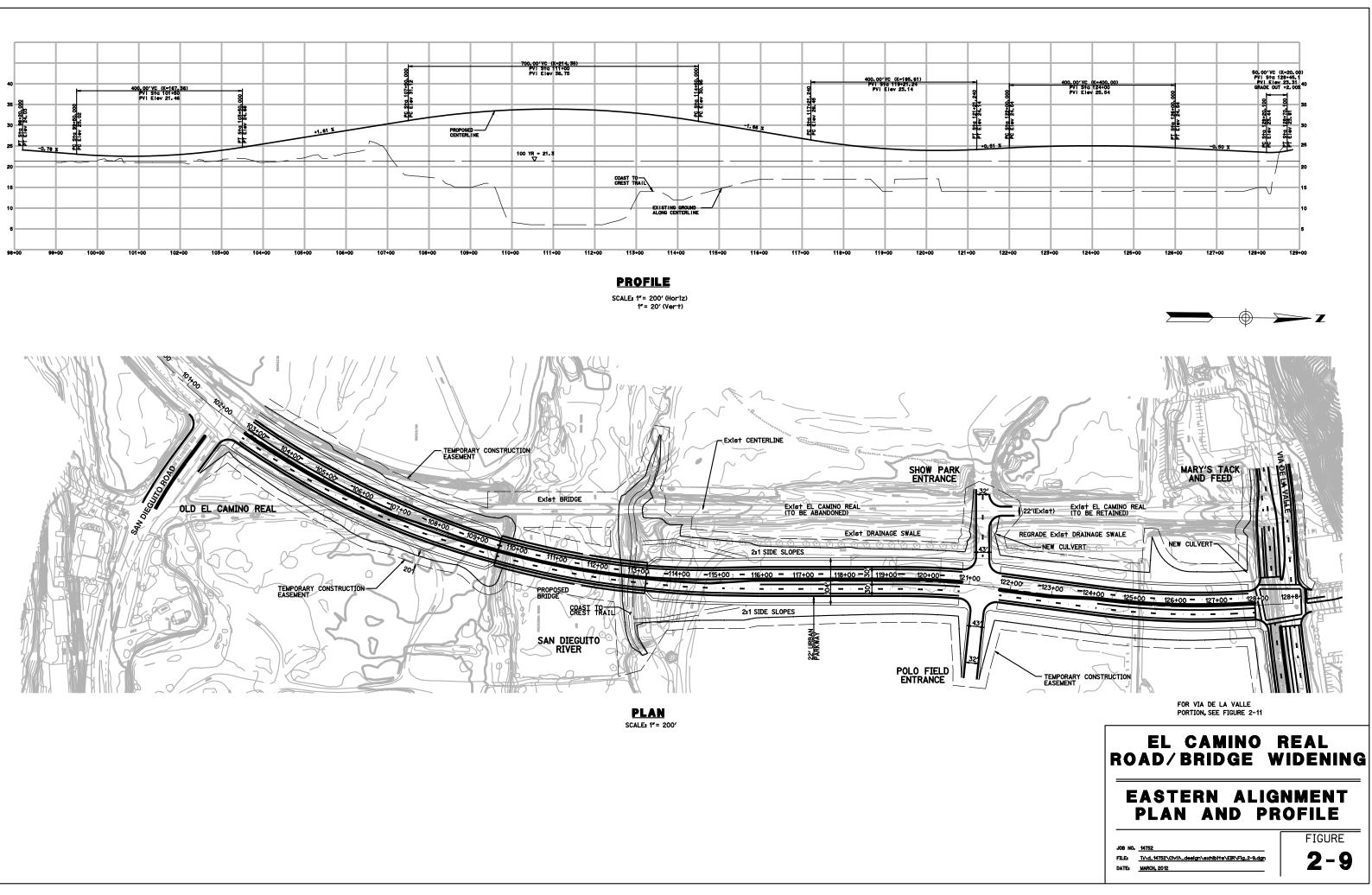
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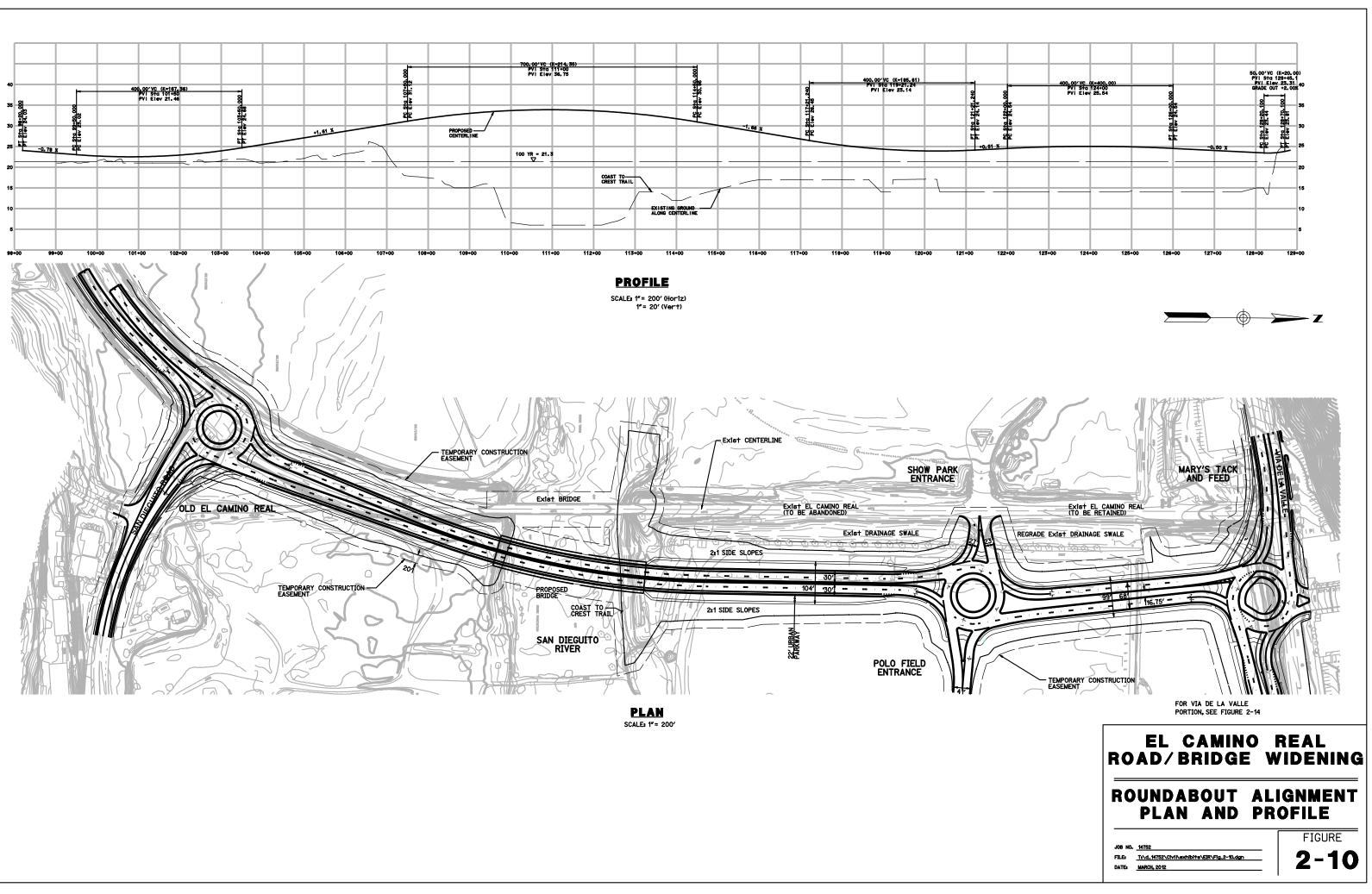
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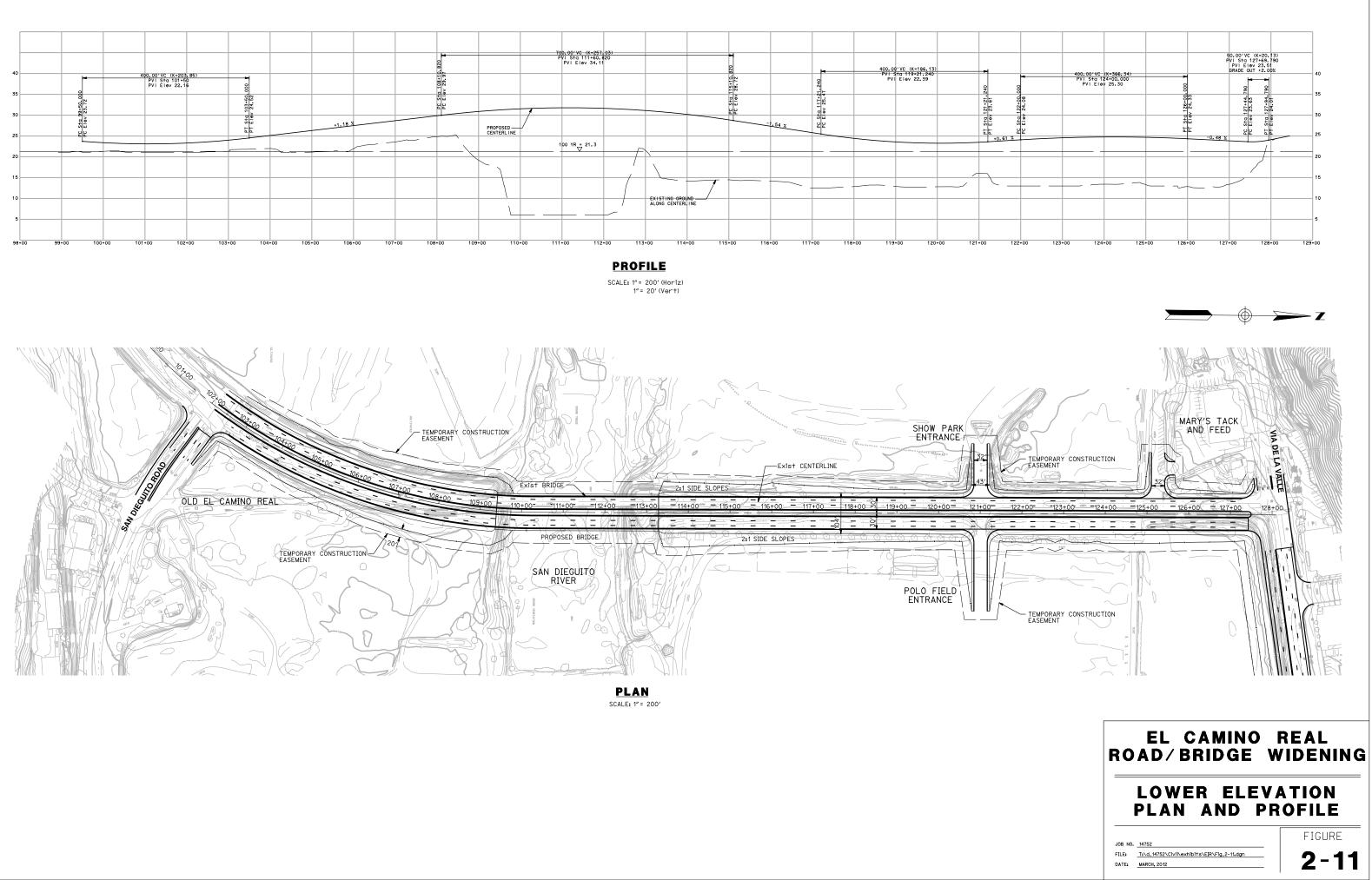
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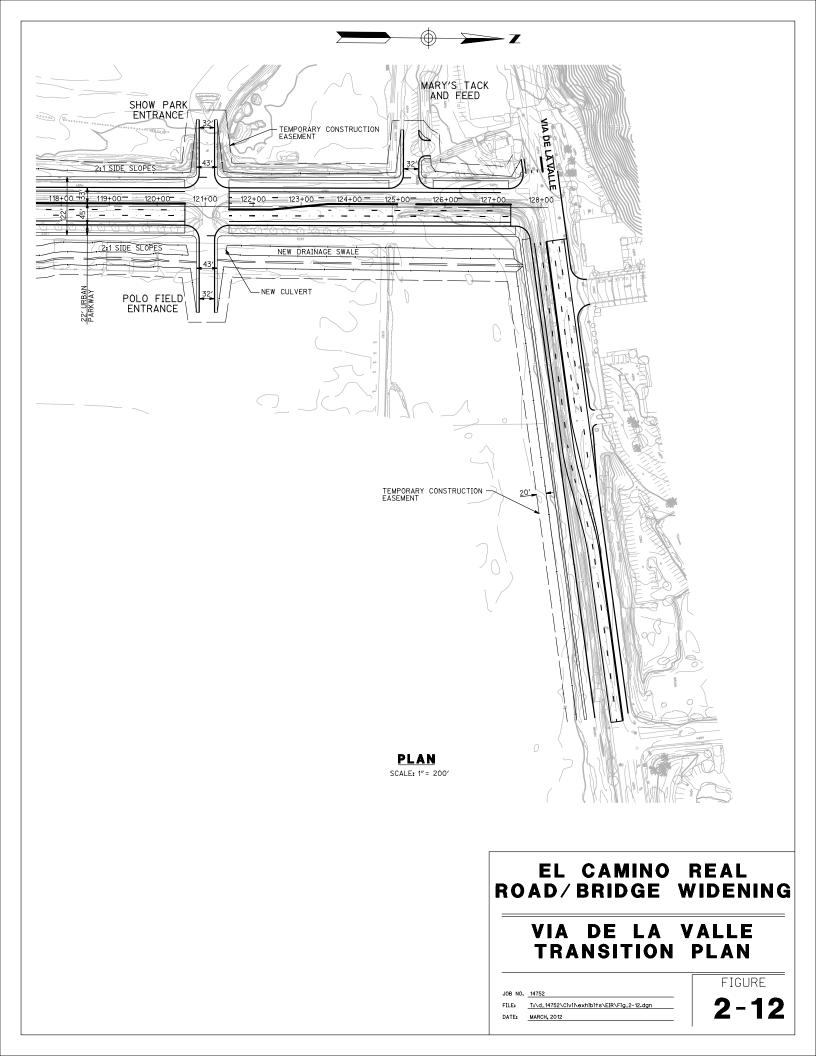
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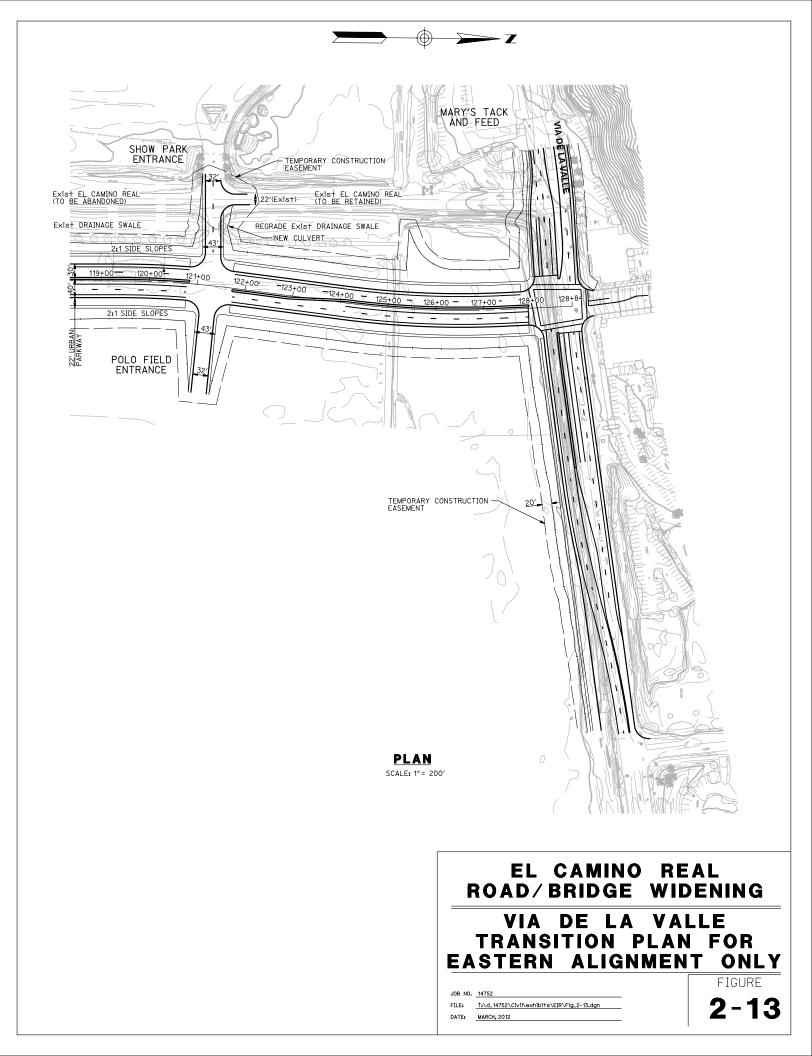


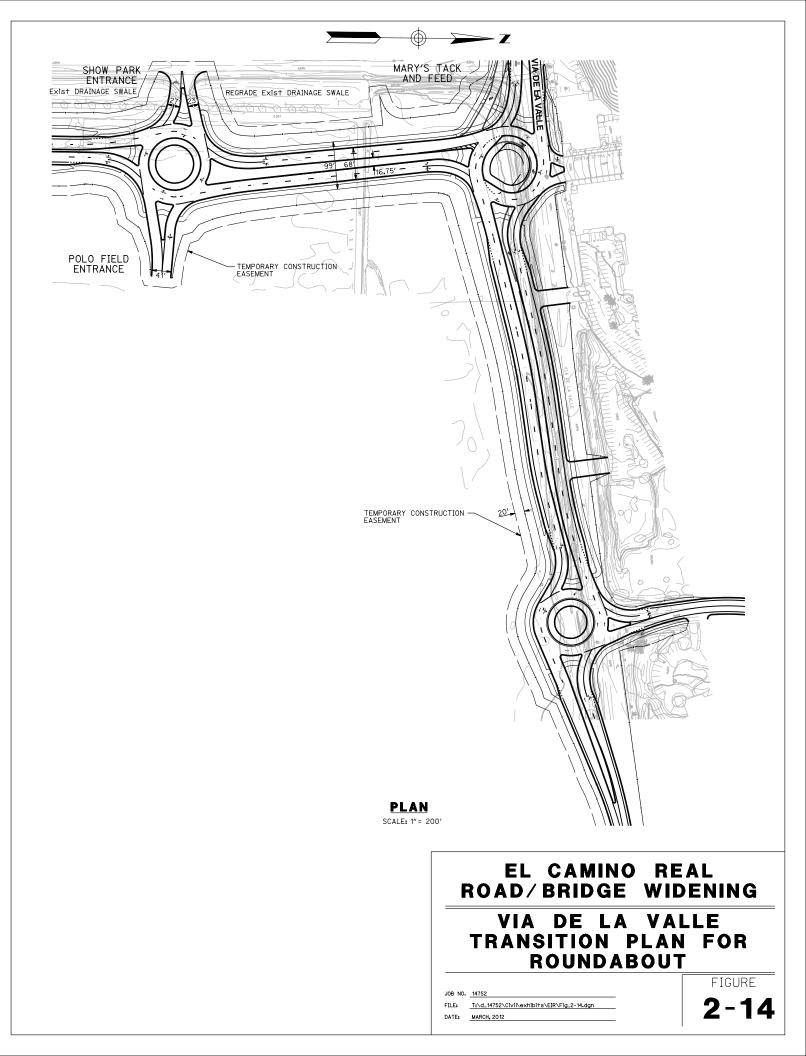


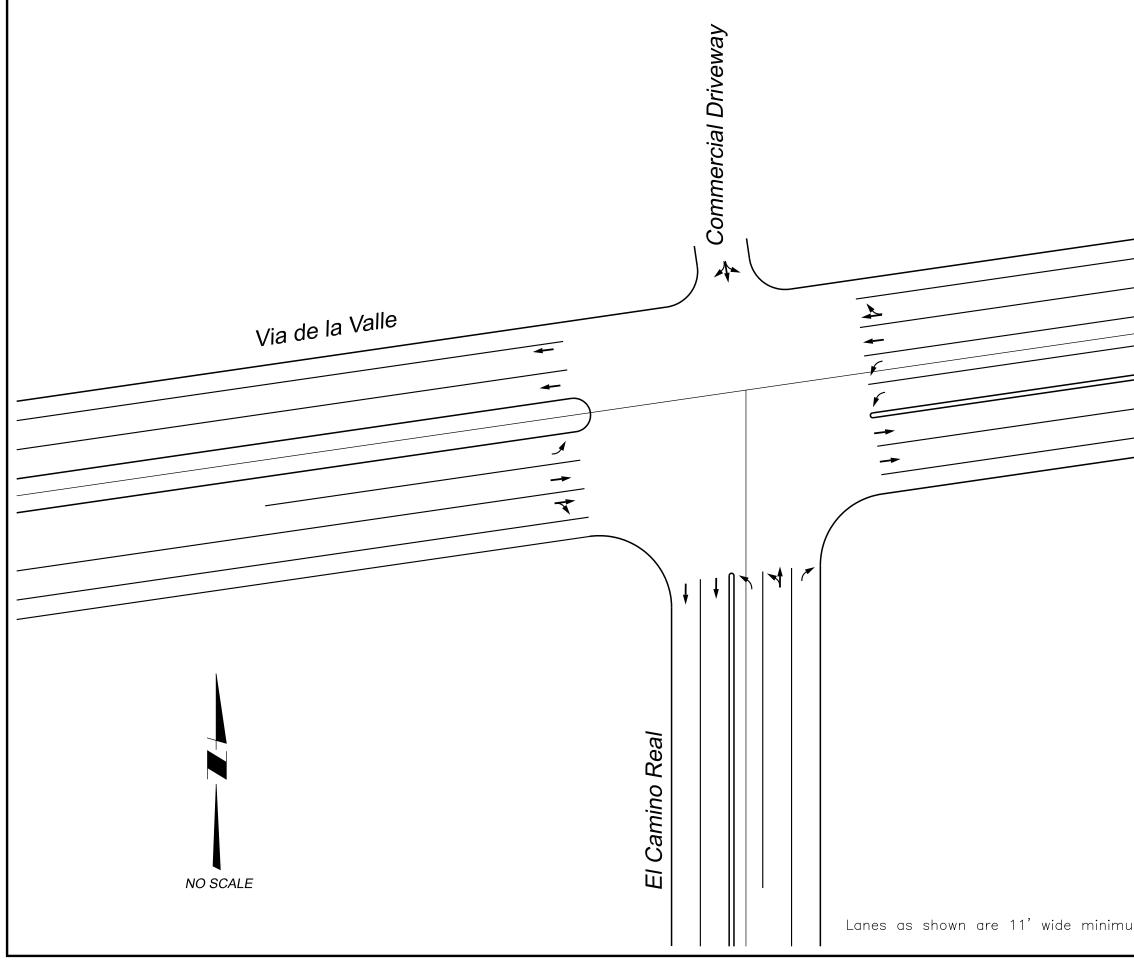




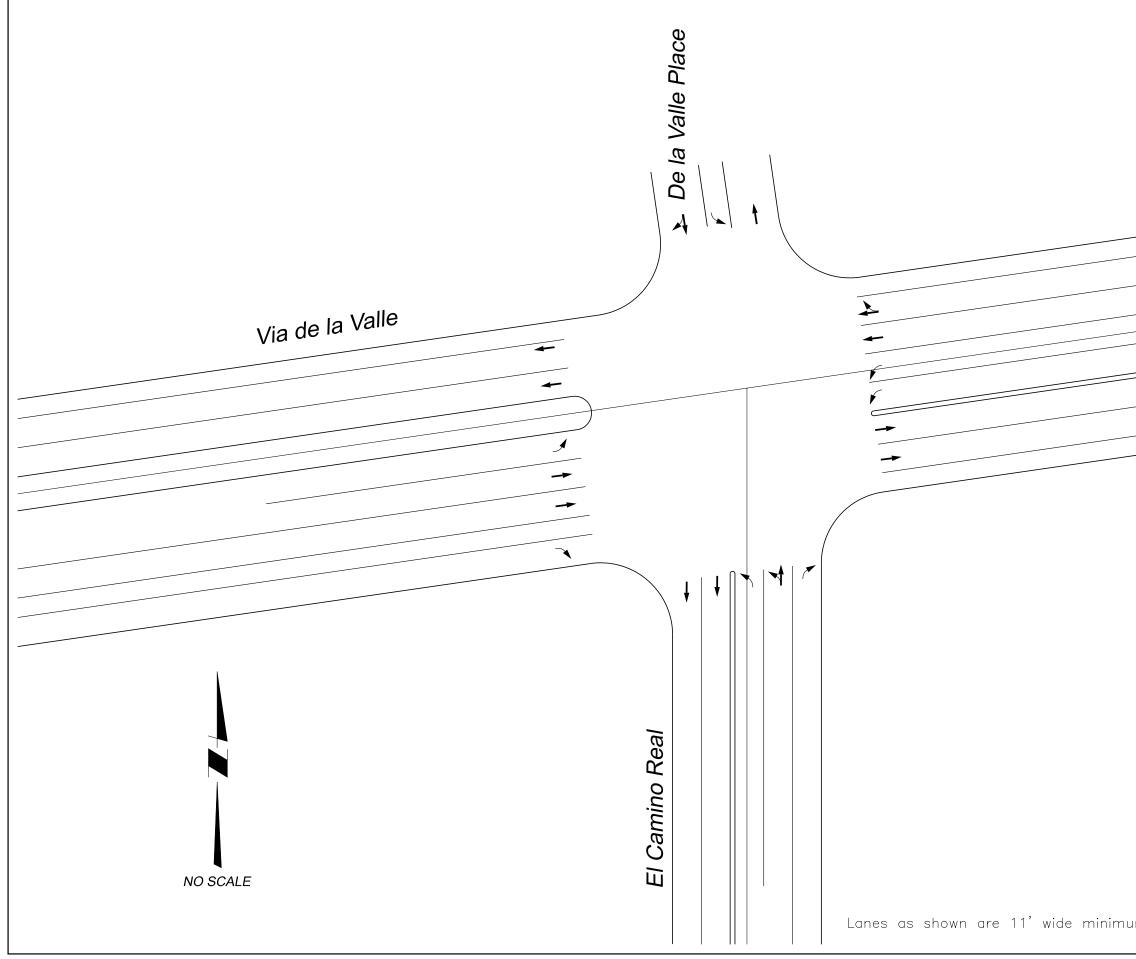




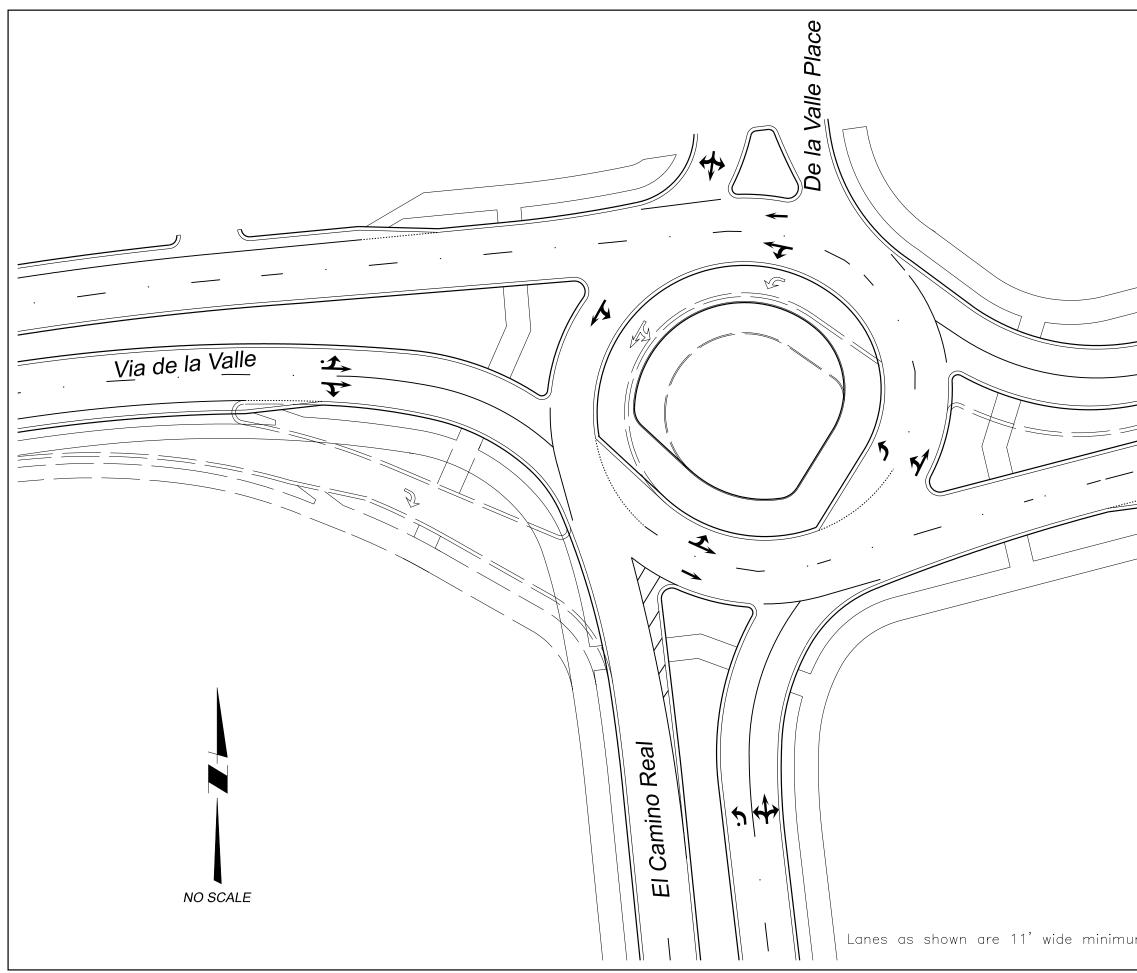




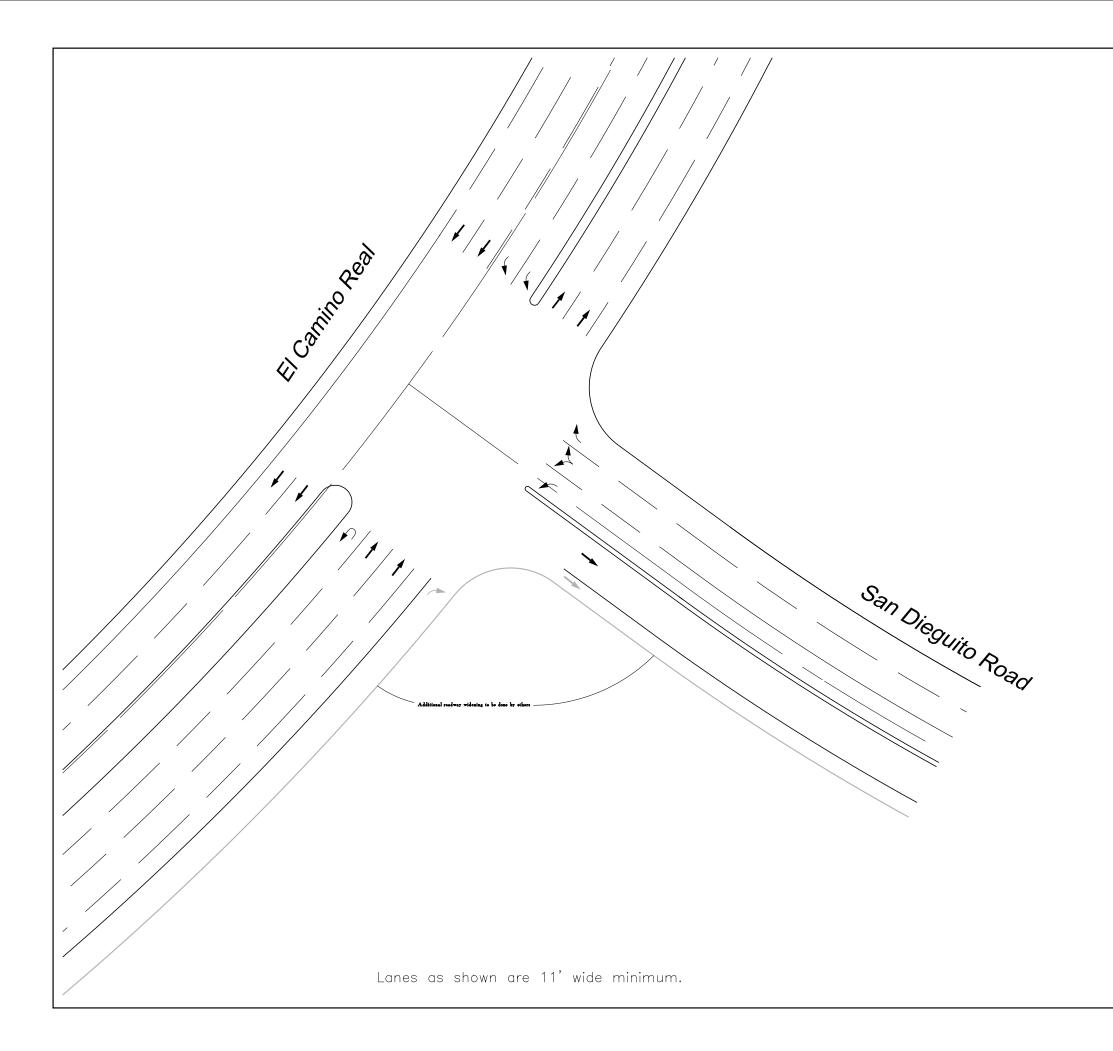
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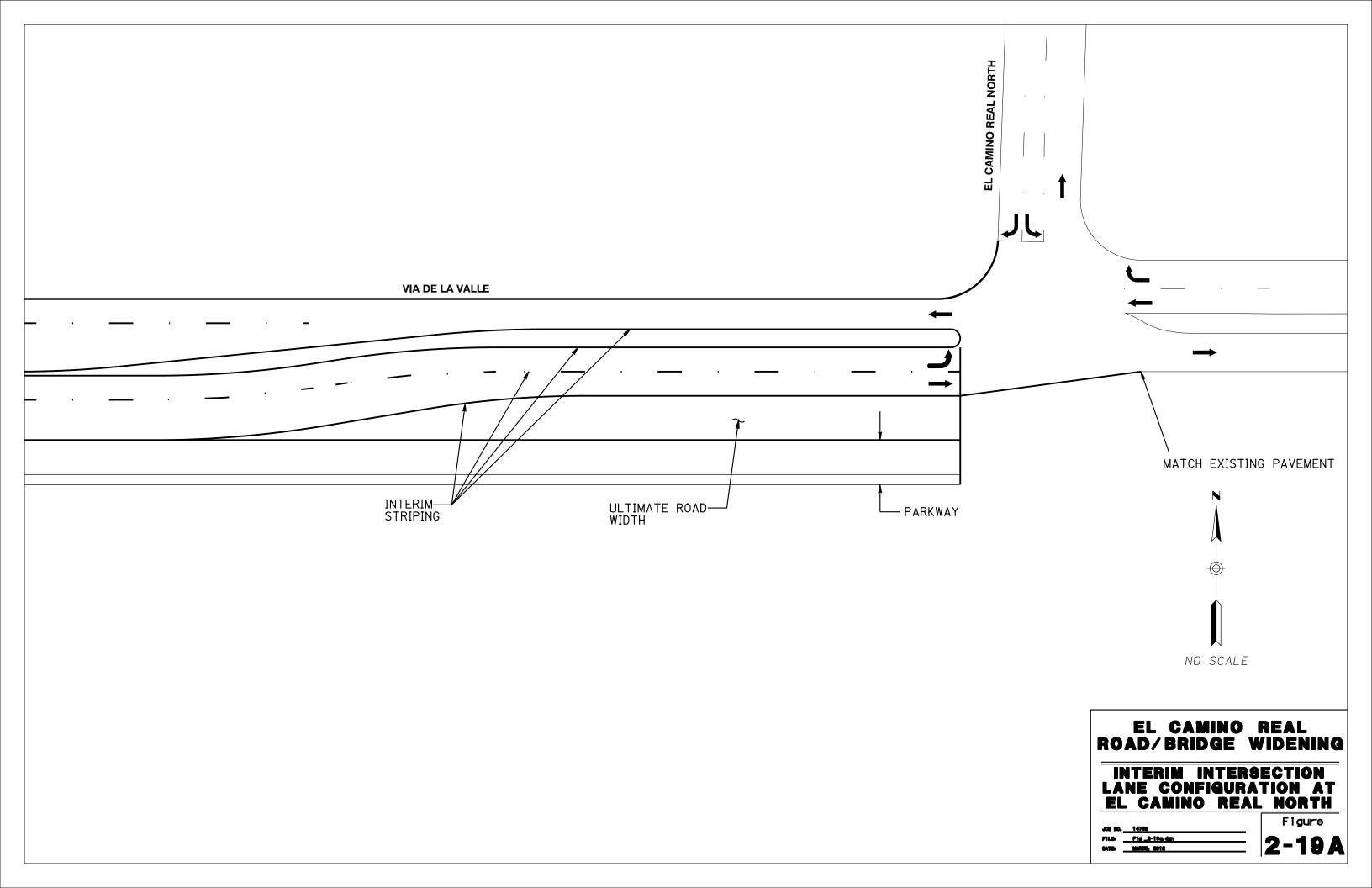


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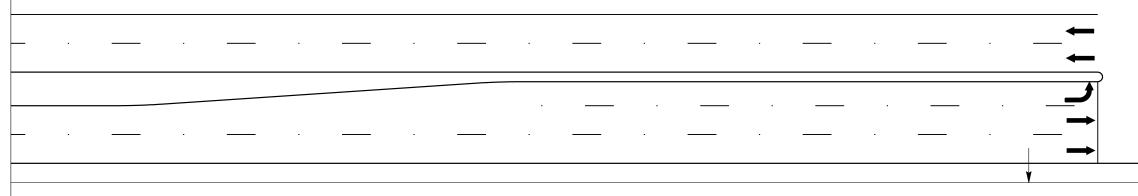


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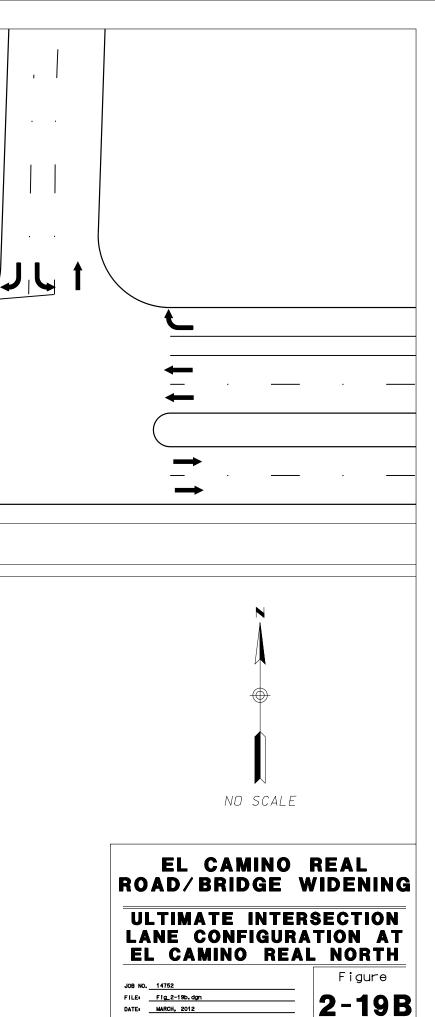


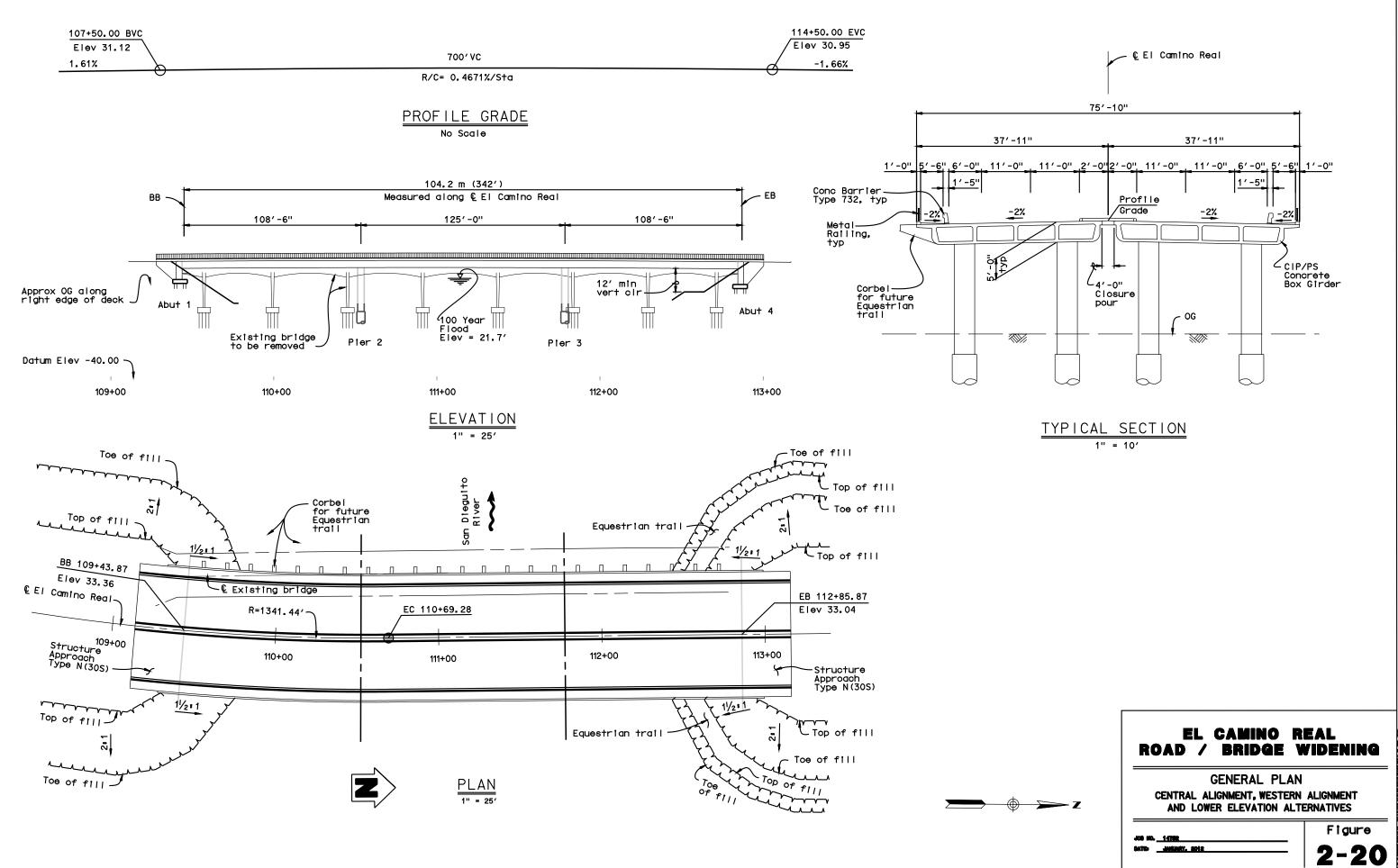


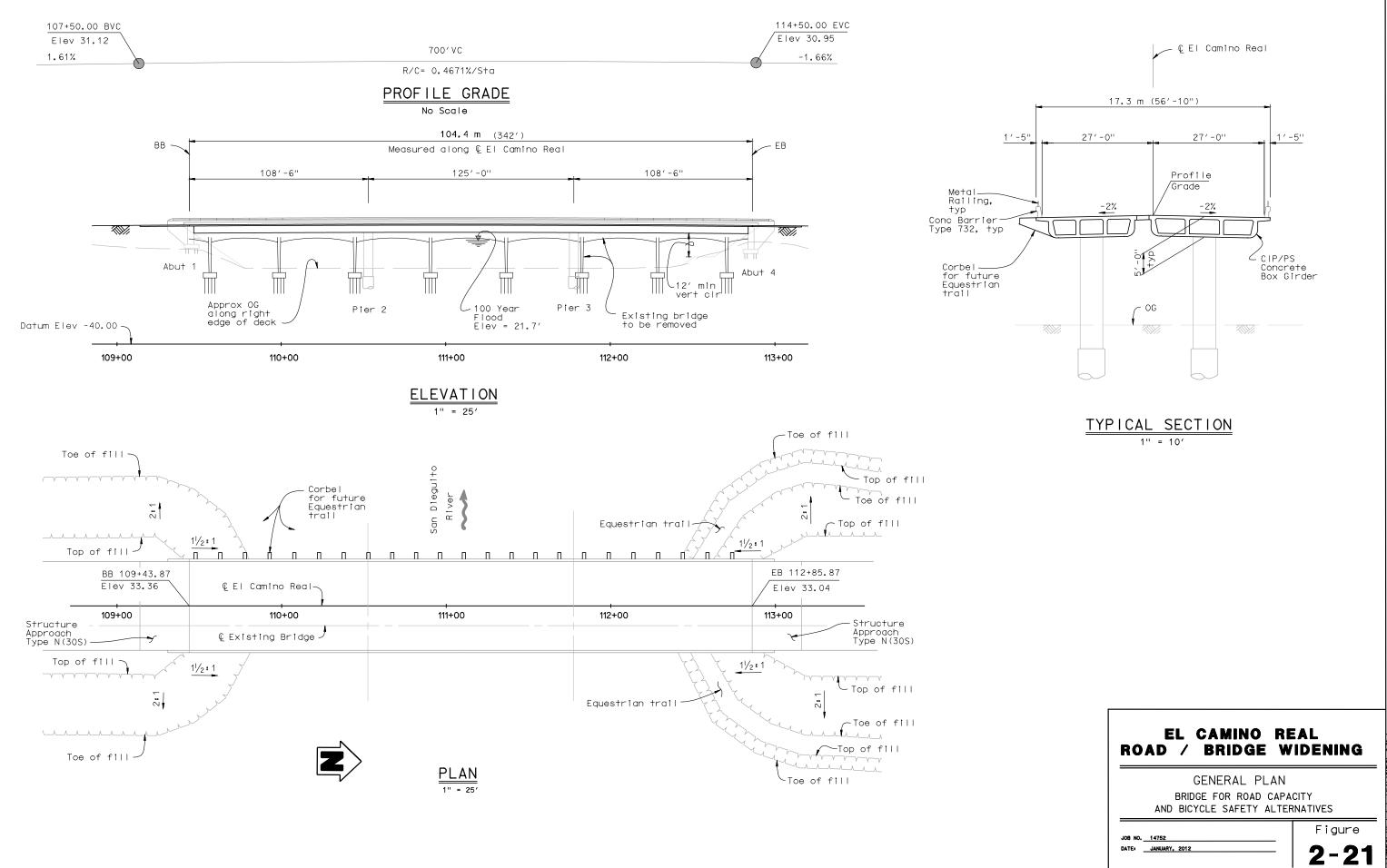


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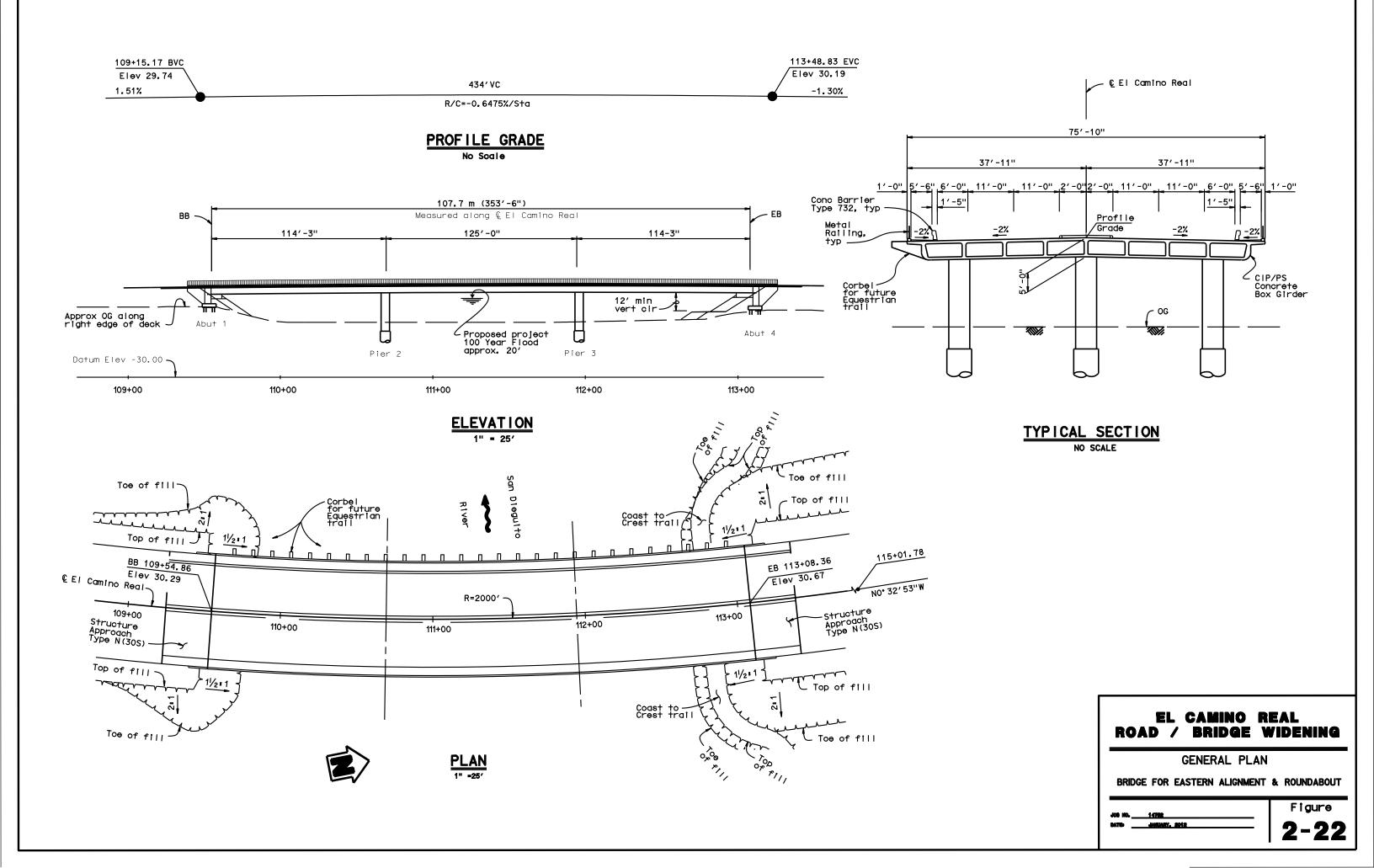


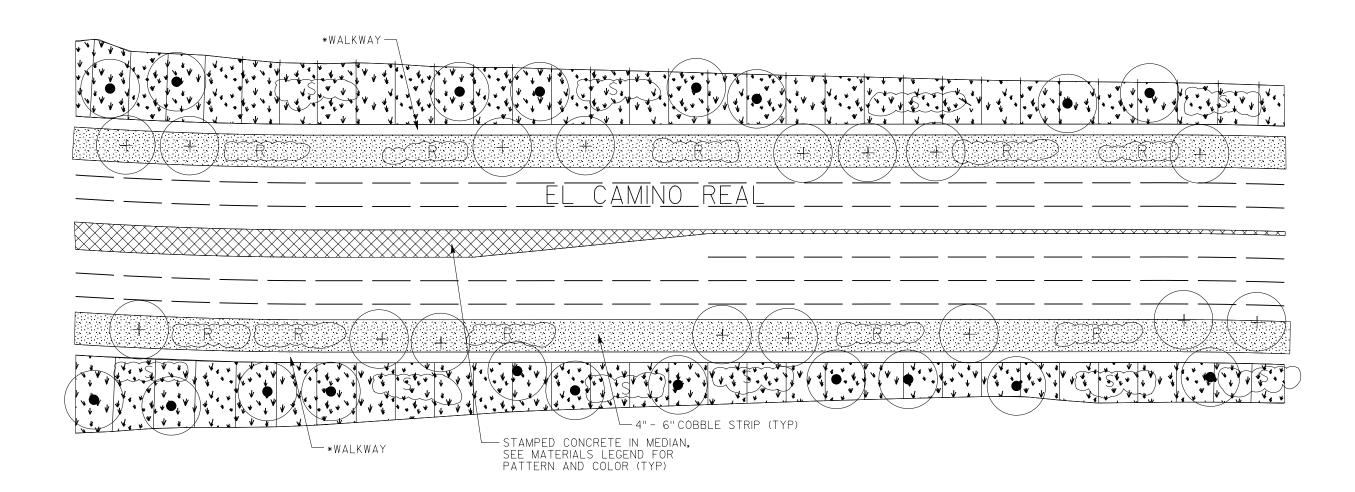






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PLANT / MATERIALS LEGEND

	DESCRIPTION	% / SIZE	DESCRIPTION	% / SIZE
+	TREES STREET TREES SUCH AS: QUERCUS AGRIFOLIA / COAST LIVE OAK	100% * 24′ B0X	HYDROSEED MATERIAL	100%
	SLOPE TREES SUCH AS: PINUS TORREY ANA / TORREY PINE ADENOSTOMA SPARSIFOLIUM / REDSHANKS CERCIS OCCIDENTALIS / WESTERN REDBUD SHRUBS / GROUNDCOVERS	75% * 24′BOX 25% * 15 GAL.	PAVING / HARDSCAPE MATERIALS SUCH AS: BOMANITE, BOMACRON STAMPED CONCRETE - RIVER STONE PATTERN OR APPROVED EQUAL. COLOR TO BE C-25 (SOMBRERO BUFF) OR APPROVED EQUAL.	
	ROW SMALL SHRUBS SUCH AS: BACCHARIS PILULARIS / COYOTE BUSH FESTUCA CALIFORNICA / CALIFORNIA FESCUE ERIOGONUM FASCICULATUM / CALIFORNIA BUCKWHEAT SISYRINCHIUM BELLUM / BLUE EYED GRASS EPILOBIUM CANUM / CALIFORNIA FUSCHIA	75% * 5 GAL. 25% * 1 GAL. 12'-3' 0.C.	4" - 6" COBBLE. COBBLE TYPE TO BE DETERMINED DURING CONSTRUCTION DOCUMENT PHASE.	
	SLOPE NATIVE SHRUBS SUCH AS: ARCTOSTAPHYLOS DENSIFLORA 'HOWARD McMINN' CEANOTHUS 'JOYCE COULTER' / 'JOYCE COULTER' WILD LILAC SALVIA SONOMENSIS / CREEPING SAGE SALVIA APIANA / WHITE SAGE •HETEROMELES ARBITUFOLIA / TOYON OPUNITA FISCUS-INDICA / INDIAN FIG •QUERCUS BERBERIFOLIA / SCRUB OAK YUCCA-WHIPPLE / OUR LORD'S CANDLE	100% * 5 GAL. 4′0.C.		
	ALL SLOPE/NATIVE SHRUB MASSES SHALL INCLUDE A MIN.OF 30% OF STARRED SHRUBS			

El Camino Real Road / Bridge Widening

Conceptual Parkway Landscape Plan (Typical)

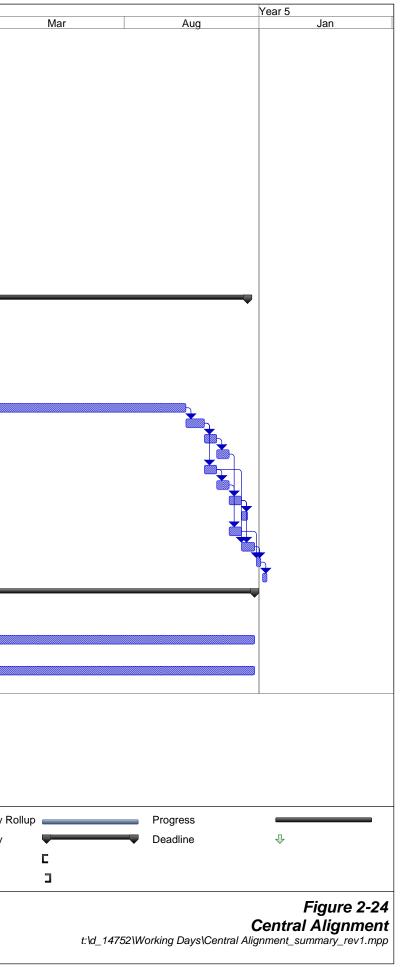
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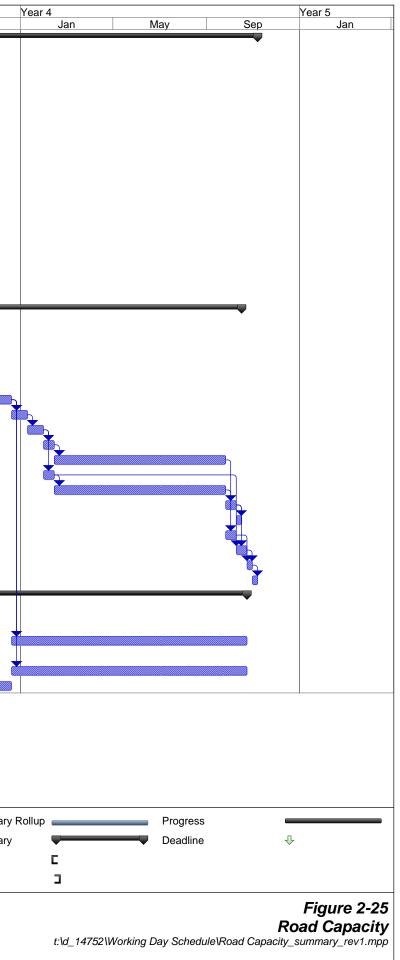
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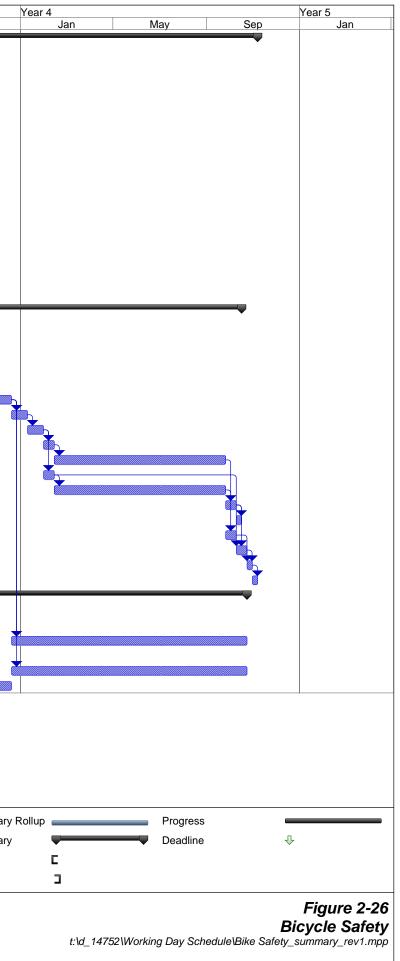
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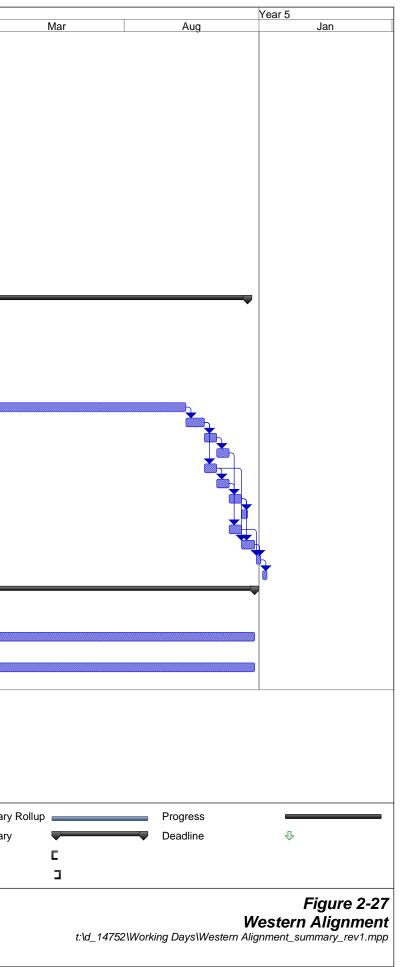
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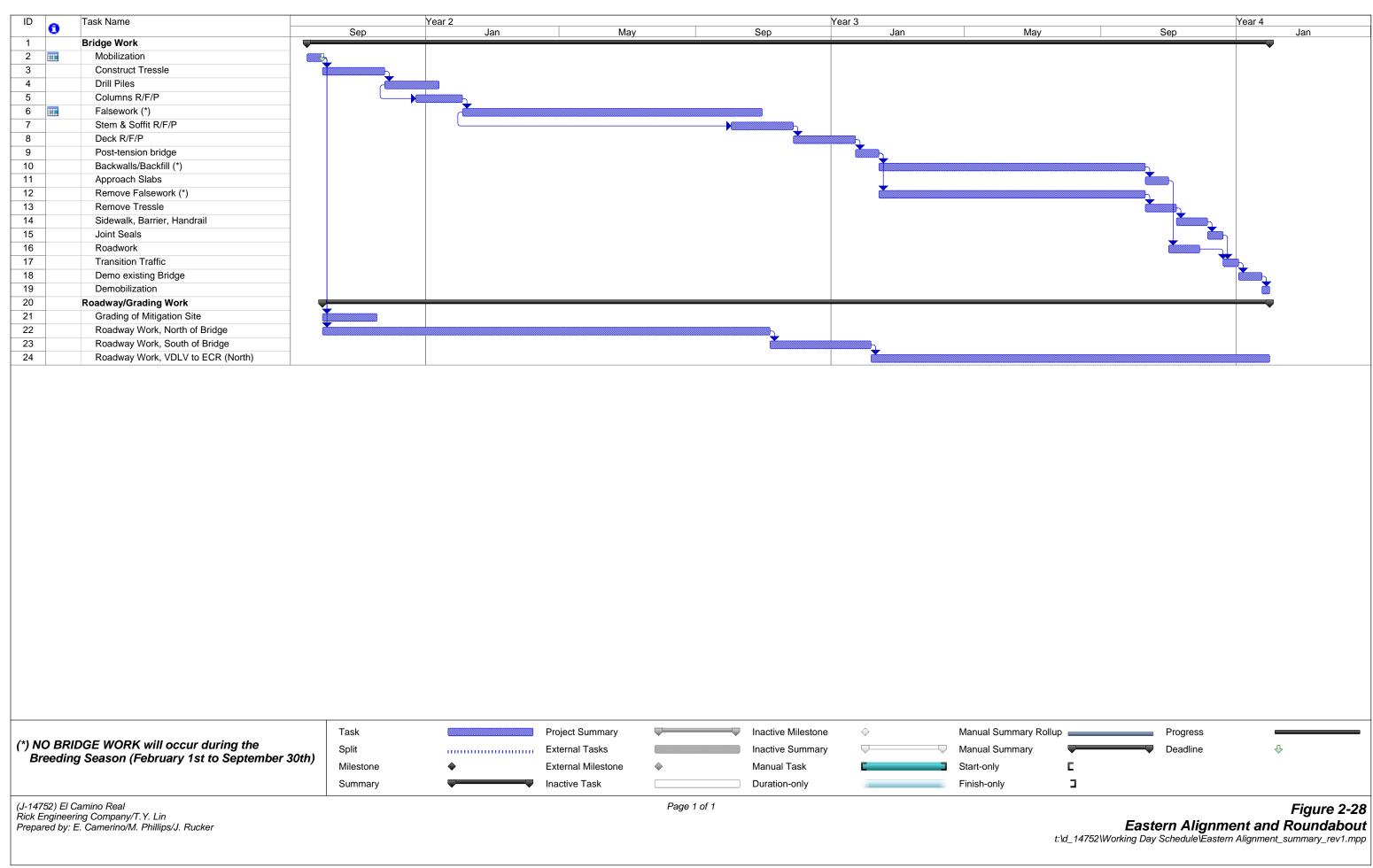


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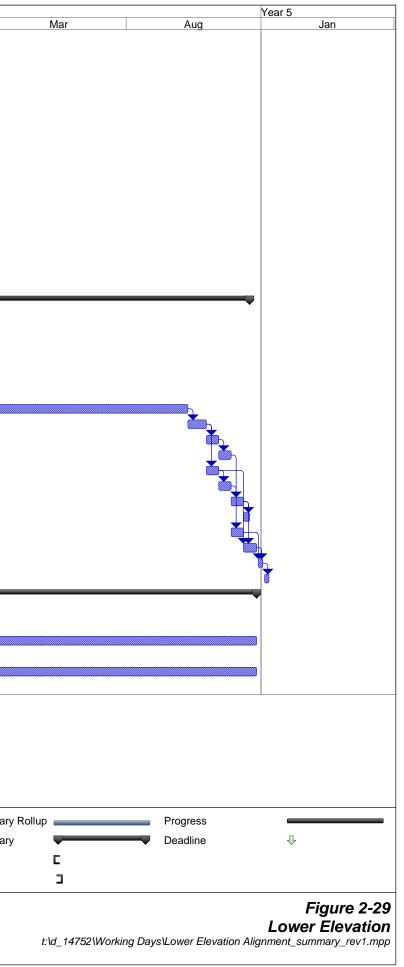


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SECTION 3 ENVIRONMENTAL ANALYSIS

This section encompasses detailed analysis of all build alternatives in terms of the following environmental issues, listed by subsection number:

- 3.1 Land Use
- 3.2 Traffic/Circulation
- 3.3 Visual/Aesthetics
- 3.4 Historical Resources
- 3.5 Farmlands/Agricultural Lands
- 3.6 Public Utilities/Services
- 3.7 Hydrology/Water Quality
- 3.8 Geology/Seismicity/Soils
- 3.9 Paleontological Resources
- 3.10 Air Quality
- 3.11 Noise
- 3.12 Biological Resources
- 3.13 Greenhouse Gas Emissions

Regulatory setting, affected environment, impacts, significance under CEQA, and mitigation are addressed within each subsection. Cumulative effects are discussed in Section 4.4.

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3.1 LAND USE

This section includes an evaluation of the physical and policy-level impacts of the proposed project on existing, planned, and proposed land uses in the study area. Conflicts with established recreational, educational, religious, or scientific uses of the study area are identified. Also addressed is consistency with adopted plans, including the City of San Diego San Dieguito River Regional Park Plan and goals and objectives adopted by the San Dieguito River Park JPA. The primary local regulatory land use planning framework for the project's biological resources is the City of San Diego Multiple Species Conservation Program (MSCP) and habitat preserve known as the Multi-Habitat Preserve Area (MHPA). Consistency of the project with requirements of the City's MSCP requirements and MHPA guidelines is discussed in Section 3.1.3.9.

Land uses can include open space, rangeland, and other vacant or undeveloped areas, along with developed uses for residential, commercial, public, agricultural, institutional, recreational, and other types of activities. This analysis utilizes the following key definitions:

- Existing land uses are those occurring in the study area at the time the EIR originally was prepared (2003), and updated for this recirculated EIR (2012). Parcels potentially affected by the project are shown in Figure 3.1-1.
- Planned land uses are designated by long-range planning documents and reflect the manner in which governmental organizations foresee development will occur in the future.
- Proposed land uses (projects) are specific development proposals recently approved or currently under consideration for approval by governmental agencies at the time the EIR originally was prepared (2003), and updated for this recirculated EIR (2012). Proposed projects in the vicinity and projects that were included in the 2006 Draft EIR but are now completed are identified in Figure 3.1-2.

The project-specific land use study area was defined as the parcels that are adjacent to the segment of El Camino Real from Via de la Valle to San Dieguito Road, plus commercial and residential properties adjacent to Via de la Valle on the south and north from 450 feet west of the intersection with El Camino Real, and extending eastward past the intersection with El Camino Real North. The NCFUA of the City of San Diego, plus the Fairbanks Country Club Specific Plan area and downstream portion of the San Dieguito River Valley, encompass the study area for planned and proposed land uses.

3.1.1 Regulatory Setting

Land use planning and development approval is guided by federal, state, and local governmental agencies and their adopted policies and ordinances. Long range planning documents provide goals, policies, implementation procedures, and regulatory controls to guide and enforce conformance. Federal and state agencies utilize executive orders, various laws and mandates, management plans, and master plans to govern land use decisions within their jurisdictions.

For the City of San Diego, the overall guiding document at the time of circulation of the 2006 Draft EIR was the City of San Diego Progress Guide and General Plan (City of San Diego 1989), originally approved by the City Council in February, 1979, and updated and reprinted in June, 1989. The City Council had also adopted the Strategic Framework Element, which was intended to update the General Plan and guide the City in accommodating future growth. A comprehensive update to the City's General Plan was approved by City Council on March 10, 2008. Planned land uses designated in the project area by the 2008 General Plan are illustrated on Figure 3.1-3.

The NCFUA Framework Plan (City of San Diego 1995) is the primary community-specific land use plan within the areas to the west, north, and south of existing El Camino Real, as illustrated in Figure 1-3. Other Community Plan Areas in the vicinity of the project include Fairbanks Ranch Country Club, Pacific Highlands Ranch, Via de la Valle, and San Dieguito (Figure 3.1-4). Within the NCFUA, the Framework Plan identifies various subareas for preparation of more detailed land use plans. The alignment of existing El Camino Real affected by the project is along the eastern boundary of Subarea II, the San Dieguito Area. The Framework Plan identifies the San Dieguito area for open space, recreational and low density residential uses. Although there are more detailed plans for other subareas in the NCFUA, there is no subarea plan for Subarea II (Joyce, Personal Communication 2003).

The Fairbanks Country Club Specific Plan (City of San Diego 1982) guides land use for areas east of existing El Camino Real affected by the project, including the golf course and polo fields within areas designated open space. The specific plan was developed by Watt Industries, the master developer of the golf club community, and the boundaries are illustrated in Figure 1-4. Alternatives that extend eastward of the existing edge of El Camino Real north of San Dieguito Road would be within the boundaries of this Specific Plan.

The Land Use and Community Planning Element of the 2008 General Plan includes a discussion of Proposition A lands that is relevant to the proposed project. Existing El Camino Real north of San Dieguito Road forms an eastern boundary of Proposition A Planning Area 30 (North City Subarea 2). Proposition A, the Managed Growth Initiative, was approved by the City of San Diego electorate in 1985. The initiative amended the Progress Guide and 1979 General Plan to require approval of a majority vote of the people for land to be shifted from the Future Urbanizing designation to Planned Urbanizing Area. By 2005, lands determined to be appropriate for more urban levels of development had shifted in accordance with Proposition A and the 1979 General Plan, and plans for certain areas, for example San Pasqual Valley, had been updated. The 2008 General Plan further notes that "federal, state, county, and other jurisdictions have participated with the City in planning for open space and habitat preservation in the San Dieguito and Tijuana River Valley." Policy LU-J.1 of the current Land Use and Community Planning Element calls for non-phase-shifted lands to be identified as Proposition A lands and no longer be referred to as Future Urbanizing Area. Proposition A lands within Planning Area 30 affected by the proposed project include widened El Camino Real west of the existing roadway and the proposed mitigation site.

A number of other planning documents set goals and objectives that apply to the project area. Besides the North City Future Urbanizing Area Framework Plan, these documents include the Fairbanks Country Club Specific Plan (City of San Diego 1982), San Dieguito River Regional Plan (City of San Diego 1984), San Dieguito River Park Concept Plan (San Dieguito River Park JPA 2002), Park Master Plan for the Coastal Area of the San Dieguito River Valley Regional Open Space Park (San Dieguito River Park JPA 2000), 2008 Master Plan for the Del Mar Fairgrounds and Horsepark (LSA Associates 2011), and the North City Local Coastal Program Land Use Plan (City of San Diego 1981, revised 1988). Consistency of the project with applicable planning documents is discussed in Section 3.1.2.2.

The MSCP is a conservation program designed to facilitate the implementation of a regional habitat preserve by coordinating project impacts and mitigation while allowing the issuance of

"take" permits for sensitive upland species at the local level (City of San Diego 1997). This habitat preserve is known as the MHPA, and lands within it have been designated for conservation. Various jurisdictions, including the City of San Diego, have developed MSCP Subarea plans to establish guidelines for the implementation of their respective preserve areas which are included in the regional MHPA. The proposed project alignment is situated partially within the Northern Area of the MHPA established by the City's subarea plan. A portion the project area situated west of El Camino Real and a portion situated south of El Camino Real and south of San Dieguito Road occur within the MHPA. Consistency of the project with the MSCP and MHPA adjacency guidelines is discussed in Section 3.1.3.9.

As shown in Figure 3.1-5, the Coastal Overlay Zone extends westward from the eastern edge of the right of way for Old El Camino Real and includes the San Dieguito River corridor west of El Camino Real. The San Dieguito River corridor west of El Camino Real is within Coastal Commission Appeal Jurisdiction. North and south of the river corridor, the Coastal Zone is in City Non-Apealable Area 1 (high coastal resource sensitivity). Approximately 2,400 feet west of El Camino Real, the Coastal Zone is in CCC Permit Jurisdiction. For all of the build alternatives (except the Eastern Alignment Alternative and Roundabout Alternative, which are generally that are east of the Coastal Zone), the road and bridge footprint would fall within areas requiring the City'sa CDP._ jurisdiction, with the bridge being in the corridor appealable to the CCC. For all build alternatives, the wetlands mitigation proposed to be implemented on the JPA Mitigation Site adjacent to and west of El Camino Real and south of the river would also require fall mostly within the City to's coordinate with the CCC for a CDP, CDP jurisdiction, but would extend westward into CCC permit jurisdiction. as discussed in Section 1.3.3.2. Therefore, the project would require a CDP from the City of San Diego, with the entire permit appealable to the CCC. In addition, a CDP would need to be processed with the CCC for any portion of the mitigation plan that would fall within the CCC permit jurisdiction.

As discussed in Section 1.3.3.2, in areas of deferred certification, coastal development permit jurisdiction rests with the CCC, not the City. According to the CCC's comment letter on the 2006 Draft EIR, their partial approval of the NCFUA in 1993 specifically identified that coastal development permit authority would only transfer to the City upon certification of subarea plans. Portions of the project site within and west of existing El Camino Real are located in Subarea II of the NCFUA. Since no subarea plan has ever been certified for Subarea II, it is the CCC's position that the entire subarea remains in the CCC's coastal development permit jurisdiction, and that the legal standard of review for the coastal development permit is Chapter 3 of the Coastal Act.

3.1.2 Affected Environment

3.1.2.1 Existing Land Uses

Regional Land Uses. This portion of El Camino Real is in the northwestern part of the NCFUA, as shown in the Framework Plan (City of San Diego 1995). A portion of the Framework Plan Diagram was presented in Figure 1-2. City zoning and the Framework Plan land use designations are the governing land use documents for the project area. El Camino Real is designated as a four-lane Major Arterial with a LOS of B in the Framework Plan. The road is along the eastern edge of Subarea II: San Dieguito. Fairbanks Country Club is adjacent to this edge of the NCFUA. Subarea III: Gonzales Canyon/Lower McGonigle Canyon (now Pacific Highlands Ranch) is south of San Dieguito Road and east of El Camino Real. The area of Subarea II that is west and east of El Camino Real and just south of Via de la Valle is designated Very Low Density Residential reflecting what may be constructed if the land is phase shifted. At this time the land can only be built per the underlying zone, which is AR-1-1 and OF-1-1 for most of the

area. The area west of El Camino Real along most of the road is designated Environmental Tier. This designation applies westward to I-5 and southward beyond San Dieguito Road.

The Fairbanks Country Club Specific Plan (City of San Diego 1982) indicates residential uses well east of El Camino Real. Approximately 80 percent of the area, most of which is in the floodplain of the San Dieguito River, was designated as open space in the Specific Plan. The plan notes that as open space, "the floodplain could be used for one or more of the following uses: preservation of natural resources, agriculture, outdoor recreation and scenic enjoyment. Outdoor recreation includes a range of uses from passive uses (riding/hiking trails or picnicking) or active uses including but not limited to a golf course."

Major Transportation Routes. Major transportation routes in the area include I-5, with interchanges at Del Mar Heights Road to the south, and Via de la Valle. Del Mar Heights Road extends westward to access the City of Del Mar, and eastward to access developments in Carmel Valley within the City of San Diego. San Dieguito Road extends eastward from El Camino Real to access Fairbanks Ranch Country Club in the City of San Diego and then turns northeastward to access Fairbanks Ranch in the County's jurisdiction. Via de la Valle turns northeastward to access Morgan Run Resort and Club, and Rancho Santa Fe in the County's jurisdiction. El Camino Real turns north from Via de la Valle approximately 1,100 feet east of the segment studied in this recirculated EIR, and runs along the west edge of Rancho Santa Fe within the jurisdiction of the County of San Diego. This part of El Camino Real is referred to as El Camino Real North in this recirculated EIR.

Project Site Land Uses. The Potential Impact Footprint (PIF) that encompasses all build alternatives is delineated in Figure 3.1-1. Parcels anticipated to be directly affected by the proposed project, based on current, conceptual project information, are numbered from PIF #1 through PIF #17. Corresponding parcel numbers and other parcel information are presented in Table 3.1-1. Zoning information is based on Grid Tile 39 of the City of San Diego Official Zoning map (dated October 26, 2010) and City of San Diego Municipal Code Chapter 13, Zones. The Assessor's Parcel Numbers (APNs) of other properties in the project vicinity are also provided on Figure 3.1-1, but only those properties potentially directly affected have been assigned a PIF number. Existing (2012) uses on the properties adjacent to the west side of El Camino Real, from north to south are as follows:

- Mary's Tack and Feed store (private ownership)
- Del Mar Horsepark (owned by the State of California 22nd District Agricultural Association)
- Coast to Crest Trail Horse Park segment, which currently dead ends at El Camino Real
- San Dieguito River (partly in State ownership, partly JPA ownership)
- Previously farmed agricultural fields (currently owned by the JPA and planned for open space/habitat restoration)

Existing uses on the properties adjacent to the east side of El Camino Real, from north to south are as follows:

- Private property (not developed with structures or infrastructure as of 2014)
- Polo Club fields (owned by City of San Diego)
- Open Space Preserve (owned by City of San Diego; developed for Fairbanks Ranch Country Club golf course expansion as of December 2003)
- San Dieguito Road
- Residential/agricultural property (private ownership) south of San Dieguito Road

Properties along the north side of Via de la Valle include commercial and residential uses that are in the jurisdiction of the County of San Diego.

PIF #	APN	Owner/Current Use	Address/Location	Zone
1	302-090-11	State of California 22 nd District Agricultural Association/ Del Mar Horsepark	14550 El Camino Real/west of El Camino Real, north of San Dieguito River	OF-1-1/ AR-1-1
2	302-090-32	Polo View LLC/vacant	East of El Camino Real and south of Via de la Valle	AR-1-1
3	302-210-60	M.L. Mosley/Mary's Tack & Feed	3675 Via de la Valle/ southwest corner of El Camino Real and Via de la Valle	AR-1-1
4	302-210-29	Polo View LLC/ Commercial	Northwest corner of El Camino Real and Via de la Valle	C30/S86 (County of San Diego)
5	302-210-30	Polo View LLC/ Commercial	Northwest corner of El Camino Real and Via de la Valle	C30 (County of San Diego)
6	302-210-62	Polo Plaza LLC/ Commercial	Northeast corner of El Camino Real and Via de la Valle	C30/S86 (County of San Diego)
	302-210-62	Polo Plaza LLC/ Commercial	Northeast corner of El Camino Real and Via de la Valle	C30/S86 (County of San Diego)
	302-210-62	Polo Plaza LLC/ Commercial	Northeast corner of El Camino Real and Via de la Valle	C30/S86 (County of San Diego)
7	302-090-27	Casa Palmera LLC/ elderly care facility	Northeast corner of El Camino Real North and Via de la Valle	RS-1-11
8	302-090-28	Villa Paraiso LP /Commercial	Northwest corner of El Camino Real North and Via de la Valle	CO-1-1/ OC-1-1
9	302-090-31	Polo View LLC/ vacant	East of El Camino Real and south of Via de la Valle	AR-1-1
10	302-261-01	City of San Diego/ Polo Club Fields	East of El Camino Real and north of San Dieguito River	AR-1-1/AR-1-2/ OF-1-1
11	302-261-02	City of San Diego/ Fairbanks Ranch Country Club Golf Course (expansion)	East of El Camino Real and south of San Dieguito River	AR-1-1/ AR-1-2/ OF-1-1
12	302-261-03	San Diego Music Conservatory Property LLC/ residential	14333 San Dieguito Road/east of Old El Camino Real and south of San Dieguito Road	AR-1-2
13	304-020-25	Living Water Lutheran Church/ undeveloped	East of El Camino Real, west of Old El Camino Real, and mostly south of San Dieguito Road; includes triangular area north of San Dieguito Road and another east of old El Camino Real	AR-1-1
14	304-020-16	San Dieguito River Park JPA/agricultural fields (planned for open space/habitat restoration)	West of El Camino Real and south of San Dieguito River	AR-1-1/ OF-1-1
OF = Oper	n Space – Flood	plain (City)	OC = Open Space-Conservation (City)

Table 3.1-1 Property Information

C30 = General Commercial Use (County of San Diego) AR = Agricultural Residential (City)

OC = Open Space-Conservation (City)

CO -= Commercial-Office (City) RS = Residential-Single Unit (City)

Note: The above properties may be directly affected by the proposed project, depending on the alternative selected, based on current conceptual project information. However, other properties in the vicinity may eventually need to be included in right-of-way negotiations upon completion of the environmental process and execution of final design. APNs of these and neighboring properties are listed as available from existing data bases, and are indicated on Figure 3.1-1.

3.1.2.2 Planned Land Uses per Planning Documents

The General Plan approved in 2008 includes the following elements:

- Land Use and Community Planning
- Mobility
- Urban Design
- Economic Prosperity
- Public Facilities, Services and Safety
- Recreation
- Conservation
- Historic Preservation
- Noise
- Housing

No policies relevant to the proposed project were identified in the Economic Prosperity, Historic Preservation, and Housing elements. All alternatives would be generally consistent with the policies of the relevant elements, with the exception of the Road Capacity, Bicycle Safety, and No Build alternatives for policies in the Mobility Element, Urban Design Element, and Recreation Element due to failure to provide capacity improvement and pedestrian or bicycle facilities.

The 2006 analysis of consistency with the previous City General Plan has been deleted from this recirculated EIR. The following is the detailed analysis of the 2008 General Plan and other policy documents that were analyzed in the 2006 Draft EIR (updated to include the Roundabout Alternative and the Eastern Alignment Alternative as demolishing the existing bridge at the end of construction of the new bridge).

The goals, guidelines and standards, and recommendations in relevant governing planning documents and project consistency with them are summarized in the following tables:

- Table 3.1-2: Project Consistency with 2008 City of San Diego General Plan
- Table 3.1-3: Project Consistency with City of San Diego Strategic Framework Element
- Table 3.1-4: Project Consistency with North City Future Urbanizing Area Framework Plan
- Table 3.1-5: Project Consistency with the San Dieguito River Regional Plan
- Table 3.1-6: Project Consistency with City of San Diego North City Local Coastal Program

The Fairbanks Ranch Country Club Specific Plan notes that Via de la Valle, El Camino Real, and San Dieguito Road are all planned to be improved to major road standards. The proposed El Camino Real Bridge/Road Widening Project is consistent with the circulation facilities and the City's long-range transportation plans discussed in the Specific Plan.

Project considerations that are relevant for the environmental impact analysis and conclusions regarding consistency are also in the tables.

Planning	Key Goals, Guidelines and	Project Considerations	Consistency
Document	Standards		
GENERAL PLAN			
Economic Prosperity Element	No policies applicable to the proposed project	N/A	N/A
Historic Preservation Element	No policies applicable to the proposed project	N/A	N/A
Housing Element	No policies applicable to the proposed project	N/A	N/A
Land Use and Community Planning	LU-B.2: Identify a more refined street system than is included in the General Plan Land Use and Streets Map through the community plan update and amendment process (see also Mobility Element, Section C).	The existing alignment of El Camino Real is depicted on Figure LU-2: General Plan Land Use and Street System. All alternatives except the Eastern Alignment and Roundabout alternatives would widen along the existing alignment; those two alternatives would shift the alignment of El Camino Real to the east to line up with De la Valle Place. The proposed alignment for all alternatives generally matches current line between Via de la Valle and San Dieguito Road.	Consistent: -All alternatives
Land Use and Community Planning	Land uses in Figure LU-2 for the area crossed by the proposed alignment is designated as Park, Open Space, and Recreation for the golf course and Polo Club fields, and Residential for the currently undeveloped property along Via de la Valle.	Open Space is defined in Table LU-4 of the General Plan as providing for the "preservation of land that has distinctive scenic, natural or cultural features; that contributes to community character and form; or that contains environmentally sensitive resources. Applies to land or water areas that are undeveloped, generally free from development, or developed with very low-intensity uses that respect natural environmental characteristics and are compatible with the open space use. Open Space may have utility for: primarily passive park and recreation use; conservation of land, water, or other natural resources; historic or scenic purposes; visual relief; or landform preservation." Alternatives that would widen the existing roadway and bridge would be in the same corridor as the existing linear infrastructure, which is planned to be widened in the General Plan. Construction of a new roadway and bridge on the property of the golf course would not impact the active golf course area. Construction of a new roadway and bridge on the property of the Polo Club fields would be allowable because in the lease for the Polo Club fields recreational use, the City reserved the right to grant and use easements or establish and use rights-of- way over, under, along and across the leased premises for utilities, thoroughfares, or access as it deems advisable for the	Consistent: -All alternatives

 Table 3.1-2

 Project Consistency with City of San Diego General Plan

or access as it deems advisable for the

Planning	Key Goals, Guidelines and	Project Considerations	Consistency
Document	Standards		
GENERAL PLAN			
		public good, as discussed in Section 3.1.3.7 of this recirculated EIR. The designation of Parks in Table LU-4 allows for facilities and services to meet the recreational needs of the community as defined by the community plan. Access improvement, congestion relief, and intersection improvements are part of public facilities and services that help meet recreational needs. The project would be compatible with the designation of Residential because it does not propose any housing or change density.	
Land Use and Community Planning	LU-H.6: Provide linkages among employment sites, housing, and villages via an integrated transit system and a well-defined pedestrian and bicycle network.	The Road Capacity and Bicycle Safety alternatives would not provide pedestrian walkways. The Road Capacity Alternative would not provide bike lanes. All of the other build alternatives would provide elements to accommodate pedestrians and bicyclists. The No Build Alternative would not change existing conditions.	Consistent: -All alternatives except Road Capacity, Bicycle Safety, and No Build
Mobility Element	ME-A.1. Design and operate sidewalks, streets, and intersections to emphasize pedestrian safety and comfort through a variety of street design and traffic management solutions,	The Road Capacity and Bicycle Safety alternatives would not provide pedestrian walkways. All of the other build alternatives would provide elements to accommodate pedestrians. All of the build alternatives except the Roundabout Alternative would include a pedestrian/equestrian activated signal crossing at the Horsepark/Polo Club driveways. The No Build Alternative would not change existing conditions. The Roundabout Alternative would not have signalized intersections but would have crosswalks farther from the intersection.	Consistent: -All alternatives except Road Capacity, Bicycle Safety, and No Build
Mobility Element	ME-A.2. Design and implement safe pedestrian routes.	The Road Capacity and Bicycle Safety alternatives would not provide pedestrian walkways.	Consistent: -All alternatives except Road Capacity, Bicycle Safety, and No Build
Mobility Element	ME-A.4. Make sidewalks and street crossings accessible to pedestrians of all abilities.	The Road Capacity and Bicycle Safety alternatives would not provide pedestrian walkways. The Roundabout Alternative would not have signalized intersections, but would have crosswalks farther from the intersection.	Consistent: -All alternatives except Road Capacity, Bicycle Safety, and No Build

Planning Document	Key Goals, Guidelines and Standards	Project Considerations	Consistency
GENERAL PLAN			
Mobility Element	ME-A.5. Provide adequate sidewalk widths and clear path of travel as determined by street classification, adjoining land uses, and expected pedestrian usage.	The Road Capacity and Bicycle Safety alternatives would not provide pedestrian walkways.	Consistent: All alternatives except Road Capacity, Bicycle Safety, and No Build
Mobility Element	ME-A.6. Work toward achieving a complete, functional and interconnected pedestrian network.	The Road Capacity and Bicycle Safety alternatives would not provide pedestrian walkways.	Consistent: -All alternatives except Road Capacity, Bicycle Safety, and No Build
Mobility Element	ME-C.1. Identify the general location and extent of streets, sidewalks, trails, and other transportation facilities and services needed to enhance mobility in community plans.	All alternatives except the Bicycle Safety Alternative would provide 4 travel lanes as designated for El Camino Real in relevant plans and policies. All alternatives except the Road Capacity Alternative would have left-turn pockets for recreational access at Horsepark and Polo Club fields, and to facilitate access for large trucks at Mary's Tack and Feed. All of the build alternatives except the Roundabout Alternative would include a pedestrian/equestrian activated signal crossing at the Horsepark/Polo Club driveways. All of the build alternatives would provide for the ability of other entities to construct a cantilever trail extending from the western side of the new bridge. The Road Capacity and Bicycle Safety alternatives would not provide pedestrian walkways. The Road Capacity Alternative would not provide bike lanes. The Roundabout Alternative would not have signalized intersections, but would have crosswalks farther from the intersection. The No Build Alternative would not change existing conditions.	Consistent: -All alternatives except Road Capacity, Bicycle Safety, and No Build
Mobility Element	ME-C.2. Provide adequate capacity and reduce congestion for all modes of transportation on the street and freeway system.	All alternatives except the Bicycle Safety alternative would provide 4 travel lanes. Traffic analysis indicates the Road Capacity and Bicycle Safety alternatives would have LOS F in the future condition. The Roundabout Alternative would have LOS E and F at El Camino Real and Via de la Valle unless the ultimate design were constructed. Only the Eastern Alignment Alternative would provide full intersection improvements at this location. The No Build Alternative would not change existing conditions and would have LOS F in near-term and future condition.	Consistent: -All alternatives except Road Capacity, Bicycle Safety, and No Build

Planning Document	Key Goals, Guidelines and Standards	Project Considerations	Consistency
GENERAL PLAN			
Mobility Element	ME-C.3. Design an interconnected street network within and between communities, which includes pedestrian and bicycle access, while minimizing landform and community character impacts.	Proposed alignment generally matches current line between Via de la Valle and San Dieguito Road. The Road Capacity Alternative would have a narrow median. Median would be hardscape for all other alternatives. All of the build alternatives would provide for the ability of other entities to construct a cantilever trail extending from the western side of the new bridge. The Road Capacity and Bicycle Safety alternatives would not provide pedestrian walkways or parkways. The Road Capacity Alternative would not provide bike lanes. The surrounding area is flat. Road embankment slope for all alternatives except the Road Capacity and Bicycle Safety alternatives would be 2:1. The Road Capacity and Bicycle Safety alternatives would have retaining walls. Visual enhancements to reduce visual impacts would include parkway landscaping with street trees such as coast live oak and shrubs such as coyote bush, slope landscaping with native shrubs, toyon, and hydroseed mix (see Section 2.2.10), except for the Road Capacity and Bicycle Safety alternatives. All build alternatives except the Lower Elevation Alternative would provide a multi-use trail under crossing under the north end of the bridge to enhance trail connectivity.	Consistent: -All alternatives except Road Capacity, Bicycle Safety, and No Build
Mobility Element	ME-C.4. Improve operations and maintenance on City streets and sidewalks	All build alternatives except the Bicycle Safety Alternative and the No Build Alternative would provide 4 travel lanes. Traffic analysis indicates the Road Capacity and Bicycle Safety alternatives would have LOS F in the future condition. The Roundabout Alternative would not have signalized intersections. Signals at intersections for all alternatives except the Roundabout alternative would be optimized. The Road Capacity and Bicycle Safety alternatives would not provide pedestrian walkways.	Consistent: All alternatives except Road Capacity, Bicycle Safety, and No Build
Mobility Element	ME-C.5. Install traffic calming measures as appropriate	Roundabout Alternative has been added to the recirculated EIR and addressed at an equal level of detail.	Consistent: All build alternatives

Planning Document	Key Goals, Guidelines and Standards	Project Considerations	Consistency
GENERAL PLAN			
Mobility Element	ME-C.6. Locate and design new streets and freeways and, to the extent practicable, improve existing facilities to: respect the natural environment, scenic character, and community character of the area traversed; and to meet safety standards.	All build alternatives involve raising the bridge and road above the 100-year flood level. All alternatives except the Road Capacity and Bicycle Safety alternatives would raise El Camino Real on landscaped embankment slopes. The Road Capacity and Bicycle Safety alternatives would raise the road on retaining walls and would not have parkways in order to minimize the road width. Visual enhancements for build alternatives except the Road Capacity and Bicycle Safety alternatives would include parkway landscaping with street trees such as coast live oak and shrubs such as coyote bush, slope landscaping with native shrubs, toyon, and hydroseed mix (see Section 2.2.10).	Consistent: -All alternatives except Road Capacity, Bicycle Safety, and No Build
Mobility Element	ME-C.7. Preserve and protect scenic vistas along public roadways.	All build alternatives involve a bridge and roadway that would be above the 100-year flood level. Views to the east from Horsepark are already blocked by existing topography. Views to the west from Polo Club fields would be blocked by the raised roadway, but these are not public views because this recreational area is operated privately through a lease with the City. Public views of the river would not be blocked for recreational trail users on the trail east of El Camino Real on the north bank of the river. There would be fewer piers in the river and the bridge would be higher for all build alternatives. Views to the west for travelers on the bridge would be impaired by the chain link fencing for the cantilever equestrian trail for all build alternatives.	Consistent: -None of the build alternatives if cantilever with proposed fencing is installed. -All alternatives if the cantilever with proposed fencing is not installed
Mobility Element	ME-C.9. Implement best practices for multi-modal quality/level of service analysis guidelines to evaluate potential transportation improvements from a multi-modal perspective in order to determine optimal improvements that balance the needs of all users of the right of way.	All of the build alternatives would provide for the ability of other entities to construct a cantilever trail extending from the western side of the new bridge. The Road Capacity and Bicycle Safety alternatives would not provide pedestrian walkways. The Road Capacity Alternative would not provide bike lanes. The No Build Alternative would not change existing conditions.	Consistent: All alternatives except Road Capacity, Bicycle Safety, and No Build alternatives
Mobility Element	ME-D.1. Utilize the substantial regional Intelligent Transportation Systems (ITS) investments to achieve cost- effective improvements in transportation system	Optimization will be incorporated into the signal design for all alternatives except the Roundabout Alternative, which will operate without signalization.	Consistent: All alternatives except No Build alternative

Planning Document	Key Goals, Guidelines and Standards	Project Considerations	Consistency
GENERAL PLAN			
	performance and operations wherever possible.		
Mobility Element	ME-E.3. Emphasize the movement of people rather than vehicles.	All of the build alternatives would provide for the ability of other entities to construct a cantilever trail extending from the western side of the new bridge. The Road Capacity and Bicycle Safety alternatives would not provide pedestrian walkways. The Road Capacity Alternative would not provide bike lanes. The No Build Alternative would not change existing conditions.	Consistent: -All alternatives except Road Capacity, Bicycle Safety, and No Build alternatives
Mobility Element	ME-F.1. Implement the Bicycle Master Plan, which identifies existing and future needs, and provides specific recommendations for facilities and programs over the next 20 years.	El Camino Real and Via de la Valle are shown as bikeways on Figure ME-2. Only the Road Capacity Alternative would not provide bike lanes on El Camino Real. All build alternatives would provide bike lanes on Via de la Valle.	Consistent: All alternatives except Road Capacity and No Build alternatives.
Mobility Element	ME-F.3. Maintain and improve the quality, operation, and integrity of the bikeway network and roadways regularly used by bicyclists.	The Road Capacity Alternative would not provide bike lanes.	Consistent: -All alternatives except Road Capacity and No Build alternatives
Urban Design Element	UD-A.1. Preserve and protect natural landforms and features.	All build alternatives involve raising the road along the Fairbanks Ranch Golf Course south of the bridge and east of El Camino Real. The surrounding area is flat. All alternatives except the Road Capacity and Bicycle Safety alternatives would raise El Camino Real on landscaped embankment slopes. The Road Capacity and Bicycle Safety alternatives would raise the road on retaining walls in order to minimize the road width. Directly under the bridge, the embankment slopes would be steepened to 1.5:1 from approximately 2:1, and would be protected from erosion with riprap, as open stabilization could not be successfully planted due to the steep slopes and shading directly under the bridge. All build alternatives would be consistent with the Multiple Species Conservation Program (MSCP).	Consistent: -All alternatives except Road Capacity and Bicycle Safety alternatives
Urban Design Element	UD-A.3. Design development adjacent to natural features in a sensitive manner to highlight and complement the natural environment in areas designated for development.	The Road Capacity and Bicycle Safety alternatives would not provide pedestrian walkways. The Road Capacity Alternative would not provide bike lanes. All of the build alternatives would provide for the ability of other entities to construct a cantilever trail extending from the western	Consistent: -All alternatives except Road Capacity, Bicycle Safety, and No Build if the cantilever is not

Planning Document	Key Goals, Guidelines and Standards	Project Considerations	Consistency
GENERAL PLAN			
	 Protect views from public roadways and parklands to natural canyons, resource areas, and scenic vistas. Provide public pedestrian, bicycle, and equestrian access paths to scenic view points, parklands, and where consistent with resource protection in natural resource open space areas. Provide special consideration to the sensitive environmental design of roadways that traverse natural open space systems to ensure an integrated aesthetic design that respects open space resources. This could include the use of alternative materials such as "quiet pavement" in noise sensitive locations, and bridge or roadway designs that respect the natural environment. 	side of the new bridge. The cantilever would enhance connectivity, but views to the west for travelers on the bridge would be impaired by the chain link fencing for the cantilever equestrian trail, for all build alternatives. Visual enhancements for build alternatives except Road Capacity and Bicycle Safety would include parkway landscaping with street trees such as coast live oak and shrubs such as coyote bush, slope landscaping with native shrubs, toyon, and hydroseed mix (see Section 2.2.10).	installed, -None of the build alternatives if cantilever with proposed fencing is installed.
Urban Design Element	UD-A.8. Landscape materials and design should enhance structures, create and define public and private spaces, and provide shade, aesthetic appeal, and environmental benefits.	Visual enhancements for build alternatives except Road Capacity and Bicycle Safety alternatives would include parkway landscaping with street trees such as coast live oak and shrubs such as coyote bush, slope landscaping with native shrubs, toyon, and hydroseed mix (see Section 2.2.10).	Consistent: -All alternatives except Road Capacity, Bicycle Safety, and No Build alternatives
Urban Design Element	UD-A.10. Design or retrofit streets to improve walkability, bicycling, and transit integration; to strengthen connectivity; and to enhance community identity.	The Road Capacity and Bicycle Safety alternatives would not provide pedestrian walkways. The Road Capacity Alternative would not provide bike lanes. The No Build Alternative would not change existing conditions	Consistent: -All alternatives except Road Capacity, Bicycle Safety, and No Build alternatives
Public Facilities, Services and Safety Element – Storm Water Infrastructure	PF-G.2: Install infrastructure that includes components to capture, minimize, and/or prevent pollutants in urban runoff from reaching receiving waters and potable water supplies.	Final design plans and specifications for the selected alternative will include best management practices during construction. The drainage system will be designed to avoid erosion and sedimentation during and after construction. The No Build Alternative would not involve any construction, and drainages would continue to function as they do now.	Consistent: -All alternatives

Planning Document	Key Goals, Guidelines and Standards	Project Considerations	Consistency
GENERAL PLAN			
Recreation Element	 RE-F.2. Provide for sensitive development of recreation uses within and adjacent to City-owned open space lands. a. Include only those development features and amenities that do not encroach upon or harm the feature or resource that inspires the open space or resource-based park. b. Design and maintain open space lands to preserve or enhance topographic and other natural site characteristics. c. Preserve designated public open space view corridors, such as views to the Pacific Ocean, other bodies of water, and significant topographic features. 	The Road Capacity and Bicycle Safety alternatives would not provide pedestrian walkways. The Road Capacity Alternative would not provide bike lanes. All of the build alternatives would provide for the ability of other entities to construct a cantilever trail extending from the western side of the new bridge. The cantilever would enhance connectivity, but views to the west for travelers on the bridge would be impaired by the chain link fencing for the cantilever equestrian trail, for all build alternatives. The No Build Alternative would not change existing conditions.	Consistent: -All alternatives except Road Capacity, Bicycle Safety, and No Build alternatives if the cantilever is not installed, -None of the build alternatives if cantilever with proposed fencing is installed.
Recreation Element	RE-F.7: Create or enhance open space multi-use trails to accommodate, where appropriate, pedestrians/hikers, bicyclists, and equestrians.	The Road Capacity and Bicycle Safety alternatives would not provide pedestrian walkways. The Road Capacity Alternative would not provide bike lanes. All of the build alternatives would provide for the ability of other entities to construct a cantilever trail extending from the western side of the new bridge. The No Build Alternative would not change existing conditions.	Consistent: -All alternatives except Road Capacity, Bicycle Safety, and No Build alternatives
Conservation Element	CE-B.1: Protect and conserve the landforms, canyon lands, and open spaces that define the City's urban form; provide public views/vistas; serve as core biological areas and wildlife linkages; are wetlands habitats; provide buffers within and between communities; or provide outdoor recreational opportunities.	All build alternatives involve raising the road along the Fairbanks Ranch Golf Course south of the bridge and east of El Camino Real. The surrounding area is flat. All alternatives except the Road Capacity and Bicycle Safety alternatives would raise El Camino Real on landscaped embankment slopes. The Road Capacity and Bicycle Safety alternatives would raise the road on retaining walls in order to minimize the road width. Directly under the bridge, the embankment slopes would be steepened to 1.5:1 from approximately 2:1, and would be protected from erosion with riprap, as open stabilization could not be successfully planted due to the steep slopes and shading directly under the bridge. All build alternatives would be consistent with the MSCP. All build alternatives would include wetlands	Consistent: -All alternatives

Planning Document	Key Goals, Guidelines and Standards	Project Considerations	Consistency
GENERAL PLAN			
-		mitigation on the fallow fields owned by the JPA. All build alternatives would prevent direct impacts to sensitive wildlife by avoiding construction in the river area during the breeding season for clapper rail and least Bell's vireo.	
Conservation Element	CE-B.4: Limit and control runoff, sedimentation, and erosion both during and after construction activity.	Final design plans and specifications for the selected alternative will include best management practices during construction. The drainage system will be designed to avoid erosion and sedimentation during and after construction. The No Build Alternative would not involve any construction, and drainages would continue to function as they do now.	Consistent: -All alternatives
Conservation Element	CE-B.5: Maximize the incorporation of trails and greenways linking local and regional open space and recreation areas into the planning and development review processes.	All of the build alternatives would provide for the ability of other entities to construct a cantilever trail extending from the western side of the new bridge. All build alternatives except the Lower Elevation Alternative would provide a multi-use trail under crossing under the north end of the bridge to enhance trail connectivity. The No Build Alternative would not change existing conditions.	Consistent: -All alternatives except the No Build alternative
Conservation Element	CE-C.8. Protect coastal vistas and overlook areas from obstructions and visual clutter where it would negatively affect the public's reasonable use and enjoyment of the resource.	All of the build alternatives would provide for the ability of other entities to construct a cantilever trail extending from the western side of the new bridge. The cantilever would enhance connectivity, but views to the west for travelers on the bridge would be impaired by the chain link fencing for the cantilever equestrian trail, for all build alternatives.	Consistent: -All alternatives if the cantilever is not installed, -None of the build alternatives if cantilever with proposed fencing is installed.
Conservation Element	CE-E.7: Manage floodplains to address their multi-purpose use, including natural drainage, habitat preservation, and open space and passive recreation, while also protecting public health and safety.	All build alternatives avoid increases in 100-year water surface elevations upstream. All build alternatives involve raising the bridge and road above the 100- year flood level to enhance public health and safety. All build alternatives would be consistent with the MSCP. All build alternatives would include wetlands mitigation on the fallow fields owned by the JPA, helping to accomplish regional habitat restoration plans.	Consistent: -All alternatives except the No Build alternative
Conservation Element	CE-G.5: Promote aquatic biodiversity and habitat recovery by reducing hydrological alterations, such as grading a stream channel.	All build alternatives would be consistent with the MSCP. All build alternatives would include wetlands mitigation on the fallow fields owned by the JPA, helping to accomplish regional habitat restoration plans. Directly under the new bridge of each build alternative, the embankment	Consistent -All alternatives

Planning Document	Key Goals, Guidelines and Standards	Project Considerations	Consistency
GENERAL PLAN			
		slopes would be steepened to 1.5:1 from approximately 2:1, and would be protected from erosion with riprap. This limited grading of river slopes would minimize other hydrological alterations that would otherwise be needed to prevent increased 100-year water surface elevations upstream.	
Conservation Element	CE-H.8: Implement a "no net loss" approach to wetlands conservation in accordance with all city, state, and federal regulations.	All build alternatives would be consistent with the MSCP. All build alternatives would include wetlands mitigation on the fallow fields owned by the JPA, with mitigation ratios proposed to achieve no net loss of wetlands. The proposed mitigation concept plan will be finalized in consultation with permitting agencies including the U. S. Army Corps of Engineers, USFWS, and CDFW. The Roundabout Alternative would require additional acreage of wetland mitigation beyond the JPA Mitigation Site. Additional suitable mitigation opportunities exist within the project vicinity; therefore, additional off-site mitigation would be achievable for the Roundabout Alternative on a site owned by the City.	Consistent -All alternatives
Noise Element	NE-B.2. Consider traffic calming design, traffic control measures, and low-noise pavement surfaces that minimize motor vehicle traffic noise.	The Roundabout Alternative has been added to the recirculated EIR and addressed at an equal level of detail.	Consistent -All alternatives

Planning Document	Key Goals, Guidelines and Standards	Project Considerations	Consistency
STRATEGIC FRAMEWORK ELEMENT			
Urban Form and Environment	Provide alternative modes of mobility.	All of the build alternatives except the Road Capacity and Bicycle Safety alternatives would provide pedestrian walkways and bike lanes along the length of El Camino Real from Via de la Valle to San Dieguito Road. The Road Capacity Alternative would not have bike lanes or pedestrian walkways. The Bicycle Safety Alternative would have bike lanes but no pedestrian walkways.	Consistent: -All alternatives except Road Capacity, Bicycle Safety and No Build alternatives
Neighborhood Quality	Promote streetscape, bicycle facilities, urban trails, paths and pedestrian connection projects.	All of the build alternatives except the Road Capacity and Bicycle Safety alternatives would provide pedestrian walkways and bike lanes along the length of El Camino Real from Via de la Valle to San Dieguito Road. The Road Capacity Alternative would not have bike lanes or pedestrian walkways. The Bicycle Safety Alternative would have bike lanes but no pedestrian walkways.	Consistent: -All alternatives except Road Capacity, Bicycle Safety and No Build alternatives
Neighborhood Quality	Promote an interconnected street network, which includes pedestrian and bicycle access, where topography and landform permits.	All of the build alternatives except the Road Capacity and Bicycle Safety alternatives would provide pedestrian walkways and bike lanes along the length of El Camino Real from Via de la Valle to San Dieguito Road. The Road Capacity Alternative would not have bike lanes or pedestrian walkways. The Bicycle Safety Alternative would have bike lanes but no pedestrian walkways.	Consistent: -All alternatives except Road Capacity, Bicycle Safety and No Build alternatives
Neighborhood Quality	Promote pedestrian, bicycle and transit friendly design of City streets.	All of the build alternatives except the Road Capacity and Bicycle Safety alternatives would provide pedestrian walkways and bike lanes along the length of El Camino Real from Via de la Valle to San Dieguito Road. The Road Capacity Alternative would not have bike lanes or pedestrian walkways. The Bicycle Safety Alternative would have bike lanes but no pedestrian walkways.	Consistent: -All alternatives except Road Capacity, Bicycle Safety and No Build alternatives
Neighborhood Quality	Provide capacity and operational improvements to streets and highways to minimize congestion with a focus on persons and goods, not just vehicles.	All of the build alternatives except the Road Capacity and Bicycle Safety alternatives would provide pedestrian walkways and bike lanes with 4 travel lanes and special left-turn pocket/enhanced access at Mary's Tack and Feed for large trucks. The Road Capacity Alternative would not provide the left-turn pocket, and the Bicycle Safety Alternative would only provide two travel lanes.	Consistent: -All alternatives except Road Capacity, Bicycle Safety and No Build alternatives

 Table 3.1-3

 Project Consistency with City of San Diego Strategic Framework Element

Planning Document	Key Goals, Guidelines and Standards	Project Considerations	Consistency
NCFUA FRAMEWORK PLAN			
4.8g	4.8g: Create a wide landscaped roadway edge along arterial streets, using berms, dense planting and other devices that reduce the need for sound attenuation walls.	Full widened roadway cross section alternatives include 22-foot-wide urban parkways on both sides of the road, incorporating the landscaping concepts and native seed mix described in Section 2.2.10. The narrow cross section alternatives would not provide a landscaped edge.	Consistent: -All build alternatives except Roadway Capacity and Bicycle Safety alternatives
4.9c	4.9c: Where streets cross the open space system, bridge structures should be used to cross canyons.4.10a: Within the 100-year floodplain fringe of the San	All build alternatives would include a new vehicular bridge to cross the San Dieguito River. The No Build Alternative would retain the existing bridge for vehicular travel over the San Dieguito River. The proposed project involves a bridge	Consistent: -All alternatives Consistent:
	Dieguito River, fill for roads and other public improvements and/or permanent structures will be permitted only if such development is consistent with the policies detailed in the North City Local Coastal Program (LCP).	replacement necessary for public safety, and a road expansion essential to relief of congestion in the regional area. The bridge abutment design allows the road and bridge to be raised above the 100-year flood elevation without increasing 100-year water surface elevations upstream above levels predicted under existing (2012)	-All alternatives except No Build alternative
	Revisions to the North City LCP approved by the California Coastal Commission on January 13, 1988 note that "Channelization or other substantial alteration of rivers or streams shall be limited to (1) necessary water supply projects,	conditions. The requirements of Part B are included in the project.	
	 (2) flood control projects where no other feasible method for protecting existing public or private structures exists and where such protection is necessary for public safety or to protect existing development, or (3) other development, a 		
	primary element of which is the improvement of fish and wildlife habitat. Such development may include new or expanded roads or highways that are essential to the economic health of the region, state or nation, provided they comply with all the provisions		

 Table 3.1-4

 Project Consistency with North City Future Urbanizing Area Framework Plan

Planning Document	Key Goals, Guidelines and Standards	Project Considerations	Consistency
NCFUA FRAMEWORK PLAN			
	of part (B) of this policy and all other applicable policies of this local coastal program." Part (B) includes requirements for hydrological studies, no increase in peak runoff rate, minimization of stream scour, a floodway that accommodates the 100-year flood, and natural stream bottom and sides.		
4.10f	4.10f: Development should not obstruct public views.	All build alternatives involve a bridge and roadway that would be above the 100-year flood level. Views to the east from Horsepark are already blocked by existing topography. Views to the west from Polo Club fields would be blocked by the raised roadway, but these are not public views because this recreational area is operated privately through a lease with the City. Public views of the river would not be blocked for recreational trail users on the trail east of El Camino Real on the north bank of the river. There would be fewer piers in the river and the bridge would be higher for all build alternatives. Views to the west for travelers on the bridge would be impaired by the chain link fencing for the cantilever equestrian trail, for all build alternatives. The No Build Alternative would not change views.	Consistent: -None of the build alternatives
4.10n	4.10n: All exterior lighting shall be a low-sodium type with horizontal cut-off and shall be shielded downward such that the light would not be visible to the adjacent properties and the proposed [San Dieguito River Valley Regional Open Space] park.	This requirement will be incorporated into the design of the selected alternative. The No Build Alternative would not change existing lighting in the area.	Consistent: -All alternatives

Planning Document	Key Goals, Guidelines and Standards	Project Considerations	Consistency
NCFUA FRAMEWORK PLAN			
5.1c	5.1c: Preserve floodplains and significant topographic features such as canyons, ridges, and hillsides.	The project does not propose new development in the floodplain because the widened road and new bridge would be constructed in the same general corridor as the existing road and bridge. The existing floodplain would not be substantially changed upstream (east) of widened El Camino Real, even though the road would be raised on fill across the floodplain. To the extent that flow would not occur across El Camino Real due to the new road embankment, the Horsepark property would be protected from flooding from the east. However, this area would still be subject to flooding due to overflow of the San Dieguito River west of the road. The No Build Alternative would not affect the floodplain.	Consistent: -All alternatives
5.4f	5.4f: No concrete, asphalt, riprap, or other channelization structures will be allowed within the open space system's drainage areas or floodplains. Floodplain banks will be (re) revegetated with appropriate native species (riparian scrub or woodland, chaparral, or sage scrub), restoring drainage areas and floodplains to fully- functional ecosystems.	The river banks under the bridge would be excavated to have approximately 1.5:1 side slopes in order to avoid any increase in predicted 100-year water surface elevations that could be caused by the project. With the steeper abutment slopes under the new bridge, 100-year water surface elevations with the project would be the same as predicted for existing conditions. The abutment slopes under the bridge would have to be protected with riprap because these slopes would be too steep to successfully plant in open stabilization materials and plant growth would be inhibited by bridge shading. An open system of reinforcement underneath the bridge would not be able to successfully develop vegetative cover, so would be limited to the smallest area possible at the bridge. This area would be temporarily and permanently disturbed by construction activities. By preventing future erosion, the protective riprap is the least environmentally damaging slope protected from erosion by open stabilization materials planted with appropriate native species.	Consistent: -All alternatives

Planning Document	Key Goals, Guidelines and Standards	Project Considerations	Consistency
NCFUA FRAMEWORK PLAN			
		The weir in the berm for the mitigation area would be protected from erosion by open stabilization material planted with appropriate native species. All revegetation would meet applicable standards including City landscape regulations, MSCP, and	
5.4g	5.4g: No water entering the open space system through storm water runoff pipes and facilities shall enter at a speed causing erosion or other detrimental effects to the natural ecosystem. Drainage areas shall be thickly vegetated with native species to prevent erosion and to help filter water.	Biological Resources Guidelines. The Road Capacity, Bicycle Safety, and Western Alignment alternatives would avoid impacts to the existing drainage ditch. The Central Alignment and Lower Elevation alternatives would re-create the drainage ditch immediately to the east. The Eastern Alignment Alternative and Roundabout Alternative would minimize impacts to the existing drainage ditch but not avoid it completely. The No Build Alternative would not change existing drainage patterns and capacity.	Consistent: -All alternatives
5.5a	5.5a: Where it is essential that a road cross the environmental tier, bridge structures shall be required to provide unobstructed wildlife corridors. Structures should be designed and built to minimize the need for alteration of natural landforms.	All build alternatives include replacing the existing bridge with a structure that would have fewer piers in the river than the existing bridge. Therefore, upon completion of construction, the wildlife corridor in the river would be less obstructed than in existing conditions. For all alternatives, during construction, corridor impacts would be minimized by keeping the river free of equipment at night, and by not constructing during the bird breeding season. The No Build Alternative would not change existing conditions.	Consistent: -All alternatives
5.5d	5.5d: Where roads enter and traverse portions of the open space system, provisions shall be taken to provide for wildlife movement across the road a minimum of once every ½ mile.	All build alternatives include a wider and higher structure that would have fewer piers in the river than the existing bridge. The No Build Alternative would not change existing conditions.	Consistent: -All alternatives

Planning Document	Key Goals, Guidelines and Standards	Project Considerations	Consistency
NCFUA FRAMEWORK PLAN			
5.5e	5.5e: Roads shall be narrowed when they cross the open space system, at a minimum to eliminate parking, turn lanes and median strips. Where topography and resource sensitivity permit, bicycle and pedestrian ways should be within the Environmental Tier rather than comprising a portion of the road structure.	The Road Capacity and Bicycle Safety alternatives would have the narrowest cross section. None of the build alternatives would include on-street parking. The Road Capacity Alternative would have a 2-foot-wide striped center median, no special left- turn lanes, no bike lanes, and no pedestrian walkways. The center median for the other build alternatives would be 4 feet wide except at intersections and transitions. Topography and resource sensitivity preclude bicycle and pedestrian ways being separate from the bridge over the San Dieguito River, as that would require a second river crossing. The No Build Alternative would not change existing conditions	Consistent: -All alternatives
5.5f	5.5f: Roads which cross the 100-year flood plain shall be constructed above grade, using bridge or causeway structures.	All build alternatives would include a new bridge set above the 100-year flood level, and roadway raised on embankment above the 100-year flood level. However, none of the build alternatives span the entire existing 100-year floodplain on a bridge or causeway. The No Build Alternative is not above grade and experiences flooding.	Consistent: -None of the alternatives
6.1d	6.1d: Control the impact of roads on environmental tier lands by minimizing the number of road crossings of open space and requiring bridge structures to be built in order to allow continuous areas for movement of flora and fauna.	All build alternatives would include a new bridge that would be generally in the same place as the existing bridge. The Eastern Alignment Alternative and Roundabout Alternative would have a new bridge east of the existing bridge, outside of environmental tier lands. All bridge alternatives would have fewer piers and be higher than the existing bridge. The No Build Alternative would not change existing conditions.	Consistent: -All alternatives

Planning Document	Key Goals, Guidelines and Standards	Project Considerations	Consistency
NCFUA FRAMEWORK PLAN			
6.2a	6.2a: The Framework Plan diagram shows generalized road alignments for major roadways. Note: El Camino Real is indicated as a 4-lane Major Street with a projected LOS B between Del Mar Heights Road and Via de la Valle. Via de la Valle is indicated as a 4-lane Major Street with a projected LOS B between El Camino Real and El Camino Real North.	All build alternatives except the Bicycle Safety Alternative and the No Build Alternative would provide 4 travel lanes. Traffic analysis indicates the Road Capacity and Bicycle Safety alternatives would have LOS F in the future condition. The Roundabout Alternative would have LOS E and F at El Camino Real and Via de la Valle unless the ultimate design were constructed. Only the Eastern Alignment Alternative would provide full intersection improvements at this location.	Consistent: -All alternatives except Road Capacity, Bicycle Safety and No Build alternatives
6.4d	6.4d: When roads cross the environmental tier and topography permits, pedestrian and bicycle ways should be separated from the road in order to reduce the width of bridge structures and to provide pedestrians and bicyclists with a more appealing open space crossing.	The Environmental Tier is west of the existing El Camino Real road alignment. Topography does not permit separate pedestrian and bicycle ways because a second crossing of the river would be required. The Eastern Alignment Alternative and Roundabout Alternative would have a new bridge east of the existing bridge, outside of environmental tier lands, and the existing bridge would be demolished upon completion of construction. The No Build Alternative would not change existing conditions	Consistent: -All alternatives
8.1b	8.1b: Require provision of public facilities concurrent with need.	All build alternatives except the Bicycle Safety Alternative and the No Build Alternative would provide 4 travel lanes. Traffic analysis indicates the Road Capacity and Bicycle Safety alternatives would have LOS F in the future condition. The Roundabout Alternative would have LOS E and F at El Camino Real and Via de la Valle unless the ultimate design were constructed. Only the Eastern Alignment Alternative would provide full intersection improvements at this location.	Consistent: -All alternatives except Road Capacity, Bicycle Safety and No Build alternatives

Planning Document	Key Goals, Guidelines and Standards	Project Considerations	Consistency
SAN DIEGUITO RIVER REGIONAL PLAN			
Land Use Element	Preserve significant biological and cultural resources.	All of the alternatives except the Central Alignment and Lower Elevation alternatives would avoid or minimize impacts to the existing drainage ditch parallel to El Camino Real. None of the build alternatives would cause impacts to significant cultural resources. The No Build Alternative would not change existing conditions.	Consistent: -All of the alternatives except the Central Alignment and Lower Elevation alternatives
Land Use Element	Preserve the character and visual integrity of the open space corridor.	All build alternatives would involve a wider and higher bridge and roadway, which would increase the prominence of these facilities in the visual environment. The Road Capacity and Bicycle Safety alternatives would have the narrowest cross-section, but would be raised on retaining walls. The No Build Alternative would not change existing conditions. However, all alternatives would be located along the general alignment of existing El Camino Real, so would not change the character of the open space in the area. Berms would be constructed to protect appropriate marsh created on the JPA Mitigation Site west of El Camino Real from erosion and sedimentation from high river flow. The berms would be landscaped with native upland species and would be consistent with the configuration of berms installed downstream (west) for the San Dieguito Lagoon Wetlands Restoration Project.	Consistent: -All alternatives
Land Use Element	Protect the public health, safety, and welfare from the hazards of flooding and geologic forces.	All of the build alternatives would provide a bridge and roadway above the 100-year flood level, and a seismically safe structure for vehicular travel. The No Build Alternative would not change existing conditions.	Consistent: -All alternatives except No Build alternative
Land Use Element	Construction sites should be stabilized as rapidly as possible with temporary planting, temporary berming, and on- grade drainage devices.	Prompt replanting with native vegetation would be required in the plans and specifications. The No Build Alternative would not change existing conditions.	Consistent: -All alternatives

 Table 3.1-5

 Project Consistency with the San Dieguito River Regional Plan

Planning Document	Key Goals, Guidelines and Standards	Project Considerations	Consistency
SAN DIEGUITO RIVER REGIONAL PLAN			
Land Use Element	Revegetate manufactured slopes and other areas disturbed by construction with native, naturalized, and where possible, drought tolerant and fire resistant species.	Prompt replanting with native vegetation will be required in the plans and specifications. The No Build Alternative would not change existing conditions.	Consistent: -All alternatives
Land Use Element	Provide for the management of vegetation in floodways where it would not disturb significant biological resources.	Clearing of existing or planted wetlands is not anticipated to be needed to maintain hydraulic capacity in the river. The No Build Alternative would not change existing conditions.	Consistent: -All alternatives
Land Use Element	Discourage the use of riprap or other man-made embankment protection devices.	Newly created slopes in the river under the bridge, and the north bank upstream of the bridge would require erosion protection. Rip rap would be limited to the smallest area possible while still providing erosion protection on slopes too steep to allow successful planting of vegetation. The north river bank upstream of the bridge would be protected with buried stabilization materials that would be installed without disturbing the existing wetlands in the river or on the banks. The No Build Alternative would not change existing conditions.	Consistent: -All alternatives
Recreation/Open Space Element	Preserve and enhance the recreational potential of the San Dieguito River basin.	The Coast to Crest Trail Horse Park segment now exists along the entire southern edge of Horse Park to El Camino <u>Real.</u> All build alternatives except the Lower Elevation Alternative would raise the bridge high enough to accommodate an elevated multi-use trail under-crossing under the bridge <u>northern abutment</u> , <u>compatible with the existing Coast to Crest</u> <u>Trail alignment</u> . All of the build alternatives except the Roundabout Alternative would include a pedestrian/equestrian activated signal crossing at the Horsepark/Polo Club driveways. All of the build alternatives would provide for the ability of other entities to construct a cantilever trail extending from the western side of the new bridge. The No Build Alternative would not change existing conditions.	Consistent: -All alternatives except No Build alternative

Planning Document	Key Goals, Guidelines and Standards	Project Considerations	Consistency
SAN DIEGUITO RIVER REGIONAL PLAN			
Recreation/Open Space Element	Implement existing plans for City and County bicycle, hiking and equestrian trail systems.	All of the build alternatives except the Road Capacity Alternative would include bike lanes. All of the build alternatives except the Roundabout Alternative would include a pedestrian/equestrian activated signal crossing at the Horsepark/Polo Club driveways. All of the build alternatives would provide for the ability of other entities to construct a cantilever trail extending from the western side of the new bridge. The No Build Alternative would not change existing conditions.	Consistent: All build alternatives except the Road Capacity Alternative
Recreation/Open Space Element	Promote the creation of a riparian/habitat/trail corridor along the entire San Dieguito River.	All build alternatives would include wetlands creation for mitigation in the JPA Mitigation Site adjacent to the west edge of El Camino Real and south of the river. The mitigation concept would involve a corridor of riparian habitat along the north edge of the mitigation area, and appropriate marsh behind a protective berm planted with native species. The No Build Alternative would not change existing conditions.	Consistent: -All alternatives
Recreation/Open Space Element	Encourage expansion of riparian vegetation in the floodplain, except where it may inhibit the safe flood level flows of the river.	Build alternatives incorporate mitigation for impacts to wetlands. The planned mitigation site is the JPA Mitigation Site adjacent to the west edge of El Camino Real and south of the river within the 100- year floodplain. New wetlands would be created in this area consistent with JPA's plans. The No Build Alternative would not change existing conditions.	Consistent: -All alternatives
Recreation/Open Space Element	Integrate all approved recreation and preservation plans directly associated with the river basin. These should include the San Dieguito Lagoon Enhancement Program and presently planned trail systems, including equestrian and bicycle trails.	The Coast to Crest Trail Horse Park segment now exists along the entire southern edge of Horse Park to El Camino Real. All build alternatives except the Lower Elevation Alternative would raise the bridge high enough to accommodate an elevated multi-use trail under-crossing under the bridge northern abutment, compatible with the existing Coast to Crest Trail alignment. All of the build alternatives except the Roundabout Alternative would include a pedestrian/ equestrian activated signal crossing at the Horsepark/Polo Club driveways. The Road Capacity Alternative would not include bike lanes. The No Build Alternative would not change existing conditions.	Consistent: All alternatives except the Road Capacity, Roundabout, and No Build alternatives

Planning Document	Key Goals, Guidelines and Standards	Project Considerations	Consistency
SAN DIEGUITO RIVER REGIONAL PLAN			
Transportation Element	Minimize the number of highway crossings of the San Dieguito River basin as a means of maintaining visual character and quality. Where crossings are necessary, utilize bridge designs and grading practices that are sensitive to the visual and natural quality of the river basin.	All of the build alternatives would involve replacement and widening of the existing bridge in its current general alignment. Visual enhancements would include parkway landscaping with street trees such as coast live oak and shrubs such as coyote bush, slope landscaping with native shrubs, toyon, and hydroseed mix, Mission bell icon and light fixtures, and white decorative fencing/railing for the road and bridge (see Section 2.2.10). The No Build Alternative would not change existing conditions	Consistent: -All alternatives
Transportation Element	Integrate the pedestrian, bicycle and equestrian trails of the various jurisdictions.	The Road Capacity and Bicycle Safety alternatives would not provide pedestrian walkways. The Road Capacity Alternative would not provide bike lanes. All of the other build alternatives would provide elements to accommodate pedestrians, bicyclists, and equestrians, <u>including an</u> <u>elevated multi-use trail under-crossing</u> <u>under the bridge northern abutment,</u> <u>compatible with the existing Coast to Crest</u> <u>Trail Horse Park segment alignment</u> . The No Build Alternative would not change existing conditions.	Consistent: -All alternatives except Road Capacity, Bicycle Safety and No Build alternatives
Recommendations for Subarea I (San Dieguito River Valley)	Allow no infilling and encroachment in the floodplain which results in a net loss of the flood volume.	All of the build alternatives would steepen the slope of the abutments under the new bridge so that raising the roadway on embankment or retaining walls would not increase 100-year water surface elevations upstream above levels predicted under existing (2004) conditions. The No Build Alternative would not change existing conditions.	Consistent: -All alternatives
Recommendations for Subarea I (San Dieguito River Valley)	Continue City support of the San Dieguito Lagoon Enhancement Program where consistent with other City policies.	All of the build alternatives except the Lower Elevation Alternative would incorporate a raised undercrossing under the north abutment of the bridge to accommodate a multi-use trail for the <u>a</u> <u>component of the Coast to Crest TrailJPA</u> . All of the build alternatives would provide for the ability of other entities to construct a cantilever trail extending from the western side of the new bridge. The No Build Alternative would not change existing conditions.	Consistent: -All alternatives

Planning Document	Key Goals, Guidelines and Standards	Project Considerations	Consistency
SAN DIEGUITO RIVER REGIONAL PLAN			
Recommendations for Subarea I (San Dieguito River Valley)	For any proposed alteration to the low flow channel, including riprap, a hydrological study should be required to assure that other property will not be impacted by minor (10 to 20- year) flood flow.	No changes to the low flow channel of the San Dieguito River are planned. A drainage study was conducted for the project. Local drainage patterns parallel to the south edge of Via de la Valle would not be changed by the project, as high flows would be directed to the south and nuisance flows would be carried westward in a low-flow storm drain constructed within widened Via de la Valle. The No Build Alternative would not change existing conditions. Velocities and water surface elevations in the 10-year flow would be similar to existing conditions.	Consistent: -All alternatives except No Build alternative
Recommendations for Subarea I (San Dieguito River Valley)	Minimize grading during the rainy season, install sediment basins and/or energy dissipating structures, and ensure revegetation and stabilization of slopes before the onset of the rainy season.	These measures will be incorporated into the plans and specifications for the selected alternative. The No Build Alternative would not change existing conditions.	Consistent: -All alternatives
Recommendations for Subarea I (San Dieguito River Valley)	As an extension of the San Dieguito Lagoon Enhancement Program, provide for a riparian/habitat/trail corridor within the floodway east of I-5 that would extend to the Whispering Palms golf course.	The Coast to Crest Trail Horse Park segment now exists along the entire southern edge of Horse Park to El Camino Real. All build alternatives except the Lower Elevation Alternative would raise the bridge high enough to accommodate an elevated multi-use trail under-crossing under the bridge northern abutment, compatible with the existing Coast to Crest Trail alignment. None of the build alternatives would permanently interfere with existing or planned trails. All build alternatives would include wetlands creation for mitigation in the JPA Mitigation Site south of the river. The mitigation concept would involve a corridor of riparian habitat along the north edge of the mitigation area, and appropriate marsh behind a protective berm planed with native species. The No Build Alternative would not change existing conditions.	Consistent: -All alternatives

Planning Document	Key Goals, Guidelines and Standards	Project Considerations	Consistency
SAN DIEGUITO RIVER REGIONAL PLAN			
Recommendations for Subarea I (San Dieguito River Valley)	Construction of roadway improvements should be discouraged from encroaching into wetlands.	All build alternatives except the Central Alignment and Lower Elevation alternatives would avoid or minimize impacts to the existing drainage ditch parallel to El Camino Real. The Central Alignment and Lower Elevation alternatives would re-create the existing drainage ditch immediately to the east. All build alternatives would impact the existing drainage ditch parallel to Via de la Valle. All impacts to wetlands would be mitigated on the JPA Mitigation Site adjacent to the west side of El Camino Real and south of the river. The No Build Alternative would not change existing conditions.	Consistent: -All alternatives

Table 3.1-6			
Project Consistency with City of San Diego North City Local Coastal Program			

Planning Document	Key Goals, Guidelines and Standards	Project Considerations	Consistency
NORTH CITY LOCAL COASTAL PROGRAM			
North City Local Coastal Program Land Use Plan, 1981	Drainage and Flood Control To preserve as much as possible the natural attributes of both the floodplain and floodway without endangering loss of life and property.	All build alternatives would avoid increases in 100-year water surface elevations upstream. All build alternatives would involve an El Camino Real bridge and road above the 100-year flood level. The Central Alignment and Lower Elevation alternatives would re-create the open drainage ditch parallel to El Camino Real impacted by the project. The other build alternatives would avoid or minimize impacts to the open drainage ditch. All build alternatives would include wetlands creation for mitigation in the JPA Mitigation Site adjacent to the west edge of El Camino Real and south of the river.	Consistent: -All alternatives except No Build alternative
North City Local Coastal Program Land Use Plan, 1981	Floodplains and Hillsides The design and construction of drainage facilities should be predicated on protecting flood- prone areas against loss of life, significant property damage, and disruption of traffic or utility services. <i>Note: El Camino Real is</i> <i>within a Flood Hazard Area</i> <i>mapped in this General Plan</i> <i>Element.</i>	All build alternatives involve an El Camino Real bridge and road above the 100-year flood level. Raising the road on embankment would protect properties west of El Camino Real from sheet flow across the road that can occur now. The No Build Alternative would not change existing conditions.	Consistent: -All alternatives except No Build alternative
Revisions to the North City Local Coastal Program Land Use Plan Segment, 1988	1 (A): Channelization or other substantial alteration of rivers or streams shall be limited to (1) necessary water supply projects, (2) flood control projects where no other feasible method for protecting existing public or private structures exists and where such protection is necessary for public safety or to protect existing development, or (3) other development, a primary element of which is the improvement of fish and wildlife habitat. Such development may include new or expanded roads or highways that are essential to the economic health of the region, state or nation, provided they comply with all the provisions of part (B) of this policy and all other applicable policies of this local coastal program.	El Camino Real road widening is essential to the economic health of the region, in view of the severe congestion now occurring. In addition, a new bridge for vehicular travel is needed to protect drivers using the existing structure from flooding and geotechnical hazards. No substantial changes to the river are proposed for any of the build alternatives. The No Build Alternative would not change existing conditions.	Consistent: -All alternatives except No Build alternative

Planning Document	Key Goals, Guidelines and Standards	Project Considerations	Consistency
NORTH CITY LOCAL COASTAL PROGRAM			
Revisions to the North City Local Coastal Program Land Use Plan Segment, 1988	 1 (B): Any development permitted pursuant to the provisions of Subsection (A) shall do all of the following: (1) Incorporate all relevant findings of hydrological studies for the coastal watershed of the affected stream, including but not limited to erosional characteristics, flow velocities, and sediment transport; (2) Incorporate mitigation measures designed to assure that there will be no increase in the peak runoff rate from the developed site (3) Minimize stream scour, avoid increases in and reduce, where feasible, the transport of stream sediment to downstream wetlands (4) If channelization is determined to be necessary, the floodway of the stream shall accommodate a 100-year flood. To the maximum extent feasible, all artificial channels shall be constructed without removal of riparian vegetation, shall be designed to allow for riparian vegetation growth, and shall consist of natural bottoms and sides. 	 (1) See Section 3.7 for a discussion of hydrology and hydraulics in the watershed. The predicted flow velocities in the 100-year event are the same or lower with the proposed project than under existing bridge. Upstream of the existing bridge, the velocities with the proposed project are estimated to be higher than under existing conditions, and mitigation is proposed. (2) See Section 3.7 for a discussion of runoff and mitigation measures. The increased paved area of the road is negligible compared to the peak runoff locally and from the upstream watershed. The widened roadway would be designed with best management practices consistent with City and State stormwater regulations. (3) See Section 3.7 for a discussion of predicted river velocities. The velocities with the project would be the same or less than under existing conditions downstream of the existing bridge, and higher upstream of the bridge. Therefore, scour and transport of stream sediment could increase with the proposed project. The mitigation proposed is stabilization along the unprotected northern bank of the river by buried stabilization materials that can be installed without disturbing existing riparian vegetation in the river or on the banks. With mitigation in place, no additional sediment would be eroded from the river bank. Velocities in the more frequent 10-year flood would not be substantially different from velocities predicted under existing conditions, and would not be erosive. (4) No channelization of the river is proposed. 	Consistent: -All alternatives
Revisions to the North City Local Coastal Program Land Use Plan Segment, 1988	3 (A): A grading plan that incorporates runoff and erosion control procedures to be utilized during all phases of project development shall be prepared where such development is proposed to occur on lands that will be graded, filled, or have a slope of 25 percent or greater	The project would comply with municipal, regional, and state water quality control permits. A Storm Water Pollution Prevention Plan (SWPPP) would be prepared with current Best Management Practices (BMPs) for construction and post- construction conditions. The No Build Alternative would not change existing conditions.	Consistent: -All alternatives

Planning Document	Key Goals, Guidelines and Standards	Project Considerations	Consistency
Revisions to the	3 (B): Sediment basins shall be	The project would comply with municipal,	Consistent:
North City Local	installed in conjunction with the	regional, and state water quality control	-All alternatives
Coastal Program	initial grading operations and	permits. Storm Water Pollution Prevention	
Land Use Plan	maintained through the	Plan (SWPPP) would be prepared with	
Segment, 1988	development process as necessary	current Best Management Practices (BMPs)	
	to remove sediment from runoff	for construction and post-construction	
	waters draining from the land	conditions. The No Build Alternative would	
	undergoing development.	not change existing conditions.	

3.1.2.3 Proposed Projects

Specific proposed development projects in the area surrounding the El Camino Real Bridge/Road Widening Project were provided by the City of San Diego for use in analysis of cumulative impacts in this environmental document. The projects provided are listed in Table 4-1, and mapped in Figure 4-1. Of the development projects in Table 4-1, only the Rancho del Mar proposed senior housing project on the property south of Via de la Valle between El Camino Real and El Camino Real North would be adjacent to the proposed El Camino Real Bridge/Road Widening Project construction area. Pending infrastructure projects adjacent to the El Camino Real Bridge/Road Widening Project (Figure 3.1-2) are the following:

- Via de la Valle Bikeway: Class II and III temporary bikeway from San Andreas Drive to El Camino Real with a total length of about 1.1 miles. Eastern terminus coincides with intersection improvements at El Camino Real and Via de la Valle and may be directly affected, except for the Eastern Alignment Alternative.
- Widening of Via de la Valle Western Segment: Widening of two-lane portion to four lanes, from existing four-lane portion at San Andreas Drive easterly to El Camino Real. The intersection at El Camino Real and Via de la Valle is being coordinated to achieve compatibility.
- Sewer Pump Station 79: Demolish the existing sewer pump station, located east of Old El Camino Real on the north side of San Dieguito Road; the sewer pipeline extends southward in El Camino Real. The project also involves constructing a new pump house, wet well, and meter vault, and installing pumps, valves, piping, dual force mains, chemical storage tank, and electrical and instrumentation system.

The other proposed development projects in Table 4-1 are outside of the construction zone and would not be directly affected by construction of the El Camino Real Bridge/Road Widening Project. As shown on Figure 3.1-2, projects addressed as proposed in the 2006 Draft EIR that have since been completed include Villa Paraiso, Fairbanks Ranch Country Club Golf Course Expansion, Evangelical Formosan Church, Widening El Camino Real Southern Segment, and San Dieguito Lagoon Wetlands Restoration Project.

3.1.3 Impacts

Issues to be addressed are the following:

Issue 1: How would the proposed project implement the goals, objectives, and recommendations of the City of San Diego General Plan, the Framework Plan for the North City Future Urbanizing Area, and the City's adopted community plans and existing policies? Would the project be compatible with the surrounding existing and future planned land uses in the project vicinity?

Issue 2: Would the project result in a conflict with the purpose and intent of any current planning process or adopted environmental plans or policies in the current area?

Issue 3: Would the proposed project result in a conflict with the purpose and intent of the ESL regulations of the Land Development Code (LDC)?

Issue 4: Would the proposed project affect recreational activities or plans for recreational areas on adjacent properties?

Issue 5: How is the project consistent with the region's Multiple Species Conservation Program (MSCP) and the MSCP Subarea Plan?

3.1.3.1 Issue 1a: Compatibility with Planning Documents

General Plan. The consistency of the proposed project build alternatives with the current City of San Diego General Plan is discussed in Section 3.1.2.2. In general, the alternatives with complete features (i.e., four travel lanes, bike lanes, and pedestrian walkway/parkway) would be consistent with the key goals, guidelines and standards of the General Plan. These alternatives are the Central Alignment, Western Alignment, Eastern Alignment, Roundabout, and Lower Elevation. The Road Capacity and Bicycle Safety alternatives would not be consistent with many of the key goals, guidelines, and standards, mainly because the Road Capacity Alternative would not provide bike lanes and pedestrian walkway/parkway, and the Bicycle Safety Alternative would not provide four travel lanes or the pedestrian walkway/parkway. However, these conditions would not be substantially different from existing conditions. All of the build alternatives would involve widening and raising the bridge and roadway, which would increase the prominence of these facilities in the visual environment. Visual enhancements would include parkway landscaping with street trees such as coast live oak and shrubs such as coyote bush, slope landscaping with native shrubs and hydroseed mix, Mission bell icon and light fixtures, and white decorative fencing/railing for the road and bridge (see Section 2.2.10).

Strategic Framework Element. The consistency of the proposed project build alternatives with the City of San Diego Strategic Framework Element is evaluated in Table 3.1-3. As with the General Plan, the alternatives with complete features would be consistent with the key goals, guidelines and standards of the Strategic Framework Element. The Road Capacity and Bicycle Safety alternatives would not be consistent with the key goals, guidelines and standards because of the lack of bike lanes or travel lanes, and pedestrian walkway/parkways. However, these conditions would not be substantially different from existing conditions.

North City Future Urbanizing Area Framework Plan. The consistency of the proposed project build alternatives with the NCFUA Framework Plan is evaluated in Table 3.1-4. The alternatives with complete features would be consistent with many of the key goals, guidelines and standards of the Framework Plan. The Road Capacity Alternative would not be consistent

with Policy 6.4c because it would not provide bike lanes. The Bicycle Safety Alternative would not be consistent with Policy 6.2a and Policy 8.1b because it would not provide four travel lanes or pedestrian walkways. However, these conditions would not be substantially different from existing conditions.

None of the build alternatives would be consistent with Policy 4.10f (Development should not obstruct public views) because views to the west for travelers on the bridge would be impaired by the chain link fencing for the cantilever equestrian trail, which could eventually be installed on the new bridge if funded by other entities.

None of the build alternatives would be consistent with Policy 5.5f because none of the feasible build alternatives would cross the floodplain on a causeway. However, a bridge spanning the entire floodplain was considered and rejected in this EIR due to technical infeasibility and excessive costs (see Section 5.1).

All of the alternatives would be consistent with Policy 6.4d because the build alternatives would follow the existing alignment of El Camino Real or, in the case of the Eastern Alignment and Roundabout alternatives, would be outside of the environmental tier. Also, existing topography would not permit off-roadway pedestrian and bicycle ways because a second river crossing would have to be constructed.

Among the key policies of the NCFUA Framework Plan is 4.10a, which notes that "Within the 100-year floodplain fringe of the San Dieguito River, fill for roads and other public improvements and/or permanent structures will be permitted only if such development is consistent with the policies detailed in the North City Local Coastal Program (LCP)." As summarized in Table 3.1-4, Revisions to the North City LCP approved by the California Coastal Commission on January 13, 1988 note that "Channelization or other substantial alteration of rivers or streams shall be limited to . . . (2) flood control projects where no other feasible method for protecting existing public or private structures exists and where such protection is necessary for public safety or to protect existing development . . ." Consistency with the Local Coastal Program, including this policy, is summarized below. None of the alternatives propose channelization or substantial alteration of the San Dieguito River. The build alternatives would incorporate steepening of the abutments under the new bridge to avoid an increase in upstream 100-year water surface elevations, so would be consistent with this policy.

Consistency with the San Dieguito River Regional Plan. Relevant policies of the adopted City of San Diego San Dieguito River Regional Plan (City of San Diego 1984) are listed in Table 3.1-5. Most of the build alternatives would be consistent with the policies that are relevant to the proposed El Camino Real Bridge/Road Widening Project. All of the build alternatives involve widening and raising the bridge and roadway, which would increase the prominence of these facilities in the visual environment. Visual enhancements would include parkway landscaping with street trees such as coast live oak and shrubs such as coyote bush, slope landscaping with native shrubs and hydroseed mix, Mission bell icon and light fixtures, and white decorative fencing/railing for the road and bridge (see Section 2.2.10). The Road Capacity Alternative would not be consistent with the policies that call for implementation of bicycle lanes/trails. The Road Capacity and Bicycle Safety alternatives would not be consistent with the policy that calls for integration of pedestrian trails. However, all of the alternatives except the Lower Elevation Alternative would be consistent with connection goals of the plan, by providing a multi-use trail undercrossing under the north bridge abutment. All of the build alternatives would also facilitate connectivity by providing for the ability of other entities to construct a cantilever equestrian trail along the west side of the bridge.

Consistency with the North City Local Coastal Program. The consistency of the proposed project build alternatives with the City of San Diego North City Local Coastal Program is evaluated in Table 3.1-6. Specific revisions 1 (A) and (B), and 3 (A) and (B) made in 1988, which relate to channelization or other substantial alteration of rivers or streams and grading, are relevant to the proposed project. Overall, channelization or other substantial alteration of the San Dieguito River is not proposed by the project. Therefore, the proposed project build alternatives are consistent with the policies. In addition, bridge replacement is needed to protect drivers on the structure from flooding and geotechnical hazards. Therefore, the project is consistent with revision 1 (A).

As discussed in Section 3.7, the predicted flow velocities in the 100-year event would be the same or lower downstream (west) of the bridge, and higher upstream (east) of the existing bridge. Mitigation is proposed to protect the non-stabilized north bank of the river upstream of the bridge. The proposed bank protection would consist of buried stabilization materials that would be installed without disturbing the existing wetlands in the river and on the bank. The south bank already has bank protection. Therefore, the project is generally consistent with revisions 1 (B) (1) and (3).

The widened roadway would be designed with appropriate BMPs for runoff consistent with City and state storm water regulations, and the build alternatives would minimize impacts to the existing drainage ditch parallel to El Camino Real or recreate it. All alternatives would replace the existing open ditch parallel to Via de la Valle with a low-flow storm drain, but wetland impacts would be mitigated appropriately. Therefore, the project is consistent with revision 1 (B) (2). No channelization of the river is proposed. Therefore, the project is consistent with revision 1 (B) (4). Constructing the bridge would temporarily affect biological resources in the river, and result in permanent impacts at the bridge piers and from bridge shading. However, there would be fewer piers than with the existing bridge, which would be demolished for all of the build alternatives, and the new bridge would be higher than the existing bridge.

Issue 1a Conclusions. None of the alternatives would cause environmental impacts due to inconsistencies with approved planning documents.

3.1.3.2 Issue 1b: Compatibility with Existing Land Uses and Future Projects

Existing Land Uses. Right of way and temporary construction easement would be needed from several properties along Via de la Valle and El Camino Real. Needs would vary with the different alternatives. Relocation is not anticipated to be required of any property owner. The acquisition program would be conducted in accordance with the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended. Right-of-way negotiations would not occur until after completion of the environmental process, selection of an alternative, and completion of final design.

The properties that may be affected by the need for right of way are listed in Table 3.1-1. Potential impacts to Horsepark, a recreational property, are discussed separately in Section 3.1.3.6. Potential impacts to the Polo Club fields, an existing recreational property owned by the City, are discussed separately in Section 3.1.3.7. Potential impacts to Fairbanks Ranch Country Club Golf Course, which was expanded west to El Camino Real in 2003, are discussed separately in Section 3.1.3.8. Potential impacts to the fields west of El Camino Real and south of the river are discussed under Additional JPA Restoration, a future project on the property purchased by the JPA. The impact of potential agricultural land conversion on this property is discussed in Section 3.5. Impacts to other existing land uses are discussed below.

Mary' Tack and Feed. Impacts to Mary's Tack and Feed, a commercial/retail establishment located at the southwest corner of El Camino Real and Via de la Valle, would vary with the different alternatives. Right of way would be needed from the eastern side of this parcel, generally along the lower parking lot, for the Central Alignment, Western Alignment, Road Capacity, Bicycle Safety, and Lower Elevation alternatives. For most of the build alternatives. the elevation of the raised roadway would be approximately 7 feet higher than the existing road elevation at the driveway to Mary's Tack and Feed. Where the proposed alignment would be shifted to the east for the Eastern Alignment Alternative and Roundabout Alternative, impacts to this existing commercial establishment would be avoided. Where the proposed alignment would be shifted the most to the west for the Western Alignment Alternative, maximum impacts to this property would occur. The existing store building would not be affected by the proposed project alternatives for widening El Camino Real. The existing access driveway would need to be modified for all alternatives except the Eastern Alignment Alternative and Roundabout Alternative due to the higher road elevation. This would affect access to both Mary's Tack and Feed and All Creatures Animal Hospital located to the west. The proposed driveway from El Camino Real to the property access for all build alternatives except the Eastern Alignment Alternative and Roundabout Alternative would accommodate a WB-40 tractor trailer vehicle, which has a 7.5-foot long cab and a 33-foot long trailer. Vehicles would use existing El Camino Real as a frontage access road for the Eastern Alignment and Roundabout Alternative. Access impacts are analyzed in Section 3.2.3.2.

Private Property South of Via de la Valle and East of El Camino Real. Impacts to the undeveloped property located south of Via de la Valle and east of El Camino Real would occur along both the northern side and the western edge of the parcel. This property is currently being planned for the Rancho del Mar project. Right of way would be needed for widening along Via de la Valle, widening of El Camino Real, and replacement of the drainage ditch parallel to El Camino Real, depending on the alternative. Maximum impacts to this parcel would occur from the Roundabout Alternative, where the proposed alignment of El Camino Real would be shifted to the east and the alignment of widened Via de la Valle would be shifted to the south. Where the proposed alignment would be shifted the most to the west for the Western Alignment Alternative, impacts to this property would be minimized along El Camino Real, but would still occur along the northern side of the property, parallel to Via de la Valle.

Future Proposed Projects. As discussed in Section 3.1.2.3, the only development project that would be adjacent to the proposed El Camino Real Bridge/Road Widening Project construction area is the Rancho del Mar proposed senior housing project on the property south of Via de la Valle between El Camino Real and El Camino Real North, discussed above. The City is coordinating with this developer. The City is also coordinating with other City staff responsible for adjacent infrastructure projects, including Via de la Valle Bikeway, Widening Via de la Valle Western Segment, and Sewer Pump Station 79, in order to minimize conflicts. Widening El Camino Real Southern Segment has been completed; however, the Roundabout Alternative would impact the improvements that have been built by replacing the signalized intersection with a roundabout and slightly realigning the four-lane roadway approximately 350 feet to the south to provide an appropriate transition.

The JPA's plans to convert currently fallow agricultural fields to wetlands, if approved and implemented, would be affected minimally by El Camino Real road widening depending on the alternative. The wetland mitigation proposed on this property by the El Camino Real Bridge/Road Widening Project would help implement habitat restoration. Potential impacts to the JPA property are discussed further below.

Additional JPA Restoration Development. The JPA purchased approximately 70 acres of property formerly owned by Boudreau Trust of 1990, and is coordinating with SANDAG to develop a restoration plan on the property except in the SDG&E easement that encompasses the large transmission lines and fuel and gas lines that cross the property diagonally. In terms of impacts from the proposed road widening, only the Western Alignment Alternative would encroach west of the existing City of San Diego slope easement along the west side of El Camino Real. The slopes for the raised roadway would extend as much as 40 feet west of the bottom of the existing slope near the lengthened bridge. This may affect the eastern edges of the property. However, this property is the proposed location for biological resources mitigation for the El Camino Real Bridge/Road Widening Project. The mitigation plan is being coordinated with the JPA and SANDAG to help implement their restoration plans, representing a benefit to the SPA/SANDAG project. If the Western Alignment Alternative were selected, potential conflicts would be avoided by the joint planning that has already occurred with the City and the JPA and SANDAG, and will continue after alternative selection through final design and construction.

The JPA is also coordinating trail construction through the Del Mar Horsepark property on the north bank of the San Dieguito River west of El Camino Real. Early in 2012, the first half of the Lagoon Trail extension through Del Mar Horsepark was opened to the public. Trail users currently can access this stretch of trail by parking at the interpretive kiosk at the end of San Andres Drive and going east. This trail extension closely follows the north bank of the San Dieguito River that was restored with a wide variety of native plants. In December 2012, construction of the second half of the trail extension was begun. Several non-native trees were cleared out of the way, culverts and native plants were installed, and the decomposed granite (DG) trail surface was spread along the alignment. More DG, fencing, and signage was installed in 2013. Also, a new trail access will be has recently been provided near the entrance to Del Mar Horsepark off of El Camino Real, and with an interpretive kiosk for the east end of the trail-will be built. Once tThis additional quarter-mile stretch opens, it willhas increased the length of the Coast to Crest Trail at the San Dieguito Lagoon to 2.5 miles from Jimmy Durante Boulevard to El Camino Real (JPA 2013). For all alternatives except the Lower Elevation Alternative, the planned undercrossing trail under the north abutment of the proposed new bridge would facilitate connection of this new part of the Coast to Crest Trail to the east. The Lower Elevation Alternative would not preclude trail users from crossing El Camino Real by going to the access point near the entrance to Del Mar Horsepark and crossing to the Polo Fields property at the proposed controlled intersection with El Camino Real that would be constructed for all alternatives.

Issue 1b Conclusions. None of the alternatives would cause environmental impacts due to incompatibilities with existing land uses and future projects.

3.1.3.3 Issue 1c: Compatibility with Established Educational, Religious, or Scientific Uses

No established educational, religious, or scientific uses in the area are close enough to be affected by the project. The Evangelical Formosan Church is located on the east side of El Camino Real near Sea Country Lane, well to the south of the intersection with San Dieguito Road. The proposed project would not conflict with such uses.

3.1.3.4 Issue 2: Conflict with Environmental Plans or Policies

A portion of the project mitigation area west of El Camino Real lies within the boundaries of the City's MHPA (refer to Figure 1-2). Consistency of the project with requirements of MSCP and the MHPA in reference to Impact Issue 5 is discussed in Section 3.1.3.9.

The project location is within the boundaries of the focused planning area for the proposed San Dieguito River Valley Regional Open Space Park, which is being developed by the San Dieguito River Park JPA. Consistency of the proposed El Camino Real Bridge/Road Widening Project with the goals and objectives of the JPA for their recreational plans is addressed below.

The JPA has been empowered by its member agencies to, among other responsibilities, conduct overall planning for the San Dieguito River Park, and develop land use and development guidelines for the park's focused planning area. Member agencies of the JPA are the County of San Diego and the Cities of Del Mar, Escondido, Poway, San Diego, and Solana Beach. The major plans adopted by the JPA encompass two projects, the San Dieguito Lagoon Wetlands Restoration Project, and the San Dieguito River Valley Regional Open Space Park.

San Dieguito Lagoon Wetlands Restoration Project. The San Dieguito Lagoon Wetlands Restoration Project is a wetlands and uplands mitigation project developed by SCE as mitigation for their impacts from the SONGS. The JPA is a partner in the lagoon restoration project with SCE. The project boundaries are generally located from El Camino Real west to the ocean and include the publicly owned properties located south of Via de la Valle and north of the Carmel Valley planning area. Areas west of El Camino Real in the San Dieguito River Valley below an elevation of 10 feet above msl are part of the San Dieguito Lagoon Wetlands Restoration Plan. The wetlands created and restored by this project do not extend east of Horsepark, however.

Among the project features addressed in the joint EIR/EIS for the San Dieguito Lagoon Wetlands Restoration project is the excavation and dredging to promote regular tidal exchange at the inlet to the ocean, and construction of levees within the effective flow area of the San Dieguito River to maintain the existing sediment flows within the river and to the beach. Construction is now complete. Close coordination was conducted with the JPA to maximize project compatibility and minimize harm to publicly owned and accessible recreational lands. Potential impacts of the proposed project on the San Dieguito Lagoon Wetlands Restoration Project are evaluated in Section 3.7 of this EIR. The evaluation concluded that the river hydraulics downstream of the bridge would not change, so flood flows and sediment transport to the lagoon would not be affected. The wetlands mitigation plan for the El Camino Real Bridge/Road Widening Project boundary. The concept has been developed by the same hydraulic designer to be compatible with the lagoon project. Therefore, the proposed El Camino Real Bridge/Road Widening Project would not have direct or indirect effects on the Lagoon Wetlands Restoration Project.

San Dieguito River Valley Regional Open Space Park. The San Dieguito River Valley Regional Open Space Park project, which is being developed by the JPA, includes equestrian, pedestrian, and/or bicycle paths and river crossings on and adjacent to El Camino Real. This Regional Park and Open Space area will extend from the beach at Del Mar to Volcan Mountain just north of Julian. The 55-mile long regional park will be connected with the phased construction of a regional trail. This Coast to Crest trail is a planned multi-use trail for hikers, joggers, nature enthusiasts, equestrians, and bicyclists.

In 1994, the San Dieguito River Park Concept Plan was adopted to establish the goals for the future of the San Dieguito River Valley and to develop a planning framework for future park implementation. The park objectives presented in the concept plan are preservation of open space, conservation of sensitive resources, protection of water resources, preservation of the natural floodplain, retention of agricultural uses, and creation of recreational and educational opportunities.

The proposed El Camino Real project occurs within the focused planning area (FPA) of the San Dieguito River Park. The concept plan indicates that improvements to existing public facilities such as El Camino Real should be permitted in the FPA. However, improvements must be installed in a manner that minimizes environmental impacts, complies with CEQA, avoids impacts to existing and proposed park amenities, and is compatible with the objectives listed above. Close coordination is being conducted with the JPA to maximize project compatibility with regional recreational plans.

The current narrow condition of El Camino Real in the study area, which lacks pedestrian walkways and bike lanes, is not conducive to recreation uses in the area planned by the JPA. Also, the existing bridge does not have an elevated under crossing, so riders currently traverse the river to cross under the bridge. The existing elevation of the San Dieguito River channel is approximately 5 feet above msl, while the underside of the bridge (low chord) varies from approximately 19 feet above msl to 23 feet above msl. The clearance of approximately 14 feet is adequate for equestrians, but conditions are often wet. Several elements of most of the alternatives studied in this EIR for the proposed El Camino Real Bridge/Road Widening Project would facilitate or not preclude aspects of JPA recreational plans, as discussed below.

Consistency with the Park Master Plan. The Park Master Plan for the San Dieguito River Valley coastal area (San Dieguito River Park JPA 2000) indicates that the preferred alignment for the Coast to Crest Trail is located on the north side of the San Dieguito River between Jimmy Durante Boulevard and El Camino Real. A portion of the trail graphic from the Park Master Plan is presented in Figure 3.1-6. This figure from the master plan presents Segments 9 and 10 of the trail as being located on the north side of the river. The description of Segment 9 notes that "At the end of Segment 9 bicyclists would continue on by using the El Camino Real bike lanes while pedestrians and equestrians would go under the El Camino Real bridge (Segment 10) to access an existing public trail east of El Camino Real . . . Segment 10 is a 136-foot-long undercrossing under the El Camino Real bridge. The undercrossing would be designed as part of the final design for the future widening of El Camino Real, and environmental impacts would be evaluated at that time."

Segments 11 and 12, which extend southward to avoid the Del Mar Horsepark property, and have been completed. Segment 13, which extends northward on the west side of El Camino Real, are also is presented on Figure 3.1-6. These segments are and described as follows in the master plan:

"Segments 11 and 12 provide an alternative way to reach El Camino Real that would not bring the trail across Horsepark. Segment 11 is a 214 foot long low flow crossing of the San Dieguito River. This type of structure allows normal flows to flow under the crossing via culverts, but during high water conditions the trail would be underwater and would be impassable. Segment 12, a distance of 2,816 feet, crosses over the property located to the south of the river under the electric transmission lines. Segment 12 brings the trail to the intersection of San Dieguito Road where bicyclists can continue on via the bike lanes on San Dieguito Road. Segment 13 would extend along the west side of El Camino Real to bring the pedestrians and equestrians to a crossing under the El Camino Real bridge on the south side of the San Dieguito River. Again, the undercrossing would be designed as part of the final design for the future widening of El Camino Real, and environmental impacts would be evaluated at that time."

All of the proposed build alternatives except the Lower Elevation Alternative would provide a platform at about the 10-year flood level under the north abutment of the new bridge, in order to accommodate a multi-use undercrossing. The 10-year flood elevation is estimated to be 13 feet above msl. All of the alternatives except the Lower Elevation alternative would set the underside of the bridge deck (low chord) at about 25 feet above msl in order to provide 12 feet of vertical clearance between the raised platform and the bottom of the bridge deck. This elevation of the bridge is higher than the bridge would need to be to pass the 100-year flood, which is estimated to be approximately 20 feet above msl. By providing the elevated undercrossing under the north bridge abutment, and raising the bridge higher than necessary, all of the build alternatives except the Lower Elevation alternative would actively facilitate the preferred alignment of the Coast to Crest Trail. The new bridge for these alternatives would be approximately 6 feet higher than the existing bridge.

The Lower Elevation Alternative would only raise the bridge high enough to pass the 100-year flood, so an elevated platform undercrossing would not be a feature of this alternative. The underside of this bridge would be at an elevation of approximately 22 feet above msl, which would be 17 feet above the channel bed, but only 9 feet above the 10-year flood elevation. Although this alternative would not provide the undercrossing, it would not prohibit equestrians or other travelers from crossing under the bridge in the same way that occurs currently for the existing bridge.

All of the build alternatives except the Road Capacity Alternative would provide bicycle lanes as part of the widened roadway cross section. Therefore, all of the build alternatives except the Road Capacity Alternative would actively facilitate access to the Coast to Crest Trail for bicyclists continuing north on El Camino Real.

By not providing bicycle lanes, the Road Capacity Alternative would not facilitate access to the Coast to Crest Trail for bicyclists. However, bicyclists would not be prohibited from using the four-lane El Camino Real roadway in the Road Capacity Alternative because they could travel in the far right vehicle travel lane instead of a designated bike lane. This possible future condition would be an improvement from existing conditions, because there would be two vehicle travel lanes in each direction, which would provide the possibility for cars to move over for a bicyclist without risking heading into oncoming traffic.

None of the alternatives would include an elevated platform under the southern end of the bridge. None of the alternatives would actively facilitate the undercrossing portion of the alternative alignment for the Coast to Crest Trail located south of the San Dieguito River. However, the alternatives would not prohibit the <u>San Dieguito River ParkJPA</u> from constructing an undercrossing under the southern end of the bridge as part of their plans.

All of the build alternatives except the Road Capacity and Bicycle Safety alternatives would provide a pedestrian walkway along both sides of the widened roadway, and a sidewalk on the bridge, so would actively facilitate the alternative Coast to Crest Trail alignment for pedestrians. The Roundabout Alternative would provide the least beneficial conditions for pedestrians because intersections would not be signalized, but crosswalks would be provided away from the traffic circle portion of the alignment. All of the build alternatives would provide for the ability of other entities to construct a trail cantilever structure on the west side of the bridge for equestrian and other users, so all of the alternatives would facilitate this aspect of the JPA's plans.

In conclusion, some of the build alternatives for El Camino Real Bridge/Road Widening Project would actively facilitate many elements of both alignments of the Coast to Crest Trail, and none of the build alternatives would interfere with the JPA's ability to complete their trail through the study area. Also, none of the build alternatives would conflict with the purpose and intent of the Park Master Plan for the Coastal Area of the San Dieguito River Valley Open Space Park. **Consistency with the San Dieguito River Park Concept Plan**. The Concept Plan (San

Consistency with the San Dieguito River Park Concept Plan. The Concept Plan (San Dieguito River Park JPA 2002) was prepared to "formally establish the vision and goals for the future use of the San Dieguito River Valley . . .All future proposals within the planning area should be consistent with the goals, objectives and development standards set forth in this plan."

The segment of El Camino Real addressed in this recirculated EIR is on the match line between Landscape Unit A (Del Mar Coastal Lagoon) which extends from the ocean eastward to El Camino Real, and Landscape Unit B (Gonzales and La Zanja Canyons) which extends eastward from El Camino Real to Fairbanks Ranch. Appendix C of the Concept Plan provides goals and objectives for the San Dieguito River Park. Consistency of the proposed El Camino Real Bridge/Road Widening Project with relevant goals and objectives is discussed below.

<u>Floodplain</u>

The 100-year floodplain and sheetflow areas shall be maintained in open configuration with a natural channel and room for normal stream waters to meander through the floodplain.

- No infilling or encroachment in the floodplain which results in a net loss of flood water carrying capacity will be allowed.
- The 100-year floodplain and sheetflow areas will be reserved for open space uses such as recreation, wildlife habitat or agriculture; development will not take place within them.

<u>Consistency</u>: The proposed project would be consistent. All build alternatives include raising the roadway on embankment or retaining walls, which would block sheetflow flowing westward from the existing Polo Club fields to Horsepark. The proposed steepening of the bridge abutments would prevent a net loss of flood water carrying capacity resulting from raising the road.

<u>Conservation</u>

- Sensitive coastal habitats and species shall be protected, preserved and enhanced.
- Significant biological, historical, and cultural resources shall be preserved.

<u>Consistency</u>: The proposed project would be consistent. All alternatives except the No Build Alternative would impact biological resources; however, mitigation would result in no net loss of wetlands. The proposed mitigation site is the JPA property adjacent to the west edge of El Camino Real and south of the river. This area is in the Coastal Zone. This location for mitigation to compensate for impacts to sensitive biological resources that cannot be avoided was identified from a set of alternative mitigation sites in coordination with the permitting agencies. Mitigation for impacts to biological resources is discussed in Section 3.12.

No significant cultural resources have been identified in the project impact area; however, monitoring would be conducted during construction because of the potential for buried cultural resources.

<u>Design</u>

- Landscaping shall use native vegetation types that blend with the surrounding natural areas.
- Development shall be designed to avoid sedimentation, erosion, and other potential impacts to the watershed and the viewshed.

<u>Consistency</u>: The proposed project would be consistent. As discussed in Section 2.2.10, appropriate native vegetation would be used to landscape the parkway and slopes. The proposed plant palette would include street trees such as coast live oak and netleaf hackberry, and slope trees such as Torrey pine, redshanks, and western redbud. Row small shrubs and ground covers would include coyote bush, California fescue, California buckwheat, blue eyed grass, and California fuschia. Slope/native shrubs for the embankments and in front of the exposed face of the retaining walls for the Road Capacity and Bicycle Safety alternatives would include creeping sage, white sage, toyon, Indian fig, scrub oak, coffeeberry, and Our Lord's Candle.

All disturbed slope areas would receive erosion control hydroseed, and all slope areas that are 4:1 gradient or steeper would also receive storm water and erosion control fiber rolls. The proposed native hydroseed mix would consist of California sagebrush, coast sunflower, toyon, Nuttal's lupine, Mission red monkeyflower, purple needle grass, California blue bells, showy penstemon, lemonade berry, sugar bush, and blue-eyed grass, consistent with the mix approved for hydroseeding along Via de la Valle from San Andreas to El Camino Real.

Best management practices would be incorporated into plans and specifications to prevent sedimentation and erosion during construction, as well as after project completion. If the existing drainage ditch parallel to El Camino Real were eliminated by the road widening, the open ditch would be re-created on the east side of the widened roadway and appropriate wetland vegetation would be planted at acceptable mitigation ratios. Bank protection in the river will be provided where needed for mitigation, as discussed in Section 3.7.

<u>Circulation</u>

- The number of road crossing of the river basin and focused planning area shall be minimized. Where crossings are necessary, utilize designs that are sensitive to the visual and natural quality of the River Park.

<u>Consistency</u>: The proposed project would be consistent. By widening El Camino Real in its general existing location and replacing the bridge, the project minimizes crossings of the park area. The Eastern Alignment Alternative and Roundabout Alternative would curve the road farther to the east, but the existing bridge would be demolished so there would still be only one river crossing.. Visual enhancements would include parkway landscaping with street trees such as coast live oak and shrubs such as coyote bush, slope landscaping with native shrubs and hydroseed mix, Mission bell icon and light fixtures, and white decorative fencing/railing for the road and bridge (see Section 2.2.10).

Issue 2 Conclusions. The proposed El Camino Real Bridge/Road Widening Project would be consistent with the goals, objectives and development standards set forth in the San Dieguito River Park Concept Plan (San Dieguito River Park JPA 2002).

3.1.3.5 Issue 3: Conflicts with Environmentally Sensitive Lands Regulations of the Land Development Code

Definition of Environmentally Sensitive Lands. Section 14 (General Regulations) of the SDMC, LDC Article 3 (Supplemental Development Regulations), Division 1 (Environmentally Sensitive Lands Regulations) §143.0110 (a) define the following as environmentally sensitive lands:

- (1) Sensitive biological resources
- (2) Steep hillsides
- (3) Coastal beaches
- (4) Sensitive coastal bluffs
- (5) Special Flood Hazard Areas

The project footprint for the proposed El Camino Real Bridge/Road Widening Project contains sensitive biological resources (including wetlands) and is located in a Special Flood Hazard Area (the 100-year floodplain of the San Dieguito River). SDMC Section 1430141(b) requires applicants to confer with USFWS and CDFW to solicit input on wetland impact avoidance. Projects must demonstrate that recommendations from the resource agencies have been incorporated into the project design and that the selected alternative is the most sensitive design possible. The wetland deviations require conformance with the ESLs, SDMC Section 1430150. Findings of approval are required per SDMC Section 126.0504. Also, deviations within the Coastal Overlay require supplemental findings of economical viable use, SDMC Section 126.0708(b).

Allowable Uses. Uses allowed within environmentally sensitive lands are listed in Section 143.0130 of the LDC. Uses permitted in wetlands are limited to (1) aquaculture, wetlands-related scientific research and wetlands-related educational uses; (2) wetland restoration projects where the primary purpose is restoration of the habitat; and (3) incidental public service projects, where it has been demonstrated that there is no feasible less environmentally damaging location or alternative, and where mitigation measures have been provided to minimize adverse environmental effects. The portions of the proposed El Camino Real project that would affect wetlands would qualify under item (3), and the demonstration of feasibility and mitigation is contained in the technical analysis throughout this EIR. The mitigation proposed to be implemented on the JPA property west of El Camino Real and south of the river would qualify under item (2). The City is currently coordinating with SANDAG and Caltrans to incorporate the JPA mitigation area into a large-scale restoration effort that also includes mitigation for the North Coast Corridor. Given the coordination for the restoration in this area, it was determined that wetland mitigation on the JPA site would be consistent with the overall approach for the largescale effort.

Uses permitted within the floodway portion of a Special Flood Hazard Area are those allowed by the Open Space Floodplain (OF) zone. Development regulations set forth in Section 131.0231 of the LDC note that flood control facilities use is permitted with limitations in the OF zone. The limitations may include location limitations or the requirement for a use or development permit. The floodway of the San Dieguito River is not defined in this area. The floodway would have to be formally defined through hydraulic analysis and documentation approved by the Federal

Emergency Management Agency (FEMA), the City of San Diego, and the County of San Diego. Therefore, only the regulations for flood fringe apply.

Consistency with Applicable Environmentally Sensitive Lands Regulations. Table 3.1-7 summarizes consistency of the proposed project with the following regulations that are applicable to a public transportation facilities project:

- General Development Regulations for all Environmentally Sensitive Lands (Section 143.0140)
- Development Regulations for Sensitive Biological Resources (Section 143.0141)
- Development Regulations for Special Flood Hazard Areas (Section 143.0145)
- Supplemental Regulations for Special Flood Hazard Areas (Section 143.0146)
- Deviations from Environmentally Sensitive Lands Regulations (Section 143.0150)

All build alternatives would be consistent with the ESL regulations. In accordance with SDMC Section 1430141(b), the project team has conferred with USFWS and CDFW to solicit input on wetland impact avoidance. Meetings are documented in Appendix C of this recirculated EIR.

Furthermore, development in the City of San Diego is subject to restrictions discussed in the City of San Diego Land Development Code Biology Guidelines (2002). These guidelines have been prepared to ensure the consideration of environmentally sensitive lands located in the vicinity of proposed development. The City of San Diego Biology Guidelines Consistency Summary (provided as Appendix H of the Natural Environment Study [NES, ICF/Nordby 2015]) also addresses these guidelines. In order to attain City approval, the project must conform to the City's ESL regulations found in the Biology Guidelines of the Land Development Code, as well as the MSCP Subarea Plan. The 2002 Land Development Code, Biology Guidelines, as contained within the City of San Diego Biological Review References, were deemed appropriate as the project was considered "substantially complete" by the City as of April 25, 2002. The following guidelines apply to the proposed project:

1. Impacts to wetland areas are to be avoided if possible. Where impacts are unavoidable, mitigation would be proposed at specified ratios and would be consistent with the ACOE [USACE] policy of "no net loss" of wetlands. Unavoidable impacts include those that allow reasonable use of essential public facilities such as essential roads, sewer and water lines where no feasible alternative exists.

As discussed in Section 5.1.3, based on conceptual engineering design, a bridge spanning the entire floodplain to avoid wetland impacts could not meet the existing grade at Via de la Valle, and therefore would not be technically feasible. The proposed project would result in unavoidable impacts to wetland habitats as defined by the City of San Diego. As a result, mitigation would be provided per the mitigation ratios established in the City's Land Development Code Biology Guidelines (2002) and would be consistent with the USACE policy of "no net loss" of wetlands.

2. A wetland buffer must be maintained around all wetlands as appropriate to protect the functions and values of the wetland. In the coastal zone, a minimum 100-foot buffer is required.

El Camino Real crosses over the San Dieguito River, which precludes the maintenance of a wetland buffer between the proposed widened road and bridge and wetlands associated with the San Dieguito River. Currently, there is no wetland buffer between the existing bridge and wetland habitat associated with the San Dieguito River.

3. Within the MHPA, development must be located on the least sensitive portion of the site and designed to avoid covered species where feasible.

Impacts occurring to sensitive vegetation communities within the MHPA have been minimized, especially for the Eastern Alignment Alternative and Roundabout Alternative. Mitigation would be provided for all project impacts to sensitive vegetation communities.

Although the San Dieguito River and associated wetlands also are considered sensitive habitats, impacts to such areas are unavoidable due to the nature of the project (i.e., widening the bridge as it crosses the San Dieguito River). Thus, impacts to occupied light-footed clapper rail habitat are unavoidable. Mitigation in the form of habitat creation, restoration, and enhancement is proposed to offset project impacts to such sensitive areas. This is discussed further in Section 3.12.

Although coastal beaches and sensitive coastal bluffs would not be impacted, project features could be within the Coastal Overlay Zone. Deviations within the City's Coastal Overlay require supplemental findings of economical viable use in accordance with SDMC Section 126.0708(b).

The portion of the San Dieguito River in the project area does not have detailed FEMA floodplain mapping so does not have a designated floodway. A Conditional Letter of Map Revision (CLOMAR) has been approved for the changes to the floodplain proposed as part of the San Dieguito Lagoon Wetlands Restoration Project, but this proposed mapping revision does not extend east of El Camino Real. Hydraulic modeling for the El Camino Real Bridge/Road Widening Project has demonstrated the project would not increase 100-year flood levels above the water surface elevations predicted under current conditions. However, an application to FEMA for a CLOMAR would be prepared as part of final design of the selected alternative. The CLOMAR would address changes to the floodplain upstream of the bridge due to the road and bridge construction, and downstream of the bridge due to the wetlands mitigation plan.

Table 3.1-7
Consistency with Relevant Environmentally Sensitive Lands Regulations

Regulation Summary Project Considerations Consistency							
	gulations for all Environmentally Sensitive Lands	consistency					
(d) No temporary disturbance or A Site Development Permit will be obtained for Consistent:							
storage of material or equipment is	the entire project footprint, including the	-All alternatives					
permitted in environmentally	proposed staging area.						
sensitive lands unless approved by	r						
a Site Development Permit.							
143.0141 Development Regulations	for Sensitive Biological Resources						
(a) Applicant shall confer with the	Multi-agency coordination meetings have been	Consistent:					
U.S. Army Corps of Engineers,	held with these and other permitting agencies to	-All alternatives					
U.S. Fish and Wildlife Service	discuss issues including project features,						
and/or California Department of	alternatives, and mitigation site locations and						
Fish and Wildlife.	conceptual plans. See meeting summaries in						
	Appendix C of this EIR.						
(b) Impacts to wetlands shall be	A bridge spanning the entire floodplain to avoid	Consistent:					
avoided. Mitigation for impacts	wetland impacts could not meet the existing	-All alternatives					
associated with a deviation shall	grade at Via de la Valle, and therefore would not						
achieve the goal of no-net-loss and	be technically feasible. Unavoidable impacts to						
retain in-kind functions and values.	wetlands will be mitigated with wetlands creation						
	on the JPA Mitigation Site west of El Camino						
	Real and south of the San Dieguito River at						
	suitable ratios to achieve no-net-loss and with						
	vegetation to provide in-kind functions and						
	values. Coordination has occurred with USFWS						
	and CDFW to solicit input on wetland impact						
	avoidance. Where possible, input has been						
	incorporated into the project. The Roundabout						
	Alternative would require additional acreage of						
	wetland mitigation beyond the JPA Mitigation						
	Site. Additional suitable mitigation opportunities						
	exist within the project vicinity; therefore,						
	additional off-site mitigation would be						
	achievable for this alternative on a site owned by						
	the City. As discussed in EIR Section 3.12.1.1,						
	the City is currently coordinating with SANDAG						
	and Caltrans to incorporate the JPA mitigation						
	area into a large-scale restoration effort that also						
	includes mitigation for the North Coast Corridor.						
	Given the coordination for the restoration in this						
	area, it was determined that wetland mitigation						
	on the JPA site would be consistent with the						
	overall approach for the large-scale effort.	Consistent					
(e) Inside and adjacent to the	See Section 3.1.3.9 for detailed analysis of	Consistent:					
MHPA, all development proposals	consistency with the MSCP and MHPA	-All alternatives					
shall be consistent with the City of	adjacency guidelines.						
San Diego MSCP Subarea Plan.	The mitigation alon would conserve anistic	Consistent					
(f) Inside the MHPA, any change	The mitigation plan would convert existing	Consistent:					
of an agricultural use to a non-	fallow farmland to wetlands. The property is	-All alternatives					
agricultural use is subject to the	zoned AR-1-1 (Agricultural Residential), which						
development regulations of Section	allows natural resource preservation. Section 143.0141(d) does not apply.						
143.0141(d), which addresses the OR-1-2 zone (open space	143.0141(u) does not apply.						
residential).							

Regulation Summary	Project Considerations	Consistency
(i) All development in sensitive	Section 3.12 of this EIR presents a detailed	Consistent:
biological resources is subject to a	impact analysis of impacts to sensitive biological	-All alternatives
site-specific impact analysis, in	resources, and provides mitigation measures to	
accordance with the Biology	reduce significant impacts to below a level of	
Guidelines in the Land	significance, including creation of wetlands at	
Development Manual, with	ratios approved by the permitting agencies to	
corresponding mitigation	achieve no-net-loss at a site acknowledged to be	
determined.	suitable by the permitting agencies at multi-	
	agency coordination meetings (see meeting	
	summaries in Appendix C of this EIR).	
143.0145 Development Regulations		
143.0145 (f) (1): Within the flood	See Section 3.12 of this EIR for impacts to	Consistent:
fringe, development or fill will not	biological resources. The road must be raised to	-All alternatives
significantly adversely affect	be capable of withstanding flooding by being	
existing sensitive biological	above the 100-year flood level. See Section 3.7	
resources on-site or off-site; the	of this EIR for flooding analysis. The area does	
development is capable of	not have detailed FEMA floodplain mapping so	
withstanding flooding and does not	does not have a designated FIRM Zone A. The	
require off-site flood protective	proposed steepening of the bridge abutments	
works, nor will it cause adverse	would compensate for potential loss of peak flow	
impacts related to flooding of	storage capacity from fill across the floodplain,	
properties located upstream or	and would avoid increases in upstream 100-year	
downstream, nor will it increase or	water surface elevations. Velocities of the 100-	
expand a Flood Insurance Rate	year flow in the river downstream of the bridge	
Map (FIRM) Zone A; harm to peak	would be the same as in existing conditions, but	
flow storage capacity is minimized;	velocities upstream of the existing bridge would	
the development neither	increase with the proposed project. See Section	
significantly increases nor	3.7 for mitigation. Temporary BMPs during	
contributes to downstream bank	construction and permanent BMPs incorporated	
erosion and sedimentation nor	into the project design would protect water	
causes an increase in flood flow	quality.	
velocities or volume; there are no		
significant adverse water quality		
impacts.		
143.0146 Supplemental Regulations	s for Special Flood Hazard Areas	
(a) (2): Proposed development in a	The proposed steepening of the bridge abutments	Consistent:
Special Flood Hazard Area shall	would maintain 100-year water surface	-All alternatives
not adversely affect the flood	elevations at existing levels. The proposed	
carrying capacity of areas where	project would not increase upstream 100-year	
base flood elevations have been	water surface elevations.	
determined but the floodway has		
not been designated. "Adversely		
affect" means the water surface		
elevation of the base flood would		
not increase more than one foot,		
considering the proposed project		
and other cumulative development.		
(a) (6): Development in a Special	The area does not have detailed FEMA	N/A
Flood Hazard Area shall not	floodplain mapping so does not have a	
		1
	designated FIRM Zone A. The proposed project	
increase or expand a FIRM Zone A.	designated FIRM Zone A. The proposed project would not increase upstream 100-year water	

Regulation Summary	Project Considerations	Consistency
(a) (7): In all floodways, any	See Section 3.7 for the results of hydraulic	N/A
encroachment, including fill, new	analysis. The project study area does not have a	
construction, significant	designated floodway. The proposed project	
modifications, and other	would not increase upstream 100-year water	
development is prohibited unless	surface elevations.	
certification by a registered		
professional engineer is provided		
demonstrating that encroachments		
will not result in any increase in		
flood levels during the occurrence		
of the base flood discharge.		
(c) (2): All permitted permanent	The new El Camino Real roadway and bridge	Consistent:
structures and other significant	would be above the 100-year flood level.	-All alternatives
improvements shall be constructed		except No Build
with materials and utility		alternative
equipment resistant to flood		
damage.		
(f): The City Engineer shall notify	If needed, an application to FEMA for a	Consistent:
the San Diego District Offices of	CLOMAR would be prepared as part of final	-All alternatives
the Coastal Commission of any	design of the selected alternative. The	
pending changes to the adopted	CLOMAR would address changes to the	
Flood Insurance Rate Maps	floodplain upstream of the bridge due to the road	
affecting property within the	and bridge construction, and downstream of the	
Coastal Overlay Zone when the	bridge due to the wetlands mitigation plan.	
City Engineer receives notification		
of such potential changes. The		
City Engineer shall notify the		
Commission staff when coastal		
development within the City of San		
Diego's Coastal Development		
Permit jurisdiction would require		
processing a change to the FIRM		
maps. The City Engineer shall		
assure the Commission's District		
Office has the most current		
effective Flood Insurance Rate		
Maps approved by FEMA by		
forwarding any revised maps		
affecting the Coastal Overlay Zone		
within thirty working days of City		
Engineer's receipt.		

Regulation Summary	Project Considerations	Consistency
143.0150 Deviations from Environm	nentally Sensitive Lands Regulations	
(a) Deviations from the regulations of this division may be granted only if the decision maker makes the <i>findings</i> in Section 126.0504(c). Note: Findings in part (c) require making finding for parts (a) and (b) as well.	The project meets the findings for Site Development Permit approval in Section 126.0504(a) because: (1) the project would not adversely affect applicable land use plans as discussed in Section 3.1.3.1 of this recirculated EIR; (2) the project would not be detrimental to the public health, safety, and welfare but would improve traffic conditions, flood protection, and seismic condition of the bridge; and (3) the project would comply with the regulations of the LDC, including any allowable deviations. The project meets the findings for Site Development Permit approval in Section 126.0504(b) because: (1) The site is physically suitable for the design and siting of the proposed road and bridge and the project has been designed to minimize disturbance to environmentally sensitive lands; (2) The proposed road and bridge project has been designed to minimize the alteration of natural land forms and will not result in undue risk from geologic and erosional forces, flood hazards, or fire hazards, but would improve these conditions by replacing the bridge with a higher and seismically adequate structure; (3) The proposed project has been sited and designed to minimize adverse impacts on adjacent environmentally sensitive lands; (4) The proposed project would be consistent with the City of San Diego's MSCP Subarea Plan, as discussed in Section 3.12 of this recirculated EIR; (5) The proposed project will not contribute to the erosion of public beaches or adversely impact local shoreline sand supply because hydraulic patterns in the river would be maintained; and (6) The nature and extent of mitigation required as a condition of the permit is reasonably related to, and calculated to alleviate, negative impacts created by the proposed project, as discussed in Section 3.12 of this recirculated EIR.	Consistent: -All alternatives

Regulation Summary	Project Considerations	Consistency
	The project meets the findings for Site	
	Development Permit approval in	
	Section 126.0504(c) because:	
	(1) There are no feasible measures that can	
	further minimize the potential adverse effects on	
	ESLs due to the need to site the road and bridge	
	in the existing corridor and infeasibility of	
	alternative locations as discussed in Section 5.1	
	of this recirculated EIR; and (2) The proposed	
	deviation is the minimum necessary to afford	
	relief from special circumstances or conditions	
	of the land, (i.e., the presence of wetlands) not of	
	the applicant's making.	
143.0150 Deviations from Environ	mentally Sensitive Lands Regulations	
(b) Deviations from the	The project meets the findings for Site	Consistent:
Supplemental Regulations for	Development Permit approval in	-All alternatives
Special Flood Hazard Areas in	Section 126.0504(d) because:	
Section 143.0146 may be granted	(1) As documented by the hydraulic analysis in	
only if the decision maker makes	Section 3.7, the proposed project is not within a	
the <i>findings</i> in Section	designated floodway, and the proposed project	
126.0504(d).	would not increase upstream 100-year water	
	surface elevations; and (2) the deviation would	
	not result in additional threats to public safety,	
	extraordinary public expense, or create a public	
	nuisance because the new El Camino Real	
	roadway and bridge would be above the 100-year	
	flood level, thereby reducing risk and avoiding	
	public nuisance, and except for alternatives not	
	identified as feasible by FHWA the project is	
	partially funded by federal funds, thereby	
	reducing local public cost. The Road Capacity	
	and Bicycle Safety alternatives would not be	
	eligible for federal funding, but these alternatives	
	would not cost an extraordinary amount to	
	construct.	
	mentally Sensitive Lands Regulations	
(c) Within the Coastal Overlay	As illustrated on Figure 3.1-5, the existing	
Zone, deviations from the	Coastal Zone boundary lies along the eastern	
Environmentally Sensitive Lands	edge of existing El Camino Real. All alternatives	
Regulations may be granted only if	have some portion of the roadway within the	
the decision maker makes the	Coastal Zone, although the Eastern Alignment	
<i>findings</i> in Section 126.0708 (a)	and Roundabout alternatives would be east of the	
and (b).	Coastal Zone from the south bank of the river to	
	Via de la Valle. For all alternatives, the	
	mitigation site would be within the Coastal Zone.	
	Section 126.0708(-)(1)	
	Section 126.0708(a)(1) requires findings that the	
	proposed coastal development will not encroach	
	upon any existing physical accessway. This	
	finding can be made for all alternatives because	
	the project would replace the existing physical	
	accessway of El Camino Real with a raised and	
	widened roadway.	

Regulation Summary	Project Considerations	Consistency
	Section 126.0708(a)(1) also requires findings	Consistent:
	that the "proposed coastal development will	-None of the
	enhance and protect public views to and along	alternatives with the
	the ocean and other scenic coastal areas as	cantilever fencing for
	specified in the Local Coastal Program land use	Section
	plan." It may not be possible to make this finding	126.0708(a)(1)
	for all project alternatives. All of the build	
	alternatives would provide for the ability of other	-None of the
	entities to construct a cantilever trail extending	alternatives for
	from the western side of the new bridge. The	Section
	cantilever would enhance connectivity and	126.0708(a)(2)
	access, but views to the west for travelers on the	
	bridge would be impaired by the chain link	-All of the alternatives
	fencing for the cantilever equestrian trail, for all	for Section
	build alternatives. The bridge for the Eastern	126.0708(a)(3)Section
	Alignment and Roundabout alternatives would	126.0708(a)(4) is not
	not be within the Coastal Zone, but the cantilever	applicable
	fencing would block views similar to the other	
	build alternatives. Views would not be blocked	-All of the alternatives
	by the mitigation planned for the site west of existing El Camino Real that is within the	for Section
	Coastal Zone for all alternatives.	126.0708(b)
	Coastal Zolle for all alternatives.	
	Section 126.0708(a)(2) requires findings that the	
	proposed coastal development will not adversely	
	affect ESLs. This finding cannot be made for any	
	of the project alternatives because they all would	
	affect wetlands in the San Dieguito River and	
	within other areas of the project footprint.	
	" and one areas of the projection print	
	Section 126.0708(a)(3) requires findings that the	
	proposed coastal development is in conformity	
	with the certified Local Coastal Program land	
	use plan and complies with all regulations of the	
	certified Implementation Program. Table 3.1-6	
	evaluates Project Consistency with City of San	
	Diego North City Local Coastal Program, and all	
	alternatives are consistent.	
	Section 126.0708(a)(4) requires findings that	
	address coastal development between the nearest	
	public road and the sea or the shoreline of any	
	body of water located within the Coastal Overlay	
	Zone. This section does not apply to the	
	proposed project because several public roads lie	
	between the shoreline of the Pacific Ocean and	
	El Camino Real, including Camino Del Mar and	
	I-5.	
	Section 126.0708(b) requires supplemental	
	findings for deviations to ESLs within the	
	Coastal Overlay Zone. These findings are in	
	addition to findings in Section 126.0708(a) and	

Regulation Summary	Project Considerations	Consistency
	Section 126.0504(b), which are discussed above.	
	Section 126.0708(b)(1) requires findings that	
	each use provided for in the ESLs Regulations	
	would not provide any economically viable use	
	of the applicant's property. Section 143.0130(d)	
	lists uses allowed within wetlands in the Coastal	
	Overlay Zone as (1) aquaculture, (2) wetland	
	restoration, and (3) incidental public service	
	projects where it has been demonstrated that	
	there is no feasible less environmentally damaging location or alternative, and where	
	mitigation measures have been provided to	
	minimize adverse environmental effects. The	
	proposed roadway and bridge project should	
	qualify under (3), and the mitigation site would	
	qualify under (2). If the roadway and bridge	
	would not qualify under (3), then the project	
	could not be completed in an economically	
	viable way without impacting wetlands.	
	Section 126.0708(b)(2) requires findings that	
	application of the ESLs Regulations would	
	interfere with the applicant's reasonable	
	investment-backed expectations. This finding	
	can be made because the proposed project could	
	not be completed in an economically viable way	
	without impacting wetlands, and if the project could not proceed the funding already invested	
	and future funding that has been dedicated by	
	local and federal government would be wasted.	
	Section 126.0708(b)(3) requires findings that the	
	use proposed by the applicant is consistent with	
	applicable zoning. The proposed project is linear	
	infrastructure that would improve accessibility	
	and flood protection, would not change density,	
	and would be consistent with the zoning of	
	Agricultural Residential (AR) and Open Space-	
	Floodplain (OF) of properties within the project	
	footprint.	
	Section 126.0708(b)(4) requires findings that the	
	use and project design, siting, and size are the	
	minimum necessary to provide an economically	
	viable use of the premises. The alternatives	
	analysis presented throughout this recirculated	
	EIR document finds that only the full roadway	
	widening alternatives are considered viable for	
	federal funding, and these alternatives have been	
	reduced in width to the minimum needed since	
	distribution of the 2006 EIR.	

Regulation Summary	Project Considerations	Consistency
	Section 126.0708(b)(5) requires findings that the	
	project is the least environmentally damaging	
	alternative and is consistent with all provisions	
	of the certified Local Coastal Program with the	
	exception of the provision for which the	
	deviation is requested. The alternatives are compared in Section 5.3 of this recirculated EIR,	
	which documents that the Eastern Alignment	
	Alternative is the Environmentally Superior	
	Alternative of the Build alternatives and is the	
	least environmentally damaging alternative.	
143 0150 Deviations from Environ	nentally Sensitive Lands Regulations	
(d) Deviations to the wetland	Finding for Section 143.0150(d) (1) can be made	Consistent:
regulations of this Division for	for all alternatives. The proposed project is an	-All of the alternatives
development located outside of the	Essential Public Project because it consists of	
Coastal Overlay Zone shall not be	modifications to linear infrastructure which is a	
granted unless the development	major road and circulation element road that is	
qualifies to be processed as one of	now lacking bike lanes, but (for most	
the three options set forth in the	alternatives) bike lanes would be provided. All	
following regulations and in	build alternatives would provide accompanying	
accordance with the Biology	drainage systems and raise El Camino Real	
Guidelines in the Land	above the 100-year flood level.	
Development Manual:		
(1) Essential Public Projects Option		
(A) A deviation may only be requested for an Essential Public		
Project where no feasible		
alternative exists that would avoid		
impacts to wetlands.		
(B) For the purpose of this section,		
Essential Public Projects shall		
include [only those applicable to		
the proposed project are listed]:		
(ii) Linear infrastructure, including		
but not limited to major roads and		
land use plan circulation element		
roads and facilities including bike		
lanes, water and sewer pipelines		
including appurtenances, and storm		
water conveyance systems		
including appurtenances; or (iii) Maintenance of existing public		
infrastructure.		
mnasuucture.		1

3.1.3.6 Issue 4: Effects on Existing and Planned Recreational Facilities: Del Mar Horsepark

There are a number of recreational activities and plans on and for properties affected by the proposed El Camino Real Bridge/Road Widening Project. Effects on the goals and objectives of the JPA for the San Dieguito Lagoon Wetlands Restoration Project and the San Dieguito River Valley Regional Open Space Park were discussed in Section 3.1.3.4. Effects on the Del Mar Horsepark property (owned by the State of California 22nd District Agricultural Association) are discussed in this section. Effects on existing Polo Club fields (on property owned by the City of San Diego) are discussed in Section 3.1.3.7. Effects on the Fairbanks Ranch Country Club golf course (on property owned by the City of San Diego) are discussed in Section 3.1.3.8.

Del Mar Horsepark Existing Operations. Del Mar Horsepark (Horsepark) is a 65-acre equestrian facility located adjacent to the west edge of El Camino Real and the southern edge of Via de la Valle. The property is within the Coastal Zone. The property is owned and operated by the 22nd District Agricultural Association (22nd District), which is governed by a nine-member Board of Directors appointed by the Governor of the State of California. Information about the facility presented in this section was derived from the 2000 Master Plan, 22nd District Agricultural Association (Tucker Sadler Noble Castro Architects 2001) and the 2008 Master Plan Del Mar Fairgrounds and Horsepark (LSA Associates 2011). As discussed in the 2008 Master Plan, the 2000 Master Plan was never adopted by the 22nd District Board of Directors. Upon receiving additional input from a consultant team, the directors and staff of the 22nd District and Del Mar Thoroughbred Club, staff from the Cities of Del Mar, San Diego, Solana Beach, and the County of San Diego, and members of the public, the document was further revised and has become known as the Draft 2008 Master Plan.

The 22nd District is one of 54 agricultural districts that operate fairs around the state. Besides Horsepark, the 22nd District operates the Del Mar Fairgrounds, located approximately 12 miles west of Horsepark. Both the Fairgrounds and Horsepark are addressed in the 2000 Master Plan and 2008 Master Plan. The 2008 Master Plan notes that the anticipated actions at the Del Mar Horsepark are limited to short-term maintenance and repair effort. The maintenance and repair activities include renovation of the older stables, aesthetic upgrade to the covered arena, perimeter landscaping, and improvements to the public restrooms.

The focus of this analysis is on potential impacts to Horsepark, the property immediately adjacent to El Camino Real. The proposed El Camino Real Bridge/Road Widening Project would not have direct impacts to the Del Mar Fairgrounds property. However, to the extent that certain alternatives could require right of way from Horsepark along the western edge of the roadway for the widened road and slope easements, County Fair overflow parking that currently occurs in the Horsepark parking lot could be reduced. This issue is summarized below and addressed in detail in Sections 3.2.2.5 and 3.2.3.2.

Horsepark is described in the 2000 Master Plan as follows:

"It is a very highly valued facility for the region's horse owners and is used for many horse events, beginning and advanced horse training and long-term boarding. Invitational horse events at the facility are sometimes quite large, with up to 800 temporary stalls added to its existing 400-stall capacity horse show barns. Horsepark has a world class grass jumping arena with seating for 2,500, a covered lighted arena, four show rings, a cross-country jumping course, dressage ring and four training rings. Although devoted to year-round equestrian use, its parking area also serves as a satellite shuttle parking lot during the Fair."

Regarding offsite parking for the Fair, the 2000 Master Plan concluded that Horsepark parking provides adequate space on days when there is a need for about 3,000 additional spaces, since that lot "has the capacity to accommodate 4,000 cars over a full day." For peak days of 80,000 attendance at the Fair, there is a need to park about 9,000 cars offsite, so at those times, other offsite lots would be needed. The Fairgrounds was expected to continue to be able to find additional lots "as it has over the years" since the peak parking needs are usually on weekends and holidays. The 2000 Master Plan also notes that the Horsepark parking lot is occasionally used for temporary horse stables during horse shows.

The existing dirt parking lot is not striped for parking. It measures approximately 600 feet long by 240 feet wide. A rough estimate of available spaces in the unmarked dirt lot is 420 spaces, assuming spaces that are 8.5 feet wide by 20 feet long with 21-foot-wide aisles (see Section 3.2.2.5). Most of the alternatives would not affect the parking area. However, the Western Alignment Alternative would extend approximately 70 feet into the dirt lot, potentially eliminating an estimated 70 spaces in the dirt lot (see Section 3.2.3.2).

The facility is described in the 2008 Master Plan as follows: "In 1993 the 22nd DAA purchased Del Mar Horsepark, a 65 acre equestrian facility 1.5 miles east of the Fairgrounds. Del Mar Horsepark has two grass outdoor jumping arenas with seating for 1,325, a covered lighted arena, four show rings, a dressage ring, and four training rings. It hosts a growing number of equestrian events each year, including major horse shows." The 2008 Master Plan notes that "Del Mar Horsepark functions year-round as a successful public equestrian facility. It hosts competitive events and training from beginning levels to Olympic-caliber and provides many local residents with horse stabling. As the facilities age and the demand for facilities and events increases, and new environmental regulations are implemented, there will be the need to renovate and improve the existing infrastructure and facilities at the Horsepark."

Horsepark Drainage and Flooding. Drainage and flooding are issues of concern for the facility. The 2000 Master Plan notes that the Horsepark drainage system "is limited to a grass-lined channel that conveys a small portion of the site drainage and offsite flow from a tributary area that is located north of Via de la Valle. The remainder of the site sheet flows to the San Dieguito River." The 2000 Master Plan indicates that this channel also collects storm flow from the barn and horse wash facilities (via a drainpipe) that are located in the center of the complex, and that a series of culverts emanating from the channel discharge runoff to the river.

The 2000 Master Plan utilized the San Dieguito River HEC-2 study that was performed for the Southern California Edison Wetland Restoration Project to delineate 100-year flood elevations in the Master Plan study area, through Horsepark. Based on this evaluation, the 2000 Master Plan concluded that a portion of Horsepark area would be flooded in a 100-year storm, and El Camino Real would be flooded. The 2000 Master Plan also noted that FEMA has applied a Zone A designation for much of the San Dieguito River (meaning that FEMA flood elevations have not been determined, although a floodplain boundary has been identified by non-detailed hydraulic methods). Therefore, "if Horse Park is elevated with fill material, or leveed to provide 100-year flood protection, then detailed hydraulic analysis would be required to determine floodplain elevations and to establish a floodway boundary."

Horsepark 2000 Master Plan Recommendations. The 2000 Master Plan cites the following Primary Planning Objective for Horsepark: "Maintain Horse Park as a regional, first class equestrian center serving the public, and generally improve facilities to enhance its program of activities." The following are the specific recommendations for the property:

- Explore alternate river trail alignment options with JPA
- Plan for a phased implementation of stabling facilities (including temporary barns, new stables with a capacity for 200 to 300 horses, and rebuilding existing stables)
- Improve Horsepark operations office (to an office complex located adjacent to the large parking lot)
- Upgrade existing covered arena and provide improved bleacher seating and additional box seating; add a shade cloth over seating in the main outdoor arena
- Improve existing parking lot with permeable all-weather surfacing (to accommodate year round activities/programs)
- Initiate a program of edge tree planting
- Upgrade the existing RV lot; construct three new public restroom buildings

Landscape recommendations for El Camino Real highlight a rural country road landscape and suggest that "historic landscape plantings . . . lining the side of the roadway will create open views to the facilities and provide a rural character often repeated within the surrounding area." The landscape recommendations also suggest enhancement of the entry with low-growing flowering shrubs and groundcovers with accent flowering trees.

The 2008 Master Plan notes that "Aesthetics at the facility could benefit through a program of upgrades to its older stables and most public areas, such as the covered arena, dirt parking lot, perimeter landscaping, and public restrooms. Shade structures over seating areas in the main outdoor arena, as well as bleachers within the covered arena, are greatly needed."

Services and Fees at Horsepark. Del Mar Horsepark/22nd District staff provided the following information about recreational services provided to the public and charges for such services (Bartling, Personal Communication, 2003):

Del Mar Horsepark is a 65-acre, multi-use public recreational facility, hosting world class equestrian events, dog agility exhibitions and many other sporting events, which with very few exceptions, are available to the public free of charge. Horsepark is a community resource for the residents of San Diego County, providing invaluable exposure to the beauty and mastery of the equestrian world; which is quickly becoming unavailable to the general public as urban development encroaches on equestrian facilities throughout the County.

Horsepark also provides free parking and shuttle service for the San Diego County Fair, with almost 100,000 patrons shuttled during the 2003 Fair.

Horsepark is home to:

- 2+ acre Grand Prix grass jumping field;
- 2+ acre South grass jumping field; and
- a 50,000 sq. ft. Covered Arena.

Del Mar Horsepark was the venue for the:

- 2000 US Olympic horse jumping finals; and,
- 2002 World Cup horse jumping finals.

Del Mar Horsepark schedule of free, public show events each year includes:

- 8 World Class A rated horse jumping competitions;
- 12 County Hunter/Jumper horse shows;
- 4 Dressage horse shows;
- 1 Andalusian Horse Show;
- 1 Quarterhorse Show;
- 1 Plantation Walking Horse Show;
- 7 Dog Shows, including Make A Wish Charity Dog Show with free public admission;
- Solana Beach/Del Mar Bocce Ball Tournament; and,
- The California Thoroughbred Sales.

The event promoters pay fees for the rental of Horsepark areas. There are no memberships or dues required. Generally, there is no charge to enter, park or view the horse or dog shows, although some events may have a parking and/or admission fee.

Del Mar Horsepark is used for:

- Free satellite San Diego County Fair public parking for up to 8,000 people a day, ncluding free shuttle bus service to the Fairgrounds. For the 2003 San Diego County Fair almost 100,000 people parked at Horsepark and shuttled to the Fair.
- Public parking for the Buick Open with shuttle service to the Torrey Pines Golf Course;
- Evacuation center for any animals in the County during natural and manmade disasters. During the Dehesa fire horses, farm animals and dogs were boarded.

Del Mar Horsepark is an event site and a permanent boarding facility with:

- Over 200 stall and pipe corrals for year around boarding;
- 12 full time trainers;
- 11 rings;
- No requirements for dues or memberships

Boarding is open to the public and based upon availability. Box stall and pipe corral vacancies are filled via word of mouth and Horsepark has been at 100 percent capacity for years.

The following opinion regarding impacts was offered by Horsepark/22nd District staff (Bartling, Personal Communication, 2003):

"Del Mar Horsepark is an important multi-use public recreational facility that must retain the current parking areas, fields, structures and rings in order to operate at the World Class level. If the facility is negatively impacted by the road widening, Horsepark will lose the space needed for portable stalls, parking for trailers, cars and horse vans. This would directly cause a loss of all Class A Shows, therefore denying the public the ability to participate in and view Class A Horse Shows. If the road project negatively impacts the front parking area, it would also curtail the free, satellite parking offered to the public at the annual San Diego County Fair, which is attended by over one million visitors every year."

Impacts on Existing and Planned Operations from Road Widening. In requiring longitudinal right of way, slope easement, and temporary construction easement from the Horsepark property west of El Camino Real, certain alternatives for the proposed project would reduce the area available for temporary horse stalls, the entry, and parking for Horsepark and special events, including the Del Mar Fair. Primary recommended improvements in the Master Plan potentially affected by some alternatives for widening El Camino Real are non-paved dust control for the parking lot, and upgraded landscaping features at the entry and along El Camino Real. Impacts would vary with the different alternatives, depending on the intrusion into the Horsepark property. Table 3.1-8 estimates the distance into the Horsepark property that the proposed project would intrude for right of way for the roadway plus slope easement for the embankment slopes, and additional temporary construction easement.

Property	Central Alignment feet	Road Capacity & Bicycle Safety feet	Western Alignment feet	Eastern Alignment and Roundabout feet	Lower Elevation feet
Right of way for widened road plus slope easement*	1	20	89	0	1
Additional temporary construction easement	15	15	0	0	15

Table 3.1-8Estimated Intrusion into Horsepark Propertyin Feet West of Property Line Parallel to El Camino Real

* The Road Capacity and Bicycle Safety alternatives have vertical retaining walls instead of road embankment slopes

The proposed project would have the impacts to existing and planned operations presented in Table 3.1-9. This table also indicates whether or not an alternative would eliminate the revenue the 22nd District receives from the City of San Diego for the Polo Club field overcrossing over the drainage ditch east of El Camino Real, which is 22nd District property. The Western Alignment Alternative would have the greatest impacts on the Horsepark property. The intrusion into the property would add to intrusions this property is already experiencing on its northern boundary from Via de la Valle widening and on its southern boundary from recreational trail plans by the JPA. The Eastern Alignment and Roundabout alternatives would have the least impacts on the Horsepark property.

To reduce impacts to the Horsepark property, during final design of the selected alternative designers will coordinate with 22nd District and Horsepark operations staff on the design of Horsepark driveway, restoration of entry area, design of elevated undercrossing under the north bridge abutment, design and installation of pedestrian/equestrian signal (except for the Roundabout Alternative), and construction timing. Also, in order to obtain property for the project, all land acquisition shall be conducted in accordance with the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended.

Impact	Central Alignment	Road Capacity and Bicycle Safety	Western Alignment	Eastern Alignment and Roundabout	Lower Elevation
Reduction in temporary horse stalls north of driveway (Existing Operation)	Not expected. Widened road embankment would be within existing slope.	Widened road retaining wall would be within existing slope. Temporary reduction may occur for construction easement, but timing could reduce impact.	Reduction expected due to widened road and embankment slope.	None.	Not expected. Widened road embankment would be within existing slope.
Reduction of entry area (Existing Operation)	Rebuilding existing driveway at higher elevation would reduce entry area.	Rebuilding existing driveway at higher elevation would reduce entry area.	Road widening and embankment slopes, plus rebuilding existing driveway at higher elevation would reduce entry area.	Rebuilding existing driveway at higher elevation may reduce entry area.	Rebuilding existing driveway at higher elevation would reduce entry area.
Reduction of parking spaces south of entry for on-site events and Del Mar Fair (Existing Operation)	Not expected. Widened road embankment would be within existing slope.	Widened road retaining wall would be within existing slope. Temporary reduction may occur for construction easement, but timing could reduce impact.	Reduction expected due to widened road and embankment slope. An estimated 70 spaces in the unmarked dirt lot would be eliminated.	None.	Not expected. Widened road embankment would be within existing slope.

 Table 3.1-9

 Impacts on Existing and Planned Horsepark Operations

Impact	Central Alignment	Road Capacity and Bicycle Safety	Western Alignment	Eastern Alignment and Roundabout	Lower Elevation
Effect on flooding (Existing Operation)	Eliminate flow over El Camino Real from the east. No increase in 100-year flood elevations west of El Camino Real.	Eliminate flow over El Camino Real from the east. No increase in 100-year flood elevations west of El Camino Real.	Eliminate flow over El Camino Real from the east. No increase in 100-year flood elevations west of El Camino Real.	Eliminate flow over El Camino Real from the east. No increase in 100- year flood elevations west of El Camino Real.	Eliminate flow over El Camino Real from the east. No increase in 100- year flood elevations west of El Camino Real.
Effect on drainage (Existing Operation)	Internal drainage that currently travels eastward would be routed under the widened roadway to the recreated drainage ditch parallel to El Camino Real. Runoff from the widened road would be routed eastward.	Internal drainage that currently travels eastward would be routed under the widened roadway to the existing drainage ditch parallel to El Camino Real. Runoff from the widened road would be routed eastward.	Internal drainage that currently travels eastward would be routed under the widened roadway to the existing drainage ditch parallel to El Camino Real. Runoff from the widened road would be routed eastward.	None.	Internal drainage that currently travels eastward would be routed under the widened roadway to the recreated drainage ditch parallel to El Camino Real. Runoff from the widened road would be routed eastward.
Effect on dust control project (Planned Operation)	Permanent impacts not expected. Construction would increase dust levels temporarily.	Permanent impacts not expected. Construction would increase dust levels temporarily.	Encroachment of widened road and embankment slopes into parking lot area. Drainage would be routed to the east, and slopes would be vegetated for erosion control. Construction would increase dust levels temporarily.	Permanent impacts not expected. Construction would increase dust levels temporarily.	Permanent impacts not expected. Construction would increase dust levels temporarily.

Table	3.1-9	(continued)
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Impact	Central Alignment	Road Capacity and Bicycle Safety	Western Alignment	Eastern Alignment and Roundabout	Lower Elevation
Effect on upgraded entry landscaping (Planned Operation)	Area reduced, and new slopes created by rebuilding driveway. The proposed project plant palette (see Section 2.2.10) would be applied, unless Horsepark desires changes.	Area reduced, and new slopes created by rebuilding driveway. The proposed project plant palette (see Section 2.2.10) would be applied, unless Horsepark desires changes.	Area reduced more than for the other alternatives, and new slopes created by rebuilding driveway. The proposed project plant palette (see Section 2.2.10) would be applied, unless Horsepark desires changes.	New slopes created by rebuilding driveway. The proposed project plant palette (see Section 2.2.10) would be applied, unless Horsepark desires changes.	Area reduced, and new slopes created by rebuilding driveway. The proposed project plant palette (see Section 2.2.10) would be applied, unless Horsepark desires changes.
Effect on proposed edge landscaping (Planned Operation) Elimination of revenue to Horsepark from City for drainage ditch overcrossing to Polo Club field? (Existing Operation)	Minimal reduction of area; creation of embankment slope would require revision of concepts. Yes	Minimal reduction of area; creation of retaining wall would require revision of concepts. No	Substantial reduction of area; creation of embankment slope would require revision of concepts. No	None. Additional frontage from vacated existing El Camino Real south of the driveway may be available. Yes	Minimal reduction of area; creation of embankment slope would require revision of concepts. Yes

Table 3.1-9 (continued)

3.1.3.7 Issue 4: Effects on Existing and Planned Recreational Facilities: Polo Club Fields

Existing Operations. The Polo Club fields are on a 120-acre City-owned parcel that is situated east of El Camino Real and directly across from Horsepark. The property is located in the AR-1-1 (Agricultural Residential) base zone, just outside (east) of the Coastal Overlay Zone, and is located within the Fairbanks Country Club Specific Plan.

The property is leased to the San Diego Polo Club and has been used for polo matches and other recreational events. The Rancho Santa Fe Polo Club had a lease with the City that had a term defined as "26 years commencing on the first day of the calendar month following execution by the City Manager." The contract was signed by the City on March 31, 1986, and ended in 2012. Clause 1.05b of the contract states that "CITY reserves the right to grant and use easements or establish and use rights-of-way over, under, along and across the leased premises for utilities, thoroughfares, or access as it deems advisable for the public good."

Other events held on the property include soccer tournaments hosted by San Diego Surf Cup, Inc. The Surf Cup noted in a comment letter on the 2006 Draft EIR that they hold a contract with San Diego Polo Club dated January 1, 1998, wherein they are permitted to use the Polo Fields for soccer tournaments through December 31, 2013. According to the comment letter, Surf Cup is reputed to be the largest annual sporting event in San Diego County, akin to a large convention. The tournaments operate pursuant to special events permits issued on a tournament by tournament basis by the City. In addition to the tournaments, the Surf Cup contract with the Polo Club includes providing field space to the Surf Soccer Club for general practices for eleven months of the year and games throughout the fall. According to the comment letter, the Surf Cup games are played at the San Diego Polo Club on 18 full-sized fields.

The San Diego Polo Club has held polo matches at the facility on Sundays from May through October. In addition to polo matches, other events have been held at the area during the year. The San Diego Polo Club has handled arrangements for traffic control during these events.

According to the San Diego Polo Club website (www.sandiegopolo.com) in March 2012, the San Diego Polo Club was originally established in 1986. The Club includes an exercise track, riding trails, a clubhouse, a polo training school, and an outdoor lighted arena. The club's seasons consist of regular practices, matches, and tournament play, including several prestigious United States Polo Association competitions. Various levels of polo are offered throughout the season. A Social Membership, which includes admission to all Sunday polo matches, is \$350 for a single membership and \$600 for a family in 2012.

Permanent facilities on the property near El Camino Real are limited to the grass fields. Approximately 32 ornamental trees line the white rustic fence and dirt access road along the western edge of the property, parallel to El Camino Real. The drainage ditch next to the road is within a narrow property owned by the 22nd District Agricultural Association, as discussed in Section 3.1.3.6.

Impacts on Existing Polo Club Operations from Road Widening. Land currently occupied by the fence, access road, and western edge of the grass fields would be affected to various degrees by the longitudinal right of way, slope easement, and temporary construction easement that would be needed for the build alternatives of the proposed road/bridge widening project.

Impacts would vary with the different alternatives, depending on the intrusion into the polo fields area. Table 3.1-10 estimates the distance into the property that the proposed project would intrude for right of way for the roadway plus slope easement for the embankment slopes, and additional temporary construction easement.

Based on coordination with City of San Diego Real Estate Assets staff, the proposed project would have the following impacts to existing facilities on the Polo Club fields:

- Landscaping parallel to El Camino Real
- Access road parallel to El Camino Real
- Tent set-up area
- Grass field area

Table 3.1-10Estimated Intrusion into Polo Club Fields Areain Feet East of City Property Line Parallel to El Camino Real¹

Property	Central (feet)	Road Capacity & Bicycle Safety (feet)	Western (feet)	Eastern (feet)	Round- about	Lower Elevation (feet)
Right of way for widened road plus slope easement	69	0	0	205^{2}	205^{3}	64
Additional right of way for recreated drainage ditch with a 9.1-m (30- foot) bottom width and 1.2-m (4-foot) depth.	50	0	0	0	0	50
Additional temporary construction easement	20	0	0	20	20	20

¹The State of California 22nd District Agricultural Association owns the narrow parcel adjacent to El Camino Real that encompasses the drainage ditch

²Additional area would be needed for entrance driveway intersection

³Additional area would be needed for entrance driveway roundabout

Based on the above evaluation of land area, existing and potential activities on the City's property would not be precluded in the future by any of the proposed alignments for El Camino Real.

To reduce impacts to the Polo Club fields, during final design of the selected alternative designers will coordinate restoration and replacement of affected facilities on the property with City of San Diego Real Estate Assets and the current lessee. Anticipated work would include replacement of access road, fencing, landscaping and adjustment of play area for allowed uses, depending on the alternative. Also, in order to obtain property for the project, all land acquisition shall be conducted in accordance with the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended. Although the property is owned by the City, the existing drainage ditch parallel to El Camino Real is on property owned by the 22nd District.

3.1.3.8 Issue 4: Effects on Existing and Planned Recreational Facilities: Fairbanks Ranch Country Club Golf Course

Golf Course Development. As noted in Section 3.1.2.1, approximately 80 percent of the Fairbanks Ranch Country Club area, most of which is in the floodplain of the San Dieguito River, was designated as open space in the Fairbanks Ranch Specific Plan (City of San Diego 1982). The Specific Plan notes that as open space, "the floodplain could be used for one or more of the following uses: preservation of natural resources, agriculture, outdoor recreation and scenic enjoyment. Outdoor recreation includes a range of uses from passive uses (riding/hiking trails or picnicking) or active uses including but not limited to a golf course." The property of the open space is owned by the City of San Diego and leased to the operator, formerly Watt Industries/San Diego, Inc., now Fairbanks Ranch Country Club.

The EIR for the Fairbanks Country Club Development (American Pacific Environmental Consultants 1981) addressed a "General Plan Amendment, Prezone, Specific Plan, Annexation, Tentative Subdivision Map, Planned Residential Development, Land Development Permit, and Conditional Use Permit to construct 341 residential units and a 27-hole golf course and clubhouse on 783 acres in the A-1-10 Zone." The project implemented a 300-foot-wide engineered flood control channel east of El Camino Real that replaced the previously meandering path of the San Dieguito River through the area. The channel was designed with southern channel banks at a sufficient height to prevent overflow of the 100-year flood into the golf course, in order to protect the golf course from flood damage. On the north bank, the channel was designed with a maximum slope of 6:1, and peak flows were anticipated to "spread out into the normal floodplain unrestricted on the north side." This engineered channel defines the current condition of the San Dieguito River east of El Camino Real for purposes of the road/bridge project documented in this recirculated EIR. The golf course adjacent to the river channel and near the road is in place.

Impacts to Golf Course Development. In terms of area impacted from the proposed road widening, the Central Alignment, Eastern Alignment, Roundabout, and Lower Elevation alternatives would impact the northwest edge of the golf course. The Road Capacity and Bicycle Safety alternatives would not encroach on the City property line for the golf course, and the Western Alignment Alternative would only encroach slightly, but would not affect golf course features.

For the Central Alignment and Lower Elevation alternatives, the toe of the road embankment slope would extend roughly 69 feet east of the City property line in the northwest corner of the golf course. This incursion would occur for approximately 185 feet south from the southeast corner of the lengthened bridge. The road slope would be west of the constructed toe of the golf course configuration in the northwest corner. The road widening for these alternatives would not affect constructed golf course features. The Eastern Alignment Alternative and Roundabout Alternative would extend as much as 140 feet east of the City property line, with the edge of the permanent road grading limits touching the berm/golf cart path in the northwest corner of the course. The river berm at the new bridge location would be affected by the Eastern Alignment Alternative and Roundabout Alternative, but other golf course features would not be affected, provided the construction easement is narrowed to be adjacent to the toe of the slope in the northwest corner of the golf course.

To reduce impacts to golf course development, during final design of the selected alternative, designers will coordinate with City of San Diego Real Estate Assets and the lessee on repair/restoration of affected facilities. Anticipated work could include replacement of the river berm and riprap blanket, modification of lake boundaries, replacement/realignment of golf cart

path/sewer access path, and modifications to greens/fairways, depending on the alternative selected. Also, in order to obtain property for the project, all land acquisition shall be conducted in accordance with the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended. However, the golf course is on land owned by the City.

3.1.3.9 Issue 5: Consistency with the Multiple Species Conservation Program and the City of San Diego Subarea Plan

A detailed evaluation of project consistency with the MSCP is presented in the NES and is summarized below with additional references to other EIR sections as needed for clarification.

Compliance with the MSCP is necessary to obtain compensation for potentially significant impacts to biological resources caused by the project. The MHPA established within the City boundaries delineates core biological areas and corridors targeted for conservation. Limited development is allowed within the MHPA (City of San Diego 1997). Portions of the project area are situated within the MHPA.

The subarea plan includes one specific MHPA guideline that directly addresses improvements to El Camino Real. It requires that once funding becomes available, a culvert be constructed for wildlife movement where El Camino Real crosses the outlet of Gonzales Canyon into the San Dieguito River. The proposed project area is located north of the portion of El Camino Real that crosses Gonzales Canyon. Consequently, this specific culvert would not be included in the project design.

MSCP Consistency. Additional requirements of the MSCP program that apply to the proposed project are found in Section 1.4 of the City of San Diego subarea plan, which describes acceptable land uses planned or existing adjacent to the MHPA. The proposed road widening and bridge replacement is an essential public facility. According to the Framework Plan for the project area, El Camino Real is designated a four-lane major roadway (City of San Diego 1995). The proposed project would conform to the following land use guidelines provided in the subarea plan and thus would be considered a land use compatible with the goals of the MSCP, with the exception of the Western Alignment Alternative which proposes the storage of materials in the MHPA (see item # 8 below). Where mitigation is required for MSCP conformance, specific measures to be implemented upon project construction are described in detail in Section 3.12. Also, specific measures in standard language required by the City are provided in Section 3.1.5 below. The City of San Diego Biology Guidelines Consistency Summary provided as Appendix H of the NES and summarized above in Section 3.1.3.5 also addresses these guidelines in terms of consistency with City of San Diego Environmentally Sensitive Lands regulations.

The following evaluation of project consistency with the MSCP land use guidelines is based on the NES (ICF/Nordby 2015).

1. Temporary construction areas and roads, staging areas, or permanent access roads must not disturb existing habitat unless determined to be unavoidable. If temporary habitat disturbance is unavoidable, then restoration of, and/or mitigation for, the disturbed area after project completion would be required.

For all phases of construction, staging would occur in previously disturbed areas. Temporary construction fencing and silt fencing would be installed around the perimeter of the staging area for the duration of construction to ensure that habitats adjacent to the project area are not impacted and to contain sediment.

All access related to project construction would be attained through areas that have been previously disturbed or already impacted by project components. Additional access roads would not be necessary.

2. Construction and maintenance activities in wildlife corridors must avoid significant disruption of corridor usage. Training of construction crews and field workers must be conducted.

A minimum of one passageway would be built into the temporary work area within the river channel to allow terrestrial wildlife species, such as light-footed clapper rail, to travel through the work area and allow wildlife to continue to have access to areas upstream and downstream of the work area within the San Dieguito River corridor. Temporary fencing would be installed parallel to the passageway to discourage wildlife from accessing the construction areas. Construction would be restricted during the combined bird nesting season (February 1 to September 30), and construction activities would occur during daylight hours. Temporary construction lighting has not been proposed as part of the project. Training of construction crews and field workers by a qualified biologist would be provided in order to avoid unnecessary impacts to biological resources in the area. Partial disruption to the wildlife corridor would be temporary because construction activities within and over the river would be restricted to the non-breeding season of sensitive bird species and to daylight hours, and the proposed passageways would allow wildlife to continue to move through the area. After completion, the project would not disrupt wildlife movement.

3. Roads in the MHPA will be limited to those identified in Community Plan Circulation Elements, collector streets essential for area circulation, and necessary maintenance/emergency access roads. Local streets should not cross the MHPA except where needed to access isolated development areas.

The project is considered a four-lane major roadway essential for area circulation and, therefore, is compatible with the MSCP. The bridge and road improvements involves widening or replacing the existing road in order to accommodate additional travel lanes and other proposed features. Given that the proposed project is an existing facility and the improvements are considered an essential public facility, the project is an allowed use in the MHPA and therefore consistent with the MSCP.

The existing road is adjacent to the MHPA, and any proposed work involving the bridge/road is proposed in an area that is also adjacent to or slightly within the MHPA. Impacts for the project, including impacts to sensitive areas such as the MHPA which provides habitat for sensitive species, have been avoided and reduced where feasible. Impacts to the MHPA from all build alternatives would be minimal, and impacts are proposed to be fully mitigated in accordance with the MSCP. The level of impacts ranges from less than 0.2 acre for the Eastern Alignment to approximately 1 acre for the Western Alternative. All other alternatives would result in impacts to less than 0.5 acre of the MHPA. This range of impacts represents less than one percent of the preserve established by the MSCP. In addition, the increase provided through mitigation on the restoration site would further offset projected impacts to the MHPA. A portion of the impacts to the MHPA are not as a result of road and bridge construction. Approximately 6.7 acres of the MHPA are within the JPA Mitigation Site, an area that is proposed for restoration and enhancement. This portion of the MHPA is proposed to be restored to a higher function and level of habitat.

4. Where possible, roads within the MHPA should be narrowed from existing design standards to minimize habitat fragmentation and disruption of wildlife movement and breeding areas. Roads must be located in lower quality habitat or disturbed areas to the extent possible.

The proposed project would result in a wider bridge crossing the San Dieguito River. The bridge would be higher than the existing bridge, and would not disrupt wildlife movement through the area.

5. Fencing or other barriers will be used where it is determined to be the best method to achieve conservation goals and adjacent to land uses incompatible with the MHPA. For example, use chain link or cattle wire to direct wildlife to appropriate corridor crossings, natural rocks/boulders or split rail fencing to direct public access to appropriate locations, and chain link to provide added protection of certain special-status species or sensitive habitats (e.g. vernal pools).

At both ends of the widened bridge, fencing would be erected to direct pedestrian and bicycle traffic north and south along the paved road and away from the river bed.

6. *Lighting shall be designed to avoid intrusion into the MHPA and effects on wildlife.*

Permanent lighting in areas of wildlife crossings would consist of low-sodium lighting. Construction activities would only be conducted during daylight hours so that temporary lighting is not necessary. As discussed in EIR Section 2.2.10, continuous street lighting would not be installed. Street lights would be housed with horizontal cut-off and would be shielded downward.

7. Signage will be limited to access and litter control and educational purposes.

Signage erected along the project alignment will be only for the purposes of education, and access and litter control.

8. Prohibit the storage of material (e.g. hazardous or toxic, chemicals, equipment, etc.) within the MHPA and ensure appropriate storage per applicable regulations in any areas that may impact the MHPA, especially due to potential leakage.

Staging would occur in a previously disturbed area that is located outside of the MHPA. For most construction activities, equipment can be removed from the MHPA at the end of each work day. However, it is not practical to remove the crane and the platform needed for some work activities at the end of each work day. For the Western Alignment Alternative, the crane would be kept on the work platform, which would be partially within the MHPA, unless the predicted chance of precipitation is greater than 50 percent for 0.5 inch of rain or greater. For all of the alternatives, secondary containment measures would be installed underneath the crane at the end of each work day. Such measures may include placing a plastic reservoir that extends the width and length of the underside of the crane that has the capacity to contain up to 120 percent the amount of liquid in the crane. As discussed in EIR Section 3.7.3.4, drainage from the completed widened roadway would be routed to bio swales, hydrodynamic separators, or other appropriate permanent BMPs constructed between the widened roadway and the existing or restored open drainage ditch, and these facilities would serve to "treat" runoff prior to the runoff entering the San Dieguito River.

9. Flood control should generally be limited to existing agreements with Resource Agencies unless demonstrated to be needed based on a cost benefit analysis and pursuant to a restoration plan. Floodplains within the MHPA, and upstream from the MHPA if feasible, should remain in a natural condition and configuration in order to allow for ecological, geological, hydrological and other natural processes to remain or be restored.

The proposed project would not create the need for flood control measures. No increase in flood elevations over the predicted 100-year water surface elevation is anticipated.

10. No berming, channelization, or man-made constraints or barriers to creek, tributary, or river flows should be allowed in any floodplain within the MHPA unless reviewed by all appropriate agencies, and adequately mitigated.

Stabilization of the north bank of the San Dieguito River would be accomplished through methods involving placing buried rip rap in an excavated bank separated from the existing habitat line so that wetlands would not be disturbed by the construction. No human-made constraints to the flows associated with the San Dieguito River would be implemented. The vegetated, protective berm constructed to prevent sedimentation in the planted coastal freshwater marsh wetlands mitigation area would be located outside of the river. The mitigation area would not affect river flows or sedimentation patterns.

11. No riprap, concrete, or other unnatural material shall be used to stabilize river, creek, tributary, and channel banks within the MHPA. River, stream, and channel banks shall be natural, and stabilized where necessary with willows and other appropriate native plantings. Rock gabions may be used where necessary to dissipate flows and should incorporate design features to ensure wildlife movement.

Riprap would be used under the proposed bridge because these areas would be too steep to vegetate naturally. The bridge abutments would be at a slope of 1.5:1 in order to avoid increasing 100-year flood elevations upstream from the new bridge and roadway raised on embankment across the floodplain. Open stabilization materials could not be effectively planted due to the steep slope and shading from the new bridge. It has been determined that most 100-year flood velocities with the proposed project would be approximately the same as predicted for existing conditions. However, upstream of the proposed bridge, 100-year velocities would be higher. Therefore, the buried stabilization discussed in item #10 above is proposed. With the exception of bank stabilization described in item #10 above, additional channel stabilization would not be included as part of the proposed project. Section 3.7 of this recirculated EIR discusses this issue in detail.

MHPA Adjacency Guidelines Consistency. Because most of the alignment is located outside of the MHPA, the following land use adjacency guidelines also apply to the proposed project. These guidelines address drainage, lighting, noise, invasives, and grading/land development implications and are discussed below.

1. All new proposed parking lots and developed areas in and adjacent to the preserve must not drain directly into the MHPA. All developed and paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials, and other elements that might degrade or harm the natural environment or ecosystem processes within the MHPA. This can be accomplished using a variety of methods including natural detention basins, grass swales or mechanical trapping devices. These systems should be maintained approximately once a year or as often as needed, to ensure proper functioning.

The new alignment for El Camino Real would be designed so that it does not drain directly into the MHPA.

2. Lighting of developed areas should be directed away from the MHPA. When necessary, lighting system should be shielded with non-invasive plant materials, berming, and/or other methods to protect the MHPA and special-status species from night lighting.

Permanent lighting associated with the proposed road and bridge widening would be directed down and away from the MHPA and, in areas of wildlife crossings, would consist of low-sodium lighting. Construction activities would only be conducted during daylight hours so that temporary lighting is not necessary.

3. Uses in or adjacent to the MHPA should be designed to minimize noise impacts. Berms or walls should be constructed adjacent to commercial areas, recreational areas and any other use that may introduce noises that could impact or interfere with wildlife utilization of the MHPA.

The proposed project would not generate traffic, and would not create new uses in or adjacent to the MHPA that would generate noise. The widened roadway would reduce congestion along the existing road and allow for greater vehicle speeds. However, due to the presence of federal and state endangered least Bell's vireo and light-footed clapper rail, mitigation would be proposed to offset indirect impacts to these species from construction and operational noise. Construction would be restricted during the nesting season (February 1 to September 30).

Outside of the nesting season, construction activities would occur during daylight hours such that wildlife use of the San Dieguito River corridor may continue to some extent. Training of construction crews and field workers by a qualified biologist would be provided in order to avoid unnecessary impacts to biological resources in the area.

4. No invasive nonnative plant species shall be introduced into areas adjacent to the MHPA (City of San Diego 1997).

Any proposed landscaping associated with the final project design would utilize native plant species. Proposed planting palettes would only include native species. No nonnative species would be introduced into the project area or the MHPA. To ensure the project does not promote the introduction of invasive species to the surrounding undeveloped areas, construction equipment would be cleaned of mud or other debris that may contain invasive plants and/or seeds and would be inspected to reduce the potential of spreading noxious weeds before mobilizing to the site and before leaving the site, during the course of construction. Also, trucks with loads carrying vegetation would be covered, and vegetation materials removed from the site would be disposed of in accordance with applicable laws and regulations. Exotic species removed during construction would be properly handled to prevent sprouting or regrowth.

Barriers, such as white, wood-faced fencing would be provided along the newly constructed road and bridge to direct the public and associated domestic animals away from the MHPA.

6. *Manufactured slopes associated with site development shall be included within the development footprint for projects within or adjacent to the MHPA.*

All manufactured slopes associated with the proposed road and bridge are considered direct and permanent project impacts. These areas of impact have been quantified in the NES and Section 3.12 of this recirculated EIR.

In addition to MHPA guidelines developed for the Northern Area, land use considerations, and land use adjacency guidelines, the project also conforms to the framework Management Plan presented in Section 1.5 of the MSCP subarea plan. The plan provides general goals for habitat management within the MHPA:

- 1. To ensure the long-term viability and sustainability of native ecosystem function and natural processes throughout the MHPA.
- 2. To protect the existing and restored biological resources from intense or disturbing activities within and adjacent to the MHPA while accommodating compatible public recreational uses.
- 3. To enhance and restore, where feasible, the full range of native plant associations in strategic locations and functional wildlife connections to adjoining habitat in order to provide viable wildlife and sensitive species habitat.
- 4. To facilitate monitoring of selected target species, habitats, and linkages in order to ensure long-term persistence of viable populations of priority plant and animal species and to ensure functional habitats and linkages.

The proposed project alternatives conform to these goals through the implementation of measures, described in Chapter 4 of the NES and Section 3.12 of this recirculated EIR. The Project is also required to incorporate measures consistent with the City's MHPA Land Use Adjacency Guidelines. Where impacts are unavoidable, compensatory mitigation in the form of habitat creation, restoration, and enhancement has been proposed. Implementation of mitigation measures specified in Section 3.12 of this recirculated EIR would ensure that existing and restored biological resources in the area are protected while accommodating the widening of El Camino Real, a compatible public roadway, as well as recreational uses such as pedestrian and bicycle pathways and equestrian trails.

In order to facilitate the management goal of providing viable wildlife and sensitive species habitat, mitigation proposed for the project would be accomplished primarily on the JPA Mitigation Site. This area would be used to create or enhance approximately 20.4 acres of native habitat that would contribute to the use of the San Dieguito River as a functional wildlife corridor.

The consideration of multiple alternatives for the proposed project allows for the selection of the most ecologically feasible project design. In addition, measures such as restricted construction schedules and noise attenuation barriers facilitate the avoidance of direct impacts and minimization of indirect impacts to special-status species such as light-footed clapper rail and

least Bell's vireo. In this way, the proposed project facilitates the monitoring of selected target species and habitats and promotes the long-term persistence of special-status species in the area.

Additional general management directives are presented in Section 1.5.2 of the MSCP subarea plan. These are general management guidelines that apply to all parts of the City of San Diego MSCP subarea, as appropriate. Topics addressed by these guidelines include but are not limited to: litter/trash and materials storage, adjacency management issues, invasive exotics control and removal, and flood control. Applicable guidelines have been addressed previously through the design of multiple project alternatives developed to avoid and minimize impacts to sensitive habitats. The management guidelines also have been indirectly addressed in the discussion of project conformance with the MSCP, the City's Environmentally Sensitive Lands regulations in the Biology Guidelines, and proposed mitigation for biological resources impacts in Section 3.12. Project-specific management activities on site would need to be included in the mitigation and monitoring plan. None of the Northern area specific management directives apply to the proposed project. Consistent with MSCP and Biology Guidelines, Note C17 on the Future Urbanizing Area, project areas, the JPA Mitigation Site, and the additional offsite mitigation area are considered open space and MHPA are proposed to be restored where possible to natural habitats.

Issue 5 Conclusions. The proposed road widening and bridge replacement is an essential public facility in the alignment specified in approved policy and community planning documents for the area. All alternatives of the project would conform to applicable provisions of the MSCP and implementing regulations. Measures to conform to the City's City's MHPA Land Use Adjacency Guidelines are also required to be included in the project's final plans which would further avoid or minimize impacts to native ecosystems.

3.1.3.10 No Build Alternative

Under the No Build Alternative, none of the project components that could disturb existing or proposed land uses would be constructed. Impacts to properties that are currently vacant, planned for development, being developed, or already developed would not occur. However, by not widening El Camino Real, the roadway would remain inconsistent with the NCFUA Framework Plan, and no elements of the JPA San Dieguito River Park would be facilitated by certain alternatives for the proposed El Camino Real Bridge/Road Widening Project.

3.1.4 Significance of Land Use Impacts under CEQA

3.1.4.1 CEQA Significance Thresholds

The alternatives were analyzed and for the issues required to be addressed per the list in Section 3.1.3. The City of San Diego Significance Determination Thresholds (City of San Diego 2011) provides the following thresholds for what may be considered significant impacts for the land use issues addressed:

Compatibility with Planning Documents:

- If the project created an inconsistency/conflict with the environmental goals, objectives, or guidelines of a community or general plan.
- If the project created a substantial incompatibility with an adopted plan.

Compatibility with Existing Land Uses and Future Projects:

- If the project created an inconsistency/conflict with an adopted land use designation or intensity and indirect or secondary environmental impacts occur.
- If the project created a development or conversion of general plan or community plan designated open space or prime farmland to a more intensive land use.

Conflict with Environmental Plans or Policies

• If the project created an inconsistency/conflict with adopted environmental plans for an area.

Conflicts with Environmentally Sensitive Lands Regulations of the Land Development Code

• If the project significantly increased the base flood elevation for upstream properties, or constructed in a Special Flood Hazard Area (SFHA) or floodplain/wetland buffer zone.

Effects on Existing and Planned Recreational Facilities

• If the project created an inconsistency/conflict with an adopted land use designation or intensity and indirect or secondary environmental impacts occur.

Consistency with the MSCP and City of San Diego Subarea Plan

• If the project created an inconsistency/conflict with adopted environmental plans for an area.

Floodplain Development

If the project significantly increased the base flood elevation for upstream properties, or constructed in a SFHA or floodplain/wetland buffer zone.

The overall threshold relevant for the issues required to be addressed in this section is the note in the thresholds that an inconsistency with a plan is not necessarily a significant environmental impact; the inconsistency would have to relate to an environmental issue to be considered significant under CEQA.

3.1.4.2 Determination of Significance under CEQA

The conclusions of significance under CEQA for the alternatives analyzed and for the issues required to be addressed per the list in Section 3.1.3 are summarized in Table 3.1-11 and discussed below.

Compatibility with Planning Documents. For impacts associated with planning document compatibility, the Central Alignment, Western Alignment, Eastern Alignment, Roundabout, and Lower Elevation alternatives are generally consistent with the approved planning documents for the area. The inconsistencies of the Road Capacity and Bicycle Safety alternatives with planning documents relate to these alternatives not providing certain features planned in the various planning documents, such as four travel lanes, bike lanes, and pedestrian walkways. These inconsistencies would not generate environmental impacts because the proposed conditions

would not be substantially different from existing conditions. No significant impacts from inconsistencies with approved planning documents would occur.

Compatibility with Existing Land Uses and Future Projects. Each of the alternatives would affect existing land uses and development in the project area in various ways and to different degrees depending on the alternative. However, in order to obtain property for the project, all land acquisition must be conducted in accordance with the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended and with City acquisition policies. There are no established educational, religious, or scientific uses that are close enough to be affected by the project. The project would not change land use designations or intensity of use. The project would not convert designated open space or prime farmland to a more intensive use. No significant environmental impacts from incompatibilities with existing land uses would occur. None of the alternatives would interfere with the ability of proposed future projects to develop as planned. No significant impacts to future projects would occur.

Conflicts with Environmental Plans or Policies. The proposed project would not have inconsistencies or conflicts with the JPA's plans and policies. No significant impacts to environmental plans or policies would occur.

Conflicts with ESL Regulations. As indicated in Table 3.1-7, the project would be consistent with General Development Regulations for all Environmentally Sensitive Lands through obtaining a Site Development Permit. The project would be consistent with Development Regulations for Sensitive Biological Resources through ongoing coordination with permitting agencies, and development of a mitigation concept to achieve no-net-loss of wetlands, among other project activities. The project also would be consistent with Development Regulations for Special Flood Hazard Areas. The project would not raise the base flood elevation for upstream properties, or construct an unacceptable facility in regulated zones. Detailed findings of approval will be required prior to the public hearing for the project. A preliminary assessment of consistency with findings for wetland deviations is presented in Table 3.1-7. All findings can be made except that none of the alternatives with the cantilever fencing would satisfy Section 126.0708(a)(1) because public views to the ocean for drivers would be blocked by the cantilever fencing. This impact is discussed in more detail in Section 3.3 of this recirculated EIR. No significant impacts under the ESL Regulations would occur.

Effects on Existing and Planned Recreational Facilities. Impacts to the recreational properties of Horsepark, Polo Club fields, and the Fairbanks Ranch Golf Course would vary with the different build alternatives. During design of the selected alternative, designers will coordinate with owner/operators to reduce impacts, and all land acquisition must be conducted in accordance with the Federal Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended and with City acquisition policies. The project would not cause long-term inconsistencies or conflicts with the recreational operations that would invalidate the adopted land use designation or cause environmental impacts. No significant impacts to recreational facilities would occur.

Consistency with the MSCP and City of San Diego Subarea Plan. All of the build alternatives would be consistent with the MSCP. To preclude indirect impacts to the adjacent MHPA, the project would require implementation of applicable measures from the City's MHPA Land Use Adjacency Guidelines. In order to assist City staff in determining that these impact-avoiding measures have been included in the project's final plans, verification by a qualified biologist would be required. This verification has been included in the mitigation measure provided in Section 3.1.5 below.

Impact	Threshold	Central	Road	Bicycle	Western	Eastern	Round	Lower	No
			Capacity	Safety			-about	Elevation	Build
Compatibility with Planning	Inconsistency that results in	NS	NS	NS	NS	NS	NS	NS	NS
Documents	environmental impacts								
Compatibility with Existing	Inconsistency that results in	NS	NS	NS	NS	NS	NS	NS	NS
Land Uses and Future Projects	environmental impacts								
Conflict with Environmental	Inconsistency that results in	NS	NS	NS	NS	NS	NS	NS	NS
Plans or Policies	environmental impacts								
Conflicts with ESL Regulations	Conflict with the provisions,	NS	NS	NS	NS	NS	NS	NS	NS
	including no net loss of								
	wetlands and no increase in								
	the base flood elevation								
Effects on existing and planned	Inconsistency/conflict that	NS	NS	NS	NS	NS	NS	NS	NS
recreational facilities	results in environmental								
	impacts								
Consistency with MSCP	Inconsistency /conflict with	SM	SM	SM	SM	SM	SM	SM	NS
	adopted environmental								
	plans for the area that								
	results in environmental								
	impacts								

Table 3.1-11 Summary of CEQA Significance for Land Use Impacts

NS = Not significant SM = Significant and mitigable to below a level of significance SU = Significant and unmitigable

Floodplain Development. This issue is evaluated in Section 3.7: Hydrology/Water Quality, which presents analysis demonstrating that none of the build alternatives would increase 100-year water surface elevations on other properties. The project would be built within the 100-year floodplain, but this is so that the new bridge would be above the 100-year flood level and so the road would be raised on fill above the 100-year flood level.

3.1.5 Mitigation Measures

To preclude indirect impacts to the adjacent MHPA, the project would incorporate mitigation measures consistent with the City's MHPA Land Use Adjacency Guidelines. No mitigation measures are necessary for any of the build alternatives. Therefore, the following specific measures are required by the City for projects located within and/or adjacent to the MHPA. These measures are to be used in addition to Biological Resource Protection During Construction MMRP and with the direct habitat impact and species specific mitigation requirements specified in Section 3.12 of this recirculated EIR.

Lan-1 The following measures shall be implemented as required by the City:

I. Prior to issuance of any construction permit or notice to proceed, DSD/ LDR, and/or MSCP staff shall verify the Applicant has accurately represented the project's design in or on the Construction Documents (CD's/CD's consist of Construction Plan Sets for Private Projects and Contract Specifications for Public Projects) are in conformance with the associated discretionary permit conditions and Exhibit "A", and also the City's Multi-Species Conservation Program (MSCP) Multi-Habitat Planning Area (MHPA) Land Use Adjacency Guidelines. The applicant shall provide an implementing plan and include references on/in CD's of the following:

> A. **Grading/Land Development/MHPA Boundaries** - MHPA boundaries onsite and adjacent properties shall be delineated on the CDs. DSD Planning and/or MSCP staff shall ensure that all grading is included within the approved development/construction footprint, specifically manufactured slopes, disturbance, and development within or adjacent to the MHPA. For projects within or adjacent to the MHPA, all manufactured slopes associated with site development shall be included within the development footprint.

> B. **Drainage** - All new and proposed parking lots, staging areas, and developed areas in and adjacent to the MHPA shall be designed so they do not drain directly into the MHPA. All staging and developed/paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials prior to release by incorporating the use of filtration devices, planted swales and/or planted detention/desiltation basins, or other approved temporary and permanent methods that are designed to minimize negative impacts, such as excessive water and toxins into the ecosystems of the MHPA.

C. **Toxics/Project Staging Areas/Equipment Storage** - Projects that use chemicals or generate by-products such as pesticides, herbicides, and animal waste, and other substances that are potentially toxic or impactive to native habitats/flora/fauna (including water) shall incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA. No trash, oil, parking, or other construction/development-related material/activities shall be allowed outside any approved construction limits.

Provide a note in/on the CD's that states: "All construction related activity that may have potential for leakage or intrusion shall be monitored by the Qualified Biologist/Owners Representative or Resident Engineer to ensure there is no impact to the MHPA."

D. **Lighting** - Lighting within or adjacent to the MHPA shall be directed away/shielded from the MHPA, or limited to the immediate area and be subject to City Outdoor Lighting Regulations per LDC Section 142.0740.

E. **Barriers** - Construction and new development within or adjacent to the MHPA shall be required to provide barriers (e.g., non-invasive vegetation; rocks/boulders; 6-foot high, vinyl-coated chain link or equivalent fences/walls; and/or signage) along the MHPA boundaries to direct public access to appropriate locations, reduce domestic animal predation, protect wildlife in the preserve, and provide adequate noise reduction where needed.

F. **Invasives-** No invasive non-native plant species shall be introduced into areas within or adjacent to the MHPA.

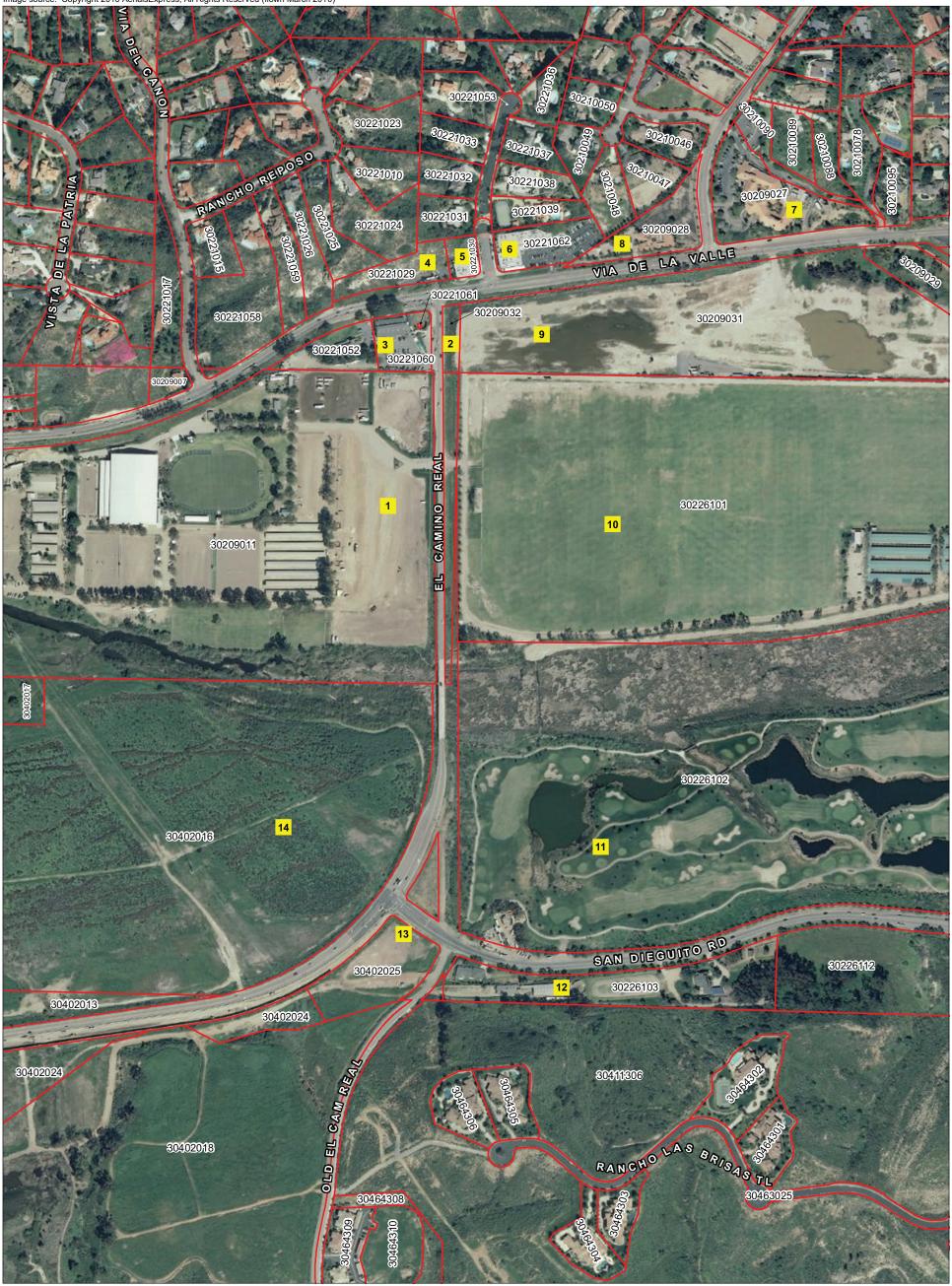
G. Noise - Due to the site's location adjacent to or within the MHPA where the Qualified Biologist has identified potential nesting habitat for listed avian species, construction noise that exceeds the maximum levels allowed shall be avoided during the breeding seasons for the following: Least Bell's vireo (3/15-9/15). If construction is proposed during the breeding season for the species, USFWS protocol surveys shall be required in order to determine species presence/absence. If protocol surveys are not conducted in suitable habitat during the breeding season for the aforementioned listed species, presence shall be assumed with implementation of noise attenuation and biological monitoring.

When applicable (i.e., habitat is occupied or if presence of the covered species is assumed), adequate noise reduction measures shall be incorporated. These measures are provided in Section 3.12 of this recirculated EIR (see Mitigation Measures Bio-10 and Bio-13). In addition, habitat-based mitigation shall also be implemented for impacts to occupied least Bell's vireo habitat (see Mitigation Measures Bio-10 and Bio-13).

3.1.6 Significant and Unmitigable Impacts under CEQA

Implementation of the above measures would mitigate all CEQA impacts to below a level of significance.

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- **Property Boundaries**
- 30221017 Assessor Parcel Number
- Potential Impact Footprint (PIF) Number
 (See Table 3.1.1)

(See Table 3.1-1)



El Camino Real

Road/Bridge Widening

Potential Affected Parcels in the Study Area

Figure

3.1-1



- **(7)** Evangelical Formosan Church (Completed)
- (8) El Camino Real Southern Segment Widening (Completed)
- (9) Via del la Valle Western Segment Widening
- (10) San Dieguito Lagoon Wetlands Restoration Project (Completed)
 - Widened Roadway



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El Camino Real

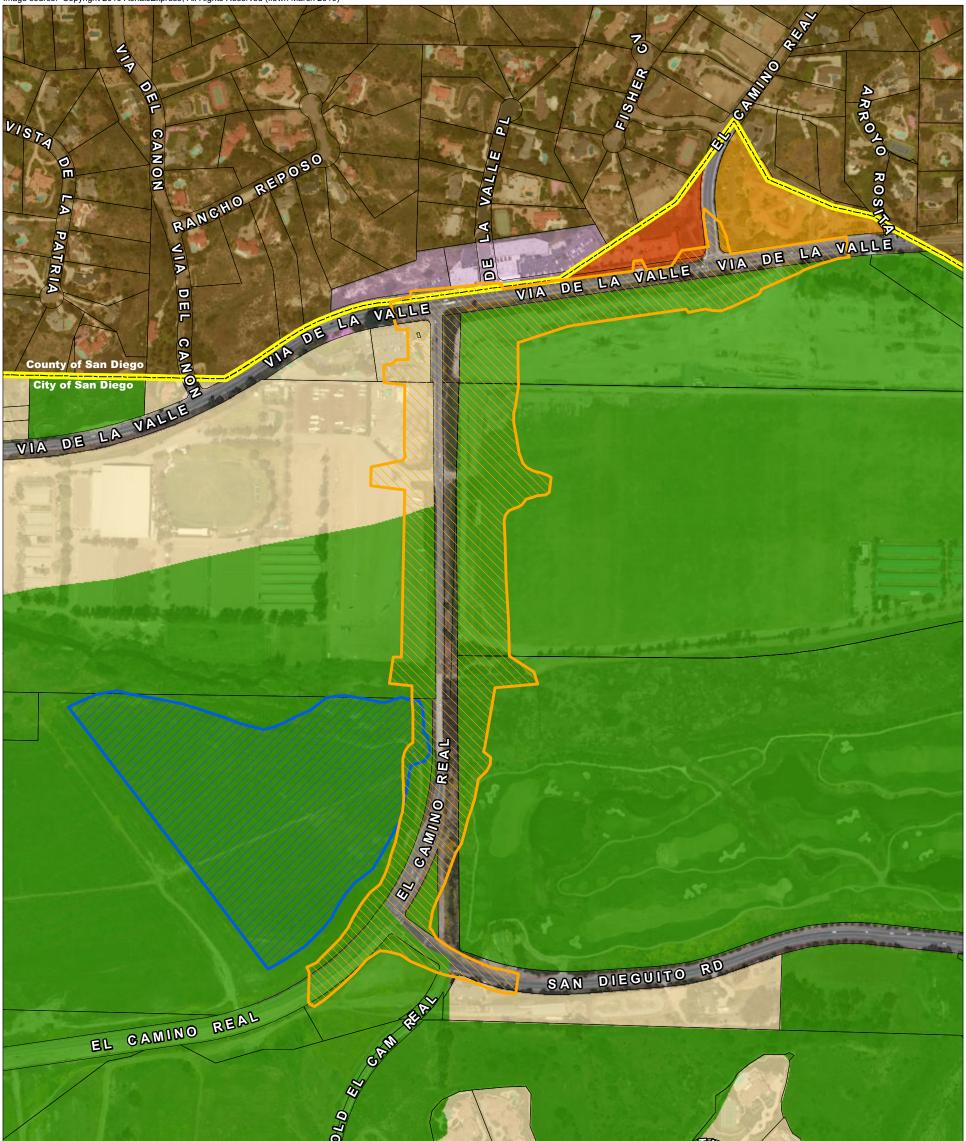
Road/Bridge Widening

Proposed Projects in the Vicinity (2012) and Projects Completed Since 2006 Draft EIR

Figure

3.1-2



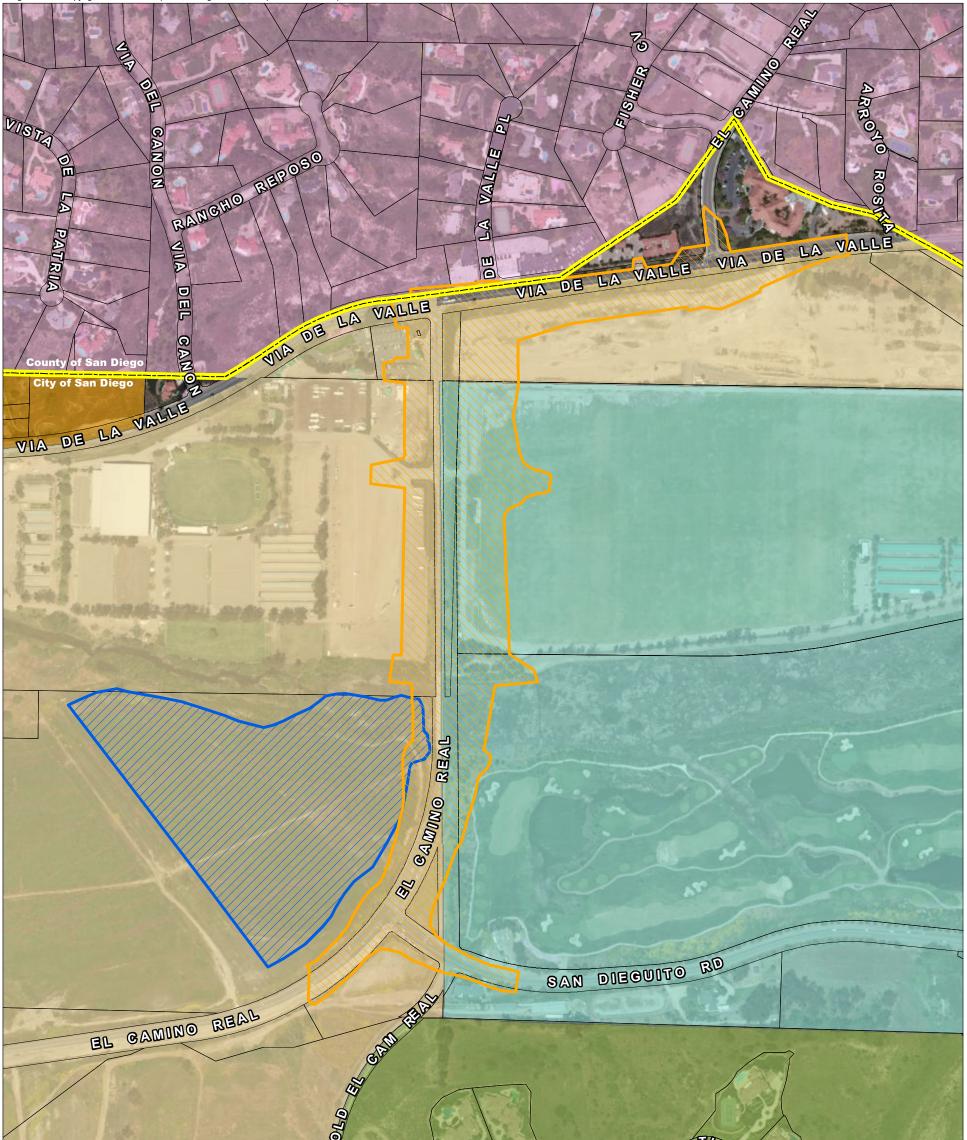






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Area of Potential Effect from Road/Bridge Construction

Area of Potential Effect from Proposed Wetland Mitigation Concept, (see Section 3.12) **City - County Line**



Fairbanks Ranch Country Club

NCFUA Subarea II

- **Pacific Highlands Ranch**
- San Dieguito
- Via de la Valle

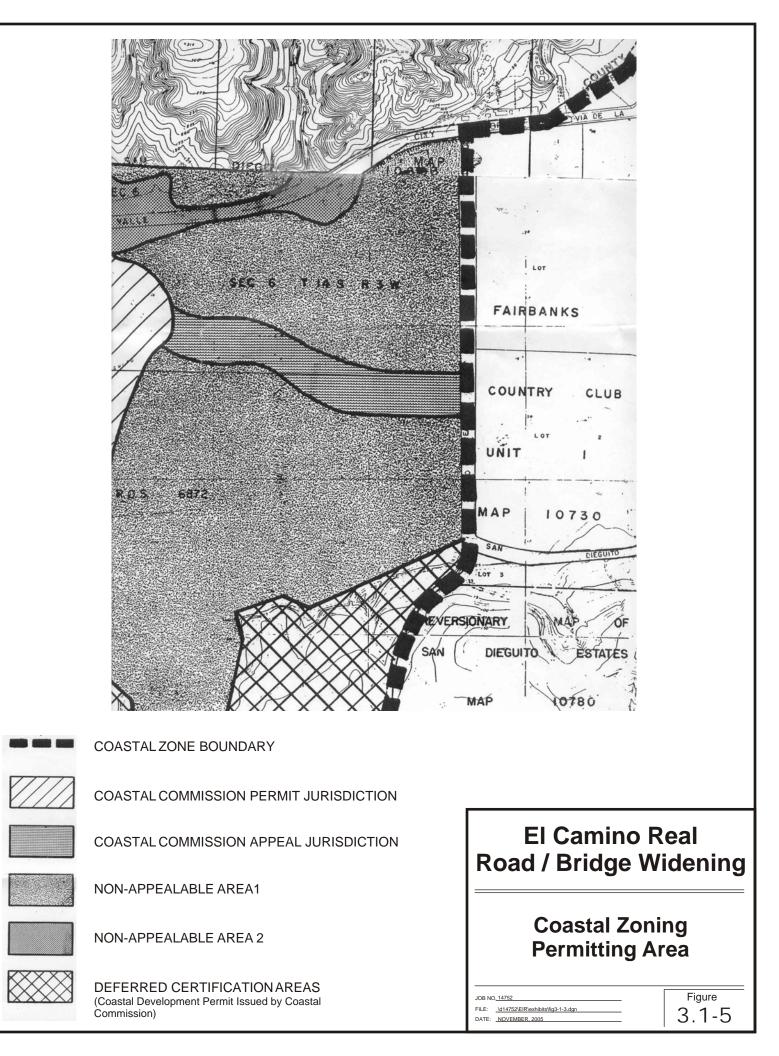
Road/Bridge Widening

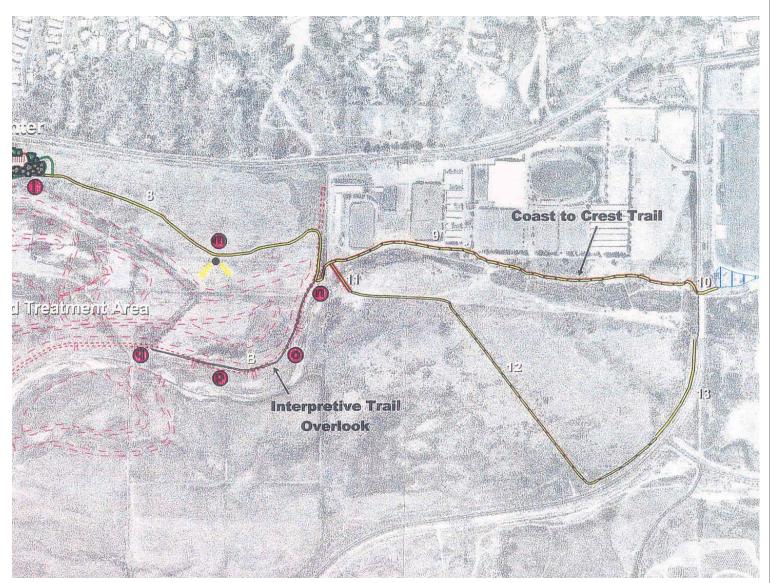
Surrounding Communities

Figure



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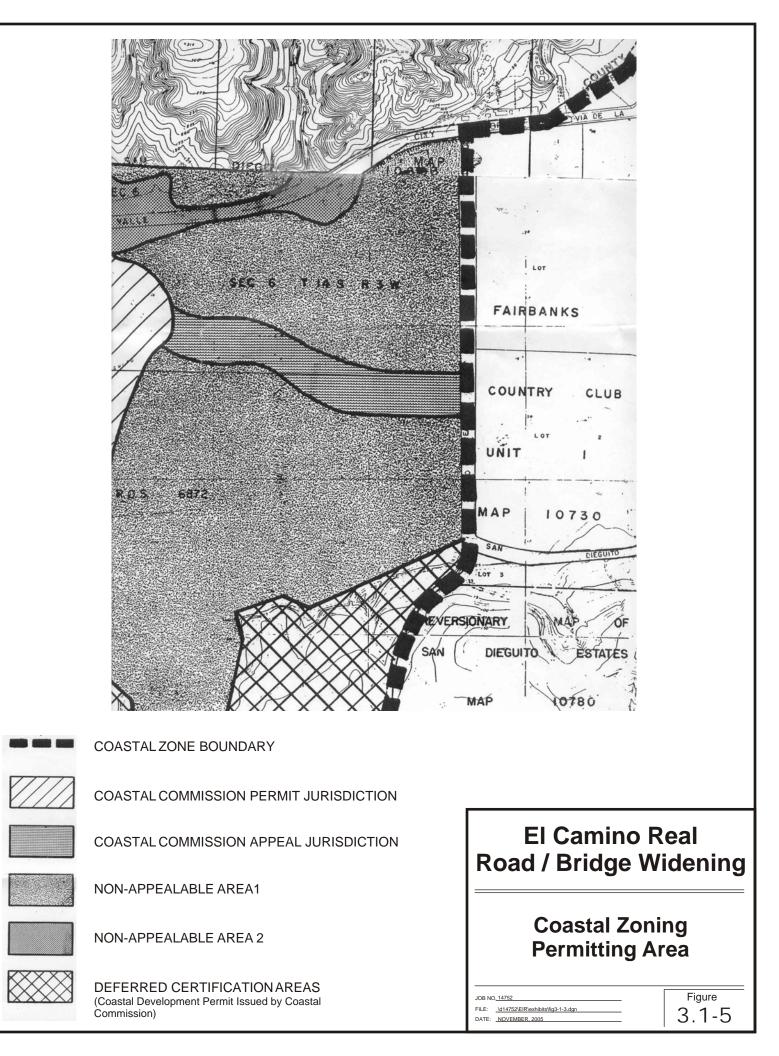


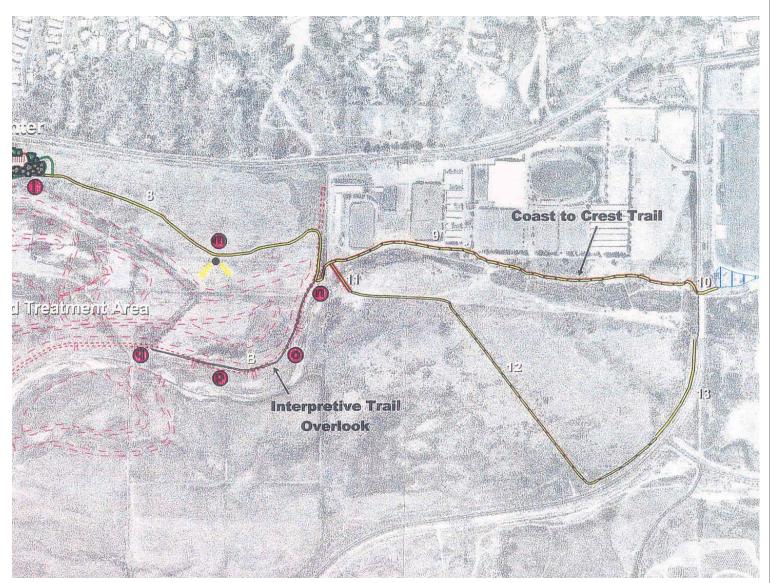
Source: San Dieguito River Park JPA, 2000

El Camino Real Road / Bridge Widening

JPA Proposed Trails

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DATE:	NOVEMBER, 2005	J.I-0





Source: San Dieguito River Park JPA, 2000

El Camino Real Road / Bridge Widening

JPA Proposed Trails

JOB NO	14752	Figure
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DATE:	NOVEMBER, 2005	J.I-0

3.2 TRAFFIC/CIRCULATION

This section evaluates the impacts of the proposed project on traffic and parking in the study area. This section is based on the Transportation Analysis for the El Camino Real Road and Bridge Widening Project (Urban Systems Associates 2012). This separate technical report is incorporated into this EIR by reference, and is available for inspection at the City of San Diego.

The long-term traffic conditions were projected to 2035 to reflect local "buildout" conditions.

In general, transportation facilities in a given area include roadways, from freeways to residential streets, each of which has a defined configuration in terms of the number of lanes, striping, and type and width of median. Roadway intersections may be signalized or unsignalized. Intersections also have varying geometrics in terms of number and function of lanes (i.e., different combinations of right-turn, left-turn and through lanes). Transportation facilities may include separate and on-street bicycle lanes, and mass transit facilities such as trolley lines and bus routes. Pedestrian facilities (sidewalks and trails) are also considered part of a transportation system.

3.2.1 Regulatory Setting

Traffic conditions and transportation planning in San Diego County are guided by state, regional, and local agencies and their policies. Caltrans is responsible for enhancement and maintenance of state highways and interstate freeways. Any changes to state facilities or construction within state right of way requires an encroachment permit from Caltrans. Regional transportation planning efforts are guided by the traffic forecasting models run by SANDAG. This agency provided long-range (2035) modeling of traffic volume projections for this document. The Series 12 Regional Growth Forecast applied in SANDAG modeling is a direct reflection of policies contained in local General and Community Plans. Locally, each incorporated city, including the City and County of San Diego, have developed specific goals and policies for traffic conditions and roadways within their jurisdiction. Each agency is responsible for the implementation of these goals and policies. The Mobility Element of the City 2008 General Plan defines the policies regarding traffic flow and transportation facility design. Conformance of the project with the General Plan and other relevant planning documents was discussed in Section 3.1 (Land Use).

3.2.2 Affected Environment

The transportation environment within the traffic study area is defined in terms of specific parameters, discussed below. The traffic study area encompasses El Camino Real from Via de la Valle south to San Dieguito Road, and Via de la Valle from just west of El Camino Real to just east of El Camino Real North.

The volume of traffic combined with the configuration of a particular roadway segment or intersection determines the LOS, a reflection of how smoothly vehicles can traverse the segment or pass through the intersection. The six classifications of LOS, from A (free traffic flow) to F (gridlock), are defined and illustrated in Table 3.2-1. LOS is analyzed differently for street segments and intersections. Traffic volume is a key parameter for both analyses. The volume of traffic can be expressed in terms of average daily traffic (ADT) and peak hour.

A	В	С	F

Table 3.2-1Level of Service Definitions

Α	Highest quality of service. Free traffic flow, low volumes and densities. Little or no
	restrictions on maneuverability or speed. No delay.
В	Stable traffic flow, speed becoming slightly restricted. Low restriction on
	maneuverability. No delay.
С	Stable traffic flow, but less freedom to select speed, change lanes, or pass. Density
	increasing. Minimal delay.
D	Speeds tolerable but subject to sudden and considerable variation. Minimal delay.
Е	Unstable traffic flow with rapidly fluctuating speeds and flow rates. Short headways,
	low maneuverability, and low driver comfort. Substantial delay.
F	Forced traffic flow. Speed and flow may drop to zero with high densities.
	Considerable delay.

3.2.2.1 Existing Street Geometrics/Traffic Control Devices

Under existing (2003) conditions (updated 2012), El Camino Real generally has one 11-foot-wide lane in each direction separated by a double yellow stripe with no shoulder or pedestrian walkway. At the southern end of the project, near San Dieguito Road, southbound El Camino Real widens to accommodate two through lanes and a left-turn lane onto eastbound San Dieguito Road. Approaching Via de la Valle on El Camino Real northbound, there is a right-turn lane to eastbound Via de la Valle, and a left through lane. Figure 3.2-1 shows the existing lane configurations for the intersections in the vicinity of the project, which are discussed in more detail in Section 3.2.2.3.

The intersection with Via de la Valle at the north end of the project, and the intersection with San Dieguito Road at the south end of the project are signalized.

All of the street segments in the project area consist of two travel lanes (one lane in each direction). El Camino Real south of San Dieguito Road has been widened to four travel lanes (two lanes in each direction).

3.2.2.2 Existing Traffic Volumes and Levels of Service

Traffic volumes for the 2006 Draft EIR were obtained by counts conducted in July 2003. Traffic counts for this recirculated EIR were obtained on November 3, 2011, for roadway segments, and November 8, 2011, for intersections. The counts incorporate an event that occurred at the polo fields and resulted in more than 550 cars exiting right from the fields and traveling north on El Camino Real toward Via de la Valle. Therefore, the traffic count and projections derived from the volumes are considered conservative. The project traffic study (Urban Systems Associates

2012) includes the actual daily and peak hour intersection count data obtained in 2011 for the project. Existing average daily traffic in the project area is shown on Figure 3.2-2.

Road Segments. Existing traffic volumes and LOS for the various street segments studied are listed in Table 3.2-2. Except for El Camino Real North and El Camino Real south of San Dieguito Road, all of the road segments in the project area operate at LOS F. During special events, traffic volumes temporarily increase above these baseline conditions. Special events in the area include events at the Del Mar Fairgrounds such as the San Diego County Fair, when overflow parking is provided at Horsepark; horse racing at the Del Mar Fairgrounds, equestrian events at Horsepark; and polo matches, Surf Cup soccer events, and other activities at the Polo Club fields. To the extent that the polo field event on November 3, 2011 (when the traffic counts were obtained) was typical of such events, the existing and projected traffic volumes incorporate special event conditions at that location.

Intersections. Figure 3.2-3 shows the existing A.M. and P.M. peak traffic volumes at the main intersections in the vicinity of the proposed project. Existing intersection levels of service are presented in Table 3.2-3. All signalized intersections operate at LOS D or better; however, unsignalized El Camino Real at the Horsepark/Polo Club driveways operates at acceptable LOS D in the A.M. peak and unacceptable LOS F in the P.M. peak. Unsignalized Old El Camino Real at San Dieguito Road currently operates at acceptable LOS D in the A.M. peak and LOS C in the P.M. peak.

Street	Segment	Lanes	Street Class.	ADT	Capacity at LOS E	V/C	LOS
Via de la Valle	West of El Camino Real	2	2-C	22,904	10,000	2.29	F
	El Camino Real / El Camino Real N	2	2-C	16,011	10,000	1.60	F
	East of El Camino Real N	2	2-C	13,149	10,000	1.31	F
El Camino Real North	North of Via de la Valle	2	2-C	3,664	10,000	0.37	А
El Camino Real	'amino Real Via de la Valle/ San Dieguito Road		2-C	14,559	10,000	1.46	F
	South of San Dieguito Road	4	4-M	13,902	40,000	0.35	А
San Dieguito Road	El Camino Real / Old El Camino Real	2	2-C	14,564	10,000	1.46	F

Table 3.2-2Existing Street Segment Levels of Service

Source: Urban Systems Associates 2012

2-C = 2-lane collector 4-M = 4-lane Major

LOS in **bold** indicates unacceptable conditions

	A.M. Peak Hour		P.M. Pea	k Hour
Intersection	Delay (sec)	LOS	Delay (sec)	LOS
Via de la Valle at El Camino Real	46.9	D	39.9	D
Via de la Valle at El Camino Real North	12.1	В	11.3	В
El Camino Real at San Dieguito Road	14.6	В	20.3	С
El Camino Real at Horsepark/Polo Grounds*	28.8	D	53.6	F
Old El Camino Real at San Dieguito Road*	26.2	D	24.1	С

Table 3.2-3Existing Intersection Levels of Service

Source: Urban Systems Associates 2012

* = Two-Way Stop Control

LOS in **bold** indicates unacceptable conditions

3.2.2.3 Existing Traffic Patterns

Approaching Via de la Valle on El Camino Real northbound, there are two lanes that accommodate right-turns to eastbound Via de la Valle, left-turns to westbound Via de la Valle, and through movements. The signal controls the four-way intersection, where the north leg is a two-way driveway of a parking lot for a professional office complex that includes a restaurant. A second entrance/exit for the office parking lot is located on Via de la Valle approximately 110 feet west of the driveway. Left- and right-turn movements are possible from both driveways. Approaching El Camino Real eastbound on Via de la Valle, there is a left-turn pocket to the office/restaurant parking lot, a through lane, and a right-turn lane to southbound El Camino Real. Approaching El Camino Real westbound on Via de la Valle, there is a left-turn pocket to southbound El Camino Real, and a through/right-turn lane. Pedestrian crosswalks are marked on the east, west, and north sides of the intersection.

Along Via de la Valle from El Camino Real to El Camino Real North, there are left-turn pockets for eastbound traffic to turn into the businesses along the north side of Via de la Valle. The pockets are at De la Valle Place, the Polo Plaza parking lot, the Gatlin Development Company commercial development (Villa Paraiso), and at the intersection with El Camino Real North.

At the southern end of the project, the existing intersection of El Camino Real and San Dieguito Road is wider than the two-lane road segment configuration. Approaching San Dieguito Road on southbound El Camino Real, there is one left-turn lane to eastbound San Dieguito Road, and two through lanes. The signal controls traffic at this three-way intersection. There is currently no west leg. Approaching San Dieguito Road on northbound El Camino Real, there are two lanes for through travel, (a right turn can be made from the far right lane onto eastbound San Dieguito Road, there are two left-turn lane. Approaching El Camino Real from westbound San Dieguito Road, there are two left-turn lanes and a right-turn lane. Pedestrian crosswalks are marked on the north and east sides of the intersection.

3.2.2.4 Existing Pedestrian and Bicycle Facilities

There are currently no pedestrian sidewalks or bike lanes on the segment of El Camino Real from San Dieguito Road to Via de la Valle. A bike lane on the west side of El Camino Real extending southward begins on the south side of the intersection with San Dieguito Road.

3.2.2.5 Existing Parking

There is no on-street parking allowed on El Camino Real or Via de la Valle in the traffic study area. Parking in the study area exists in the parking lots north of Via de la Valle that serve the restaurant and commercial offices, in the upper and lower parking lots for Mary's Tack and Feed, and in the parking lot for the pet hospital west of Mary's Tack and Feed. The privately owned, currently undeveloped parcel south of Via de la Valle and east of El Camino Real is occasionally used for parking.

In addition, the 2000 Master Plan for the 22nd District Agricultural Association indicates that on the Horsepark property, the dirt lot south of the entrance and fronting El Camino Real, which measures approximately 600 feet long by 240 feet wide, is used for parking. Parking spaces are not marked in this area. Using standards shown in the San Diego Municipal Code (Chapter 14, Article 2, Division 5), single parking spaces for off-street parking should measure 8.5 feet wide by 20 feet long, with 21-foot-wide aisles. A rough estimate of parking spaces in the dirt lot would be 70 spaces across the 600-foot length, and 6 rows of parking separated by 21-foot aisles in the 240-foot width, for a total of 420 spaces.

3.2.3 Impacts

Issues to be addressed are the following:

What direct and cumulative impacts would this project have on traffic circulation, traffic volume, and road capacity in the vicinity?

What direct and cumulative impacts would the project have on the safety of pedestrians, bicyclists, and equestrians using facilities in the area crossed by the road during construction of the road and bridge, and during operation of the completed project?

3.2.3.1 Issue 1a: Short-term Impacts of Construction

Additional Construction Traffic. Additional traffic would be generated during construction for any of the alternatives, from construction workers driving to the site, equipment and materials being transported to the site, and equipment being operated at the site. Typical City working hours are from 8:30 A.M. to 3:30 P.M., in order to minimize disruption to traffic during the peak traffic hours. Although construction workers may arrive earlier, the contribution to peak traffic is expected to be minimal, and equipment mobilization is expected to be conducted such that it would not contribute to peak traffic volumes.

Trucks carrying material for roadway fill and material excavated from the mitigation site are the most likely source of additional traffic during construction. However, around-the-clock operations are not expected to be needed for the planned construction. Imported and exported materials would be brought into and off the site during non-peak travel times. Therefore, materials transport would not contribute to peak traffic volumes.

Standard measures that would be incorporated into the project plans to reduce the effect of construction on traffic in the surrounding area include coordination with adjacent businesses and recreational entities to avoid special events, notification of surrounding land owners of construction activities, and development of traffic control plans with appropriate signage and protection devices such as K-rail.

Construction Activities on El Camino Real. For construction of the raised and widened road and bridge for all of the alternatives except the Eastern Alignment Alternative and Roundabout Alternative, one side would be constructed first, without closing the existing road or bridge, then traffic would be routed to the new two-lane facility to allow demolition of the existing bridge and construction of the new adjacent two-lane facility. Depending on the horizontal placement of the alternative, this concept for construction phasing will be easy or difficult to achieve. Table 3.2-4 indicates the approximate location of the proposed new centerline of the road in relation to the road edge, and includes comments on construction issues. All of the alternatives are considered constructible without closing this segment of El Camino Real and requiring detours. However, for some alternatives, the limited construction area would make building the new road and bridge difficult, and the constraints would tend to increase construction costs beyond what might normally be predicted.

The Eastern Alignment Alternative and Roundabout Alternative would offer the ability to construct the entire bridge and the four-lane roadway north of the bridge to Via de la Valle without affecting existing El Camino Real, and therefore, without the construction phasing required for the other alternatives. South of the bridge, the new road for the Eastern Alignment Alternative and Roundabout Alternative would be constructed in phases, with the eastern half constructed first, unconstrained by existing El Camino Real. Then traffic would be moved to the new eastern half, and the western half of the new road would be constructed.

Construction Activities on Via de la Valle. Via de la Valle would be widened from the south edge of the road, along which there is no access to any occupied properties. Existing two-way traffic would be maintained throughout the construction period. No detours or full road closures are anticipated to be needed, except for short-term activity to extend two driveways across Via de la Valle for the Roundabout Alternative.

Alternative	Distance of new centerline from edge of existing road	Half of new road to be built first	Anticipated difficulty of construction phasing	Comments
Central Alignment Alternative	Less than 10 feet from existing east edge.	East	Difficult	Limited construction area for separating the construction from the existing road, but feasible.
Road Capacity Alternative and Bicycle Safety Alternative	No separation from existing west edge.	West	Extremely difficult	A temporary wall would be needed to separate the construction from the existing road, and the area would be very constrained.
Western Alignment Alternative	Approximately 20 feet from existing west edge.	West	Unconstrained for phased construction of bridge and road widening	Adequate separation would facilitate construction.
Eastern Alignment Alternative and Roundabout Alternative	Approximately 200 feet from existing east edge.	Bridge and roadway north of bridge could be built any time. South of bridge, the east side would be built first.	Desirable. Completely separate from existing El Camino Real from bridge northward. Unconstrained for phased construction south of bridge.	Wide separation would facilitate construction more than any other alternative, substantially reducing overall duration of construction.
Lower Elevation Alternative	Less than 10 feet from existing east edge.	East	Difficult	Limited construction area for separating the construction from the existing road, but feasible.

Table 3.2-4Construction Phasing

Bridge Construction Duration. Bridge construction is expected to require a substantial amount of time to complete, and this time would vary with the different alternatives, as presented in Section 2.2.15. The construction duration estimates indicate that the bridge for the Central Alignment, Western Alignment, or Lower Elevation alternatives would require approximately 1.6 years to construct without any seasonal restrictions. Stopping construction over the river to avoid noise impacts on sensitive birds would increase construction time. Because the noise mitigation required due to the presence of sensitive avian species would prohibit construction during the time period of February 1 to September 15, the bridge for these alternatives would likely require three seasons to complete. The same would be true for the bridge for Road Capacity and Bicycle Safety alternatives, which would require approximately 1.5 years to complete without seasonal restrictions.

The construction duration estimates for the Eastern Alignment Alternative and Roundabout Alternative indicate the bridge would require approximately 1.3 years to construct without any seasonal restrictions. With seasonal restrictions that would prohibit bridge construction during the time period of February 1 to September 15, the bridge for these alternatives would likely require two seasons to complete.

Bridge Construction Staging. Except for the Eastern Alignment Alternative and Roundabout Alternative, which could be constructed in one stage, all of the bridge alternatives would have to be constructed in two stages, with two travel lanes built first while traffic remains on the existing bridge, then traffic moved to the new side of the bridge while the existing bridge is demolished and the other two lanes built. For the full footprint cross section alternatives that must be staged this way (Central Alignment, Western Alignment, and Lower Elevation alternatives), there would be sufficient width in each stage to meet City standards for two travel lanes during construction.

For the narrow footprint cross section alternatives (Road Capacity and Bicycle Safety alternatives), only 24.5 feet of the west side can be constructed in the first stage, due to the location of the centerline of the widened roadway and bridge. This means that with protective K-rails in place during construction, there would be only 21 feet available on the west side of the bridge for two lanes of traffic, or roughly 10.5 feet for each travel lane. A variance from City construction standards would be needed for this condition. This condition would apply to the second stage of construction, when traffic would be moved to the new west side, and the existing bridge would be demolished and the rest of the new bridge constructed to the east. Based on the construction duration estimates, the condition of narrow travel lanes on the west side of the new bridge could last for approximately 2 years with seasonal restrictions for noise impacts to sensitive birds.

Access to Existing Occupied Properties. Access to commercial and recreational properties would be maintained by provision of temporary access when driveways would be affected. Any temporary closure of driveways would be coordinated with the property owners/facility operators. As noted above, all alternatives except the Eastern Alignment Alternative and Roundabout Alternative would require construction of the bridge and roadway one-half at a time. When the eastern half of the roadway is constructed, access to the existing Polo Club fields would be affected when grading and filling activities approach the existing driveway. Temporary access would be established near the existing driveway, and the access would shift slightly during construction of the western half of the road is raised. During the construction of the western half of the road, access to Horsepark, Mary's Tack and Feed, and All Creatures Veterinary Hospital would be affected when grading and filling activities approach their existing driveways as the road construction approaches them, and the access would shift as the road is raised.

For the Eastern Alignment Alternative and Roundabout Alternative, the bridge and roadway north of the bridge would be constructed clear of existing El Camino Real, so access to Mary's Tack and Feed and All Creatures Veterinary Hospital would not be affected. New driveways for these properties would not be needed for this alternative, because the northern portion of existing El Camino Real would serve as the frontage road for the properties, preserving the existing driveways. The frontage road would be connected to a new perpendicular access road built at the location of the existing Horsepark driveway, and existing El Camino Real would terminate on the south end of the existing intersection with Via de la Valle.

For the Eastern Alignment Alternative and Roundabout Alternative, the existing access to Polo Club fields and the western part of the fields would be affected by the project. Access would be established at the location of the existing driveway through the break in the construction zone.

Other Construction Impacts. Construction impacts from erosion are discussed in Section 3.7: Hydrology/Water Quality. Construction impacts from dust are addressed in Section 3.10: Air Quality. Construction impacts from noise are discussed in Section 3.11: Noise.

3.2.3.2 Issue 1b: Existing Plus Project Impacts of Project Operation

To meet current CEQA requirements based on recent case law, an existing plus project analysis was also completed. To complete this analysis, the SANDAG Series 12 calibration model run for the year 2010 was used. The model predicted existing traffic on El Camino Real at very nearly the actual measured daily volume (16,300 versus 14,569), as compiled in Appendix E of the traffic study (Urban Systems Associates 2012). The calibrated model assignment was then rerun, but the network was coded as a 4-lane facility. The new forecast with project was then compared to the calibrated model run to determine how much traffic would most likely redistribute due to the added segment capacity resulting from building the project. That percentage change was then used to determine new segment and intersection volumes to be used for analysis.

Street segment LOS for the existing plus project condition (assuming a full widened roadway cross section with typical intersections) is presented in Table 3.2-5. All road segments are projected to improve from existing unacceptable LOS to acceptable LOS except for Via de la Valle east of El Camino Real North, which is projected to continue to operate at unacceptable LOS F. Improving this road segment would require construction in County of San Diego jurisdiction to the east, which is not a part of this project.

Intersection LOS for the existing plus project condition (assuming a full widened roadway cross section with typical intersections) is presented in Table 3.2-6. Acceptable levels of service are projected during both the A.M. and P.M. peak hours when existing redistributed traffic is loaded onto the proposed road and intersection system.

It should be noted that in applying typical proposed intersection configurations, the traffic analysis assumes four lanes on eastbound Via de la Valle at El Camino Real: a left-turn lane, two eastbound through lanes and a dedicated right-turn lane. All four lanes can be provided for the Eastern Alignment Alternative without taking additional right of way from Mary's Tack and Feed, but this configuration would require taking additional right of way along the northern edge of Mary's Tack and Feed for the Central, Western, and Lower Elevation alternatives. The project does not propose widening Via de la Valle beyond the existing property line along the northern edge of Mary's Tack and Feed. Therefore, the Central Alignment, Western Alignment, and Lower Elevation alternatives would not have the improved LOS at Via de la Valle and El Camino Real indicated in Tables 3.2-5 and 3.2-6. The results for the segment of Via de la Valle west of El Camino Real and the intersection at this location would reflect No Build conditions for all but the Eastern Alignment unless additional right of way is obtained.

It also should be noted that this analysis does not apply to the Road Capacity, Bicycle Safety, or Roundabout alternatives because these alternatives are analyzed separately.

Street	Segment	Lanes	Street Class.	Existing ADT	ADT with Project	Capacity at LOS E	V/C	LOS
Via de la Valle	West of El Camino Real	4	4-M	22,904	23,477	40,000	0.59	С
	El Camino Real to El Camino Real North	4	4-M	16,011	16,347	40,000	0.41	В
	East of El Camino Real North	2	2-C	13,149	13,425	10,000	1.34	F
El Camino Real North	North of Via de la Valle	2	2-C	3,664	3,678	10,000	0.37	А
El Camino Real	Via de la Valle to San Dieguito Road	4	4-M	14,559	16,015	40,000	0.40	В
	South of San Dieguito Road	4	4-M	13,902	14,402	40,000	0.36	А
San Dieguito Road	El Camino Real to Old El Camino Real	4	4-M	14,564	14,753	40,000	0.37	А

Table 3.2-5 Existing Plus Project Street Segment Levels of Service Build Alternatives*

Source: Urban Systems Associates 2012

2-C = 2-lane collector

4-M = 4-lane Major

LOS in **bold** indicates unacceptable conditions

*Analysis does not apply to Road Capacity, Bicycle Safety, or Roundabout alternatives.

s*
S

Table 3.2-6 Existing Plus Project Intersection Levels of Service

Source: Urban Systems Associates 2012

LOS = Level of Service

*Analysis does not apply to Road Capacity, Bicycle Safety, or Roundabout alternatives.

**Analysis incorporates four lanes (a left, two through lanes and a dedicated right) at Via de la Valle and El Camino Real for the Eastern Alignment Alternative, but this configuration is only achievable for the Central, Western, and Lower Elevation alternatives by taking additional right of way along the northern edge of Mary's Tack and Feed. Results for Via de la Valle at El Camino Real would reflect existing (No Build) conditions at this intersection for the Central, Western, and Lower Elevation alternatives unless additional right of way is obtained.

¹ Signalized

² Unsignalized

3.2.3.3 Issue 1c: Long-term Impacts of Project Operation

Year 2035 segment and peak hour forecast volumes were developed by the traffic consultants, reviewed by City staff, and agreed on for analysis (Urban Systems Associates 2012).

Year 2035 travel forecasts for ADT volumes are shown in Figure 3.2-4. The project segment of El Camino Real is expected to increase from 14,559 existing average daily trips to 33,000 average daily trips. This represents a future traffic increase of 18,441 daily trips or about 127 percent above existing traffic. The predicted traffic increases are due to approved and planned growth in the area addressed in other environmental and community planning documents.

Full Widened Roadway Project Alternatives. All of the project alternatives except for the Bicycle Safety Alternative and the No Build Alternative would provide four travel lanes. The following discussion relates to the Central Alignment, Western Alignment, Eastern Alignment, and Lower Elevation alternatives. The Road Capacity alternative would perform differently even though it would have four lanes because it would not have a usable median that would allow turn pockets at intersections (the striped median would be only 2 feet wide). This alternative and the Roundabout Alternative are addressed separately below. Street segment levels of service in 2035 for the project area without the project are shown in Table 3.2-7. Street segments except for El Camino Real North and El Camino Real south of San Dieguito Road are projected to operate at LOS F in the future without the project.

Street segment levels of service in 2035 for the Central Alignment, Western Alignment, Eastern Alignment, and Lower Elevation alternatives are presented in Table 3.2-8. For these alternatives, the existing and projected future LOS F would be improved to acceptable levels of service (LOS D or above) even with the increase in traffic, except where Via de la Valle continues east of El Camino Real North, which is outside of the project area.

Future intersection lane configurations assumed for this analysis with the project are shown in Figure 3.2-5. The A.M. and P.M. peak hour traffic volumes expected in Year 2035 are illustrated on Figure 3.2-6. Using the proposed configurations and anticipated future volumes, the expected level of service and delay at project intersections are compared to results without the project in Table 3.2-9.

It should be noted that in applying typical proposed intersection configurations, the traffic analysis assumes four lanes on eastbound Via de la Valle at El Camino Real: a left-turn lane, two eastbound through lanes, and a dedicated right-turn lane. All four lanes can be provided for the Eastern Alignment Alternative without taking additional right of way from Mary's Tack and Feed, but this configuration would require taking additional right of way along the northern edge of Mary's Tack and Feed for the Central, Western, and Lower Elevation alternatives. The project does not propose widening Via de la Valle beyond the existing property line along the northern edge of Mary's Tack and Feed. Therefore, the Central Alignment, Western Alignment, and Lower Elevation alternatives would not have the improved LOS at Via de la Valle and El Camino Real indicated in Tables 3.2-8 and 3.2-9. The results for the segment of Via de la Valle west of El Camino Real and the intersection at this location would reflect No Build conditions for all but the Eastern Alignment unless additional right of way is obtained.

In addition, the intersection of Via de la Valle and El Camino Real North would not be striped for full width improvements until the roadway east of the intersection is widened by the County of San Diego. In the interim, the intersection would reflect No Build conditions for all alternatives.

It also should be noted that this analysis does not apply to the Road Capacity, Bicycle Safety, or Roundabout alternatives, as discussed in more detail below, because these alternatives do not have typical intersections.

Street	Segment	Lanes	Street Class.	Existing ADT	Year 2035 ADT	Capacity at LOS E	V/C	LOS
Via de la Valle	West of El Camino Real	2	2-C	22,904	34,000	10,000	3.4	F
	El Camino Real / El Camino Real North	2	2-C	16,011	26,000	10,000	2.6	F
	East of El Camino Real North	2	2-C	13,149	22,000	10,000	2.20	F
El Camino Real North	North of Via de la Valle	2	2-C	3,664	7,000	10,000	0.70	С
El Camino Real	Via de la Valle/ San Dieguito Road	2	2-C	14,559	33,000	10,000	3.3	F
	South of San Dieguito Road	4	4-M	13,902	31,000	40,000	0.78	D
San Dieguito Road	El Camino Real / Old El Camino Real	2	2-C	14,564	19,500	10,000	1.95	F

Table 3.2-7 Year 2035 No Build Street Segment Levels of Service

Source: Urban Systems Associates 2012 2-C = 2-lane collector

4-M = 4-lane Major

LOS in **bold** indicates unacceptable conditions

Street	Segment	Lanes	Street Class.	Existing ADT	Year 2035 ADT	Capacity at LOS E	V/C	LOS
Via de la Valle	West of El Camino Real	4	4-M	22,904	34,000	40,000	0.85	D
	El Camino Real / El Camino Real North	4	4-M	16,011	26,000	40,000	0.65	С
	East of El Camino Real North	2	2-C	13,149	22,000	10,000	2.20	F
El Camino Real North	North of Via de la Valle	2	2-C	3,664	7,000	10,000	0.70	C
El Camino Real	Via de la Valle/ San Dieguito Road	4	4-M	14,559	33,000	40,000	0.83	D
	South of San Dieguito Road	4	4-M	13,902	31,000	40,000	0.78	D
San Dieguito Road	El Camino Real / Old El Camino Real	4	4-M	14,564	19,500	40,000	0.49	В

Table 3.2-8Year 2035 Street Segment Levels of ServiceBuild Alternatives*

Source: Urban Systems Associates 2012

2-C = 2-lane collector

4-M = 4-lane Major

LOS in **bold** indicates unacceptable conditions

*Analysis does not apply to Road Capacity, Bicycle Safety, or Roundabout alternatives.

Intersection	No Build		Eastern		Other Build	
			Alignment		Alternatives	
	Delay	LOS	Delay	LOS	Delay	LOS
Via de la Valle at El Camino Real ¹						
A.M. Peak Hour **	192	F	37.1	D	73.6	E
P.M. Peak Hour **	262.1	F	48.7	D	136.6	F
Via de la Valle at El Camino Real						
North Ultimate ¹						
A.M. Peak Hour	90.8	F	24.9	С	24.9	С
P.M. Peak Hour	103.4	F	35.4	D	35.4	D
El Camino Real at San Dieguito Road ¹						
A.M. Peak Hour	22.3	С	19.6	В	19.6	В
P.M. Peak Hour	46	D	20.1	С	20.1	С
El Camino Real at Horsepark/Polo Grounds ²						
A.M. Peak Hour	209.2	F	9.6	А	9.6	А
P.M. Peak Hour	Error	F	22.9	С	22.9	С
Old El Camino Real at San Dieguito Road ³						
A.M. Peak Hour	53	F	22.3	С	22.3	С
P.M. Peak Hour	88.6	F	30.8	D	30.8	D

Table 3.2-9 Year 2035 Intersection Levels of Service No Build and Build Alternatives*

Source: Urban Systems Associates 2012

LOS = Level of Service

Error = Indicates the delay is greater than the accuracy of the model

¹ Signalized for No Build and Build alternatives

² Unsignalized for No Build, Signalized for Build alternatives

³ Unsignalized for No Build and Build alternatives

LOS in **bold** indicates unacceptable conditions

*Analysis does not apply to Road Capacity, Bicycle Safety, or Roundabout alternatives.

Analysis incorporates four lanes (a left, two through lanes and a dedicated right) at Via de la Valle and El Camino Real for the Eastern Alignment Alternative, but this configuration is only achievable for the Central, Western, and Lower Elevation alternatives by taking additional right of way along the northern edge of Mary's Tack and Feed. Results for Via de la Valle at El Camino Real for the Central, Western, and Lower Elevation alternatives would reflect conditions indicated in the column labeled "Other Build Alternatives" unless additional right of way is obtained. **Two Lane and Four Lane (No Usable Median) Project Alternatives. The Bicycle Safety Alternative would provide only two travel lanes, in order to also provide bicycle lanes and a 14-foot-wide median, but keep a narrow footprint. In terms of number of travel lanes, the Bicycle Safety Alternative is equivalent to the No Build Alternative. The Road Capacity Alternative would provide four lanes, but the narrow median would be inadequate to accommodate turn lanes, which require a minimum of 10 feet in width.

Table 3.2-10 presents the City of San Diego functional roadway classifications and levels of service based on estimated future ADT. From a traffic perspective, all alternatives that provide four through traffic lanes have capacities of either 30,000 or 40,000 daily trips at LOS E. The Bicycle Safety Alternative and the No Build Alternative, with only two travel lanes, each have traffic capacity of 10,000 average daily trips. The Road Capacity Alternative would have a capacity of 15,000 ADT, corresponding to a 4-lane Collector with no center lane. Therefore, these alternatives would result in unacceptable LOS F. This means that these alternatives would result in no improvement of traffic level of service over existing congested conditions. The street segment analysis for the Road Capacity and Bicycle Safety alternatives is presented in Table 3.2-11. Intersection operations for these alternatives would be the same as the LOS for No Build conditions in Table 3.2-9.

		Level of Service					
Street Classification	Lanes	Α	В	С	D	Е	
Freeway	8 lanes	60,000	84,000	120,000	140,000	150,000	
Freeway	6 lanes	45,000	63,000	90,000	110,000	120,000	
Freeway	4 lanes	30,000	42,000	60,000	70,000	80,000	
Expressway	6 lanes	30,000	42,000	60,000	70,000	80,000	
Prime Arterial	6 lanes	25,000	35,000	50,000	55,000	60,000	
Major Arterial	6 lanes	20,000	28,000	40,000	45,000	50,000	
Major Arterial	4 lanes	15,000	21,000	30,000	35,000	40,000	
Collector	4 lanes	10,000	14,000	20,000	25,000	30,000	
Collector (no center lane) (continuous left-turn lane)	4 lanes 2 lanes	5,000	7,000	10,000	13,000	15,000	
Collector (no fronting property)	2 lanes	4,000	5,500	7,500	9,000	10,000	
Collector (commercial- industrial fronting)	2 lanes	2,500	3,500	5,000	6,500	8,000	
Collector (multi-family)	2 lanes	2,500	3,500	5,000	6,500	8,000	
Sub-Collector (single-family)	2 lanes			2,200			

 Table 3.2-10

 Roadway Classifications, Levels of Service (LOS) and Average Daily Traffic (ADT)

Source: Urban Systems Associates 2012

LEGEND:

XX/XXX + Approximate recommended ADT based on the City of San Diego Street Design Manual.

NOTES:

- 1. The volumes and the average daily level of service listed above are only intended as a general planning guideline.
- 2. Levels of service are not applied to residential streets since their primary purpose is to serve abutting lots, not carry through traffic. Levels of service normally apply to roads carrying through traffic between major trip generators and attractors.

Project Alternative	El Camino Real Segment	Lanes	Street Class.	Existing ADT	Year 2035 ADT	Capacity at LOS E*	V/C	LOS
Bicycle Safety Alternative (Two Lanes)	Via de la Valle / San Dieguito Road	2	2-C	14,559	33,000	10,000	3.30	F
Road Capacity Alternative (Four Lanes, No Usable Median)	Via de la Valle / San Dieguito Road	4	4-C (no median)	14,559	33,000	15,000	2.20	F

Table 3.2-11Year 2035 Street Segment Level of ServiceRoad Capacity and Bicycle Safety Alternatives

Source: Urban Systems Associates 2012

* = Capacity from Table 3.2-10

LOS in **bold** indicates unacceptable conditions

Roundabout Alternative. An operational analysis was completed by Ourston Roundabout Engineering in cooperation with Rick Engineering Company for four intersections located on the El Camino Real / Via de la Valle corridor between San Dieguito Road and Via de la Valle and between El Camino Real and El Camino Real North. The complete analysis is presented in Appendix H of the traffic study (Urban Systems Associates 2012) and summarized below.

Based on Year 2035 A.M. and P.M. peak hour traffic forecasts, the capacity for the roundabout intersections was analyzed using ARCADY roundabout design and capacity analysis software. ARCADY (Assessment of Roundabout Capacity and Delay) is a program based on U.K. empirical research into geometry-capacity relationships. The results represent the most probable capacity of the roundabout and employ capacity measures of LOS, delay, and queuing consistent with typical unsignalized capacity analysis methodologies (Highway Capacity Manual 2010). The following four intersections were analyzed as roundabouts:

- Via de la Valle at El Camino Real
- Via de la Valle at El Camino Real North
- El Camino Real at San Dieguito Road
- El Camino Real at the Polo Club fields/Horsepark access driveways

Table 3.2-12 summarizes the overall operations at the roundabouts with existing traffic volumes (existing plus project) and 2035 traffic projections.

Roundabout Location	Existing P	lus Project	2035 Project		
	Average Delay	Overall LOS	Average Delay	Overall LOS	
Via de la Valle at El Camino Real Interim Design					
A.M. Peak Hour	3.1	А	37.0	Ε	
P.M. Peak Hour	3.3	А	204.2	F	
Via de la Valle at El Camino Real North					
A.M. Peak Hour	2.7	А	5.6	А	
P.M. Peak Hour	2.5	А	7.1	А	
El Camino Real at San Dieguito Road					
A.M. Peak Hour	3.3	А	12.4	В	
P.M. Peak Hour	3.0	А	8.1	А	
El Camino Real at Horsepark/Polo Grounds					
A.M. Peak Hour	2.3	А	4.0	А	
P.M. Peak Hour	2.7	А	9.7	А	

Table 3.2-12Existing Plus Project and Year 2035 Roundabout Levels of Service

Source: Urban Systems Associates 2012 (Appendix H: Ourston Roundabout Engineering Technical Memorandum)

LOS in **bold** indicates unacceptable conditions

The analysis indicates that most of the roundabouts would operate with minimal overall delays and a high LOS of A or B in existing plus project and 2035 conditions. However, the roundabout at Via de la Valle and El Camino Real would operate at unacceptable LOS E and F in the 2035 A.M. and P.M. peak hour, respectively. The roundabout study notes that the traffic counts that are the basis for 2035 projections were taken when there was an event at the polo fields. An expanded design (designated in the roundabout study as the "ultimate" design for this roundabout) that would add a second southbound lane and a northbound dual right turn partial bypass would improve the operations of this roundabout to LOS A for A.M. and P.M. peak hours in 2035. However, the City would not build the ultimate design if the Roundabout Alternative is selected in order to minimize the footprint of this alternative. Therefore, in 2035, the roundabout of Via de la Valle at El Camino Real would have LOS E for the A.M. peak hour and LOS F for the P.M. peak hour, as shown in Table 3.2-12.

3.2.3.4 Issue 1d: Long-term Impacts on Local Access

Access for the Central Alignment, Western Alignment, and Lower Elevation Alternatives. For the Central Alignment, Western Alignment, and Lower Elevation alternatives, which have the new roadway in a four-lane major roadway configuration, left turns out of the existing commercial establishment along El Camino Real (Mary's Tack and Feed) would be prohibited. However, these four-lane project alternatives would provide a signalized intersection at the Horsepark and Polo Club driveways for northbound and southbound traffic. Also, a special median break turn pocket would be provided at Mary's Tack and Feed to allow northbound traffic on El Camino Real to turn left into the driveway of this commercial establishment.

For all of the alternatives except the Eastern Alignment Alternative and the Roundabout Alternative, the existing wide driveway/parking area along the east side of Mary's Tack and Feed that parallels El Camino Real would be eliminated. A 32-foot-wide driveway would be constructed off of El Camino Real for Mary's Tack and Feed and the veterinary hospital, and a second 32-foot-wide driveway would be constructed about 40 feet to the west for a right turn into the upper parking lot of Mary's Tack and Feed. Based on a turning movement analysis of each of the alternatives, the maximum size truck that could use the modified driveways from both a right and left turn from El Camino Real would be a truck with a single 33-foot trailer, classified as a WB-40.

All of the alternatives would involve widening Via de la Valle between El Camino Real North and the western end of the project. Current plans for all build alternatives provide an underground storm drain parallel to Via de la Valle for local nuisance flow. Drainage from the north exceeding low flow volumes would be carried under Via de la Valle at El Camino Real North in a reinforced concrete box (RCB) culvert sized for the 100-year flow. Flow would exit the undercrossing onto the property south of Via de la Valle similar to existing drainage patterns. Therefore, large storm events will continue to flow overland in a southerly direction toward the San Dieguito River unless the pattern is modified by future development plans by the property owner. The underground storm drain system would be buried under the new portion of widened Via de la Valle, thereby minimizing the right of way needed along this edge of the private property, and facilitating future access to be designed for future development by the property owner.

Access for the Eastern Alignment Alternative. For the Eastern Alignment Alternative, access to Mary's Tack and Feed and the veterinary hospital would be provided from the new signalized intersection at Horsepark/Polo Club driveways on the new road alignment via a frontage road in the existing alignment of El Camino Real. Northbound drivers wishing to enter Mary's Tack and Feed and the veterinary hospital would turn left at the Horsepark driveway signal, then right onto the frontage road, and left into the veterinary hospital or Mary's Tack and Feed driveways. Southbound drivers on the new roadway would turn right at the signalized Horsepark driveway, and continue on the frontage road as described above. Drivers exiting the properties would turn right (southbound) onto the frontage road, turn left onto the access road, and then could turn left at the signalized Horsepark/Polo Club intersection to continue northbound on the new El Camino Real to Via de la Valle, or turn right to continue southbound on the new El Camino Real toward San Dieguito Road.

For the Eastern Alignment Alternative, the north end of existing El Camino Real at Via de la Valle would be closed on the south side of the road, so drivers on Via de la Valle would not be able to access the frontage road. The new intersection with Via de la Valle would be at De la Valle Place, and would be signalized. At this location, a driver on Via de la Valle would turn onto the new southbound El Camino Real, and then turn right at the signalized Horsepark/Polo Club intersection to access the frontage road.

For the Eastern Alignment, larger trucks could turn off El Camino Real to access the frontage road than for the other build alternatives. Based on a turning movement analysis, trucks with a

single 33-foot-long trailer (WB-40), a single 42.5-foot-long trailer (WB-50), and double 28.5-foot-long trailers (WB-67D) could all turn onto the frontage road from the new road.

Also for the Eastern Alignment Alternative, access would change to the restaurant and commercial offices parking lot at the north leg of the existing intersection of El Camino Real and Via de la Valle. Only right turns in and out would be allowed with the Eastern Alignment Alternative. To enter this parking lot, a driver would have to be traveling west on Via de la Valle and turn right into the parking lot. Drivers traveling north on new El Camino Real would turn left at the new signalized intersection at De la Valle Place, travel westward briefly on Via de la Valle, and turn right into the parking lot. Leaving this parking lot, a driver would only be able to travel west on Via de la Valle toward I-5. Drivers exiting this parking lot would not be able to turn left toward new El Camino Real, or cross Via de la Valle to existing El Camino Real, which would become a cul-de-sac. Drivers wishing to travel eastward on Via de la Valle would have to make a U-turn at the next intersection that would allow this movement, currently San Andreas Drive, approximately 1 mile from the restaurant. If the current restaurant provides valet parking at Mary's Tack and Feed, this would become more difficult. However, the upper parking lot off of De la Valle Place also serves the restaurant and offices. This lot would continue to be accessible from De la Valle Place. Drivers leaving this parking lot would turn right onto De la Valle Place, and then would be able to turn left or right onto Via de la Valle, or continue southward on new El Camino Real at the signalized, four-way intersection. Drivers entering and exiting the gated community at the north end of De la Valle Place would also use this signalized intersection with the Eastern Alignment Alternative.

To address changes in access for businesses along Via de la Valle, U-turns would be allowed at the following locations: Via del Canon/Via de la Valle for westbound traffic on Via de la Valle to return east (part of the separate City project for widening Via de la Valle west of existing El Camino Real); El Camino Real/De la Valle Place for eastbound traffic on Via de la Valle to return west (part of this proposed project); and El Camino Real/Del la Valle Place for westbound traffic on Via de la Valle to return east (part of this proposed project); U-turns could also be accommodated at the modified intersection of El Camino Real North/Via de la Valle for eastbound traffic on Via de la Valle to return west as part of this proposed project with some modifications to the proposed interim condition striping and additional pavement widening east of El Camino Real North. These signalized intersections would reduce the travel distance for drivers needing to make U-turns to access businesses adjacent to Via de la Valle within the project area.

Access for the Narrow Cross Section Alternatives. For the Road Capacity Alternative, the new intersection at Horsepark/Polo Club and the median break for Mary's Tack and Feed would not be included because only a 2-foot-wide striped median would be provided. Only right turns in and out would be allowed at the driveways of the properties along El Camino Real. Therefore, drivers would have to enter Horsepark, Mary's Tack and Feed, and the veterinary hospital from the north (meaning they would have to be traveling southbound on El Camino Real). Drivers could only exit these properties to the right, and would have to continue southbound on El Camino Real. Drivers could only enter the Polo Club fields by turning right from northbound El Camino Real, and would have to continue northbound on El Camino Real when exiting the Polo Club fields driveway.

The Bicycle Safety Alternative would be a two-lane project. This alternative would provide the new intersection at Horsepark/Polo Club and the median break for Mary's Tack and Feed, because this alternative would include a 14-foot median. Therefore, access would be similar to

the situation described above for the Central Alignment, Western Alignment, and Lower Elevation alternatives.

Access for the Roundabout Alternative. Access patterns for this alternative would be similar to the patterns with the Eastern Alignment alternative, except that roundabouts, which are unsignalized, would be constructed instead of signalized intersections. Northbound drivers wishing to enter Mary's Tack and Feed and the veterinary hospital would circle around at the Horsepark roundabout, then turn right onto the frontage road, and left into the veterinary hospital or Mary's Tack and Feed driveways. Southbound drivers on the new roadway would exit right at the Horsepark roundabout, and continue on the frontage road as described above. Drivers exiting the properties would turn right (southbound) onto the frontage road, turn left to enter the roundabout, and then could circle halfway around to continue northbound on the new El Camino Real to Via de la Valle, or circle immediately to the right to continue southbound on the new El Camino Real toward San Dieguito Road.

For the Roundabout Alternative, the north end of existing El Camino Real at Via de la Valle would be closed on the south side of the road, so drivers on Via de la Valle would not be able to access the frontage road. The new intersection with Via de la Valle would be at De la Valle Place, and would be a roundabout. At this location, an eastbound driver on Via de la Valle would circle immediately right onto the new southbound El Camino Real, and then circle immediately right at the Horsepark/Polo Club roundabout to access the frontage road. A westbound driver would circle halfway around the roundabout at De la Valle Place to southbound El Camino Real and then circle immediately right at the Horsepark/Polo Club roundabout to access the frontage road.

The Horsepark entrance is proposed to handle WB-67 vehicles which are larger than trucks carrying horse trailers. In general, a WB-67 vehicle was used to design the roundabouts for conservative estimation of the truck paths; the WB-67 has a longer trailer than the standard Caltrans vehicle STAA-STD-50.

Access to the restaurant and commercial offices parking lot at the north leg of the existing intersection of El Camino Real and Via de la Valle would be affected similarly as with the Eastern Alignment. However, U-turns would not need to be provided at intersections within the project because changes in direction would be accomplished by circling within the roundabouts at De la Valle Place or El Camino Real North. U-turns would be allowed at the proposed signal at Via del Canon/Via de la Valle, as discussed above.

3.2.3.5 Issue 1e: Long-term Impacts on Parking

North of Via de la Valle. Parking spaces in the lots north of Via de la Valle would not be affected by any of the alternatives.

Mary's Tack and Feed. Spaces in the upper lot of Mary's Tack and Feed, and in the veterinary hospital parking lot would not be affected by any of the alternatives.

The Central Alignment Alternative would cut off direct access from El Camino Real to the lower parking lot of Mary's Tack and Feed. For this alternative, new access to the lower parking lot would be graded from the adjusted driveway along the south edge of the property.

The Western Alignment Alternative would eliminate the lower parking lot for Mary's Tack and Feed, which is not striped for parking. This alternative would decrease available parking at

Mary's Tack and Feed by an estimated 5 spaces, based on 8.5 feet width for parking spaces in a length of approximately 40 feet.

Horsepark. Parking in the dirt lot at Horsepark would be affected only by the Western Alignment Alternative. The other alternatives would not affect the area available for parking at Horsepark. The Western Alignment Alternative would extend approximately 70 feet into usable parking area on the dirt lot parallel to El Camino Real. In the affected area, one row of parking spaces approximately 600 feet long (south from the entrance to the river) would be eliminated by the widened road and slope. Assuming 8.5-foot-wide parking spaces, approximately 70 parking spaces on Horsepark would be eliminated by the Western Alignment Alternative. This number of spaces would represent approximately 17 percent of the estimated 420 available spaces in the parking area.

South of Via de la Valle. To the extent that occasional parking occurs on the privately owned, currently undeveloped property south of Via de la Valle and east of El Camino Real, this parking would be reduced along the western edge of the property by the Central Alignment, Eastern Alignment, Roundabout, and Lower Elevation alternatives. The Roundabout Alternative would reduce the greatest area on the currently undeveloped property. All of the build alternatives would reduce the available area for parking along the northern edge of this property due to the widening of Via de la Valle. However, there is no master plan for this site to indicate where and when parking currently occurs on this property. Development plans for this property are being coordinated with the City to account for encroachments under the various alternatives.

3.2.3.6 Issue 2: Impacts on Pedestrians, Bicyclists, and Equestrians

Impacts during Construction. No pedestrian facilities exist along this segment of El Camino Real today, but any current use of the shoulder by pedestrians would have to cease during construction, initially along whichever is the first side of the road to be built, and then along the opposite side, depending on the alternative (see Table 3.2-4). Also, when the new half of the road is constructed next to the Horsepark and Polo Club driveways, the new road and existing road would be at different elevations, and pedestrian and equestrian crossing would be difficult. Bicyclists currently using the existing roadway would still be able to ride in the street during construction, because the existing road would remain open during the phased construction of the project. However, the construction zone would be constrained for the Central Alignment, Road Capacity, Bicycle Safety, and Lower Elevation alternatives. Impacts to pedestrians and bicyclists would be minimized by the Eastern Alignment Alternative and Roundabout Alternative because El Camino Real bridge and roadway would be completed. During active construction of the bridge, the existing practice of equestrians crossing under the bridge would need to be halted to protect horses and riders from heavy equipment that would be operating in the area.

Impacts after Project Completion. After project completion, the level of improvement in facilities for pedestrians, bicyclists, and equestrians would vary depending on the alternative. Table 3.2-13 shows how conditions would change for these users. Pedestrians, bicyclists and equestrians would experience improvements from the multi-use trail under crossing under the north bridge abutment after project completion for all alternatives except the Lower Elevation Alternative, which is the only build alternative that would not provide this project feature. For the Lower Elevation Alternative, equestrians could continue to cross under the new bridge as they currently do under the existing bridge, by riding downslope into the river and up the river bank on the other side. No trail in the river would be created, but the proposed project would not prohibit

this existing practice, except during construction when the area around the bridge would be closed off for all alternatives.

Equestrians would experience improvements from the cantilever trail on the west side of the bridge, which is a feature that could be built by others for all build alternatives. Users crossing from Horsepark to Polo Club at the driveways would experience an improvement due to the signalized pedestrian crossing provided for all build alternatives except the Roundabout Alternative.

Pedestrians and bicyclists would not experience improvement because of the lack of protected facilities with the Road Capacity Alternative, which would create four lanes of traffic without providing pedestrian walkways or bicycle lanes. Pedestrians would not experience improvement with the Bicycle Safety Alternative, although bicyclists would have new striped bike lanes for more protected travel.

For the Roundabout Alternative, pedestrians would be accommodated by the sidewalks around the roundabouts with crosswalks located away from the central roundabout areas. Bicyclists would have two options. They could traverse the roundabouts by choosing to travel through the roundabout like the other vehicles, or they may choose to exit the roadway at the bike off-ramp and use the wider shared use sidewalk to travel like a pedestrian and re-enter the roundabout at the downstream bike on ramp. This condition would not be as favorable as the alternatives providing pedestrian and bicycle facilities with signalized intersections.

Equestrians currently riding along the east side of El Camino Real would be adversely affected by the Central Alignment, Eastern Alignment, Roundabout, and Lower Elevation alternatives, which would encroach onto the expanded golf course. However, equestrians would be able to use the cantilever trail on the west side of the bridge, which is a feature that could be built by others for all build alternatives.

Alternative	Facilities Provided	Users Benefiting from Project Changes	Users Adversely Affected or Not Benefiting from Project Changes	Comments
Central Alignment	 Pedestrian walkway/parkway Bicycle lanes Multi-use trail undercrossing under north bridge abutment Signalized crossing at Horsepark/Polo Club driveways Cantilever trail on west side of bridge 	 Pedestrians Bicyclists Equestrians crossing under north bridge abutment Users crossing from Horsepark to Polo Club and vice versa 	- Path next to golf course would narrow for equestrians currently riding along east edge of El Camino Real; however, they could use the cantilever trail on the west side of the bridge	Toe of road embankment slope would extend roughly 70 feet east of the City property line for the expanded golf course (south of river); slope plus re- created drainage ditch would extend 120 feet east of City property line parallel to El Camino Real at Polo Club.
Road Capacity	 Multi-use trail undercrossing under north bridge abutment Signalized crossing at Horsepark/Polo Club driveways for pedestrian/equestrian use only; no vehicular intersection Cantilever trail on west side of bridge 	 Equestrians crossing under north bridge abutment Users crossing from Horsepark to Polo Club and vice versa 	- Pedestrians - Bicyclists	Pedestrians and bicyclists would not have protected space, but would be along a busier roadway with higher speeds. Roadway would not encroach on expanded golf course or Polo Club, so equestrians currently riding along east edge of El Camino Real would not be affected directly, although a retaining wall would be adjacent to the road edge.
Bicycle Safety	 Bicycle lanes Multi-use trail undercrossing under north bridge abutment Signalized crossing at Horsepark/Polo Club driveways Cantilever trail on west side of bridge 	 Bicyclists Equestrians crossing under north bridge abutment Users crossing from Horsepark to Polo Club and vice versa 	- Pedestrians	Pedestrians would not have protected space. Roadway would not encroach on expanded golf course or Polo Club, so equestrians currently riding along east edge of El Camino Real would not be affected directly, although a retaining wall would be adjacent to the road edge.
Western Alignment	 Pedestrian walkway/parkway Bicycle lanes Multi-use trail undercrossing under north bridge abutment Signalized crossing at Horsepark/Polo Club driveways Cantilever trail on west side of bridge 	 Pedestrians Bicyclists Equestrians crossing under north bridge abutment Users crossing from Horsepark to Polo Club and vice versa 	- None identified	Roadway would encroach only slightly on expanded golf course and not on Polo Club, so equestrians currently riding along east edge of El Camino Real would not be affected directly.

 Table 3.2-13

 Conditions after Project Completion for Pedestrians, Bicyclists, and Equestrians

Alternative	Facilities Provided	Users Benefiting from Project Changes	Users Adversely Affected or Not Benefiting from Project Changes	Comments
Eastern Alignment	 Pedestrian walkway/parkway Bicycle lanes Multi-use trail undercrossing under north bridge abutment Signalized crossing at Horsepark/Polo Club driveways Cantilever trail on west side of bridge 	 Pedestrians Bicyclists Equestrians crossing under north bridge abutment Users crossing from Horsepark to Polo Club and vice versa 	- Equestrians currently riding along east edge of El Camino Real; however, they could use the cantilever trail on west side of bridge.	Toe of road embankment slope would extend roughly 115 feet east of the City property line for the expanded golf course (south of river); the road and slope would extend 205 feet east of City property line parallel to El Camino Real at Polo Club, except where driveway would be constructed
Roundabout	 Pedestrian walkway/parkway Bicycle lanes Multi-use trail undercrossing under north bridge abutment Cantilever trail on west side of bridge 	 Pedestrians Bicyclists Equestrians crossing under north bridge abutment Users crossing from Horsepark to Polo Club and vice versa 	- Pedestrians and bicyclists would not benefit to the same extent as with the other full widening alternatives due to unsignalized roundabouts instead of signalized intersections.	Toe of road embankment slope would extend roughly 115 feet east of the City property line for the expanded golf course (south of river); the road and slope would extend 205 feet east of City property line parallel to El Camino Real at Polo Club, except where driveway would be constructed
Lower Elevation	 Pedestrian walkway/parkway Bicycle lanes Signalized crossing at Horsepark/Polo Club driveways Cantilever trail on west side of bridge 	- Pedestrians - Bicyclists - Users crossing from Horsepark to Polo Club and vice versa	- Equestrians currently riding along east edge of El Camino Real; however, they could use the cantilever trail on the west side of the bridge.	Toe of road embankment slope would extend roughly 70 feet east of the City property line for the expanded golf course (south of river); slope plus recreated drainage ditch would extend 115 feet east of City property line parallel to El Camino Real at Polo Club. An elevated platform multi-use trail undercrossing would not be provided, but the existing practice of crossing under the bridge would not be prohibited by the project.

Table 3.2-13 (continued)

3.2.3.7 No Build Alternative

The No Build Alternative would avoid all of the potential impacts during construction. However, this alternative would not offer the improvements that would be provided by the various alternatives to drivers as well as pedestrians, bicyclists, and equestrians. By not widening El Camino Real, LOS would worsen from an already impacted level of F as regional and local traffic trips increase.

3.2.4 Significance of Traffic/Circulation Impacts under CEQA

3.2.4.1 CEQA Significance Thresholds

The City of San Diego Significance Determination Thresholds (City of San Diego 2011) provide several relevant thresholds for potential traffic/circulation impacts from the proposed project, as follows:

- If any intersection or roadway segment affected by a project would operate at LOS E or F under either direct or cumulative conditions, the impact would be significant if the project exceeds the allowable increases in delay or intersection capacity utilization for affected intersections or volume-to-capacity ratio or speed for affected roadway segments, as shown in the thresholds.
- If a project would increase traffic hazards to motor vehicles, bicyclists or pedestrians due to proposed non-standard design features.
- If the project would result in the construction of a roadway which is inconsistent with the General Plan and/or a community plan, the impact would be significant if the proposed roadway would not properly align with other existing or planned roadways.
- If a project would result in a substantial restriction in access.

In addition, the City's thresholds address parking, noting that parking requirements vary by land use and location and are dictated by the City Municipal Code and adopted by the City Council policies. Non-compliance with the City's parking ordinance does not necessarily constitute a significant environmental impact. However, it can lead to a decrease in the availability of existing public parking in the vicinity of the project. Generally, if a project is deficient by more than 10 percent of the required amount of parking and at least one of the following criteria applies, then a significant impact may result:

- 1. The project's parking shortfall or displacement of existing parking would substantially affect the availability of parking in an adjacent residential area, including the availability of public parking.
- 2. The parking deficiency would severely impede the accessibility of a public facility, such as a park or beach.

3.2.4.2 Determination of Significance under CEQA

The conclusions of significance under CEQA for the alternatives analyzed are summarized in Table 3.2-14 and discussed below.

Short-term Level of Service. In terms of short-term construction conditions, the build alternatives would add minimal traffic during peak hours. All of the build alternatives would maintain two lanes for traffic throughout the duration of construction, although during the second stage of bridge construction, the Road Capacity and Bicycle Safety alternatives would require non-standard narrow traffic lanes for approximately 2 years. Since essentially the same conditions as existing would be provided for traffic during construction, impacts on short-term LOS would not be significant for any of the build alternatives.

Long-term Level of Service. In terms of operations, the build alternatives would either provide acceptable LOS in 2035 or result in a LOS that would be no worse than the No Build condition in 2035. Not improving the LOS is not a significant impact of the project. The impact on long-term LOS would not be significant for the Central Alignment, Western Alignment, Eastern Alignment, Lower Elevation, Roundabout, Road Capacity, and Bicycle Safety alternatives.

At the intersection of El Camino Real and Via de la Valle, only the Eastern Alignment Alternative would have an improved long-term operation (LOS D) in the A.M. and P.M. peak hours because only this alternative would provide a total of four lanes on the intersection approach for traffic movements (left turn, two through lanes, and a dedicated right-turn lane) for eastbound traffic on Via de la Valle on the west side of El Camino Real. The long-term intersection operation at the intersection of Via de la Valle and El Camino Real would be similar to No Build conditions (LOS F) with slightly less delay for the other build alternatives because providing all of the lanes needed (or the ultimate roundabout configuration needed for the Roundabout Alternative) would require additional right-of-way that would have undesirable impacts on the Mary's Tack and Feed property. Specifically for the Roundabout Alternative, the "ultimate" design for the roundabout at El Camino Real and Via de la Valle would add a second southbound lane and a northbound dual right turn partial bypass, which would improve the operations of this roundabout to LOS A for the A.M. and P.M. peak hours. The City is not proposing the ultimate roundabout design for the Roundabout Alternative at this location in order to minimize the footprint of this alternative.

At the intersection of Via de la Valle and El Camino Real North, only the Roundabout Alternative would have an improved long-term operation (LOS A) in the A.M. and P.M. peak hours because only this alternative would provide transitions east and north of the intersection. For all of the other build alternatives, the full width configuration would be constructed west of the intersection, but full benefit could not be achieved at this intersection without widening of Via de la Valle for a transition for four lanes to two lanes east of El Camino Real North. Although the full width configuration would be constructed up to El Camino Real North, the striping for a full width intersection would not be provided because that would require construction of a transition that would extend beyond the project area into County of San Diego jurisdiction. However, the 2035 LOS at this intersection for all build alternatives would be no worse than the No Build condition, and therefore, impacts on long-term LOS at this intersection would not be significant for any of the build alternatives.

Traffic Hazards. Impacts from traffic hazards would be significant and unmitigable for the Road Capacity Alternative, because this alternative would increase hazards to pedestrians and bicyclists by providing four lanes for vehicles but no facilities for pedestrians and bicyclists, which is non-standard for a City major roadway. Impacts from traffic hazards also would be significant and unmitigable for the Bicycle Safety Alternative for not providing facilities for pedestrians, which is non-standard for a City major roadway. Impacts from traffic hazards would not be significant for any of the other build alternatives.

General Plan Consistency. Impacts on traffic from inconsistencies with the General Plan and/or a community plan would not be significant for any of the build alternatives. Even though the Road Capacity and Bicycle Safety alternatives would not provide the type of configuration envisioned in the General Plan Mobility Element, these alternatives would align with other existing and planned roadways. The other build alternatives would provide the general configuration envisioned and generally improve operational performance with the exceptions noted previously.

Access. Impacts due to restriction of access would be significant and unmitigable for the Road Capacity Alternative for substantially restricting access to Mary's Tack and Feed, a privately owned business, and Horsepark and Polo Club, publicly owned properties. Impacts due to restriction of access would not be significant for any of the other build alternatives. Although the Eastern Alignment Alternative and Roundabout Alternative would change access patterns for the restaurant in the northeast corner of the existing intersection of El Camino Real and Via de la Valle, this impact would not be significant because drivers would still be able to access the parking lot by right-in and right-out turning movements, and could make other turning movements at signalized intersections within approximately 1 mile west of the restaurant, or at proposed signalized intersections or roundabouts to the east. For the private parcel south of Via de la Valle and east of El Camino Real, potential access would not be changed, and impacts due to restriction of access would not be significant.

Parking. Impacts on parking would not be significant for any of the alternatives. The project is not required to provide parking. The Western Alignment Alternative would reduce available parking by an estimated 70 spaces at Horsepark, but this parking lot is not striped for parking, and the displacement would not substantially affect the availability of parking in an adjacent residential area. The Western Alignment Alternative would also reduce parking by an estimated 5 spaces at Mary's Tack and Feed, however, this lot also is not striped for parking. In addition, these locations are not public facilities.

3.2.5 Mitigation Measures

There are no measures available to mitigate for the significant impacts on hazards for the Road Capacity and Bicycle Safety alternatives. There are no measures available to mitigate for the significant impacts on access to properties along El Camino Real caused by the Road Capacity Alternative. These impacts could be avoided by selecting another alternative for the project.

3.2.6 Significant and Unmitigable Impacts under CEQA

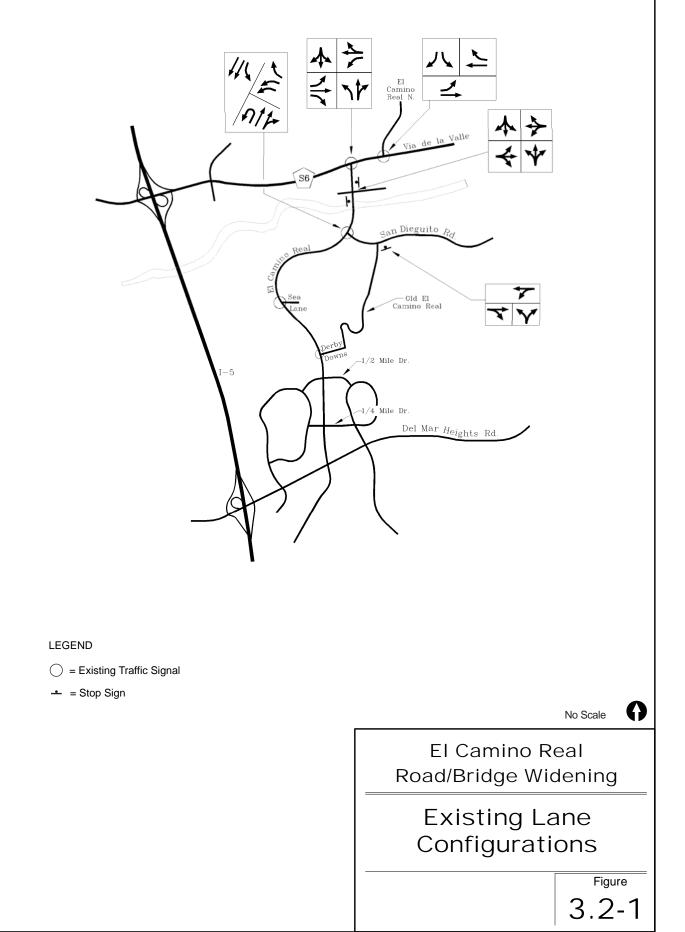
As noted above, there are no measures to mitigate for the impacts of the Road Capacity Alternative on hazards to pedestrians and bicyclists, and reduction of access. These impacts of the Road Capacity Alternative remain unmitigable.

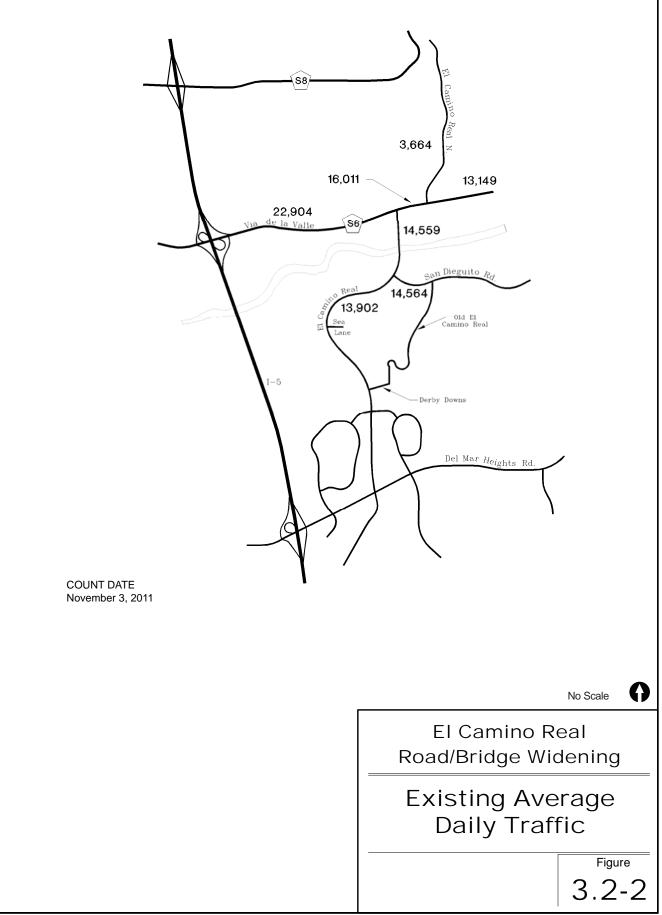
There are no measures to mitigate for the impacts of the Bicycle Safety Alternative on hazards to pedestrians. These impacts of the Bicycle Safety Alternative remain unmitigable.

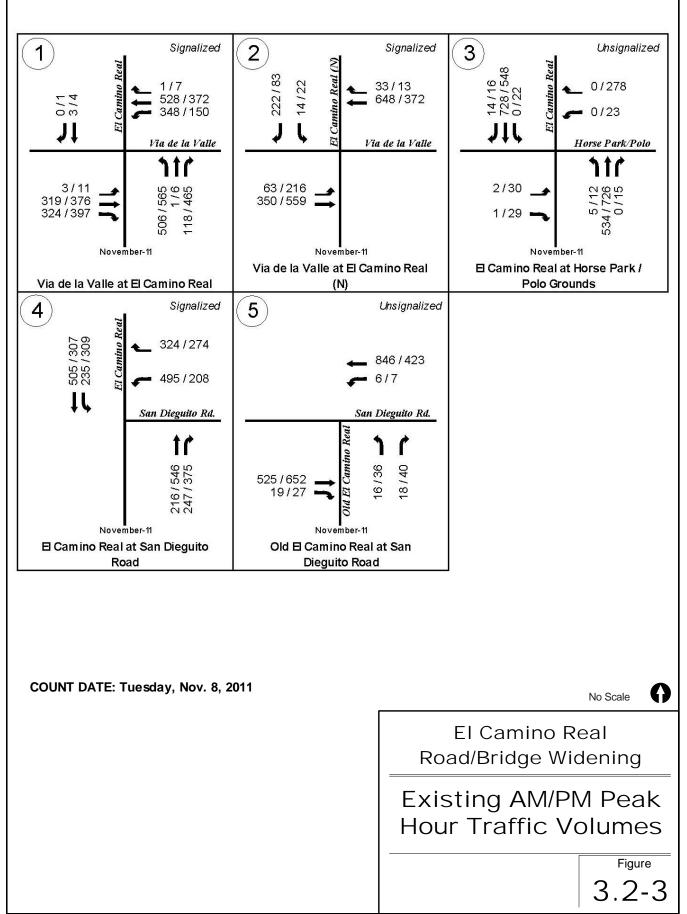
Impact	Threshold	Central	Road Capacity	Bicycle Safety	Western	Eastern	Round- about	Lower Elevation	No Build
Short-term LOS	Worsening of short-term LOS above acceptable limits	NS	NS	NS	NS	NS	NS	NS	NS
Long-term LOS	Worsening of long-term LOS above acceptable limits	NS	NS	NS	NS	NS	NS	NS	NS
Traffic hazards	Increase in hazards due to non-standard design	NS	SU	SU	NS	NS	NS	NS	NS
Consistency with General Plan and/or community plan	Inconsis-tency would cause the roadway to not properly align with other roadways	NS	NS	NS	NS	NS	NS	NS	NS
Access	Substantial restriction in access	NS	SU	NS	NS	NS	NS	NS	NS
Parking	Substantial reduction in available parking	NS	NS	NS	NS	NS	NS	NS	NS

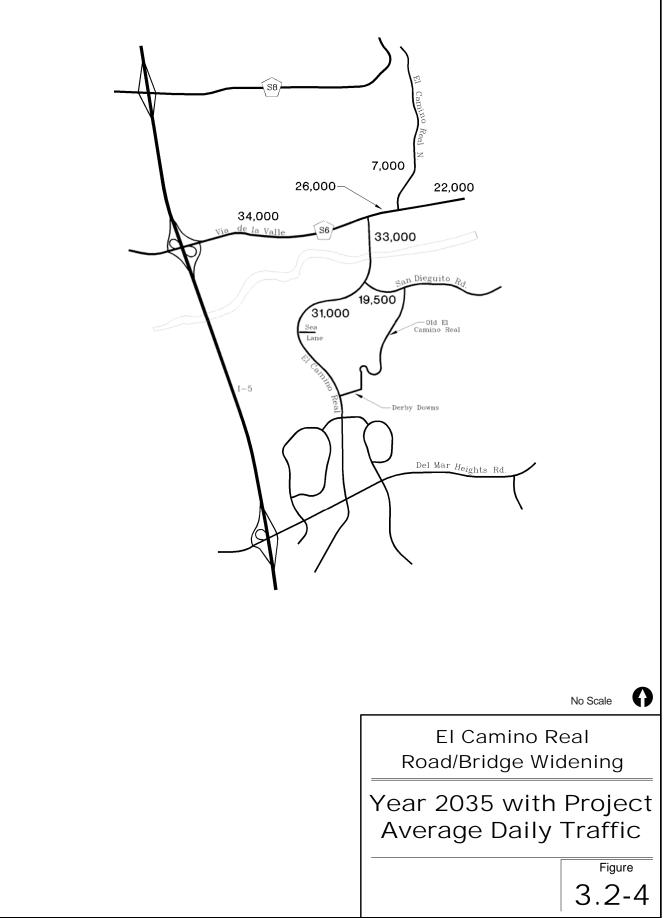
Table 3.2-14 Summary of CEQA Significance for Traffic/Circulation Impacts

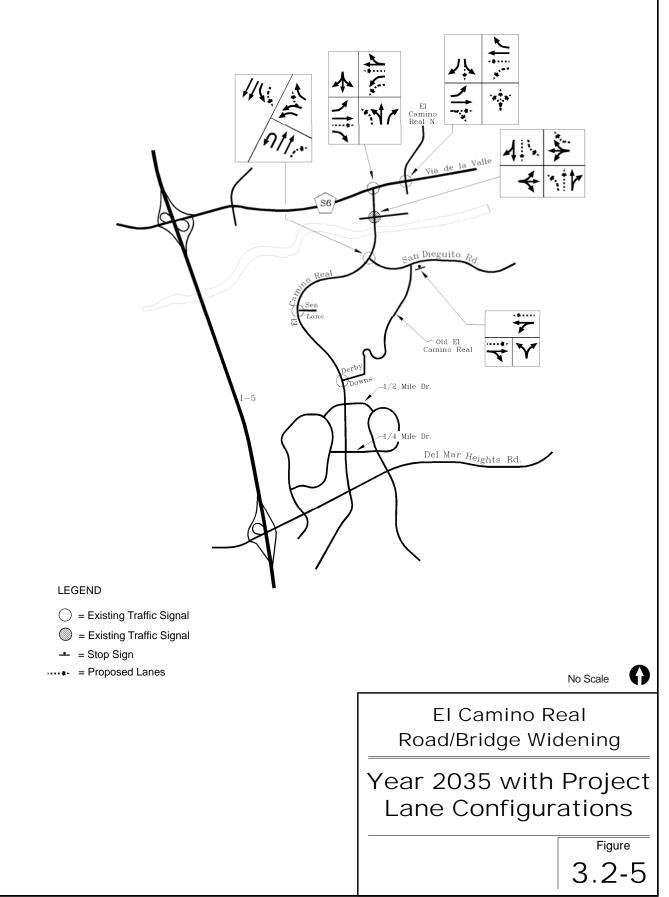
NS = Not significant SM = Significant and mitigable to below a level of significance SU = Significant and unmitigable

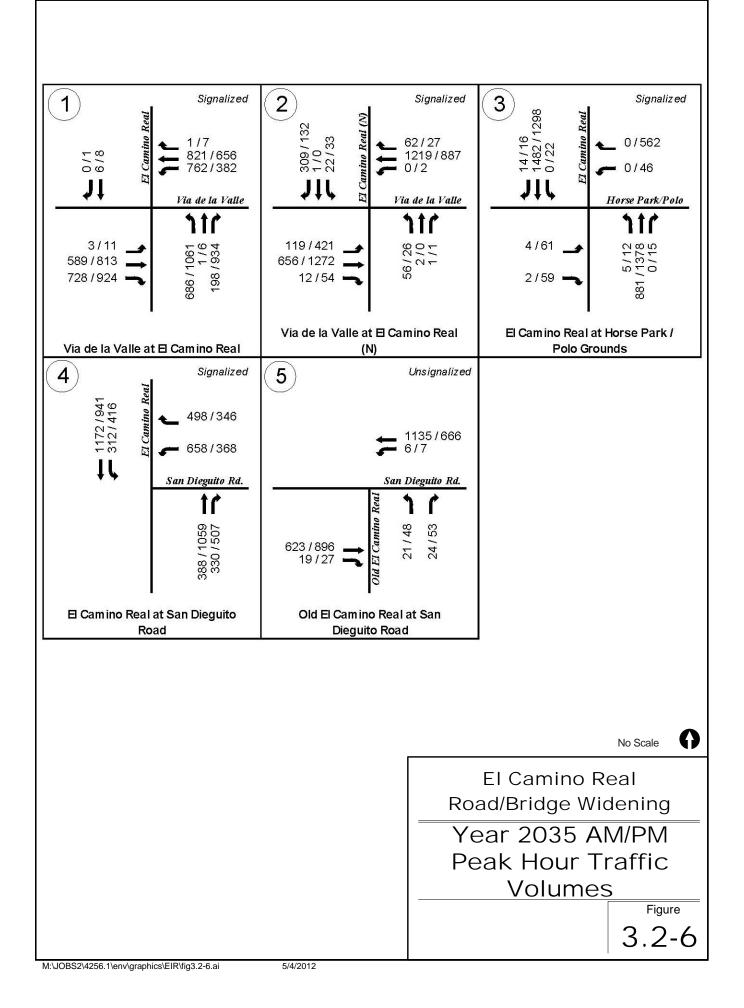












3.3 VISUAL/AESTHETICS

This section evaluates the visual and aesthetic impacts of various components of the action alternatives, including the new bridge over the San Dieguito River (with various heights and widths), and the raised and widened roadway (with side slopes or retaining walls). Because of these components, the project alternatives have a potential for visual quality impacts. This section of the recirculated EIR identifies the existing visual character and the quantity and sensitivity of potential viewers seeing the proposed project. This section also analyzes visual impacts and describes the consideration given to design quality in planning various project components and mitigations.

3.3.1 Definitions, Methodology, and Regulatory Setting

A number of terms used in the analysis are defined below.

3.3.1.1 Visual Quality

The visual quality of an area is based on the aesthetic character of the area, defined by physical and perceptual quality factors. Physical character factors are the physical elements present in the area. The combination of physical elements creates the visual framework of a particular view.

Physical character factors include:

- Landform the shape or mass of the landform; often defined by edge and outline.
- **Vegetation** distinct plant communities (grassland, scrub, riparian, etc.), which differ from one another in appearance.
- Water the appearance of water in its many forms: clear, calm, flowing, rolling, etc.
- **Color** the appearance of light that enables the viewer to differentiate otherwise identical objects through differences in chroma, value, or hue.
- **Diversity** variety in landscape character; a function of the number of various elements and the intermixing of these elements.

3.3.1.2 Perceptual Quality

Perceptual quality factors are the viewer's perception of visual quality. These perceptions are based upon a viewer's cognitive assimilation of landscape elements into a memorable landscape image, distinguishable from other landscapes within the region.

Perceptual quality factors include the following:

- **Vividness** the memorability of landscape components as they combine in striking and distinctive visual patterns.
- **Intactness** how well a visual scene appears to match its original natural or manmade composition without major changes or disturbances. This definition is important since an intact visual scene is always contrasted more highly than a scene that is not intact.
- Unity a proportionate arrangement of form, line, color and texture; a blend of harmonious elements with those that vary.
- **Visual Organization** the way individual elements are composed and fit with other elements to make an organized composition. Chaotic arrangements of elements that do not relate at all to each other are considered to have poor visual organization.

- **Scarcity** the frequency of occurrence of a view within a region.
- Adjacent Scenery an area at the edge of a person's cone of vision that affects one's perception of the area viewed.
- **Cultural Modifications** man-made improvements that either add or detract from the character of an area.

3.3.1.3 Visual Character Units

An area that has a definable boundary with similar character, is defined as a visual character unit. Each unit can be classified as having a particular visual quality and sensitivity to change.

Visual character units with a high visual quality may include physical characteristics such as landforms with high vertical relief; a variety of vegetative types with different forms, colors, textures and patterns; the presence of clear or cascading water; numerous colors in the soil, rock, vegetation or water; and many visually different elements. A high perceptual quality would include a balanced composition of line, form, color and texture; striking visual patterns or the presence of distinct focal points; enhancement from the adjacent scenery; the absence of cultural modifications or, if present, compatibility with the character of the landscape setting; and a unique or visually scarce setting within the region.

Moderate visual quality is based on interesting, but not dominant or exceptional landforms; one or two major types of vegetation; the presence, but not dominance of water; three to five colors in the landscape; and three to five different visual elements. The perceptual quality factors would include a varied, but unbalanced composition; perceivable, but not striking patterns created by the landscape elements; moderate enhancement from the adjacent scenery; the presence of cultural modifications which do not detract from the landscape setting; and a setting that is distinct but similar to others within the region.

Areas with a low visual quality may have the following physical characteristics: few or no interesting landforms; few vegetation types; the absence of water; few color variations; and few undifferentiated elements within the setting. Low perceptual quality may have the following factors: a varied, but chaotic appearance; elements that appear random with no perceivable patterns; adjacent scenery that detracts or has little influence on the scenic quality; cultural modifications that detract from the setting; and an interesting setting that is common within the region.

3.3.1.4 Visual Sensitivity to Change

Visual sensitivity is based on the ability of a particular area to absorb changes in the character or quality resulting from new elements. Specific design elements that determine the ability to absorb changes within the visual character unit include:

- Form the shape or structure of an element.
- Line an intersection of two planes or the silhouette of a form such as landforms, the skyline and structures.
- Color contrast a diversity of color that enables one to differentiate similar objects.
- Texture the interplay of light and shadow created by variations in the surface of an object.
- Intactness the visual integrity of the natural and man-made landscape and its freedom from encroaching elements.

A visual character unit with a high sensitivity to change may contain the following elements: a single dominant form; curvilinear lines; a dominant mono-color and texture; and undisturbed natural features. Highly sensitive areas are those where the proposed improvements would be very visible and would produce a contrasting negative visual impact. To minimize the impacts, the existing area and proposed improvements should be compatible in terms of texture, line, variety, contrast, intactness and unit.

A visual character unit with a moderate sensitivity to change may have many similar forms; naturally geometric lines; a consistent variety of color contrasts; and a consistent variety of textures creating perceivable patterns. The intactness of the area may be disturbed.

A visual character unit with a low sensitivity to change may have many different forms; manmade geometric lines; an overwhelming variety of color contrasts and textures in a chaotic pattern; and scarred by the introduction of man-made elements. Areas with a low sensitivity to change typically have a lower visual quality, and the addition of elements will not create any significant impacts on the overall appearance of the area.

3.3.1.5 Visual Study Methodology

To enhance compatibility with the NEPA process and separate EA, the visual analysis for this EIR was based on the methodology presented in *Visual Impact Assessments for Highway Projects* (FHWA 1988). This methodology involves evaluating the visual environment by describing the resources and character of an area and the potential viewer response to changes in that visual environment. Visual character and quality are important aspects of defining visual resources and the sensitivity to change. Field inspection and photography were used in the analysis of visual resources. Visual assessment units were mapped to describe areas of similar character and sensitivity to change. A computer viewshed landform model was created to determine the visibility of the project to potential viewer groups in the area. Viewer exposure and viewer sensitivity are determinates in viewer response. The assessment of viewer characteristics was based on an evaluation of typical viewer location, activity, and values. Visual simulations of the action alternatives were prepared to assist in the evaluation of the degree of change. A determination as to the adversity of visual changes was then made. Methods to mitigate adverse visual impacts were also developed.

The State of California, through the *California Environmental Quality Act*, Appendix G of the CEQA Guidelines states that "a project will normally have a significant effect on the environment if it will ... (a) conflict with adopted environmental plans and goals of the community where it is located; and (b) have a substantial, demonstrable negative visual effect." CEQA Section 15064 (b) states that "...the significance of an activity may vary with the setting ... an activity which may not be significant in an urban area may be significant in a rural area." This statement is particularly applicable to the determination of the significance of a visual effect.

Guidelines developed by the Association of Environmental Planners (AEP) and the American Society of Landscape Architects (ASLA) identify visual impacts as those projects that would block public views from designated open space, roads, or parks to significant visual landmarks or scenic vistas (the ocean, downtown skylines, mountains, waterways, wide open distant views etc.). To meet this significance threshold, one or more of the following conditions should apply:

- The project would substantially block a public view through a designated public view corridor as shown in an adopted Community Plan, the General Plan, or the Local Coastal Program. Minor view blockages would not be considered to meet this condition.
- The project would cause "substantial" view blockage of a public resource (such as the ocean) that is considered significant by the applicable community plan.
- The project exceeds the allowed height or bulk regulations, and this causes unnecessary view blockage.
- The project would have a cumulative effect by opening up a new area for development, which will ultimately cause "extensive" view blockage.

3.3.1.6 Regulatory Setting

The governing documents related to visual issues are the NCFUA Framework Plan and the City General Plan. Relevant policies and principles are summarized below. Consistency of the various alternatives with the General Plan is discussed in detail in Section 3.1: Land Use, of this recirculated EIR. The North City LCP is another governing document that contains policies related to visual issues. Conformance with the Local Coastal Program also was discussed in Section 3.1, and summarized in Table 3.1-6. No visual corridors in the study area have been identified in the North City Local Coastal Program (City of San Diego 1981) or the Revisions to the North City Local Coastal Program Land Use Plan Segment (City of San Diego 1988).

The NCFUA Framework Plan (City of San Diego 1995) Visual and Scenic Resources map indicates that the project area west of El Camino Real and south of Via de la Valle is in the San Dieguito River Basin and is identified as an "Area of High Scenic Value." The Framework Plan also states that environmental tier lands shall be designated open space. The Draft Framework Plan Diagram indicates that project area lands generally west of El Camino Real and north of San Dieguito Road are classified as a NCFUA Environmental Tier.

Guiding Principles for urban design in the Framework Plan state:

4.1f-The many canyon and valley views are primarily local, short range views that can be seen from existing public roads, public open spaces and private lands. The location of the freeway, streets and roads throughout the study area will effectively "open up" an extensive network of public view corridors.

Implementing Principles for the street system in the Framework Plan note the following as guidance:

"The network of visual sequences experienced from the street system will be the most visible part of the environment and will give continuity to the spatial experience of the landscape's interconnected canyons, valleys, mesas and hillsides."

"The key viewsheds of the NCFUA should play an important role in the design of the paths of movement. Two types of viewsheds exist. First are views to the numerous canyons and valleys of the area. They are both close up and distant, with occasional opportunities for long view corridors along the larger canyon and valley systems. Second are the wide panoramic views across the area to distant natural features, including the Pacific Ocean and Black Mountain."

"The new system of roads will greatly increase public opportunities to view the landscape from a variety of vantage points. At the same time, the road system has the potential to disrupt natural features and block public views of the landscape. The most significant issue is the alignment of State Route 56."

"The most panoramic views across the NCFUA are toward the west, north, and northeast. These views are experienced from the upland mesas and hillsides, especially from elevations above 300 feet."

The specific Implementing Principles for the street system in the Framework Plan include the following:

- 4.9b-Development should give special attention to the design of street edge conditions, strengthening the landscape character of buildings and open spaces as viewed from the street.
- 4.9c-Where streets cross the open space system, bridge structures should be used to cross canyons.
- *Figure 4-12c-Create a landscaped parkway along all major arterial and collector streets. Design the street edge to retain land forms, mature trees and other natural features.*

Implementing Principles for development adjacent to significant natural areas include the following:

4.10f-Development should not obstruct public views.

Implementing Principles for development within the San Dieguito River Valley Regional Open Space Park Focused Planning Area include the following:

4.10n-All exterior lighting shall be a low-sodium type with horizontal cut-off and shall be shielded downward such that the light would not be visible to the adjacent properties and the proposed park.

The 2008 General Plan includes several elements with references to views. The Conservation Element (CE), the Recreation Element (RE), and the Urban Design Element (UD) all reference public views of open space and other natural features. Specific statements from these elements include:

- CE-B.1. Protect and conserve the landforms, canyon lands, and open spaces that: define the City's urban form; provide public views/vistas; serve as core biological areas and wildlife linkages; are wetlands habitats; provide buffers within and between communities; or provide outdoor recreational opportunities.
- *CE-C.8.* Protect coastal vistas and overlook areas from obstructions and visual clutter where it would negatively affect the public's reasonable use and enjoyment of the resource.
- RE-F.2. Provide for sensitive development of recreation uses within and adjacent to Cityowned open space lands.

a. Include only those development features and amenities that do not encroach upon or harm the feature or resource that inspires the open space or resource-based park.

b. Design and maintain open space lands to preserve or enhance topographic and other natural site characteristics.

c. Preserve designated public open space view corridors, such as views to the Pacific Ocean, other bodies of water, and significant topographic features.

UD-A.3. Design development adjacent to natural features in a sensitive manner to highlight and complement the natural environment in areas designated for development.

l. Protect views from roadways and parklands to natural canyons, resource areas, and scenic vistas.

n. Provide public pedestrian, bicycle, and equestrian access paths to scenic view points, parklands, and where consistent with resource protection, in natural resource open space areas.

The Local Coastal Program (City of San Diego 1981 and 1988) does not identify any visual corridors within the project study area, or present specific policies related to public viewshed that pertain to the proposed project.

3.3.2 Affected Environment

Visual impacts are relative to the visual setting in which they occur. Visual impacts can extend beyond the physical areas that result in disturbance. Visual quality and views are interrelated elements occupying the same three-dimensional space, each space affecting the adjacent space. To account for this dynamic phenomenon, an understanding of the viewshed, visual character, viewer groups and the surrounding visual environment is needed.

3.3.2.1 Overall Visual Setting

As noted in the NCFUA Framework Plan, the project area has high scenic value. Landform varies from the steep terraced hillsides north of Via de la Valle, to the flat floodplain east and west of El Camino Real, to the San Dieguito River incised through the valley floor. Views from I-5, major arterials, public spaces and private property are all very dramatic and of a high quality. Within the broader valley of the San Dieguito River, a balance of natural open space and landforms still exists with man-made development. The presence of open water, natural landforms and the distant ocean, all combine to provide a high quality visual setting, unique in the San Diego region (see Photos 3.3-1 through 3.3-2).

3.3.2.2 Visual Character Units

Landcover in the immediate study area includes water periodically found in the San Dieguito River and drainage ditches parallel to Via de la Valle and El Camino Real. Prominent vegetation includes two mature Torrey Pine trees on the south side of Via de la Valle, just west of the intersection with El Camino Real (outside of the project impact area); landscaping along the commercial development on the north side of Via de la Valle at and east of the intersection with El Camino Real; planted turfgrass in the Polo Club fields, marsh in the drainage ditches, riparian vegetation in the San Dieguito River, and fallow fields west of El Camino Real and south of the river. Manmade development includes the parking lots and commercial buildings associated with the veterinary offices and Mary's Tack and Feed west of El Camino Real and south of Via de la Valle, parking lots and 1- and 2-story office and commercial buildings east of El Camino Real and north of Via de la Valle; equestrian facilities on Horsepark west of El Camino Real; bleachers and small structures on the Polo Club grounds east of El Camino Real; the roads; and the bridge over the San Dieguito River.

The project specific character units range in size from a few acres up to dozens of acres. In certain instances, the edge between visual character units is dramatic, while in others it is transitional. Each visual character unit can be described and qualitatively analyzed by its visual quality and visual sensitivity (see Figure 3.3-1). The visual character units within the project study area and vicinity are summarized on Table 3.3-1. Character units located directly adjacent to the project site include 10 definable units. Representative photographs of each assessment unit are presented in Photos 3.3-3 through 3.3-12.

3.3.2.3 Project Viewshed Limits

A viewshed is the physical area that can see the proposed prominent visual project elements. The major factor affecting visibility is the presence or absence of intervening topography that physically makes it impossible to see a specific area. The viewshed has been developed through the creation of a computer model denoting the existing landform of the area. Six points along the roadway were developed in the computer model to indicate the relative elevation of the proposed project. The elevations of these six points were determined from preliminary engineering plans and integrated into the viewshed landform model. Every point within a several square mile area was then analyzed by the computer to determine if a line of sight was possible to these six points. The resulting viewshed map (see Figure 3.3-2) was generated. This viewshed map represents the theoretical worst-case scenario for visibility, since intervening vegetation and structures further decrease the visibility of the area. Also, major changes in landform can result in some areas that currently see the site to not be able to see it, or others that currently cannot see the site could be made to see it.

Visua	al Character Unit	Visual Quality	Visual Sensitivity	
А	El Camino Real roadway unit project area	Moderate	Moderate	
1	Via de la Valle development	Moderate	Low	
2	Open unimproved property (private)	Low	Low	
3	Polo Fields	Moderate to High	Moderate	
4	San Dieguito River and streambanks	High	High	
5	Golf Course	Moderate	Moderate	
6	Unimproved vacant parcels around intersection	Low	Low	
7	Fallow fields	Moderate	Moderate	
8	Horse Park	Moderate	Low	
9	Via de la Valle mixed commercial area	Moderate	Low	
10	Via de la Valle open space hillsides	Moderate to High	High	

Table 3.3-1 Visual Character Units Adjacent to the Study Area

3.3.2.4 Viewer Groups

There are two basic kinds of viewer groups: <u>users</u> who have views <u>from</u> the project, and <u>users</u> who have views <u>of</u> the project. Viewer groups are listed in Table 3.3-2.

Existing and future users with views from the project include the following:

- Drivers on El Camino Real (bridge & transitional roads)
- Bicyclists on the project roadway
- Pedestrians on the project roadway
- Equestrian users on the bridge cantilever trail

For this project, users with views of the project include the following:

- Drivers on adjacent roadways within view of the project components including I-5, San Dieguito Road, Via de la Valle and various other local and neighborhood roads
- Visitors to the area who are parking for special events related to the fair, or horse racing that are parking remotely in the overflow parking areas of Horsepark
- Visitors to the recreation facilities in the project area, including Horsepark, the fields on City-owned property leased for polo and soccer, and the golf course
- Bicyclists on trails, roads and bicycle paths near the project area
- Hikers and equestrians on trails near the project area
- Equestrians crossing under the bridge or at the proposed Horsepark/Polo Club signal
- Workers and visitors at the commercial businesses at the northern end of the project
- Workers and tenants associated with the Horsepark facility
- Workers at Polo Club fields or golf course
- Residents in homes north of Via de la Valle
- Residents in homes south of San Dieguito Road

Table 3.3-2 Viewer Groups within the Viewshed Limits of the Project

Viewer	Group					Viewing
Group	ID	Quantity	Distance	Views	Sensitivity	Duration
Single-family	А	Moderate	Moderate	Of the Project	High	12-14 hours
Residential					-	daily
Agricultural Worker *	В	Low	Close	Of the Project	Low	6-10 hours daily
Retail Worker	С	Low	Close	Of the Project	Low	6-10 hours daily
Retail Customers	D	Moderate	Close	Of the Project	Moderate	5 minutes to an hour
Recreational Trail User **	Е	Low	Close	Of the Project	High	5 to 15 minutes
Recreational Field User	F	Moderate	Close	Of the Project	High	1-4 hours
Recreational Golfer	G	Low	Close	Of the Project	Moderate	5 minutes to an hour
Cyclists & Pedestrians	Н	Low	Close	Of the Project	Mod. to high	1-2 minutes
Local Drivers	Ι	Moderate	Close	From the Project	Moderate	A few seconds
Arterial Drivers	J	Moderate	Moderate	Of the project	Moderate	A few seconds to a few minutes
Freeway Drivers	K	High	Distant	Of the Project	Moderate	A few seconds

* Agricultural workers include employees of the Horse Park, the Polo Fields, or the golf course

** This viewer group will increase in the future when the adjacent trail system

3.3.2.5 Viewer Exposure and Sensitivity

In general, the viewer group with the highest sensitivity to view quality impacts is that of the residential owner. A resident has the longest exposure of the view and as a property owner, they have the vested interest and great concern over impacts to their investment.

Another sensitive viewer group would be the recreational user that is participating in a trail activity or wildlife viewing. These viewers are participating in this type of activity to specifically view the natural and cultural resources of the area. Recreational trail users would have closer views of the bridge and elevated roadway, and their long-range views to the east and west could be affected by the road embankments or retaining walls, depending on the alternative.

Drivers are typically concerned about changes in the visual environment. Those that are driving for scenic interest are more concerned. Those driving for work related commuting are generally less concerned. Viewing durations can increase or decrease the effect on the viewer. The same can be said about distance. For example, though the total number of viewers is greatest from the freeway, the distance and length of viewing duration is such that this group is practically unaffected by the project, no matter how much it may contrast with the setting.

The sensitivity of viewers is related to viewer activity, awareness, and values. A person driving in heavy traffic will have a different perspective than a person driving for pleasure or relaxing in scenic surroundings. The receptivity of a viewer to his/her surroundings can be affected by the scene itself. A change from one type of character unit to another in the viewshed can heighten awareness.

3.3.2.6 Viewer Response

The people using existing and future recreational trails would be expected to have the highest sensitivity to change. The ultimate number of these viewers using trails of the San Dieguito River Park is unknown, but could be moderate. This group would be sensitive to their view of the elevated road and bridge, which would be in the foreground as they approach these project elements. This group would also be sensitive to how their regional view would be affected by the road embankments or retaining walls, either of which could block westward views for travelers on the east side of the road. The existing trail along the north bank of the San Dieguito River and the southern edge of the Polo Club field property is shown in Figure 1-2. The Coast to Crest Trail exists along the entire southern edge of Horse Park to El Camino Real. Currently, there is no Coast to Crest Trail JPA trail-on the west side of the bridge; however, the JPA is coordinating with the 22nd District Agricultural Association in planning a trail that would continue westward along the north bank of the San Dieguito River.

The viewer group with the next highest sensitivity to change would be visitors to the recreational facilities such as Horsepark and fields used by Polo Club and soccer players (as well as golfers on the adjacent golf course), who are greater in number but slightly lower in sensitivity, since they are involved in active recreation or sport observation, not there solely for enjoying the surrounding natural setting like trail users are.

Another viewer group with a moderate to high sensitivity to change encompasses the people bicycling or walking on the future bike lanes/walkways along El Camino Real (for those alternatives with such elements). This group would be sensitive to views of the road and bridge features that they are traversing, as well as the regional view from their viewpoint.

Residents in the homes north of Via de la Valle would be highly sensitive to change, although they are relatively few in number. Residents to the south of the project site are farther away from the project and slightly lower in elevation. Both locations of residents are positioned above the project thereby making an overview of the project very apparent, but the scale of the improvements less apparent. Also, the direction of views tend to be down the roadway itself, as opposed to looking at the side of the bridge where scale and form of the bridge is much more obvious and potentially impactive.

The greatest number of users or neighbors of the proposed project would be drivers who are passing through the area to and from their homes. Many drivers outside of peak traffic hours could be visiting the businesses in the area. The sensitivity of the drivers' viewer group is expected to be low, because viewers should be maintaining a narrow cone of vision focused on surrounding traffic and the business/facility to which they are driving. Modifying this generally low sensitivity would be the fact that the project area is an acknowledged scenic area with long-range vistas that even drivers focused on their travels may enjoy.

3.3.3 Visual Analysis

Changes in the physical environment resulting from the project would include raising and widening of El Camino Real roadway, replacement of the bridge with a higher and wider structure, slopes associated with grading, planting of vegetation on these slopes, retaining walls, bridge abutments and rip-rap slopes as well as roadway widening along Via de la Valle east to the northern extension of El Camino Real.

Changes that will be perceived visually are more limited than the full list of physical changes proposed in the project. The more visually prominent elements include the surface of the bridge, the profile of the bridge structure and railings, the bridge supports, the bridge abutments, the cantilevered equestrian trail structure and fence, side slopes, removal of vegetation and the introduction of new elements such as trees, light poles, roadway signs and barriers.

The changes to visual resources generated by each of the alternatives would be different in each character unit and would vary for different key views. FHWA guidance (FHWA 1988) notes that the actual or potential compatibility of a project with its landscape setting can be objectively evaluated by examining the compatibility of pattern elements (form, line, color, and texture) and compatibility of pattern character (dominance, scale, diversity, and continuity). Anticipated compatibility of project elements in the existing viewshed for each key view is discussed below.

3.3.3.1 Views

A view is made up of three components; a viewing location where one is situated to see the view, the viewing corridor that is looked through and the viewing scene that is being looked at. There are an almost infinite number of viewing locations, view corridors and viewing scenes. Visual quality studies are intended to concentrate on public viewing locations of regionally or sub-regionally significant views and the corridors needed to be kept open from these viewing locations. A sub-regionally significant viewing scene is one that is not common in the region and includes a visual character that is intact, unique, harmonious, diverse, and has a high visual quality rating. The overall visual setting of the San Dieguito River Valley is considered to be both regionally and sub-regionally significant. Therefore, any blocking of the view corridor by the project that would affect a public view of the view scene would be considered a significant impact. If the project site is part of the viewing scene, then any change of the viewing scene would also be considered to be an impact.

Though the project bridge is an element that could significantly block a public view of the viewing scene, there are no current public views afforded in the project vicinity that would be blocked by the bridge. This is due to two primary reasons: First, all significant public views of the area are elevated and distant views are of a much broader landscape; and secondly, a bridge already exists in the area. Though the proposed bridge would be higher, it would not significantly change the dynamics of the viewing corridor as seen from the San Dieguito River and its streambank area. It should be noted that a public view does exist from the bridge deck itself. Since the blocking of view corridors or the elimination of a public viewing location are not going to result from this project except potentially from on the bridge, the focus of the analysis will be on the viewing scene itself.

3.3.3.2 Candidate Key Views

Key views in each viewshed were selected for the dominant viewer groups in each character unit. These views are considered to be "Candidate Key Views" and are listed in Table 3.3-3 and presented in Photos 3.3-13 through 3.3-35. The locations of these candidate key views are mapped on Figure 3.3-3.

The term "views" describing "key views" in this section do not necessarily equate to the subregionally significant public views discussed above. They are used here in a generic sense since key views are focused on the project elements and their effect on the visual quality of the adjacent setting. Often, a view looking towards the project area will be part of a viewing scene that may be regionally or sub-regionally unique and important.

Based on fieldwork and viewshed analysis, the key views were identified and then categorized as to the types of view that the project may have an effect on. Key views 1, 2, 9, 10, 11, 13, and 14 are all locations where a more distant view of the project will occur and the project will appear to be part of the viewing scene. However, key views 4, 5, 7 and 16 are all viewing location spots with more distant viewing scenes where the project elements may affect the viewing corridor. Key views 3, 6, 8, 12, 17, 18, 20, 21, 22, and 23 are close in views where the project elements will be the focus of the view and the adjacent viewing scene is much less dominant to the viewer. Finally, key views 15 and 19 are actually taken from the viewing location and the project elements, with the exception of the mitigation area, are not seen. The views from 15 and 19 do include views of sub-regionally important viewing scenes and are part of canyon, river and valley views indicated in the NCFUA Framework Plan. These views are currently limited to drivers, walkers and cyclists along El Camino Real, as they crown over the bridge itself. Future trail users of the JPA trailCoast to Crest Trail system would have their views looking west (key view 4 and 16) already blocked by the existing bridge, therefore, the changed condition of a new bridge is likely to have similar view blockage by the bridge as seen from this future trail alignment. Views looking east (key view 6, 7, and 17) have been identified in the NCFUA to include distant hills in addition to the valley floor, though these views from these locations are already blocked by the existing bridge. Viewers in the location of key views 6, 7 and 17 already have these views affected by the existing El Camino Real bridge.

3.3.3.3 Recommended Key Views for Simulation

After evaluating the candidate key views and analyzing the probable changes, the viewer groups, the viewing duration and the viewer sensitivity, nine key views were recommended to be used for the production of visual simulations (see Table 3.3-3).

Key View #/ Photo #	Character Unit Taken From	Dominant Viewer Group	Distance	Notes	Recommended for Simulations
1 3.3-13	#1	Single family resident	Background	Too distant for potential significant affect Retaining wall project versions would be visible though.	No
2	#10	Single family resident	Background	Similar to KV #1 except would see west side of improvements more than east.	No
3.3-14 3	"A"	Local Road Driver, Cyclists & Pedestrians	Middleground	Represents best keyview for roadway user for those going to polo fields, horsepark & from Via de la Valle.	Yes
3.3-15 4	#3	Ag Worker, Trail User, Rec. Field User	Foreground	Limited number of viewers but includes the most sensitive viewer groups (trail & Rec. field viewer)	Possible Backup
3.3-16 5	#3	Ag Worker, Trail User, Rec. Field User	Foreground	KV #4 is better since it covers trail & rec. field viewer groups	Possible Backup
3.3-17 6	#8	Ag. Worker, Recreational Field User	Foreground	Good combination for trail, ag. Worker and horse park visitor viewer groups	Yes
3.3-18 7	#4	Rec. Trail user	Foreground	Good perspective from trail user viewpoint and would show walls well	Possible Backup
3.3-19 8	"A"	Local Driver, Arterial Driver, Cyclists & Peds.	Middleground	Represents good keyview for roadway user for those going to polo fields, horsepark & from San Dieguito Road	Possible Backup
3.3-20 9	#6	Ag. Worker, Arterial Driver	Middleground	Distant profile shot would provide overall surface view but no bridge forms	No
3.3-21 10	NA	Single Family Resident, Arterial Driver	Middleground	Too distant, project would not be that noticeable	No
3.3-22 11	NA	Single Family Resident	Background	Too distant, project would not be that noticeable	No
3.3-23 12	"A"	Single Family Resident	Background	Too distant, project would not be that noticeable	No
3.3-24 13	#5	Single Family Resident	Background	Too distant, project would not be that noticeable	No
3.3-25 14	NA	Single Family Resident	Background	Too distant, project would not be that noticeable	No
3.3-26 15	"A"	Local Road Driver, & Cyclists (Future Hikers/ Equestrians)	Foreground	Best view to show affect of railing on views of the river and valley	Yes
3.3-27 16	#4	Ag Worker, Trail User, Rec. Field User	Foreground	Good representative view as seen by trail users and rec. field users	Yes
3.3-28 17	#8	Ag Worker, Trail User, Recreational Field User	Foreground	Foreground views showing walls as seen by future trail users & horse farm visitors	Yes
3.3-29 18	"A"	Local Road Driver, Cyclists & Pedestrians	Foreground	Best representative view of retrofitted use of bridge	Yes
3.3-30 19 3.3-31	"A"	Local Road Driver, & Cyclists (Future Hikers/ Equestrians)	Middleground	Foreground and middleground view of proposed pond mitigation areas	Yes
20 3.3-32	"A"	Retail Customers, Retail Workers, Local Road Driver, Cyclists &	Foreground	Too distant, project would not be that noticeable	No
21 3.3-33	#2	Retail Customers, Rec. Field User, Retail Workers, Local Road Driver, Cyclists & Pedestrians	Middleground	Too distant, project would not be that noticeable	No
22 3.3-34	"A"	Retail Customers, Retail Workers, Local Road Driver, Cyclists & Pedestrians	Middleground	Most direct view of foreground and middleground changes and transitions for roadway widenings	Yes
<u>3.3-34</u> 23	#1	Retail Customers, Retail Workers, Local Road Driver, Cyclists &	Foreground	Best view for intersection changes in foreground and middleground	Yes

Table 3.3-3: Candidate Key Views and Recommendations for Simulations (see Figure 3.3-3)

3.3.4 Impacts

The State of California, through Appendix G of the CEQA Guidelines, states "a project will normally have a significant effect on the environment if it will ...

- conflict with adopted environmental plans and goals of the community where it is located; and
- have a substantial, demonstrable negative visual effect."

Issues to be addressed are the following:

How would the project affect the visual quality of the area, especially with regard to views from public roadways and public open space?

The discussion of potential visual impacts is based on the questions in the current CEQA Guidelines and thresholds in the City of San Diego Significance Determination Thresholds (City of San Diego 2011). Impacts result when the visual elements of the project contrast with the existing visual setting as shown on the visual simulations in Figures 3.3-4 through 3.3-17. Although a project element has to contrast with the visual setting in order for there to be a negative impact, it also has to be seen by at least a moderate number of viewers likely to be sensitive to this change.

3.3.4.1 Visual Simulation Summary

Simulations have been prepared to test the amount of contrast that each of the proposed alternatives would have with its visual environment and what effect it would have on existing visual resources and views. Many of the project alternatives are similar to each other and a special simulation was not warranted where no noticeable differences in visual changes are expected. The right side of the simulations also includes descriptions of the project elements and an overall rating of the existing quality and character of the site. A summary of the expected contrasts has also been included in the right column of the figures. Visual simulations utilized for visual analysis are as follows:

- Visual Simulations #1 (Figure 3.3-4) and #2 (Figure 3.3-5) depict the general view of the proposed roadway from a viewpoint at the driveway to Horsepark looking south. Visual Simulation #1 depicts the full widened roadway footprint alternatives in the general alignment of existing El Camino Real, and Visual Simulation #2 reflects the narrow roadway alternatives. (A simulation of the Eastern Alignment from a northern point looking south is presented in Visual Simulation #13. Because the Eastern Alignment is shifted eastward to intersect Via de la Valle at De la Valle Place, this simulation is taken at a different key view location.)
- Visual Simulation #3 (Figure 3.3-6) is a simulation of the bridge for the Eastern Alignment and Roundabout alternatives.
- Visual Simulations #4 (Figure 3.3-7), #5 (Figure 3.3-8), #6 (Figure 3.3-9), and #7 (Figure 3.3-10) represent the proposed bridge from the trail east of the river looking southwest for the various alternatives.
- Visual Simulation #8 (Figure 3.3-11) depicts the bridge railing and fencing that would result from the proposed cantilever equestrian trail that could be installed by others along the western edge of the new bridge for all alternatives.
- Visual Simulation #9 (Figure 3.3-12) depicts the road embankment slopes in a mature landscaped condition for the full widened roadway alternatives except for the Eastern and

Roundabout alternatives. The road embankment slopes for those two alternatives would appear similarly but would be farther away from the key view location.

- Visual Simulation #10 (Figure 3.3-13) depicts the vertical retaining walls of the narrow footprint alternatives, with proposed landscaping in place.
- Visual Simulation #11 (Figure 3.3-14) depicts the proposed wetlands mitigation concept from the viewpoint at the location of the existing bridge. This is not a potential viewpoint because it is approximately 6 feet lower than the proposed bridge would be for most of the build alternatives, but the simulation roughly represents an unobstructed view of the change in the area from fallow fields to the proposed mitigation concept. See Visual Simulation #8 for the general appearance of the mitigation concept through the fencing that would be needed for the cantilever equestrian trail.
- Visual Simulation #12 (Figure 3.3-15) presents widened Via de la Valle from the intersection with El Camino Real North, looking westward.
- Visual Simulation #13 (Figure 3.3-16) depicts the Eastern Alignment Alternative from De la Valle Place looking southward.
- Visual Simulation #14 (Figure 3.3-17) depicts the Roundabout Alternative from De la Valle Place looking southward, using the same key view as a basis.

Contrast Summary. Each of these simulations are described below. The contrast summary presents visual conclusions based on the simulation.

Figure 3.3-4: Visual Simulation #1 was based on the Lower Elevation Alternative. The proposed Central Alignment Alternative is basically the same as this simulation, though a slight crown to the roadway would be seen. Refer to Figure 3.3-5: Simulation #2 for the proper crown in the road for the Central Alignment Alternative. The Western Alignment Alternative is also similar to the Lower Elevation Alternative since it has the same lane geometry, bike lanes and walkways and has the same overall width. The only difference is that the limits of disturbance of the slope and the overall alignment would be slightly shifted to the west, closer to the existing white picket fence shown on Simulation #1.

Contrast Summary: The overall visual quality and character is not affected as shown by Simulation #1. Though the scale of the road has changed, it is not out of scale with other elements in the area. The simulation assumed that some street trees would be added along each side of the new roadway. These elements help to soften the overall improvements and effectively lower the scale of the road, making it feel similar to the existing condition.

Figure 3.3-5: Visual Simulation #2 was specifically developed with the geometry associated with the Road Capacity Alternative. Note that the painted stripe on each side of the road is a striped shoulder, not a Class 2 bike lane. This same simulation can be used for the Bicycle Safety Alternative with the exception that there would only be two travel lanes (one in each direction) and a wide median as well as a striped Class 2 bike lane on each side. Though this simulation does not show it, these two alternatives would have retaining walls on each side of the road edge. The particular angle of the simulation does not allow the face of these retaining walls to be seen.

Contrast Summary: The overall visual quality and character is not affected as shown by Simulation #2. Though the scale of the road has changed, it is not out of scale with other elements in the area. Though not shown, the retaining walls associated with the Road Capacity and Bicycle Safety alternatives would be considered to contrast with the existing visual quality and character (see Simulation #9 and Simulations #10). The project railing system for the roadway leading up to the walls associated with the bridge deck is proposed to be standard galvanized metal rails. The dominance of this rail system in the immediate visual

environment would contrast dramatically with the white wood rails and fencing along this stretch of the highway. Simulation #2 demonstrates how the visual aesthetics of the environment can be improved by using a white wood-appearing rail system instead of the standard galvanized railing.

Figure 3.3-6: Visual Simulation #3 was based on the Eastern Alignment Alternative. The simulation shows the Eastern Alignment and Roundabout alternatives new bridge on the left side of the simulation and the existing bridge removed. This simulation also shows a view of the proposed mitigation wetland area proposed for the project in the middle and right side of the simulation.

Contrast Summary: The overall visual quality and character would change. Though some views to the east would be blocked by the development of the new bridge, these views were limited to road drivers that would be traveling on the new bridge with increased views to the east and west. The character associated with the bridge railing on the existing bridge would be lost. Visibility of the rip-rap used for the bridge abutments and for the mitigation/revegetation site to the south would be obvious and would also be considered highly contrasting with the existing setting.

Figure 3.3-7: Visual Simulation #4 covers the Central Alignment and Western Alignment alternatives. It differs only slightly from that of Simulation #5, where the north abutment of the bridge is located farther north and out of the edge of the simulation and the south abutment would be more visible because it is farther north as well.

Visual Simulation #4 includes a proposed mitigation measure on the photo. A wood-appearing barrier railing system has been shown to help offset the look of a "New Caltrans Standard Bridge". This standard bridge would look very different than the historic-appearing existing bridge. If an open rail were possible, it would afford views of the river and fit with the original character of the bridge as well as match some of the more prevalent materials and design themes in the area. If the railing has to be engineered as part of a K-rail, the benefit of seeing through the rail would not be as great but the overall visual character would still be improved. The mitigation rail shown on Visual Simulation #4 can be used on all of the bridge variations.

Contrast Summary: Though the bridge is larger in width, it does not appear dramatically bigger than the existing bridge shown at the bottom of Simulation #4. The proposed bridge does not contrast with other elements around it, though in comparison with the existing bridge, the character has changed from an historic- and unique-looking bridge to a modern common-looking bridge. This contrast is considered to have an impact on the existing visual character of the area. Note that the simulation shows the mitigation proposed to offset this impact. Removal of vegetation and other disturbances related to construction are assumed to be mitigated by new revegetation efforts as required by mitigations specified in Section 3.12 (Biological Resources) of this EIR. The removal of a large stand of Eucalyptus and Sycamore trees at the location of the river edge, northward towards the polo fields is considered to be a high contrast to the existing character of the area and would be considered a loss of visual resources that currently contribute to the site character. This impact would result from the Central Alignment Alternative but not the Western Alignment Alternative.

<u>Figure 3.3-8: Visual Simulation #5</u> should be used for the Road Capacity and Bicycle Safety alternatives. Note the greater prominence of the bridge abutment shown to the left of the image. Though this makes the impact associated with this element seem greater, the other alternatives would have similar abutments and effects on the visual quality and character of the area.

Contrast Summary: As with Simulation #4, though the bridge is larger in width, it does not appear dramatically bigger than the existing bridge, but the character has changed from an historic and unique-looking bridge to a modern, more common-looking bridge. This contrast is considered to have an impact on the existing visual character of the area. The simulation does not show the mitigation of wood railing illustrated in the previous simulation to offset this impact. Removal of vegetation and other disturbances related to construction are assumed to be mitigated by new revegetation efforts as required by mitigations specified in Section 3.12: Biological Resources, of this recirculated EIR.

Figure 3.3-9: Visual Simulation #6 should be used to review the Eastern Alignment and Roundabout alternatives. The Eastern Alignment Alternative would appear closer to the viewer than for the Central Alignment and Western Alignment alternatives, and the south side of the abutment would not be visible to the viewer. Also, the Eastern Alignment and Roundabout alternatives would remove the grove of eucalyptus and sycamore trees partially shown at the extreme right of the image in Simulations #4 and #5.

Contrast Summary: Though the bridge is larger in width, it does not appear dramatically bigger than the existing bridge shown at the bottom of the simulation. The proposed bridge does not contrast with other elements around it, though in comparison with the existing bridge, the character has changed from an historic and unique-looking bridge to a modern, more common-looking bridge.. This contrast is considered to have an impact on the existing visual character of the area. The simulation shows the mitigation of wood railing proposed to offset this impact. Removal of vegetation and other disturbances related to construction are assumed to be mitigated by new revegetation efforts as required by mitigations specified in Section 3.12: Biological Resources, of this recirculated EIR. The removal of a large stand of eucalyptus and sycamore trees at the location of the river edge, northward towards the polo fields, is considered to be a high contrast to the existing character of the area and would be considered a loss of visual resources that currently contribute to the site character.

<u>Figure 3.3-10: Visual Simulation #7</u> should be used to review the Lower Elevation Alternative. Note that the height of the bridge over the river is slightly lower and that the views of the distant lagoon and river are slightly less.

Contrast Summary: Only a minor difference is noted between Simulation #4, and #7. A greater amount of view is seen under the higher bridge alternatives. To most viewers in the area, no perceptible difference would exist. The impacts to the existing character would be the same as discussed in Visual Simulation #4. The removal of a large stand of eucalyptus and sycamore trees at the location of the river edge, northward towards the polo fields, is considered to be a high contrast to the existing character of the area and would be considered a loss of visual resources that currently contribute to the site character.

Figure 3.3-11: Visual Simulation #8 applies to all project alternatives. Though the actual position of the bridge is slightly different among alternatives (including horizontal and vertical differences) the variation is almost negligible in comparing visual impacts as seen from this location looking through the proposed cantilever fence system. The simulation shows the inclusion of a railing barrier and fence that would be required for all alternatives if a cantilever equestrian trail is installed. All of the build alternatives would provide for the ability of other entities to construct a cantilever trail extending from the western side of the new bridge. The cantilever would enhance connectivity, but views to the west for travelers on the bridge would be

impaired by the chain link fencing that is proposed to be 8 feet high in order to protect equestrians riding on the cantilever equestrian trail.

Contrast Summary: The equestrian fence as proposed is considered to have an impact on a public viewing corridor since it interrupts the view of the San Dieguito River from the perspective of drivers, walkers, and cyclists using the bridge. The views are considered to be sub-regionally important and have been identified in the NCFUA as important view resources found in the valley. Since the viewers who would see this view are located mostly on the southbound side of the bridge, they would be moving as they see this view.

<u>Figure 3.3-12: Visual Simulation #9</u> should be used in conjunction with the Central Alignment, Western Alignment, and Lower Elevation alternatives. This simulation shows the likely view and its effects on future trail users as well as visitors to Horsepark utilizing the dirt parking lots.

Contrast Summary: The overall scale and height of the proposed bridge is perceived as being greater than the current bridge. This difference, however, is not completely out of character with the area and the heightened bridge actually provides greater viewing opportunities of the river as seen under the bridge. As seen on the left side of the simulation, the proposed project slopes created by the road embankment would be perceived differently than the current condition, but project landscaping along these slopes would greatly reduce the apparent height of the slope. No long-term impacts to the visual character, quality, or views of the area would be expected from this vantage point.

<u>Figure 3.3-13: Visual Simulation #10</u> should be used in conjunction with the Road Capacity and Bicycle Safety alternatives. Similar to Simulation #9, the simulation shows the view and its effects on future trail users as well as visitors to Horsepark utilizing the dirt parking lots.

Contrast Summary: The overall scale and height of the proposed bridge is perceived as being much greater than the current bridge. Unlike Simulation #9, the difference between the existing condition and the proposed condition is dramatic and it does introduce a scale and negative aesthetic effect resulting from the large retaining walls. On the other hand, impacts to eastward views up the valley are not affected and may actually be improved due to the heightened nature of the bridge.

Figure 3.3-14: Visual Simulation #11 should be used in conjunction with all project alternatives since this simulation shows the mitigation site for biological impacts that would be required for all alternatives. Basically, the agricultural look of this area would be changed to a wetland condition with greater diversity in vegetation and the appearance of water instead of fields. However, it should be noted that this view would only be possible without the cantilever and associated fencing. Also, because the key view photograph was taken from the existing bridge, the simulation is actually 3 to 6 feet lower than an unobstructed view from a new bridge would be, depending on the alternative. The view from the bridge for the Eastern Alignment or Roundabout alternatives would be from farther to the east, but not substantially different.

Contrast Summary: The changes proposed for the mitigation site are mostly a conversion of one type of character with another. Though a potential impact would be associated with the removal of vegetation and the creation of riprap berms needed to protect some of the wetlands and maintain river sedimentation patterns, the extensive landscape and biological plantings proposed for this area would eventually offset the potential impact associated with the berms. Short-term impacts would be associated with the berms, but a revegetation and monitoring program for screening and creek revegetation would eventually (within

approximately 5 years) hide the rip-rap berm. No long-term impacts would be associated with this project element.

<u>Figure 3.3-15: Visual Simulation #12</u> depicts the road widening changes proposed to Via del la Valle associated with this project. All project alternatives would create these changes to the north end of the project study area, although the changes would be more apparent with the Roundabout Alternative because the alignment would be moved farther south to provide appropriate transitions at the intersection of Via de la Valle and El Camino Real North.

Contrast Summary: The changes proposed by all project alternatives in this area of the project site are minimal and not out of character with the surrounding area. No impacts to the visual character, quality or views of the area would be expected from this vantage point.

Figure 3.3-16: Visual Simulation #13 depicts the changes associated with the Eastern Alignment at Via de la Valle. Though the other project alternatives are likely to change the visual character in and around the intersections of El Camino Real and Via de la Valle, they are not as potentially dramatic as changes with a new intersection created by the Eastern Alignment (except for the Roundabout Alternative, as discussed below).

Contrast Summary: Though the changes shown on the simulation do represent a contrast with the existing setting, the changes are not perceived to be out of character with the immediate area nor do they introduce a negative aesthetic. Some of the existing character of foreground agricultural edges to the roadway and background views of the polo fields would be changed as a result of the proposed alignment. Assuming that the project would contain tree plantings along this stretch of the roadway, the project changes are not that dramatic and would be reduced with the inclusion of the street plantings as shown on the simulation.

<u>Figure 3.3-17: Visual Simulation #14</u> depicts the changes associated with the Roundabout Alternative at Via de la Valle. Though the other project alternatives are likely to change the visual character in and around the intersections of El Camino Real and Via de la Valle, the changes created by the Roundabout Alternative at De la Valle Place are the most dramatic.

Contrast Summary: Roundabouts are not common in the area and intersections are generally at right angles to each other. Though the proposed form would be different, it is not antagonistic to the free flowing shapes of local landforms, the San Dieguito River or the golf courses of the area. The aesthetics of the roundabout can either be good or bad, depending on the treatments and extent of blank pavements. It is assumed by this study that the central portion of the roundabouts will contain a quantity of trees and low growing ground cover, at least in the central circle of the roundabout. In addition, it is assumed that street trees along the approaching roads will be included. Though a roundabout often contains more overall pavement surfaces, if these surfaces are punctuated by at least a moderate level of plantings, then aesthetic impacts would not occur.

3.3.4.2 Visual Impact Levels

The visual impacts of project alternatives are determined by assessing the visual resource change due to the project and predicting viewer response to that change. The resulting level of visual impact is determined by combining the severity of resource change with the degree to which people are likely to oppose the change. Visual impact levels are defined below.

- None or Not Applicable No adverse change to the existing visual resource is expected to be noticeable or the change may be considered to be an overall improvement to the visual environment. Does not require mitigation.
- Low or Slightly Adverse Minor adverse change to the existing visual resource, with low viewer response to change in the visual environment. Does not require mitigation.
- **Moderately Adverse** Moderate change to the visual resource with moderate viewer response. Impact considered less than significant, but can be reduced to slightly adverse through mitigation. Impact can be fully mitigated within five years using conventional practices.
- Moderately High Adverse Moderate visual resource change with high viewer response or high adverse visual resource change with moderate viewer response. This impact could be considered significant but mitigable. However, extraordinary mitigation measures may be required, and if not practicable, the impact may not be mitigable. Landscape treatments required will generally take longer than five years to mitigate.
- High Adverse A high level of adverse change to the resource or a high level of viewer response to visual change such that architectural design and landscape treatment cannot mitigate the impacts. Viewer response level is high. An alternative project design may be required to avoid highly adverse impacts. Otherwise, this impact is considered to be significant and unmitigable.

3.3.4.3 Impact Discussion

The following discussion presents the results of visual impacts first in terms of general visual issues from the CEQA Guidelines Initial Study Checklist for aesthetics, and then in terms of City Significance Thresholds of Views, Neighborhood Character/Architecture, Development Features, and Light and Glare. City Thresholds for landform alteration do not apply to the project, even though the project would alter more than 2,000 cubic yards of earth per graded acre by either excavation or fill for the following reasons:

- The project would not disturb steep hillsides.
- The project would create manufactured slopes higher than ten feet or Steeper than 2:1 (50 percent), but the proposed fill to create higher slopes (or vertical walls) is necessary to permit installation of a non-typical roadway which would reduce the project's overall grading requirements.
- The project would not result in a change in elevation of steep hillsides.
- The project design does not include mass terracing of natural slopes with cut or fill slopes in order to construct flat-pad structures.

Table 3.3-4 summarizes the conclusions regarding visual impact levels for each of the alternatives in terms of the issues analyzed.

IMPACT ISSUE AREA	Central	Road Capacity	Bicycle Safety	Western	Eastern	Round- about	Lower Elevation
1. General Aesthetics							
a) Change Quality of Current	М	Μ	Μ	Μ	Μ	Μ	Μ
Scenic Area							
b) Damage Scenic Highway	Ν	Ν	Ν	Ν	Ν	Ν	Ν
Resources							
c) Degrade Visual Character	MH	MH	MH	MH	MH	MH	MH
(Bridge railing)							
c) Degrade Visual Character	Ν	Ν	Ν	Ν	Ν	Ν	Ν
(Utility Lines)							
c) Degrade Visual Character	MH	М	Μ	L	MH	MH	MH
(From tree removal or walls)							
d) New Source of Light & Glare	Ν	L	L	Ν	Ν	Ν	Ν
2. Views							
a) Block a View Corridor	MH	MH	MH	MH	MH	MH	MH
(Fence Obstruction)							
a) Block a View Corridor	Ν	Ν	Ν	Ν	Ν	Ν	L
(Bridge Obstruction)							
b) Block a View of Public	MH	MH	MH	MH	MH	MH	MH
Resource (Fence obstruction)							
c) Exceed Height / Bulk	Ν	Ν	Ν	Ν	Ν	Ν	Ν
Designations							
d) Cumulative View Blockage	Ν	Ν	Ν	Ν	Ν	Ν	Ν
3. Neighborhood Character							
a) Exceed Bulk & Height of	N	М	М	N	N	N	N
Adjacent Area							
b) Stark Contrast with Area	L	L	L	L	L	L	L
Bldg. Materials or Styles							
c) Result in Loss of Landmarks	N	Ν	N	Ν	N	Ν	N
identified in Community Plans	-						
d) Strongly Contrast with	N	М	М	Ν	N	Ν	N
Adjacent Development							
e) Have a Cumulative Effect on	N	N	N	N	N	Ν	N
Óverall Character							
4. Development Feature							
a) Create a Disorganized	N	N	Ν	Ν	Ν	Ν	N
Appearance							
b) Conflict with Height	N	Ν	Ν	Ν	Ν	Ν	N
Regulations							
c) Include Walls above 6 feet	N	М	М	Ν	Ν	Ν	Ν
5. Light & Glare							
a) Visible Increase of 30% in	Ν	L	L	Ν	Ν	Ν	Ν
Reflectivity							
b) Shed New Ambient Light	Ν	Ν	Ν	Ν	Ν	Ν	Ν
into Nighttime Sky				Advarsa M			

 Table 3.3-4

 Summary of Impacts of Build Alternatives

N= No Adverse Impact or Not Applicable, L= Low or Slightly Adverse, M= Moderately Adverse, MH= Moderately High Adverse, H= High Adverse

Issue 1. General Aesthetics (CEQA Initial Study Checklist Questions) - would the project:

(a) *Have a substantial adverse effect on a scenic vista?* All project alternatives would result in a **moderately adverse** impact to the visual quality of the river resources resulting from the disturbance of plant material in the river corridor during bridge construction. This impact is considered temporary since revegetation of the construction easement (the area disturbed by construction but not by the permanent features of the project) would be included as a part of the project mitigations under the biological impact mitigations. See the wetlands planting plan in Section 3.12.5 for details on proposed revegetation in the river. All project alternatives are part of a sub-regionally important viewing scene (valley, river and wetlands) and would result in a change of this viewing scene. However, the scale of the bridge and other project elements compared with the scale of the viewing scene and the presence of an existing bridge and roadway system results in changes that are considered to be a **moderate impact** on this scenic vista. This impact category is different from potential impacts to the blocking of a view corridor or a removal of a viewing location. This impact category only concerns itself with the potential effect on a viewing scene.

Alternatives Affected for Issue 1a: All build alternatives.

- *Impact 1a Significance:* Moderately adverse visual scene change resulting from the removal of the vegetation that constitutes a visual resource that makes up the current visual character of an important public view (as indicated in the NCFUA) of the San Dieguito River as seen from the existing and proposed bridge during construction.
- *Duration of Impact:* Short-term (1-3 years).
- *Mitigation 1a:* A revegetation program is proposed to plant native riparian and wetland species that would match the current character of the area. This program would require the preparation of a revegetation plan prepared by a biologist and a landscape architect. Monitoring and maintenance would be required for a 5-year period to assure that the visual quality change has been fully mitigated, although the vegetation is expected to establish for visual purposes within 3 years.
- *Impact after Mitigation 1a:* No impact would remain with the implementation of the proposed mitigation.
- (b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings and historic buildings within a state scenic highway? A scenic highway or roadway does not exist in the immediate area that would be affected by the project. The project would have no impact on existing scenic highways since none exist in the area.
- (c) Substantially degrade the existing visual character or quality of the site or its surroundings? This issue has four parts. First, a moderately high adverse impact would occur as a result of the change of the character of the current bridge structure to the proposed bridge form and detailing. The current character is determined by the extensive use of white wood railing for barriers. This railing edge provides for a clear and open view of the river and denotes a particular style that is not commonly found in newer bridges. The character of the existing bridge is consistent with many roadway and smaller highway bridges built in the 1940s to 1960s. The bridge would be changed to mostly concrete barrier materials with simple, modern and clean lines. This form of bridge is very common on the majority of highways and freeways. The overall scale of the bridge would also change, adding to the contrast between the new and the old bridge (see Figures 3.3-7 through 3.3-10: Simulations #4 through #7). In addition, the alternatives on embankments would result in the creation of slopes that are much larger in scale than

what is found around existing bridges of this era and in the immediate areas, thereby affecting the visual character of the area.

Alternatives Affected for Issue 1c(1): All build alternatives.

- *Impact 1c(1) Significance:* A moderately high adverse visual character change would result from the change in the character of the bridge and the change in scale associated with the heightened nature of the bridge and its abutments.
- Duration of Impact: Permanent
- *Mitigation 1c(1):* The only mitigation possible for this adverse impact would be the redesign of the railing system that would integrate the concrete barrier requirements of a K-rail with those commonly associated with a wood rail barrier. The barrier would include a steel backed wood-appearing faced railing barrier. The railing should have a dominant horizontal look and be painted white to match the existing rails (as well as many other fence rails found in the area). Other changes to the form of the bridge, the scale and the extensive use of concrete are not warranted or possible due to the latest design and safety criteria. See Figure 3.3-7 to see the proposed mitigated version for the build alternatives. A Type ST-40 railing could also be used as an optional treatment. This Caltrans-approved standard railing type would be more consistent with the existing rural character and would allow for higher visibility through the railing, especially as seen from the roadway.
- *Impact after Mitigation 1c(1):* No impact would remain with the implementation of the proposed mitigation.

Second, all of the build alternatives would affect the existing overhead power poles parallel to the southern edge of Via de la Valle, and all of the build alternatives except the Eastern Alignment and Roundabout alternatives would affect the overhead power poles parallel to El Camino Real. Where overhead power lines would be affected, it is assumed for this analysis that they would be relocated to an appropriate location along the new road edge, and would remain part of the visual landscape, as under existing conditions. For the Eastern Alignment and Roundabout alternatives, the power poles parallel to existing El Camino Real would not have to be relocated because the new alignment for El Camino Real would be several hundred feet to the east. Relocating the poles and lines would have a similar effect on the visual character of the area as the existing poles. Therefore, **no impact** is considered to occur from relocating power poles, for issue 1c(2).

Third, the Central Alignment, Eastern Alignment, Roundabout, and Lower Elevation alternatives would have a **moderately high adverse** effect on a portion of what is considered to be a scenic vista. The Polo Fields are considered to be part of an identifiable view scene and are rated as having a Moderate to High Visual Quality and a Moderate Sensitivity to Change (see Table 3.3-1). The view scene, though not natural, is considered to be unique since it provides a very flat and green area not common in San Diego County. The impact can be seen on the simulation as shown on Figure 3.3-6: Simulation #3. The primary impact is associated with the removal of the fence, row of non-native trees, the grove of eucalyptus trees and the three large sycamores.

Alternatives Affected for Issue 1c(3): Central Alignment, Eastern Alignment, Roundabout, and Lower Elevation alternatives

- *Impact 1c(3) Significance:* Moderately high adverse visual scene change resulting from the removal of visual resources that make up the current visual character of an important public view, specifically the Polo Fields as seen from the existing and proposed bridge.
- *Duration of Impact:* Short-term (1-3 years)
- *Mitigation 1c(3):* The best method for mitigating this impact would be avoidance. The limits of disturbance line are very close to where the majority of these trees and the fence already occur. Adjustments to the alignment and / or limits of slope might be enough to avoid the majority of the impact.

If the impact is not addressed through realignment, then the following mitigation is required. A revegetation program is proposed to mitigate these impacts. This program would require the preparation of a revegetation plan prepared by a landscape architect. Monitoring and maintenance would be required for a 5-year period, which is a standard protocol for establishment purposes of a restored area to ensure that success criteria are met.

In order to provide a visually comparable tree massing within 3 to 5 years, the eucalyptus tree grove (assumed to be 12 trees) and the sycamore grove (assumed to be 3 trees) are proposed to be replaced at a 3:1 ratio (based on the mature size of the trees removed) utilizing varying container sizes up to 36-inch box trees for a total of 45 new trees. These trees are proposed to all be sycamore, even though many of the existing trees are eucalyptus. They shall be planted in a grove-like arrangement near the river, on each side of the bridge abutment, in a pattern that emulates a naturalized condition.

In order to provide a visually comparable tree massing within 3 to 5 years, the row of trees along the fence (assumed to be 30) are proposed to be replaced at a 3:1 ratio for a total of 90 new 24-inch box trees. The row trees are proposed be planted as part of the parkway planter area (25-35 feet on center) and along the slope and reclaimed area of the removed roadbed. The parkway trees would be planted in a clustered, informal manner in accordance with City landscaping guidance.

The fence itself is proposed to be reconstructed on each side of the new alignment. The entry gate into the Polo Fields is also proposed be replaced at the new entry to the Polo Fields.

• *Impact after Mitigation 1c(3):* Only a short-term adverse impact would exist under this category if the mitigation is provided. There would be no long-term impact once the trees grow to a mature size, generally considered to be 5 years.

Fourth, the Road Capacity and Bicycle Safety alternatives would have a **moderately adverse** impact on the current Visual Character of the area because of the large scale walls that would appear along the east and west side of the roadway. These concrete walls are contrary to the scale and character of the area and would be viewed by several sensitive viewing groups including trail users, and recreational field users (polo, soccer and Horsepark)

Alternatives Affected for Issue 1c(4): Road Capacity and Bicycle Safety alternatives

- *Impact 1c(4) Significance:* A moderately adverse impact associated with large-scale walls is expected with these alternatives.
- *Duration of Impact:* Permanent

- *Mitigation 1c(4):* The moderately adverse impact would be mitigated through the use of colored and textured concrete (if poured in place concrete is used) or alternating split face block with integral color (earth tone recommended) if Concrete Masonry Units (CMU block) are used. In addition, a landscape plan would be prepared by the project Landscape Architect that includes the use of vegetation that would be placed in front of the wall, consisting of approved City trees and shrubs.
- *Impact after Mitigation 1c(4):* No impact would remain with the implementation of the proposed mitigations.

(d) *Create a new source of substantial light or glare, which would adversely affect day or night-time views in the area?* None of the project elements from the project alternatives would generate substantial light nor would they effectively increase the level of glare to a substantial level. Low pressure sodium type lighting would be provided in conformance with City standards and their placement would be limited to intersections, where they are not considered to be substantial light sources that would affect views in the area. An increase in the level of glare is likely to occur related to the retaining walls associated with the Road Capacity and Bicycle Safety alternatives. The walls that are west facing next to the Horsepark are more likely to reflect higher levels of glare based on afternoon sun angles and intensities, in the condition of bare concrete faced walls. This natural grey cement color reflects most of the direct light that hits the surface and would be substantially greater than the current vegetated swales found on each side of the existing roadbed. However, given the lack of sensitive glare receptors in the dirt parking lot, and the intensity of the glare from the concrete walls, only a **low adverse** impact can be expected for these two alternatives. There would be **no impact** for the other build alternatives.

Issue 2. Views (City Threshold 1a-1d) - would the project:

(a) Substantially block a view through a designated public view corridor as shown in an adopted Community Plan, the General Plan or Local Coastal Program? This issue has two parts. First, all project alternatives have been analyzed as including the equestrian cantilever for a trail and fence on the bridge, although the cantilever would not be installed until funding is identified. The proposed equestrian cantilever would require the use of an 8-foot-high fence to protect equestrian users in accordance with JPA's requirements for equestrian trails above steep drop-offs. This 8-foot-high chain link fence would block the westward view of San Dieguito River as seen from the vehicular driver's perspective. The view would also be blocked from the perspective of cyclists and pedestrians, as well as equestrian users themselves (though if riding on horseback they are likely to see over it). This view blockage is of a view scene that is considered to be a regionally significant view. The view blockage can be seen on Figure 3.3-11: Simulation #8. The NCFUA Framework Plan (City of San Diego 1995) Visual and Scenic Resources map identifies the area westward of the affected El Camino Real segment as an "Area of High Scenic Value." All alternatives would have a moderately high adverse impact resulting from the new fencing that would block the view of the San Dieguito River from drivers, pedestrians, equestrians and cyclists using the bridge.

Alternatives Affected for Issue 2a(1): All build alternatives

- *Impact 2a(1) Significance:* A moderately high adverse impact associated with a blocked view corridor of an important visual scene would occur.
- Duration of Impact: Permanent

- *Mitigation 2a(1):* The moderately high adverse impact cannot be mitigated because the fence cannot be lowered substantially due to the structure of the bridge, and the barrier cannot have more than 4-inch openings per current safety standards.
- *Impact after Mitigation 2a(1):* The impact would remain significant under CEQA.

Second, all build alternatives would place a structure across the river that could block views looking east up the valley along the center of the river. Currently, potential views are blocked by the existing bridge. There is no trail west of the existing bridge at this time, although a trail is planned by the JPA as part of the Coast to Crest Trail. In all cases, the project alternatives would create a bridge that is 3 feet higher than the existing bridge (Lower Elevation Alternative) or 6 feet higher (all other build alternatives), the new bridge would be clearer underneath than the current condition because there would be fewer piers, and the piers would be cylindrical in shape versus pier walls. Therefore, the proposed bridge would have less of a potential view blockage than the current bridge. **No impact** to public view corridors would occur for this aspect of issue 2a(2) for the build alternatives except for the Lower Elevation Alternative, which would have a **low adverse** impact on the view corridor under the bridge.

- (b) Cause substantial view blockage from a public viewing area of a public resource (such as the ocean) that is considered significant by the applicable Community Plan? Same response as 2a(1) above. The project would have a moderately high adverse impact on views of public resources. The view blockage of the public resources would be of the San Dieguito River from the bridge blocked by the proposed equestrian cantilever trail fence for all the build alternatives.
- (c) *Exceed the allowed height or bulk regulations and would this excess result in a substantial view blockage from a public viewing area?* No height restriction exists for the bridge structure. Therefore, **no impact** is expected.
- (d) Have a cumulative effect by opening up a new area for development, which will ultimately cause extensive view blockage? The project would not have any cumulative effect on future growth that would cause view blockage of public views identified in the NFCUA or determined to exist within the project study area. The public views to be potentially blocked with adjacent development are related to views of the river and the lagoon. However, development is restricted in these areas from occurring because of the floodway channel and floodplain. Therefore, no cumulative impact associated with cumulative development is expected for the public views in this area.

Issue 3. Neighborhood Character / Architecture (City Threshold 2a-2e)- would the project:

(a) *Exceed the allowed height or bulk regulations and the height and bulk of the existing patterns of development in the vicinity of the project by a substantial margin?* No development regulation would apply to the proposed bridge, therefore no impacts are expected under this category. However, the proposed concrete walls associated with the Road Capacity and Bicycle Safety alternatives would exceed the typical wall heights and scales of structures found within the valley adjacent to the project site. Therefore, a **moderately adverse** impact associated with neighborhood quality would result from these alternatives.

Alternatives Affected for Issue 3a: Road Capacity and Bicycle Safety alternatives

- *Impact 3a Significance:* A moderately adverse impact associated with contrasts with the existing scales of the area.
- **Duration of Impact:** Permanent
- *Mitigation 3a:* Same as mitigation for 1c(4). The moderately adverse impact would be mitigated through the use of colored and textured concrete (if poured in place concrete is used) or alternating split face block with integral color (earth tone recommended) if Concrete Masonry Units (CMU block) are used. In addition, a landscape plan would be prepared by the project Landscape Architect that includes the use of vegetation that would be placed in front of the wall, consisting of approved City trees and shrubs.
- *Impact after Mitigation 3a:* No impact would remain with the implementation of the proposed mitigations.
- (b) Have an architectural style or use building materials in stark contrast to adjacent development where the adjacent development follows a single or common architectural theme (eg: Gaslamp Quarter, Old Town)? Though an extensive amount of concrete would be used in the structure of the bridge, it would not be considered in stark contrast to existing materials, and with the exception of wood or vinyl white rail fencing, no other material is dominant in the immediate vicinity. Though the project does have a moderately adverse to moderately high adverse impact to the character of the site (issue 1c), it is not because the proposed materials are in stark contrast with adjacent materials that are perceived to be dominant in the area. The dominance of steel and concrete associated with the building materials of the project would produce a low adverse impact. This impact is considered to be low because there are no dominant building materials in the area that this would be contrary to.
- (c) Result in the physical loss, isolation or degradation of a community identification symbol or landmark which is identified in the General Plan, applicable Community Plan or Local Coastal Program? No local symbols or landmarks are affected by any of the project alternatives. The project would have no impact on landmarks in the area.
- (d) Be located in a highly visible area and would strongly contrast with the surrounding development or natural topography through excessive bulk, signage or architectural projections? The proposed bridge elements would not strongly contrast with the existing setting since the area already includes a bridge of generally similar scale. The new bridge would be approximately the same length as the existing bridge and approximately 3 feet higher (Lower Elevation Alternative) or 6 feet higher (all other build alternatives). The new bridge would have fewer piers, and they would be more open, because the existing bridge has pier walls and the new bridge would have cylindrical columns. The project alternatives would have no impact on the character of adjacent development due to the bridge. For the Road Capacity and Bicycle Safety alternatives, however, the vertical retaining walls would contrast with surrounding topography even though the bridge itself would not have a contrasting impact. These two alternatives would have a moderately adverse impact on neighborhood character due to their vertical wall element.
- (e) Have a cumulative effect by opening up a new area for development or changing the overall character of the area? No cumulative growth inducing effect is expected by the replacement of the existing bridge with a new bridge from any of the project alternatives. Widening El Camino Real and Via de la Valle would enable these transportation facilities to accommodate existing and future projected traffic and would not open any new areas

to development or change the overall character of the area since the roads would be widened within the existing road corridors. The project would have **no cumulative impacts** to the overall character of the area.

Issue 4. Development Features (City Threshold 4a-4c)- would the project:

- (a) *Create a disorganized appearance and substantially conflict with city codes?* The proposed project elements are very organized and aesthetically balanced and none of the proposed alternatives would create a disorganized appearance. **No impacts** are expected under this issue.
- (b) *Conflict with the height, bulk or coverage regulations of the zone and does not provide architectural interest?* There are no zoning regulations or other criteria that would apply to a bridge project in this area, therefore this issue does not apply to any of the alternatives. **No impacts** are expected under this issue.
- (c) Include crib, retaining or noise walls greater than six feet in height and 50 feet in length with minimal landscape screening or berming where the walls would be visible to the public? The Road Capacity and Bicycle Safety alternatives would require retaining walls as high as 11 feet above existing street level from the north edge of the new bridge for about 500 feet northward, and as high as 10 feet to 6 feet above existing street level for another 850 feet northward. Therefore, the retaining walls for these two alternatives would exceed the 6-foot height guideline and would have an overall length of more than 50 feet. These walls would be visible to the general public from the trail, polo fields, golf course and parking lot of Horsepark. A moderately adverse impact is expected with these two alternatives.

Alternatives Affected for Issue 4c: Road Capacity and Bicycle Safety alternatives

- *Impact 4c Significance:* A moderately adverse impact associated with the negative aesthetic of walls greater than 6 feet is expected to occur with these alternatives.
- Duration of Impact: Permanent
- *Mitigation 4c:* Same as mitigation for 1c(4). The moderately adverse impact would be mitigated through the use of colored and textured concrete (if poured in place concrete is used) or alternating split face block with integral color (earth tone recommended) if Concrete Masonry Units (CMU block) are used. In addition, a landscape plan would be prepared by the project Landscape Architect that includes the use of vegetation that would be placed in front of the wall, consisting of approved City trees and shrubs.
- *Impact after Mitigation 4c:* No impact would remain with the implementation of the proposed mitigations.

City Threshold 4d does not apply because the project would not be large or result in an exceeding monotonous visual environment.

City Threshold 4e does not apply because the project would not include a shoreline protection device.

Issue 5. Light and Glare (City Threshold 5a-5b)- would the project:

(a) Result in a moderate to large scale project with more than 50 percent of any single elevation of the exterior built with a light reflectivity greater than 30 percent, and the project is adjacent to a major public roadway or public area? The proposed project is considered to be a moderate scale structure that could increase the amount of light reflectivity in the area close to the 30% threshold. This would apply to the Road Capacity and Bicycle Safety alternatives only, because of the proposed retaining walls (in the bare concrete faced condition) and the larger overall extent of bright reflective concrete surfaces. However, this glare would not affect drivers or other road users that are the most sensitive to glare nor would it affect any nearby residential property, also considered to be sensitive glare receptors. The only user that would be affected by the glare from these retaining walls are current visitors to the parking lot at Horsepark. Therefore, this impact should only be considered a **low adverse** impact for these two alternatives. The other project alternatives would have **no impacts** for this issue.

(b) Will the project shed substantial light onto adjacent, light-sensitive property or land use, or would it emit a substantial amount of ambient light into the nighttime sky? Though the project would have automobiles that would contribute to the ambient light of the area and some of this light would spill over into adjacent properties, the proposed project would not differ much from the existing conditions, except that it would accommodate a higher level of vehicular flow. Sensitive receptors in the area would include wildlife in the river corridor, and equestrian uses at Horsepark. Neither of these receptors would be affected by the proposed project since they are tangential to the flow of traffic and the proposed project elements are likely to block vehicular lights more than the current condition. The proposed lighting sources along the roadways and bridges are limited to minimum light spacing standards of the City of San Diego and would concentrate lighting only at intersections. These lights would be low-pressure sodium that are planned to be placed in Mission Bell style fixtures. They would not result in a substantial light source since they would be consistent with City of San Diego "dark sky" guidelines to prevent night pollution. No impacts are expected from any of the project alternatives.

3.3.4.4 No Build Alternative

Under the No Build Alternative, the bridge would not be replaced and the road would not be elevated and widened. None of the visual impacts discussed in this section would occur.

3.3.5 Significance of Visual/Aesthetics Impacts under CEQA

3.3.5.1 CEQA Significance Thresholds

The analysis documented in this section reflects the visual quality thresholds for significance in the City of San Diego Significance Determination Thresholds (City of San Diego 2011). If a visual impact were determined to be Moderately adverse (M), Moderately High adverse (MH), or High adverse (H), it would be considered significant under CEQA. Impacts identified at M or MH generally would be mitigable to below of level of significance, but may not be, depending on specific circumstances. If an impact were identified as H, it definitely would not be mitigable to below a level of significance and would require selection of a different alternative to be avoided. Refer to Table 3.3-4 for a summary of impacts of the build alternatives.

3.3.5.2 Determination of Significance under CEQA

The conclusions of significance under CEQA for the alternatives analyzed are summarized in Table 3.3-5. For the issue of Aesthetics, all build alternatives would have significant and

mitigable aesthetic impacts from degradation of visual character due to loss of distinctive bridge railing, and from tree removal and vertical walls for certain alternatives. For the issue of Views, all build alternatives would have significant view impacts from blocking a view corridor and blocking a view of a public resource. The view blockage would be due to the fencing needed on the outside of the cantilever equestrian trail on the west side of the bridge. This impact is not mitigable to below a level of significance under CEQA. For the issues of Neighborhood Character and Development features, the Road Capacity and Bicycle Safety alternatives would have significant impacts due to the retaining walls that would exceed 6 feet in height. These impacts would be mitigable to below a level of significance. Light and glare impacts would not be significant for any of the build alternatives.

Impact	Threshold	Central	Road Capacity	Bicycle Safety	Western	Eastern	Round- about	Lower Elevation	No Build
Aesthetics	Degradation of visual character	SM	SM	SM	SM	SM	SM	SM	NS
Views	Blocking a view corridor or view of a public resource	SU	SU	SU	SU	SU	SU	SU	NS
Neighbor- hood Character	Bulk and height, stark contrast	NS	SM	SM	NS	NS	NS	NS	NS
Development Feature	Include walls above 6 feet	NS	SM	SM	NS	NS	NS	NS	NS
Light and Glare	Visible increase of 30% in reflectivity	NS	NS	NS	NS	NS	NS	NS	NS

 Table 3.3-5

 Summary of CEQA Significance for Visual/Aesthetics Impacts

NS = Not significant

SM = Significant and mitigable to below a level of significance

SU = Significant and unmitigable

3.3.6 Mitigation Measures

The following measures shall be implemented to minimize the above visual impacts of the build alternatives:

Vis-1 To mitigate impacts associated with Aesthetics issue 1a (change resulting from the removal of the vegetation that constitutes a visual resource), prior to bid opening/bid award, the Public Works Department shall submit a landscape plan to be verified as reviewed and approved by the LDR-Landscape and/or ADD Environmental designee prior to being incorporated into the plans and specifications. This study has assumed that a revegetation plan will be part of a formal mitigation measure related mostly to biological impacts and mitigations. To assure that Aesthetic issue 1a, Changes to the Quality of Current Scenic Resources, is addressed, the following requirements must be met: prior to bid opening/bid award, the Public Works Department shall submit a

landscape plan to be verified as reviewed and approved by the LDR-Landscape and/or ADD Environmental designee prior to being incorporated into the plans and specifications. This program would require the preparation of a revegetation plan prepared by a landscape architect. The revegetation plan for the river vegetation disturbed by construction shall be conducted as addressed in Section 3.12.5. Monitoring and maintenance would be required for a 5-year period to assure that the visual quality change has been fully mitigated, although the vegetation is expected to establish for visual purposes within 3 years, which is a standard protocol for establishment purposes of a restored area. This mitigation measure applies to all build alternatives.

- **Vis-2** To mitigate impacts associated with Aesthetics issue 1c(1) (change resulting from the change in the character of the bridge and the change in scale associated with the heightened nature of the bridge and its abutments), prior to bid opening/bid award, the Public Works Department and LDR-Landscape or ADD shall verify that the bridge railing system was designed to integrate the concrete barrier requirements of a K-rail with those commonly associated with a wood rail barrier. The barrier shall include a steel backed wood-appearing faced railing barrier. The railing shall have a dominant horizontal look and be painted white to match the existing rails. These treatments shall be extended down the roadway and substitute standard steel barriers with wood-appearing rail barriers. This mitigation measure applies to all build alternatives. An Optional Type ST-40 railing approved by Caltrans would be more consistent with the existing rural character and would allow for higher visibility through the railing, especially as seen from the roadway.
- To mitigate impacts associated with Aesthetics issue 1c(3) (change resulting from the Vis-3 removal of visual resources that make up the current visual character of an important public view, specifically the Polo Fields as seen from the existing and proposed bridge), prior to bid opening/bid award, the Public Works Department shall submit to LDR-Landscape and ADD for review and approval a landscape plan that has been incorporated into the plans and specifications. This program would require the preparation of a revegetation plan prepared by a landscape architect. As mitigation for the grove of trees removed at the southern end of the drainage ditch parallel to El Camino Real, in order to provide a visually comparable tree massing, the Eucalyptus tree grove (assumed to be 12 trees) and the Sycamore grove (assumed to be three trees) are proposed to be replaced at a 3:1 ratio (based on the mature size of the trees removed) utilizing varying container sizes up to 36-inch box trees for a total of 45 new trees. These trees are proposed to all be sycamore, even though many of the existing trees are eucalyptus. They shall be planted in a grove-like arrangement near the river, on each side of the bridge abutment, in a pattern that emulates a naturalized condition. In order to provide a visually comparable tree massing, the row of trees along the fence (assumed to be 30) are proposed to be replaced at a 3:1 ratio for a total of 90 new 24-inch box trees. These trees are proposed be planted as part of the parkway planter area (25-35 feet on center). The parkway trees to replace the row trees would be planted in a clustered, informal manner in accordance with City landscaping guidance. The fence itself is proposed to be reconstructed on each side of the new alignment. The entry gate into the Polo Fields is also proposed be replaced at the new entry to the Polo Fields. This mitigation measure applies to the Central Alignment, Eastern Alignment, Roundabout, and Lower Elevation alternatives.
- **Vis-4** To mitigate impacts associated with Aesthetics issue 1c(4), Neighborhood Character issue 3a, and Development Features issue 4c (impacts associated with large-scale walls associated with the Road Capacity and Bicycle Safety alternatives), prior to bid

opening/bid award, the Public Works Department shall submit to LDR-Environmental, LDR-Landscape, and ADD plans that incorporate the use of colored and textured concrete or alternating split face block with integral color for the retaining wall, depending on the material selected for the wall construction. In addition, prior to bid opening/bid award, the Public Works Department shall submit to LDR-Landscape and ADD a landscape plan prepared by a Landscape Architect that includes the use of vegetation placed in front of the wall, consisting of approved City trees and shrubs. This mitigation measure applies to the Road Capacity and Bicycle Safety alternatives only.

The above measures will be incorporated into the plans and specifications for the project during final design.

3.3.7 Significant and Unmitigable Impacts under CEQA

There are no measures to mitigate for Impact 2a(1), view corridor obstruction, and Impact 2b, blocking a view of a public resource, associated with the cantilever trail fencing. Although the final design of the bridge railing and fencing can reduce the impact, it would not reduce it to below a level of significance. A thin railing with fairly wide openings for the chain-link fencing along with a black vinyl covered galvanized steel fence would be superior to a standard chain link fence and would result in a reduction in the adversity of the impact, but it would not reduce the impact to less than significant. This impact would occur for all of the build alternatives. This impact would remain unmitigable under CEQA. Other impacts would be mitigated to below a level of significance under CEQA.

VISUAL CHARACTER UNITS

Photos 3-1 thru 3-6



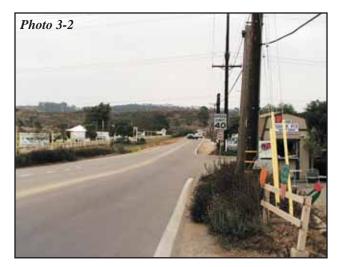
Aerial Oblique Project Overview



Character Unit 1 : Via de la Valle development



Character Unit 3 : Polo Fields



Character Unit A : El Camino Real roadway unit-project area



Character Unit 2 : Polo Fields, open unimproved parking lot



Character Unit 4 : San Dieguito River and streambanks

VISUAL CHARACTER UNITS Photos 3-7 thru 3-12



Character Unit 5 : Golf Course



Character Unit 7 : Agricultural fields



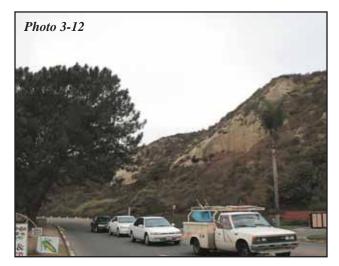
Character Unit 9 : Via de la Valle mixed commercial area



Character Unit 6 : Unimproved vacant parcels around intersection

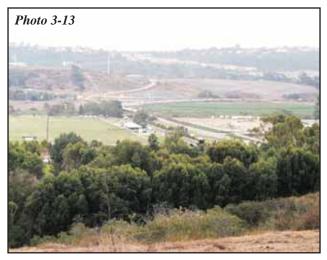


Character Unit 8 : Horse Park



Character Unit 10 : Via de la Valle open space hillsides

CANDIDATE KEY VIEWS Photos 3-13 thru 3-18



Candidate Key View 1 : View from Rancho Viejo Drive looking southwest



Candidate Key View 3 : View on El Camino Real looking south



Candidate Key View 5 : View from Polo Fields looking west-southwest



Candidate Key View 2 : View from Via del Canon looking south



Candidate Key View 4 : View from south of Polo Fields looking west



Candidate Key View 6 : View from Horse Park looking east-southeast

CANDIDATE KEY VIEWS

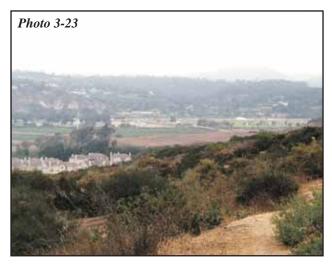
Photos 3-19 thru 3-24



Candidate Key View 7 : View from south of Horse Park looking east



Candidate Key View 9 : View from Old San Dieguito Road looking northwest



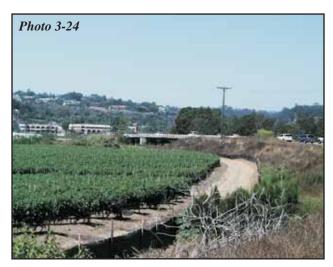
Candidate Key View 11 : View from High Bluff Drive looking northeast



Candidate Key View 8 : View from San Dieguito Road looking north on El Camino Real



Candidate Key View 10 : View from Old El Camino Road looking north



Candidate Key View 12 : View from agricultural fields southwest of project

CANDIDATE KEY VIEWS

Photos 3-25 thru 3-30



Candidate Key View 13 : View from golf course southeast of project



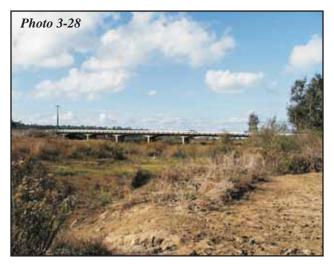
Candidate Key View 15 : View from bridge, west to San Dieguito River & Streambed



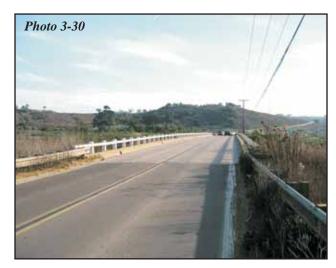
Candidate Key View 17 : View from Horse Park looking east



Candidate Key View 14 : View from private housing development northeast of project (Polo Point)



Candidate Key View 16 : View from access road terminus to the trail system (south of polo field)



Candidate Key View 18 : View on El Camino Real looking south towards existing bridge



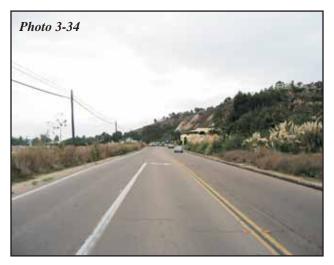
Candidate Key View 19 : View from El Camino Real bridge southwest toward JPA mitigation site



Candidate Key View 21 : View from north of Polo Fields looking west toward El Camino Real



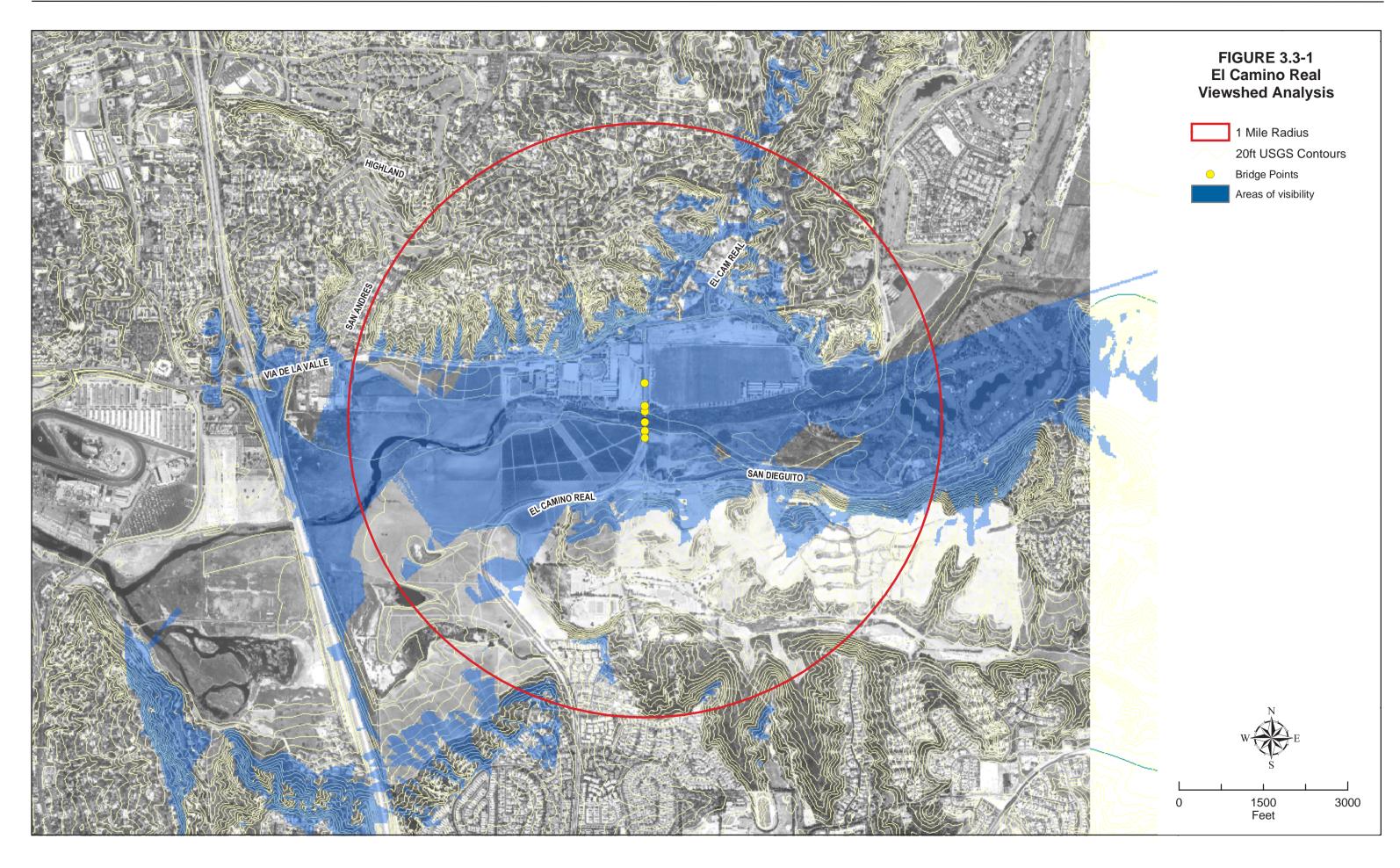
Candidate Key View 20 : View from El Camino Real and Via de la Valle looking east



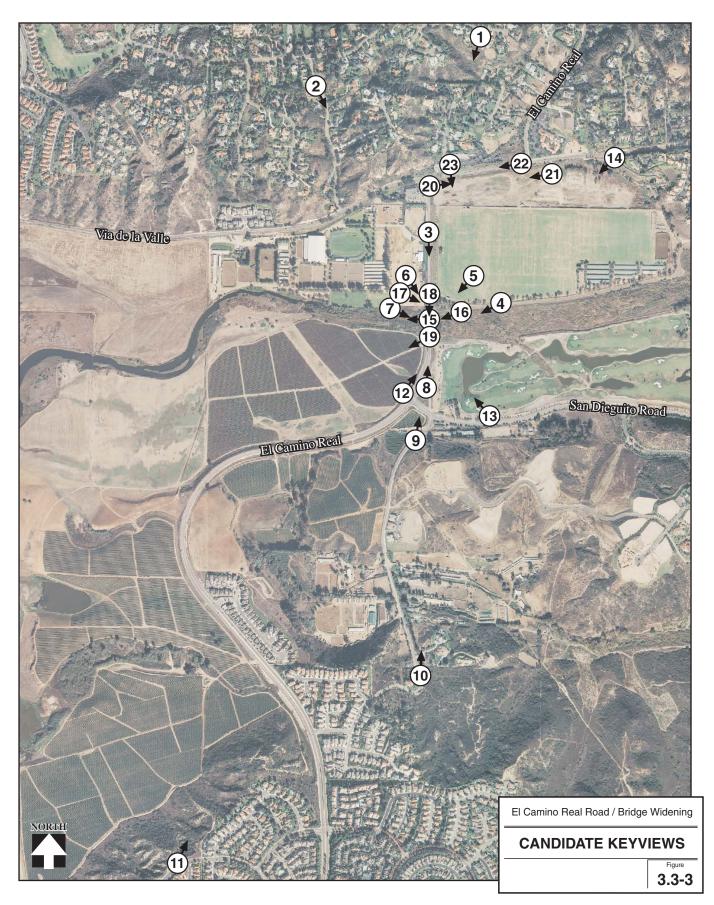
Candidate Key View 22 : View from Via de la Valle and El Camino Real North looking west



Candidate Key View 23 : View from De la Valle Place looking south







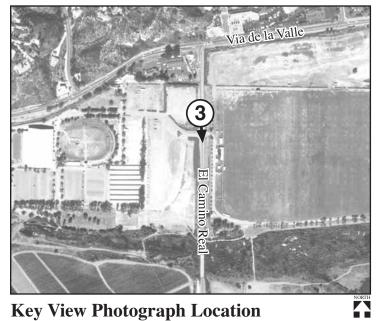
Recirculated Draft



Proposed Conditions*



Existing Conditions



Key View Photograph Location

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Central*, Western* Alignment, & Lower Elevation Alternative

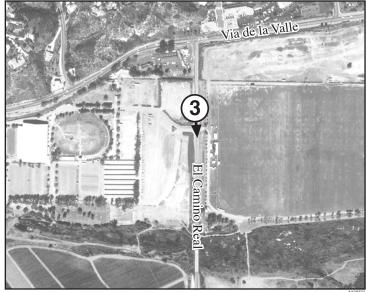


Proposed Conditions* with Mitigations



Existing Conditions

These simulations represent approximate renderings of project elements based on currently available information from engineering plans.



Key View Photograph Location

Land

 \mathbf{A}

Visual Set	tting Inform	nation
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Project Elements Seen	1,	2,4,	6	7
Primary Viewer Group	B,	C,D,	I,J	
Existing Key View Quality Assessmen		High	Moderate	Low
Visibility		Ex	istir	ng
Quantity of Viewers		\checkmark		
Viewer Sensitivity			1	
Visual Element Qua	alit	у		
			./	
Form			v	
Form Line			✓ ✓	
		✓	✓ ✓	
Line		✓	✓ ✓ ✓	
Line Color		✓	✓ ✓ ✓	
Line Color Texture		✓ ✓	✓ ✓ ✓	
Line Color Texture Perceptual Quality		✓ ✓	✓ ✓ ✓ ✓	

View on El Camino looking south

- **Project Elements**1 Cut / Fill Grading / Slopes
 2 Bridge Road, Median
- Bridge Road, Median
 Bridge Abutment & Pilings
 Retaining Walls / Guard Rails
- 5 Vegetation Removal
- 6 Ped. Walkway / Drainage Channel7 Wetland Mitigation Area

- Viewer Groups A Single-Family Residential B Agricultural Worker C Retail Worker

- D Retail Customers
- E Recreational Trail User*
- F Recreation Field User
- G Recreational Golfer
- H Cyclists & Pedestrians I Local Drivers
- J Arterial Drivers
- K Freeway Drivers
- (* This viewer group will increase in the future when the adjacent trail system is completed.)

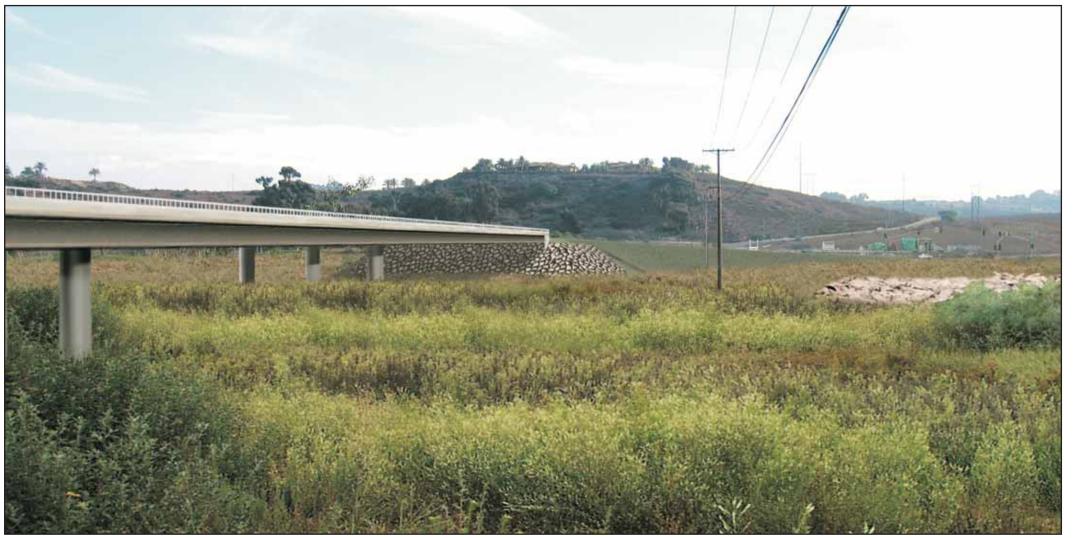
	Unn	nitiga	ated	М	itiga	ted	
Contrast Assessment of Project Elements	High Contrast	Moderate Contrast	Improves/Low Cont.	High Contrast	Moderate Contrast	Improves/Low Cont.	
Visual Quality							NA: Not Affected or Not Applicable
Vividness		\checkmark				\checkmark	
Intactness		\checkmark				\checkmark	
Unity			\checkmark			\checkmark	
Visual Organization			<			\checkmark	
View Quality							
Viewing Scene	NA						
Viewing Sites	NA						
Viewing Corridor	NA						
Community Character							
Design Character		\checkmark				\checkmark	
Landmark Features	NA						
Goals, Plans & Policies			\checkmark			\checkmark	

* Represents Bicycle Safety Alternative if one vehicle lane dropped, bike lane added & wider striped median added. Not likely to be implemented due to lack of federal funding.

El Camino Real Road / Bridge Widening

VISUAL SIMULATION #2

Road Capacity Alternative*

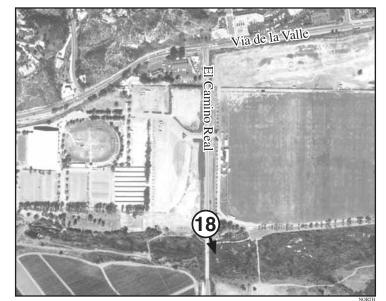


Proposed Conditions*



Existing Conditions

* Simulation Notes: These simulations represent approximate renderings of project elements based on currently available information from engineering plans.



Key View Photograph Location

Project Elements Seen	2,3,6,	8,9				1	ooking south	
rimary Viewer Group	H,I,J					1	Somi 5 South	
Existing Key View Quality Assessmen	nt		Low		1 Cu 2 Bu 3 Bu 4 Re 5 Ve	ut / Fi ridge l ridge z etainin egetati	lements Il Grading / Slopes Road, Median Abutment & Pilings ng Walls / Guard Rails ion Removal ulkway / Drainage Channel	
Visibility		xisti	ng				1 Mitigation Area	
Quantity of Viewers				-	View	ver G	roups Family Residential	
Viewer Sensitivity	- 124	\checkmark			B Ag	gricul	tural Worker	
Visual Element Qu	ality				D Re	etail C	Vorker Sustomers	
Form			_				ional Trail User* ion Field User	
Line			-	G Recreational Golfer H Cyclists & Pedestrians				
Color Texture		/	+	-	I Lo	ocal D	Drivers	
Perceptual Quality		√					Drivers y Drivers	
Vividness	√						wer group will increase in e when the adjacent trail	
Intactness	•	/	+	1			s completed.)	
Unity		V	+	+				
-	-							
Soutpost		nitiga			gate	•		
Assessment f Project	High Contrast	Moderate Contrast	Improves/Low Cont. pp	High Contrast	Moderate Contrast	Improves/Low Cont.		
Assessment f Project Clements						•	NA: Not Affected or Not Applicable	
Assessment f Project Clements /isual Quality						•		
Assessment f Project Clements Visual Quality Vividness		Moderate Contrast				•		
Assessment f Project Clements /isual Quality Vividness ntactness Jnity		Moderate Contrast				•		
Assessment f Project Clements /isual Quality /ividness ntactness Jnity Visual Organization		Moderate Contrast				•		
Assessment f Project Clements Visual Quality Vividness Intactness Unity Visual Organization View Quality	High Contrast	✓ Moderate Contrast				•		
Assessment f Project Clements Visual Quality Vividness Intactness Unity Visual Organization View Quality Viewing Scene		✓ Moderate Contrast	Improves/Low Cont.			•		
Assessment f Project Clements Visual Quality Vividness Intactness Unity Visual Organization View Quality Viewing Scene Viewing Sites	High Contrast	✓ Moderate Contrast				•		
Assessment f Project Clements /isual Quality /ividness intactness Jnity Visual Organization /iew Quality Viewing Scene Viewing Sites Viewing Corridor	High Contrast	✓ Moderate Contrast	Improves/Low Cont.			•		
Assessment f Project Clements Visual Quality Vividness Intactness Unity Visual Organization View Quality Viewing Scene Viewing Sites Viewing Corridor Community Charact	High Contrast	✓ Moderate Contrast	Improves/Low Cont.			•		
Assessment f Project Clements Visual Quality Vividness Intactness Unity Visual Organization View Quality Viewing Scene Viewing Sites Viewing Corridor Community Character	High Contrast	✓ Moderate Contrast	Improves/Low Cont.			•		
Assessment of Project Clements Visual Quality Vividness Intactness Unity Visual Organization View Quality Viewing Scene Viewing Sites Viewing Corridor Community Characte Design Character Landmark Features	High Contrast	✓ Moderate Contrast	Improves/Low Cont.			•		
Contrast Assessment of Project Elements Visual Quality Vividness Intactness Unity Visual Organization View Quality Viewing Scene Viewing Sites Viewing Sites Viewing Corridor Community Character Design Character Landmark Features Goals, Plans & Policies	High Contrast	✓ Moderate Contrast	Improves/Low Cont.			•		

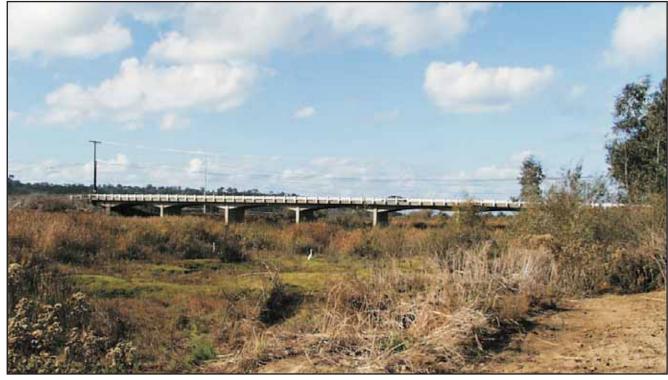
VISUAL SIMULATION #3

Eastern Alignment & **3.3-6**

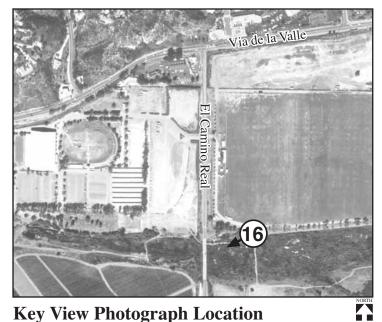
Figure



Proposed Conditions* with Mitigations (wood or wood replica railing)



Existing Conditions



Key View Photograph Location

View (Viewin Viewir

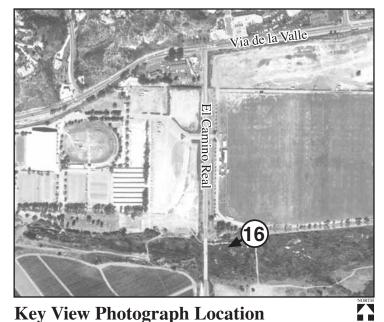
Visual Setting I	nfoi	ma	tion	l	7	/ie ⁻	w f	from Tr	ail End	
Project Elements Seen	3,		9			10	ook	ting sou	uthwest	
Primary Viewer Group	p B	, E, F,	G]				C		
Existing Key Vie Quality Assessm		High	Moderate	Low		1 Cu 2 Br 3 Br 4 Re 5 Ve	it / Fil idge I idge A tainin getati	lements Il Grading / Slo Road, Median Abutment & Pi ag Walls / Guar on Removal Ikway / Draina	lings d Rails	
Visibility		E	KISTII					l Mitigation Ar		
Quantity of Viewers	8							roups Family Residen	tial	
Viewer Sensitivity Visual Element C	hileu					B Ag	gricult	ural Worker /orker		
Form	cuam	- y	1			D Re	tail C	ustomers onal Trail Use	-*	
Line			· /			F Re	creati	on Field User		
Color		1	-		G Recreational Golfer H Cyclists & Pedestrians L Local Drivers					
Texture		-	1		I Local Drivers J Arterial Drivers					
Perceptual Quali	ty						5	Drivers		
Vividness			1		1	the	future	wer group will e when the adja		
Intactness		1			1	sys	tem is	s completed.)		
Unity			1		1					
					-		4 I	1		
		Unm	nitiga	· ·]	IVI	itiga	. :			
Contrast Assessment of Project Elements		High Contrast	Moderate Contrast	mproves/Low Cont	High Contrast	Moderate Contrast	Improves/Low Cont			
Visual Quality		H	2	Iı	Ξ	2	II	NA: Not At		
Visual Quanty			1					or Not App	licable	
Intactness			v ./			v ./				
Unity			• ./			• 				
Visual Organization			•	1		•	1			
View Quality										
Viewing Scene			\checkmark			\checkmark				
Viewing Sites		NA	-			-				
Viewing Corridor				1			1			
Community Chara	icter					·				
Design Character		✓				\checkmark				
Landmark Features			1				1			
Goals, Plans & Polici	es		\checkmark				1			
	E		amii	no I	Rea	al R	oac	l / Bridge	Widening	
	\	/15	SU	AL	. 9	SIN	1U	LATIO	N #4	
		(Cen	tra Alig				ern	Figure 3.3-7	



Proposed Conditions* with Mitigations (wood or wood replica railing)



Existing Conditions



Key View Photograph Location

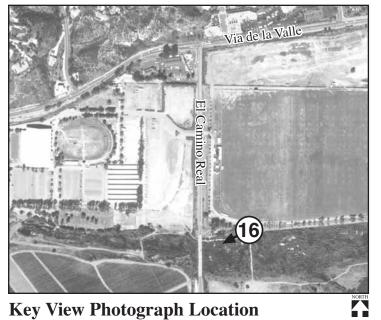
Visual Setting I	nfoi	ma	tion	l	١	/ie [*]	wſ	from Trail End		
Project Elements Seen		,4	9			10	ook	king southwest		
Primary Viewer Group	p B	, E, F,	G	J				C		
Existing Key Vie Quality Assessm		High	Moderate	Low		1 Cu 2 Br 3 Br 4 Re 5 Ve	it / Fil idge I idge / idge / etainir getati	Elements Il Grading / Slopes Road, Median Abutment & Pilings ng Walls / Guard Rails ion Removal ulkway / Drainage Channel		
Visibility		E>	kistii	ng		7 W	etland	1 Mitigation Area		
Quantity of Viewers	5							Foups Family Residential		
Viewer Sensitivity Visual Element C	Juali					B Ag	gricult	tural Worker Vorker		
Form	ruam	- y	1			D Re	tail C	Customers ional Trail User*		
Line			✓ ✓			F Re	creati	ion Field User		
Color		1	-		1	н Су	clists	ional Golfer & Pedestrians		
Texture			1		I Local Drivers J Arterial Drivers K Freeway Drivers					
Perceptual Quali	ty						-			
Vividness			\checkmark]	the	futur	wer group will increase in e when the adjacent trail		
Intactness		1				sys	tem 19	s completed.)		
Unity			1		J					
		Unm	nitiga	ted	М	itiga	ted			
Contrast Assessment of Project Elements		High Contrast	Moderate Contrast	Improves/Low Cont.	High Contrast	Moderate Contrast	Improves/Low Cont.			
Visual Quality								NA: Not Affected or Not Applicable		
Vividness			\checkmark			1				
Intactness			1			1				
Unity			1			1				
Visual Organization				 Image: A start of the start of			√			
View Quality			1							
Viewing Scene Viewing Sites		NA		_		 ✓ 				
Viewing Corridor		1121	1			1				
Community Chara	cter		-			-				
Design Character			\checkmark				\checkmark			
Landmark Features			1				1			
Goals, Plans & Polici	ies		\checkmark				\checkmark			
r										
	E		amii	no I	Rea	al R	oac	d / Bridge Widening		
		/15	SU	AL	. S	SIN	1U	LATION #5		
		E Roi	ast und	ern abo	Al out	ign Alt	me tern	ent & ^{Figure} natives 3.3-8		



Proposed Conditions*



Existing Conditions



Key View Photograph Location

Visua Vividn Intactn Unity Visual View Viewin

Visual Setting In	nfor	ma	tion	l	V	Viev	w f	from Tr	ail End
Project Elements Seen	2,3	3,4]		10	ook	ting sol	uthwest
Primary Viewer Group	B,1	E,F,	G					<u>8</u> 500	
Existing Key Vie Quality Assessme		High	Moderate	Low		1 Ču 2 Br 3 Br 4 Re 5 Ve	it / Fil idge I idge A idge A etainin getati	lements Il Grading / Slo Road, Median Abutment & Pi Ig Walls / Guar on Removal Ikway / Draina	lings rd Rails
Visibility		EX	cisti	ng				Mitigation A	
Quantity of Viewers		-						roups Family Residen	tial
Viewer Sensitivity Visual Element Qu	uality	✓				B Ag	gricult	ural Worker /orker	
Form	uanty	/	./		1	D Re	etail C	ustomers	.*
Line			✓ ✓		1 1	F Re	ecreati	onal Trail Use on Field User	[
Color		\	•	-	1	Н Су	clists	onal Golfer & Pedestrians	
Texture		•	1		I Local Drivers J Arterial Drivers K Freeway Drivers				
Perceptual Quality	V						2		
Vividness			1		1			wer group will e when the adj	
Intactness		1			1	sys	tem is	s completed.)	
Unity			1		1				
					_			1	
	L	Jnm	nitiga		IVI	itiga			
Contrast Assessment of Project Elements		High Contrast	Moderate Contrast	Improves/Low Cont	High Contrast	Moderate Contrast	Improves/Low Cont		
Visual Quality				Π	Η	4		NA: Not A	
Vividness			1			1		or Not App	licable
Intactness			· /			· /			
Unity			<i>\</i>			· /			
Visual Organization				<			1		
View Quality									
Viewing Scene			\checkmark			\checkmark			
Viewing Sites	1	NA							
Viewing Corridor				\checkmark			\checkmark		
Community Charac	cter								
Design Character		\			1				
Landmark Features			✓				✓		
Goals, Plans & Policie	s		\checkmark				\		
Г									
	El	Са	amii	no l	Rea	al R	oad	l / Bridge	Widening
		VI	sι	JA	L	SII	ML	JLATIO	DN #6
	F						& Bi ativ	cycle ves	Figure 3.3-9



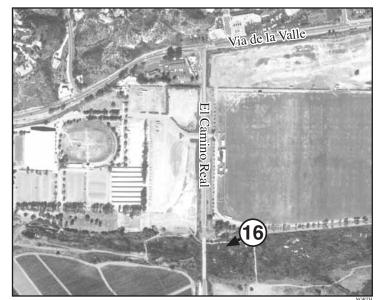
Proposed Conditions*



Existing Conditions

* Simulation Notes:

These simulations represent approximate renderings of project elements based on currently available information from engineering plans.



Key View Photograph Location

Visual Setting Information

visual Setting Inf	Or	ma	uon	
Project Elements Seen	3,	4,5		
Primary Viewer Group	В	, E, F,	G	
Existing Key View Quality Assessmen		High	Moderate	Low
Visibility		Ex	istir	ng
Quantity of Viewers				<
Viewer Sensitivity		1		
Visual Element Qua	alit	y		
Form			\checkmark	
Line			1	
Color		1		
Texture			1	
Perceptual Quality				
Vividness			\checkmark	
Intactness		\checkmark		
Unity			1	

View from Trail End looking southwest

- Project Elements 1 Cut / Fill Grading / Slopes 2 Bridge Road, Median 3 Bridge Abutment & Pilings 4 Retaining Walls / Guard Rails

- Vegetation Removal
 Ped. Walkway / Drainage Channel
 Wetland Mitigation Area

- Viewer Groups A Single-Family Residential B Agricultural Worker C Retail Worker

- D Retail Customers E Recreational Trail User*
- F Recreation Field User
- G Recreational Golfer
- H Cyclists & Pedestrians I Local Drivers J Arterial Drivers

- K Freeway Drivers
- (* This viewer group will increase in the future when the adjacent trail system is completed.)

	Unn	nitiga	ated	Μ	itiga	ted
Contrast Assessment of Project Elements	High Contrast	Moderate Contrast	Improves/Low Cont.	High Contrast	Moderate Contrast	Improves/Low Cont.
Visual Quality						
Vividness		\checkmark			\checkmark	
Intactness		1			1	
Unity		1			\checkmark	
Visual Organization			\checkmark			\checkmark
View Quality						
Viewing Scene		\checkmark			\checkmark	
Viewing Sites	NA					
Viewing Corridor			\checkmark			1
Community Characte	r _					
Design Character	1			1		
Landmark Features		1				\checkmark
Goals, Plans & Policies		1				1

NA: Not Affected or Not Applicable

El Camino Real Road / Bridge Widening

VISUAL SIMULATION #7

Lower Elevation Alternative



Proposed Conditions*



Existing Conditions

* Simulation Notes:

These simulations represent approximate renderings of project elements based on currently available information from engineering plans.



Key View Photograph Location

Visual Setting Information

Project Elements Seen Primary Viewer Group		4, 5, F,G,	9 H,I,J	-
Existing Key View Quality Assessmen		High	Moderate	Low
Visibility		Ex	istir	ng
Quantity of Viewers		✓		
Viewer Sensitivity			1	
Visual Element Qua	ality	у		
Form		✓		
Line			\checkmark	
Color		1		
Texture			\checkmark	
Perceptual Quality				
Vividness			\checkmark	
Intactness		✓		
Unity		1		

View from Bridge looking west

- Project Elements
 1 Cut / Fill Grading / Slopes
 2 Bridge Road, Median
 3 Bridge Abutment & Pilings
 4 Pilings Abutment & Pilings
- Retaining Walls / Guard Rails
- Vegetation RemovalPed. Walkway / Drainage Channel
- 7 Wetland Mitigation Area

- Viewer Groups A Single-Family Residential B Agricultural Worker
- C Retail Worker
- D Retail Customers E Recreational Trail User*
- F Recreation Field User
- G Recreational Golfer
- H Cyclists & Pedestrians
- Local Drivers
- Arterial Drivers
- K Freeway Drivers
- (* This viewer group will increase in the future when the adjacent trail system is completed.)

	Unn	nitiga	ated	М	itiga	ted	
Contrast Assessment of Project Elements	High Contrast	Moderate Contrast	Improves/Low Cont.	High Contrast	Moderate Contrast	Improves/Low Cont.	
Visual Quality							NA: Not Affected or Not Applicable
Vividness		\checkmark			\checkmark		
Intactness		1			\checkmark		
Unity		1			\checkmark		
Visual Organization		\checkmark			\checkmark		
View Quality							
Viewing Scene	\checkmark				\checkmark		
Viewing Sites	NA						
Viewing Corridor	\checkmark			\checkmark			
Community Character							
Design Character		1			\checkmark		
Landmark Features		1			1		
Goals, Plans & Policies		1			1		

* Metal Railing and sidewalk (behind concrete barrier) do not occur for **Road** Capacity & Bicycle Safety Alternatives.

El Camino Real Road / Bridge Widening

VISUAL SIMULATION #8

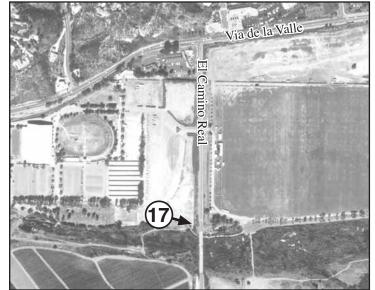
All Alternatives*



Proposed Conditions*



Existing Conditions



Key View Photograph Location

Project Primary

 \mathbf{A}

Visual Setting Information

Primary Viewer Group	1, 3, 4 B, E, H	[_		Pa	rk	looking east
Existing Key View	D,E,H						-
Quality Assessment Visibility		Moderate	Low		1 Cu 2 Br 3 Br 4 Re 5 Ve 6 Pe	it / Fi idge l idge / tainir getati d. Wa	lements II Grading / Slopes Road, Median Abutmen ng Walls / Guard Rails ion Removal Ilkway / Drainage Channel
Quantity of Viewers			1				d Mitigation Area
Viewer Sensitivity	1				A Si	ngle-F	roups Family Residential
Visual Element Qual	ity				C Re	tail W	tural Worker Vorker
Form		\checkmark					ustomers ional Trail User*
Line		1		1 1	F Re	creati	ion Field User ional Golfer
Color	1				н Су	clists	& Pedestrians
Texture	1				J Ar	terial	rivers Drivers
Perceptual Quality			l			•	y Drivers
Vividness	1			ר ו	the	futur	wer group will increase in e when the adjacent trail
Intactness		1			sys	tem is	s completed.)
Unity		1		1			
			ha al			-1	
	Unm	iitiga		IVIITI	gate	•	
Contrast Assessment of Project Elements	High Contrast	Moderate Contrast	Improves/Low Cont	High Contrast	Moderate Contrast	Improves/Low Cont	
Visual Quality							NA: Not Affected or Not Applicable
Vividness		\checkmark			1		of Not Applicable
Intactness	1			1			
Unity		~			1		
Visual Organization		\checkmark			1		
View Quality							
Viewing Scene	NA						
Viewing Sites	NA						
Viewing Corridor	NA						
Community Character	r						
Design Character		\checkmark				\checkmark	
Landmark Features		\checkmark			\checkmark		
Goals, Plans & Policies		\checkmark			√		

View from Horse

El Camino Real Road / Bridge Widening

VISUAL SIMULATION #9

Central & Western Alignment, Lower Elevation Alternative 3.3-12

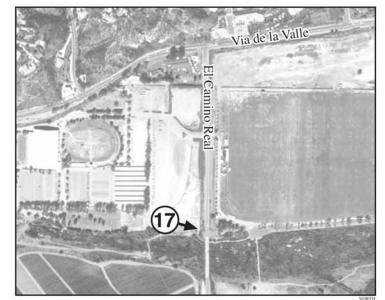
Figure



Proposed Conditions*



Existing Conditions



Key View Photograph Location

Visua Project Primary

Existi Quali

Visib Quant Viewe Visua

Contr Assess of Pro Eleme

Visua Vividn Intactn Unity Visual View

Viewin Viewin

al	Setting	Information
----	---------	-------------

Visual Setting Inf	ntion	View from Horse						
Project Elements Seen	1,3,4	3					looking east	
Primary Viewer Group	B,E,H	l			I d	11	looking east	
Existing Key View Quality Assessmen Visibility	t	isti Moderate	ng		1 Cu 2 Br 3 Br 4 Re 5 Ve 6 Pe	ut / Fil idge I idge / etainin egetati ed. Wa	lements Il Grading / Slopes Road, Median Abutment & Pilings ng Walls / Guard Rails ion Removal Ikway / Drainage Channel I Mitigation Area	
Quantity of Viewers			1				roups	
Viewer Sensitivity	1				A Si	ngle-F	Family Residential	
Visual Element Qua	lity				C Re	tail W	ural Worker /orker	
Form		1					ustomers onal Trail User*	
Line		1			F Re	creati	on Field User onal Golfer	
Color	1				н Су	clists	& Pedestrians	
Texture	1				J Ar		Drivers	
Perceptual Quality						ਲ ਕਈ	Drivers	
Vividness	1				the	future	wer group will increase in e when the adjacent trail	
Intactness		1			sys	tem is	s completed.)	
Unity		1	1					
Contrast Assessment of Project Elements	High Contrast	Moderate Contrast	Improves/Low Cont	High Contrast	Moderate Contrast	Improves/Low Cont		
Visual Quality							NA: Not Affected or Not Applicable	
Vividness		1		-	1		or Not Applicable	
Intactness	1			1				
Unity		1			1			
Visual Organization		1			1			
View Quality								
Viewing Scene	NA							
Viewing Sites	NA							
Viewing Corridor	NA							
Community Characte	ər							
Design Character		1				1		
Landmark Features		1			1			
					1			

El Camino Real Road / Bridge Widening

VISUAL SIMULATION #10

Road Capacity & Bicycle Safety Alternatives

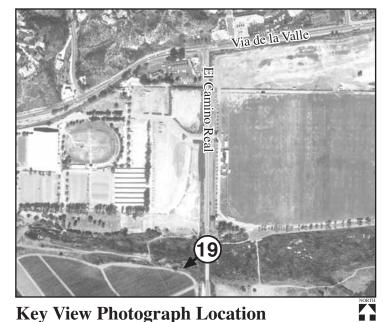


Proposed Conditions*



Existing Conditions

These simulations represent approximate renderings of project elements based on currently available information from engineering plans.



Key View Photograph Location

Visual Setting Information

Project Elements Seen	1, 2, 4,		loo	
Primary Viewer Group	E,H,I,.	J		
Existing Key View Quality Assessmen		Moderate	Low	Proje 1 Cu 2 Br 3 Br 4 Re 5 Ve
Visibility	E	kistir	ng	6 Pe 7 W
Quantity of Viewers		1		View
Viewer Sensitivity		1		A Sin B Ag
Visual Element Qua	lity			C Re
Form		\checkmark		E Re
Line		1		F Re G Re
Color	1			H Cy I Lo
Texture		1		J Ar
Perceptual Quality				K Fre
Vividness		\checkmark		the
Intactness		\checkmark		sys
Unity	1			

View from bridge oking southwest

- ject Elements Cut / Fill Grading / Slopes Bridge Road, Median Bridge Abutment & Pilings Betaining Walls / Guard Rails

- egetation Removal ed. Walkway / Drainage Channel Vetland Mitigation Area

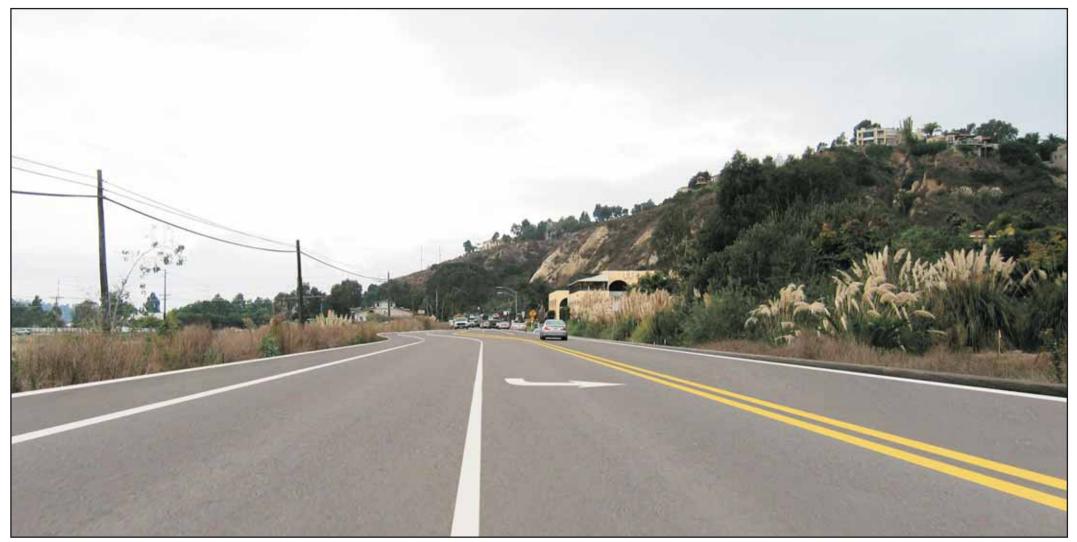
- ver Groups ngle-Family Residential
- ricultural Worker
- etail Worker
- etail Customers
- creational Trail User*
- creation Field User
- creational Golfer
- clists & Pedestrians
- cal Drivers
- rterial Drivers reeway Drivers
- nis viewer group will increase in e future when the adjacent trail stem is completed.)

	Unn	nitiga	ted	Miti	gate	d	
Contrast Assessment of Project Elements	High Contrast	Moderate Contrast	Improves/Low Cont.	High Contrast	Moderate Contrast	Improves/Low Cont.	
Visual Quality			÷	-			NA: Not Affected or Not Applicable
Vividness		1			1		or recurppineuoio
Intactness		1			1		
Unity		1			1		
Visual Organization		\checkmark			\checkmark		
View Quality							
Viewing Scene		\checkmark			\checkmark		
Viewing Sites		1			1		
Viewing Corridor		\checkmark			\checkmark		
Community Characte	r						
Design Character		\checkmark			1		
Landmark Features		1			1		
Goals, Plans & Policies	1			1			

El Camino Real Road / Bridge Widening

VISUAL SIMULATION #11

Wetlands Mitigation Concept

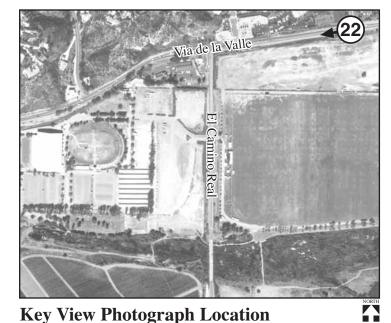


Proposed Conditions*



Existing Conditions

These simulations represent approximate renderings of project elements based on currently available information from engineering plans.



Key View Photograph Location

Project Primar

Exist Qual

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View on Via de la alle looking west

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- Retail Worker Retail Customers Recreational Trail User*
- Recreation Field User
- Recreational Golfer
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El Camino Real Road / Bridge Widening

VISUAL SIMULATION #12

Via de la Valle Widening & El Camino Real North



Proposed Conditions*



Existing Conditions

These simulations represent approximate renderings of project elements based on currently available information from engineering plans.



Key View Photograph Location

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View on De la Valle ce looking south

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El Camino Real Road / Bridge Widening

VISUAL SIMULATION #13

Eastern Alignment Alt. & De la Valle Place



Proposed Conditions*



Existing Conditions

These simulations represent approximate renderings of project elements based on currently available information from engineering plans.



Key View Photograph Location

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View on De la Valle ce looking south

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- Vegetation Removal Ped. Walkway / Drainage Channel Wetland Mitigation Area

- wer Groups Single-Family Residential
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- Retail Worker
- Retail Customers
- Recreational Trail User*
- Recreation Field User
- Recreational Golfer
- Cyclists & Pedestrians
- Local Drivers
- Arterial Drivers Freeway Drivers
- This viewer group will increase in the future when the adjacent trail stem is completed.)

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El Camino Real Road / Bridge Widening

VISUAL SIMULATION #14

Roundabout Alternative & De la Valle Place

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3.4 HISTORICAL RESOURCES

This section evaluates the impacts of the proposed project on cultural resources in the Area of Potential Effect (APE), shown in Figure 3.4-1, which is the outside boundary of all of the alternatives, and so is larger than any individual alternative would be. The APE includes the JPA Mitigation Site. This section is based on the Cultural Resource Inventory for El Camino Real Road/Bridge Widening Project (Tierra Environmental Services [Tierra] 2005), and the Historical and Architectural Assessment of the El Camino Real Bridge (Local Agency Bridge No. 57C0042, City of San Diego (Jordan 2006). A letter report to update the Cultural Resources Inventory was prepared for this recirculated EIR (Tierra 2012). These separate technical reports are incorporated into this EIR by reference, and are available for inspection at the City of San Diego.

3.4.1 Regulatory Setting

Cultural resource studies were conducted in accordance with Section 106 of the National Historic Preservation Act (NHPA), CEQA, and the City LDC, and their respective implementing guidelines and regulations. The FHWA is the lead federal agency as a result of project funding. Caltrans serves as their agent, provides technical oversight, and processed the Section 106 documentation through FHWA and the California State Historic Preservation Office (SHPO). The City is the lead agency for CEQA compliance and compliance with City guidelines and regulations. The USACE is a reviewing agency due to federal permitting requirements.

3.4.2 Affected Environment

For the 2006 Draft EIR, archaeological site and literature reviews were conducted at the South Coastal Information Center (SCIC) and the San Diego Museum of Man for the project APE and a 1-mile radius in 1998 and 2003. Four surveys were conducted in association with the proposed project. The first was conducted in June 1998; the second in May 2003; the third in March 2004; and the fourth in December 2005. The record searches revealed that one previously recorded site (CA-SDI-686 Locus C) was located within the APE. The site was previously determined by the City not to be significant and was not relocated during the surveys conducted in 1998 and 2003. Three sites (CA-SDI-14,969, CA-SDI-8,225/H and CA-SDI-10,117) are recorded as located adjacent to the APE. The ground surface was carefully examined to determine whether or not these sites extended into the APE. All three of these sites were relocated and found to be outside the APE. Overall, 33 previous studies have been conducted and 55 previously recorded cultural resources have been located within a 1-mile radius of the project area. Most of these sites are prehistoric temporary camps and include lithic and shell scatters.

For this recirculated EIR, Tierra conducted a records and literature search for the APE at the SCIC on April 18, 2012. The study area encompassed the project footprint plus a one-mile search radius. The records search indicated that within the one mile buffer, 110 cultural resources investigations are on file at the SCIC (Table 1 in the 2012 letter report). Furthermore, the proposed project area has been either partially or completely surveyed between 1929 and 2010. The records search also identified a total of 54 resources within the one-mile search area, which included six resources crossing into the proposed project footprint.

Forty-eight of the 54 resources documented were prehistoric, with four historic and two sites with a combined prehistoric and historic assemblage. The prehistoric resources included 27 temporary camps, eight shell midden or shell scatters, six lithic and shell scatters, five lithic scatters, and two hearth feature sites. The four historic resources included three sites with foundations and associated refuse and one isolated refuse deposit. Both of the combined prehistoric and historic

assemblage sites consisted of a prehistoric temporary camp with historic refuse. Of the six sites identified within the project footprint, three were identified on the south side of the San Dieguito River and three on the north.

In addition, should the Roundabout Alternative be selected the area proposed for additional mitigation was also reviewed based on the results of the Cultural Resources Inventory and a record search completed by RECON Environmental, Inc. (RECON) in 2012. There are no previously recorded historical resources within the area proposed for additional mitigation.

3.4.2.1 Prehistoric Resources

The first cultural resource survey for the project was conducted on June 12, 1998. No new sites were located during that survey. Two previously recorded sites were relocated in the area west of El Camino Real on Via de la Valle in an area that is no longer part of the APE. CA-SDI-686 Locus C appeared to have been heavily impacted by the previous realignment of El Camino Real and was not relocated within the APE. Only a small amount of shell was identified in the proposed wetlands mitigation site in the area of tomato fields.

The APE was surveyed again on May 21 and 22, 2003 to determine if any previously recorded sites or unrecorded cultural resources are located within the APE. No new sites were located during the survey. An examination of the area that previously contained CA-SDI-686 Locus C, again found no resources located within or adjacent to the APE. This portion of site CA-SDI-686 Locus C has been destroyed by grading and road construction. As part of a cultural resource study conducted for the realignment of El Camino Real in 1986, Cárdenas and Robbins-Wade determined that due to the heavily disturbed nature of the area, this portion of the locus was not significant (1986). The subsequent realignment of El Camino Real in the vicinity of San Dieguito Road has only further obliterated the portion of the site within the current APE, and no further work at CA-SDI-686 Locus C is necessary.

The 2012 letter report (Tierra 2012) describes six sites, including CA-SDI-686. This discussion is summarized below.

CA-SDI-686. This resource was originally recorded in 1960 south of the modern day intersection of El Camino Real and San Dieguito Road. In 1984, the site was revisited and the record updated to describe a surface scatter with four discreet loci exhibiting debitage, lithic tools, a mano, and marine shell. The loci were further characterized as representing a series of temporary camps with some midden soil visible. Archaeological testing conducted two years later within the proposed grading footprint for the realignment of El Camino Real yielded artifacts in subsurface deposit that included debitage, a bifacial tool fragment, utilized scrapers, a bone artifact, and historic artifacts. Prehistoric ecofacts also included shell, bone, and charcoal. In recent years the site was revisited during an SDG&E maintenance project, wherein the archaeological monitor identified scattered marine shell within the SDG&E right of way. In 2010, two mano fragments and a hammerstone were identified during a survey for a proposed utility line project across the site.

During the recording and subsequent testing of the resource in the mid-1980s, the site boundary was defined as extending to the adjacent modern roadbeds. However, it is possible that the additional artifacts may be identified on the northwestern side of El Camino Real during any ground disturbing activities.

CA-SDI-8225/H. This site was originally recorded in 1980 east of the of the modern day intersection of El Camino Real and San Dieguito Road, with more than 10 manos and mano fragments, 2 metate fragments, and a sparse assemblage of lithic material noted at the site adjacent to the wooden corrals comprising a horse ranch. Testing in 1983 identified a diverse historic and prehistoric site assemblage including hearth features and an unsubstantiated claim of potential cremated human remains. The broad assortment of artifactual material included pottery, groundstone, scrapers, hammerstones, and a projectile point fragment. Ecofacts documented at the site included marine shell and bone fragments.

During the recording and subsequent testing of the resource in the early 1980s, the site boundary was defined as extending north of the current San Dieguito Roadbed just within the boundary of the current project footprint.

CA-SDI-10117. This site was originally recorded and tested in 1984. The site was identified as a temporary camp with a moderate density of marine shell, artifacts, and midden soils. The testing yielded artifacts that included fire-affected rock, a core, debitage, and pottery. The site record also indicated a disturbed shell scatter existed north of the site on the opposite side of San Dieguito Road. In 1993, the site was concluded to have been destroyed by residential and urban development of the area.

During the initial recording and testing of the resource in the mid-1980s, a notably disturbed area with marine shell was identified to the north of the established boundary for CA-SDI-10117. Furthermore, site CA-SDI-8225/H is less than 100 meters to the northeast and may have contributed to a much larger site that was subsequently bisected by roads and area development. Therefore, it is possible that any work performed in the vicinity of San Dieguito Road could turn up portions of one or both of these two sites.

CA-SDI-16695. This site was originally recorded in 1929 based on information received from a road crew conducting work in 1917. The crew reported several cinerary urns or ollas containing calcined bone and beads. The 1929 report noted that the site was disturbed by roads, cultivation, and construction. Subsequent revisits over the years have resulted in conclusions that the site was extremely disturbed. Based on the repeated descriptions of disturbances between 1929 and 2006, it would appear to be highly unlikely that such a deposit would still be present today. However, this site is not within the project footprint of the build alternatives.

CA-SDI-16696. This site is located immediately east of CA-SDI-16695 and is likely just an extension of that site. In 1998, a survey crew identified this portion of the site describing a light scatter of marine shell in a disturbed context. Based on the repeated descriptions of disturbances between 1929 and 1989, it would appear to be highly unlikely that such a deposit would still be present today. Based on test excavations completed in 2012 by RECON, there are portions that contain intact deposits including a cremation and associated artifacts (Price 2013). This site is not located within the project footprint; however, it is possible that any work performed in the intersection of Via de la Valle and El Camino Real could turn up portions of this site.

CA-SDI-18608. The site was originally recorded in 1975. The feature was noted as consisting of an oval-shaped hearth feature with no additional associated artifacts or features. According to the site record, the feature was likely disturbed by a residential development project. To date, the feature has not been relocated according to the information on file at SCIC. However, since the site was only observed to be a surface deposit, and given the extensive disturbance in this vicinity, it remains unlikely the resource exists at present.

3.4.2.2 Historical Resources

The project APE includes a portion of the historic path of El Camino Real traversed by Spanish explorer Gaspar de Portola's 1769 expedition. El Camino Real has been designated California Registered Historical Landmark No. 784. The section of El Camino Real within the APE retains its integrity of location, but no longer retains integrity of setting as the valley has become increasingly developed. El Camino Real in this region has also lost integrity of feeling, association, design, materials, and workmanship.

The bridge crossing the San Dieguito River within the project APE is known as the El Camino Real Bridge (57C0042). The bridge is a seven-span reinforced concrete arched deck girder structure built in 1940 and is of historic age. The bridge was evaluated for significance in 1986 by Caltrans and determined not to be eligible for nomination to the National Register of Historic Places (National Register). This evaluation was based on age and architectural and engineering significance. Because this evaluation was more than 10 years old at the time of preparation of the 2006 Draft EIR, the bridge was reevaluated by Caltrans for significance in September 1998, and was again determined not to be eligible for nomination to the National Register or the California Register of Historical Places (California Register). The bridge was evaluated for CEQA and City of San Diego significance as part of the 2006 Draft EIR and was found not to be a significant resource (Jordan 2006).

Consultation with Caltrans for the 2006 Draft EIR resulted in the identification of three parcels (APN-302-21-051, APN-302-21-052, and APN-302-26-103) and a section of El Camino Real that required historic resource evaluation due to their proximity to the APE. Parcels 302-21-051 and 302-21-052 are located south of Via de la Valle and west of El Camino Real. Parcel 302-26-103 is located southeast of the intersection of San Dieguito Road and El Camino Real. These parcels were evaluated for their potential significance and listing on the National Register and the California Register.

The northern portion of the project area along Via de la Valle was undeveloped as of 1872, although the La Jolla Quad of 1903 indicates a structure west of El Camino Real on the south side of Via de la Valle. Previous research reported that, in 1919, a dairy was established on 20 acres at the intersection of El Camino Real and Via de la Valle (Bronson 1968:54). The 1928 San Diego County aerial photographs show a cluster of buildings at this intersection west of El Camino Real and south of Via de la Valle. In addition, a bridge over the San Dieguito River is visible along El Camino Real. The buildings and bridge are also apparent in 1945 US Navy and 1953 AXN aerial photographs of the project area. These buildings were subsequently removed and the two current structures, All Creatures Veterinary (APN-302-21-051) and Mary's Tack and Feed (APN-302-21-052), were constructed in about1982 and 1984, respectively (Mosley 2003).

Parcel 302-26-103 is occupied by multiple structures including a Craftsman period farmhouse and outbuilding, and a later residence and associated buildings which make up Rancho Del Mar, a horse farm. Buildings located on the parcel include a 1950s/1960s era ranch style home and garage, a stable, covered open air stalls, two riding rings, a barn, the large two-story Craftsman-period residence (built about 1915 according to the current owner) and a small single story residence and carriage house dating to the turn of the century. The Craftsman farmhouse is the only structure determined to be potentially eligible for potential listing on the California Register, but is located nearly 900 feet outside the project area for most of the alternatives, and more than 500 feet from the edge of the Roundabout Alternative project footprint. Per the Historic Resources Evaluation Report (HRER), the other structures were not evaluated due to not being 50 years or older (Jordan 2006).

3.4.2.3 Traditional Cultural Resources

No Traditional Cultural Properties were identified within the APE through records searches or the Native American contact program. Other potential traditional cultural resources within the region will not be affected by the project.

3.4.3 Impacts

Issue 1: *How would the proposed project affect historic and prehistoric resources in the APE*?

Issue 2: How would the proposed project affect resources with Native American values?

3.4.3.1 Issue 1a: Impacts to Prehistoric Sites

No significant archaeological resources are known to be located within the project APE. A portion of site CA-SDI-686 Locus C was identified by the record search for the 2006 Draft EIR as within the cultural resources study area but the locus has been destroyed and was not relocated within the project APE.

The 2012 letter report (Tierra 2012) notes that according to the information obtained from the SCIC, the entire project area has been subjected to various forms of archaeological survey between 1929 to the present day. Furthermore, these surveys have provided a significant quantity of archaeological site data associated with both historic and prehistoric utilization of the San Dieguito River channel for an extended amount of time. Also, given the inherent depositional nature of the environment and the documented testing within the project footprint identifying deposit in excess of 50 centimeters, ground-disturbing activities may identify additional site features and deposits not previously recorded. Furthermore, with the possibility of cremated remains existing on both sides of the riverbed, the potential sensitivity for encountering human remains is regarded as moderately high diminished only by the extensive disturbance in the area.

The potential for buried and undiscovered archaeological resources does exist within the APE, which is essentially made up of Holocene alluvium. Archaeological and Native American monitoring is recommended during earth moving activities associated with the project in order to identify buried cultural resources that may be uncovered during construction.

3.4.3.2 Issue 1b: Impacts to Historic Sites

A portion of one property, located near the intersection of Via de la Valle and El Camino Real, Mary's Tack and Feed, is less than 30 years old and therefore does not meet the designation criteria for historical resources. The property located at El Camino Real and San Dieguito Road contains three buildings older than 50 years and later buildings that were moved on the property, in addition to buildings of a recent date that were constructed on site. An early 1910s Craftsman farmhouse meets the criteria for significance under CEQA. However, the road-widening project would not affect this historic resource. Project impacts would be more than 900 feet away from this building for most alternatives and 500 feet away for the Roundabout Alternative and would not affect the qualities of this structure or integrity of setting that makes it a significant historical resource under CEQA.

In general, the other two buildings over 50 years old have been so altered over the years as to have lost integrity, and none are associated with important persons or events, as identified in the historic context, nor are they architecturally significant under CEQA and NEPA or likely to yield information important in history. None have the potential to be elements of a historic district. There are no resources associated with the Mexican rancho period, nor with 19th century settlement or agriculture. Loss of farm groves and land to post World War II and recent development precludes any continued association with that theme, and there are no remaining structures associated with early railroad development.

The El Camino Real Bridge crossing San Dieguito River in the APE was classified as Category 5 in the Caltrans Historic Bridge Inventory. The structure was reevaluated for significance for the 2006 Draft EIR and found not to be significant.

The project APE includes a portion of the historic path of El Camino Real traversed by Portola's 1769 expedition. El Camino Real has been designated California Registered Historical Landmark No. 784. This section of El Camino Real retains its integrity of location, but no longer retains integrity of setting as the valley has become increasingly developed. In addition, the roadway has been raised above the original historic trail and is currently paved, lacking integrity of materials, workmanship, design, feeling and association.

3.4.3.3 Issue 2: Impacts to Resources with Native American Values

A Native American contact program was conducted for the 2006 Draft EIR to identify Traditional Cultural properties and concerns in the project area. No Traditional Cultural Resources have been identified within the vicinity of the project, and therefore no impacts are expected to occur. However, Mr. Clarence Brown Sr. (now deceased) of the Viejas Band of Mission Indians expressed concerns related to potential for human remains in the area and wanted the Tribe to be involved in any testing or construction monitoring. To address this concern, Native American monitoring has been recommended as part of the Mitigation Monitoring and Reporting Program (MMRP).

3.4.3.4 No Build Alternative

Under the No Build Alternative, none of the project components that could disturb historical resources would be constructed. None of the potential impacts to historical resources discussed in this section would occur.

3.4.4 Significance of Historical Resource Impacts under CEQA

Under CEQA, cultural resources that may be impacted must be evaluated for significance. The evaluation requires comparing the resource(s) with criteria outlined in the California Register. The California Register is similar to and includes all listings under federal law, which established the National Register. To identify important resource qualities such as age, association, and integrity, the evaluation process typically requires some form of research. This research can include historic research, archaeological excavation, and/or Native American consultation depending on the type and nature of the resource.

Significance of archaeological resources is most frequently based on their potential to yield important information but other significant associations can be present. Archaeological information is often more scientific in nature and is often based on regionally significant research questions. Because most of the important aspects of these resources lie beneath the ground, the

resources are often fragile and liable to looting, and their importance is based on scientific research, public interpretation is often more difficult and interest is limited by lack of knowledge and visibility.

The importance of historic architectural resources is most often related to association with particular persons or events important in history. This can range from famous owners or architects to association with important events or periods in history such as the mission era or other themes important in California history. Architectural resources can also be important for their particular design, engineering or style.

The importance of traditional cultural resources lies in their roles within living communities. These resources can be very significant in the eyes of communities such as Native American and other ethnic groups. Resources such as Tecate Peak in the County and Chicano Park in the City of San Diego have mobilized various constituencies toward their preservation. The significance of these resources is based on their reminder of traditions and communication of culture.

3.4.4.1 CEQA Significance Thresholds

The City's Significance Determination Thresholds (2011) note that for the purposes of CEQA, a significant historic resource is one which qualifies for the California Register of Historical Resources or is listed in a local historic register or deemed significant in a historical resource survey, as provided under Section 5024.1(g) of the Public Resources Code. A resource that is not listed in, or determined to be eligible for listing in, the California Register of Historical Resources, not included in a local register of historic resources, or not deemed significant in a historical resource survey may nonetheless be historically significant for purposes of CEQA.

A resource may be listed in the California Register if it is significant at the local, state, or national level, under one or more of the following four criteria.

- a. It is associated with events or patterns of events that have made a significant contribution to the broad patterns of local or regional history and cultural heritage of California or the United States.
- b. It is associated with the lives of persons important to the nation or California's past.
- c. It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master, or possesses high artistic value.
- d. It has yielded, or has the potential to yield, information important to the prehistory or history of the state or nation.

Criteria for eligibility to the City's Historical Resources Register follows similar criteria as the California Register, but is based on a local perspective rather than state or national significance but includes any properties listed on the California or National registers. The significance of a historical resource is based on the potential for the resource to address important research questions and is related to a number of factors specific to a particular site including site size, type and integrity; presence or absence of a subsurface deposit, soil stratigraphy, features, diagnostics, and datable material; artifact and ecofact density; assemblage complexity; cultural affiliation; association with an important person or event; and ethnic importance.

The determination of significance for historic buildings, structures, objects and landscapes is based on age, location, context, association with an important person or event, uniqueness and integrity.

A site will be considered to possess ethnic significance if it is associated with a burial or cemetery; religious social or traditional activities of a discrete ethnic population; an important person or event as defined by a discrete ethnic population; or the belief system of a discrete ethnic population (City of San Diego 2011).

3.4.4.2 Determination of Significance under CEQA

The conclusions of significance under CEQA for the alternatives analyzed are summarized in Table 3.4-1. The records search and field reconnaissance surveys identified no significant historical resources within the APE. Based on the results of the surveys and record search, no unique resources as defined in Section 21083.2 of CEQA would be impacted with this project. However, because there is the possibility for buried resources, there is a potential for significant impacts, which necessitates construction monitoring as discussed in Section 3.4.5. In addition, NEPA requires minimization of impacts even if significant impacts are not identified.

 Table 3.4-1

 Summary of CEQA Significance for Historical Resources Impacts

Impact	Threshold	Central	Road	Bicycle	Western Eastern		Round-	Lower	No
			Capacity	Safety			about	Elevation	Build
Prehistoric Sites	Eligibility criteria above	SM*	SM*	SM*	SM*	SM*	SM*	SM*	NS
Historic Sites	Criteria above including age, context	NS	NS	NS	NS	NS	NS	NS	NS
Native American Values*	Site with ethnic significance	SM*	SM*	SM*	SM*	SM*	SM*	SM*	NS

NS = Not significant

SM = Significant and mitigable to below a level of significance

SU = Significant and unmitigable

* Although no unique or known historic properties would be affected, monitoring is required as mitigation for potentially significant impacts to possible buried resources.

3.4.5 Mitigation Measures

Construction monitoring by a qualified archaeologist and a Native American is required to address potential impacts to buried cultural resources in the alluvial deposits within the project area. The monitoring program shall be conducted according to City guidelines as follows.

His-1 Due to the potential for buried cultural resources to be encountered on-site, a qualified archaeological monitor and a Native American monitor shall be present during project-related grading activities, including on the JPA Mitigation Site and the additional mitigation area identified for the Roundabout Alternative, should that alternative be selected. This shall include removal of existing pavement and concrete hardscaping such as walkways. The following measures shall be implemented:

I. Prior to Permit Issuance

- A. Entitlements Plan Check
 - 1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for archaeological monitoring and Native American monitoring have been noted on the applicable construction documents through the plan check process.
- B. Letters of Qualification have been submitted to ADD
 - 1. The applicant shall submit a letter of verification to the Mitigation Monitoring Coordinator (MMC) identifying the Principal Investigator (PI) for the project and the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.
 - 2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG.
 - 3. Prior to the start of work, the applicant must obtain written approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

- A. Verification of Records Search
 - 1. The PI shall provide verification to MMC that a site-specific records search (¼-mile radius) has been completed. Verification includes, but is not limited to, a copy of a confirmation letter from South Coastal Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
 - 2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.
 - 3. The PI may submit a detailed letter to MMC requesting a reduction to the ¹/₄-mile radius.
- B. PI Shall Attend Precon Meetings
 - 1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector

(BI), if appropriate, and MMC. The qualified Archaeologist and Native American Monitor shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor.

- a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.
- 2. Identify Areas to be Monitored
 - a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored including the delineation of grading/excavation limits.
 - b. The AME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).
- 3. When Monitoring Will Occur
 - a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
 - b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

- A. Monitor(s) Shall be Present During Grading/Excavation/Trenching
 - 1. The Archaeological Monitor shall be present full-time during all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The CM is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances Occupational Safety and Health Administration safety requirements may necessitate modification of the AME.
 - 2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and MMC. If prehistoric resources are encountered during the Native American consultant/monitor's

absence, work shall stop and the Discovery Notification Process detailed in Section III.B-C and IV.A-D shall commence.

- 3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present.
- 4. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVRs shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (**Notification of Monitoring Completion**), and in the case of ANY discoveries. The RE shall forward copies to MMC.
- B. Discovery Notification Process
 - 1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to digging, trenching, excavating or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the RE or BI, as appropriate.
 - 2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
 - 3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.
 - 4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered.
- C. Determination of Significance
 - 1. The PI and Native American consultant/monitor, where Native American resources are discovered shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below.
 - a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required.
 - b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program which has been reviewed by the Native American consultant/monitor, and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground-disturbing activities in the area of discovery will be allowed to resume. Note: If a unique archaeological site is also an historical resource as defined in CEQA, then the limits on the amount(s) that a project applicant may be

required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply.

c. If the resource is not significant, the PI shall submit a letter to MMC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.

IV. Discovery of Human Remains

If human remains are discovered, work shall halt in that area and no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.5(e), the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken:

- A. Notification
 - 1. Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate Senior Planner in the EAS of the Development Services Department to assist with the discovery notification process.
 - 2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.
- B. Isolate Discovery Site
 - 1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenance of the remains.
 - 2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenance.
 - 3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin.
- C. If Human Remains ARE determined to be Native American
 - 1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, **ONLY** the Medical Examiner can make this call.
 - 2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.
 - 3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in

accordance with CEQA Section 15064.5(e), the California Public Resources and Health & Safety Codes.

- 4. The MLD will have 48 hours to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods.
- 5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if:
 - a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being notified by the Commission; OR;
 - b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, THEN,
 - c. In order to protect these sites, the Landowner shall do one or more of the following:
 - (1) Record the site with the NAHC;
 - (2) Record an open space or conservation easement on the site;
 - (3) Record a document with the County.
 - d. Upon the discovery of multiple Native American human remains during a ground disturbing land development activity, the landowner may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures the human remains and buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to Section 5.c., above.
- D. If Human Remains are **NOT** Native American
 - 1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial.
 - 2. The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC 5097.98).
 - 3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the San Diego Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with MMC, EAS, the applicant/landowner, any known descendant group, and the San Diego Museum of Man.

V. Night and/or Weekend Work

A. If night and/or weekend work is included in the contract

- 1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the preconstruction meeting.
- 2. The following procedures shall be followed.
 - a. No Discoveries In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSVR and submit to MMC via fax by 8 a.m. of the next business day.
 - b. Discoveries

All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction, and IV – Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery.

- Potentially Significant Discoveries
 If the PI determines that a potentially significant discovery has been made,
 the procedures detailed under Section III During Construction and IV Discovery of Human Remains shall be followed.
- d. The PI shall immediately contact MMC, or by 8:00 a.m. of the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.
- B. If night and/or weekend work becomes necessary during the course of construction
 - 1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
 - 2. The RE, or BI, as appropriate, shall notify MMC immediately.
- C. All other procedures described above shall apply, as appropriate.

VI. Post Construction

- A. Preparation and Submittal of Draft Monitoring Report
 - 1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix B/C) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring. It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe resulting from delays with analysis, special study results or other complex issues, a schedule shall be submitted to MMC establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met.

- a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report.
- b. Recording Sites with State of California Department of Parks and Recreation The PI shall be responsible for recording (on the appropriate State of California Department of Parks and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.
- 2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
- 3. The PI shall submit revised Draft Monitoring Report to MMC for approval.
- 4. MMC shall provide written verification to the PI of the approved report.
- 5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.
- B. Handling of Artifacts
 - 1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued.
 - 2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.
 - 3. The cost for curation is the responsibility of the property owner.
- C. Curation of artifacts: Accession Agreement and Acceptance Verification
 - 1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable.
 - 2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.
 - 3. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance

occurs in accordance with Section IV – Discovery of Human Remains, Subsection 5.

- D. Final Monitoring Report(s)
 - 1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.
 - 2. The RE shall, in no case, issue the Notice of Completion and/or release of the Performance Bond for grading until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

3.4.6 Significant and Unmitigable Impacts under CEQA

With implementation of the Archaeological Monitoring Program and the evaluation of any finds encountered during construction, as described above, all potentially significant impacts under CEQA would be mitigated to below a level of significance.



Property Boundaries

- 30221017 Assessor Parcel Number
 - Area of Potential Effect from Road/Bridge Construction
 - Area of Potential Effect from Proposed Wetland Mitigation Concept, (see Section 3.12)



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El Camino Real Road/Bridge Widening

Area of Potential Effect-Cultural Resources

Figure

3.4-1

3.5 FARMLANDS / AGRICULTURAL LANDS

This section evaluates the impacts of the proposed project on agricultural resources in the study area.

3.5.1 Regulatory Setting

Protection and management of agricultural resources is under the jurisdiction of the U.S. Department of Agriculture, the State Department of Conservation, and local agencies. The U.S. Department of Agriculture, under the Farmland Protection Policy Act of 1981, discourages activities that result in the permanent conversion of farmlands. The State Department of Conservation categorized agriculturally productive land throughout the state under their FMMP. The 2000 Important Farmland Map for San Diego County shows the following categories for the county:

- Prime Farmland
- Farmland of Statewide Importance
- Unique Farmland
- Farmland of Local Importance
- Grazing Land
- Urban and Built-Up Land
- Other Land
- Water

Prime Farmland and Farmland of Statewide Importance map categories are based on qualifying soil types, as determined by the NRCS as well as current land use (irrigated agriculture). Among the above categories, prime farmlands rank highest in importance as a resource. The Department of Conservation defines Prime Farmland as follows (Department of Conservation 1994):

Land with the best combination of physical and chemical features able to sustain long term production of agricultural crops. This land has the soil quality, growing season, and moisture supply needed to produce sustained high yields. Land must have been used for production of irrigated crops at some time during the two update cycles prior to the mapping date. It does not include publicly owned lands for which there is an adopted policy preventing agricultural use.

The County of San Diego is the primary local agency responsible for protecting agricultural land from conversion. Policies contained in the Conservation Element of the San Diego County General Plan are implemented to protect important agricultural resources. The San Dieguito River Regional Plan (City of San Diego 1984) notes that "the San Dieguito River basin is a valuable agricultural area of San Diego County . . . Agriculture in Subarea I (San Dieguito River Valley) is primarily located in the floodplains east of Interstate 5. A majority of land is used for grazing. The remaining areas are being utilized for row crops, including truck crops and tomatoes, nurseries, and horse operations."

The San Dieguito River Regional Plan contains a land use recommendation to "Encourage agricultural uses throughout the river valley by designating or, where existing, retaining agricultural zones in areas conducive to economically viable agricultural production, and where such uses are consistent with the natural scenic and recreational values of the planning area. Such areas should be designated for agriculture/open space in area/community or specific plans." In

the specific recommendations for its Subarea I (San Dieguito River Valley), the San Dieguito River Regional Plan contains a recommendation to "Promote agricultural use of the floodplains where such use would not significantly impact water quality and biological resources."

On the City of San Diego 2008 General Plan Land Use and Street System Map (Figure LU-2), land within the study area is not identified as agriculture. The nearest land with this City of San Diego classification is in San Pasqual Valley to the northeast. The 2008 General Plan map classifies most land adjacent to El Camino Real in the study area as Park, Open Space & Recreation. The NCFUA Framework Plan (City of San Diego 1995), which is the approved land use planning document for the project area, classifies land in Subarea II (west of El Camino Real) as Environmental Tier. Most of the properties in the City within the project area are zoned Agricultural Residential and Open Space-Floodplain; see Section 3.1.

3.5.2 Affected Environment

3.5.2.1 Existing Farmland Categories

The 2000 Important Farmland Map for San Diego County (California Department of Conservation 2002) indicates the categories of farmland for the study area as summarized in Table 3.5-1, which also lists the definition and general location of the category, and the project feature within the specific category. The portion of the Important Farmland Map that includes the project area is shown in Figure 3.5-1. There is no Prime Farmland within the study area. However, project features and proposed mitigation for biological resources would affect Farmland of Statewide Importance and Farmland of Local Importance, as noted in the completed Farmland Conversion Impact Rating form in Figure 3.5-2.

3.5.2.2 Land Currently Being Farmed

In the study area, the only land being farmed in 2004 was the property west of El Camino Real and south of the river. This area is classified as Farmland of Statewide Importance. This property was planted in tomatoes, potatoes, and miscellaneous vegetables. It is not identified as under a Williamson Act contract. The parcel covers about 77 acres and is split diagonally by a 150-foot-wide SDG&E easement for transmission towers and several buried fuel and gas pipelines.

The San Dieguito River Park JPA purchased this property for eventual restoration to sensitive biological resources, including wetlands, and the land is currently fallow. The purchase was partially funded by the State Coastal Conservancy. The Grant Agreement notes that "The real property was acquired by the grantee pursuant to a grant of funds from the State Coastal Conservancy, an agency of the State of California, for the purpose of public access, habitat and open space conservation and for future restoration and enhancement as part of the San Dieguito River Park; and no use of the real property inconsistent with that purpose is permitted." The Grant Agreement allows the current agricultural use as follows: "Prior to restoration and enhancement of the real property as part of the San Dieguito River Park, the grantee may lease all or a portion of the real property for agricultural purposes." Therefore, although agricultural use of the property is allowed in the short-term, the long-term intent for the public agency that now owns the property (the San Dieguito River Park JPA), is to implement habitat restoration, consistent with the Grant Agreement through which the JPA acquired funding for the property purchase.

Farmland Category	Definition of Category ¹	Location in Study Area	Project Feature in Farmland Category
Farmland of Statewide Importance	Land similar to Prime Farmland that has a good combination of physical and chemical characteristics for the production of agricultural crops. This land has minor shortcomings, such as greater slopes or less ability to store soil moisture than Prime Farmland. Land must have been used for production of irrigated crops at some time during the two update cycles prior to the mapping date. It does not include publicly owned lands for which there is an adopted policy preventing agricultural use.	Extending west of El Camino Real for about 1,015 meters (3,330 feet), starting from the south bank of the San Dieguito River and extending south beyond San Dieguito Road.	Western side of widened road, south of the bridge, depending on alternative, and wetlands mitigation for any alternative.
Farmland of Local Importance	Land of importance to the local agricultural economy as determined by each county's board of supervisors and a local advisory committee. For San Diego County, the definition is: Land that meets all the characteristics of Prime and Statewide, with the exception of irrigation. Farmlands not covered by the above categories but are of significant economic importance to the county. They have a history of good production for locally adapted crops. The soils are grouped in types that are suited for truck crops (such as tomatoes, strawberries, cucumbers, potatoes, celery, squash, romaine lettuce, and cauliflower) and soils suited for orchard crops (avocados and citrus). It does not include publicly owned lands for which there is an adopted policy preventing agricultural use.	In the San Dieguito River channel west of El Camino Real. From the river to south of San Dieguito Road east of El Camino Real. The category extends eastward for more than 760 meters (2,500 feet).	Not applicable. The area east of existing El Camino Real between the river and San Dieguito Road was converted to golf course in 2003, and farming does not occur in the river channel.
Urban and Built- Up Land	Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel.	From Via de la Valle to the north bank of the San Dieguito River west of El Camino Real. From the north edge of Polo Club field to the north bank of the San Dieguito River east of El Camino Real.	Eastern and western sides of widened road. Recreated drainage ditch parallel to El Camino Real, depending on alternative.
Other Land	Land which does not meet the criteria of any other category.	Privately-owned parcel south of Via de la Valle, north of Polo Club fields, and east of El Camino Real.	Eastern side of widened El Camino Real, including drainage ditch. Widened Via de la Valle and parallel drainage ditch.

Table 3.5-1Farmland Categories in the Study Area

¹ California Department of Conservation 1994

3.5.3 Impacts

Issues to be addressed are the following:

Would the proposed project result in the conversion of agricultural land to a nonagricultural use or impairment of the agricultural productivity of agricultural land?

The intensity and severity of potential impacts to farmlands/agricultural lands are discussed below for the build alternatives. Conclusions of the significance of farmlands/agricultural lands impacts under CEQA are discussed separately in Section 3.5.4.

3.5.3.1 Issue 1a: Conversion of Agricultural Land to a Non-Agricultural Use

Impacts from Road Widening. Several of the alternatives would require land from the JPA property that was being farmed in 2003. The alternative that would require the most land for the road widening would be the Western Alignment Alternative, because this alternative would be shifted to the west to avoid the drainage ditch on the east side of El Camino Real, would involve a full road cross section, and would raise the road on embankment, which would slope to existing grade at 2:1 side slopes. In terms of impacts from the proposed road widening, only the Western Alignment Alternative would encroach west of the existing City slope easement along the west side of El Camino Real. The slopes for the raised roadway would extend a maximum of 60 feet west of the bottom of the existing slope near the bridge, but the area affected would taper off at San Dieguito Road. The length of agricultural area affected by the road alignment is a maximum of 650 feet, and the estimated field area affected is less than 1 acre. The small strip of existing agricultural land affected by road widening for the Western Alignment Alternative is not a substantial portion of the agricultural operation that occurred in the past, which covered more than 50 acres. Therefore, the road widening would not affect agricultural use of the land, even if such uses were still occurring.

The other build alternatives would not affect the fields for the road widening because the area needed for embankment slopes would not encroach past the existing City of San Diego slope easement.

Impacts from Biological Resources Mitigation. The City of San Diego conducted an objective mitigation site evaluation process, and identified the JPA property that was being farmed as a desirable location for mitigation of impacts to clapper rail habitat in the San Dieguito River and impacts to other wetlands due to the project. The acreage of wetland creation and enhancement that would be needed to mitigate for project impacts would depend on the alternative selected (see Section 3.12: Biological Resources). Implementation of habitat restoration on the property would be consistent with the long-term plans for the property and the Grant Agreement between the JPA and the State Coastal Conservancy, which provided funding for the property purchase. The biological resources mitigation for El Camino Real Bridge/Road Widening Project would eliminate the ability to conduct agricultural use on the area needed for implementation of the wetlands creation/enhancement concept plan, which would occupy the part of the property east of the utility corridor and west of existing El Camino Real, a total of approximately 22 acres.

A request for a Farmland Conversion Rating was sent to the NRCS in July 2005. The District Conservationist completed form AD-1006 as requested. The completed form is presented as Figure 3.5-2. The NRCS determined there are approximately 28 acres of Statewide and Local Important Farmland on the parcel, and the conversion would represent 0.025 percent of farmland

in the County. On a scale of 100 points, the NRCS assigned a value of 57 for the Land Evaluation Criterion Relative Value of Farmland to be Converted. The total site assessment value developed for the farmland on the mitigation site was 59 points. The sum of these two values, representing the level of significance of the proposed farmland conversion, was 116. According to Appendix C of the Caltrans Environmental Handbook Volume 4 (Farmland: Instructions for Completing the Form AD-1006), sites receiving a total score of less than 160 points shall be given minimal level of consideration for protection and no further alternative analysis need be evaluated for farmland issues. Since the entire 75-acre site was analyzed for impacts resulting from conversion and was found to have minimal significance, it is reasonable to state that converting only approximately 22 acres of the 75-acre parcel would also be given a "minimal level of consideration."

Conclusions. Implementing wetlands mitigation on part of the JPA property would eliminate the ability to conduct agricultural activities in the affected area. However, the converted property represents a very small percentage of farmable land in the County. In addition, based on consultation with the NRCS and completion of Form AD-1006, the farmland rates "minimal level of consideration for protection."

Furthermore, implementation of mitigation on the JPA property would not be converting agricultural land that is intended to be farmed in the long term. The long-term plan for the property is public access, habitat and open space conservation and future restoration and enhancement as part of the San Dieguito River Park, in accordance with the Grant Agreement between the JPA, a public agency and owner of the property, and the State Coastal Conservancy, which provided funding for the land purchase. Although the State Important Farmlands map indicates the area west of El Camino Real and south of the river is Farmland of Statewide Importance, the California Department of Conservation (1994) definition of these farmlands excludes "publicly owned lands for which there is an adopted policy preventing agricultural use." The policy embodied in the Grant Agreement is intended to replace agricultural activities on the property with habitat restoration and enhancement, and preclude use of the real property inconsistent with that purpose.

3.5.3.2 Issue 1b: Impairment of Agricultural Productivity

In accordance with the above discussion, the build alternatives for the proposed project would impair the agricultural productivity of land in the study area. However, based on consultation with the NRCS and completion of Form AD-1006, the farmland rates "minimal level of consideration for protection." In addition, the property is not intended to be farmed in the long-term, per the Grant Agreement between the JPA, a public agency and owner of the property, and the State Coastal Conservancy, which provided funding for the land purchase.

3.5.3.3 No Build Alternative

Under the No Build Alternative, none of the project components that could disturb existing farmland would be constructed, including the wetlands mitigation. Impacts to existing or potential activities on farmland/agricultural lands would not occur. However, the plan for the area that was being farmed is public access, habitat and open space conservation and restoration and enhancement as part of the San Dieguito River Park, in accordance with the Grant Agreement between the JPA, a public agency and owner of the property, and the State Coastal Conservancy. Therefore, under the No Build Alternative, the ability to conduct agricultural activities on the property would eventually end.

3.5.4 Significance of Farmlands / Agricultural Lands Impacts under CEQA

3.5.4.1 CEQA Significance Thresholds

The thresholds for significant agricultural impacts under CEQA are provided in the City of San Diego Significance Determination Thresholds (City of San Diego 2011), as follows:

If the project would convert a substantial amount of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (herein collectively referred to as "Farmland") as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use.

If the project would conflict with existing zoning for agricultural use, or Williamson Act contract.

If the project would involve other changes in the existing environment which due to their location or nature, could result in conversion of Farmland to non-agricultural use.

3.5.4.2 Determination of Significance under CEQA

The conclusions of significance under CEQA for the alternatives analyzed are summarized in Table 3.5-2 and discussed below.

Impacts to Farmland. None of the build alternatives would impact a substantial amount of designated Farmland, because the percentage of farmland in the County to be converted for the wetlands mitigation program is only 0.025 percent.

Conflicts with Zoning. The proposed project, including the wetlands mitigation program would not cause a conflict with existing zoning because the parcels affected are zoned Agricultural Residential, which is defined as minimum 10-acre lots, with natural resource preservation permitted.

Conversion of Farmland. The conversion of the lands west of El Camino Real mapped as Farmlands that had been farmed is also not significant because the total points on the Farmland Conversion Impact Rating Form AD-1006 were less than 160. In addition, the JPA property is now publicly owned lands for which there is an adopted policy (Grant Agreement) preventing agricultural use in the long-term.

Impact	Threshold	Central	Road Capacity	Bicycle Safety	Western	Eastern	Round- about	Lower Elevation	No Build
Impacts to Farmland	Impacts to substantial Farmland as defined above	NS	NS	NS	NS	NS	NS	NS	NS
Zoning or Williamson Act contracts	Conflict with agricultural use zoning or Williamson Act Contract	NS	NS	NS	NS	NS	NS	NS	NS
Conversion of Farmland	Conversion of Farmland as defined above to non- agricultural use	NS	NS	NS	NS	NS	NS	NS	NS

 Table 3.5-2

 Summary of CEQA Significance for Farmland/Agricultural Land Impacts

NS = Not significant

SM = Significant and mitigable to below a level of significance

SU = Significant and unmitigable

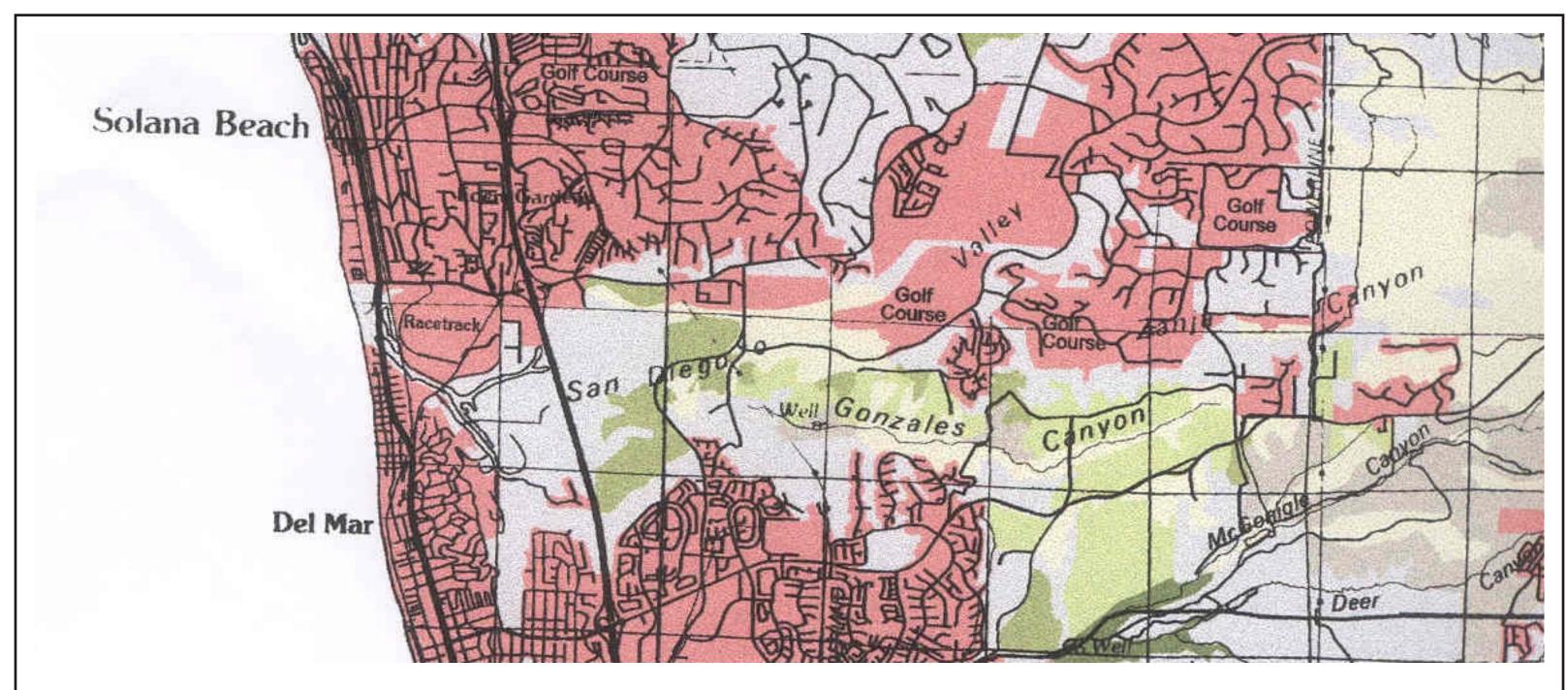
3.5.5 Mitigation Measures

No impacts would be significant under CEQA. No mitigation measures are necessary for any of the build alternatives.

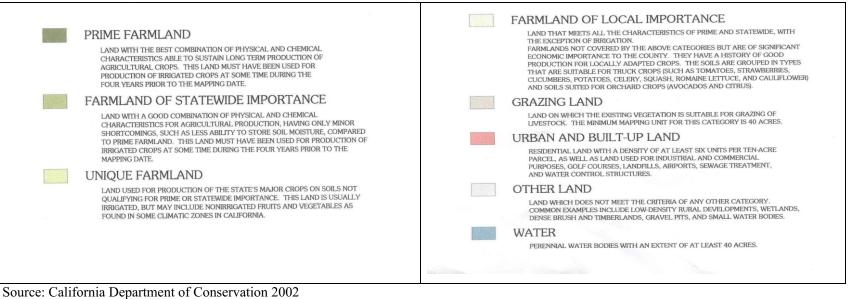
3.5.6 Significant and Unmitigable Impacts under CEQA

No significant impacts would occur.

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LEGEND



El Camino Real Road / Bridge Widening

Important Farmland in the Project Area

JOB NO	14752
FILE:	\d14752\EIR\exhibits\fig3-5-1.dgn
DATE:	NOVEMBER, 2005



	U.S. Departmen	nt of Agric	ultur	re						
FARMLAND	CONVER	SION	IM	PAC	ΓF	RATIN	G			
PART I (To be completed by Federal Agency) Date				Date Of Land Evaluation Request 07-29-05						
Name Of Project El Camino Real	Road Bridge	Federal Ag	gency	Involved,	~	1 Wich	was	An	liministra	
El Camino Neay		County An	d Sta	te c	(a	FEIGH	war	1. 1	in since	
Proposed Land Use Habitat Resta	Jan Dipro California									
PART II (To be completed by NRCS)		Date Requ	Jest R	teceived By	NRC	s 8/11	05			
Does the site contain prime, unique, statewide o (If no, the FPPA does not apply do not comp	or local important farm lete additional parts of	land? of this form,).		10	Acres Irrigate	d Ave	80	m Size	
Major Crop(s)	Farmable Land In Gov		n	1942 1956		Amount Of F				
TOMATOES, POTATOES, MISC VEG.	Acres: 112,97			% 4.2		Acres: 9			% 3.4	
Name Of Land Evaluation System Used	Name Of Local Site A	ssessment S	Syster	m		Date Land Ex			d By NRCS	
alifornia - Storie System	NONE						3/11/0			
PART III (To be completed by Federal Agency)			-	Site A	1	Alternative Site B		ting te C	Site D	
A. Total Acres To Be Converted Directly				36	+	Site D		0.0	Old D	
B. Total Acres To Be Converted Indirectly				37						
C. Total Acres in Site			0.0		0.0)	0.0		0.0	
PART IV (To be completed by NRCS) Land Evalu	ation Information			110						
A. Total Acres Prime And Unique Farmland				0	+					
B. Total Acres Statewide And Local Important	Farmland		3	28.2	-		-			
C. Percentage Of Farmland In County Or Local		nverted	-	.025	-			_		
D. Percentage Of Farmland In Govt. Jurisdiction With	n Same Or Higher Relati	ve Value	DA	FTA NOT	A	VAILABLE				
PART V (To be completed by NRCS) Land Evalu			1	-			0		0	
Relative Value Of Farmland To Be Conver	ted (Scale of 0 to 10	0 Points)		57	0		0		0	
PART VI (To be completed by Federal Agency) Site Assessment Criteria (These criteria are explained in i	7 CFR 658.5(b)	Maximum Points								
1. Area In Nonurban Use	STRUCT STRUCTURE		1	111			111			
2. Perimeter In Nonurban Use			1	4						
3. Percent Of Site Being Farmed				20						
4. Protection Provided By State And Local Go	vernment			0						
5. Distance From Urban Builtup Area				-						
6. Distance To Urban Support Services			_	-						
7. Size Of Present Farm Unit Compared To Av	verage		-	9	-			_	-	
8. Creation Of Nonfarmable Farmland			_	0	-					
9. Availability Of Farm Support Services			-	2	-	-				
10. On-Farm Investments			-	10	-	_	-			
11. Effects Of Conversion On Farm Support Se	rvices	1.8	-	0	-		-			
12. Compatibility With Existing Agricultural Use		112/24	-	0	-		-			
TOTAL SITE ASSESSMENT POINTS		160	0	59	0		0		0	
PART VII (To be completed by Federal Agency)										
Relative Value Of Farmland (From Part V)			0	57	0		0		0	
Total Site Assessment (From Part VI above or a local site assessment)		160	0	59	0		0		0	
TOTAL POINTS (Total of above 2 lines)			0	116	0		0		0	
TOTAL POINTS (Total of above 2 lines) 260 Site Selected: Date Of Selection										

(See Instructions on reverse side) This form was electronically produced by National Production Services Staff	Form AD-1006 (10-83)
	El Camino Real
	Road/Bridge Widening
	Completed Farmland
	Conversion Impact
	Rating Form
	Figure
	3.5-2
M:\JOBS2\4256.1\env\graphics\EIR\fig3.5-2.ai 5/7/2012	

3.6 PUBLIC UTILITIES/SERVICES

This section evaluates the impacts of the proposed project on public utilities and services that are in the project area. The human and natural environment of a community can be impacted by the lack of sufficient utilities and services. Deficiency of public services or utilities or interruptions in services may cause a decrease in the quality of life for an area, which creates the need for construction of new facilities and therefore the potential for environmental impacts. The following public utilities are discussed in this section:

- Electrical Power
- Natural Gas
- Solar Energy
- Communications Systems
- Solid Waste Generation/Disposal
- Water and Water Conservation
- Sewer

The City of San Diego Significance Determination Thresholds (City of San Diego 2011) state that the focus of analysis of public services effects should be on if the project would have an effect upon, or result in a need for, new or altered governmental services for police protection, fire/life safety protection, libraries, parks or other recreational facilities, maintenance of public facilities (including roads), and schools. If so, the focus of the analysis should be on the physical impacts of constructing the public service facilities. This entire environmental document addresses the physical impacts of constructing and operating a widened roadway, but other public services issues are not applicable, as summarized below.

The proposed project would not add to the population or construct buildings, and so would not increase the need for police protection facilities, fire/life safety protection facilities, libraries, parks or other recreational facilities, or schools. The response times for police protection, fire protection, or emergency medical services could be affected during construction if road closures or detours were needed. However, the construction phasing for most of the alternatives for the road/bridge widening is planned to occur one side at a time, with a complete two-lane bridge and raised road constructed independently of the existing bridge and road in the first phase, followed by demolition and construction of the other two-lane side. Therefore, a two-lane transportation facility with essentially the same capacity as under existing conditions would be open during the entire construction process, and response times would not be affected. For the Eastern Alignment Alternative and Roundabout Alternative, the entire 4-lane road and bridge from the bridge northward could be constructed without affecting existing El Camino Real.

There would be no impacts on response times after project completion because response times either would improve with the general improvement in level of service on the road and at key intersections (for the full widened roadway alternatives), or would be the same as with the No Build Alternative (narrow roadway alternatives). The roadway would be wider, so maintenance would be incrementally greater, but not substantially different from current maintenance responsibilities because a road already exists. For all alternatives, there would be a benefit to response times and maintenance in having the road and the bridge raised above the 100-year flood level during wet conditions, when El Camino Real may otherwise be impassable or damaged due to flooding. The remainder of this section is focused on public utilities.

3.6.1 Regulatory Setting

CEQA Guidelines Section 15126.2 (a) addresses the analytical approach that must be undertaken when identifying and evaluating environmental impacts. This section lists public services, when relevant, among the issue areas that should be discussed in an EIR. As noted above, in the case of the proposed project, public services would not be affected during construction, and an improvement in response time would occur after project completion for the full widened roadway alternatives, or be the same as with the No Build Alternative (narrow roadway alternatives).

Another regulatory issue involves the construction of public works facilities within public roadways. Public utilities, such as water and gas distribution lines, are often placed within streets that are franchised public right of way. Therefore, disturbing a street or utilities underneath could affect utility levels of service. This situation necessitated certain regulations regarding construction of public works in roadways. Pursuant to the Public Utilities Code, "A district may construct works across or along any street or public highway, or over any of the lands which are the property of the state, and it shall have the same rights and privileges appertaining thereto as are granted to municipalities within the State. The district shall restore any such street or highway to its former state as near as may be, . . . and shall not use it in a manner to unnecessarily impair its usefulness" (Public Utilities Code, Section 12808).

3.6.2 Affected Environment

3.6.2.1 Existing Public Utilities

Typically for environmental analysis, inquiries are made of utility providers to provide general maps identifying which facilities are within a project study area. For the City of San Diego El Camino Road/Bridge Project, information on utilities in the project area was requested from San Diego Gas & Electric (SDG&E), Pacific Bell, and Time Warner Cable via letters in June, 2002. Maps showing electrical, gas, and a fuel line in the project area were received from SDG&E in July, 2002. Maps showing CATV (cable) facilities in the area were received from Time Warner Cable in June, 2002. No response was received from Pacific Bell. Water and sewer lines were identified from City of San Diego Sewer Field Book and Water Field Book maps for the area. The following summary of utilities is based on this mapped information received and field observations.

Electrical Power. Overhead electrical power is suspended on 10 power poles off the west shoulder of El Camino Real from Via de la Valle to south of San Dieguito Road. An eleventh power pole is on the north edge of Via de la Valle at the intersection with El Camino Real. A second electrical power line is mapped in El Camino Real at Mary's Tack and Feed to Via de la Valle. Overhead power is also along the south edge of Via de la Valle in the study area. Right of way for larger overhead electrical power mounted on towers crosses El Camino Real south of San Dieguito Road, and crosses northwest through the agricultural fields purchased by the San Dieguito River Park JPA.

Fuel and Natural Gas. A 30-inch diameter, 595-psi force main labeled "San Diego Oil Pipeline" is shown along the northeast edge of the large power line right of way in maps provided by SDG&E. In this same area, the City of San Diego Sewer and Water Field Books indicate two fuel pipelines, one 16 inches and one 10 inches in diameter. The Vesting Tentative Map for the Rancho Valley Farm development previously proposed for the tomato fields purchased by the JPA indicated two fuel lines along the northeastern edge of this power line right of way, and a 30-inch, high-pressure gas line in the middle.

A 2-inch to 4-inch high-pressure gas line is along the north edge of Via de la Valle at the intersection with El Camino Real, and runs eastward past El Camino Real North. A 2-inch high-pressure gas line is perpendicular to Via de la Valle at this intersection, extending to the south of the road.

A 3-inch high-pressure gas line extends westward in Via de la Valle from the intersection with the affected segment of El Camino Real.

A 6-inch high pressure (400 psi) gas line is in the southern half of Via de la Valle, approximately 17 feet from the centerline, extending eastward from El Camino Real to east of the intersection with the northern extension of El Camino Real.

A 6-inch high pressure (400 psi) gas line is 12 to 15 feet west of the centerline of El Camino Real, running south from Via de la Valle to south of the bridge. The gas line is attached to the bridge with clevis type hangers underneath the west overhang, then continues southward.

Solar Energy. The City of San Diego Significance Determination Thresholds (City of San Diego 2011) note that with respect to solar energy, projects that would result in substantial shading of roofs as to preclude future installation of solar systems may be considered to have significant environmental impacts. The proposed project would not include any components that would shade roofs. Therefore, this issue is not discussed further.

Communications Systems. Communication facilities in the area are provided by multiple companies throughout the San Diego region. These communication lines include underground and overhead installations for telephone, cable TV, and other services, including computer, internet and security connection systems. The installations themselves can be wire, fiber-optic, or a combination of these materials, typically overhead routed along power poles or in underground duct facilities. Time Warner Cable maps indicate fiber optic cable is in Via de la Valle west of El Camino Real, in El Camino Real south to San Dieguito Road, turning east in San Dieguito Road, then south in Old El Camino Real. Overhead cable is shown on joint poles with telephone in El Camino Real from Via de la Valle to San Dieguito Road. Cable is in Via de la Valle, and line is shown between telephone company poles along the south edge of Via de la Valle. Cable also runs north in De la Valle Place.

Solid Waste Generation/Disposal. Refuse, recyclable, and food waste collection is provided primarily by private companies under franchise agreements with jurisdictions in the region, although the City of San Diego provides recyclable material and refuse collection to certain waste generators within the City that are situated along public streets. Within the City of San Diego, refuse generators that are not served by the City may select from any of several franchised haulers for refuse and recyclable material collection. For this project, the City will retain any of the City's franchised haulers to serve the project during construction.

Solid waste is taken to either the City's West Miramar Landfill (Miramar Landfill), located north of State Route 52 (SR-52); the Sycamore Sanitary Landfill (Sycamore Landfill), located east of Interstate 15 (I-15); or the Otay Landfill, located north of Interstate 905 (I-905). Based on current and projected disposal rates, and permitted disposal limits, the San Diego region is anticipated to exceed landfill capacity within the next few years unless landfill expansions are approved. Waste from constructing the project is expected to be disposed of primarily at Miramar Landfill; however, information on permitted capacity for all three landfills was obtained through the Solid Waste Information System in the event that solid waste is transported to other landfills.

According to the Solid Waste Information System, the Miramar Landfill is permitted to receive 8,000 tons per day. On average, it receives approximately 2,655 tons per day Monday through Friday, and substantially less on weekends. Its remaining capacity is approximately 15.5 million cubic yards (cy). The estimated closure date of the Miramar Landfill is August 2025. The Sycamore Landfill is permitted to receive a maximum of 3,800 tons per day. Per the current permit, the Sycamore Landfill has a remaining capacity of 42.2 million cy, and would close December 2031. The Otay Landfill is permitted to receive 5,830 tons per day, and has a remaining capacity of 24.5 million cy and a projected closure date of April 2021 (State of California 2014).

Water. Water facilities in the project area are owned and operated by the City of San Diego. The Via de la Valle pipeline, 24-inch cement mortar lined and coated (CMLC) steel pipeline is in Via de la Valle west of El Camino Real, starting at Santa Fe Downs Square. No water lines are indicated in El Camino Real. In a comment letter on the 2006 Draft EIR, the Santa Fe Irrigation District (SFID) noted that they have an existing 10-inch-diameter asbestos concrete water line in Via de la Valle between El Camino Real North to about 500 feet west of the intersection of Via de la Valle and El Camino Real. This serves the commercial area on the north side of Via de la Valle as well as Mary's Tack and Feed and the All Creatures Animal Hospital. The SFID serves fire protection in those areas. This water line was installed in about 1980 and does not need to be replaced. The commercial area at Via de la Valle Place is in the SFID. The comment letter noted that SFID would want to be consulted regarding replacement of the storm drain under Via de la Valle at El Camino Real North to insure that their water line is protected in place or relocated appropriately if it is in conflict with the needed storm drain improvements. The comment letter also noted that SFID is evaluating the viability of providing recycled or raw water in the project area, and may be interested in coordinating installation of a system in connection with the proposed road/bridge project.

Sewer. Sewer lines are generally part of a large network that collects and transports raw sewage from various sources such as residences, public facilities and communities to a sewage treatment plant for processing. Within the project area, the City owns and maintains the sewer system. An 8-inch polyvinyl chloride (PVC) sewer pipeline runs westward in Via de la Valle east of El Camino Real, and a 12-inch PVC sewer runs eastward in Via de la Valle west of El Camino Real. The two lines meet at El Camino Real, and an 18-inch PVC sewer extends southward for approximately 300 feet on the east side of the road right of way. An 8-inch PVC sewer and a 10-inch sewer join the 18-inch pipeline from the east and west, respectively, at this point. The 18-inch line continues southward for another 800 feet. The sewer line then leaves the road and heads southeast, crosses under the river approximately 330 feet east of the bridge, and enters Pump Station 79 near Old El Camino Real and San Dieguito Road. The City of San Diego Sewer Field Book shows a 10-inch vitrified clay (VC) sewer crossing the expanded Fairbanks Ranch Country Club golf course area about 250 feet north of San Dieguito Road. This sewer also flows into Pump Station 79.

3.6.3 Impacts

Issues to be addressed are the following:

Issue 1: What are the impacts of the project on public utilities during construction?

Issue 2: What are the impacts of the project on public utilities after completion?

These issues were added to the other issues included in the Notice of Preparation and Scoping Letter in order to fully address potential impacts of the project, and in particular, to address issues raised by SDG&E in their response to the Notice of Preparation for the 2006 Draft EIR.

3.6.3.1 Issue 1: Impacts on Public Utilities/Services during Construction

Electrical Power. Overhead power on power poles along the west side of El Camino Real would be affected by all build alternatives except the Eastern Alignment Alternative and the Roundabout Alternative. These poles would be relocated as needed in coordination with SDG&E. Overhead power poles on the south edge of Via de la Valle would be relocated as needed in coordination with SDG&E. No interruption in service would be anticipated because the new poles would be installed along the first half of widened El Camino Real to be constructed (depending on the alternative) and along the southern edge of the widened portion of Via de la Valle before the existing poles would be removed and the new portions opened for traffic. The following measures required by SDG&E would be incorporated into the project for any build alternative:

- Design of access roads and grading shall comply with SDG&E Guidelines where activities encroach into any transmission rights of way.
- Prior to grading in SDG&E right-of-way, a "permission to grade" letter shall be obtained from SDG&E.
- Changes in grade shall not direct drainage in a manner that increases the potential for erosion around SDG&E facilities or access roads.
- Project grades shall be coordinated with SDG&E to assure clearances as required by California Public Utilities Commission General Order 95.
- All project plans that affect or could affect SDG&E facilities and/or rights of way shall be coordinated with Sempra Energy Utilities, Land Management.

Fuel and Natural Gas. The fuel lines in the large power line right of way extending diagonally across the agricultural fields now owned by the JPA would not be affected by the proposed road widening, bridge replacement, or wetlands mitigation installation. The gas lines in Via de la Valle would not be affected by the widening construction because the elevation of the road would remain the same. Widening for most of the build alternatives would extend southward from the existing edge of the road, except for the Roundabout Alternative, which would involve construction of pavement for roundabouts and extended driveways across certain locations of Via de la Valle. The gas line would be mapped on plans for any alternative that would involve construction in its alignment.

For all of the build alternatives except the Eastern Alignment Alternative and Roundabout Alternative, the gas line in El Camino Real would have to be relocated vertically and possibly horizontally, depending on the preference of SDG&E, because there would be up to 10 feet additional cover on the pipeline when the construction is completed For these alternatives, the relocated gas line would be constructed in the first half of the roadway and bridge to be constructed, so there would be no interruption in service due to construction within existing El Camino Real. The bridge would be constructed with utility cells that would allow protected placement of utilities within the structure of the bridge. Removal of the gas line from its exposed position hanging on the side of the bridge, and placement in a protected utility cell within the bridge structure would be beneficial.

For the Eastern Alignment Alternative and Roundabout Alternative, the gas line would be relocated to the new road alignment east of existing El Camino Real in order to be placed in a utility cell in the new bridge and to remain in public right of way in the new alignment of the road. The relocated gas line would be constructed in the new road before the existing road would be closed, so there would be no interruption in service due to construction for this alternative. As with the other alternatives, removal of the gas line from its exposed position hanging on the side of the bridge, and placement in a protected utility cell within the bridge structure would be beneficial.

Communications Systems. Fiber optic cable in Via de la Valle would not be affected by the proposed project because the elevation of the road would remain the same, and all widening would extend southward from the existing edge of the road, except for the Roundabout Alternative, which would involve construction of pavement for roundabouts and extended driveways across certain locations of Via de la Valle. The fiber optic cable would be mapped on plans for any alternative that would involve construction in its alignment.

For all of the build alternatives except the Eastern Alignment Alternative and Roundabout Alternative, the fiber optic cable in El Camino Real would need to be relocated vertically because there would be up to 10 feet additional cover on the pipeline when the construction is completed. The relocated cable would be constructed in the first half of the roadway and bridge to be constructed, so there would be no interruption in service due to construction. Overhead cable and telephone on the joint poles along El Camino Real would be relocated as discussed for the electrical power.

For the Eastern Alignment Alternative and Roundabout Alternative, the fiber optic cable would be relocated to the new road alignment east of existing El Camino Real in order to be placed in a utility cell in the new bridge and to remain in public right of way in the new alignment of the road. The relocated fiber optic line would be constructed in the new road before the existing road would be closed, so there would be no interruption in service due to construction.

Solid Waste. Implementation of Waste Management Plans for private projects and compliance with Section 802 of the White Book for City projects would assure that the overall waste produced is reduced to sufficiently comply with the 75 percent waste reduction targets established in the Public Resources Code and that impacts to services would not be significant. Direct impacts could result from projects that include the construction, demolition, or renovation of 1,000,000 square feet or more of building space. Cumulative impacts could result from projects that include the construction of 40,000 square feet or more of building space. Both types of projects would require the preparation of a waste management plan for private projects. The thresholds require that public projects adhere to City of San Diego Administrative Regulations and project specifications that require that the overall waste produced is reduced sufficiently to comply with waste reduction targets established in the Public Resources Code. Furthermore, projects complying with the City of San Diego Administrative Regulations are not required to prepare a Waste Management Plan.

Water and Water Conservation. The water line in Via de la Valle would not be affected by the proposed project because the elevation of the road would remain the same, and all widening would extend southward from the existing edge of the road, except for the Roundabout Alternative, which would involve construction of pavement for roundabouts and extended driveways across certain locations of Via de la Valle. The water line would be mapped on plans for any alternative that would involve construction in its alignment. If any water lines or other infrastructure would be in conflict with the proposed project, including from replacement of the storm drain crossing under Via de la Valle at El Camino Real North, the infrastructure would be protected in place or relocated appropriately in coordination with the owner/operating agency.

A water availability analysis under Senate Bill 610 and Senate Bill 221 is not required for the proposed project because it does not involve any of the types of development listed in the City of San Diego Significance Determination Thresholds (City of San Diego 2011), such as residential, commercial, shopping centers, or mixed use. In addition, irrigation needs for landscaping are expected to be minimal, and water demands of the project during and after construction would not demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project.

The project would not use excessive amounts of potable water. Minor volumes of water may be needed during construction, for example, for dust control. Landscaping in the parkways would utilize drought resistant vegetation, and revegetation/wetlands creation for biological resources mitigation would be designed to be naturally sustaining. No impacts on water conservation are expected.

Sewer. For all build alternatives except the Eastern Alignment Alternative and Roundabout Alternative, the existing sewer would need to be encased for additional protection because of the additional fill being placed on the existing road alignment. If determined to be desirable by the City, the sewer may be relocated horizontally as well, since sewers are typically placed near the centerline of streets, and must have adequate vertical and horizontal separation from water pipelines. The appropriate location will be determined in coordination with the City of San Diego upon selection of a build alternative. In any case, the sewer relocation would be accomplished without an interruption in service, either by building the replacement pipeline a segment at a time and pumping sewage flows around the construction area, or by installing a new pipeline in a different location before the existing pipeline would be abandoned and removed.

For the Eastern Alignment Alternative and Roundabout Alternative, the sewer would be relocated so it would remain in public right of way. The relocated sewer would be constructed in the new road before the existing road would be closed, so there would be no interruption in service due to construction.

3.6.3.2 Issue 2: Impacts on Public Utilities/Services after Completion

For all of the build alternatives, there would be no adverse impacts on public utilities or services after completion of construction. The removal of the gas line from potential harm during flooding would be a project benefit common to all build alternatives.

3.6.3.3 No Build Alternative

Under the No Build Alternative, none of the project components that could disturb existing utilities would be constructed. Impacts to public utilities would not occur.

3.6.4 Significance of Public Utilities / Services Impacts under CEQA

3.6.4.1 CEQA Significance Thresholds

The City of San Diego Significance Determination Thresholds (City of San Diego 2011) state that each utility provider establishes its own threshold criteria for utility capacity and service expansion, and the extension, expansion, rerouting, and construction of new public and private utility needs are generally addressed on a project-by-project basis. With one exception (energy conservation), the analysis of impacts related to public and private utilities should focus on the physical impacts associated with their installation. The proposed project would not involve a change in capacity or expansion of any utility, but some facilities may need to be relocated, as previously discussed.

The thresholds note that the following questions should be considered in determining whether the utility work could have significant environmental impacts:

Would the removal, construction, and /or relocation of the utility:

- Be compatible with existing and adjacent land uses?
- Change drainage or affect water quality/runoff?
- Affect air quality?
- Affect biological resources including habitat?
- Have a negative aesthetic effect?
- Impact historical resources?
- Increase noise levels to sensitive receptors?

Other questions listed in the guidelines to be considered in evaluating significance are would the proposal:

- Result in a need for new systems, or require substantial alterations to existing utilities, the construction of which would create physical impacts?
- Result in the use of excessive amounts of fuel or energy?
- Result in the use of excessive amounts of power?
- Use of excessive amounts of water?
- Landscaping which is predominantly non-drought resistant vegetation?

The guidance also notes that direct impacts to electrical and natural gas facilities are addressed and mitigated by SDG&E at the time incoming development projects occur and are not typically evaluated by City staff.

3.6.4.2 Determination of Significance under CEQA

The conclusions of significance under CEQA for the alternatives analyzed are summarized in Table 3.6-1. Impacts from the relocation of public utilities that may be needed for any of the build alternatives would not be significant. For all of the build alternatives, any relocation of public utilities would occur in the newly constructed roadway and bridge. The relocated facilities would have the same capacity and placement as existing facilities (i.e., buried facilities would be buried and overhead power and communication lines would be placed on relocated poles). Therefore, utility relocation would occur within the footprint already disturbed by road construction, would not cause independent impacts, and would result in the same physical appearance as under existing conditions. No new systems are proposed for the project, and there would be no excessive use of fuel, energy, power, or water associated with the construction or long-term operation of the relocated utilities. Landscaping would not be associated with utility relocation, as the new facilities would be placed in the roadway (buried pipelines) or off the edge of the road (power poles). Measures requested by SDG&E in response to the Notice of Preparation would be incorporated into the project, as noted in Section 3.6.3.1.

3.6.5 Mitigation Measures

No impacts would be significant under CEQA. No mitigation measures are necessary for any of the build alternatives.

3.6.6 Significant and Unmitigable Impacts under CEQA

No significant impacts would occur.

Table 3.6-1 Summary of CEQA Significance for Public Utility Impacts

Impact	Threshold	Central	Road	Bicycle	Western	Eastern	Round-	Lower	No
			Capacity	Safety			about	Elevation	Build
Impacts	Land use compatibil-ity; adverse	NS	NS	NS	NS	NS	NS	NS	NS
from utility	environmental impacts, excessive use of								
relocation	fuel, energy, power, or water; installation of								
	non-drought tolerant landscaping.								

NS = Not significant

SM = Significant and mitigable to below a level of significance <math>SU = Significant and unmitigable

3.7 HYDROLOGY/WATER QUALITY

In accordance with the City's CEQA significance determination thresholds (City of San Diego 2011), the purposes of the hydrologic analysis are to determine if the project could substantially increase impervious surfaces and associated runoff to the detriment of upstream or downstream properties, and to assess if there would be substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes. This section is based on a series of hydrologic and hydraulic studies that have been prepared during the ongoing design of this project. The most recent hydraulic report is titled "Hydraulic Study for El Camino Real Bridge Project on the San Dieguito River," prepared by Rick Engineering Company, originally dated April 2006 and revised on March 12, 2012 (Rick 2012). This separate technical report, along with the previous studies incorporated by reference, is incorporated into this EIR by reference, and is available for inspection at the City of San Diego. For ease of reference, the 2012 hydraulic report includes two of the previous reports (prepared by Chang Consultants in June 2005 and November 2005) as attachments. Other technical reports incorporated into this EIR by reference are the Drainage Study and Water Quality Technical Report (Storm Water Data Report) in support of the Site Development Permit (SDP) for the El Camino Real Road/Bridge Widening The reports are titled "Drainage Study Report for El Camino Real Road/Bridge project. Widening Project on the San Dieguito River (Site Development Permit)," dated August 17, 2012, and "Preliminary Storm Water Data Report for El Camino Real Road/Bridge Widening Project on the San Dieguito River," dated August 17, 2012.

As discussed in the City's CEQA Significance Determination Thresholds (City of San Diego 2011), hydrology is defined as the science dealing with the properties, distribution, and circulation of surface water, ground water and atmospheric water. The quantity of water that flows in a creek or river is calculated based on historic climactic conditions combined with the watershed characteristics. The slope and shape of the watershed, soil properties, recharge area, and relief features are watershed characteristics that influence the quantity of surface flows. As land is developed, impervious area is increased, thereby increasing runoff. The increased volume of water in a drainage may have short-lived, but rather dramatic, impacts during storm events. The potentially adverse impacts are property damage and disturbance of wildlife habitat.

This section addresses how the existing San Dieguito River drainage system and underlying groundwater could be affected by the project, in terms of water quantity and water quality. In addition, local drainage issues along Via de la Valle and El Camino Real are addressed.

Methodologies applied for addressing surface water quantity impacts focused on estimating flow volumes, water levels, and velocities of various flood events. These parameters reflect the susceptibility of existing and proposed facilities to inundation from flooding, and the upstream consequences of achieving 100-year flood protection for the bridge and El Camino Real. Because detailed studies of the San Dieguito River in the study area have not been formalized by the Federal Emergency Management Agency (FEMA), a series of hydraulic analyses were conducted to update flood boundaries and water surface elevations in the vicinity of the project. The results of these studies are provided within this section of the recirculated EIR, and are summarized in the hydraulic study (Rick 2012).

Groundwater quantity impacts were evaluated by reviewing the project geotechnical report and available references about groundwater in San Diego County.

The City's CEQA Significance Determination Thresholds (City of San Diego 2011) also require water quality issues to be addressed. Water quality is affected by sedimentation caused by erosion, by runoff carrying contaminants, and by direct discharge of pollutants. As land is developed, the new impervious surfaces send an increased volume of runoff containing oils, heavy metals, pesticides, fertilizers and other contaminants into adjacent watersheds. In this recirculated EIR, the potential for changes to erosion and sedimentation patterns in the San Dieguito River was evaluated in the earlier hydraulic studies prepared by Chang Consultants, which are now included by reference within the hydraulic study (Rick 2012). The potential for pollutants on paved surfaces created by the project to reach the San Dieguito River is also addressed in this EIR Section.

Groundwater quality impacts were evaluated by comparing existing beneficial uses to beneficial uses that would be likely after project completion. Specific water quality sampling was not conducted.

3.7.1 Regulatory Setting

A variety of laws, general policies, and regulations govern the water resources within the study area. This regulatory framework also provides the guidelines and management practices to avoid, minimize, or mitigate adverse impacts to these resources.

<u>Executive Order 11988 (Floodplain Management)</u>. This order directs federal agencies to avoid, to the extent possible, the long- and short-term adverse impacts associated with occupancy and modification of floodplains. All of the build alternatives follow this Order by implementing project features that would maintain upstream 100-year water surface elevations at or below the levels estimated for the 100-year flood that would occur under existing conditions. Relevant sections of the Executive Order are cited below.

By virtue of the authority vested in me by the Constitution and statutes of the United States of America, and as President of the United States of America, in furtherance of the National Environmental Policy Act of 1969, as amended (42 U.S.C. 4321 et seq.), the National Flood Insurance Act of 1968, as amended (42 U.S.C. 4001 et seq.), and the Flood Disaster Protection Act of 1973 (Public Law 93-234, 87 Stat. 975), in order to avoid to the extent possible the long and short term adverse impacts associated with the occupancy and modification of floodplains and to avoid direct or indirect support of floodplain development wherever there is a practicable alternative, it is hereby ordered as follows:

Section 1.

Each agency shall provide leadership and shall take action to reduce the risk of flood loss, to minimize the impact of floods on human safety, health and welfare, and to restore and preserve the natural and beneficial values served by floodplains in carrying out its responsibilities for (1) acquiring, managing, and disposing of Federal lands and facilities; (2) providing Federally undertaken, financed, or assisted construction and improvements; and (3) conducting Federal activities and programs affecting land use, including but not limited to water and related land resources planning, regulating, and licensing activities.

Section 2.

In carrying out the activities described in Section 1 of this Order, each agency has a responsibility to evaluate the potential effects of any actions it may take in a floodplain; to ensure that its planning programs and budget requests reflect consideration of flood

hazards and floodplain management; and to prescribe procedures to implement the policies and requirements of this Order, as follows:

(a)(1) Before taking an action, each agency shall determine whether the proposed action will occur in a floodplain \ldots

(2) If an agency has determined to, or proposes to, conduct, support, or allow an action to be located in a floodplain, the agency shall consider alternatives to avoid adverse effects and incompatible development in the floodplains. If the head of the agency finds that the only practicable alternative consistent with the law and with the policy set forth in this Order requires siting in a floodplain, the agency shall, prior to taking action, (i) design or modify its action in order to minimize potential harm to or within the floodplain, consistent with regulations issued in accord with Section 2(d) of this Order, and (ii) prepare and circulate a notice containing an explanation of why the action is proposed to be located in the floodplain.

Section 3

In addition to the requirements of Section 2, agencies with responsibilities for Federal real property and facilities shall take the following measures:

(a) The regulations and procedures established under Section 2(d) of this Order shall, at a minimum, require the construction of Federal structures and facilities to be in accordance with the standards and criteria and to be consistent with the intent of those promulgated under the National Flood Insurance Program. They shall deviate only to the extent that the standards of the Flood Insurance Program are demonstrably inappropriate for a given type of structure or facility.

(b) If, after compliance with the requirements of this Order, new construction of structures or facilities are to be located in a floodplain, accepted floodproofing and other flood protection measures shall be applied to new construction or rehabilitation. To achieve flood protection, agencies shall, wherever practicable, elevate structures above the base flood level rather than filling in land.

Section 6

(b) The term "base flood" shall mean that flood which has a one percent or greater chance of occurrence in any given year.

(c) The term "floodplain" shall mean the lowland and relatively flat areas adjoining inland and coastal waters including floodprone areas of offshore islands, including at a minimum, that area subject to a one percent or greater chance of flooding in any given year.

<u>Federal Clean Water Act of 1972 (33 U.S. C. 1251 et seq.)</u>. This is the basic federal law dealing with surface water quality control and protection of beneficial uses of water. Specifically, Section 402 of the Act establishes the NPDES permit system for the discharge of any pollutant (except dredge or fill material) into waters of the United States. To ensure compliance with Clean Water Act Section 402, the SWRCB has issued a NPDES Statewide Storm Water Permit. Construction regulations are addressed in the SWRCB NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities Order No. 2009-0009-DWQ NPDES No. CAS00002 (adopted September 2, 2009). The applicable local municipal permit that currently regulates post-construction storm water regulations for the proposed project

is the California RWQCB, San Diego Region, Order No. R9-2007-0001, NPDES No. CAS0108758 (*Waste Discharge Requirements for Discharges of Urban Runoff from the Municipal Separate Storm Sewer Systems (MS4s) Draining the Watersheds of the County of San Diego, the Incorporated Cities of San Diego County, the San Diego Unified Port District, and the San Diego County Regional Airport Authority*). In addition, the City Storm Water Standards, dated January 20, 2012, is a manual for construction and permanent storm water Best Management Practices (BMPs) requirements developed by the City to comply with the MS4s permit.

<u>Federal Soil Conservation Law (16 USGS 590a)</u>. By congressional policy, this law "provides permanently for the control and prevention of soil erosion by preventative measures, including, but not limited to, engineering operations, methods of cultivation, growing of vegetation, and changes in land use."

Code of Federal Regulations Title 44: Emergency Management and Assistance, Part 60: Criteria for Land Management and Use. This portion of the federal code addresses flood plain management criteria for flood-prone areas, and requires certain standards be met for different circumstances of flood hazard designation. In the case where areas of special flood hazard (A zones) have been designated but FEMA (Administrator) has neither produced water surface elevation data nor identified a floodway or coastal high hazard area, new development is to meet standards that include paragraph 44 CFR 60.3 (d)(3), as follows: "Prohibit encroachments, including fill, new construction, substantial improvements, and other development within the adopted regulatory floodway unless it has been demonstrated through hydrologic and hydraulic analyses performed in accordance with standard engineering practice that the proposed encroachment would not result in any increase in flood levels within the community during the occurrence of the base flood discharge."

<u>California Water Code</u>. Provisions in the California Water Code control many aspects of water and its use in the state. Division 5 of the Code pertains to flood control; Division 6 controls conservation, development and utilization of the state water resources; Division 7 covers water quality protection and management; and Divisions 11 through 21 provide for the organization, operation, and financing of municipal, county, and local water-oriented agencies.

<u>Porter-Cologne Water Quality Control Act of 1969 (Division 7 of the 1969 California Water Code)</u>. This act mandates that the waters of the State shall be protected such that activities that may affect waters of the State shall be regulated to attain the highest quality.

<u>Water Quality Management Policy (RWQCB)</u>. This policy, stated in the Water Quality Control Plan for the San Diego Basin (9) (RWQCB 1994), consists of the following five statements:

- Policy One: Water quality objectives, beneficial uses, and water quality control plans and policies adopted by the State Water Resources Control Board and the Regional Water Quality Control Board shall be an integral part of the basis for water quality management.
- Policy Two: Water shall be reclaimed and reused to the maximum extent feasible.
- Policy Three: Point sources and nonpoint sources of pollution shall be controlled to protect designated beneficial uses of water.
- Policy Four: Instream beneficial uses shall be maintained, and when practical, restored, and enhanced.

• Policy Five: A detailed and comprehensive knowledge of the beneficial uses, water quality and activities affecting water quality throughout the Region shall be maintained.

Order No. R9-2007-0001 (RWOCB). The waste discharge requirements in this order (see Federal Clean Water Act of 1972, above) addresses urban runoff discharges from MS4s for 21 municipal copermittees, including the City of San Diego and the County of San Diego. The existing permit was originally issued in 1990 and subsequently amended in 2001, and 2005. The Order notes that local storm water, grading, construction, and use permits, plans, and ordinances must (a) prohibit the discharge of pollutants and non-storm water into the MS4s; and (b) require the routine use of BMPs to reduce pollutants in site runoff. Each municipal copermittee is responsible for enforcing its local permits, plans, and ordinances within its jurisdiction. The San Diego RWQCB is responsible for enforcing both statewide general permits and Order No. R9-2007-0001 within the San Diego Region. The Order includes storm water management requirements, including source control BMPs, Low Impact Development (LID) BMPs, structural treatment BMPs and hydromodification management. As stated in the WQTR (SWDR) in support of SDP, storm water runoff from the project will be directed to the proposed storm water management BMPs for pollutant control prior to discharging into storm drain systems that discharge directly into the San Dieguito River. In regards to the hydromodification management requirement, the storm drain systems from the project discharge directly into the San Dieguito River and this portion of the San Dieguito River is exempt from Hydromodification Management requirements. As a result, the project is not required to incorporate to Hydromodification Management into the project design.

In addition, construction regulations to reduce pollutants from construction sites must be implemented by each copermittee, including components to address pollution prevention measures, grading ordinance updates, grading approval processing, source identification, BMP implementation, inspection, enforcement, reporting, and education.

<u>City of San Diego Planning Documents</u>. As discussed in Section 3.1, the various planning documents that establish development guidelines and policies for the study area include policies that address flood control, habitat protection, and maintenance of open space.

San Diego Municipal Code, Chapter 14: General Regulations, Section 143.0145: Development Regulations for Special Flood Hazard Areas, and Section 143.0146: Supplemental Regulations for Special Flood Hazard Areas. These sections of the City of San Diego code address requirements for flood protection and development within a floodplain area. Provisions relevant to the floodplain in the study area include the following:

• 143.0145 (e) (7): Floodways: "Within the Coastal Overlay Zone, no structure or portion thereof shall be erected, constructed, converted, established, altered or enlarged, or no landform alteration grading, placement or removal of vegetation, except that related to a historic and ongoing agricultural operation, or land division shall be permitted, provided:

(A) Parking lots, new roadways and roadway expansions shall be allowed only where indicated on an adopted Local Coastal Program land use plan.

(B) Floodway encroachments for utility and transportation crossings shall be offset by improvements or modifications to enable the passage of the base flood, in accordance with the FEMA standards and regulations provided in Section 143.0146."

• 143.0145 (f) (1): Flood Fringe: "Within the flood fringe of a Special Flood Hazard Area, permanent structures and fill for permanent structures, roads, and other development are allowed only if the following conditions are met:"

"(B) The development is capable of withstanding flooding and does not require or cause the construction of off-site flood protective works including artificial flood channels, revetments, and levees nor will it cause adverse impacts related to flooding of properties located upstream or downstream, nor will it increase or expand a (FIRM) Zone A."

- 143.0146 (a): Development and Permit Review: (2): "Proposed development in a Special Flood Hazard Area shall not adversely affect the flood carrying capacity of areas where base flood elevations have been determined but the floodway has not been designated. 'Adversely affect' as used in this section means that the cumulative effect of the proposed development, when combined with all other existing and anticipated development, will not increase the water surface elevation of the base flood more than one foot at any point."
- 143.0146 (a): Development and Permit Review: (7): "In all floodways, any encroachment, including fill, new construction, significant modifications, and other development is prohibited unless certification by a registered professional engineer is provided demonstrating that encroachments will not result in any increase in flood levels during the occurrence of the base flood discharge."

Concurrence of the project with these and other City of San Diego Municipal Code regulations is addressed in Section 3.1.3.5 of this recirculated EIR.

<u>City of San Diego Storm Water Standards Manual (dated January 20, 2012).</u> The City's current Storm Water Standards Manual provides information to project applicants on how to comply with the permanent and construction storm water quality requirements in the City. Significant elements of the Storm Water Standards Manual includes elements such as LID BMP Requirements, Source Control BMPs, and Treatment Control BMPs. LID BMPs would be significant to site planning because these features require an area on-site to help detain, retain, infiltrate, re-use, or promote evapotranspiration of storm water. The Storm Water Standards Manual also mentions "Hydromodification – Limitations on Increases of Runoff Discharge Rates and Durations." Hydromodification management requirements would dictate design elements in locations where downstream channels are susceptible to erosion from increases in storm water runoff discharge rates and durations. However, as indicated above, the project is exempt from hydromodification management requirements because the portion of the San Dieguito River reach the project discharges to is listed as one of the exempt river reaches identified in the City's Storm Water Standards Manual (see Table 4-2: Summary of Exempt River Reaches in San Diego County).

3.7.2 Affected Environment

3.7.2.1 San Dieguito River Watershed

River Basin. El Camino Real crosses the floodplain of the San Dieguito River, which has a watershed area that covers approximately 350 square miles. More than 80 percent of the total drainage area is controlled by dams (Chang 2005). The San Dieguito River basin extends about 44 miles eastward from the mouth of the San Dieguito Lagoon to Sutherland Reservoir. The San

Dieguito River itself extends from the coast to Lake Hodges, which was created in the 1920's by a dam across Del Dios Gorge. East of Lake Hodges the river is named Santa Ysabel Creek. The coastal watershed downstream of Lake Hodges encompasses approximately 42 square miles (USFWS 2000). El Camino Real bridge crosses the San Dieguito River at approximately river mile 2.61, as measured from the coast (USFWS 2000). In the Water Quality Control Plan for the San Diego Basin, the study area is within the Rancho Santa Fe Hydrologic Subarea of the Solana Beach Hydrologic Area of the San Dieguito Hydrologic Unit (905.11) (SDRWQCB 1995). La Zanja Canyon joins the San Dieguito River upstream of El Camino Real bridge, and Gonzales Canyon joins the river downstream of the bridge, south of the intersection of El Camino Real and San Dieguito Road.

The river valley falls under the jurisdiction of the City of Del Mar, as well as the City and County of San Diego. Large parcels in the valley are owned by the State of California 22nd District Agricultural Association. Characteristically a broad and flat floodplain, the area is developed with a wide range of land uses, including residential, commercial, rural estate, golf courses, agricultural, the Del Mar Fairgrounds, and specialized recreational facilities (Horsepark and Polo Club fields). The steep Del Dios Gorge area is generally undeveloped and likely to remain so due to severe topographic constraints (City of San Diego 1984).

According to the Park Master Plan for the Coastal Area of the San Dieguito River Valley Regional Open Space Park (JPA 2000), the San Dieguito River is one of several San Diego County rivers that rise in the mountainous mid-county and flow west to the ocean. Most of these streams have (or had) lagoons and tidal marshes near their mouths. A U.S. Coast and Geodetic Survey map drawn in 1889 appears to show that the San Dieguito Lagoon and its surrounding wetlands once covered not only their present location west of Interstate 5 (I-5) and south of the river channel, but also extended north to the vicinity of Via de la Valle and east toward El Camino Real. The historic survey depicts a braided river channel west of the current location of El Camino Real. Much of the surrounding valley floor was described as swamp and overflow lands and tidelands. The Park Master Plan notes that many major construction projects in the San Dieguito River Valley over the last century have degraded the lagoon ecosystem. These projects include two dams on the river (Sutherland and Hodges); a railroad, highway, and freeway, all of which cross the lagoon; and a shopping center and a racetrack-fairgrounds complex that have been built in the floodplain, as well as extensive agricultural operations east of I-5.

In the local drainage area adjacent to El Camino Real, there are no sole-source aquifers, wellhead protection areas, lakes, bays, National Wild and Scenic Rivers, or areas subject to the Coastal Barrier Resources Act. The San Dieguito River does not serve as a public water supply to any entity in the reach being studied. Lake Hodges has limited water supply uses which may increase in the future when the lake is connected via pipeline and pumping facilities to the new Olivenhain Reservoir.

As with many ephemeral rivers and streams in San Diego County, the San Dieguito River flows when sufficient rainfall occurs to exceed the soil's moisture absorbing capacity and travel downslope. Irrigation runoff from surrounding lands can also feed the river. In the local semiarid climate, rainfall is strongly seasonal, with a short wet season that typically extends from November through April, and with the remainder of the year relatively dry. Periods of extremely high annual rainfall greater than or approaching 25 inches occurred in 1883-84, and 1940-41 (USFWS 2000). Other years of relatively high annual rainfall occurred in 1921-22, 1951-52, 1977-78, and 1982-83 (USFWS 2000). In the area near El Camino Real bridge, the San Dieguito River flows from east to west. The earthen, vegetated river channel east of the bridge is approximately 300 feet wide, and was engineered in the 1980s as part of the approved Fairbanks Ranch Country Club Specific Plan. The natural channel west of the bridge varies from approximately 300 feet wide adjacent to the bridge to 200 feet and much narrower further downstream.

Local Surface Water. Flow in the drainage ditches parallel to the south edge of Via de la Valle and the east edge of El Camino Real arises from runoff from the surrounding drainage area that extends into the rural residential area north of Via de la Valle and encompasses approximately 1 square mile. The 100-year flow rate from the local area estimated with the NRCS hydrologic method is as follows:

• 100-year flow 680 cubic feet per second (cfs)

Runoff is directed from the north to the south under Via de la Valle in two existing 18-inch culverts and a headwall that was constructed in 1987 to direct low flows westerly along Via de la Valle. Runoff in the open drainage ditch on the south side of Via de la Valle eventually joins the drainage ditch that parallels El Camino Real and flows southward to the San Dieguito River. Runoff enters the open ditch parallel to El Camino Real via sheet flow. According to comments on the Notice of Preparation from the representative of the property owner at the time, drainage problems have occurred on the private property south of Via de la Valle and east of El Camino Real for years because in the late 1980s, drainage from a convalescent home across Via de la Valle at El Camino Real North was directed to the private property through pipes under Via de la Valle and a headwall on the south side of the road. The comment letter also notes concerns about the raised elevation of the proposed widened roadway increasing runoff and/or velocity of runoff onto the private property.

Inefficiencies in runoff in this area are apparent from the extent of wetland vegetation growing in the northwestern corner of Via de la Valle and El Camino Real North. The drainage ditch on the south side of Via de la Valle from El Camino Real North to the segment of El Camino Real proposed to be widened supports freshwater marsh, and typically has ponded water, indicating minimal longitudinal slope and inefficient flow. The termination of the drainage ditch parallel to El Camino Real at the San Dieguito River is undefined and topographically inefficient, which also inhibits effective local drainage. All build alternatives propose a triple 10-foot by 3.5-foot RCB culvert to replace the existing culverts under Via de la Valle. Once on the south side of Via de la Valle, runoff from large storm events would continue to flow overland in a southerly direction toward the San Dieguito River as under existing conditions. However, low flows (nuisance runoff) would be conveyed in a low-flow storm drain that would be constructed within widened Via de la Valle. This runoff would be directed from the upstream edge of the proposed culvert system to the existing ditch just east of existing El Camino Real. This design would maintain low flows to the existing ditch parallel to existing El Camino Real while still allowing large flows to be conveyed southerly toward the San Dieguito River. Although all of the build alternatives would eliminate the existing ditch parallel to the south edge of Via de la Valle, appropriate mitigation for wetland vegetation impacted would be provided. All of the alternatives except for the Central Alignment and Lower Elevation alternatives would minimize changes to the ditch parallel to El Camino Real in order to sustain existing conditions as much as possible. The Central Alignment and Lower Elevation alternatives would recreate the ditch parallel to El Camino Real along the east side of the widened road.

Groundwater. The Draft EIR/EIS for the San Dieguito Wetland Restoration Project (USFWS 2000) addressed groundwater in the area that includes El Camino Real. The EIR/EIS noted that there are few permeable geologic formations in the San Diego region that contain and can supply appreciable quantities of groundwater. Within the lower reaches of the San Dieguito

River Valley, which is typically 2,000 feet wide and locally up to 6,000 feet wide, the estimated thickness of the aquifer is less than 150 feet. Sediments forming the aquifer consist primarily of interbedded sands and silts, with occasional clay lenses. The EIR/EIS also noted that groundwater development in the lower reaches of the San Dieguito River Valley has been limited primarily to shallow alluvial aquifer wells adjacent to the river that are used for agricultural purposes. The nearest major producing well is on the north side of the valley, approximately 4,500 feet upstream from El Camino Real, and the main center of groundwater withdrawal is 1.25 miles upstream.

The reports prepared by Chang Consultants (Chang 2005) provide the following information regarding groundwater. The lower San Dieguito River has an alluvium layer under the riverbed. Groundwater in the alluvium is used for irrigation and also prevents salt-water intrusion. The river flow contributes to groundwater recharge that occurs when the ground surface is under water. During major floods, the floodwater spreads out to a broad floodplain and groundwater recharge occurs over a large land area. During smaller events, the flow stays in the main channel and groundwater recharge occurs only in the main channel. Durations of major floods are much shorter than low flows.

Sediment Transport. The reports prepared by Chang Consultants (Chang 2005) provide the following information regarding sediment transport. The major sediment source for the lower San Dieguito River has been cut off by the Lake Hodges Dam, and by sand mining at Rancho Santa Fe. The source of sediment for the river in the study area is limited to the lower river reach of about 4.5 miles. During high flow, the floodwater spreads out of the main channel to a broad floodplain. The existing bridge crossing is a small opening in a broad floodplain; it constricts the flow to cause a high velocity through the bridge opening. The channel bed at the bridge opening is subject to scour during high flow. The scour development is limited to the layer of bed material (sediment deposited on the river bed) above the existing riprap blanket in the river. Vegetation grows in the deposited sediment layer above the riprap blanket. The material removed by scour during high flow is usually refilled during low flow periods, when flows are contained in the main channel.

Water Quality and Beneficial Uses. The following beneficial uses are designated for the San Dieguito River (Hydrologic Unit Basin Number 5.11) in the Basin Plan (SDRWQCB 1994):

- Agricultural Supply (AGR) Potential. Includes uses of water for farming, horticulture, or ranching including, but not limited to, irrigation, stock watering, or support of vegetation for range grazing.
- Industrial Service Supply (IND) Potential. Includes uses of water for industrial activities that do not depend primarily on water quality including, but not limited to, mining, cooling water supply, hydraulic conveyance, gravel washing, fire protection, or oil well re-pressurization.
- Contact Water Recreation (REC-1) Includes uses of water for recreational activities involving body contact with water, where ingestion of water is reasonably possible. These uses include, but are not limited to, swimming, wading, water-skiing, skin and SCUBA diving, surfing, white water activities, fishing, or use of natural hot springs.
- Non-contact Water Recreation (REC-2) Includes the uses of water for recreational activities involving proximity to water, but not normally involving body contact with water, where ingestion of water is reasonably possible. These uses include, but are not

limited to, picnicking, sunbathing, hiking, beachcombing, camping, boating, tidepool and marine life study, hunting, sightseeing, or aesthetic enjoyment in conjunction with the above activities.

- Warm Freshwater Habitat (WARM) Includes uses of water that support warm water ecosystems including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, fish or wildlife, including invertebrates.
- Cold Freshwater Habitat (COLD) Includes uses of water that support cold water ecosystems including, but not limited to, preservation or enhancement of aquatic habitats, vegetation, fish or wildlife, including invertebrates.
- Wildlife Habitat (WILD) Includes uses of water that support terrestrial ecosystems including, but not limited to, preservation and enhancement of terrestrial habitats, vegetation, wildlife (e.g., mammals, birds, reptiles, amphibians, invertebrates), or wildlife water and food sources.
- Spawning, Reproduction, and/or Early Development (SPWN) Includes uses of water that support high quality aquatic habitats suitable for reproduction and early development of fish. This use is applicable only for the protection of anadromous fish.

The following existing beneficial uses for groundwater in the Solana Beach Hydrologic Area are identified in the Basin Plan (SDRWQCB 1994):

- Municipal and Domestic Supply (MUN) Includes uses of water for community, military, or individual water supply systems including, but not limited to, drinking water supply.
- Agricultural Supply (AGR) Defined above.
- Industrial Service Supply (IND) Defined above.

Of the above surface water beneficial uses in the hydrologic area, those occurring in the San Dieguito River in the vicinity of El Camino Real are non-contact recreation (hiking, sightseeing), and habitat support. Groundwater uses are occurring nearly 1.6 km (1 mi) upstream, but not in the immediate area. The Fairbanks Ranch Country Club Golf Course has historically used groundwater as part of their irrigation supply.

The San Dieguito River is listed in the 2010 Integrated Report (Clean Water Act Section 303(d) List/305(b) Report, State Water Resources Control Board 2010) as impaired for enterococcus, fecal coliform, nitrogen, phosphorous, total dissolved solids, and toxicity.

Existing Storm Drainage Infrastructure. The only storm drainage facilities that are apparent in the area are the open ditches parallel to the north and south edges of Via de la Valle east of El Camino Real, and the ditch parallel to El Camino Real from Via de la Valle to the San Dieguito River.

Section 404 Permit Issues. As discussed in Section 3.12: Biological Resources, the project involves potential impacts to wetland vegetation and Waters of the U.S. that would fall under the purview of the USACE, and require permitting under Section 404 of the Clean Water Act. These resources are primarily in the San Dieguito River and the open drainage ditch that parallels Via de

la Valle east of El Camino Real, and the ditch that parallels El Camino Real from Via de la Valle to the river. Permanent impacts would arise from direct impacts of the new piers, and elimination of the open drainage ditches due to road construction of several alternatives. The proposed project was initially presented to the USACE in an Interagency Meeting held on February 16, 1999, and has been discussed in subsequent agency coordination meetings and follow-up phone conversations to the present. Different alternatives may result in different 404 Permit requirements; however, the project has proceeded under the assumption that an Individual 404 Permit would be required. Nationwide 404 Permit 14 (Road Crossings) would be an appropriate Nationwide permit for the bridge impacts. An applicable Nationwide Permit does not exist for the impacts to wetlands in the drainage ditches, but several alternatives avoid impacting the drainage ditch parallel to El Camino Real, which would reduce wetland impacts. Permit requirements will be finalized when an alternative is selected for final design at the end of the environmental process.

3.7.2.2 Floodplain Characteristics

Definition of Existing 100-year Floodplain/Floodway and Floodplain Values. FEMA floodplain maps for the project area were based on a flood insurance update study conducted by Nolte and Associates in the mid 1980s. However, the floodplain analysis was never fully accepted, and FEMA classified the river with a Zone A designation, as shown in the FIRM in Figure 3.7-1. This means that detailed FEMA flood elevations have not been provided in the study area. In addition, a floodway has not been designated. A floodway boundary is estimated by performing hydraulic analysis where the 100-year floodplain is modeled iteratively as being squeezed by encroachments until the 100-year water surface elevations rise approximately 1 foot. The floodway then becomes the river corridor within which there can be no encroachment (e.g., fill or structures) in order to keep water surface elevations within the maximum of 1-foot rise. Substantial changes to the 100-year floodplain would require a formal FEMA map revision process, where detailed analysis would be provided to define 100-year water surface elevations, and the floodway. This process is called the CLOMAR, which must be approved by the local jurisdictional agency or agencies, and FEMA. A CLOMAR for the San Dieguito River floodplain downstream (west) of El Camino Real was submitted to FEMA for the Southern California Edison/JPA San Dieguito Lagoon Wetlands Restoration Project. However, this floodplain documentation and the hydraulic studies did not address the San Dieguito River upstream (east) of El Camino Real.

The boundaries of the 100-year floodplain shown on the FEMA FIRM Panel 1326 of 2375 (Figure 3.7-1) have been approximately mapped as roughly extending from Via de la Valle to San Dieguito Road east of El Camino Real. The area within this floodplain as mapped by FEMA is shown on an aerial photo in Figure 3.7-2. A portion of Via de la Valle is indicated as flooding during the 100-year event near El Camino Real North. The Horsepark 2000 Master Plan (Tucker Sadler Noble Castro Architects 2001) notes that in the 100-year flood, a portion of Horsepark area is flooded, El Camino Real is flooded, and Via de la Valle is not flooded. However, mapping of the 100-year floodplain as extending southward to San Dieguito Road east of El Camino Real is not consistent with the information in the 1981 Fairbanks Ranch Country Club EIR, as discussed below. The existing golf course and the expansion out to El Camino Real were approved with grading along the south bank of the river; however, openings in the bank of the river will still allow inundation of the golf course during a 100-year storm event.. This grading was accomplished in 2003.

Although much of the 100-year floodplain in the vicinity of El Camino Real is open, most of the land is developed or disturbed. On the west side of El Camino Real, the floodplain encompasses fallow agricultural fields and the Horsepark facility. On the east side of El Camino Real, the floodplain encompasses the Fairbanks Ranch Country Club golf course expanded in 2003 (although the golf course grading along the south bank of the river is intended to remove the golf course from the 100-year floodplain, per the 1981 EIR, openings in the bank of the river will still allow inundation to occur), the grass fields of Polo Club, and the undeveloped private property adjacent to Via de la Valle. The biological resources value of the floodplain area for sensitive plants or animals within the vicinity of the project site is discussed in detail in Section 3.12 of this recirculated EIR.

Historical Flooding and Flood Patterns. Because the San Dieguito River does not have substantial flood-carrying capacity, many flood events overflow the channel and spill out onto the valley floor. The San Dieguito Wetland Restoration Project Draft EIR/EIS (USFWS 2000) provided the following information about historical flooding in the study area:

"The El Nino-induced flooding in the early 1980s, on several occasions, flooded lowlying lands throughout the valley, including the residential area east of Camino Del Mar, just south of the river. Extensive flooding permeated much of the fairgrounds, including the parking both east and west of Jimmy Durante Boulevard, the alluvial floor of Crest Canyon to the south, the westerly, southerly, and easterly margins of the Via de la Valle shopping center just east of I-5, and a 2,000-foot width of low-lying lands extending from I-5 up to El Camino Real."

The EIR for the Fairbanks Ranch Country Club (American Pacific Environmental Consultants, Inc. 1981) provided the following information about historical flooding in the study area:

"In 1980, the river in the vicinity of the project, attained a very high flow velocity and damaged all the bridges between Interstate 5 and Via Santa Fe. The El Camino Real bridge bounding the subject property on the south was washed out. The north end of the bridge was undercut by the river when the slope protection failed. Part of the reason for the failure at El Camino Real is the present alignment of the river which flows diagonally toward the bridge rather than at a 90-degree angle. This present alignment increases the erosive action of the water. The bridge has since been restored."

Hydrologic Analysis. Because FEMA documentation is approximate, specific hydraulic studies were conducted for the study area (Chang 2005). The critical storm event that floodplain analysis focuses on is the 100-year storm, which is a storm event of such magnitude that there is a 1 percent chance it may occur in any given year. The 100-year event is the base flood referred to in regulatory guidelines as the federal and local goal for flood protection. Lesser floods are also addressed for comparison purposes, but the design standard is the 100-year flood.

The peak flows in the FEMA Flood Insurance Study for the San Dieguito River were used for the hydraulic studies conducted specifically for this project (Chang 2005). Table 3.7-1 presents flow rates applied in the hydraulic model.

Table 3.7-1Summary of Discharges for the San Dieguito River

10-year	50-year	100-year
5,900 cfs	32,500 cfs	42,800 cfs
C		

Source: Chang 2005

Hydraulic Analysis Methodology. Hydraulic analysis to develop velocities and water surface elevations in the river through the study area was prepared using the Hydrologic Engineering Center hydraulic model HEC-RAS (USACE 2001). This computer program routes a given flow rate through defined channel cross sections and calculates the resulting water surface elevations for open channel flow. HEC-RAS is an updated version of the well-known HEC-2 computer program. The effects of various obstructions such as bridges, culverts, and levees or berms in the floodplain can be considered in the computations. The hydraulic analyses were originally documented in the hydrologic study by Chang Consultants (Chang 2005), and have since been updated in the project hydraulic study (Rick 2012). Topographic mapping flown in 2004 was used to develop cross sections for the hydraulic modeling. The grading along the south bank of the river that was constructed in 2003 as part of the expansion of the Fairbanks Ranch Golf Course was incorporated into the hydraulic model for existing and proposed conditions via the current topography. Detailed computer print-outs are included for the existing and proposed condition (for the Eastern Alignment Alternative) in the hydraulic study (Rick 2012). Previous alternative analyses and backup information are presented in the hydrologic study by Chang Consultants (Chang 2005). The results are summarized in this recirculated EIR. The locations of the general cross sections modeled are shown in Figure 3.7-3. The specific cross sections at the Eastern Alignment Alternative bridge, which is in a different location from the existing bridge, are shown in the closer view in Figure 3.7-4.

The proposed project conditions are applicable to all build alternatives, which incorporate abutment slopes steepened to 1.5:1 from approximately 2:1. The proposed project conditions modeling also incorporates the proposed mitigation concept downstream (west) of the bridge, which includes a vegetated berm parallel to the river and set back from the southern river bank in existing fallow agricultural fields (see Section 3.12). The effects of this mitigation area on the floodplain (water surface elevations and velocities) are shown in the project hydraulic study (Rick 2012), and the detailed hydraulic design of the actual mitigation concept (i.e. – sizing of the inflow and outflow weir, and elevations of the weir) is provided in the reports by Chang Consultants (Chang 2005).

The proposed berm would protect marsh that would be planted in a lowered area south of the berm from sediment deposition during high flood events. Sediment would damage the marsh proposed to be planted in this area, decreasing the effectiveness of the created wetland area as clapper rail habitat. Without a berm, the river channel would be widened substantially beyond existing conditions, slowing velocities and allowing additional sediment deposition. The additional deposition of sediment in the protected marsh area would also decrease the volume of sediment that would be carried to the river outlet, which is undesirable from a beach sand supply standpoint. The protective berm concept is consistent with the thoroughly modeled and FEMA-accepted concept for the San Dieguito Lagoon Wetlands Restoration Project.

A notch ("weir") protected by visible riprap would be constructed in the berm to allow a portion of high river flows (above approximately the 20-year flood, when flow overtops the river channel) to be diverted into the lowered marsh area. The weir would be set at a high enough elevation to prevent heavy sediment (e.g., sand) from entering the protected marsh area. This diversion would prevent the berm in the floodplain from causing an increase in 100-year water surface elevations on the north side of the river and upstream of the bridge, and would provide periodic water supply to the mitigation area. The proposed project conditions modeled for the El Camino Real Bridge/Road Widening Project mitigation concept also involve new riparian planting in an area between the berm and the southern river bank. The HEC-RAS hydraulic analysis for the Eastern Alignment Alternative reflects these design concepts. The water surface elevations for all build alternatives would be similar to the levels shown, especially because the same mitigation concept would be implemented for any of the alternatives.

Results for 100-year Condition. Results of the existing and proposed project conditions modeled for the 100-year flood and the cross sections studied are presented in Table 3.7-2.

<u>100-year Water Surface Elevations</u>. At all cross sections, proposed 100-year water surface elevations would be the same or lower than existing. It can be concluded that the proposed bridge and road would cause no rise in 100-year water surface elevations with the roadway raised above the 100-year flood across the floodplain. This conclusion is valid with the minor encroachment of an elevated path adjacent to the north bridge abutment (proposed as part of the project for all build alternatives except the Lower Elevation Alternative).

<u>100-year Channel Velocities</u>. In general, when velocities exceed 6 feet per second (fps), erosion can occur, particularly in the middle of a channel where streambed material will be picked up by the flowing water and moved downstream, even if not much erosion occurs at the stream banks. When velocities are less than about 3 fps, deposition can occur. Velocities of the 100-year flood under existing conditions are estimated as ranging from 2.9 fps to 9.7 fps. Existing velocities are erosional from River Station 2.524, located approximately 475 feet west of the existing bridge, to River Station 2.675, located approximately 320 feet east of the existing bridge. Existing velocities upstream and downstream of these river stations are in a transitional zone between erosional and depositional.

Velocities of the 100-year flood with the proposed project implemented are predicted to remain in a moderate to erosional range from 2.9 fps to 10.7 fps. Velocities predicted by the hydraulic model in the proposed 100-year condition are the same as existing conditions from River Station 1.979 to 2.231 (the downstream end of the river reach modeled). Velocities predicted by the hydraulic model in the proposed 100-year condition are lower than existing conditions from River Station 2.341 to River Station 2.524 of the river reach modeled. This reduction is due to the lowering of the existing fallow agricultural fields in the southern channel overbank (area outside of the river channel) for mitigation, as well as the reduction in peak flow rate due to a portion of discharge exiting the channel through the proposed trapezoidal weir (located between River Station 2.524 and 2.590). However, proposed condition 100-year velocities are higher than existing 100-year velocities from River Station 2.59 (downstream of the existing bridge) through the proposed bridge structure, as well as through the upstream end of the river reach modeled. The velocity predicted with the project would be erosional while the velocity in existing conditions would be below the 6 fps threshold for erosional conditions at River Station 2.675. The velocity predicted with the project would be less than erosional from River Station 2.732 to 2.844. Based on this hydraulic modeling, the project would increase the potential for erosion in the river from River Station 2.59 to 2.675.

Bank protection was installed previously along the south bank of the river for the expanded golf course in 2003, extending eastward from approximately 600 feet upstream (east) of the existing bridge, as depicted in the photographs in Figure 3.7-5. Therefore, only the north bank of the river would be vulnerable to erosion.

Cross Section #	Existing Water	Proposed Project	Existing Channel	Proposed Project		
	Surface	Water Surface	Velocity	Channel Velocity		
	Elevation	Elevation				
			Feet per second	Feet per second		
	Feet above msl	Feet above msl	(fps)	(fps)		
2.844	22.6	22.4	3.6	3.8		
2.782	22.5	22.3	3.5	3.7		
2.732	22.3	21.8	4.5	5.8		
2.675	21.9	20.8	5.7	8.4		
2.649	21.2*	20.2	7.3*	9.2		
2.637	20.9*	20.1*	8.0*	9.6*		
Eastern Alignment						
Bridge						
2.625	20.7*	20.0	8.8*	10.0		
2.623	20.6	19.8*	8.9	10.3*		
2.614	20.2	19.6	9.2	10.6		
2.6115	20.1*	19.5*	9.4*	10.6*		
Existing Bridge						
2.609	19.9	19.4	9.6	10.7		
2.59	19.8	19.5	8.8	9.0		
2.524	19.6	19.7	6.5	4.5		
2.439	19.5	19.4	4.7	4.4		
2.341	19.3	19.3	4.4	4.0		
2.231	19.2	19.2	3.2	3.2		
2.155	19.1	19.1	2.9	2.9		
2.06	19.1	19.1	3.3	3.3		
1.979	19.0	19.0	2.9	2.9		

 Table 3.7-2

 Hydraulic Conditions Modeling Results for 100-year Flood

Source: Rick 2012

*Value interpolated between river stations

Note: Modeling includes the mitigation concept

Results for 10-year Condition. Results of the existing and proposed project conditions modeling for the 10-year flood the cross sections studied are presented in Table 3.7-3. The proposed project conditions are applicable to all build alternatives, which incorporate abutment slopes steepened to 1.5:1 from approximately 2:1, and the proposed mitigation concept west of the bridge.

<u>10-year Water Surface Elevations</u>. At all cross sections, proposed 10-year water surface elevations would be the same or lower than existing. It can be concluded that the proposed bridge and road would cause no rise in 10-year water surface elevations with the roadway raised on embankment above the 100-year flood across the floodplain. This conclusion is valid with the minor encroachment of an elevated path adjacent to the north bridge abutment (proposed for all build alternatives except the Lower Elevation Alternative), as well as the mitigation areas proposed along the south overbank, immediately downstream of the existing bridge crossing.

<u>10-year Channel Velocities</u>. Velocities of the 10-year flood under existing conditions are estimated as ranging from 2.1 fps to 3.8 fps. Existing velocities are slightly depositional at River Stations 2.155 to 2.231, 2.439 to 2.524, and 2.675 to 2.844. Existing velocities at other river stations are in a transitional zone between erosional and depositional.

Velocities of the 10-year flood with the proposed project implemented are predicted to remain similar to existing conditions, in the range of 2.1 fps to 3.7 fps. Overall, velocities predicted by the hydraulic model in the proposed 10-year condition are generally the same as existing conditions downstream of River Station 2.231, lower than existing velocities from River Station 2.341 to 2.59, and slightly higher upstream of River Station 2.609. In the 10-year flood, velocities would be slightly depositional in the same portions of the river as described above for existing conditions.

Cross Section #	Existing Water Surface Elevation	Proposed Project Water Surface Elevation	Existing Channel Velocity	Proposed Project Channel Velocity
	Feet above msl		Feet per second	Feet per second
		Feet above msl	(fps)	(fps)
2.844	13.8	13.5	2.7	2.9
2.782	13.7	13.3	2.1	2.2
2.732	13.5	13.1	2.6	2.7
2.675	13.3	12.8	2.9	3.3
2.649	13.2*	12.7	3.0*	2.8
2.637	13.1*	12.7*	3.0*	3.0*
Eastern Alignment				
Bridge				
2.625	13.0*	12.6	3.0*	3.1
2.623	13.0	12.5*	3.0	3.3*
2.614	13.0	12.5	3.0	3.5
2.6115	13.0*	12.5*	3.0*	3.6*
Existing Bridge				
2.609	13.0	12.5	3.0	3.6
2.59	12.8	12.4	3.5	3.3
2.524	12.5	12.3	2.8	2.1
2.439	12.2	12.0	2.8	2.6
2.341	11.8	11.7	3.8	2.7
2.231	11.5	11.5	2.2	2.2
2.155	11.2	11.2	2.6	2.6
2.06	10.8	10.8	3.6	3.6
1.979	10.5	10.5	3.7	3.7

 Table 3.7-3

 Hydraulic Conditions Modeling Results for 10-year Flood

Source: Rick 2012

*Value interpolated between river stations

Comparison to Other Studies. The 100-year modeling results of the project hydraulic study (Rick 2012) are generally within 1 foot of other studies in the vicinity of El Camino Real bridge, including a flood insurance study performed by Nolte and Associates in the mid 1980s, and County of San Diego Floodplain maps. The hydraulics analysis presented in the Draft EIR/EIS for the San Dieguito Wetland Restoration Project (USFWS 2000) indicated that existing and proposed 100-year velocities ranged from approximately 6.5 fps at the I-5 bridge to 3.3 fps at the western edge of Horsepark. These velocities are within the range of 100-year velocities shown in Table 3.7-2 for the proposed project.

The Fairbanks Ranch Country Club EIR (American Pacific Environmental Consultants, Inc. 1981) analyzed a river channelization plan that would route 100-year flow in an engineered, 300-

foot wide revegetated channel, with a south bank set above the 100-year flood elevation to protect the golf course from flooding. The EIR concluded "that the flow characteristics of the proposed channel would be essentially identical to the existing channel." At the bridge, the computed 100year water surface elevation in existing and proposed conditions was 19.1 feet above mean sea level, and the channel velocity was 8.2 fps. These calculations were based on a 100-year flow rate of 46,000 cfs at El Camino Real bridge, which is higher than the flow rate applied in the later floodplain analysis and project hydraulic study. The Fairbanks Ranch Country Club EIR further noted that, "With the 100 year flow velocities essentially unchanged, the proposed channel would not increase the erosion of the river course. The proposed channel may actually reduce the amount of erosion which occurs in the present channel during periods of lesser flows."

The estimated existing condition 100-year water surface elevation of 20.2 feet at the upstream end of the existing El Camino Real bridge for the current study is approximately 1.1 foot higher than in the 1981 EIR for Fairbanks Ranch Country Club, and the currently estimated existing condition 100-year channel velocity of 9.2 fps is 1.0 fps higher. With the proposed project, the estimated 100-year flood level of 19.6 feet and velocity of 10.6 fps are close to the Fairbanks Ranch Country Club EIR results (at the upstream end of the existing bridge). The details of the 1981 hydraulic analysis for the country club are unavailable, so assumptions regarding topography, n values, amount of scour, and other parameters that affect the results are unknown. However, all of the results are in a comparable range, in spite of slightly different flow rates being applied.

Conditions During Construction. Construction of a new bridge would require placement of a temporary working platform in the San Dieguito River channel that would remain in place throughout the duration of construction, but removed at the end of construction. The working platform could consist of a berm or trestle, as discussed in Appendix D. In order to provide required access and protection for construction equipment, the berm or trestle would need to be elevated such that the top is above daily flows within the river, but low enough that it limits potential increases in water surface elevations for larger storm events (i.e., a 100-year storm event). A construction phase hydraulic study titled, "Hydrologic and Hydraulic Report for El Camino Real Road/Bridge Widening Project on the San Dieguito River (Construction Phase)," dated May 13, 2013 (Rick 2013), has been prepared to provide a detailed assessment of the hydraulic impacts of proposed temporary construction options anticipated for the proposed project. Assessments have been made regarding the hydraulic impacts during various return frequency storm events, as well as during daily flows. Temporary berm and temporary trestle options were modeled, and effects on water surface elevations and velocities were evaluated. To analyze the worst case obstruction of flow in the river during construction, the hydraulic models for the proposed condition include the piers from the existing and the proposed bridge (i.e., constructing the proposed bridge while the existing bridge remains in place). Characteristics of the berm and trestle options are summarized in Appendix D and discussed in more detail in the construction phase hydraulic study contained within Volume III of the EIR (Rick 2013).

Five different options for the temporary construction berm were analyzed, as follows:

- Option 1: 6-foot fill berm with two (2) 3-foot-deep trapezoidal berm openings with 3:1 side slopes, and three (3) 24-inch culverts (plastic or RCP) with a 3 foot total height trestle section across the berm openings span.
- Option 2: 8-foot fill berm with two (2) 5-foot-deep trapezoidal berm openings with 3:1 side slopes and three (3) 48-inch culverts with a 3 foot total height trestle section across the berm openings span.

- Option 3: 5-foot fill berm with three (3) 2-foot-deep trapezoidal berm openings with 3:1 side slopes with a 3 foot total height trestle section across the berm openings span.
- Option 4: 6-foot fill berm with three (3) 3-foot-deep trapezoidal berm openings with 3:1 side slopes with a 3 foot total height trestle section across the berm openings span.
- Option 5: 8-foot fill berm with three (3) 5-foot-deep trapezoidal berm openings with 3:1 side slopes with a 3 foot total height trestle section across the berm openings span.

The top of each berm opening was assumed to be 40 feet wide with a total open area of 68 square feet, 93 square feet, and 125 square feet for the 2-foot, 3-foot and 5-foot berm, respectively. At least one of the openings would be located over the existing low flow channel within the San Dieguito River.

The results from the hydraulic analyses for Berm Options 1, 2, and 3 indicated that the proposed low flow trapezoidal channels with the temporary culverts were not sufficient to convey even the 1.0-year storm event; therefore, these options were not considered further in the hydraulic analysis.

Two options for the temporary construction trestle were analyzed, as follows:

- Option 1: The trestle bottom elevation would be 3 feet above lowest elevation within the channel cross section.
- Option 2: The trestle bottom elevation would be 5 feet above lowest elevation within the channel cross section.

For each trestle option, a trestle was assumed to be set on the top of the piles and connected to them. The total height of the trestle construction was assumed to be 2 feet.

Hydraulic models were prepared for the existing and temporary construction option condition, analyzing 100-, 50-, 10-year storm events utilizing FEMA flow rates of 42,800, 32,500 and 5,900 cfs, respectively, and 2-, 1.3-, and 1.0-year storm events utilizing flow rates from the hydrologic study performed and presented in the construction phase hydraulic study (Rick 2013) with flow rates of 3,450, 1,624 and 426 cfs, respectively. Also, another consideration for the temporary construction options is comparing their capacity to convey the daily low-flows in the San Dieguito River; therefore, the average daily flow-rates were also identified. Results for the 10-year and 100-year flood conditions are summarized in Table 3.7-4. Detailed results for other storm events are provided in the construction phase hydraulic study (Rick 2013).

	Berm Option 4 10-yr / 100-yr	Berm Option 5 10-yr / 100-yr	Trestle Option 1 10-yr / 100-yr	Trestle Option 2 10-yr / 100-yr
Existing Water Surface Elevation (ft)	13.3 / 21.9	13.3 / 21.9	13.3 / 21.9	13.3 / 21.9
Existing Velocity (fps)	2.9/ 5.7	2.9/ 5.7	2.9/ 5.7	2.9/ 5.7
Construction Water Surface Elevation (ft)	14.7 / 23.3	16.2 / 24.7	13.4 / 22.2	13.6 / 22.7
Construction Velocity (fps)	2.9 / 8.7	2.9 / 8.7	2.7 / 8.3	2.6 / 8.1
Water Surface Elevation Increase at Bridge (ft)	1.4/ / 1.4	2.9 / 2.8	0.1 / 0.3	0.3 / 0.8
Maximum Water Surface Elevation Increase through All Cross Sections (ft)	1.8 / 2.7	3.4 / 4.1	0.3 / 1.5	0.6 / 1.9

 Table 3.7-4

 Construction Phase Hydraulic Modeling Results for 10-year and 100-year Floods

3.7.3 Impacts

Issues to be addressed are the following:

Issue 1: How would the proposed project affect the hydrology of the San Dieguito River? What features have been incorporated to protect the project components and surrounding land uses from inundation during a 100-year flood? What drainage facilities are proposed to control runoff?

Issue 2: To what extent would the construction and ultimate development of the project affect the water quality of the San Dieguito River and lagoon, as well as the groundwater supply?

3.7.3.1 Issue 1a: Impacts on Hydrology and Hydraulics of the San Dieguito River

All build alternatives would achieve 100-year flood protection for the bridge and segment of El Camino Real from Via de la Valle to San Dieguito Road through raising the roadway on embankment.

Hydrology. The study of hydrology relates to the flow rate and volume of runoff generated during various frequency storms (e.g., a 100-year storm). The proposed project would not increase the 100-year peak flow rate or volume in the San Dieguito River, because the new paved area of the road and bridge is located far downstream in the watershed, and the peak runoff results from flow that originates just downstream of Lake Hodges (and farther upstream if the dam is spilling). Therefore, none of the build alternatives would affect the hydrology of the San Dieguito River. Local runoff is discussed in Section 3.7.3.2.

Hydraulics. The study of hydraulics relates to the flow patterns, velocities, water surface elevations, and other characteristics that result when a certain flow rate is routed through a corridor, such as a river. Raising the segment of El Camino Real between Via de la Valle and San Dieguito Road on fill in order to provide 100-year flood protection for El Camino Real would change the existing hydraulics of the river and adjacent floodplain. Without an offsetting increase in river capacity, 100-year water surface elevations upstream (east) of El Camino Real could increase because the fill across the floodplain, particularly north of the bridge, would block

floodwater that has historically crossed the road from Polo Club fields to Horsepark, and then flow into the San Dieguito River. The blockage of flow would cause water to "back up" on the properties upstream (east) of El Camino Real. Federal and local regulations highlighted above in Section 3.7.1 note that increases in 100-year water surface elevations in an established floodway would be unacceptable. The study area upstream of the bridge is not in an established floodway. Regardless, the proposed steepening of the abutments under the bridge from 2:1 to 1.5:1 would provide the additional capacity needed to offset the potential increase in water surface elevation upstream. The existing condition 100-year water surface elevations estimated with year 2004 topography would be maintained or lowered (as shown in Table 3.7-2).

The proposed abutment steepening would not provide 100-year flood capacity in the San Dieguito River in this location. It would only offset the potential increase in 100-year water surface elevations to create a condition of "no rise" in 100-year water surface elevations with the road raised on fill across the floodplain. Properties that are currently flooded in a 100-year event would still be flooded to essentially the same extent as under existing conditions. However, properties west of El Camino Real that are currently flooded by overflow from the east would be protected from such overflow by the road embankment. This project benefit would mainly be experienced by the Horsepark property, although this property would still be subject to flooding from the river itself west of the bridge.

As noted above, velocities predicted by the hydraulic model in the proposed 100-year condition are the same as existing conditions, or lower, from (the location of the proposed trapezoidal weir for the proposed mitigation concept) just downstream of the existing bridge (west) to the downstream end of the river reach modeled. However, proposed condition 100-year velocities are higher than existing 100-year velocities from the downstream end of the existing bridge to the upstream end of the river reach modeled. Velocities change from being below the erosional threshold of 6 fps in existing conditions to being above this threshold in project conditions at River Stations 2.675 and 2.732, located approximately 320 feet upstream (east) of the existing bridge to approximately 620 feet upstream of the existing bridge. At other river locations where proposed condition velocities are erosional, the 100-year velocities are also erosional in the existing condition, although existing velocities are estimated to be lower than velocities with the project.

Velocities predicted by the hydraulic model in the proposed 10-year condition are generally the same as existing conditions downstream of River Station 2.231, lower than existing velocities from River Station 2.341 to 2.59 and slightly higher upstream of River Station 2.609. In the 10-year flood, velocities would be slightly depositional for most of this reach of the river for both existing and proposed conditions. The minor reductions and increases to the velocities are not expected to adversely affect river hydraulics.

Future Maintenance. Once the bridge is completed, no matter which alternative is selected, no long-term maintenance in the San Dieguito River channel is anticipated. Five-year mitigation monitoring would be conducted for the construction easement areas of the river that would be replanted with wetland vegetation in accordance with the approved mitigation program for impacts to biological resources (see Section 3.12).

Summary of Impact Severity. All of the build alternatives would affect river hydraulics in the same way. Water levels would not increase with the proposed project. Water velocities in the 10-year flood would decrease slightly in the reach upstream of the bridge. This is not expected to cause adverse changes in the river.

Water velocities in the 100-year flood would become erosional upstream of the existing bridge. Measures that will be incorporated into project design plans and specifications to reduce potential impacts from increased 100-year velocities are presented in Section 3.7.5. These measures include installing buried bank protection along the north bank of the river, which is currently unprotected. The south bank of the river has been protected from erosion by similar buried bank protection, which was installed in 2003 when the golf course was expanded westward to El Camino Real.

Construction Phase Hydraulic Conditions. All of the build alternatives would affect river hydraulics in the same way during construction. In a 100-year storm occurring during the construction period, water surface elevations upstream of the construction site would increase more than 1 foot, and velocities would be increased above the erosional threshold of 6 fps. The degree to which water surface elevations and velocities would be increased by temporary placement of a working platform in the river channel would vary depending on whether a berm or trestle would be installed. Impacts of each option are summarized below. For all options, once construction of the proposed bridge is complete, the temporary berm/trestle would be removed by the contractor, and the water surface elevations and velocities in the San Dieguito River would return to predicted levels discussed for proposed project conditions.

Berm Option 4 would convey a 1-inch (1.15-year) storm event. Due to the obstruction of the berm deck, anticipated fill in the river and decreasing the conveyance of the river in the area of disturbance, the water surface elevation would increase for all storm events except for the 1.0-year storm event. However, given the sediment transport characteristics of the river, the berm could be constructed with acceptable riverbed sand to allow washout during larger storm events, which would lessen the increase to water surface elevations during construction. There would be an increase in flow velocities for the 1.0-, 50-, and 100-year storm events. However, all storm events equal to or less than the 10-year have velocities that are less than 3 fps, and so are primarily still non-erosive. The flow velocities of the 50- and 100-year storms would be increased to above the erosional threshold of 6 fps.

Berm Option 5 would convey up to a 1.5-inch (1.3-year) storm event. The water surface elevation would increase for all storm events except for the 1.0- and 1.3-year storm events. Similar to Berm Option 4, there would be an increase in flow velocities for the 1.0-, 1.3-, 50-, and 100-year storm events. However, all storm events equal to or less than the 10-year would have velocities that are primarily still non-erosive, although the increase would be larger than for Berm Option 4. The flow velocities of the 50- and 100-year storms would be increased to above the erosional threshold of 6 fps.

Trestle Option 1 would convey up to a 1.5-inch (1.3-year) storm event. Due to the obstruction of the trestle construction and the decrease of the conveyance from the piles that support the trestle deck, the water surface elevation would increase for the 2-, 10-, 50-, and 100-year storm events. There would be an increase in flow velocities for the 50- and 100-year storm events. However, all storm events equal to or less than the 10-year have velocities that are less than 3 fps, and so are primarily still non-erosive. The flow velocities of the 50- and 100-year storms would be increased to above the erosional threshold of 6 fps.

Trestle Option 2 would convey up to a 2-inch (2-year) storm event. The water surface elevation would increase for the 10-, 50-, and 100-year storm events. There would be an increase in flow velocities for the 50- and 100-year storm events. However, all storm events equal to or less than the 10-year have velocities that are less than 3 fps, and so are primarily still non-erosive. The

flow velocities of the 50- and 100-year storms would be increased to above the erosional threshold of 6 fps.

Because the risk of 100-year water surface elevations being increased more than 1 foot is limited to the 18 months of construction time, there is not a permanent adverse change to the river. In addition, adverse impacts of erosional velocities upstream of the bridge would be prevented by installing buried bank protection along the north bank of the river as proposed for the project.

3.7.3.2 Issue 1b: Impacts on Local Drainage

Central Alignment, Western Alignment, and Lower Elevation Alternatives. The existing road is 23 feet wide. The additional paved area created with the full road cross section was estimated in the 2006 Draft EIR as 78 feet of new road width plus 11 feet total pedestrian walkway width (5.5 feet on each side), plus 10 feet of cobble strip to represent the discontinuous cobble placed among the trees and shrubs in the parkway (5 feet on either side), minus 23 feet existing width, for a total net increase in paved width of 76 feet. The project alternatives that involved a full, 122-foot-wide road cross section were estimated to create an additional 4.6 acres of paved area, estimated as 76 feet additional paved roadway and parkway width times 2,640 feet length. Using a rough estimate of 1 cfs per acre, the new paved area was estimated to generate approximately 4.6 cfs of additional runoff in the 100-year event. In addition, all alternatives would include widening Via de la Valle from the north curb southward to provide additional lanes and bike lanes. The widened road was 78 feet in width in the 2006 Draft EIR, and there would be a 22-foot-wide parkway along the south side of the road within which would be an anticipated 5.5-foot-wide pedestrian walkway and a 5-foot-wide cobble strip. Via de la Valle is approximately 32 feet wide currently, so the additional paved width would be 88.5 minus 32, or 56.5 feet. The additional paved acreage would be 56.5 feet times 1,000 feet of length, or 1.3 acres. This was estimated to create an additional 1.3 cfs of flow in the 100-year event. The total additional runoff from the proposed project was estimated in the 2006 Draft EIR to be This estimate of additional flow is less than 1.0 percent of the approximately 6 cfs. approximately 680 cfs local runoff estimated during a 100-year storm event. Therefore, the additional runoff generated by these alternatives would be negligible. The local runoff would be even less with the revised road cross sections for this recirculated EIR, which have pavement widths of 60 feet instead of 78 feet for the full cross section of El Camino Real and 70 feet instead of 78 feet for Via de la Valle.

The Central Alignment, Western Alignment, and Lower Elevation alternatives, as well as the other build alternatives, would eliminate the existing drainage ditch parallel to the south edge of Via de la Valle because of widening Via de la Valle from its intersection with El Camino Real to the intersection with El Camino Real North. A new low-flow buried storm drain would maintain conveyance for nuisance flows to the ditch parallel to El Camino Real. The storm drain would also serve to collect on-site drainage from widened Via de la Valle. Flow from large storm events would be conveyed more effectively under Via de la Valle in a larger RCB culvert undercrossing at El Camino Real North, and runoff would continue to flow across the floodplain south of the RCB culvert toward the San Dieguito River as under existing conditions.

The Central and Lower Elevation alternatives, but not the Western Alignment Alternative, would eliminate the existing drainage ditch along the east edge of El Camino Real. Because these drainage ditches contain wetland vegetation, mitigation would be required for biological resources purposes. For the drainage ditch parallel to El Camino Real, a comparable open drainage ditch revegetated appropriately would be created east of the widened roadway. The Western Alignment Alternative would not affect the ditch parallel to El Camino Real, and so there would be no need to restore it.

All runoff from the road would be routed to the eastern side where flow would be directed to the existing or restored drainage ditch, as occurs under existing conditions. Runoff generated by the widened road would not be allowed to flow onto private properties in the vicinity for any of the build alternatives.

It is anticipated that these alternatives would have a net benefit on local drainage facilities by replacing the existing culvert under Via de la Valle with a triple box culvert that will convey the 100-year flow from the upstream watershed. For the Western Alignment Alternative, low-flows will be maintained to the existing ditch and local roadway drainage will also be conveyed through the ditch, while the Central Alignment and Lower Elevation alternatives reconstruct this ditch for conveyance of the same flows as the Western Alignment Alternative. For each of these alternatives, the conveyance of low flows within a storm drain in Via de la Valle towards the ditch along El Camino Real will reduce nuisance flows entering the existing property south of Via de la Valle. For the Western Alignment Alternative that preserves the El Camino Real drainage ditch, the existing ditch does not have positive drainage, which results in intermittent ponding; however, this would be left as-is to minimize impacts and preserve existing conditions, whereas the reconstructed ditch for the other two alternatives would provide positive grade for drainage. Larger flows from the northerly watershed will continue to flow south across the property south of Via de la Valle and across the Polo Fields under all of these alternatives, similar to existing conditions. These areas are also within the 100-year floodplain from the San Dieguito River, with or without the project.

Road Capacity and Bicycle Safety Alternatives. These two alternatives would create less new paved area because the cross section would only be 60 feet wide. The additional paved area would be approximately 2.2 acres, estimated as 37 feet additional width times 2,640 feet length. The estimated additional 100-year flow from widening El Camino Real would be 2.2 cfs, plus the additional 1.3 cfs from widening Via de la Valle, for a total of 3.5 cfs, or 0.5 percent of the existing 100-year flow of approximately 680 cfs from the upstream drainage basin. This increase is negligible. These alternatives would preserve the existing drainage ditch parallel to El Camino Real, but would generate the effects to the ditch parallel to Via de la Valle discussed above.

It is anticipated that these alternatives also would have a net benefit on local drainage facilities by routing local flows parallel to Via de la Valle more effectively, as discussed above for the Western Alignment Alternative. However, the local drainage modifications would not change the 100-year flood conditions created by the San Dieguito River. The properties currently in the 100-year floodplain would remain in the floodplain, with or without the road/bridge widening project.

Eastern Alignment Alternative. This alternative was estimated in the 2006 Draft EIR to create an additional 99 feet of paved width with the same components of paved area as the other full road cross section alternatives, but without the subtraction of the 23 feet of existing roadway, since most of the existing road would remain as a frontage access for Mary's Tack and Feed. The additional acreage would be approximately 6 acres, and the additional 100-year flow would be 6 cfs. Combined with the 1.3 cfs of additional runoff from Via de la Valle, the total additional flow in the 100-year event was estimated to be 7.3 cfs. This is 1.0 percent of the existing 100-year flow of 680 cfs estimated from upstream, which is a negligible increase. With the reduced cross section width proposed in this recirculated EIR, the local runoff would be even less.

As for the other build alternatives, the Eastern Alignment Alternative would involve elimination of the existing drainage ditch along the south edge of Via de la Valle. However, a new low-flow buried storm drain would maintain conveyance of low flows to the existing drainage ditch parallel to El Camino Real, as discussed above. The storm drain in Via de la Valle would also serve to collect on-site drainage from widened Via de la Valle. An additional low-flow culvert would be installed under the proposed El Camino Real roadway just south of its connection to Via de la Valle to allow local drainage from the adjacent property to the east to drain under the new roadway toward the existing ditch that would remain between existing El Camino Real and proposed El Camino Real for the Eastern Alignment Alternative. Runoff from new El Camino Real would be routed westward to the existing ditch parallel to existing El Camino Real. A small drainage swale, roughly 2 feet wide at the bottom, 1 foot deep, with 2:1 side slopes, would be constructed along the eastern toe of the new El Camino Real embankment slope to carry nuisance flow to the San Dieguito River. Runoff generated by the widened road would not be allowed to flow onto private properties in the vicinity.

Similar to other alternatives, the Eastern Alignment Alternative would have a net benefit on local drainage facilities by replacing the existing culvert under Via de la Valle with a triple box culvert that will convey the 100-year flow from the upstream watershed. Like most other alternatives, low-flows will be maintained to the existing ditch and local roadway drainage will also be conveyed through the ditch. The conveyance of low flows within a storm drain in Via de la Valle towards the existing ditch along El Camino Real will reduce nuisance flows entering the existing property south of Via de la Valle. Larger flows from the northerly watershed will continue to flow south across the property south of Via de la Valle and across the Polo Fields, as it does for each alternative, similar to existing conditions. However, as noted for the other build alternatives, the local drainage modifications would not change the 100-year flood conditions between Via de la Valle and San Dieguito River that are created by the San Dieguito River and the 1-square-mile watershed tributary to the culvert crossing. The properties currently in the 100-year floodplain would remain in the floodplain, with or without the road/bridge widening project.

Roundabout Alternative. The new paved area of the Roundabout Alternative would be similar to the Eastern Alignment along El Camino Real, but greater along Via de la Valle due to the need to shift the new roadway south and extend the paying 500 feet eastward of El Camino Real North to transition onto existing Via de la Valle. For a conservative calculation comparable to the above estimates of local runoff, it was assumed that the previously applied 88.5 feet of widened Via de la Valle would be new paving for 1,500 feet, creating 3 acres of additional paving and 3.0 cfs of additional 100-year flow. Added to the 6.0 cfs of additional 100-year flow from El Camino Real, the total additional flow in the 100-year event is estimated to be 9.0 cfs. This is 1.3 percent of the existing 100-year flow of 680 cfs estimated from upstream, which is a negligible increase. With the reduced cross section width proposed for El Camino Real and Via de la Valle in this recirculated EIR, the local runoff would be even less. As noted for the other build alternatives, the local drainage modifications would not change the 100-year flood conditions between Via de la Valle and the San Dieguito River that are created by the San Dieguito River and the 1-square-mile watershed upstream of the culvert undercrossing at El Camino Real North. The properties currently in the 100-year floodplain would remain in the floodplain, with or without the road/bridge widening project.

3.7.3.3 Issue 2a: Impacts of Construction on Water Quality in San Dieguito River and Lagoon

All Alternatives. Construction activities associated with the proposed project may result in temporary increases in sedimentation and adverse changes in water quality in the San Dieguito River. These activities include dewatering, grading, excavation, stockpiling, filling, utility trenching and placement, and road and bridge construction.

Dewatering requires the removal of groundwater to create a dry working surface. Given the relatively high groundwater table in the study area, it is likely that some dewatering will be needed for various components of the build alternatives, although construction of the retaining walls for the Road Capacity Alternative and the Bicycle Safety Alternative may require more dewatering than the other alternatives, which would raise the road on fill with embankment slopes. The quantity and quality of groundwater removed and discharged would be determined during final design of the selected alternative. If groundwater is not discharged to a nearby sewer, this activity would be regulated by the RWQCB, and best management practices to prevent downstream erosion and pollution would need to be implemented in accordance with RWQCB permit requirements.

Earthwork such as grading, excavation, stockpiling soil and filling could generate loose sediment that could be carried to the San Dieguito River and downstream to the lagoon by flow in the river channel, particularly in the rainy season. Previously vegetated/planted areas could be made more susceptible to erosion by grading and excavation. Deposition of sediment downstream could cause ecological changes and smother riparian habitats.

Operation of equipment within and adjacent to the river for construction of project components such as relocated utilities (e.g., water and sewer pipelines), the new bridge, widening along Via de la Valle, and the proposed mitigation concept downstream (west) of the bridge, could generate debris and pollution that could be carried to the San Dieguito River, and downstream to the lagoon, particularly in the rainy season.

Measures that will be incorporated into project design plans and specifications to reduce potential water quality impacts during construction are presented in Section 3.7.5.

3.7.3.4 Issue 2b: Impacts of Completed Project on Water Quality in San Dieguito River and Lagoon

Road Runoff for All Alternatives. It is known that wetland vegetation provides beneficial water treatment of stream water flows. Routing runoff from urbanized areas, such as roadways, into vegetated swales prior to entering a sensitive water body is beneficial to water quality. In the study area, the drainage ditches currently along Via de la Valle and El Camino Real provide a useful water treatment function because of the wetland vegetation in the channels. In addition, the unlined ditches allow percolation of runoff into the soil and underlying groundwater, providing additional water treatment before flows enter the San Dieguito River and travel downstream to the San Dieguito Lagoon. The widened road would conservatively create an additional 3.5 to 9.0 acres of paved area subject to the collection of urban pollutants such as metals, fuel, and oil. However, all alternatives would either avoid impacts to the existing drainage ditch parallel to El Camino Real, which currently provides water treatment prior to runoff entering the San Dieguito River, or would restore this drainage ditch just to the east of the widened road and revegetate the new ditch. Drainage from the widened roadway would be routed to bio swales, hydrodynamic separators, or other appropriate permanent BMPs constructed

between the widened roadway and the existing or restored open drainage ditch, and these facilities would serve to "treat" runoff prior to the runoff entering the San Dieguito River. Therefore, the completed project would not adversely affect water quality in the river.

Sediment Transport and Scour for All Alternatives. The hydrologic study by Chang Consultants (Chang 2005) addressed the issue of sediment transport as follows. Hydraulic conditions in the San Dieguito River are under downstream control, which means that hydraulic conditions are affected by changes in the river downstream of a particular point, but not by upstream changes. Therefore, changes in the river from the proposed project would not affect the San Dieguito Lagoon Wetland Restoration Project, because El Camino Real bridge and the proposed mitigation concept area are upstream of the lagoon restoration project. The El Camino Real study area hydraulics could be affected by the lagoon restoration project, which has an upstream limit about 0.5 mile downstream (west) of the existing bridge. However, the lagoon restoration project has been studied extensively to insure that the project causes no impacts to the river with regard to the flood level, sediment transport, flow velocity and scour potential.

If the proposed El Camino Real Bridge/Road Widening Project were to change the existing pattern of sediment transport, the lagoon restoration project, downstream infrastructure, and beach sand supply could be affected. However, if the existing channel width is maintained for the bridge project, then the project should have minimum downstream impacts. This is the case for the proposed project. Also, without substantial removal of the bed material there should be no impacts on beach sand supply, which in the short-term is from sediment storage near the river mouth. For the proposed road/bridge project, removal of bed material is not planned. For the mitigation concept, there would be excavation of material from the existing fallow agricultural fields to lower the area and make it more conducive for sustained wetlands growth. The southern river bank downstream of the existing bridge would be widened to the south to provide mitigation area and would mimic the same width as the bridge crossing and river channel width upstream of the bridge. A berm would be constructed along this newly established southern bank to protect the larger mitigation area located behind the berm. An opening would be provided near the downstream end of the berm to allow flows in and out of the mitigation area located behind the berm. The existing patterns of sediment transport in the river would not change, however, because the vegetated protective berm constructed parallel to the southern river bank would help maintain similar velocities and sediment transport conditions.

If the existing riprap blanket currently in place in the river would be disturbed by construction, the riprap would be replaced. Therefore, for any build alternative, the existing protection that the riprap blanket provides would be maintained after the proposed project is completed.

3.7.3.5 Issue 2c: Impacts on Groundwater Quantity and Quality

All Alternatives. Due to the proximity of the river, the groundwater table in the study area is relatively high, and groundwater may flux in and out of the river bed. The new bridge would not change existing groundwater flow patterns in the river. During construction, the potential for temporary increases in sedimentation and adverse changes in water quality in the San Dieguito River exists, as discussed in Section 3.7.3.3. Adverse changes in surface water quality could affect groundwater quality as well. Measures that will be incorporated into project design plans and specifications to reduce potential water quality impacts during construction are presented in Section 3.7.5.

For all of the build alternatives, the open drainage ditch parallel to El Camino Real would either be unaffected or re-created, so existing percolation of groundwater would not be affected in that facility. The existing open drainage ditch parallel to Via de la Valle would be eliminated by all build alternatives. This ditch is about 10 feet wide and 1,000 feet long, so there would be approximately 0.23 acre less of land in an open drainage ditch available to percolate groundwater due to the project. This is a negligible decrease that would not affect groundwater conditions.

3.7.3.6 No Build Alternative

Under the No Build Alternative, none of the project components that would change flooding patterns, increase velocities, or create temporary water quality concerns would be constructed. Impacts to water resources would not occur. However, local drainage would not be routed more effectively, and the existing pattern of high flows crossing El Camino Real from east to west would continue.

3.7.4 Significance of Hydrology/Water Quality Impacts under CEQA

3.7.4.1 CEQA Significance Thresholds

The City significance thresholds relating to hydrology/water quality impacts from City of San Diego Significance Determination Thresholds (City of San Diego 2011) are summarized below.

Increased Flooding. If a project would result in increased flooding on- or off-site, significant impacts would result if the project would impose flood hazards on other properties or if the project proposes to develop wholly or partially within the 100-year floodplain identified in the FEMA maps. Council Policy 600-14 prohibits development within areas of special flood hazard except under certain circumstances. The policy requires approval by the floodplain administrator before construction, development or alteration begins within any area of special flood hazard. Land use significance thresholds specify the following related issue: The project would cause impacts if it significantly increased the base flood elevation for upstream properties, or constructed in a Special Flood Hazard Area or floodplain/wetland buffer zone.

Groundwater Quantity. If a project would result in decreased aquifer recharge there may be significant impacts on hydrologic conditions and well-water supplies because the area available for aquifer recharge is reduced. If a project would result in extraction of water from an aquifer, impacts on hydrologic conditions would be significant if there would be a net deficit in the aquifer volume or reduction in the local groundwater table.

Uncontrolled Runoff. If the project would grade, clear, or grub more than 1.0 acre of land, especially into slopes over a 25 percent grade, and would drain into a sensitive water body or stream, significant impacts would result if uncontrolled runoff caused erosion and subsequent sedimentation of downstream water bodies.

Modification of Drainage Patterns. If the project would result in modifications to existing drainage patterns, significant impacts would result (1) if the project would cause existing vegetation to decline because long- or short- term soil-plant-water relationships would no longer meet habitat requirements and there was a resulting degradation in the function and value of the existing habitat, or the habitat type changed; (2) if the project would result in substantial changes to stream-flow velocities or quantities; or (3) if adverse impacts would be experienced on downstream properties and/or environmental resources.

Water Quality. The City Significance Determination Thresholds (City of San Diego 2011) note that compliance with the Water Quality Standards is assured through permit conditions provided

by Land Development Review Engineering for private projects. For public projects, compliance is the responsibility of the particular department implementing the project. Adherence to the City's Storm Water Standards is the Water Quality threshold. Adherence to the City's Storm Water Standards is considered to preclude water quality impacts unless substantial evidence supports a fair argument that a significant impact will still occur. The thresholds also note that if it is determined that BMPs above what is required to achieve compliance with the City's Water Quality Standards are to be used in order to protect another specific environmental resource such as biological resources, the BMPs should be regarded as mitigation measures, and included in the mitigation discussion under the heading of the resource they are meant to protect.

If the project discharges into receiving waters within Environmentally Sensitive Lands or waterbodies listed on the Regional Water Quality Control Board 303(d) Impaired Water Body List, and the potential exists for significant impacts to biological resources, the biological report and the environmental document should discuss the BMPs to be implemented in order to preclude impacts to biological resources. This potential impact is addressed in Section 3.12: Biological Resources.

3.7.4.2 Determination of Significance under CEQA

The conclusions of significance under CEQA for the alternatives analyzed are summarized in Table 3.7-5, and discussed below.

Increased Flooding. Impacts would not be significant for any of the build alternatives. None of the build alternatives would permanently increase 100-year water surface elevations on other properties, as shown by the hydraulic analysis for the project (Rick 2012). During the time of construction, there would be a risk of 100-year water surface elevations increasing by more than 1 foot due to the temporary installation of a berm or trestle working platform in the channel. However this effect would only occur during the approximately 18 months of construction, and so is not concluded to be significant. The project would be built within the 100-year floodplain, but this is so that the new bridge would be above the 100-year flood level and so the road would be raised on fill above the 100-year flood level. The City floodplain administrator will review the project in accordance with Council Policy 600-14.

Groundwater Quantity. Impacts to groundwater quantity would not be significant for any of the build alternatives. The project would not impact groundwater recharge, and no extraction of groundwater is planned. No deficit in the aquifer volume or reduction in the local groundwater table would be expected to occur.

Uncontrolled Runoff. Impacts would not be significant for any of the build alternatives. None of the alternatives would cause uncontrolled runoff or grade into slopes over 25 percent. All alternatives would substantially improve local drainage for the culvert crossing under Via de la Valle, and would maintain the hydraulic conditions of the drainage ditch parallel to El Camino Real into the San Dieguito River. The increase in local runoff from the additional paved area would be negligible. Temporary and permanent BMPs would prevent erosion and sedimentation into downstream water bodies, including the San Dieguito River. The drainage ditch parallel to El Camino El Camino Real would be retained or recreated for all build alternatives.

Impact	Threshold	Central	Road Capacity	Bicycle Safety	Western	Eastern	Round- about	Lower Elevation	No Build
Increased Flooding	Imposition of flood hazards on other properties, or develop within the 100-year floodplain.	NS	NS	NS	NS	NS	NS	NS	NS
Groundwater quantity	Cause a net deficit in the aquifer volume or reduction in local groundwater table.	NS	NS	NS	NS	NS	NS	NS	NS
Uncontrolled runoff	Generation of erosion and sedimentation downstream	NS	NS	NS	NS	NS	NS	NS	NS
Modification of Drainage Patterns	Decline in vegetation	NS	NS	NS	NS	NS	NS	NS	NS
	Substantial changes to stream-flow velocities or quantities.	SM	SM	SM	SM	SM	SM	SM	NS
	Adverse impacts downstream	NS	NS	NS	NS	NS	NS	NS	NS
Construction impacts on water quality	Compliance with Water Quality Standards.	SM	SM	SM	SM	SM	SM	SM	NS
Permanent impacts on water quality	Compliance with Water Quality Standards.	NS	NS	NS	NS	NS	NS	NS	NS

Table 3.7-5 Summary of CEQA Significance for Hydrology/Water Quality Impacts

NS = Not significant

SM = Significant and mitigable to below a level of significance

SU = Significant and unmitigable

Modification of Drainage Patterns. In terms of water supply to vegetation, the existing drainage patterns in the San Dieguito River and from the watershed north of Via de la Valle would not change with the new bridge and widened roadway for any of the build alternatives. The existing open drainage ditch parallel to the south edge of Via de la Valle would be eliminated by all build alternatives, but would be replaced with a low-flow buried storm drain that would convey low flows to the ditch parallel to El Camino Real, thus maintaining the drainage pattern.

In terms of downstream properties and/or environmental resources, the 10-year flood velocities would remain similar for existing and proposed conditions for all alternatives since the main river channel conveys the 10-year storm event and is not restricted from the existing or proposed bridge crossing. Therefore, hydraulic conditions upstream of the bridge remain similar to existing conditions during more frequent storm events (up to the 10-year storm).

In terms of downstream properties and/or environmental resources, none of the build alternatives would increase 100-year flood velocities west of the bridge, so no adverse impacts downstream would be caused by the project. However, all of the build alternatives would slightly increase 100-year velocities in the river upstream (east) of the road and bridge. At one cross section upstream of the new bridge, velocities would increase from being borderline erosional (from 3 fps to 6 fps) to erosional (greater than 6 fps). Also, at several cross sections around the new bridge, velocities already in the erosional range (greater than 6 fps) in existing conditions would increase in the 100-year flood event with the proposed project. These changes in 100-year flood velocities are concluded to be substantial, and impacts in terms of changes to stream flow velocities are concluded to be significant.

Water Quality. All alternatives would comply with the City Water Quality Standards. However, impacts to surface water quality during construction were concluded to be significant for all build alternatives because additional BMPs may be required by the permitting agencies to protect clapper rail and their habitat upstream of the bridge. These measures would be developed during negotiations for the permits, but negotiations cannot be held until the Draft EIR is completed and provided for public review. In addition, runoff from the project discharges into receiving waters within Environmentally Sensitive Lands and the San Dieguito River, which is listed on the Regional Water Quality Control Board 303(d) Impaired Water Body List, and the potential exists for significant impacts to biological resources. However, with all mitigation measures and permit conditions incorporated, impacts after project completion would not be significant for any of the build alternatives.

3.7.5 Mitigation Measures

Hyd-1 To mitigate impacts associated with the increase of 100-year velocities in the river to above erosional levels, prior to bid opening/bid award, City staff shall verify that plans to provide <u>buried</u> bank protection along the northern bank of the river for 500 feet east of the new bridge have been incorporated into the project plans and specifications. The bank protection shall be designed in accordance with the following concept to prevent impacts to wetlands in the river: place a temporary construction fence/environmental fence at the point of the slope where the habitat line ends. On the upstream side, remove the slope, creating a notch that is back cut from the environmental fence to the desired elevation. Fill in and rebuild the slope, with buried riprap and/or matting, up to the necessary height. The construction zone would be from the trail edge on top down to the environmental habitat limit lower on the slope. The slope would be refilled and re-contoured and revegetated with native plant materials as directed by the permitting agencies. The existing trail shall be repaired to existing condition or better. A temporary trail would be provided so there would be no interruption in access during construction.

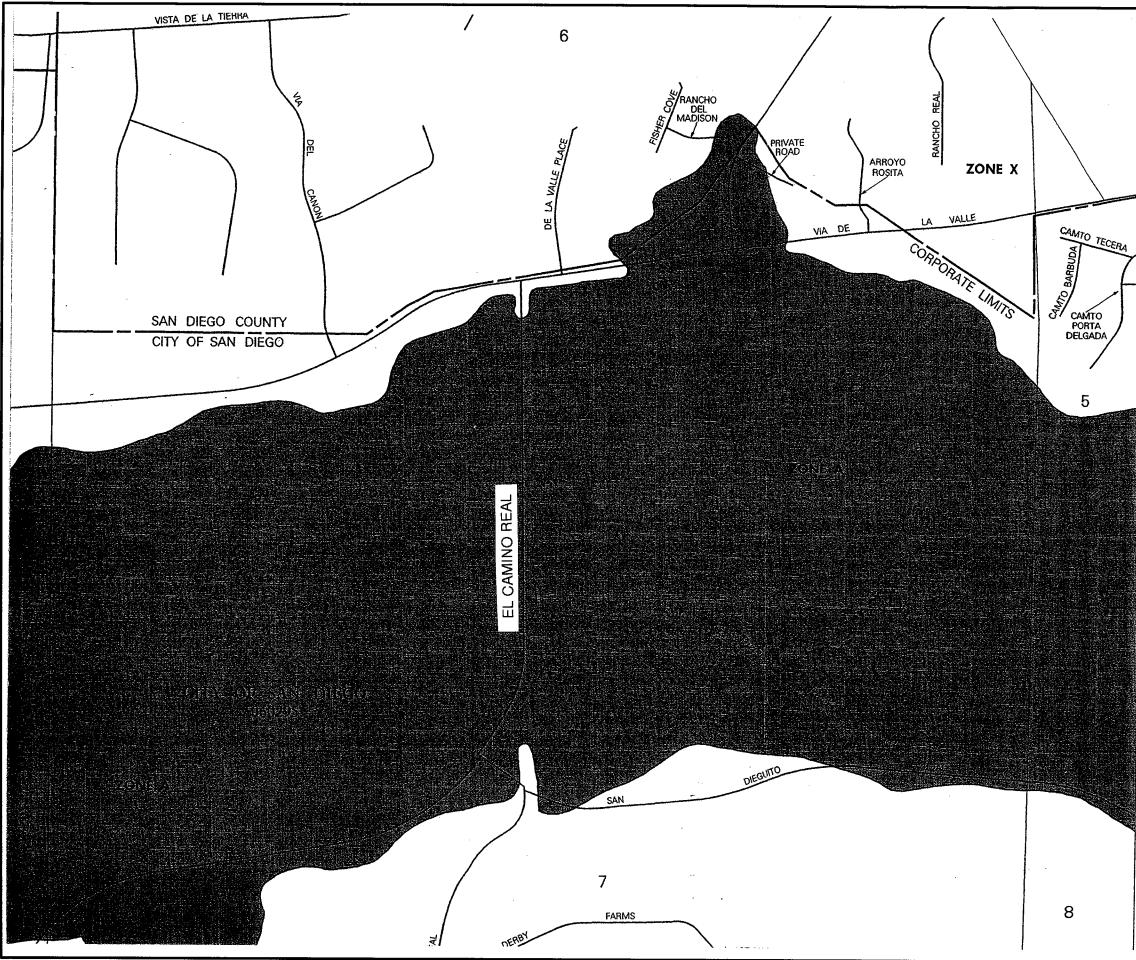
Hyd-2 To mitigate construction impacts associated with water quality, prior to bid opening/bid award, City staff shall verify that a Stormwater Pollution Prevention Plan (SWPPP) is incorporated into the construction specifications and plans, and that the SWPPP includes all conditions that may have been added by the permitting agencies to protect the endangered clapper rail upstream of the bridge. The SWPPP shall identify all construction BMP requirements required by the City Storm Water Standards, January 20, 2012, in accordance with SWRCB NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities Order No. 2009-0009-DWQ NPDES No. CAS000002 (adopted September 2, 2009) and/or the most recent update. Both erosion and sediment control BMPs shall be installed and maintained in addition to good housekeeping and site and materials management. Copies of the SWPPP shall be retained at the construction site and at City offices. Examples of Construction BMPs that may be included in the SWPPP are as follows:

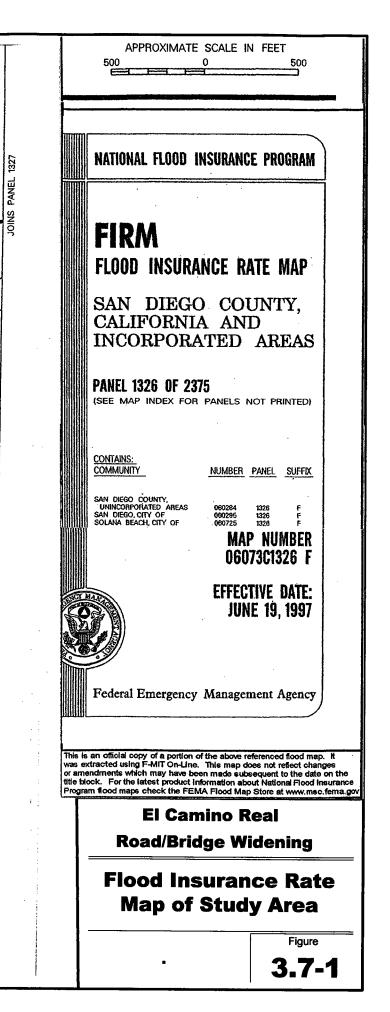
- BMPs for physical and vegetation stabilization, such as geotextiles, mats, fiber blankets, hydraulic mulch, Bonded Fiber Matrix, and sprayed-on binders.
- BMPs for sediment control such as silt fencing, gravel bag barriers, and fiber rolls.
- BMPs for prevention of off-site sediment tracking, such as stabilized construction entrances/exits, corrugated steel panels, and dust control.
- BMPs for materials management, such as protecting stockpiles from wind and rain, covering and/or providing secondary containment of storage areas, and specifying precautions for materials handling.

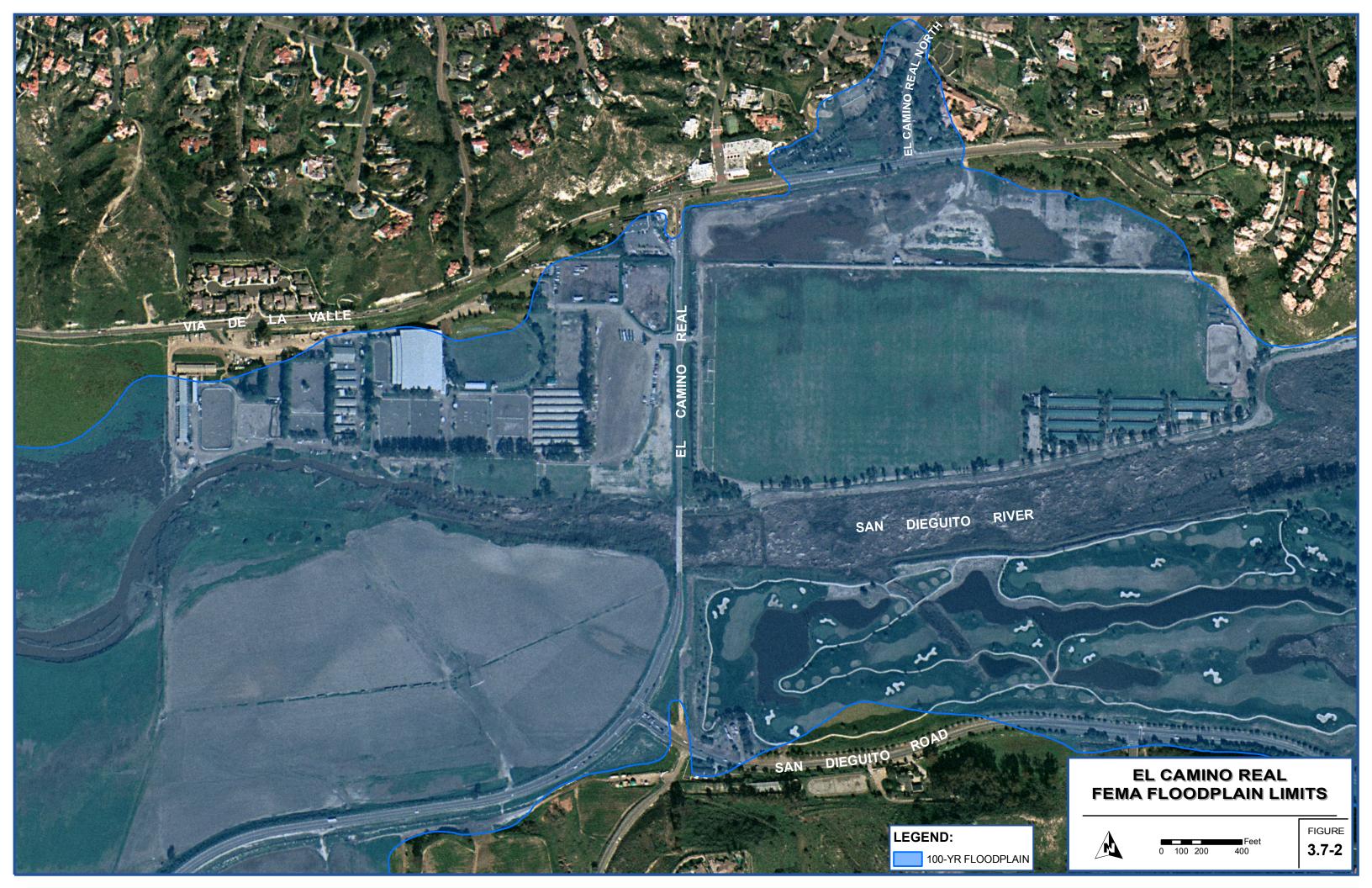
3.7.6 Significant and Unmitigable Impacts under CEQA

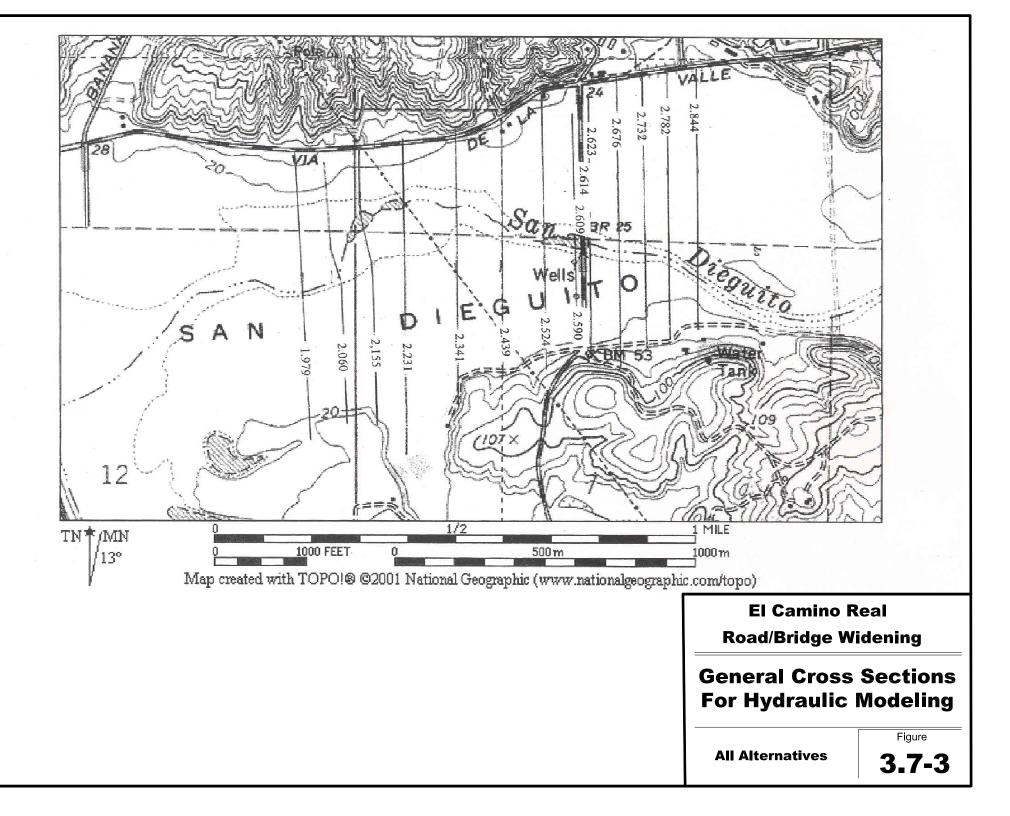
Implementation of the above measures would mitigate all CEQA impacts of the build alternatives to below a level of significance. No unmitigable impacts would occur for the build alternatives.

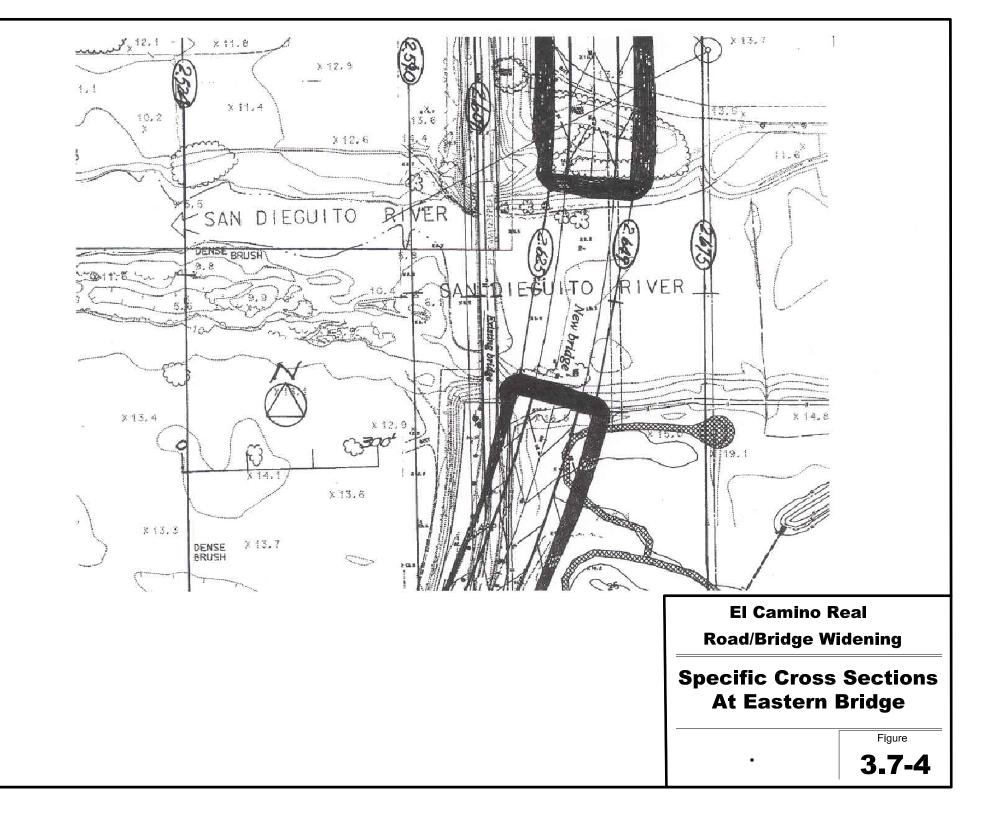
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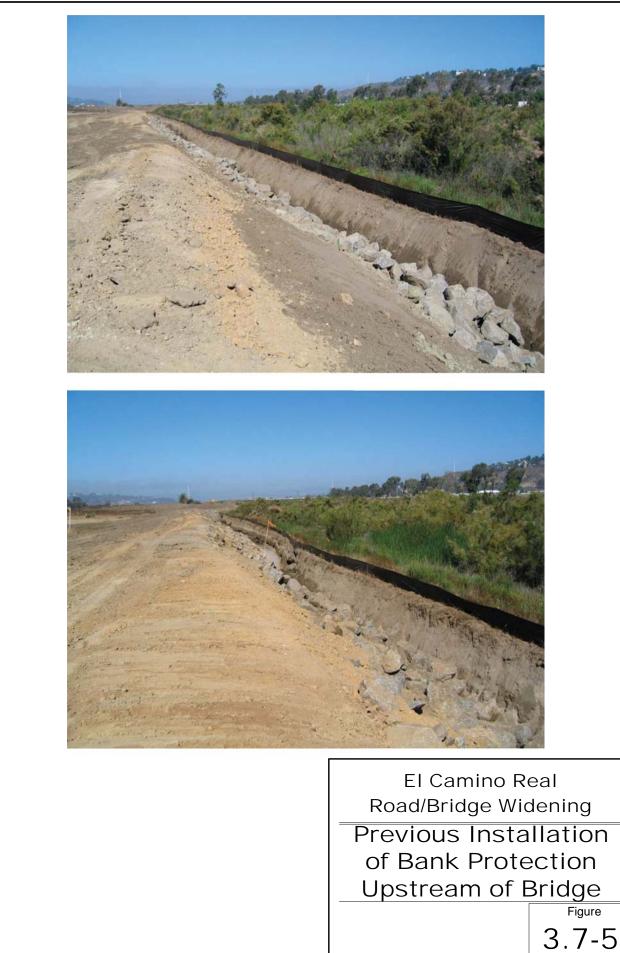












3.8 GEOLOGY/SEISMICITY/SOILS

This section evaluates the impacts of the proposed project on and from geologic, seismic, and soils conditions in the study area. This section is based on the Final Geotechnical Report for El Camino Real Roadway Widening (Ninyo & Moore 2006, updated 2012), and the Revised Geotechnical Report, El Camino Real/San Dieguito River Bridge Project (Ninyo & Moore 2005, updated 2012). These reports were originally prepared in 1998, updated in 2006 and 2005, respectively, and updated in 2012 via a letter memorandum dated December 4 for the recirculated EIR. These separate technical reports and the update letter are incorporated into this recirculated EIR by reference, and are available for inspection at the City of San Diego. In addition, a separate review letter indicates that Ninyo & Moore reviewed information regarding site geology characterization, geologic hazards, identification of impacts, significance of impacts, and mitigation measures to verify that the information in the EIR is in accordance with the findings, conclusions, and recommendations from the technical appendices. All recommendations in the review letter have been incorporated into this recirculated EIR. Geologic issues addressed in this section include the following:

- Geologic Hazards/Seismicity
- Soils Conditions
- Impacts from Erosion
- Hazardous Waste/Materials

Project impacts can occur from locating facilities in areas with geotechnical and geologic hazards, or from eliminating the ability to utilize geologic or mineral resources.

3.8.1 Regulatory Setting

The following regulations are relevant to geology/soils/mineral resources/hazardous materials:

- <u>Alquist-Priolo Special Studies Zones Act of 1972</u>. The intent of this act is to require fault investigations on sites located within Earthquake Fault Zones to preclude new construction of certain inhabited structures across the trace of active faults.
- <u>Surface Mining and Reclamation Act of 1975</u>. The California Legislature enacted this Act to establish an effective and comprehensive surface mining and reclamation policy.
- <u>Resource Conservation and Recovery Act of 1976</u>. This federal law is the primary source of regulations regarding the handling of hazardous waste material, including waste that is generated during environmental cleanup operations.
- <u>FHWA Supplemental Hazardous Waste Guidance Memorandum, dated January 16, 1997</u>. This memorandum requires an assessment in the environmental document of potential hazardous materials that may be encountered and an estimate of the most likely case for the extent/cleanup/cost of potential contamination within the construction zone of the Preferred Alternative, when one is identified.

3.8.2 Affected Environment

3.8.2.1 Regional Setting

Like most of San Diego County, the study area is located within the Peninsular Ranges Geomorphic Province. This province encompasses a coastal plain on the west and northwesttrending mountain ranges and foothills to the east. The coastal flank of the mountainous portion was subject to marine inundation and regression over the past 54 million years. During this time, marine and nonmarine sediments such as claystones and conglomerates were deposited on the granitic basement rocks formed by the Southern California Batholith. Subsequently, streams eroded deep canyons and deposited alluvial sediments in canyons and on stream terraces.

Structurally, the Peninsular Ranges Geomorphic Province has been uplifted and tilted to the west. The eastern flank has the highest altitude and most rugged topography; altitudes gradually decrease toward the west. In terms of tectonics (faulting), numerous active, northwest-trending, right-lateral strike slip fault zones cross the Province. These include the San Andreas, San Jacinto, and Elsinore faults to the east and north, and the Rose Canyon and Newport-Inglewood faults near the coast.

3.8.2.2 Existing Local Geologic/Seismic Conditions

Local Topographic Setting. The local study area is in the northwest part of the NCFUA. The topography of the NCFUA is noted in the Framework Plan EIR (City of San Diego 1992) as including rugged, steeply sloping hillside terrain, gently rolling hills and nearly flat-lying mesas, and stream-cut canyon bottoms and flood plains. The more rugged terrain is characteristic of the portions of the area underlain by hard metavolcanic rocks and/or gabbros, primarily in the northeastern portion of the NCFUA. Sedimentary deposits form a more gentle morphology. The area along and adjacent to El Camino Real is generally flat and at relatively low elevations, approximately 5 feet to 30 feet above msl, as discussed in Section 1.6.3. The San Dieguito River channel at the bridge is at an elevation of approximately 0 feet to 2 feet above msl. North of Via de la Valle, the natural topography consists of steep canyons running in a north-south direction separated by narrow ridges and bluffs, with many slopes exceeding 25 percent.

Local Geologic Setting. The part of El Camino Real addressed in this recirculated EIR is indicated on the Geologic Formations map as underlain by alluvium + slopewash. Such alluvial soils are noted as being found in most of the canyon bottoms in the area, including the San Dieguito River floodplain. The Framework Plan EIR also notes that within the main streambeds, the alluvial soils may contain a large amount of cobbles and some boulders, while the alluvial soils within the tributaries are expected to be predominantly fine-grained silts. The geology map for the Del Mar Area (Kennedy and Tan 2008) indicates that the northern end of the study area, portions of Via de la Valle, and the southern end of the study area at San Dieguito Road are underlain by Old Paralic Deposits (formerly designated the Bay Point Formation). This lagoonal and nonmarine sandstone is from the upper Pleistocene geologic era. The formation is described as being composed mostly of marine and nonmarine, poorly consolidated, fine- and medium-grained, pale brown, fossiliferous sandstone.

Based on the project-specific roadway geotechnical study (Ninyo & Moore 2006, updated 2012), which included subsurface exploration, review of published geologic maps of the area, and review of stereoscopic aerial photographs, the geologic units present in the study area consist of fill and alluvium. Fill consisted of light brown to dark brown and reddish brown, damp to moist, very loose to medium dense, silty and clayey sand, and firm sandy clay. Alluvium consisted of

brown to dark brown, dark gray and black, moist to saturated, very loose to dense, silty to clayey sand and fine sand, and saturated, very soft to firm, silty clay to clayey silt. A total of six borings along El Camino Real were drilled and analyzed in 1998. The locations of borings are shown in Figure 3.8-1. Borehole logs for Boreholes B-1 through B-6 are in the roadway geotechnical report (Ninyo & Moore 2006, updated 2012). Findings of the borings are summarized in Table 3.8-1.

Groundwater was encountered consistently at relatively shallow depths, as little as 7 feet below ground surface. The depth at which groundwater was encountered increased south of the river, toward San Dieguito Road. Local fluctuations in groundwater levels can be expected to occur due to storm water flow in the San Dieguito River, and due to variations in ground surface topography, subsurface geologic conditions, rainfall, irrigation, and other factors.

The depth of fill along the road was the least near Via de la Valle, although no fill was encountered in Boring B-4 on the south side of the San Dieguito River. Alluvium was encountered to the total depth of all borings.

Boring Number	Total Depth	Depth to Groundwater	Depth of Fill	Depth of Alluvium
B-1	20 feet	9 feet	2.5 feet	17.5 feet +
B-2	20 feet	7 feet	2 feet	18 feet +
B-3	90 feet	8 feet	5 feet	85 feet
B-4	96.5 feet	12 feet	0 feet	96.5 feet +
B-5	20 feet	19.5 feet	13 feet	7 feet +
B-6	20 feet	19.5 feet	8 feet	12 feet +

Table 3.8-1Summary of Findings from Borings B-1 through B-6

Source: (Ninyo & Moore 2006)

In addition to Borings B-1 through B-6, two cone penetrometer test (CPT) soundings were taken in 1998 on the north and south banks of the river. These soundings were extended to approximately 110 feet.

Four exploratory small-diameter borings were performed on June 13, 2005 across the proposed wetlands mitigation site on the formerly farmed JPA Mitigation Site west of El Camino Real. See Section 3.12.5 for a discussion of the mitigation concept and site. The borings were drilled to provide subsurface data on the depth to groundwater. Logs for Borings B-7 through B-10 are in the bridge geotechnical report (Ninyo & Moore 2005, updated 2012). These borings were only drilled until groundwater was encountered, from 3 to 6 feet below the ground surface.

Local Tectonic Setting/Seismicity. The study area is considered to be in a seismically active area, as is most of southern California. However, based on review of geologic maps and stereoscopic aerial photographs, the project-specific geotechnical report concluded that no active faults are known to cross the road/bridge site.

A number of active and potentially active faults in the regional area could generate strong ground motion. By definition of the State Mining and Geology Board, an active fault is one which has had surface displacement within the Holocene Epoch (roughly the last 11,000 years). The State Geologist has defined a potentially active fault as any fault that has been active during the Quaternary Period (approximately the last 1.6 million years). These definitions are used in

delineating Earthquake Fault Zones as mandated by the Alquist-Priolo Geologic Zones Act of 1972 as revised. The intent of the act is to require fault investigations on sites located within Earthquake Fault Zones to preclude new construction of certain inhabited structures across the trace of active faults. The study area is not included within an earthquake fault zone created by the Alquist-Priolo Act.

Known active and potentially active fault zones within approximately 50 miles of the site are listed in Table 3.8-2, which also presents the estimated moment magnitude seismic events that could occur on these faults.

The data in Table 3.8-2 indicate that the most severe seismic event at the site would be a magnitude 7.2 earthquake on the Rose Canyon fault, which is the closest to the study area, at only 4.4 miles away. The City of San Diego Seismic Safety Study: Geological Hazards and Faults (City of San Diego 2008c) noted that the Rose Canyon fault zone has been described as active and capable of producing a major seismic event, and that faults within this fault zone are among those known faults within the City that appear capable of generating the most damaging earthquakes in the area. The Public Facilities, Services, and Safety Element of the 2008 General Plan identifies the project area as being in a low to moderate geotechnical and relative risk area.

Earthquake magnitude, as measured by the Richter Scale and moment magnitude scale, is an indication of the amount of energy released in that earthquake. Earthquake magnitude as measured by earthquake moment differs from the Richter scale, particularly for earthquakes with moment magnitudes greater than 5.0. Another scale to rate earthquake events is the Modified Mercalli Scale, which expresses the severity of an earthquake in terms of observed effects on people and structures. The Modified Mercalli Scale and corresponding Richter Scale values are presented in Table 3.8-3. The Modified Mercalli intensity of the Rose Canyon event experienced at the study area would be in the range from IX to X. These levels of seismic events could cause serious damage to many structures.

Fault	Distance miles (kilometers) ^{1,2}	Moment Magnitude ²		
Rose Canyon	4.4 (7.1)	7.2		
Newport-Inglewood (Offshore)	17 (21)	7.1		
Coronado Bank	18 (29)	7.6		
Elsinore (Julian Segment)	30 (48)	7.1		
Elsinore (Temecula Segment)	30 (49)	6.8		

Table 3.8-2Principal Active Faults

Source (Ninyo & Moore 2005, updated 2012) Notes: ¹ Blake (2001); ² Cao, et al. (2003)

Table 3.8-3 Modified Mercalli Scale of Earthquake Intensities

	Modified Mercalli	Richte
If most of these effects are observed	Intensity is	
Earthquake shaking not felt. But people may observe marginal effects of large distance earthquakes without identifying these effects as earthquake-caused. Among them: trees, structures, liquids, bodies of water sway slowly, or doors swing slowly.	Ι	3.0
Effect on people: Shaking felt by those at rest, especially if they are indoors, and by those on upper floors.	II	3.5
Effect on people : Felt by most people indoors. Some can estimate duration of shaking. But many may not recognize shaking of building as caused by an earthquake; the shaking is like that caused by the passing	Ш	4.2
of light trucks. Other effects: Hanging objects swing. Structural effects: Windows or doors rattle. Wooden walls and frames creak.	IV	4.5
Effect on people : Felt by everyone indoors. Many estimate duration of shaking. But they still may not recognize it as caused by an earthquake. The shaking is like that caused by the passing of heavy trucks, though sometimes, instead, people may feel the sensation of a jolt, as if a heavy ball had struck the walls. Other effects : Hanging objects swing. Standing autos rock. Crockery clashes, dishes rattle or glasses clink.	v	4.8
Structural effects: Doors close, open or swing. Windows rattle. Effect on people: Felt by everyone indoors and by most people outdoors. Many now estimate not only	VI	5.4
the duration of shaking but also its direction and have no doubt as to its cause. Sleepers wakened. Other effects: Hanging objects swing. Shutters or pictures move. Pendulum clocks stop, start, or change rate. Standing autos rock. Crockery clashes, dishes rattle or glasses clink. Liquids disturbed, some spilled. Small unstable objects displaced or upset. Structural effects: Weak plaster and Masonry D* crack. Windows break. Doors close, open, or swing.	VI	3.4
 Effect on people: Felt by everyone. Many are frightened and run outdoors. People walk unsteadily. Other effects: Small church or school bells ring. Pictures thrown off walls, knicknacks and books off shelves. Dishes or glasses broken. Furniture moved or overturned. Trees, bushes, shaken visibly, or heard to rustle. Structural effects: Masonry D* damaged; some cracks in Masonry C*. Weak chimneys break at roof line. Plaster, loose bricks, stones, tiles, cornices, unbraced parapets, and architectural ornaments fall. Concrete irrigation ditches damaged. 	VII	6.1
Effect on people: Difficult to stand. Shaking noticed by auto drivers. Other effects: Waves on ponds; water turbid with mud. Small slides and caving in along sand or gravel banks. Large bells ring. Furniture broken. Hanging objects quiver. Structural effects: Masonry D* heavily damaged; Masonry C* damaged, partially collapses in some cases: some damage to Masonry B*; none to Masonry A*. Stucco and some masonry walls fall. Chimneys, factory stacks, monuments, towers, elevated tanks twist or fall. Frame houses moved on foundations if not bolted down; loose panel walls thrown out. Decayed piling broken off.	VIII	6.5
Effect on people: General fright. People thrown to ground. Other effects: Changes in flow or temperature of springs and wells. Cracks in wet ground and on steep slopes. Steering of autos affected. Branches broken from trees. Structural effects: Masonry D* destroyed; Masonry C* heavily damaged, sometimes with complete collapse; Masonry B* is seriously damaged. General damage to foundations. Frame structures, if not bolted, shifted off foundations. Frames cracked. Reservoirs seriously damaged. Underground pipes broken.	IX	6.9
Effect on people: General panic.	Х	7.3
Other effects: Conspicuous cracks in ground. In areas of soft ground, sand is ejected through holes and piles up into a small crater, and, in muddy areas, water fountains are formed. Structural effects: Most masonry and frame structures destroyed along with their foundations. Some well-built wooden structures and bridges destroyed. Serious damage to dams, dikes, and embankments. Railroads bent slightly.	Δ	
Effect on people: General panic. Other effects: Large landslides. Water thrown on banks of canals, rivers, lakes, etc. Sand and mud shifted horizontally on beaches and flat land. Structural effects: General destruction of buildings. Underground pipelines completely out of service.	XI	8.1
Railroads bent greatly.		
Effect on people: General panic.	XII	8.2+
Other effects: Same as for Intensity X. Structural effects: Damage nearly total, the ultimate catastrophe. Other effects: Large rock masses displaced. Lines of sight and level distorted. Objects thrown into air		
Other effects: Large rock masses displaced. Lines of sight and level distorted. Objects thrown into air. * Masonry A: Good workmanship and mortar, reinforced, designed to resist lateral forces.	+	
 Masonry A: Good workmanship and mortar, reinforced, designed to resist lateral forces. Masonry B: Good workmanship and mortar, reinforced. Masonry C: Good workmanship and mortar, unreinforced. 		
* Masonry D: Poor workmanship and mortar and weak materials, like adobe.		

Geologic Hazards. The following are geologic hazards that could affect an area:

- Ground Shaking Movement of the ground surface and underlying formations from an earthquake.
- Fault Rupture Displacement of the ground surface in direct response to movement along a fault.
- Liquefaction Transformation of loose, granular silts or sands that are saturated with groundwater from a solid into a liquid state because of earthquake vibrations.
- Landslide The downslope movement of soil or rock material from gravitational or other forces, such as a seismic event.
- Seiches An earthquake induced wave occurring in a relatively large confined body of water, such as a reservoir.

As discussed above, the project site has a high potential for experiencing strong ground motion, due to the potential for a large seismic event on the relatively near Rose Canyon fault.

Fault rupture is considered unlikely at the project site due to the absence of known active and potentially active faults on the site. The potential for lurching or cracking of the ground surface as a result of nearby or distant seismic events is also considered unlikely (Ninyo & Moore 2006, updated 2012).

Liquefaction at the project site where the sediments could lose strength and fail to support overlying structures, is considered likely. The previous Seismic Safety Element of the City Progress Guide and General Plan (City of San Diego 1989) noted that loose fine-grained sands and silts below the groundwater table are most susceptible to liquefaction, and that Modified Mercalli Intensity VII may be sufficient to cause localized liquefaction of especially susceptible deposits. The project site is located within geologic hazard zones 31 and 32 as shown on the City's current Seismic Safety Study Geologic Hazards Maps. Hazard Zone 31 is characterized by a high potential for liquefaction-shallow groundwater, major drainages, and hydraulic fills. Hazard Zone 32 is characterized by fluctuating groundwater within minor drainages where the potential for liquefaction is low.

The project-specific geotechnical reports indicated that liquefaction could occur at elevations of 0 to 20 feet below msl, and at elevations of 43 to 56 feet below msl within the layers of loose and sandy alluvium encountered in borings along the existing road alignment. The liquefaction was estimated to be capable of inducing 2 to 12 inches of dynamic settlement. The potential for liquefaction and dynamic settlement is expected to be variable across the site, based on the variable and sinuous deposition of sandy river channel deposits across the river valley. More liquefiable material was encountered in the CPT exploration on the north side of the river than on the south side, as documented in the bridge geotechnical report (Ninyo & Moore 2005, updated 2012). Lateral spread, a ground failure in which blocks of mostly intact surface soil displace downslope, may also result from liquefaction. This type of failure could occur to the bridge approach embankments may be susceptible to horizontal ground displacements of roughly 3 to 10 feet as a result of liquefaction-induced lateral spread in the event of a major nearby earthquake (Ninyo & Moore 2005, updated 2012).

Landslides were mapped along the north edge of Via de la Valle, as close as approximately 2,660 feet west of El Camino Real in the Via de la Valle Specific Plan (City of San Diego 1984). The north side of Via de la Valle would only be disturbed as part of the Roundabout Alternative, but no landslides have been identified in the relatively flat study area.

Damage from a seiche is not considered likely in the study area. The Seismic Safety Element of the City of San Diego Progress Guide and General Plan (City of San Diego 1989) noted that earthquake induced waves in a confined body of water could cause waves up to tens of feet high, which could cause extensive damage along a shoreline. However, the nearest confined water body, San Dieguito Lagoon, is nearly 8,000 feet west of El Camino Real.

Soils. The soil types within the study area were identified based on the reports and maps in the Soil Survey for the San Diego Area (Soil Conservation Service [SCS] 1973). The four basic soil types in the study area are as follows:

- Corralitos loamy sand, 5 to 9 percent slope (CsC)
- Grangeville fine sandy loam, 0 to 2 percent slope (GoA)
- Terrace escarpments (TeF)
- Tujunga sand, 0 to 5 percent slope (TuB)

Table 3.8-4 summarizes characteristics of these soils that are generally of concern for project design.

Soil Name (Symbol)/	Percent	Erosion Potential /	Shrink-Swell	Suitability as	Suitability for
Project Location	Slope	Hydrologic Group	Behavior	Source of	Road Fill
Corralitos loamy sand	5 to 9	Severe erodibility due	Low	Sand	Good
(CsC) /		to surface layer texture/			
South side of Via de		Hydrologic Group A			
la Valle		(low runoff potential)			
Grangeville fine	0 to 2	Severe erodibility due	Low	Unsuitable	Fair
sandy loam (GoA) /		to grade of structure in			
North and south ends		the surface layer/			
of El Camino Real,		Hydrologic Group B			
east part of Via de la		(moderate runoff			
Valle		potential)			
Terrace escarpments		Severe erodibility due	Variable	Unsuitable	Not rated
(TeF) /		to slope/			
North side of Via de		Hydrologic Group D			
la Valle		(high runoff potential)			
Tujunga sand (TuB) /	0 to 5	Severe erodibility due	Low	Sand	Good
Most of El Camino		to surface layer texture/			
Real and adjacent		Hydrologic Group A			
river valley		(low runoff potential)			

Table 3.8-4Soil Characteristics for the Project Study Area

Source: SCS 1973

The corrosion potential of onsite soils was evaluated in the roadway geotechnical report for the project (Ninyo & Moore 2006, updated 2012). Corrosivity tests were performed on samples from the subsurface evaluation. The soils were analyzed to evaluate the effect of corrosion on underground culverts and surface structures. Test results indicated that the pH of the soils ranged from 6.8 to 7.8. Tested chloride contents ranged from 20 to 1,000 parts per million (ppm), which indicates a potential for severely corrosive conditions for ferrous metals. The minimum electrical resistivity, which ranged from 300 to 7,500 ohm-cm, also indicated that the onsite soils may be considered severely corrosive to ferrous metals. Testing of selected soil samples indicated that soluble sulfate contents ranged from 0.003 to 0.124 percent, which indicated a potential for moderate corrosion to cement (an integral component of concrete). Concrete in contact with soil or water that contains high concentrations of sulfates can be subject to chemical deterioration. In accordance with Caltrans guidelines, the project site may be considered to be corrosive.

Initial Site Assessment and Hazardous Materials Data Base Records Search. Federal, state and local environmental databases of reported hazardous waste sites for the project were reviewed to determine if any known sites are within the project area, and a report was provided by Environmental Data Resources, Inc. (EDR; 2003). The databases were reviewed to evaluate the potential for subsurface soil and /or groundwater contamination to be present on the site from an unauthorized release of hazardous materials or wastes. Lists searched include the following:

Federal Lists

- National Priority List
- Proposed National Priority List Sites
- Comprehensive Environmental Response, Compensation, and Liability Information System
- Corrective Action Report
- Resource Conservation and Recovery Information System (RCRIS)
- Facility Index System (FINDS)

State Lists

- Proposition 65 Records
- List of Underground Storage Tank Facilities
- California Hazardous Material Incident Report System (CHMIRS)
- Cortese List
- Leaking Underground Storage Tank Incident Report (LUST)
- Drycleaners List
- HAZNET list

Local Lists

• San Diego County Hazardous Materials Management Division Database (HMMD)

Existing potential hazardous material sites within 1,320 feet, or ¹/₄ mile of the project are compiled in Table 3.8-5. Only the Roundabout Alternative is adjacent to any of the sites. None of the information retrieved indicates ongoing hazardous materials issues that could cause contamination of soil or groundwater that would interfere with construction of the proposed project components.

Facility	Address	EDR	List(s) Where	Proximity to Project	Description/Status
Name		Map ID	Site Appears	Area	~ · · · · · ·
David Plank Estate	14905 El Camino Real	1	- HAZNET - LUST - Cortese - San Diego County HMMD	900 feet north of Via de la Valle on El Camino Real North	Soil contamination from diesel tank leakage due to corrosion, reported in August 1995. Soil removed and disposed, cap installed to reduce rainfall infiltration. Case closed January 1997.
N/A	3790 Via de la Valle	2	CHMIRS	380 feet east of El Camino Real North and 142 feet north of Via de la Valle	Motor oil from a car spilled on the ground, reported in February 1991.
Morgan Run Resort	4000 Via de la Valle	3	HAZNET	1,560 feet east of El Camino Real North	Noted as recycler of oil- containing waste
Casa Palmera Care Center	14750 El Camino Real	4	San Diego County HMMD	190 feet north of Via de la Valle on El Camino Real North	Medical facility storing diesel fuel and oxygen, with general infectious waste stream. Waste labeling violations noted in 1998 and 2002.
Silver Hanger Dry Cleaners	3790 Via de la Valle	5	- RCRIS-SQG - FINDS - San Diego County HMMD - Cleaners	425 feet east of El Camino Real North	Dry cleaners, classified as a Small Quantity Generator. No violations found.
All Creatures Animal Hospital	3665 Via de la Valle	6	- HAZNET - San Diego County HMMD	400 feet west of El Camino Real	Noted as a Small Quantity Medical Waste Generator. Documentation of personnel training in medical waste disposal violation noted in 1995.
Mobile Gas Station	2750 Via de la Valle	Not mapped	- HAZNET - LUST	Approx. 950 feet west of El Camino Real	Included as an "orphan" site in the EDR report, noted as unable to be mapped due to poor or inadequate address information.

Table 3.8-5Potential Hazardous Waste Sites in the Project Vicinity

Source: EDR 2003

Mineral Resources. The Surface Mining and Reclamation Act of 1975 requires the State Geologist to classify areas in terms of whether or not mineral deposits are present. The classification was to be made on the basis solely of geologic factors, without considering land use and ownership. The State Mining and Geology Board subsequently defined the following Mineral Resource Zones (MRZ):

- MRZ-1: Areas where adequate information indicates that no significant mineral deposits are present, or where it is judged that there is little likelihood for their presence.
- MRZ-2: Areas where adequate information indicates that significant mineral deposits are
 present or where it is judged that there is a high likelihood for their presence.
- MRZ-3: Areas containing mineral deposits, the significance of which cannot be evaluated from available data.
- MRZ-4: Areas where available information is inadequate for assignment to any other MRZ zone.

Western San Diego County was classified into Mineral Resource Zones by the California Division of Mines and Geology in response to the Act in 1982. Plate 16 of the report entitled *Mineral Land Classification: Aggregate Materials in the Western San Diego County Production-Consumption Region* (California Division of Mines and Geology 1982) indicates that the portion of El Camino Real studied in this recirculated EIR, including the proposed wetlands mitigation site west of El Camino Real and south of the river, is within a large part of the lower San Dieguito River Valley that has been classified as MRZ-1. Therefore, mineral resources are not of concern in the study area.

3.8.3 Impacts

Issues to be addressed are the following:

Issue 1: How would the proposed project affect or be affected by geologic, seismic, and soils conditions (including contamination)?

Geologic hazards with the potential to impact the facilities proposed to be constructed for this project are ground shaking and liquefaction, including ground failures that can result from liquefaction. Unfavorable soil conditions could affect design and operation of the bridge, road, and other facilities associated with the project alternatives, including underground drainage facilities and retaining walls. Erosion is a concern for slopes of the elevated roadway and river banks. Erosion of the river bed (scour) can be a concern for bridge construction and foundation design, but in this case the bridge columns would consist of cast in drilled hole cylindrical piers set to the foundation depth of approximately 90 feet, so scour would not be an issue for the bridge columns.

The conditions that could create geologic hazards from fault rupture, landslides, and seiches do not occur within the project area. Interference with mineral resources use is not an impact of the project because no meaningful mineral deposits are present, and there is little likelihood for their presence.

The intensity and severity of potential geologic impacts are discussed below for each of the build alternatives. Conclusions of the significance of geology/seismicity/soils/contamination impacts under CEQA are discussed in Section 3.8.4.

3.8.3.1 Issue 1a: Impacts from Ground Shaking

The seismic hazard most likely to impact the site is ground shaking resulting from an earthquake on one of the active regional faults in the San Diego area. The most severe seismic event at the site would be a magnitude 7.2 earthquake on the Rose Canyon fault, which is the closest to the study area, at only 4.4 miles away. Based on the proximity to active and potentially active faults capable of producing large earthquakes, the study area has a high potential for experiencing strong ground motion.

The potential impacts of damage to project components from ground shaking for any of the alternatives would be direct and long-term. Measures for in-situ ground improvement would be incorporated into the project to avoid damage to facilities from ground shaking. The feasibility of protecting the bridge from ground shaking would be similar for all of the build alternatives. Cast-in-drilled-hole piers would be set deep enough, and would be designed and constructed to resist catastrophic damage from seismic forces, in accordance with recommendations in the geotechnical reports for the project. The ease of achieving protection from seismic forces would vary for the alternatives with road embankment slopes versus retaining walls, as discussed below.

Central Alignment, Western Alignment, Eastern Alignment, Roundabout, and Lower Elevation Alternatives. The severity and intensity of potential damage would be similar for these alternatives, because they all would raise the roadway on fill embankment that could be up to 12 feet high, with 2:1 side slopes. The length and height of the slopes for the Lower Elevation Alternative would be slightly less than for the other alternatives, since the bridge would be approximately 3 feet lower. The resistance of fill slope to failure from ground shaking is dependent on the geotechnical characteristics of the underlying soil. In the local area, nearsurface formations are subject to loss of mechanical support characteristics in an earthquake. For the extended length of embankment on each side of the raised roadway, it may be difficult to achieve assured protection from damage due to ground shaking, although geotextiles embedded within the slopes could help unify the structure of the embankments. However, in the event of an earthquake it is unlikely that the entire raised roadway would fail, because of the overall mass of the embankments, and if damage occurred, the roadway embankments would be relatively simple to repair. Recommendations in the geotechnical report for site preparation, fill placement and compaction, slope construction, and drainage installation would be incorporated into the project to reduce the potential for damage.

Road Capacity and Bicycle Safety Alternatives. The severity and intensity of potential damage would be similar for these alternatives, because they would raise the roadway on fill secured by vertical retaining walls that could be up to 12 feet high. The failure of the retaining walls could be more catastrophic than embankment slope failure, and more expensive and difficult to repair. However, various measures are feasible to provide a wall foundation and robust structure that would resist ground shaking. Cast-in-drilled-hole piers could be constructed through the formations that are likely to lose mechanical support characteristics, or the area for footings could be over-excavated and filled with acceptable material. Measures such as these would be incorporated into the project if one of these alternatives were selected.

3.8.3.2 Issue 1b: Impacts from Liquefaction

Due to the presence of a shallow groundwater table and relatively loose granular soils at the surface and in deeper sediments, the potential for liquefaction in the study area is considered to be high. Severe damage could occur to project facilities from dynamic settlement and lateral spread resulting from liquefaction during a seismic event. The potential impacts of damage to project

components would be direct and long-term. The potential for damage to the bridge and feasibility of protecting the bridge from liquefaction would be similar for all of the build alternatives. Castin-drilled-hole piers would be set deep enough, and would be designed and constructed to resist catastrophic damage from liquefaction, in accordance with recommendations in the geotechnical reports for the project. The ease of achieving protection from liquefaction would vary for the alternatives with road embankment slopes versus retaining walls, as discussed below.

Central Alignment, Western Alignment, Eastern Alignment, Roundabout, and Lower Elevation Alternatives. The severity and intensity of potential damage would be similar for these alternatives, because they all would raise the roadway on fill embankment that could be up to 12 feet high, with 2:1 side slopes. The length and height of the slopes for the Lower Elevation Alternative would be slightly less than for the other alternatives, since the bridge would be approximately 3 feet lower. As discussed above for damage from ground shaking, the resistance of fill slope to failure from liquefaction is dependent on the geotechnical characteristics of the underlying soil. The local near-surface and deeper formations are subject to loss of mechanical support characteristics in an earthquake. In the event of liquefaction along the length of the embankment slopes could be catastrophic. In-place ground improvement alternatives in the geotechnical report that would be evaluated by a specialty contractor and incorporated into the project include vibro-densification, vibro-replacement (stone columns), and deep dynamic compaction.

Road Capacity and Bicycle Safety Alternatives. The severity and intensity of potential damage from liquefaction would be similar for these alternatives, because they would raise the roadway on fill secured by vertical retaining walls that could be up to 12 feet high. Retaining walls set on piles would be more likely to resist damage from liquefaction than slopes. This type of design would be incorporated if one of these alternatives were selected.

3.8.3.3 Issue 1c: Impacts from Soils Conditions

The soil survey of San Diego County (SCS 1973) evaluated the shrink-swell behavior for different soil types throughout the county. The results for the soil types found in the project study area were summarized in Table 3.8-4. All of the soils identified in the project area were classified as having low shrink-swell behavior, except for Terrace Escarpments on the north side of Via de la Valle, where shrink-swell behavior was classified as variable. This soil condition is not expected to cause impacts to project facilities because the behavior is low for the soils that could be affected by construction. The Terrace Escarpments on the north side of Via de la Valle would remain outside of the construction zone for all of the build alternatives.

The project geotechnical study concluded soils would be corrosive to concrete and ferrous metals. This condition has the potential to severely affect underground pipelines added or relocated as part of the project, retaining walls, and bridge piers and foundations. The severity and intensity of potential impacts from the corrosive nature of onsite soils would be the same for the bridge component of each build alternative. Piers, footings, and the foundation for the bridge would all contain concrete and steel rebar, so would need protection. Typical design and construction measures would be incorporated into the project to preclude adverse impacts. Methods recommended in the geotechnical report that would be incorporated include using embankment materials with low corrosivity, using reinforced concrete pipe or plastic pipe, using Type II Modified Portland cement in concrete for structures along the alignment, and using a minimum cover of 3 inches of concrete on reinforcing.

3.8.3.4 Issue 1d: Impacts from Erosion

The soil survey of San Diego County (SCS 1973) evaluated the erodibility of different soil types throughout the county. The results for the soil types found in the project study area were summarized in Table 3.8-4. All of the soil types identified in the study area were classified as having severe erodibility. The potential impacts of damage to project components would be direct and long-term.

Design features that would protect the bridge components from erosion include the type of columns and the existing riprap blanket in the river. The bridge columns would consist of castin-drilled-hole piers that would be cylindrical shape down to the foundation depth of approximately 90 feet. Therefore, river scour would not be an issue for the bridge columns. The existing riprap blanket in the river would remain to protect the bridge foundation, and would be replaced where it may need to be temporarily removed during construction. Also, under the new bridge, both banks of the San Dieguito River would be steepened from 2:1 slopes to 1.5:1 slopes, and the new banks would be protected from erosion with riprap. The reinforcement could not be landscaped, as the slopes would be too steep for plant growth. Erosion that could occur in the river from flood flows is addressed in Section 3.7.

All slopes constructed for project facilities, including the raised roadway, driveway access to Horsepark and existing Polo Club fields, re-created open drainage ditches, and modified river banks could be subject to damage from erosion if not appropriately protected. Measures recommended in the geotechnical report that would be incorporated into the project to preclude adverse impacts include excavating keys at the toes of embankments 2 or more feet into competent fill or alluvium, compacting slope faces, and hydroseeding embankment slopes with drought-tolerant vegetation as soon as practicable after construction.

3.8.3.5 Issue 1e: Impacts from Hazardous Materials

Hazardous materials issues such as soils or groundwater contaminated by fuel could interfere with construction. A search of numerous hazardous materials databases did not identify any sites that are close to the proposed construction zone of any of the build alternatives except for the Roundabout Alternative. Most of the sites are facilities where the issue was internal to the buildings or did not involve violations, and none of the sites reflect ongoing contamination.

Relevant to the Roundabout Alternative, which would involve construction on El Camino Real North, is the site at 14905 El Camino Real, where soil contamination was noted as having occurred from diesel tank leakage due to corrosion in August 1995. This site is not determined to be of concern because the site is more than 600 feet north of the construction zone, the soil was removed and disposed of, and the case was closed in January 1997. Also relevant to the Roundabout Alternative, motor oil from a car spilled on the ground in February 1991 at 3790 Via de la Valle, 380 feet east of El Camino Real North and 142 feet north of Via de la Valle. This site is approximately 140 feet north of the construction zone for this alternative, which would extend eastward of the intersection. This site is not determined to be of concern because the site is well outside of the construction zone and the spill event was minor.

Relevant to all build alternatives is the fact that farming was previously conducted on the proposed mitigation site owned by the JPA. Therefore, excavation and vegetation planting activities involved in implementing the mitigation plan could expose construction workers to toxic substances such as pesticides and herbicides that may have been applied to the soil during previous agricultural uses. Typical worker safety and construction measures would be incorporated into the project to preclude adverse impacts. In addition, existing and recently enacted legislation serves to protect the public from any potential impacts from the use of

hazardous materials. This legislation includes the Clean Air Act, the Clean Water Act, the Comprehensive Environmental Response, Compensation and Liability Act, and the Toxic Substances Control Act.

3.8.3.6 No Build Alternative

Under the No Build Alternative, the bridge would not be replaced with a seismically designed structure. The risks of damage to the existing bridge from ground shaking, liquefaction, and abutment failure would remain. However, the No Build Alternative would not create a new drainage ditch or a raised roadway with engineered slopes that would need protection from erosion.

3.8.4 Significance of Geology/Seismicity/Soils Impacts under CEQA

3.8.4.1 CEQA Significance Thresholds

Based on the discussion of geologic and health and safety issues in the City of San Diego Significance Determination Thresholds (City of San Diego 2011), the following are considered to be the CEQA significance thresholds for impacts from geology/seismicity/soils and hazardous materials issues:

If the project would:

- 1. Expose people or structures to geologic hazards such as earthquakes, landslides, mudslides, ground failure, or similar hazards.
- 2. Result in a substantial increase in wind or water erosion of soils, either on or off the site.
- 3. 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.
- 4. 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, create a significant hazard to the public or environment.
- 5. Expose people to toxic substances, such as pesticides and herbicides, some of which have long-lasting ability, applied to the soil during previous agricultural uses.

The 2011 City thresholds note that typically, standard construction practices recommended in a geologic report would not be mitigation.

3.8.4.2 Determination of Significance under CEQA

The conclusions of significance under CEQA for the alternatives analyzed are summarized in Table 3.8-6. Impacts from the presence of hazards listed in thresholds 1 and 3 above depend on the presence or absence of conditions for such hazards. Impacts from the geologic hazards of fault rupture, landslides, and seiches, and interference with mineral resources were evaluated as not relevant because the conditions for such impacts do not occur in the project area. However, all build alternatives are in an area that is subject to relatively high ground shaking. Also, all build alternatives are located where the underlying formation and groundwater conditions could

lead to liquefaction in a seismic event. All adverse impacts from these conditions would be prevented by the incorporation of measures recommended in the geotechnical report, which may be supplemented in final design. The measures are accepted practices that would be incorporated as project features into the final design and implemented during project construction.

Regarding soil conditions in threshold 2 leading to significant geological impacts, none of the soils in the project area have moderate to high shrink-swell behavior, but soils at the project site have been determined to be corrosive. All of the soils on the project site have been classified as having severe erodibility (erosion potential). However, as for other geological hazards, all adverse impacts from these conditions would be prevented by the incorporation of measures recommended in the geotechnical report, which are accepted practices that would be incorporated as project features into the final design and implemented during project construction.

Regarding hazardous materials issues in thresholds 4 and 5 leading to significant health and safety impacts, none of the sites located in the project vicinity were determined to be of concern for any of the build alternatives. Typical worker safety and construction measures would be incorporated into the project to preclude adverse impacts from the potential presence of herbicides or pesticides due to historical farming on the proposed mitigation site owned by the JPA.

Therefore, impacts from the above geotechnical conditions are determined to be not significant for all build alternatives, and no additional measures are determined to be needed as mitigation measures.

Impact	Threshold	Central	Road	Bicycle	Western	Eastern	Round-	Lower	No
			Capacity	Safety			about	Elevation	Build
Ground	Damage is	NS	NS	NS	NS	NS	NS	NS	NS
Shaking,	possible to								
Liquefaction,	project								
Soil	components,								
Corrosion,	but								
Erosion,	measures to								
Contamination	preclude								
	adverse								
	impacts are								
	not								
	incorporated								
	into the								
	project								

 Table 3.8-6

 Summary of CEQA Significance for Geologic Impacts

NS = Not significant

SM = Significant and mitigable to below a level of significance

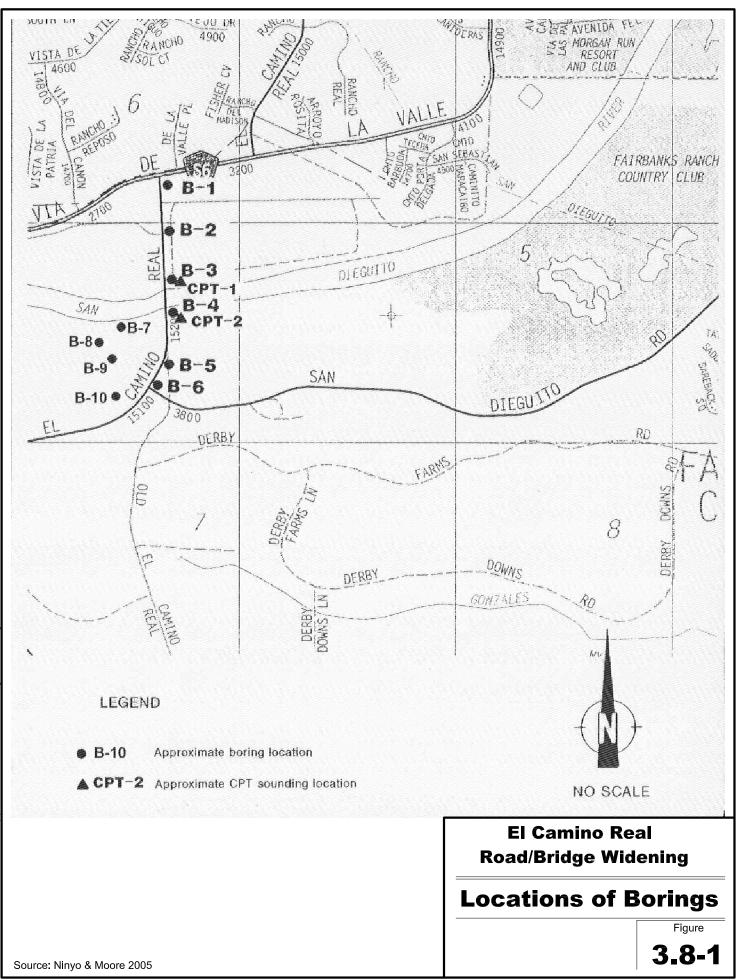
SU = Significant and unmitigable

3.8.5 Mitigation Measures

No impacts would be significant under CEQA. No mitigation measures are necessary for any of the build alternatives.

3.8.6 Significant and Unmitigable Impacts under CEQA

No unmitigable impacts would occur for the build alternatives. However, leaving the bridge in place for vehicular traffic would leave drivers on the bridge at risk if the bridge were damaged from shaking and/or liquefaction for the No Build Alternative.



3.9 PALEONTOLOGICAL RESOURCES

This section evaluates the impacts of the proposed project on paleontological resources in the study area. The paleontological resources (fossils) of an area consist of all of the remains and/or traces of prehistoric plant and animal life within the geologic formations, except for human remains. In this document, "fossils" refer to remains such as bones, teeth, shells, leaves, etc., which are found in the geologic formations in which they were originally buried. Fossils are found in the formational material (i.e., bedrock) that underlies the soil. Fossil remains, fossil sites, fossil-producing geologic formations, and geologic formations that have the potential for containing fossil remains are all considered to be resources/potential resources. Paleontological resources represent a scarce, non-renewable, and sensitive scientific and educational natural resource.

3.9.1 Regulatory Setting

No specific laws relate to this environmental issue. However, fossils are considered scarce nonrenewable natural resources and are subject to the same environmental review process as biological and cultural resources.

3.9.2 Affected Environment

3.9.2.1 Formations in the Study Area

As discussed in Section 3.8, the part of El Camino Real addressed in this recirculated EIR is mostly underlain by alluvium + slopewash. The geotechnical study for the project (Ninyo & Moore 2005, updated 2012), found that the geologic units present in the study area consisted of fill and alluvium.

Also as noted in Section 3.8, the geology map for the Del Mar Area (Cao et al. 2008) indicates that the northern end of the study area, portions of Via de la Valle, and the southern end of the study area at San Dieguito Road are underlain by Old Paralic Deposits (formerly designated the Bay Point Formation). This lagoonal and nonmarine sandstone is from the upper Pleistocene geologic era. The formation is described as being composed mostly of marine and nonmarine, poorly consolidated, fine- and medium-grained, pale brown, fossiliferous sandstone. According to <u>Paleontological Resources, County of San Diego</u> (Demere and Walsh 1994), this formation has produced large and diverse assemblages of well-preserved marine invertebrate fossils and rare vertebrate fossils.

3.9.2.2 Paleontological Resource Sensitivity

Alluvium is assigned a low sensitivity rating in the Paleontological Monitoring Determination Matrix in the City of San Diego Paleontological Guidelines (City of San Diego 2011). The Paleontological Guidelines note that there is no potential for impact when grading in artificial fill material. The deposits formerly designated as Bay Point Formation are assigned a high sensitivity rating in the Paleontological Monitoring Determination Matrix in the City of San Diego Paleontological Guidelines (City of San Diego 2011).

3.9.3 Impacts

Issues to be addressed are the following:

How would the proposed project affect paleontological resources?

The intensity and severity of potential impacts to paleontological resources are discussed below for the build alternatives. Conclusions of the significance of paleontological resources impacts under CEQA are discussed separately in Section 3.9.4.

3.9.3.1 Issue 1: Impacts to Fossils

All Alternatives. Impacts to fossils could occur during earthwork activities at the northern and southern ends of the project, such as removal of existing roadway and digging of trenches for widened drainage channels or relocated utilities. These kinds of operations could cut into geologic formations underlying the soil, and could disturb fossils, if present. The Paleontological Guidelines note that the kinds of projects that should trigger a paleontological review include road construction and replacement of pipelines at a lower depth than the original installation. These types of activities are relevant to the proposed project.

The formation that would be disturbed during project construction at the northern and southern ends of the project has the potential to contain fossils. However, the presence of fossils will remain unknown until excavation activities occur. All of the build alternatives involve the same general degree of excavation in the deposits formerly designated as Bay Point Formation at the northern and southern ends of the project. None of the action alternatives could avoid these areas completely. The intensity and severity of potential impacts to paleontological resources are considered to be high at the northern and southern ends of the project, and low in the river and along the rest of El Camino Real. The severity and intensity of potential damage to paleontological resources would be similar for any of the build alternatives. The impacts would be direct and short-term, as potential for damage to paleontological resources would only occur during project construction.

3.9.3.2 No Build Alternative

Under the No Build Alternative, none of the project components that could disturb potential fossil-bearing formations would be constructed. Impacts to paleontological resources would not occur.

3.9.4 Significance of Paleontological Resources Impacts under CEQA

3.9.4.1 CEQA Significance Thresholds

The CEQA Guidelines historically considered disruption of a paleontological site (except as part of a scientific study) to be a significant impact. The City of San Diego Significance Determination Thresholds (City of San Diego 2011) provide these guidance questions:

- 1. Would the project require over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit?
- 2. Would the project require over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit?

3.9.4.2 Determination of Significance under CEQA

The conclusions of significance under CEQA for the alternatives analyzed are summarized in Table 3.9-1. Impacts to paleontological resources during construction would be significant under CEQA for all build alternatives. The project would involve more than 1,000 cubic yards of excavation in a formation that has a high sensitivity rating in all communities where the formation occurs.

Table 3.9-1
Summary of CEQA Significance for Paleontological Resources Impacts

Impact	Threshold	Central	Road Capacity	Bicycle Safety	Western	Eastern	Round- about	Lower Elevation	No Build
Fossils	Disturbance of a formation with the potential to contain fossils	SM	SM	SM	SM	SM	SM	SM	NS

NS = Not significant

SM = Significant and mitigable to below a level of significance

SU = Significant and unmitigable

3.9.5 Mitigation Measures

Pal-1 The following measures shall be implemented to minimize paleontological resources impacts of any of the build alternatives:

The Applicant shall implement the procedures outlined below as a condition of approval.

I. Prior to Permit Issuance

- A. Entitlements Plan Check
 - 1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the ADD Environmental designee shall verify that the requirements for Paleontological Monitoring have been noted on the appropriate construction documents.
- B. Letters of Qualification have been submitted to ADD
 - 1. The applicant shall submit a letter of verification to MMC identifying the PI for the project and the names of all persons involved in the paleontological monitoring program, as defined in the City Paleontology Guidelines.
 - 2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the paleontological monitoring of the project.
 - 3. Prior to the start of work, the applicant shall obtain approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

- A. Verification of Records Search
 - 1. The PI shall provide verification to MMC that a site-specific records search has been completed. Verification includes, but is not limited to, a copy of a

confirmation letter from San Diego Natural History Museum, other institution or, if the search was in-house, a letter of verification from the PI stating that the search was completed.

- 2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.
- B. PI Shall Attend Precon Meetings
 - Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, CM and/or Grading Contractor, RE, BI, if appropriate, and MMC. The qualified paleontologist shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Paleontological Monitoring program with the CM and/or Grading Contractor.
 - a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM, or BI, if appropriate, prior to the start of any work that requires monitoring.
 - 2. Identify Areas to be Monitored
 - a. Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored, including the delineation of grading/excavation limits. The PME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).
 - 3. When Monitoring Will Occur
 - a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
 - b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as depth of excavation and/or site graded to bedrock, presence or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

- A. Monitor Shall be Present During Grading/Excavation/Trenching
 - 1. The monitor shall be present full time during grading/excavation/trenching activities as identified on the PME that could result in impacts to formations with high and moderate resource sensitivity. The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances, Occupational Safety and Health Administration safety requirements may necessitate modification of the PME.
 - 2. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition, such as trenching activities, does not encounter formational soils as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for resources to be present.
 - 3. The monitor shall document field activity via the CSVR. The CSVR's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.

- B. Discovery Notification Process
 - 1. In the event of a discovery, the Paleontological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.
 - 2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
 - 3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or e-mail with photos of the resource in context, if possible.
- C. Determination of Significance
 - 1. The PI shall evaluate the significance of the resource.
 - a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required. The determination of significance for fossil discoveries shall be at the discretion of the PI.
 - b. If the resource is significant, the PI shall submit a Paleontological Recovery Program and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.
 - c. If the resource is not significant (e.g., small pieces of broken common shell fragments or other scattered common fossils), the PI shall notify the RE, or BI as appropriate, that a non-significant discovery has been made. The paleontologist shall continue to monitor the area without notification to MMC unless a significant resource is encountered.
 - d. The PI shall submit a letter to MMC indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.

IV. Night and/or Weekend Work

- A. If night and/or weekend work is included in the contract:
 - 1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the Preconstruction Meeting.
 - 2. The following procedures shall be followed.
 - a. No Discoveries

In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSVR and submit to MMC via fax by 8 A.M. on the next business day.

- b. Discoveries All discoveries shall be processed and documented using the existing procedures detailed in Section III - During Construction.
- Potentially Significant Discoveries If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed.
- d. The PI shall immediately contact MMC, or by 8 A.M. on the next business day, to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.
- B. If night work becomes necessary during the course of construction:
 - 1. The CM shall notify the RE, or BI as appropriate, a minimum of 24 hours before the work is to begin.
 - 2. The RE or BI, as appropriate, shall notify MMC immediately.
- C. All other procedures described above shall apply, as appropriate.

V. Post Construction

- A. Preparation and Submittal of Draft Monitoring Report
 - 1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Paleontological Guidelines which describes the results, analysis, and conclusions of all phases of the Paleontological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring.
 - a. For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program shall be included in the Draft Monitoring Report.
 - b. Recording Sites with the San Diego Natural History Museum The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources encountered during the Paleontological Monitoring Program in accordance with the City's Paleontological Guidelines, and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report.
 - 2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
 - 3. The PI shall submit revised Draft Monitoring Report to MMC for approval.
 - 4. MMC shall provide written verification to the PI of the approved report.
 - 5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.
- B. Handling of Fossil Remains
 - 1. The PI shall be responsible for ensuring that all fossil remains collected are cleaned and cataloged.
 - 2. The PI shall be responsible for ensuring that all fossil remains are analyzed to identify function and chronology as they relate to the geologic history of the area, that faunal material is identified as to species, and that specialty studies are completed, as appropriate.
- C. Curation of Fossil Remains: Deed of Gift and Acceptance Verification
 - 1. The PI shall be responsible for ensuring that all fossil remains associated with the monitoring for this project are permanently curated with an appropriate institution.
 - 2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.
- D. Final Monitoring Report(s)
 - 1. The PI shall submit two copies of the Final Monitoring Report to MMC (even if negative) within 90 days after notification from MMC that the Draft Monitoring Report has been approved.
 - 2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

3.9.6 Significant and Unmitigable Impacts under CEQA

Implementation of the above measures would mitigate all CEQA impacts to below a level of significance. No unmitigable impacts would occur.

3.10 AIR QUALITY

This section evaluates the air quality impacts of the proposed project. This section is based on the *Air Quality Analysis for the El Camino Real Road/Bridge Widening Project* (RECON 2014). This separate report is incorporated into this EIR by reference, and is available for inspection at the City.

3.10.1 Regulatory Setting and Methodology

Motor vehicles are San Diego County's leading source of air pollution and the largest contributor to greenhouse gases (County of San Diego 2008). In addition to these sources, other mobile sources include construction equipment, trains, and airplanes. Emission standards for mobile sources are established by state and federal agencies such as the California Air Resources Board (CARB) and the California Environmental Protection Agency (EPA). The regulatory framework described below details the federal and state agencies that are in charge of monitoring and controlling mobile source air pollutants and the measures currently being taken to achieve and maintain healthful air quality in the San Diego Air Basin (SDAB).

In addition to mobile sources, stationary sources also contribute to air pollution in the SDAB. Stationary sources include gasoline stations, power plants, dry cleaners, and other commercial and industrial uses. Stationary sources of air pollution are regulated by the local air pollution control or management district, in this case the San Diego Air Pollution Control District (SDAPCD).

3.10.1.1 Federal Standards

The Clean Air Act (42 U.S.C. §§ 7401-7671q) requires the adoption of national ambient air quality standards (NAAQS) to protect the public health and welfare from the effects of air pollution. The NAAQS have been updated as needed. Current federal standards are shown in Table 3.10-1.

Six pollutants of primary concern have been designated: ozone (O₃), carbon monoxide (CO), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), lead (Pb), and respirable particulate matter [particulate matter less than 10 microns (PM₁₀), and particulate matter less than 2.5 microns (PM_{2.5})]. The primary NAAQS "... in the judgment of the Administrator, based on such criteria and allowing an adequate margin of safety, are requisite to protect the public health ..." and the secondary standards "... protect the public welfare from any known or anticipated adverse effects associated with the presence of such air pollutant in the ambient air" (42 U.S.C. 7409(b)(2)). The primary standards were established, with a margin of safety, considering long-term exposure for the most sensitive groups in the general population (i.e., children, senior citizens, and people with breathing difficulties).

3.10.1.2 Conformity of Federal Actions

Section 176(c) of the Clean Air Act requires

No department, agency, or instrumentality of the Federal Government shall engage in, support in any way or provide financial assistance for, license or permit, or approve, any activity which does not conform to an implementation plan after it has been approved . . .

Conformity to an implementation plan means

(A) conformity to an implementation plan's purpose of eliminating or reducing the severity and number of violations of the national ambient air quality standards and achieving expeditious attainment of such standards; and

- (B) that such activities will not
 - (i) cause or contribute to any new violation of any standard in any area;
 - (ii) increase the frequency or severity of any existing violation of any standard in any area; or
 - (iii) delay timely attainment of any standard or any required interim emission reductions or other milestones in any area.

The determination of conformity shall be based on the most recent estimates of emissions, and such estimates shall be determined from the most recent population, employment, travel and congestion estimates as determined by the metropolitan planning organization or other agency authorized to make such estimates.

In November, 1993, the U.S. Department of Transportation (DOT) and EPA developed guidance for determining conformity of transportation plans, programs, and projects. This guidance is denoted as the Transportation Conformity Rule (40 C.F.R. §§ 51.390-464 and 40 C.F.R. §§ 93.100-136).

The metropolitan planning organization responsible for the preparation of regional transportation plans and the associated air quality analyses is SANDAG. The regional plans are the RTP and the RTIP. The 2006 Draft EIR stated that the proposed project was included in the 2030 RTP (SANDAG 2003a) and the 2004 RTIP, Amendment 12 (SANDAG 2005). The air quality analysis and conformity finding for the 2030 RTP was prepared by SANDAG (SANDAG 2003b), and the conformity finding was approved by the FHWA and Federal Transit Administration on April 9, 2003 (DOT 2003). The air quality conformity determination for the 2004 RTIP Amendment No. 12 was approved by the DOT on December 19, 2005 (FHWA 2005). The proposed project is currently a phased arterial project considered in the 2050 RTP (SANDAG 2011). The design of the project is similar to that anticipated in the RTP and the RTIP.

3.10.1.3 State Standards

The California Clean Air Act requires that districts assess their progress triennially and report to CARB as part of the triennial plan revisions. The CARB is part of the California EPA, and is the state agency responsible for protecting public health and the environment from the harmful effects of air pollution. CARB has established standards for the criteria pollutants that are generally more restrictive than the NAAQS, and has also established standards for other pollutants. California ambient air quality standards are shown in Table 3.10-1. The CARB works with the regional districts to develop the state implementation plan (SIP), which is required for regions that do not attain the NAAQS, to demonstrate how the standards for visibility reducing particles, sulfates, hydrogen sulfide, and vinyl chloride (see Table 3.10-1). The SDAB is a nonattainment area for the state ozone standards, the state PM₁₀ standard, and the state PM_{2.5} standard. It is in attainment of the state's standards for all of the other criteria air pollutants (CARB 2013).

Other state regulations include the California Air Toxics Program, which establishes the process for the identification and control of toxic air contaminants and includes provisions to make the public aware of significant toxic exposures and for reducing risk. In addition, the Air Toxics "Hot Spots" Information and Assessment Act (AB 2588, 1987, Connelly) was enacted in 1987 and requires stationary sources to report the types and quantities of certain substances routinely released into the air. The SDAPCD implements rules and regulations for the control of toxic air contaminants through mandatory permitting of stationary and portable major emitters of air pollutants.

Pollutant	Averaging		Standards ¹		Federal Standards ²				
ronutant	Time	Concentration ³	Method ⁴	Primary ^{3,5}	Secondary ^{3,6}	Method ⁷			
0.0000	1 Hour	0.09 ppm (180 μg/m ³)	Ultraviolet	_	Same as	Ultraviolet Photometry			
Ozone	8 Hour	0.07 ppm (137 μg/m ³)	Photometry	0.075 ppm (147 μg/m ³)	Primary Standard				
Respirable	24 Hour	$50 \mu g/m^3$	Construction of	$150 \mu g/m^3$	S	In a stick Compared in			
Particulate Matter (PM ₁₀)	Annual Arithmetic Mean	$20 \ \mu g/m^3$	Gravimetric or Beta Attenuation	-	Same as Primary Standard	Inertial Separatior and Gravimetric Analysis			
Fine	24 Hour	No Separate S	State Standard	$35 \ \mu g/m^3$	Same as	Inertial Separation			
Particulate Matter (PM _{2.5})	Annual Arithmetic Mean	$12 \mu g/m^3$	Gravimetric or Beta Attenuation	ravimetric or Beta 15 μg/m ³		and Gravimetric Analysis			
	1 Hour	20 ppm (23 mg/m ³)		35 ppm (40 mg/m ³)	_				
Carbon Monoxide	8 Hour	9.0 ppm (10 mg/m ³)	Non-dispersive Infrared	9 ppm (10 mg/m ³)	_	Non-dispersive Infrared			
(CO)	8 Hour (Lake Tahoe)	6 ppm (7 mg/m ³)	Photometry	_	_	Photometry			
Nitrogen Dioxide (NO ₂) ⁸	1 Hour	0.18 ppm (339 μg/m ³)	Gas Phase	100 ppb (188 μg/m ³)	_	Gas Phase Chemi-			
	Annual Arithmetic Mean	0.030 ppm (57 μg/m ³)	Chemi- luminescence	53 ppb (100 µg/m ³)	Same as Primary Standard	luminescence			
	1 Hour	0.25 ppm (655 μg/m ³)		75 ppb (196 μg/m ³)	-				
Sulfur	3 Hour	-		-	0.5 ppm (1300 µg/m ³)	Ultraviolet Fluorescence;			
Dioxide $(SO_2)^9$	24 Hour	0.04 ppm (105 µg/m ³)	Ultraviolet Fluorescence	0.14 ppm (for certain areas) ⁹	_	Spectro photometry (Pararosaniline			
	Annual Arithmetic Mean	_		0.030 ppm (for certain areas) ⁹	_	Method)			
	30 Day Average	$1.5 \ \mu g/m^3$		_	_				
Lead ^{10,11}	Calendar Quarter	_	Atomic Absorption	1.5 µg/m ³ (for certain areas) ¹¹	Same as Primary	High Volume Sampler and Atomic Absorption			
	Rolling 3-Month Average	_		$0.15 \ \mu g/m^3$	Standard	Atomic Absorption			
Visibility Reducing Particles ¹²	8 Hour	See footnote ¹²	Beta Attenuation and Transmittance through Filter Tape						
Sulfates	24 Hour	$25 \mu g/m^3$	Ion Chroma- tography		No Federal Standards				
Hydrogen Sulfide	1 Hour	$0.03 \text{ ppm} (42 \ \mu \text{g/m}^3)$	Ultraviolet Fluorescence						
Vinyl Chloride ¹⁰	24 Hour	0.01 ppm (26 μg/m ³)	Gas Chroma- tography						

Table 3.10-1Ambient Air Quality Standards

Source: CARB 2013

Footnotes for Table 3.10-1

ppm = parts per million; ppb = parts per billion; $\mu g/m^3$ = micrograms per cubic meter; – = not applicable.

- ¹California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, particulate matter (PM₁₀, PM_{2.5}, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
- ²National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM₁₀, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 μ g/m³ is equal to or less than one. For PM_{2.5}, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.
- ³Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.
- ⁴Any equivalent measurement method which can be shown to the satisfaction of the Air Resources Board to give equivalent results at or near the level of the air quality standard may be used.
- ⁵National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.
- ⁶National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.
- ⁷Reference method as described by the U.S. EPA. An "equivalent method" of measurement may be used but must have a "consistent relationship to the reference method" and must be approved by the U.S. EPA.
- ⁸To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national standards are in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national standards to the California standards the units can be converted from ppb to ppm. In this case, the national standards of 53 ppb and 100 ppb are identical to 0.053 ppm and 0.100 ppm, respectively.
- 9 On June 2, 2010, a new 1-hour SO₂ standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1-hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO₂ national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.
- Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.
- ¹⁰The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.
- ¹¹The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard ($1.5 \mu g/m^3$ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
- ¹²In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

3.10.1.4 Regional Authority

The SDAPCD is the agency that regulates air quality in the SDAB. The SDAPCD prepared the 1991/1992 Regional Air Quality Strategy (RAQS) in response to the requirements set forth in AB 2595. Attached as part of the RAQS are the Transportation Control Measures (TCMs) for the air quality plan prepared by SANDAG in accordance with AB 2595 and adopted by SANDAG on March 27, 1992, as Resolution Number 92-49 and Addendum (SANDAG 2009). The RAQS and TCM set forth the steps needed to accomplish attainment of state ambient air quality standards. The required triennial updates of the RAQS and corresponding TCM were adopted in 1995, 1998, 2001, 2004, and 2009.

The SDAPCD has also established a set of rules and regulations initially adopted on January 1, 1969, and periodically reviewed and updated. These rules and regulations are available for review on the agency's web site.

3.10.2 Affected Environment

3.10.2.1 Meteorology/Climate

The project is located about 2.5 miles east of the Pacific Ocean and, like the rest of San Diego County's coastal areas, has a Mediterranean climate characterized by warm, dry summers and mild, wet winters. The mean annual temperature for the project area is 63 degrees Fahrenheit (°F). The average annual precipitation is 10 inches, falling primarily from November to April. Winter low temperatures in the project area average about 49°F, and summer high temperatures average about 74°F. The average relative humidity is 69 percent and is based on the yearly average humidity at Lindbergh Field (Western Regional Climate Center 2011).

The dominant meteorological feature affecting the region is the Pacific High Pressure Zone, which produces the prevailing westerly to northwesterly winds. These winds tend to blow pollutants away from the coast toward the inland areas. Consequently, air quality near the coast is generally better than that which occurs at the base of the coastal mountain range.

Fluctuations in the strength and pattern of winds from the Pacific High Pressure Zone interacting with the daily local cycle produce periodic temperature inversions that influence the dispersal or containment of air pollutants in the SDAB. Beneath the inversion layer pollutants become "trapped" as their ability to disperse diminishes. The mixing depth is the area under the inversion layer. Generally, the morning inversion layer is lower than the afternoon inversion layer. The greater the change between the morning and afternoon mixing depths, the greater the ability of the atmosphere to disperse pollutants.

Throughout the year, the height of the temperature inversion in the afternoon varies between approximately 1,500 and 2,500 feet above mean sea level (msl). In winter, the morning inversion layer is about 800 feet above msl. In summer, the morning inversion layer is about 1,100 feet above msl. Therefore, air quality generally tends to be better in the winter than in the summer.

The prevailing westerly wind pattern is sometimes interrupted by regional "Santa Ana" conditions. A Santa Ana occurs when a strong high pressure develops over the Nevada–Utah area and overcomes the prevailing westerly coastal winds, sending strong, steady, hot, dry northeasterly winds over the mountains and out to sea. Strong Santa Anas tend to blow pollutants out over the ocean, producing clear days. However, at the onset or during breakdown of these conditions or if the Santa Ana is weak, local air quality may be adversely affected. In these cases, emissions from the South Coast Air Basin to the north are blown out over the ocean, and low pressure over Baja California draws this pollutant-laden air mass southward. As the high pressure weakens, prevailing northwesterly winds reassert themselves and send this cloud of contamination ashore in the SDAB. When this event does occur, the combination of transported and locally produced contaminants produce the worst air quality measurements recorded in the basin.

3.10.2.2 Ambient Air Quality

Air quality at a particular location is a function of the kinds, amounts, and dispersal rates of pollutants being emitted into the air locally and throughout the basin. The major factors affecting pollutant dispersion are wind speed and direction, the vertical dispersion of pollutants (which is affected by inversions), and the local topography.

Air Quality Monitoring. Air quality is commonly expressed as the number of days in which air pollution levels exceed state standards set by the CARB or federal standards set by the EPA (State of California 2014). The SDAPCD maintains 10 air-quality monitoring stations located throughout the greater San Diego metropolitan region. Air pollutant concentrations and meteorological information are continuously recorded at these 10 stations. Measurements are then used by scientists to help forecast daily air pollution levels. Table 3.10-2 summarizes the number of days per year during which state and federal standards were exceeded in the SDAB overall during the years 2007 to 2011.

The Del Mar–Mira Costa College monitoring station, located 2.4 miles southwest of the project area, the San Diego–Overland monitoring station, located 11.2 miles southeast of the project area, and the San Diego–Union Street monitoring station, located 18.2 miles south of the project area, are the coastal monitoring stations nearest to the project area. The Del Mar–Mira Costa College monitoring station only measures ozone. The San Diego–Overland monitoring station measures ozone, NO₂, PM₁₀, and PM_{2.5}. The San Diego–Union Street monitoring station is the nearest coastal monitoring station that measured CO (CO measurements stopped after 2008). Table 3.10-3 provides a summary of measurements of ozone, CO, NO₂, PM₁₀, and PM_{2.5} collected at the Del Mar–Mira Costa College, San Diego–Overland, and San Diego–Union Street monitoring stations from 2009–2013.

Designations for Ozone. Nitrogen oxides and hydrocarbons (reactive organic gases, or ROG) are known as the chief "precursors" of ozone. These compounds react in the presence of sunlight to produce O_3 , which is the primary air pollution problem in the SDAB. During the past 20 years, San Diego had experienced a decline in the number of days with unhealthy levels of O_3 despite the region's growth in population and vehicle miles traveled (County of San Diego 2009).

The SDAB is currently designated a federal and state non-attainment area for ozone.

Designation for Particulates. The SDAB is designated as federal unclassified and state nonattainment for PM_{10} . The SDAB was classified as an attainment area for the previous federal 24-hour $PM_{2.5}$ standard of 65 micrograms per cubic meter of air (μ g/m³) and has also been classified as an attainment area for the revised federal 24-hour $PM_{2.5}$ standard of 35 μ g/m³ (U.S. EPA 2004, 2009b). The SDAB is a nonattainment area for the state $PM_{2.5}$ standard (CARB 2005).

Designations for Sulfur Dioxide. The SDAB is an attainment area for the old federal SO_2 standards. New standards for SO_2 have been adopted, and new designations for the SDAB will be determined in the future. The SDAB is in attainment of the State standards for this air pollutant.

Designations for Nitrogen Dioxide. All areas of the state, including the SDAB, are either unclassified or in attainment of the previous NO_2 standards. New standards for NO_2 have been adopted, and new designations for the SDAB will be determined in the future. The SDAB is in attainment of the State standards for this air pollutant.

TABLE 3.10-2 AMBIENT AIR QUALITY SUMMARY – SAN DIEGO AIR BASIN

		California		National																
	Average	Ambient Air Quality	Attainment	Ambient Air Quality	Attainment		Max	imum Concent	ration			Number of Da	avs Exceeding	State Standard		N	Number of Days	s Exceeding N	ational Standar	rd
Pollutant	Time	Standards ^a	Status	Standards ^b	Status ^c	2007	2008	2009	2010	2011	2007	2008	2009	2010	2011	2007	2008	2009	2010	2011
O ₃	1 hour	0.09 ppm	Ν	N/A	N/A	0.134	0.139	0.119	0.107	0.114	21	18	8	7	5	1	2	0	0	0
O ₃	8 hours	0.07ppm	Ν	0.075 ppm	N	0.092	0.110	0.098	0.088	0.093	50	69	47	21	33	27	35	24	14	10
СО	1 hour	20 ppm	А	35 ppm	А	Na	Na	Na	Na	Na	Na	Na	Na	Na	Na	Na	Na	Na	Na	Na
CO	8 hours	9 ppm	А	9 ppm	А	5.18	3.51	3.24	2.46	2.44	0	0	0	0	0	0	0	0	0	0
NO_2	1 hour	0.18 ppm	А	0.100 ppm ^d	А	0.101	0.123	0.091	0.091	0.100	0	0	0	0	0					
NO_2	Annual	0.030 ppm	А	0.053 ppm	А	0.015	0.015	0.016	0.013	0.013	NX	NX	NX	NX	NX	NX	NX	NX	NX	NX
SO_2	1 hour	0.25 ppm	А	0.075 ppm	А	Na	Na	Na	Na	Na	Na	Na	Na	Na	Na	Na	Na	Na	Na	Na
SO_2	3 hours	N/A	N/A	N/A	N/A	Na	Na	Na	Na	Na										
SO_2	24 hours	0.04 ppm	А	N/A	N/A	Na	Na	Na	Na	Na	Na	Na	Na	Na	Na					
PM_{10}	24 hours	$50 \ \mu g/m^3$	Ν	$150 \ \mu g/m^3$	U	392.0	158.0	126.0	108.0	101.0	27/158.6*	30/163.4*	25/146.4*	22/136.0*	13/Na*	1/6.1*	1/6.1*	0/0.0*	0/0.0*	0/Na*
PM_{10}	Annual	$20 \ \mu g/m^3$	Ν	N/A	N/A	58.4	56.1	53.9	47.0	Na	EX	EX	EX	EX	Na					
PM _{2.5}	24 hours	N/A	N/A	35 µg/m ³	А	151.0	44.0	78.4	52.2	67.7						11.4	3.5	3.4	2.0	1.0
PM _{2.5}	Annual	$12 \ \mu g/m^3$	Ν	$15 \mu\text{g/m}^3$	А	13.3	14.9	12.2	10.8	Na	EX	EX	EX	EX	Na	NX	NX	NX	NX	NX

SOURCE: State of California 2012b. California Air Quality Data Statistics. California Air Resources Board Internet Site. URL http://www.arb.ca.gov/adam/welcome.html. *Measured Days/Calculated Days - Calculated days are the estimated number of days that a measurement would have been greater than the level of the standard had measurements been collected every day. The number of days above the standard is not necessarily the number of violations of the standard for the year. Data to determine federal calculated days were not available. *California standards for ozone, carbon monoxide (except at Lake Tahoe), sulfur dioxide (1-hour and 24-hour), nitrogen dioxide, and PM₁₀ are values that are not to be exceeded. Some measurements gathered for pollutants with air quality standards that are based upon 1-hour, 8-hour, or 24-hour averages, may be excluded if the CARB determines they would occur less than once per year on average. *National standards other than for ozone and particulates, and those based on annual averages or annual arithmetic means are not to be exceeded more than once a year. The 1-hour ozone standard is attained if, during the most recent 3-year period, the average number of days per year with maximum hourly concentrations above the standard is equal to or less than one. *A = attainment; N = non-attainment; U = Unclassifiable; N/A = not applicable; NA = annual average not exceeded; EX = annual average exceeded. *Effective January 22, 2010. Not applicable to monitoring from 2005 through 2009.

ppm = parts per million, $\mu g/m^3$ = micrograms per cubic meter.

Pollutant/Standard	2007	2008	2009	2010	2011
DEL MAR—MIRA COSTA COLLEGE					
Ozone					
Days State 1-hour Standard Exceeded (0.09 ppm)	1	2	1	0	0
Days State 8-hour Standard Exceeded (0.07 ppm)	4	11	3	2	1
Days Federal 1-hour Standard Exceeded (0.12 ppm)	0	0	0	0	0
Days '08 Federal 8-hour Standard Exceeded (0.075 ppm)	3	3	1	0	0
Max. 1-hr (ppm)	0.110	0.117	0.097	0.085	0.091
Max 8-hr (ppm)	0.079	0.079	0.084	0.072	0.075
SAN DIEGO—OVERLAND AVENUE					
Ozone					
Days State 1-hour Standard Exceeded (0.09 ppm)	0	4	2	2	1
Days State 8-hour Standard Exceeded (0.07 ppm)	5	12	3	3	3
Days Federal 1-hour Standard Exceeded (0.12 ppm)	0	0	0	0	0
Days '08 Federal 8-hour Standard Exceeded (0.075 ppm)	2	5	1	0	1
Max. 1-hr (ppm)	0.088	0.100	0.105	0.100	0.097
Max 8-hr (ppm)	0.076	0.093	0.082	0.074	0.087
Nitrogen Dioxide					
Days State 1-hour Standard Exceeded (0.18 ppm)	0	0	0	0	0
Max 1-hr (ppm)	0.087	0.077	0.060	0.073	0.073
Annual Average (ppm)	0.015	0.014	0.014	0.013	0.012
PM ₁₀ *					
Measured Days State 24-hour Standard Exceeded (50 μ g/m ³)	1	0	0	0	0
Calculated Days State 24-hour Standard Exceeded (50 µg/m ³)	6.1	0	0	0	Na
Measured Days Federal 24-hour Standard Exceeded (150 µg/m ³)	0	0	0	0	0
Calculated Days Federal 24-hour Standard Exceeded (150 µg/m ³)	0	0	0	0	Na
Max. Daily $(\mu g/m^3)$	65.0	41.0	50.0	33.0	47.0
State Annual Average ($\mu g/m^3$)	23.6	23.8	24.9	18.7	Na
Federal Annual Average ($\mu g/m^3$)	23.2	23.5	24.7	18.6	20.5
PM _{2.5} *					
Measured Days '97 Federal 24-hour Standard Exceeded (65 µg/m ³)	0	0	0	0	0
Calculated Days '97 Federal 24-hour Standard Exceeded $(65 \mu\text{g/m}^3)$	Na	Na	0	0	Na
Measured Days '06 Federal 24-hour Standard Exceeded (35 μ g/m ³)	0	0	0	0	0
Calculated Days '06 Federal 24-hour Standard Exceeded $(35 \mu\text{g/m}^3)$	Na	Na	0	0	Na
Max. Daily ($\mu g/m^3$)	30.6	27.2	25.1	18.7	18.3
State Annual Average ($\mu g/m^3$)	Na	Na	10.5	8.7	Na
Federal Annual Average $(\mu g/m^3)$	Na	Na	10.5	8.7	Na
SAN DIEGO—UNION STREET					
Carbon Monoxide					
Days State 1-hour Standard Exceeded (20 ppm)	0	0	Na	Na	Na
Days State 8-hour Standard Exceeded (9 ppm)	0	0 0	Na	Na	Na
Days Federal 1-hour Standard Exceeded (35 ppm)	0	0 0	Na	Na	Na
Days Federal 8-hour Standard Exceeded (9 ppm)	0	0 0	Na	Na	Na
Max. 1-hr (ppm)	8.7	7.7	Na	Na	Na
Max. 8-hr (ppm)	5.18	2.24	Na	Na	Na

 Table 3.10-3

 Summary of Recorded Air Quality Measurements

Source: CARB 2013. Na = Not available.

*Calculated days value. Calculated days are the estimated number of days that a measurement would have been greater than the level of the standard had measurements been collected every day. The number of days above the standard is not necessarily the number of violations of the standard for the year.

[†]Stopped monitoring CO after 2008.

Designations for Lead. The SDAB was designated "unclassifiable/attainment" for the federal lead standard. New standards for lead have been adopted, and new designations for the SDAB will be determined in the future. The SDAB is in attainment of the State standards for this air pollutant.

Designations for Carbon Monoxide. The SDAB is a federal maintenance area for CO, and is in attainment of the state standards for this air pollutant. Small-scale, localized concentrations of CO above the state and national standards have the potential to occur at intersections with stagnation points such as those that occur on major highways and heavily traveled and congested roadways. Localized high concentrations of CO are referred to as "CO hot spots" and are a concern at congested intersections, where automobile engines burn fuel less efficiently and their exhaust contains more CO.

Designations for Other State Criteria Pollutants. The SDAB is in attainment of the State standards for hydrogen sulfide, sulfates, vinyl chloride, and visibility reducing particles.

3.10.3 Impacts

Issues to be addressed are the following:

Issue 1: Would the proposed project affect the ability of the San Diego region to meet federal, state, and local air quality regulations?

3.10.3.1 Issue 1a: Impacts from Construction

Construction-related activities are temporary, short-term sources of air emissions. Sources of construction-related air emissions include:

- Fugitive dust from grading activities;
- Construction equipment exhaust;
- Construction-related trips by workers, delivery trucks, and material-hauling trucks; and
- Construction-related power consumption.

Fugitive dust emissions vary greatly during construction and are dependent on the amount and type of activity, silt content of the soil, and the weather. Vehicles moving over paved and unpaved surfaces, demolition, excavation, earth movement, grading, and wind erosion from exposed surfaces are all sources of fugitive dust. Construction operations are subject to the requirements established in Regulation 4, Rules 52, 54, and 55, of the SDAPCD's rules and regulations.

Construction Assumptions. Heavy-duty construction equipment is usually diesel powered. In general, emissions from diesel-powered equipment contain more nitrogen oxides, sulfur oxides, and particulate matter than gasoline-powered engines. However, diesel-powered engines generally produce less carbon monoxide and less reactive organic gases (ROG) than do gasoline-powered engines. Standard construction equipment includes dozers, rollers, scrapers, dewatering pumps, backhoes, loaders, paving equipment, delivery/haul trucks, jacking equipment, welding machines, pile drivers, and so on.

Regardless of the alternative, the Project would take approximately 18 months to complete but is scheduled for a 2.5- to 3.5-year overall construction duration, as construction in and near sensitive areas is limited during the breeding season. Construction is anticipated to occur eight hours per day, Monday through Friday.

The construction schedule was evaluated to identify the period with the most overlapping activities as this represents the worst case for daily air emissions. Based on the schedule, the greatest potential for overlap

would occur during the grading of the mitigation site and the grading of the west side of El Camino Real with the associated bridge work.

Construction equipment air emissions are anticipated to improve over time due to regulatory requirements affecting engine efficiency and fuel formulations. Thus in order to estimate the worst-case daily emissions and since the exact timing of construction is unknown, all construction activities were assumed to occur in the year 2015. This is conservative, as it compresses all activities to a single year and does not take into account any equipment improvements over the subsequent years. For air quality assessment purposes, the alternatives were consolidated into two scenarios since the construction equipment and schedules were similar for various alternatives. Scenario 1 includes the Central Alignment, Western Alignment, and the Lower Elevation alternatives, which are all considered to have similar construction schedules and requirements. Scenario 2 includes the Eastern Alignment and the Roundabout Alternative, which have similar construction schedules and construction requirements.

Total demolition associated with the roadway bed and existing bridge is estimated to result in approximately 4,380 cubic yards¹ of demolition debris. At an average of 20 cubic yard per truck load, approximately 219 truck trips would be required to haul away this material. For purposes of calculating emissions, it is estimated that it would require a maximum of 15 two-way truck trips per day with an average travel distance of 30 miles per a round trip.

For modeling purposes, the total area to be disturbed was estimated to be 24 acres during the grading of the mitigation site and roadway. As a conservative estimate, modeling included disturbance of the entire 24 acres daily. Additionally, as a worst-case analysis, each scenario was assumed to have a total net export/import of 51,600 cubic yards of fill and road base.

This analysis assumes that standard dust and emission control during grading operations would be implemented to reduce potential nuisance impacts and to ensure compliance with SDAPCD rules and regulations. It was assumed watering would take place two times per day. Additionally, all construction equipment was assumed to be compliant with state in-use off-road equipment regulations and was modeled as Tier II equipment. Tier II standards are met through advanced engine design and have been required for new off-road equipment over 50 horse power since 2008.

The following standard fugitive dust control measures required as part of grading are considered part of the project design and were taken into account for calculating construction emissions:

- 1. All unpaved construction areas shall be watered, or other acceptable SDAPCD dust control agents may be applied, two times per day to reduce dust emissions. Additional watering or acceptable SDAPCD dust control agents shall be applied during dry weather or windy days until dust emissions are not visible.
- 2. A 15-mile-per-hour speed limit on unpaved surfaces shall be enforced.
- 3. When visible, dirt and debris spilled onto paved surfaces shall be swept up immediately to reduce resuspension of particulate matter caused by vehicle movement. Approach routes to construction sites shall be cleaned daily of construction-related dirt.
- 4. Disturbed areas shall be hydroseeded, landscaped, or developed as quickly as possible and as directed by the City of San Diego and/or SDAPCD to reduce dust generation.

Thresholds for Evaluating Construction Air Quality Impacts. The SDAPCD does not provide specific numeric thresholds for determining the significance of air quality impacts under CEQA.

¹ This estimate is based the 2,400 foot length of the project, a paved surface width of 23 feet, an average roadway bed depth of 2 feet, and a bridge deck of approximately 3 feet thick.

However, the district does specify Air Quality Impact Analysis trigger levels for new or modified stationary sources (SDAPCD Rules 20.2 and 20.3). Although these trigger levels do not generally apply to mobile sources or general land development projects, for comparative purposes these levels are used to evaluate the increased emissions that would be discharged to the SDAB if the proposed project were approved.

The SDAPCD thresholds are also utilized by the City of San Diego in their Significance Determination Thresholds (City of San Diego 2011) as one of the considerations when determining the potential significance of air quality impacts for projects within the city. However, SDAPCD Rules 20.2 and 20.3 do not specify thresholds for ROG or PM_{2.5}. The threshold for ROGs is based on the Environmental Protection Agency General Conformity Rule, which equates ROG and nitrogen oxide (NO_X) emissions under the Clean Air Act and applies the same limitation on ROG and NO_X emissions in ozone nonattainment areas (Federal Register 2010). The PM_{2.5} threshold is equated to PM₁₀ as the County is a federal PM_{2.5} and PM₁₀ attainment area. Furthermore, based on the SCAQMD's Final Methodology to Calculate PM_{2.5} and PM_{2.5} Significance Thresholds, PM₁₀ exhaust is approximately 92 percent PM_{2.5} and 61 percent of mechanical PM₁₀ is PM_{2.5} (SCAQMD 2006).

The air quality impact thresholds used in this analysis are shown in Table 3.10-4.

	Emission Rate								
Pollutant	(lb/hr)	(lb/day)	(tons/yr)						
NO _X	25	250	40						
SO _X	25	250	40						
СО	100	550	100						
PM ₁₀		100	15						
Lead		3.2	0.6						
ROG^1		250							
$PM_{2.5}^{2}$		100							

Table 3.10-4Air Quality Impact Thresholds

SOURCE: SDAPCD Rule 20.2 (12/17/1998) except for ROG and $PM_{2.5}$. ROG = reactive organic gases, CO = carbon monoxide, SO_x = oxides of sulfur, NO_x = oxides of nitrogen,

The threshold for ROGs is based on the Environmental Protection Agency General Conformity Rule, which equates ROG and NO_X emissions under the clean air act and applies the same limitation on ROG and NO_X emissions in ozone non-attainment areas (Federal Register 2010).

2 PM_{2.5} threshold equated to PM₁₀ as the SDAPCD does not set a limit on PM_{2.5} and approximately 92 percent of PM₁₀ exhaust is PM_{2.5} and 61 percent of mechanical PM₁₀ is PM_{2.5} (SCAQMD 2006).

Construction Impacts Results. The contractor provided a list of construction equipment that would be used during each phase. Table 3.10-5 summarizes the construction equipment by construction phase. Some of the phases in Table 3.10-5, such as clearing and grubbing and grading of the mitigation site and roadway, were combined in order to create conservative scenarios for calculating maximum daily emissions. It was assumed that all equipment in a specific phase would operate simultaneously on any given day during the construction period.

Tables 3.10-6 and 3.10-7 summarize the estimated criteria pollutant emissions due to construction activities. California Emissions Estimator Model (CalEEMod) input and output are provided in the air quality analysis (RECON 2014).

The emissions summarized in Tables 3.10-6 and 3.10-7 are the maximum daily emissions for all pollutants that may occur during each phase of construction. By overlapping various phases, these results represent a reasonable worst-case emissions scenario for purposes of assessing air quality impacts. For assessing the significance of the emissions generated during construction of the proposed Project, the construction emissions were compared to the City's thresholds, as identified in Table 3.10-4.

As seen in Tables 3.10-6 and 3.10-7, emissions would be less than the applicable thresholds for all criteria pollutants. Therefore, with the incorporation of Tier II equipment and standard dust control measures, which are not considered mitigation, the full widened roadway alternatives would result in a less than significant impact. The narrow alternatives would involve a smaller footprint, but their construction scenarios would be similar and their construction would also not result in significant air quality impacts.

Fugitive dust is any solid particulate matter that becomes airborne directly or indirectly as a result of the activities of man or natural events (such as windborne dust), other than that emitted from an exhaust stack. Construction dust is composed primarily of chemically inert particles that are too large to enter the human respiratory tract when inhaled. Fugitive dust emissions vary greatly during construction and are dependent on the amount and type of activity, silt content of the soil, and the weather. Vehicles moving over paved and unpaved surfaces, demolition, excavation, earth movement, grading, and wind erosion from exposed surfaces are all sources of fugitive dust.

Fugitive dust emissions could be perceived as a nuisance to the immediate area. As required by Regulation 4, Rules 52, 54, and 55, of the SDAPCD's rules and regulations, dust control during demolition and grading operations would be implemented to reduce potential nuisance impacts.

Possible	Grading of Mitigation	Construct	Demo Existing				Construct Bridge	Roadway Sub-base/	
Equipment	Site	Trestle	Bridge	Drill Piles	Grading	Falsework	Deck	Utilities	Paving
Concrete Pumps				X			Х		
Concrete Trucks				X		Х	Х		Х
Dump Trucks	Х		Х					Х	Х
Wheeled Bulldozers			X		Х			Х	
Excavators				Х					
Cranes		Х	Х	Х		Х	Х		
Drill Rigs				Х			Х		
Welding Equipment		Х	Х	Х		Х	Х		
Skiploaders		Х	X		Х	X	Х	Х	
Wheeled Front- end Loaders		Х	Х		X			Х	Х
Pile Drivers				X			Х		
Ground Compactors	Х				Х			Х	
Motor Graders	Х				Х			Х	
Track Loaders	Х				Х				
Track Bulldozers	Х				Х				
Wheeled Tractor Scrapers	Х				Х				
Backhoe/Loaders			X			Х			
Asphalt Pavers									Х
Cold Planers									X
Flatbed Trucks		Х	X			Х	Х	Х	
Rollers								Х	Х

Table 3.10-5Potential Construction Equipment by Phase

Source: RECON 2014

Table 3.10-6								
Average Daily Construction Emissions for the								
Central Alignment, Western Alignment, and								
Lower Elevation Alternatives								
(pounds/day)								

Pollutant	ollutant Construction Year: 2013				
ROG	9.2	250			
NOx	178.3	250			
СО	140.4	550			
SO_2	0.3	250			
PM ₁₀	14.7	100			
PM _{2.5}	8.5	100			

Source: RECON 2014

Table 3.10-7 Average Daily Construction Emissions for the Eastern Alignment and the Roundabout Alternatives (pounds/day)

Pollutant	Construction Year: 2013	Threshold
ROG	6.6	250
NOx	108.6	250
CO	88.4	550
SO_2	0.2	250
PM_{10}	14.9	100
PM _{2.5}	8.6	100
C DE(2011 201 4	

Source: RECON 2014

3.10.3.2 Issue 1b: Impacts from Operational Traffic Emissions

Regional Emissions. One of the purposes of the proposed project is to relieve congestion, and a result of improved traffic flow will be reduced emissions of pollutants, resulting in a beneficial impact to regional air quality. The project would not generate new vehicle trips, nor would it cause an increase in vehicle miles traveled or vehicle cold starts. Future traffic volumes would be the same for all alternatives. Implementation of the project would not result in an increase in mobile source air emissions. Thus, operational impacts to air quality would not occur.

Local Emissions. Small-scale, localized concentrations of CO above the state and national standards have the potential to occur near congested intersections. Localized, high concentrations of CO are referred to as "CO hot spots." Appropriate procedures and guidelines to determine whether a project poses the potential for a CO hot spot are contained in *Transportation Project-Level Carbon Monoxide Protocol* (CO Protocol) (U.C. Davis 1997). According to the CO Protocol, projects may worsen air quality if they increase the percentage of vehicles in cold start modes by 2 percent or more, significantly increase traffic volumes over existing volumes, or worsen traffic flow. The CO Protocol defines a

significant increase in traffic as an increase in average daily traffic of 5 percent or more from all roadways. Worsening traffic flow is defined for signalized intersections as increasing average delay at intersections operating at LOS E or F or causing an intersection that would operate at LOS D or better without the project, to operate at LOS E or F. Un-signalized intersections are not considered as potential candidates for CO hot spots because un-signalized intersections; further, un-signalized intersections are typically signalized when significant delays in traffic are identified.

The intersection analysis for the existing and existing plus project is summarized in Table 3.10-8 and the cumulative and cumulative plus project intersection operation analysis is summarized in Table 3.10-9. The Roundabout Alternative is not included in Tables 3.10-8 or 3.10-9 due to the difference in operational characteristics; however, based on the traffic analysis, the Roundabout Alternative would result in LOS B or better operations under future 2035 conditions, with the exception of an interim design configuration, which would operate at LOS E in the A.M. and LOS F in the P.M.. While this interim condition continues to operate at an unacceptable LOS under both peak periods, the A.M. period delay would be reduced by 155 seconds and the P.M. period delay would be reduced by 57.9 seconds. Therefore, even under the interim roundabout intersection design, the project would result in more efficient intersection operations.

Based on the intersection operation improvements associated with the project, the traffic analysis shows that all signalized intersections analyzed for the proposed project would operate at LOS D or better under year 2035 cumulative plus project conditions. Therefore, project-generated local mobile-source CO emissions would not result in or substantially contribute to concentrations that exceed the 1-hour or 8-hour ambient air quality standards for CO.

					Exist	ting +	Exist	ting +
	Exi	sting	Exi	sting	Pro	ject	Pro	ject
	AM	Peak	PM	Peak	AM	Peak	PM	Peak
Intersection	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay
Via de la Valle and El Camino Real	D	46.9	D	39.9	С	22.9	С	24.3
Via de la Valle and N. El Camino Real	В	12.1	В	11.3	В	11.4	В	15.3
Polo Grounds Entrance and El Camino Real	D	28.8	F	53.6	В	10.4	В	15.8
San Dieguito Road and El Camino Real	Α	14.6	С	20.3	В	12.9	В	14.2
San Dieguito Road and Old El Camino Real	D	26.2	С	24.1	С	16.8	С	18.5
a proon and a								

 Table 3.10-8

 Existing and Existing Plus Project Intersection Operations

Source: RECON 2014

Bold indicates inacceptable level of service

 Table 3.10-9

 Year 2035 - Cumulative and Cumulative Plus Project Intersection Operations

	Cumulative AM Peak		Cumulative PM Peak		Cumulative + Project AM Peak		Cumulative + Project PM Peak	
Intersection	LOS	Delay	LOS	Delay	LOS	Delay	LOS	Delay
Via de la Valle and El Camino Real	F	192	F	262.1	D	37.1	D	48.7
Via de la Valle and N. El Camino Real	F	90.8	F	103.4	С	24.9	D	35.4
Polo Grounds Entrance and El Camino Real	F	209.2	F	>210	Α	9.6	С	22.9
San Dieguito Road and El Camino Real	C	22.3	D	46	В	19.6	С	20.1
San Dieguito Road and Old El Camino Real	F	53	F	88.6	С	22.3	D	30.8

Source: RECON 2014

Bold indicates inacceptable level of service

3.10.3.3 Issue 1c: Consistency with Local Air Quality Plans

Local air quality plan consistency is evaluated in terms of the questions below.

1. Would the proposed project obstruct or conflict with the implementation of the San Diego RAQS or applicable portions of the SIP?

The RAQS and TCM plan developed by the SDAPCD and SANDAG set forth the steps needed to accomplish attainment of state AAQS. The SIP contains the state strategy for attainment of the NAAQS. The basis for these plans is the distribution of population in the region as projected by SANDAG. Growth forecasting is based in part on the land uses established by the San Diego General Plan. This Project would consist of widening segments of El Camino Real and Via de la Valle, and replacing the bridge on El Camino Real, which is consistent with the general plan designation. As such, the proposed Project would not conflict with the implementation of the local air quality plan. The proposed Project is also a phased arterial project considered in the 2050 Regional Transportation Plan (SANDAG 2011). Additionally, the proposed project is a roadway improvement project is also a phased arterial project considered in the 2050 Regional impacts from the new roadway would be in conformance with this plan. The proposed project full roadway widening alternatives therefore would not obstruct or conflict with the implementation of the San Diego RAQS or applicable portions of the SIP.

Although the Road Capacity Alternative would provide four lanes, it would be set in a narrow footprint and would lack many features of a major road, and therefore is not similar to the design anticipated in the RTP and the RTIP. Thus, conformity with the SIP cannot be presumed for this alternative based on the air quality analysis of the RTP. However, the implementation of the Road Capacity Alternative would have no worse congestion when compared with No Build conditions, and it is concluded that there would be no adverse impact from the implementation of this alternative.

The Bicycle Safety Alternative would provide two travel lanes, bicycle lanes, and a standard median, but keep a narrow footprint. The design for the Bicycle Safety Alternative is not similar to that anticipated in the RTP and the RTIP, and conformity with the SIP cannot be presumed based on the RTP air quality analysis. In terms of number of travel lanes, the Bicycle Safety Alternative is equivalent to the No Build Alternative. As a worst case, the Bicycle Safety Alternative operations would be the same as No Build operations. Therefore, there would be no adverse impact to regional air quality from implementation of the Bicycle Safety Alternative.

2. Would the proposed Plan result in emissions that would violate any air quality standard or contribute substantially to an existing or projected air quality violation?

The region is currently in nonattainment for the federal and state ozone standards. However, Project construction would not result in emissions in excess of the City's air quality emissions thresholds; therefore, air quality emissions during construction would be less than significant. Long-term emissions of air pollutants occur from operational sources. Vehicle travel would generate mobile source emissions including CO, nitrogen oxides, and hydrocarbons. As discussed above, this project would consist of widening segments of El Camino Real and Via de la Valle, and replacing the bridge on El Camino Real. The project does not include any new uses, such as machinery that could result in stationary source emissions. No new mobile source emissions would be attributed to the proposed roadway improvements.

3. Would the proposed Plan result in a cumulatively considerable net increase of PM_{10} , $PM_{2.5}$, or exceeds quantitative thresholds for ozone precursors, NO_x , and volatile organic compounds?

The region is classified as attainment for all criterion pollutants except ozone, PM_{10} , and $PM_{2.5}$. The SDAB is non-attainment for the 8-hour federal and state ozone standards. Ozone is not emitted directly, but is a result of atmospheric activity on precursors. Nitrogen oxides and hydrocarbons (ROGs) are known as the chief "precursors" of ozone. These compounds react in the presence of sunlight to produce ozone.

Construction-related emissions would be less than established significance thresholds for each criteria pollutant. Therefore, the project would not result in a cumulatively considerable increase in ozone precursors during construction. During operation, no new mobile source emissions would be associated with the roadway improvements.

4. Would the proposed Plan expose sensitive receptors (including, but not limited to, schools, hospitals, resident care facilities, or day-care centers) to substantial pollutant concentrations, including air toxics such as diesel particulates?

Based on the intersection operation improvements associated with the project, all signalized intersections analyzed for the proposed project would operate at LOS D or better under existing plus project and year 2035 cumulative plus project conditions. Therefore, project-generated local mobile-source CO emissions would not result in or substantially contribute to concentrations that exceed the 1-hour or 8-hour ambient air quality standards for CO. Additionally, no new mobile source emissions would be associated with the roadway improvements. Project construction would result in some construction-related emissions; however, these emissions would be short term and temporary in nature. Exposure to substantial toxic emissions is not anticipated.

5. Would the proposed Plan create objectionable odors affecting a substantial number of people?

The project does not include any land uses typically associated with odor complaints. During construction, diesel equipment may generate some nuisance odors; however, due to the distance of sensitive receptors from the project site, and the limited time construction equipment would operate at any single place, odors associated with project construction would not affect a substantial number of people.

3.10.3.4 No Build Alternative

Under the No Build Alternative, none of the project components would be constructed. Fugitive dust and other emissions would not be generated by construction activities. The No Build Alternative would not relieve congestion as some of the build alternatives would; however, the No Build Alternative would not generate new vehicle trips, nor would it cause an increase in vehicle miles traveled or vehicle cold starts.

3.10.4 Significance of Air Quality Impacts under CEQA

3.10.4.1 CEQA Significance Thresholds

The City of San Diego CEQA Significance Determination Thresholds guidelines (2011) present the following Air Quality Thresholds: A project may have a significant air quality environmental impact if it could:

- Conflict with or obstruct implementation of the applicable air quality plan.
- Violate any air quality standard or contribute substantially to an existing or projected air quality violation.
- Result in cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including release emissions which exceed quantitative thresholds for ozone precursors).
- Expose sensitive receptors to substantial pollutant concentrations including air toxics such as diesel particulates.
- Create objectionable odors affecting a substantial number of people.
- Release air contaminants beyond the boundaries of the premises upon which the use emitting the contaminants is located.

The City of San Diego CEQA Significance Determination Thresholds (2011) also state: "Federallysupported transportation projects must demonstrate conformity with the State Implementation Plan SIP ("transportation conformity") to ensure that new transportation projects would not jeopardize air quality in non-attainment areas. SANDAG demonstrates conformity for projects in the RTP. Therefore, projects identified in the current Regional Transportation Plan demonstrate transportation conformity. The SDAPCD Regional Air Quality Strategy is the San Diego element of the SIP. Note that Transportation Control Measures are not a part of the RAQS, and that federally-supported non-transportation projects must align with the general conformity requirement.

The Thresholds guidelines also note that quantitative air quality thresholds established by the San Diego Air Pollution Control District were not developed for CEQA purposes or to assess mobile source emissions. The project would not create stationary sources of emissions.

3.10.4.2 Determination of Significance under CEQA

The conclusions of significance under CEQA are summarized in Table 3.10-10.

Construction Impacts. Maximum daily construction emissions for the Central Alignment, Western Alignment, Eastern Alignment, Roundabout, and the Lower Elevation alternatives are projected to be less than the applicable thresholds. The emissions were estimated with the incorporation of standard dust control measures, which are not considered mitigation. Impacts would be less than significant during construction.

The Bicycle Safety and Road Capacity Alternatives have a smaller overall footprint, but the air quality impacts resulting from the construction of the narrow alternatives are anticipated to be similar because they would have construction phases and timelines that are similar to the full widened roadway alternatives. Impacts would be less than significant during construction for these alternatives.

For all build alternatives, fugitive dust emissions could be perceived as a nuisance to the immediate area. As required by Regulation 4, Rules 52, 54, and 55 of the SDAPCD's rules and regulations, dust control during demolition and grading operations would be implemented to reduce potential nuisance impacts to be less than significant.

Project construction would result in some construction-related emissions; however, these emissions would be short term and temporary in nature. Exposure of sensitive receptors to substantial toxic emissions is not anticipated because the staging area would be more than 0.5 mile southwest from the nearest sensitive receptor, which is the Casa Palmera Elderly Care Facility at the corner of Via de la Valle and El Camino Real North, and the duration of construction activities at this location would be only 20 working days. Impacts during construction would be less than significant.

During construction, diesel equipment may generate some nuisance odors; however, due to the distance of sensitive receptors from the project site and the limited time construction equipment would operate at any single place, odors associated with project construction would be less than significant.

Substantial pollutant concentrations such as diesel emissions would not be released beyond the boundaries of the project site because the staging area would be within the project footprint and equipment would not operate outside of project boundaries. Impacts during construction would be less than significant.

Operations Impacts. During operation, the completed transportation facility would carry traffic predicted to occur with or without the project. The project would not generate traffic, or be a source of pollutants. Significance conclusions for the City thresholds are summarized below.

The full widened roadway alternatives would conform to the SIP and therefore would not conflict with or obstruct implementation of the SIP or RAQS. The Road Capacity and Bicycle Safety alternatives are not similar to the design anticipated in the RTP and the RTIP. Thus, conformity with the SIP cannot be presumed for these two alternatives based on the air quality analysis of the RTP. However, the implementation of the narrow alternatives would have no worse congestion when compared with No Build conditions, and it is concluded that there would be no adverse impact from the implementation of the Road Capacity or Bicycle Safety alternatives. Impacts on regional and local air quality plan consistency would be less than significant.

During operation, none of the build alternatives would result in emissions that would violate air quality standards. No new mobile source emissions would be attributed to the proposed roadway improvements. During operation, no air quality standards would be violated, there would be no cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard, no sensitive receptors would be exposed to substantial pollutant concentrations, no objectionable odors would be generated, and no air contaminants would be released. Thus, there would be no significant operational air quality impacts for any of the build alternatives.

3.10.5 Mitigation Measures

No construction impacts would be significant under CEQA. No mitigation measures for construction are necessary for any of the build alternatives.

No operational impacts would be significant under CEQA. No mitigation measures for operation are necessary for any of the build alternatives.

3.10.6 Significant and Unmitigable Impacts under CEQA

No unmitigable impacts would occur during construction or operation for any of the build alternatives.

Impact	Threshold	Central	Road Capacity	Bicycle Safety	Western	Eastern	Round- about	Lower Elevation	No Build
Construction emissions	Violate air quality standards, increase criteria pollutants.	NS	NS	NS	NS	NS	NS	NS	NS
	Expose sensitive receptors to substantial pollutant concentrations, create objectionable odors, release air contaminants.	NS	NS	NS	NS	NS	NS	NS	NS
Operations emissions	Conflict with SIP or RAQS, conflict with air quality plan, violate air quality standards, increase criteria pollutants, expose sensitive receptors to substantial pollutant concentrations, create objectionable odors, release air contaminants.	NS	NS	NS	NS	NS	NS	NS	NS

Table 3.10-10Summary of CEQA Significance for Air Quality Impacts

NS = Not significant

SM = Significant and mitigable to below a level of significance

SU = Significant and unmitigable

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3.11 NOISE

This section evaluates the noise impacts of the proposed project. This section is based on the Noise Technical Report for the El Camino Real Bridge/Road Widening Project (Ldn Consulting, Inc. 2013). This separate technical report is incorporated into this recirculated EIR by reference, and is available for inspection at the City. This section focuses on impacts from noise on human receptors. Impacts from noise on biological resources are discussed in Section 3.12.

3.11.1 Methodology and Regulatory Setting

3.11.1.1 Noise Terminology

Sound is a vibratory disturbance created by a moving or vibrating source, in the pressure and density of a gaseous, liquid medium or in the elastic strain of a solid, which is capable of being detected by the hearing organs. *Noise* is defined as sound that is loud, unpleasant, unexpected, or undesired and may therefore be classified as a more specific group of sounds. The effects of noise on people can include general annoyance, interference with speech communication, sleep disturbance and, in the extreme, hearing impairment (Caltrans 1998). The principal noise sources of interest in this study are vehicles on the study area roadways and the construction equipment that would be used for construction of the modified roadways and bridge.

Noise levels are described in units called the decibel (dB). The human ear is not equally sensitive to all frequencies within the sound spectrum, and the "A-weighted" noise scale, which approximates the frequency response of the average young ear, is used. Noise levels using A-weighted measurements are written as dBA. Table 3.11-1 shows the relationship of various noise levels to commonly experienced noise events.

Human perception of noise has no simple correlation with acoustical energy. The perception of noise is not linear in terms of dBA or in terms of acoustical energy. Two noise sources do not "sound twice as loud" as one source. It is widely accepted that the average healthy ear can barely perceive changes of 3 dBA, increase or decrease; that a change of 5 dBA is readily perceptible; and that an increase (decrease) of 10 dBA sounds twice (half) as loud¹ (Caltrans 1998).

Average noise levels over a period of minutes or hours are usually expressed as dBA L_{eq} , or the equivalent noise level for that period of time. The period of time average may be specified; $L_{eq(3)}$ would be a 3-hour average; when no period is specified, a 1-hour average is assumed.

Sound from a small, localized source (approximating a "point" source) radiates uniformly outward as it travels away from the source in a spherical pattern. The sound level decreases or drops off at a rate of 6 dB for each doubling of the distance. However, roadway traffic noise is not a single, stationary point source of sound. The movement of vehicles makes the source of the sound appear to emanate from a line (line source) rather than a point when viewed over some time interval. The drop-off rate for a line source is 3 decibels for each doubling of distance. Change in noise levels in the outdoor environment is perceived as follows: 3 dBA barely perceptible, 5 dBA readily perceptible, and 10 dBA perceived as a doubling or halving of noise.

The City uses community noise equivalent level (CNEL) to establish noise standards for compatible land use. CNEL is a 24-hour weighted average measure. The computation of CNEL adds 5 dBA to the average hourly noise levels between 7 P.M. and 10 P.M. - the evening hours, and 10 dBA to the average hourly noise levels between 10 P.M. and 7 A.M. - the nighttime hours.

¹ The "trained" as opposed to "average" ear can detect changes of 2 dBA in normal environmental noise.

This weighting accounts for the increased human sensitivity to noise in the evening and nighttime hours.

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
	110	Rock Band
Jet Fly-over at 300 meters (1,000 feet)	100	
Gas Lawn Mower at 1 meter (3 feet)	90	
Diesel Truck at 15 meters (50 feet), at 80 kilometers per hour (50 miles per hour)	80	Food Blender at 1 meter (3 feet) Garbage Disposal at 1 meter (3 feet)
Noisy Urban Area, Daytime Gas Lawn Mower at 30 meters (100 feet)	70	Vacuum Cleaner at 3 meters (10 feet)
Commercial Area Heavy Traffic at 90 meters (300 feet)	60	Normal Speech at 1 meter (3 feet)
Quiet Urban Daytime	50	Large Business Office Dishwasher in Next Room
Quiet Urban Nighttime	40	Theater, Large Conference Room (Background)
Quiet Suburban Nighttime	30	Library
Quiet Rural Nighttime	20	Bedroom at Night, Concert Hall (Background)
	10	Broadcast/Recording Studio
Lowest Threshold of Human Hearing	0	Lowest Threshold of Human Hearing

Table 3.11-1 Typical Noise Levels

Source: Caltrans, Technical Noise Supplement, Traffic Noise Analysis Protocol. October 1998.

3.11.1.2 Applicable Regulations

California Environmental Quality Act

Under CEQA, a substantial noise increase may result in a significant adverse environmental effect and, if so, must be mitigated or identified as a noise impact for which it is likely that no, or only partial, abatement measures are available. Specific economic, social, environmental, legal, and technological conditions may make additional noise attenuation measures infeasible.

City of San Diego

Noise-Land Use Compatibility

The City developed and published Significance Determination Thresholds for use in CEQA determinations. The CEQA significance standards are provided in Table 3.11-2. Based on the City's 2011 Significance Determination Thresholds, a significant noise impact would occur if implementation of the proposed project would:

- 1. Result in the exposure of noise-sensitive land uses to future noise levels which exceed those established in the adopted General Plan, noise ordinance, ALUCPs, or applicable standards of other agencies.
- 2. Result in a substantial increase in the existing ambient noise levels.
- 3. Result in increased land use incompatibilities associated with noise.
- 4. Result in construction or operation noise levels during the breeding season that would exceed 60 dBA L_{eq} or existing ambient noise level, if above 60 dBA L_{eq} . (Analyzed in Section 3.12)

Structure of Proposed Use that would be Impacted by Traffic Noise	Interior Space	Exterior Useable Space ¹	General Indication of Potential Significance
Single-family detached	45 dB	65 dB	
Multi-family, school, library, hospital, day care center, hotel, motel, park, convalescent home	Development Services Department (DSD) ensures 45 dB pursuant to Title 24	65 dB	Structure or outdoor useable area ² is <50 feet from the center of the closest (outside) lane on a street with existing or future ADTs >7,500
Office, church, business, professional uses	n/a	70 dB	Structure or outdoor useable area is <50 feet from the center of the closest lane on a street with existing or future ADTs >20,000
Commercial, retail, industrial, outdoor spectator sports uses	n/a	75 dB	Structure or outdoor useable area is <50 feet from the center of the closest lane on a street with existing or future ADTs >40,000

Table 3.11-2 Traffic Noise Significance Thresholds (dBA CNEL)

Source: City of San Diego 2011 (CEQA Significance Determination Thresholds Table K-2). ¹ If a project is currently at or exceeds the significance thresholds for traffic noise described above and noise levels would result in less than a 3-dB increase, then the impact is not considered significant.

² Exterior useable areas do not include residential front yards or balconies unless the areas such as balconies are part of the required useable open space calculation for multi-family units.

The maximum acceptable sound level is 65 dBA CNEL for residential development; 70 dBA CNEL for offices, and 75 dBA CNEL for commercial facilities, golf courses, and outdoor spectator areas. These standards typically apply to usable exterior use areas adjacent to transportation noise sources such as roadways and railways.

The City's Noise Element of the General Plan specifies compatibility standards for different categories of land use. The noise-land use compatibility guidelines are intended to be used for future development within San Diego to prevent future incompatibilities and are provided in Table 3.11-3.

	Exterior Noise Exposure (dBA CNEL)				
		50 6 I I	57	07 	'5
Open Space and Parks and Recreational					
Community & Neighborhood Parks; Passive Recreation					
Regional Parks; Outdoor Spectator Sports, Golf Courses; Athletic Fields; Outdoor Spectator	-				
Sports, Water Recreational Facilities; Horse Stables; Park Maint. Facilities					
Agricultural					
Animal Raising, Maintain & Keeping; Commercial Stables					
Residential					
Single Units; Mobile Homes; Senior Housing		45			
Multiple Units; Mixed-Use Commercial/Residential; Live Work; Group Living	+	-			
Accommodations *For uses affected by aircraft noise, refer to Policies NE-D.2. & NE-D.3.		45	45		
Institutional					
Hospitals; Nursing Facilities; Intermediate Care Facilities; Kindergarten through Grade 12		45			
Educational Facilities; Libraries; Museums; Places of Worship; Child Care Facilities		45			
Vocational or Professional Educational Facilities; Higher Education Institution Facilities		45	45		
(Community or Junior Colleges, Colleges, or Universities)	_				
Cemeteries					
Sales					
Building Supplies/Equipment; Food, Beverages & Groceries; Pets & Pet Supplies; Sundries,			50	50	
Pharmaceutical, & Convenience Sales; Wearing Apparel & Accessories			50	50	
Commercial Services					_
Building Services; Business Support; Eating & Drinking; Financial Institutions;			50	50	
Assembly & Entertainment; Radio & Television Studios; Golf Course Support	_				
/isitor Accommodations	_	45	45	45	
Offices					
Business & Professional; Government; Medical, Dental & Health Practitioner; Regional &			50	50	
Corporate Headquarters					
Vehicle and Vehicular Equipment Sales and Services Use Commercial or Personal Vehicle Repair & Maintenance; Commercial or Personal Vehicle		<u> </u>			_
Sales & Rentals; Vehicle Equipment & Supplies Sales & Rentals; Vehicle Parking					
Wholesale, Distribution, Storage Use Category					_
Equipment & Materials Storage Yards; Moving & Storage Facilities; Warehouse;	1				
Wholesale Distribution					
Industrial					
Heavy Manufacturing; Light Manufacturing; Marine Industry; Trucking & Transportation					
Terminals; Mining & Extractive Industries	-				
Research & Development				50	
Indoor Uses Standard construction methods should attenuate ex noise level. Refer to Section I.	terior noi:	se to an i	accepta	ble ind	oor
Compatible Outdoor Uses Activities associated with the land use may be carrie	d out.				
Conditionally Indoor Uses Building structure must attenuate exterior noise to t number for occupied areas. Refer to Section I.	he indoor	noise le	vel indi	cated b	y th
Compatible Outdoor Uses Outdoor activities acceptable. Refer to Section I.	zed and in	ncorpora	ted to	make ti	he
outdoor decirities deceptation herei to bection h					
Indoor Uses New construction should not be undertaken.					_

 Table 3.11-3

 City of San Diego Land Use Compatibility Guidelines (dBA CNEL)

Source: City of San Diego Noise Element 2008a.

The community land uses surrounding Via de la Valle are urbanized residential, commercial, rural equestrian and recreational uses. As shown in Table 3.11-3, residential, commercial, and equestrian (assumed similar to commercial stables) uses are "compatible" with noise levels up to 60, 65, and 70 CNEL, respectively. These land uses are "conditionally compatible" with noise levels up to 65, 75, and 75 CNEL, respectively. "Compatible" means that activities associated with the land use may be carried out, and "conditionally compatible" means that feasible noise mitigation techniques should be analyzed and incorporated to make the outdoor activities acceptable.

Construction

Section 59.5.0404 of the City's Noise Abatement and Control Ordinance states that:

- A. It shall be unlawful for any person, between the hours of 7:00 P.M. of any day and 7:00 A.M. of the following day, or on legal holidays as specified in Section 21.04 of the San Diego Municipal Code, with exception of Columbus Day and Washington's Birthday, or on Sundays, to erect, construct, demolish, excavate for, alter or repair any building or structure in such a manner as to create disturbing, excessive or offensive noise...
- B. It shall be unlawful for any person, including the City of San Diego, to conduct any construction activity so as to cause, at or beyond the property lines of any property zoned residential, an average sound level greater than 75 decibels during the 12-hour period from 7:00 A.M. to 7:00 P.M.

Wildlife Habitat

In 1991, the USFWS recommended that hourly noise levels not exceed 60 dBA L_{eq} or ambient conditions, whichever is greater, to protect the gnatcatcher and other endangered bird species. The City of San Diego has adopted this standard for all sensitive species. Therefore, the 60 dBA Leq or ambient would be used as the noise criteria to assess noise impacts on sensitive wildlife both on- and off-site. This issue is analyzed in Section 3.12.

County of San Diego

Noise-Land Use Compatibility

There are residences in the project vicinity that are located on unincorporated County land. The County Guidelines for Determining Significance (2009) state that significant impacts would occur if project implementation resulted in the exposure of any on- or off-site, existing, or reasonably foreseeable future noise-sensitive land use (NSLU) to exterior or interior noise in excess of any of the following:

- A. Exterior Locations:
 - i. 60 decibels (dB) (Community Noise Equivalent Level [CNEL]); or
 - ii. An increase of 10 dB (CNEL) over pre-existing noise.

In the case of single-family residential detached NSLUs, exterior noise shall be measured at an outdoor living area which adjoins and is on the same lot as the dwelling, and which contains at least the following minimum area:

- (1) Net lot area up to 4,000 square feet: 400 square feet
- (2) Net lot area 4,000 square feet to 10 acres: 10 percent of net lot area
- (3) Net lot area over 10 acres : 1 acre

For all other projects, exterior noise shall be measured at all exterior areas provided for group or private usable open space.

- B. Interior Locations: 45 dB (CNEL) except for the following cases:
 - i. Rooms which are usually occupied only a part of the day (schools, libraries, or similar facilities), the interior 1-hour average sound level due to noise outside should not exceed 50 decibels (A).
 - ii. Corridors, hallways, stairwells, closets, bathrooms, or any room with a volume less than 490 cubic feet.

When existing noise levels already exceed the noise guidelines, a different standard is applied. When an increase of 3 dB to 5 dB occurs, the result is a perceptible increase in noise, and in cases where existing noise levels already exceed applicable noise guidelines, an increase of 3 dB may be considered significant. An increase in 3 dB would result from a doubling of the traffic volume on a roadway.

Revisions to the County's General Plan Noise Element have not been updated in the Guidelines at this time; however, the new General Plan noise compatibility guidelines and standards as contained in the General Plan are applicable to the proposed project. Table 3.11-4 provides the County's current noise compatibility guidelines, and Table 3.11-5 provides the County's noise standards.

Construction

Section 36.409 of the County's Code of Regulatory Ordinances states that:

Except for emergency work, it shall be unlawful for any person to operate construction equipment or cause construction equipment to be operated that exceeds an average sound level of 75 decibels for an 8-hour period, between 7:00 A.M. and 7:00 P.M., when measured at the boundary line of the property where the noise source is located or on any occupied property where the noise is being received.

				F	Exterior No	oise Level	S	
	Land Use Category	5	55	60	65	70	75	80
	Residential—single family residences,							
Α	mobile homes, senior housing,							
	convalescent homes							
В	Residential—multi-family residences,							
Ъ	mixed-use (commercial/residential)							
С	Transient lodging-motels, hotels, resorts							
D	Schools, churches, hospitals, nursing							
D	homes, child care facilities							
Е	Passive recreational parks, nature							
Ľ	preserves, contemplative spaces, cemeteries							
F	Active parks, golf courses, athletic fields,							
1	outdoor spectator sports, water recreation							
	Office\professional, government,							
G	medical\dental, commercial, retail,							
	laboratories							
	Industrial, manufacturing, utilities,							
Н	agriculture, mining, stables, ranching,							
	warehouse, maintenance/repair							
	ACCEPTABLE—Specified land use is							
	buildings involved are of normal const							
	CONDITIONALLY ACCEPTABLE-							
	only after a detailed noise analysis is c							
	necessary to achieve acceptable levels							
	noise levels are listed in Table 8, Noise							
	deemed Acceptable, the appropriate co							
	been provided to the greatest extent pr							
	UNACCEPTABLE—New constructio							
* Den	notes facilities used for part of the day; therefore, an hour	y stand	lard woul	d be used	rather than C	NEL, refer t	to Table 4.	

 Table 3.11-4

 County of San Diego Noise Compatibility Guidelines (dBA CNEL)

Source: County of San Diego Noise Element 2010.

Table 3.11-5County of San Diego Noise Standards

- 1. The exterior noise level (as defined in Item 3) standard for Category A shall be 60 CNEL, and the interior noise level standard for indoor habitable rooms shall be 45 CNEL.
- 2. The exterior noise level standard for Categories B and C shall be 65 CNEL, and the interior noise level standard for indoor habitable rooms shall be 45 CNEL.
- 3. The exterior noise level standard for Categories D and G shall be 65 CNEL and the interior noise level standard shall be 50 dBA Leq (one hour average).
- 4. For single-family detached dwelling units, "exterior noise level" is defined as the noise level measured at an outdoor living area which adjoins and is on the same lot as the dwelling, and which contains at least the following minimum net lot area:
 - (i) for lots less than 4,000 square feet in area, the exterior area shall include 400 square feet,
 - (ii) for lots between 4,000 square feet to 10 acres in area, the exterior area shall include 10 percent of the lot area;
 - (iii) for lots over 10 acres in area, the exterior area shall include 1 acre.
- 5. For all other residential land uses, "exterior noise level" is defined as noise measured at exterior areas which are provided for private or group usable open space purposes. "Private Usable Open Space" is defined as usable open space intended for use of occupants of one dwelling unit, normally including yards, decks, and balconies. When the noise limit for Private Usable Open Space cannot be met, then a Group Usable Open Space that meets the exterior noise level standard shall be provided. "Group Usable Open Space" is defined as usable open space intended for common use by occupants of a development, either privately owned and maintained or dedicated to a public agency, normally including swimming pools, recreation courts, patios, open landscaped areas, and greenbelts with pedestrian walkways and equestrian and bicycle trails, but not including off-street parking and loading areas or driveways.
- 6. For non-residential noise sensitive land uses, exterior noise level is defined as noise measured at the exterior area provided for public use.
- 7. For noise sensitive land uses where people normally do not sleep at night, the exterior and interior noise standard may be measured using either CNEL or the one-hour average noise level determined at the loudest hour during the period when the facility is normally occupied.
- 8. The exterior noise standard does not apply for land uses where no exterior use area is proposed or necessary, such as a library.
- 9. For Categories E and F the exterior noise level standard shall not exceed the limit defined as "Acceptable" in Table N-1 or an equivalent one-hour noise standard.

3.11.1.3 Methodology

FHWA Traffic Noise Model, version 2.5 (TNM) was used to predict existing and future traffic noise levels at specific receiver locations (FHWA 2004). Inputs to TNM include the three-dimensional coordinates of roadways, noise receivers, and topographic or planned barriers that would affect noise propagation; vehicle volumes and speeds, by type of vehicle; and absorption factors based on modeled ground type. Existing and future roadway geometries and elevation data were taken from design drawing prepared by the project engineer. (Rick Engineering 2012) Receiver locations were chosen from design drawings, aerial photographs, and site observations. Adjustment (K-factors) factors may also be applied to calibrate the TNM to actual site conditions.

TNM outputs are predicted loudest hour noise levels at the selected receivers; thus, to relate the modeled noise levels to the City and County noise standards, 1 dBA was added to modeled level to represent the CNEL. Receptors were modeled at exterior locations 5 feet above the existing grade.

Traffic volumes on all study area roadways were taken from the project traffic report (Urban Systems Associates 2012). Existing speeds were developed from site visits and driving the alignment. Vehicle mixes for area roadways were taken from field counts conducted in conjunction with noise measurements.

Future traffic vehicle mixes on all area roadways were assumed to be the same as those used in the existing conditions. Future speeds on all but the Roundabout Alternative were also assumed to be the same as the existing conditions. Under the Roundabout Alternative, average traffic speeds are assumed to be 30 mph. Future (2035) traffic volumes were obtained from the project traffic report (Urban Systems Associates 2012). Table 3.11-6 provides the traffic volume mix used in TNM. All traffic volumes used in TNM for each scenario are included in Appendix B of the Noise Technical Report (Ldn Consulting, Inc. 2013).

	Volume by Direction								
Roadway Segment	Automobiles	Medium Trucks	Heavy Trucks						
Via de la Valle	95.4%	2.6%	1%						
Camino Del Real	98%	1%	1%						
San Dieguito Road	98%	1%	1%						
El Camino Real North	98%	1%	1%						

Table 3.11-6Traffic Volume Mix Used in TNM

Source: Ldn Consulting, Inc. 2013

Where no heavy or medium trucks were observed, or the value was less than 1%, 1% was used.

3.11.2 Affected Environment

3.11.2.1 Ambient and Background Noise Sources

The principal existing noise sources of interest in the project area are vehicles on El Camino Real, San Dieguito Road, Via de la Valle, and Old El Camino Real. I-5 traffic generates additional background noise in the project area. In order to determine the ambient noise level, measurements were taken in the project area and are described below.

3.11.2.2 Noise Receptor and Measurement Site Selection

Noise sensitive receptors are generally considered to be humans who are associated with activities or land uses that may cause them to be subject to the stress of significant interference from noise. Land uses that are often associated with sensitive receptors include residential dwellings, mobile homes, hotels, motels, hospitals, nursing homes, education facilities, and libraries. Recreation areas are classified as noise sensitive land uses by the FHWA. Sensitive receptors may also include threatened or endangered noise sensitive biological species.

Existing sensitive receptors in the project area are single-family residences and recreational areas. Other receptor locations selected to describe the existing and future noise environment include commercial establishments and properties with planned or potential future development. In addition, two endangered bird species have been identified in the project area, the least Bell's vireo and the light-footed clapper rail (see Section 3.12).

3.11.2.3 Noise Measurements

To determine the existing noise environment and assess the potential impacts of noise resulting from the widening of El Camino Real, noise measurements were taken by RECON Environmental, Inc. with one Larson-Davis Model 820 Type 2 Integrating Sound Level Meter, serial number 1824. The following parameters were used:

Filter: A-weightedResponse: FastTime History Period: 5 seconds

The meter was calibrated prior to the day's measurements. Seven ground-floor measurements (5 feet above the ground) were taken adjacent to Via de la Valle, El Camino Real, and San Dieguito Road. Additionally, while the ground-floor measurements were being made, traffic counts were taken for 15 minutes each.

Noise measurements were taken on Friday, March 2, 2012, between the hours of 11:30 A.M. and 3:00 P.M. to obtain existing ambient noise levels. The weather was warm and sunny with a slight breeze. A total of seven measurements were made on the project site as described below.

The primary source of on-site noise was due to traffic on Via De La Valle and El Camino Real. The locations of the measurements are shown on Figure 3.11-1, and the noise measurement data are contained in Appendix A of the Noise Technical Report (Ldn Consulting, Inc. 2013).

- Measurement 1 was taken on Via De La Valle east of the intersection of Via De La Valle and El Camino Real, near Casa Palmera. The dominant noise source was traffic on Via De La Valle. During the 15-minute measurement period, traffic on Via De La Valle was counted.
- Measurement 2 was taken on Via De La Valle west of the intersection of Via De La Valle and El Camino Real. The dominant noise source was traffic on Via De La Valle. During the 15-minute measurement period, traffic on Via De La Valle was counted.
- Measurement 3 was taken on Via De La Valle east of the intersection of Via De La Valle and El Camino Real, near Market Restaurant + Bar. The dominant noise source was

traffic on Via De La Valle and El Camino Real. During the 15-minute measurement period, traffic on Via De La Valle was counted.

- Measurement 4 was taken on El Camino Real south of the intersection of El Camino Real and Via De La Valle, near Mary's Tack and Feed. The dominant noise source was traffic on Via De La Valle and El Camino Real. During the 15-minute measurement period, traffic on El Camino Real was counted.
- Measurement 5 was taken on El Camino Real between Via De La Valle and San Dieguito Road, near the San Diego Polo Club. The dominant noise source was traffic on El Camino Real. During the 15-minute measurement period, traffic on El Camino Real was counted.
- Measurement 6 was taken on El Camino Real north of the intersection of El Camino Real and San Dieguito Road, near the Fairbanks Ranch Country Club Golf Course. The dominant noise source was traffic on El Camino Real. During the 15-minute measurement period, traffic on El Camino Real was counted.
- Measurement 7 was taken on San Dieguito Road east of the intersection of San Dieguito Road and Old El Camino Real. The dominant noise source was traffic San Dieguito Road. During the 15-minute measurement period, traffic on San Dieguito Road was counted.

3.11.2.4 Existing Noise Levels

During the measurement periods, the average noise levels at each measurement location are presented in Table 3.11-7. The existing noise levels varied between 70 and 75 dBA adjacent to the roadways.

Measurement	Roadway	Noise Level dBA	Distance from Centerline (feet)
1	Via de La Valle	70.3	43.8
2	Via de La Valle	73.9	17.3
3	Via de La Valle	70.5	25.8
4	El Camino Real	70.6	19.4
5	El Camino Real	74.8	15.7
6	El Camino Real	73.0	30.5
7	San Dieguito Road	72.6	22.8

Table 3.11-7 Average Noise Level

Source: Ldn Consulting, Inc. 2013

3.11.3 Impacts

Would the surrounding uses experience noise levels that would exceed City of San Diego and Caltrans standards due to implementation of the project?

3.11.3.1 Issue 1a: Impacts of Traffic Noise

Several of the alternatives are similar from a noise perspective. The Central Alignment Alternative, the Road Capacity Alternative, the Bicycle Alignment Alternative, and the Lower Alignment alternatives would result in the same potential impacts due to the similarity of the alignment and future traffic volumes. Thus, the alternatives analyzed in the Noise Technical Report are the Central Alignment Alternative, the Western Alignment Alternative, the Eastern Alignment Alternative, and the Roundabout Alternative. The modeled receptor locations for all alignment alternatives are provided in Figure 3.11-2.

The analysis of the existing and existing plus project for each alternative is provided to assess the direct traffic impact of the proposed project. The 2035 analysis is provided for determining future cumulative traffic impacts of the proposed roadway improvements. A detailed discussion of impacted receptors under each alternative is provided under separate headings. Predicted noise levels for the Central Alignment are shown in Table 3.11-8, the noise levels and changes in noise levels for Western Alignment are shown in Table 3.11-9, the Eastern Alignment is shown in Table 3.11-10, and the Roundabouts Alternative is shown in Table 3.11-11.

Increases in noise levels under any of the build alternatives would be caused primarily by the change in height from raising El Camino Real and the intersection at Via de la Valle above the flood plain or a movement of the roadway closer to local receivers. Traffic noise-level increases under the No Project Alternative are due only to projected increases in traffic volumes on the existing local roadways. The noise level decreases shown in the modeling would be the result of a receptor location receiving additional shielding from topography or increased distances between the roadway and receivers.

Additionally, under the Roundabout Alternative, there are other noise level reductions due to less braking and accelerating as traditional intersection movements, as well as an average decrease in speed associated with safe approach and departure speeds considered during the design stage of roundabouts.

Receivers R1 through R12, R14, R15, R21, and R22 are located in the City of San Diego. These receivers include four residences, the horse park, polo grounds, a golf course, a chemical dependency treatment facility, and several commercial land uses. R1 through R3 and R11 represent the residential land uses. R4 through R7, and R9 represent recreation uses. R4 through R7 represent the golf course, R9 represents the polo field, R10 represents agricultural uses, i.e., animal pens, and R22 represents a chemical dependency treatment facility. All other receivers are habitat or commercial land uses.

Receivers R13, R16 through R20, and R23 through R25 are located in the County of San Diego. These receivers include six residences and two commercial businesses. All County receivers are located north of Via de la Valle.

			Existing	Exis	sting +	No	No Project			
			Conditions	Pr	oject	Fi	uture		Cumulative	+ Project
Receiver ID	Description	Use	CNEL	CNEL	Increase	CNEL	Increase	CNEL	Total Increase	Project Contribution
R1	4110 Rancho Las Brisas Trail	Residential	52	52	0	54	2	55	3	1
R2	14333 San Dieguito Rd	Residential	47	47	0	49	2	50	3	1
R3	14333 San Dieguito Rd	Residential	51	51	0	53	2	53	2	0
R4	14332 San Dieguito Rd	Golf Course	58	58	0	60	2	61	3	1
R5	14332 San Dieguito Rd	Golf Course	57	57	0	59	2	61	4	2
R6	14332 San Dieguito Rd	Golf Course	54	55	1	57	3	58	4	1
R7	14332 San Dieguito Rd	Golf Course	50	52	2	53	3	55	5	2
R8	4519 South Lane	Flood Plain/ Habitat	66	66	0	69	3	69	3	0
R9	14555 El Camino Real	Polo Grounds	57	58	1	60	3	61	4	1
R10	2847 Via De La Valle	Animal Pens	52	53	1	55	3	56	4	1
R11	14710 Via Del Canon	Residential	46	46	0	48	2	48	2	0
R12	2847 Via De La Valle	Offices	53	53	0	55	2	56	3	1
R13	3790 Via De La Valle (Tommy V's)	Commercial	64	65	1	68	4	69	5	1
R14	3665 Via De La Valle (All Creatures Pets Hospital)	Commercial	62	62	0	65	3	65	3	0
R15	3675 Via De La Valle (Mary's Tack and Feed)	Commercial	67	67	0	70	3	71	4	1
R16	3702 Via De La Valle (Market Bar and Grill)	Commercial	63	64	1	66	3	67	4	1
R17	14820 De La Valle Place	Residential	53	54	1	56	3	57	4	1
R18	14841 De La Valle Place	Residential	49	49	0	52	3	52	3	0
R19	14841 De La Valle Place	Residential	51	52	1	54	3	55	4	1
R20	14801 Fisher CV	Residential	49	51	2	53	4	54	5	1
R21	3840 Via De La Valle (Gatlin Development)	Commercial	53	54	1	58	5	58	5	0
R22	14750 El Camino Real (Casa Palmera)	Treatment Facility	56	58	2	61	5	62	6	1
R23	14805 Fisher CV	Residential	49	50	1	53	4	54	5	1
R24	5005 Rancho Del Madison	Residential	55	55	0	58	3	59	4	1
R25	14905 Arroyo Rosita	Residential	54	54	0	57	3	57	3	0
Note: Due to	model accuracy noise levels are rounded to the	e nearest whole decibel.		•	•	•	•			-

Table 3.11-8Central Alignment Traffic Noise Levels

Source: Ldn Consulting, Inc. 2013

			Existing	Exis	sting +		No Project Future			
			Conditions	Pr	oject	No Pro			Cumulative +	Project
									Total	Project
Receiver ID	Description	Use	CNEL	CNEL	Increase	CNEL	Increase	CNEL	Increase	Contribution
R1	4110 Rancho Las Brisas Trail	Residential	52	52	0	54	2	55	3	3
R2	14333 San Dieguito Rd	Residential	47	47	0	49	2	49	2	2
R3	14333 San Dieguito Rd	Residential	51	54	3	53	2	56	5	2
R4	14332 San Dieguito Rd	Golf Course	58	59	1	60	2	61	3	2
R5	14332 San Dieguito Rd	Golf Course	57	58	1	59	2	61	4	3
R6	14332 San Dieguito Rd	Golf Course	54	55	1	57	3	58	4	3
R7	14332 San Dieguito Rd	Golf Course	50	53	3	53	3	56	6	3
R8	4519 South Lane	Flood Plain/Habitat	66	68	2	69	3	70	4	2
R9	14555 El Camino Real	Polo Grounds	57	57	0	60	3	60	3	3
R10	2847 Via De La Valle	Animal Pens	52	53	1	55	3	56	4	3
R11	14710 Via Del Canon	Residential	46	45	-1	48	2	48	2	3
R12	2847 Via De La Valle	Offices	53	53	0	55	2	56	3	3
R13	3790 Via De La Valle (Tommy V's)	Commercial	64	66	2	68	4	69	5	3
R14	3665 Via De La Valle	Commercial	62	62	0	65	3	65	3	3
	(All Creatures Pets Hospital)									
R15	3675 Via De La Valle	Commercial	67	68	1	70	3	71	4	3
	(Mary's Tack and Feed)									
R16	3702 Via De La Valle (Market Bar and Grill)	Commercial	63	62	-1	66	3	65	2	3
R17	14820 De La Valle Place	Residential	53	54	1	56	3	57	4	3
R18	14841 De La Valle Place	Residential	49	48	-1	52	3	51	2	3
R19	14841 De La Valle Place	Residential	51	52	1	54	3	55	4	3
R20	14801 Fisher CV	Residential	49	51	2	53	4	54	5	3
R21	3840 Via De La Valle (Gatlin Development)	Commercial	53	55	2	58	5	59	6	4
R22	14750 El Camino Real (Casa Palmera)	Treatment Facility	56	59	3	61	5	62	6	3
R23	14805 Fisher CV	Residential	49	51	2	53	4	54	5	3
R24	5005 Rancho Del Madison	Residential	55	56	1	58	3	59	4	3
R25	14905 Arroyo Rosita	Residential	54	54	0	57	3	57	3	3
Note: Due to	model accuracy noise levels are rounded to the ne	arest whole decibel.								

 Table 3.11-9

 Western Alignment Traffic Noise Levels

Source: Ldn Consulting, Inc. 2013

			Existing		Existing +		Project			
			Conditions	Pr	oject	Fu	iture	Cur	nulative + Pro	oject
									Total	
Receiver ID	Description	Use	CNEL	CNEL	Increase		Increase	CNEL	Increase	CNEL
R1	4110 Rancho Las Brisas Trail	Residential	52	52	0	54	2	55	3	1
R2	14333 San Dieguito Rd	Residential	47	47	0	49	2	50	3	1
R3	14333 San Dieguito Rd	Residential	51	54	3	53	2	56	5	3
R4	14332 San Dieguito Rd	Golf Course	58	59	1	60	2	61	3	1
R5	14332 San Dieguito Rd	Golf Course	57	59	2	59	2	62	5	3
R6	14332 San Dieguito Rd	Golf Course	54	57	3	57	3	60	6	3
R7	14332 San Dieguito Rd	Golf Course	50	55	5	53	3	58	8	5
R8	4519 South Lane	Flood Plain/Habitat	66	68	2	69	3	70	4	1
R9	14555 El Camino Real	Polo Grounds	57	63	6	60	3	66	9	6
R10	2847 Via De La Valle	Animal Pens	52	51	-1	55	3	54	2	-1
R11	14710 Via Del Canon	Residential	46	46	0	48	2	49	3	1
R12	2847 Via De La Valle	Offices	53	52	-1	55	2	55	2	0
R13	3790 Via De La Valle (Tommy V's)	Commercial	64	67	3	68	4	70	6	2
R14	3665 Via De La Valle (All Creatures Pets Hospital)	Commercial	62	63	1	65	3	66	4	1
R15	3675 Via De La Valle (Mary's Tack and Feed)	Commercial	67	68	1	70	3	71	4	1
R16	3702 Via De La Valle (Market Bar and Grill)	Commercial	63	59	-4	66	3	62	-1	-4
R17	14820 De La Valle Place	Residential	53	55	2	56	3	58	5	2
R18	14841 De La Valle Place	Residential	49	49	0	52	3	52	3	0
R19	14841 De La Valle Place	Residential	51	53	2	54	3	56	5	2
R20	14801 Fisher CV	Residential	49	53	4	53	4	56	7	3
R21	3840 Via De La Valle (Gatlin Development)	Commercial	53	55	2	58	5	59	6	1
R22	14750 El Camino Real (Casa Palmera)	Treatment Facility	56	61	5	61	5	64	8	3
R23	14805 Fisher CV	Residential	49	52	3	53	4	55	6	2
R24	5005 Rancho Del Madison	Residential	55	56	1	58	3	59	4	1
R25	14905 Arroyo Rosita	Residential	54	55	1	57	3	59	5	2
Note: Due to	model accuracy noise levels are rounded to the	nearest whole decibel.			•				-	
	1. 1 2012									

Table 3.11-10Eastern Alignment Traffic Noise Levels

Source: Ldn Consulting, Inc. 2013

			Existing		Existing +		Project				
			Conditions	Pr	oject	Fu	iture	Cur	nulative + Pro	oject	
D · D			CD IFI	CULT	-	CUT		CUTE	Total	CLIEF	
Receiver ID	Description	Use	CNEL	CNEL	Increase	CNEL	Increase	CNEL	Increase	CNEL	
R1	4110 Rancho Las Brisas Trail	Residential	52	52	0	54	2	52	-2	0	
R2	14333 San Dieguito Rd	Residential	47	50	3	49	2	50	1	3	
R3	14333 San Dieguito Rd	Residential	51	56	5	53	2	56	3	5	
R4	14332 San Dieguito Rd	Golf Course	58	60	2	60	2	60	0	2	
R5	14332 San Dieguito Rd	Golf Course	57	57	0	59	2	57	-2	0	
R6	14332 San Dieguito Rd	Golf Course	54	55	1	57	3	55	-2	1	
R7	14332 San Dieguito Rd	Golf Course	50	52	2	53	3	52	-1	2	
R8	4519 South Lane	Flood Plain/Habitat	66	64	-2	69	3	64	-5	-2	
R9	14555 El Camino Real	Polo Grounds	57	61	4	60	3	61	1	4	
R10	2847 Via De La Valle	Animal Pens	52	50	-2	55	3	50	-5	-2	
R11	14710 Via Del Canon	Residential	46	48	2	48	2	48	0	2	
R12	2847 Via De La Valle	Offices	53	54	1	55	2	54	-1	1	
R13	3790 Via De La Valle (Tommy V's)	Commercial	64	62	-2	68	4	62	-6	-2	
R14	3665 Via De La Valle (All Creatures Pets	Commercial	62	65	3	65	3	65	0	3	
	Hospital)										
R15	3675 Via De La Valle (Mary's Tack and Feed)	Commercial	67	70	3	70	3	70	0	3	
R16	3702 Via De La Valle (Market Bar and Grill)	Commercial	63	64	1	66	3	64	-2	1	
R17	14820 De La Valle Place	Residential	53	55	2	56	3	55	-1	2	
R18	14841 De La Valle Place	Residential	49	51	2	52	3	51	-1	2	
R19	14841 De La Valle Place	Residential	51	51	0	54	3	51	-3	0	
R20	14801 Fisher CV	Residential	49	49	0	53	4	49	-4	0	
R21	3840 Via De La Valle (Gatlin Development)	Commercial	53	52	-1	58	5	52	-6	-1	
R22	14750 El Camino Real (Casa Palmera)	Treatment Facility	56	56	0	61	5	56	-5	0	
R23	14805 Fisher CV	Residential	49	49	0	53	4	49	-4	0	
R24	5005 Rancho Del Madison	Residential	55	55	0	58	3	55	-3	0	
R25	14905 Arroyo Rosita	Residential	54	55	1	57	3	55	-2	1	
Note: Due to	model accuracy noise levels are rounded to the near	rest whole decibel.					•		-		

Table 3.11-11 **Roundabouts Traffic Noise Levels**

Note: Due to model accuracy noise levels are rounded to the nearest whole decibel. Source: Ldn Consulting, Inc. 2013

Central Alignment Alternative Modeling Results. Near-term traffic noise levels under the Central Alignment Alternative would range from 46 to 67 dBA CNEL at all receivers. Noise levels at residential land uses would range from 46 to 55 dBA CNEL and 52 to 58 dBA CNEL at recreational areas. Commercial land uses would be exposed to noise levels ranging from 53 to 67 dBA CNEL. Noise level increases over existing conditions would range between 0 and 2 dBA at all land uses.

Horizon year traffic noise levels under the Central Alignment Alternative would range from 48 to 71 dBA CNEL at all receivers. Traffic noise levels at residential land uses would range from 48 to 59 dBA CNEL and 55 to 61 dBA CNEL at recreational areas. Commercial/office land uses would be exposed to noise levels ranging from 56 to 71 dBA CNEL. Increase in noise levels over existing conditions would range between 2 and 6 dBA at all land uses.

Western Alignment Alternative Modeling Results. Near term traffic noise levels under the Western Alignment Alternative would range from 45 to 68 dBA CNEL at all receivers. Traffic noise levels at residential land uses under the near term conditions would range from 45 to 56 dBA CNEL and 53 to 59 dBA CNEL at recreational uses. Commercial land uses would be exposed to noise levels ranging from 53 to 68 dBA CNEL. Changes in noise levels would range between -1 and 3 dBA at all land uses.

Horizon year traffic noise levels under the Western Alignment Alternative would range from 48 to 71 dBA CNEL at all receivers. Traffic noise levels at residential land uses under the year 2035 conditions would range from 48 to 59 dBA CNEL and 56 to 61 dBA CNEL at recreational uses. Commercial land uses would be exposed to noise levels ranging from 56 to 71 dBA CNEL. Changes in noise levels would range between 2 and 6 dBA at all land uses.

Eastern Alignment Alternative Modeling Results. Near-term traffic noise levels under the Eastern Alignment Alternative would range from 46 to 68 dBA CNEL at all receivers. Traffic noise levels at residential land uses would range from 46 to 56 dBA CNEL and 55 to 63 dBA CNEL at recreational uses. Commercial land uses would be exposed to noise levels ranging from 52 to 68 dBA CNEL. Changes in noise levels would range between -4 and 6 dBA at all land uses.

Horizon Year traffic noise levels under the Eastern Alignment Alternative would range from 49 to 71 dBA CNEL at all receivers. Traffic noise levels at residential land uses would range from 49 to 59 dBA CNEL and 58 to 66 dBA CNEL at recreational uses. Commercial land uses would be exposed to noise levels ranging from 55 to 71 dBA CNEL. Changes in noise levels would range between -1 and 9 dBA at all land uses.

Roundabout Alternative Modeling Results. Near term traffic noise levels under the Roundabout Alternative would range from 48 to 70 dBA CNEL at all receivers. Traffic noise levels at residential land uses would range from 48 to 56 dBA CNEL and 52 to 61 dBA CNEL at recreational uses. Commercial land uses would be exposed to noise levels ranging from 52 to 70 dBA CNEL. Changes in noise levels would range between -2 and 5 dBA at all land uses.

Horizon Year traffic noise levels under the Roundabouts Alternative would range from 48 to 70 dBA CNEL at all receivers. Traffic noise levels at residential land uses would range from 48 to 56 dBA CNEL and 52 to 61 dBA CNEL at recreational uses. Commercial land uses would be exposed to noise levels ranging from 52 to 70 dBA CNEL. Changes in noise levels would range between -6 and 3 dBA at all land uses.

Central Alignment Alternative Comparison to Thresholds. As shown in Table 3.11-8, noise levels at all residential land uses under either the near term or future conditions would comply with the City's "compatible" noise standard of 60 dBA CNEL for residential uses. Other potentially noise sensitive uses areas would include recreational uses. The maximum CNEL values under the 2035 condition at the golf course would not exceed 61 dBA CNEL; thus, near term and future levels with the proposed project would comply with the City "compatible" standard of 65 dBA CNEL for recreational land uses. Similarly, noise levels at the polo field would not exceed the City's "compatible" standard of 65 dBA CNEL for recreational land uses.

R22 is a medical treatment facility and may house patients. Noise levels under the 2035 conditions would be 62 dBA CNEL. This noise level would exceed the City's "compatible" noise standard for care facilities, however, the attenuation for exterior sources to interior locations provided by modern commercial structures is approximately 25 dBA. Thus, with an exterior noise level of 62 dBA CNEL, interior noise levels would attenuate to 37 dBA CNEL, and interior noise levels would comply with City standards.

Three affected commercial uses, represented by R14, R15, and R21, are located within the City limits. Noise levels at R14 and R21 are equal to, or less than, 65 dBA CNEL under the existing plus project and future conditions. These noise levels would comply with the City's "compatible" standard of 65 dBA CNEL for commercial uses. Receiver R15 would be exposed to noise levels of 71 dBA CNEL under near-term and future conditions. These noise levels would exceed the City's "compatible" standard for sales uses, however, as with the medical treatment facility, the structure would provide 25 dBA attenuation from exterior sources. Thus, the interior noise level is anticipated to be approximately 46 dBA CNEL and interior noise levels would comply with City standards. Noise level increases within the City after implementation of the proposed project would comply with the City standards.

Noise levels at residential receptors in the County in the near term and future condition would comply with the County's noise compatibility standard of 60 dBA CNEL. Affected commercial uses, represented by R13 and R16, are located within the County of San Diego. Noise levels at these uses would reach up to 69 dBA CNEL under the existing plus project and future conditions. The County noise compatibility standard for commercial uses is 70 dBA CNEL, so the future noise levels would comply with the County noise compatibility standards. Noise level increases within the County after implementation of the proposed project would comply with the County standards.

Western Alignment Alternative Comparison to Thresholds. As shown in Table 3.11-9, noise levels at all residential land uses in the near term and future condition would comply with the City's noise compatibility standard of 60 dBA CNEL for residential uses. Maximum CNEL values under the 2035 condition at the golf course would not exceed 61 dBA CNEL; thus, near term and future levels with the proposed project would comply with the City standard of 65 dBA CNEL for golf courses. Similarly, noise levels at the polo field would be 60 dBA CNEL, which would not exceed the City standard of 65 dBA CNEL.

R22 is a medical treatment facility and may house patients; noise levels under the future conditions would be 62 dBA CNEL. While this noise level would exceed the City exterior noise standard for medical facilities, as discussed under the Central Alignment Alternative, the structure would provide approximately 25 dBA attenuation; thus, the interior noise level would comply with the City standards.

Noise levels at commercial receptors R14 and R21 would not exceed to 65 dBA CNEL under the existing plus project or future conditions. These noise levels would comply with the City's noise standards for commercial uses. Commercial receptor R15 would be exposed to noise levels of approximately 71 dBA CNEL under the future conditions, which would exceed the City's standard of 65 dBA CNEL for sales uses. However, as previously discussed, the structure would provide approximately 25 dBA of noise level reduction at interior locations from exterior noise sources. Therefore, the interior noise levels would be approximately 46 dBA CNEL, which would comply with City standards. Noise level increases within the City after implementation of the proposed project would comply with the City standards.

Noise levels at residential receptors in the County in near term and future conditions would comply with the County's noise compatibility standard of 60 dBA CNEL. Commercial uses, represented by R13 and R16, located within the County, would comply with the County's standard of 70 dBA CNEL for commercial retail uses. Noise level increases within the County after implementation of the proposed project would comply with the County standards.

Eastern Alignment Alternative Comparison to Thresholds. As shown in Table 3.11-10, noise levels at all residential land uses would comply with the City's noise compatible standard of 60 dBA CNEL for residential uses. Maximum CNEL values under the future condition at the golf course would comply with the City standard of 65 dBA CNEL for golf courses. Noise levels at the polo field and horse park would be approximately 66 dBA CNEL, which would exceed the City standard of 65 dBA CNEL for recreational uses. However, the exceedance is primarily due to the proximity of the receiver to the roadway, as the roadway would be moved partially onto the existing polo field and does not include the majority of the area. Additionally, the movement of the roadway would require reconfiguration of the polo field or uses in the area at the time. Therefore, during reconfiguration, the City will verify that recreational areas are located such that they are exposed to noise levels equal to or less than 65 dBA CNEL.

R22 is a medical treatment facility and may house patients; noise levels under the future build condition would be 64 dBA CNEL. This noise level is compatible with the City's noise standard.

Noise levels at commercial receptors R14 and R21 would comply with the City's exterior noise compatibility standard of 65 dBA CNEL. Noise levels at commercial receptor R15 could reach up to 68 dBA CNEL under the existing plus project conditions and 71 dBA CNEL under the future conditions. These noise levels would exceed the City's exterior noise standard of 65 dBA CNEL for commercial sales uses. However, as previously discussed, the structure would provide approximately 25 dBA of noise level reduction at interior locations from exterior noise sources. Therefore, the interior noise levels would be approximately 46 dBA CNEL, which would comply with City's interior noise standards. Noise level increases within the City after implementation of the proposed project would comply with the City standards.

Noise levels at residential receptors in the County in near term and future condition would comply with the County's noise compatibility standard of 60 dBA CNEL. Noise levels at commercial receptors R13 and R16 would reach up to 67 dBA CNEL under the existing plus project conditions, and 70 dBA CNEL under the future conditions. These noise levels would comply with the County's standard of 70 dBA CNEL for commercial retail uses. Noise level increases within the County after implementation of the proposed project would comply with the County standards.

Roundabouts Alternative Comparison to Thresholds. As shown in Table 3.11-11, noise levels at all residential land uses in the near term and future conditions would comply with the City's

noise compatibility standard of 60 dBA CNEL for residential uses. Maximum CNEL values under the future condition at the golf course would not exceed 60 dBA CNEL; thus, near term and future levels with the proposed project would comply with the City standard of 65 dBA CNEL for golf courses. Similarly, noise levels at the polo field and horse park would not exceed the City standard of 65 dBA CNEL.

R22 is a medical treatment facility and may house patients; noise levels under the future build condition would be 56 dBA CNEL. This noise level is compatible with the City's noise standard.

Noise levels at commercial receptors R12, R14, and R21 would not exceed 65 dBA CNEL, which would be compatible with City standards. Noise levels at commercial receptor R15 would reach up to 70 dBA CNEL under the existing plus project conditions and the future conditions. These noise levels would exceed the City's exterior noise standard of 65 dBA CNEL for commercial sales uses. However, as previously discussed, the structure would provide approximately 25 dBA of noise level reduction at interior locations from exterior noise sources. Therefore, the interior noise levels would be approximately 45 dBA CNEL, which would comply with City standards. Noise level increases within the City after implementation of the proposed project would comply with the City standards.

Noise levels at residential receptors in the County in the near term and future conditions would comply with the County's noise compatibility standard of 60 dBA CNEL. Noise levels at commercial receptors R13 and R16 would reach up to 64 dBA CNEL under the existing plus project conditions and under future conditions. These noise levels would comply with the County's standard of 70 dBA CNEL for commercial retail uses Noise level increases within the County after implementation of the proposed project would comply with the County standards.

3.11.3.2 Issue 1b: Impacts of Noise during Construction

For purposes of noise assessment, construction equipment can be considered to operate in two modes: stationary and mobile. Stationary equipment operates in one location for 1 or more days at a time with either a fixed-power operation, such as pumps, generators, and compressors, or a variable noise operation, such as pile drivers, rock drills, and pavement breakers. Mobile equipment moves around the construction site with power applied in a cyclic fashion, such as bulldozers, graders, and loaders (FTA 2006). Noise impacts from stationary equipment are assessed from the center of the equipment, while noise impacts for mobile construction equipment are assessed from the center of the equipment activity or construction site. For linear construction, such as a roadway or pipeline, construction noise is assessed from the centerline of the alignment and center of the active work area.

Variation in power imposes additional complexity in characterizing the noise source level from construction equipment. Power variation is accounted for by describing the noise at a reference distance from the equipment operating at full power and adjusting it based on the duty cycle of the activity to determine the L_{eq} of the operation (FTA 2006). Typical duty cycles and noise levels generated by representative pieces of equipment are listed in Table 3.11-12.

Each phase of construction has a specific equipment mix, depending on the work to be accomplished during that phase. Each phase also has its own noise characteristics; some will have higher continuous noise levels than others, and some have high-impact noise levels. The L_{eq} of each phase is determined by combining the L_{eq} contributions from each piece of equipment used in that phase (FTA 2006). In typical construction projects, grading activities typically generate the highest noise levels, as grading involves the largest equipment.

Equipment	Noise Level at 50 Feet	Typical Duty Cycle
Auger Drill Rig	85	20%
Backhoe	80	40%
Blasting	94	1%
Chain Saw	85	20%
Clam Shovel	93	20%
Compactor (ground)	80	20%
Compressor (air)	80	40%
Concrete Mixer Truck	85	40%
Concrete Pump	82	20%
Concrete Saw	90	20%
Crane (mobile or stationary)	85	20%
Dozer	85	40%
Dump Truck	84	40%
Excavator	85	40%
Front End Loader	80	40%
Generator (25 KVA or less)	70	50%
Generator (more than 25 KVA)	82	50%
Grader	85	40%
Hydra Break Ram	90	10%
Impact Pile Driver (diesel or drop)	95	20%
Insitu Soil Sampling Rig	84	20%
Jackhammer	85	20%
Mounted Impact Hammer (hoe ram)	90	20%
Paver	85	50%
Pneumatic Tools	85	50%
Pumps	77	50%
Rock Drill	85	20%
Scraper	85	40%
Tractor	84	40%
Vacuum Excavator (vac-truck)	85	40%
Vibratory Concrete Mixer	80	20%
Vibratory Pile Driver	95	20%

Table 3.11-12Typical Construction Noise Levels

Source: Thalheimer 2000; Ldn Consulting, Inc. 2013

KVA = kilovolt amps

Construction noise would be generated by diesel engine-driven construction equipment, which would be used for site preparation; excavation and grading; delivery and application of fill; subgrade, asphalt, and concrete material; and installation of medians, barriers, signage, etc. Diesel engine-driven trucks would bring materials to the site and remove spoils from excavation. Peak noise levels may be 85 to 90 dBA at a distance of 50 feet during most construction activities, and hourly average noise levels at 50 feet from the edge of the work area would be anticipated to be 70 to 80 dBA L_{eq} .

Construction of the bridge is likely to concentrate a number of pieces of equipment in a relatively small area. Therefore, a source noise level of 86 dBA L_{eq} at 50 feet at the bridge area is considered appropriate (FHWA 2004). Average noise levels over longer periods of time would be less. Construction equipment noise is considered to be a "point source" and attenuated over distance over hard surfaces at a rate of 6 dBA for each doubling of distance. Thus, a noise level of 80 dBA at 50 feet would be 74 dBA at 100 feet and 68 dBA at 200 feet from the source. Noise attenuation would be greater over soft, absorbent surfaces, such as grass, with the reduction of noise up to 7.5 dBA for each doubling of distance (FTA 2006).

The nearest sensitive receptors to the work areas are the rear of the home at 14841 De La Valle Place, behind the Polo Plaza (R18), and the residence on San Dieguito Road (R2). R18 is approximately 250 feet from the planned construction area. An existing wall prevents a direct line of sight from R18 to Via de la Valle and provides additional noise attenuation. Hourly noise levels would be approximately 66 dBA L_{eq} , and maximum noise levels would not be anticipated to exceed 76 dBA L_{max} . For many operations, the existing wall would break the line of sight, the noise reduction would be greater, and the noise levels at the residence would be less than the indicated maximum values.

R2 is approximately 100 feet from the planned widening area. Existing structures prevent a direct line of sight from R2 to San Dieguito Road. In the back yard, hourly average noise levels would be approximately 64 dBA L_{eq} and maximum noise levels would be approximately 74 dBA L_{max} . While the front of the residence would be directly exposed to the construction, hourly average noise levels are not anticipated to exceed 74 dBA L_{eq} and maximum noise levels would be approximately 84 dBA L_{max} . Additionally, construction equipment noise would be heard above the normal traffic noise at all of the businesses and recreation areas adjacent to the project roadways; however, neither the noise level limits of the City nor County noise ordinances would be exceeded.

R2 and R18 are located at the south and north ends of the project area. Construction at the these locations, and the associated noise, would occur for short durations while the majority of the construction work would occur at greater distances along El Camino Real with lower noise levels than those discussed above.

No nighttime construction is anticipated on this project. Therefore, no nighttime active construction noise would be expected. Nighttime impacts can occur if warning signs or traffic control devices driven by internal combustion engines are operating near sensitive receptors. Construction noise impacts can also occur from staging areas or engine-driven warning devices. Even when construction is not anticipated to occur during nighttime hours, signs or signals are often required during all hours to warn drivers of open trenches or other hazards. If these devices are powered by internal combustion engines, they can be a source of nuisance noise and can cause adverse impacts. The following permit conditions would be incorporated into the project plans and specifications as project features to minimize the impacts of construction noise.

1. Each internal combustion engine should be equipped with a muffler of a type recommended by the manufacturer. No internal combustion engine should be operated on the project without said muffler.

Noise

- 2. Staging areas should be located at least 500 feet from occupied residential units. Work in staging areas that generates loud noises, such as equipment maintenance, should not occur during the hours prohibited for construction work.
- 3. If traffic control and construction signs that require power for lighting or flashing are located near residential units, the source of power should be batteries, solar cells, or another quiet source. Gas- or diesel-fueled internal combustion engines should not be used.
- 4. Project specifications will restrict pile driving, and, although not anticipated to be needed for this project, explosives blasting to the hours of 7:00 A.M.to 7:00 P.M., Monday through Friday, and will not allow these activities on Saturdays, Sundays, or holidays.
- 5. The following measures incorporated into the project related to construction noise are discussed in more detail in Section 3.12.

Construction activities should be avoided during the nesting/breeding season where possible. Should it be necessary to conduct grading or other construction activities during the bird breeding season, a preconstruction nesting survey of all areas would be required by a certified biologist. If the Biological Monitor has determined that there are sensitive bird nests within 300 feet of the proposed activity, the following recommendations would apply: An approved acoustical consultant shall perform noise measurements to assess the ambient noise levels in the absence of construction activities. The intent of these measurements is to establish baseline noise levels in the occupied habitat without construction. If the construction noise levels at nest sites during the breeding season are anticipated to exceed the 60 dBA Leq or ambient condition, whichever is higher, noise attenuation measures including, but not limited to, noise barriers and noise reducing features on construction equipment shall be implemented as necessary to maintain construction noise at acceptable levels at nest sites. The biological mitigation plan, if needed, should also include noise monitoring prior to and during the beginning of the nesting/breeding season in coordination with the Project's Biologist and City to ensure compliance with applicable standards.

3.11.4 Significance of Noise Impacts under CEQA

3.11.4.1 CEQA Significance Thresholds

As discussed in Section 3.11.1.2, the following excerpts taken from the City of San Diego Significance Determination Thresholds (City of San Diego 2011) are used to determine a potential threshold at which noise levels would be considered significant under CEQA.

Temporary Construction Noise

Temporary construction noise, which exceeds 75 dBA L_{eq} at a sensitive receptor, would be considered significant. Construction noise levels measured at or beyond the property lines of any property zoned residential shall not exceed an average sound level greater than 75 dB during the 12-hour period from 7:00 A.M. to 7:00 P.M. In addition, construction activity is prohibited between the hours of 7:00 P.M. of any day and 7:00 A.M. of the following day, or on legal

holidays as specified in Section 21.04 of the San Diego Municipal Code, with the exception of Columbus Day and Washington's Birthday, or on Sundays, that would create disturbing, excessive, or offensive noise unless a permit has been applied for and granted beforehand by the noise Abatement and Control Administrator, in conformance with San Diego Municipal Code Section 59.5.0404. Additionally, where temporary construction noise would substantially interfere with normal business communication, or affect sensitive receptors, such as day care facilities, a significant noise impact may be identified.

Traffic Noise

1. <u>All residential (single-family and multi-family)</u>, office, and other noise sensitive land uses which include schools, libraries, hospitals, day care, convalescent homes, hotels, motels and parks.

Exterior noise levels would be considered significant if projected traffic forecasts (year 2035) would result in noise levels exceeding 65 dBA CNEL at exterior usable areas (does not include residential front yards or balconies, unless the balconies are part of the usable open space calculation for multi-family units).

2. Commercial, Retail, Industrial, and Outdoor Spectator Sports Uses.

Traffic noise levels for these uses would be considered significant if they exceed 75 dBA CNEL at outdoor usable areas.

3.11.4.2 Determination of Significance under CEQA

The conclusions of significance under CEQA for the alternatives analyzed are summarized in Table 3.11-13.

Construction

Construction noise levels at sensitive receptors would not exceed 75 dBA L_{eq} , nor would noise levels substantially interfere with the operations of nearby businesses or sensitive receptors. Noise impacts would be less than significant.

<u>Traffic</u>

Projected traffic noise levels at the residential, recreational, and commercial receptors in the area would not exceed the City or County thresholds for noise/land use compatibility, as discussed above. Traffic noise impacts would be less than significant.

Impact	Threshold	Central	Road	Bicycle	Western	Eastern	Round-	Lower	No
			Capacity	Safety			about	Elevation	Build
Long-term	Exceeds	NS	NS	NS	NS	NS	NS	NS	NS
Operation	City or								
	County								
	thresholds								
Short-term	Exceeds 75	NS	NS	NS	NS	NS	NS	NS	NS
Construction	dBA Leq at								
	sensitive								
	receptors								

 Table 3.11-13

 Summary of CEQA Significance for Noise Impacts

NS = Not significant

SM = Significant and mitigable to below a level of significance

SU = Significant and unmitigable

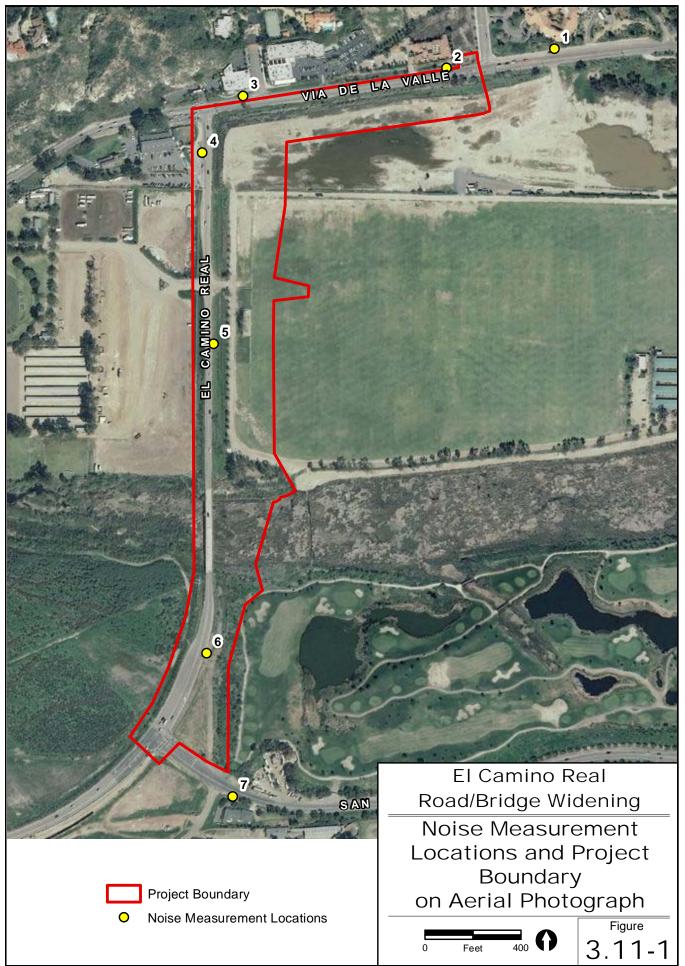
3.11.5 Mitigation Measures

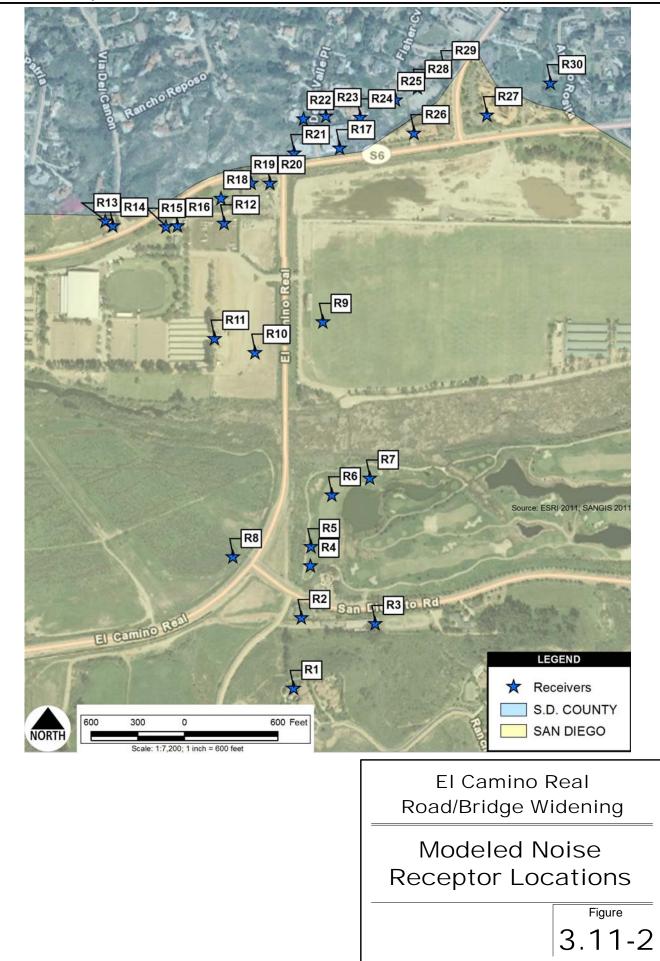
No impacts would be significant under CEQA. No mitigation measures are necessary for any of the build alternatives.

3.11.6 Significant and Unmitigable Impacts under CEQA

No unmitigable impacts would occur for the build alternatives.

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3.12 BIOLOGICAL RESOURCES

This section evaluates the impacts of the proposed project on biological resources in the study area. Information presented here is based on the Natural Environment Study (NES) (ICF/Nordby 2015) prepared pursuant to Caltrans guidelines to support the separate Environmental Analysis (EA) for the project. The NES is also intended to support the Environmental Impact Report (EIR) and meet City of San Diego requirements pursuant to the City of San Diego Land Development Code, Biology Guidelines (City of San Diego 2002). The 2002 guidelines are appropriate as the project has been deemed "substantially complete" by the City as of April 25, 2002 based on earlier versions of the NES that were prepared by Tierra Environmental Services (Tierra) in 2006 and updated in 2009. The NES is incorporated into this EIR by reference and is available for inspection at the City of San Diego Development Services Department.

The NES describes the existing biological environment and contains the technical analysis that lends support to environmental documentation concerning how plants, wildlife, and natural communities may be affected by the project. The NES also includes an analysis of a parcel owned by the San Dieguito River Park Joint Powers Authority (JPA), which is the proposed mitigation site for the project.

Four of the build alternatives are addressed in detail in the NES: Central Alignment, Western Alignment, Eastern Alignment, and Roundabout. The footprint for the Lower Elevation Alternative is essentially the same as for the Central Alignment Alternative; therefore, these two alignment alternatives are grouped in the discussion of biological resources impacts. The footprints of the Road Capacity and Bicycle Safety alternatives are the same, so these two narrow roadway alignment alternatives are grouped together in this section of the recirculated EIR. As noted in Section 2.2 of this EIR, the two alternatives with the "narrow roadway" cross section (Road Capacity Alternative and the Bicycle Safety Alternative) are not considered viable by California Department of Transportation (Caltrans)/Federal Highway Administration (FHWA) because they do not provide all features needed to completely meet the purpose and need. Consequently, these two alternatives are not analyzed in the EA or the NES. However, as in other sections in this recirculated EIR, supplementary information has been developed to allow evaluation of the two narrow roadway alternatives in comparison to the other build alternatives. In addition, Appendix H of the NES addresses the narrow cross section alternatives as part of providing a biology guidelines consistency summary for the City that presents supplemental information required by the City.

3.12.1 Methodology and Regulatory Setting

3.12.1.1 Methodology

Description of Project and Mitigation Areas. The general Biological Study Area (BSA) established for this project is defined as the combined limits of disturbance from the project alternatives as well as proposed staging areas and the JPA Mitigation Site, as described below.

<u>Project Areas</u>. The project impact area includes areas permanently covered by project features (e.g., the bridge, manufactured slopes, sidewalks), referred to as the permanent footprint in this section on biological resources impacts. Temporary construction and staging areas would be disturbed only during project construction, as also discussed below.

Construction areas would result in temporary impacts which would be restored to their original condition and/or revegetated following project completion. In addition, temporary impacts are considered the same as permanent impacts when calculating mitigation requirements due to the extended construction period for the project and the requirements of the City's Biology Guidelines; therefore, onsite revegetation of the construction corridors would not count as mitigation for the project's impacts to sensitive biological resources, and mitigation for these areas would occur via purchase of Cornerstone Land Mitigation Bank credits using City required habitat tiers and mitigation ratios. Construction access would be obtained through areas already considered impacted by the proposed project (i.e., the permanent footprint or construction corridor). Thus, access roads are not considered separately from other project features.

<u>Special Project Areas</u>. A portion of the BSA occurs within the Rancho Del Mar property, which is located south of Via de la Valle, north of the polo fields, and east of El Camino Real. The property owner did not grant the City access into this area. No studies were conducted within the Rancho Del Mar property.

A small portion of the proposed mitigation site for the constructed Fairbanks Ranch Project occurs within the BSA. However, because this project's mitigation effort was never implemented, impacts to tThese areas are-were not originally assessed as impacts to a mitigation site but are called out separately in the NES. The mitigation site was originally considered asconsists of two areas situated beneath the bridge. One of the sites occurs on the south bank of the river and encompasses 0.1 acre, and the other occurs on the north bank of the river and encompasses 0.4 acre. This project's mitigation effort was implemented within the banks of the river in the 1980s but not required to be maintained in perpetuity. It is now understood that the Fairbanks Ranch mitigation area will undergo invasive species removal for a stretch of the San Dieguito River. The portion of the Fairbanks Ranch mitigation area within the road/bridge footprint for the Eastern Alignment, the City's Preferred Alternative, totals 1.7 acres. Therefore, Section 6.0, Mitigation Monitoring and Reporting Program, includes calculations in anticipation of the proposed project.

<u>Staging Areas</u>. As described in Section 2.2.12 of this recirculated EIR, staging areas could include a combination of privately-owned parcels and City-owned land, including two areas located west of El Camino Real to the north and south of San Dieguito Road. These areas are undeveloped and have been previously used as staging areas for other projects in the area. Staging activities would be limited to areas of disturbed land, with a small patch of Diegan coastal sage scrub to be fenced and avoided during construction. An unpaved parking area situated north of the river and west of El Camino Real could be used as an additional staging area for activities occurring north of the river. Use of staging areas would not result in additional impacts to sensitive biological resources. Upon completion of construction, the disturbed parts of the staging area would be cleared, re-graded to match existing conditions, and, where appropriate, hydroseeded with the approved upland native plant palette. It is anticipated that the privately owned parcel will not be seeded with native plant species.

<u>JPA Mitigation Site</u>. Impacts to wetlands would occur from all of the alternatives. Mitigation for impacts (both permanent and temporary) to wetlands resulting from the project would be accomplished primarily through wetland creation/enhancement on a parcel owned by the JPA (JPA Mitigation Site). This parcel is located west of El Camino Real and south of the San Dieguito River. Historically, this area has supported agricultural practices but has remained

fallow for several years. This area has revegetated naturally and currently supports native and nonnative vegetation.

A conceptual restoration plan has been developed for the project based on impacts to sensitive habitats associated with all alternatives and is presented as an introduction to the City's proposed The conceptual restoration plan is depicted in Figure 3.12-1 of this mitigation strategy. recirculated EIR. It is described in Appendix K of the NES and summarized in this section of the recirculated EIR. The plan has been designed to accommodate mitigation for impacts to all wetland habitats, both temporary and permanent, incurred by construction of the new bridge/roadways and demolition of the existing bridge. In the proposed plan, wetland impacts would be mitigated through enhancement or creation of wetland habitats at ratios ranging from 1:1 to 4:1 as partially dictated by City of San Diego mitigation guidelines (City of San Diego 2002) and through agreements by the resource agencies that degraded wetlands can be restored to high quality wetlands on the JPA Mitigation Site and used to mitigate project wetland impacts, at a 1:1 ratio. Overall wetland mitigation would be provided at higher Coastal Overlay Zone mitigation ratios whether or not the impacts occur within the Coastal Overlay Zone. Mitigation is proposed at ratios exceeding City of San Diego guidelines due to the sensitive habitats and species within the project area and extended construction timeline. All impacts are considered permanent in terms of mitigation requirements and will be mitigated at the highest required City ratios or greater due to temporal loss of habitat function during the construction period.

Mitigation for impacts to 14.77 - 15.25 ac(depending on alternative) of sensitive upland habitats converted to wetlands on the JPA Mitigation Site would be provided (using appropriate tiers and ratios) through purchase of credits from the City's Cornerstone Lands Mitigation Bank (considered within the MHPA). This mitigation strategy allows for replacement of the current upland habitat when it is converted to primarily high quality wetland habitat Detailed discussion of impacts and required mitigation is presented by habitat in Chapter 4 of the NES. Detailed discussion of the City's mitigation are summarized in this recirculated EIR in Sections 3.12.3 and 3.12.5, respectively.

On the mitigation site, a protective berm would extend parallel to the San Dieguito River that would prevent sediment deposition and scour during high flow events. An opening at the western extent of the berm would provide hydrological connection with the river. The berm would extend east–west from the existing bridge abutment and would be open on the western end. It would have a 10-foot-wide top, a height of 7 to 10 feet above the current ground level, and would be constructed at a 3:1 slope on both the channel side of the berm and the slope facing the mitigation area. An armored weir would be constructed within the berm and would be approximately 7 feet lower than the top of the berm. The weir would be approximately 250 feet long and would allow flows from the river to flow through the mitigation area during large flood events while excluding bed load sediment. During minor flood flows, the majority of water from the river would be deflected away from the mitigation area and remain in the river channel.

The primary feature of the proposed mitigation plan is the creation of approximately 15.4 acres of coastal freshwater marsh as mitigation for impacts to existing freshwater marsh and existing disturbed coastal salt marsh. This habitat would be created to compliment the freshwater marsh habitat in the San Dieguito River that is currently occupied by the federally-listed endangered and state-listed endangered and Fully Protected Species light-footed clapper rail (*Rallus longirostris levipes*), recently renamed the light-footed Ridgway rail (*Rallus obsoletus levipes*) by the American Ornithologists Union, which would be impacted during construction/demolition. The two names are used interchangeably in this EIR. This proposed restoration would include

mitigation for impacts to freshwater marsh and coastal salt marsh incurred by the project, resulting in a portion of the overall mitigation that is out-of-kind. The rationale for this proposed out-of-kind mitigation is:

- The disturbed coastal salt marsh habitat that would be impacted by the project is of very low quality having been used for years as a parking lot for various events and other activities.
- There is little or no current opportunity for coastal salt marsh creation within the watershed as a result of two large-scale restoration projects in the tidally-influenced areas of San Dieguito Lagoon immediately west of the El Camino Real bridge. These include the approximately 115-acre restoration recently constructed by Southern California Edison as mitigation for impacts associated with the operation of San Onofre Nuclear Generating Station and the approximately 127-acre San Dieguito Lagoon W19 Restoration Project currently being developed by the San Diego Association of Governments (SANDAG).
- Freshwater marsh habitat in the project area appears to be favored by the clapper rail despite their typical preference for low, cordgrass-dominated salt marsh habitat. As presented in Chapter 4 of the NES, the population of clapper rails utilizing the freshwater marsh habitats of the San Dieguito River in the project area and upstream for approximately 1 mile is the third largest population of this species in California with an estimated 45 paired and unpaired individual rails (Zembal and Hoffman 2012). Figure 3.12-6 displays the location of observations in relation to the proposed alignments of the build alternatives.
- Impacts to other wetland habitats, including southern willow scrub, mulefat scrub and disturbed wetlands would be mitigated through enhancement/creation of similar habitats in excess of City mitigation requirements.

Through creation and enhancement of freshwater marsh and riparian habitats, the conceptual restoration plan would significantly benefit the clapper rail by:

- Improving water quality and habitat value through the restoration of agricultural land;
- Increasing native cover and protection around breeding areas;
- Removing invasive plant species within and adjacent to the riparian corridor;
- Replanting with native riparian species where exotic species are removed; and
- Creating new breeding and foraging habitat.

The area proposed for creation of freshwater marsh habitat is located adjacent to similar existing habitat in the San Dieguito River. Based on salinity measurements of the ground water in the area, it is not anticipated that the habitats proposed as mitigation would convert to other habitats, such as salt marsh. In addition to habitat-based mitigation, measures to minimize direct and indirect impacts to sensitive wildlife species including the light-footed clapper rail and federal-and state listed endangered least Bell's vireo (*Vireo bellii pusillus*) would be implemented during construction. These are presented by species in Chapter 4 of the NES and summarized in Section 3.12.5 of this recirculated EIR.

Mitigation for Project impacts to wetland habitats associated with the Central, Western, and Eastern Alignment alternatives and both narrow cross section alternatives can be accomplished in their entirety on the JPA mitigation site.

Mitigation for the Roundabout Alternative will require the entire JPA mitigation site plus additional lands. Mitigation for the Roundabout Alternative impacts to 6.4353 ac of wetlands from road and bridge improvement at City ratios would require creation of 24.6672 ac of wetland habitat. This exceeds the capacity of the proposed JPA mitigation area. An additional 2.11 ac of wetland habitat will be impacted at the JPA site for a total wetland mitigation burden of 26.8872 ac. Impacts to sensitive upland habitats, including 0.787 ac of disturbed Diegan coastal sage scrub associated with road and bridge improvement and 14.33 ac disturbed Diegan coastal sage scrub habitats associated with the JPA mitigation site, will be mitigated through purchase of credits from the City's Cornerstone Lands. The Roundabout Alternative would require an additional 6.48 acres of wetland mitigation beyond the JPA mitigation site. The City of San Diego owns a parcel in Gonzales Canyon immediately south of the JPA site and south of El Camino Real that is considered suitable for wetland mitigation, through a combination of creation and enhancement on up to 10.8 acres. A Memorandum of Understanding is in process should it become necessary to proceed with this alternative. Details on this additional wetland creation and enhancement are presented in Chapter 4 of the NES.

In April 2014, SANDAG solicited the resource agencies (including California Department of Fish and Wildlife (CDFW), U.S. Fish and Wildlife Service (USFWS), U.S. Army Corps of Engineers (USACE), Regional Water Quality Control Board (RWQCB), and the California Coastal Commission (CCC)), to allow restoration of existing, degraded wetland habitats to higher quality wetlands to count as mitigation for North Coast Corridor project wetland impacts using a 1:1 ratio. In a series of emails dated May 2014, all resource agencies agreed and although the North Coast Corridor is a separate project; this same 1:1 ratio mitigation strategy is being applied to this project for the reasons outlined below. The City is currently coordinating with SANDAG and Caltrans to incorporate the JPA mitigation area into a larger scale restoration effort that includes mitigation for the North Coast Corridor. Given the coordination for the overall restoration in this area, it was determined that the same wetland mitigation approach on the JPA Mitigation Site is being conducted by SANDAG in association with the City of San Diego under a memorandum of agreement.

Field Studies. Various surveys have been conducted in support of this project over the years in advance of the original 2006 EIR and in preparation for this recirculated EIR.

A series of field studies were conducted in 2009 including the following:

- Vegetation mapping,
- Focused surveys for the least Bell's vireo,
- Special-status plant surveys,
- Formal jurisdictional delineation,
- Habitat assessment for bats,
- Habitat assessment for the Belding's savannah sparrow (*Passerculus sandwichensis beldingi*), and
- Habitat assessment for the southwestern willow flycatcher (*Empidonax traillii extimus*).

The general BSA was used for mapping of vegetation communities, special-status plant surveys, the formal jurisdictional delineation, and for the habitat assessment for Belding's savannah sparrow and southwestern willow flycatcher. More specific BSAs were established for the habitat assessment for bats and for focused surveys for least Bell's vireo. The BSA for the bat habitat assessment included the existing bridge and vegetation in the immediate vicinity. The

BSA for focused surveys for least Bell's vireo included riparian scrub vegetation within 500 feet of the existing bridge.

In 2011 it was deemed necessary that the following studies be updated:

- Vegetation mapping,
- Habitat assessment for special-status plants,
- Habitat assessment for bats,
- Habitat assessment for the Belding's savannah sparrow,
- Habitat assessment for the southwestern willow flycatcher, and
- Formal jurisdictional delineation.

According to the NES prepared in 2006 (Tierra 2006), coordination with the City, USFWS, and CDFW, determined that updated light-footed clapper rail surveys and updated arroyo toad (*Anaxyrus* (=*Bufo*) californicus) surveys/habitat assessments were not required. Annual surveys of the light-footed clapper rail are conducted by CDFW for the San Dieguito River, including upstream and downstream of the El Camino Real Bridge. Thus, sufficient data has been collected for the population of light-footed clapper rail inhabiting areas in the vicinity of El Camino Real and additional surveys were not deemed necessary. Focused surveys for arroyo toad conducted in 1998 and 1999 determined that conditions on site are not considered suitable for this species. Furthermore, as stated in the 2006 NES, in 2004 the USFWS confirmed that additional arroyo toad surveys would not be required for this project.

Updated focused surveys for least Bell's vireo were not required because the NES considers all areas of suitable disturbed southern willow scrub as being occupied by this species. However, focused surveys for least Bell's vireo were conducted by Nordby Biological Consulting April – July 2012 for the San Dieguito Lagoon W19 Restoration Project, which includes the JPA Mitigation Site proposed for this project. Those surveys were conducted approximately 500 feet east and west of the El Camino Real Bridge in suitable habitat associated with the San Dieguito River and are thus applicable to the project studies. The results of those surveys were negative or positive and are presented in their entirety in Appendix F of the NES.

In 2013, the W19 restoration project, which includes the proposed JPA Mitigation Site for the El Camino Real Bridge/Road Widening Project, undertook the following updates:

- Vegetation mapping of the W19 parcel, including the proposed JPA Mitigation Site, conducted July 2013;
- Delineation of all federal and state wetlands of the W19 parcel, including the proposed JPA Mitigation Site for the El Camino Real Bridge/Road Widening Project, conducted July 2013;
- Rare plant surveys of the W19 parcel, including the proposed JPA Mitigation Site for the El Camino Real Bridge/Road Widening Project; conducted March – September 2013.

The results of those surveys have been incorporated into the NES. Vegetation communities and jurisdictional delineations within the JPA Mitigation Site supersede those conducted previously by ICF for the JPA Mitigation Site only.

A list of potentially occurring plant and animal species covered by the City of San Diego's Multiple Species Conservation Program, as well as narrow endemic species is included in Appendix C of the NES.

Vegetation communities were mapped by ICF in 2010 and 2011 within the general BSA in the field on a one-inch equals 200 feet (1:2400) scale aerial photograph of the study area and later digitized into a geographic information system (GIS) coverage using ArcGIS software. Mapping included the entire 55.78-acre BSA, and vegetation communities were categorized using standard Holland classifications (Holland 1986). An updated vegetation survey of the JPA Mitigation Site was conducted by S. Scatolini of Caltrans District 11 and C. Nordby of Nordby Biological Consulting on July 2, 2013. Vegetation communities were mapped in the field on a one-inch equals 200 feet (1:2400) scale aerial photograph of the study area and later digitized into a GIS system coverage using ArcGIS software. Vegetation communities were categorized using Oberbauer's modified Holland classifications (Oberbauer et al. 2008). The new GIS file for the JPA Mitigation Site was then merged with the GIS files for the rest of the BSA by RBF Consulting and the merged files are presented in the NES.

Details regarding studies and surveys for the following species are presented in Chapter 2 of the NES:

- Least Bell's Vireo Focused Surveys
- Special Status Plant Surveys
- Bat Habitat Assessment
- Belding's Savannah Sparrow Habitat Assessment
- Southwestern Willow Flycatcher Habitat Assessment

In addition, Chapter 2 of the NES presents a detailed discussion of jurisdictional delineations of wetlands conducted for the project.

Table 3.12-1 lists survey dates and personnel for the rare plant surveys conducted by staff of AECOM. Table 3.12-2 lists survey dates, times, conditions, and personnel for surveys conducted by staff of ICF. Resumes of Key Personnel are presented in Appendix L of the NES.

Survey Date	Personnel	Survey Number
March 29, 2013	Jonathan Dunn, Fred Sproul, Lance Woolley	1
May 14, 2013	Jonathan Dunn, Lance Woolley	2
May 23, 2013	Fred Sproul, Lance Woolley	2
September 19, 2013	Jonathan Dunn, Fred Sproul, Lance Woolley	3
Courses ICE/Mandhas 20	16	

 Table 3.12-1

 AECOM Rare Plant Survey Dates and Personnel

Source: ICF/Nordby 2015

 Table 3.12-2

 ICF Survey Dates and Weather Conditions

Date	Personnel	Time	Conditions	Survey type
4/17/09	K. Fischer	0720–0755	63–65° F; wind 0–2 miles per hour (mph); 0% cloud cover (cc)	LBV ¹ Survey #1
4/17/09	E. Eidson	0755–1230	63–68° F; wind 0–2 mph; 0% cc	Special-status Plant Survey #1
4/17/09	D. Allen	1100-1200	63–68° F; wind 0–2 mph; 0% cc	Diurnal Bat Roost Survey
4/18/09	M. Alfaro	1500–1600	72° F; wind 0–2 mph; sunny skies	SWFL ² and BSS ³ Habitat Assessment
4/27/09	M. Alfaro	0850–0950	68° F; wind 0–2 mph; 100% cc	LBV Survey #2

Date	Personnel	Time	Conditions	Survey type
5/9/09	M. Alfaro	0810-0920	69° F; wind 0–2 mph; 100% cc	LBV Survey #3
5/19/09	E. Eidson	0845-0945	67° F; wind 0–2 mph; hazy skies	LBV Survey #4
5/19/09	E. Eidson	0945–1200	70° F; wind 0–2 mph; hazy skies	Special-status Plant Survey #2
5/30/09	M. Alfaro	0820-0930	69° F; wind 0–2 mph; 100% cc	LBV Survey #5
6/9/09	K. Fischer	0635-0735	62° F; wind 0–2 mph; 100% cc	LBV Survey #6
6/23/09	E. Eidson	0845-0945	65–68° F; wind 0 mph; 100% cc	LBV Survey #7
7/20/09	E. Eidson	1000-1100	78–80° F; wind 0-5 mph; clear skies	LBV Survey #8
8/21/09	E. Eidson	0945–1245	75–80° F; wind 2–5 mph; hazy skies	Special-status Plant Survey #3
8/25/09	A. Borcher	0800–1600	80–84° F; wind 0–5 mph; clear skies	Jurisdictional Delineation
8/26/09	A. Borcher	0800–1530	79–83° F; wind 0–5 mph; clear skies	Jurisdictional Delineation
1/3/10	E. Eidson	0830–1130	66–70° F; wind 0–5 mph; clear skies	Vegetation Mapping of Roundabout Areas
8/11/11	E. Eidson K. Fischer	0830–1430	70–75° F; wind 0–3 mph; overcast to 50% cc	Update vegetation mapping, Habitat Assessments, Special- status Plant Habitat Assessment
8/16/11	D. Ritenour	1100–1630	65–74° F, wind 0–5 mph, clear skies	Jurisdictional Delineation
8/25/11	D. Allen	1800–2030	79–73° F; wind 0–1 mph; no cloud cover	Nocturnal Bat Habitat Assessment
9/2/11	D. Allen	1100–1215	68° F, wind 1–2 mph; clear skies	Diurnal Bat Habitat Assessment
1/26/12	D. Ritenour	1200-1400	70–74° F, wind 0–5 mph, clear skies	Jurisdictional Delineation of JPA Mitigation Site

 Table 3.12-2

 ICF Survey Dates and Weather Conditions (continued)

 3 BSS = Belding's savannah sparrow

Source: ICF/Nordby 2015

3.12.1.2 Regulatory Setting

This section provides summary background information regarding the applicable federal, state, and local regulations for protecting biological resources that are pertinent to the proposed project and anticipated impacts.

Federal Requirements. Multiple federal laws and agencies are involved in biological resources affected by the project.

<u>Clean Water Act</u>. In 1948, Congress first passed the Federal Water Pollution Control Act. This act was amended in 1972 and became known as the Clean Water Act (CWA), which regulates the discharge of pollutants into the waters of the U.S. Under Section 404, permits need to be obtained from USACE for discharge of dredge or fill material into waters of the U.S. Under

Section 401 of the act, Water Quality Certification from the RWQCB needs to be obtained if there are to be any to impacts to waters of the U.S.

<u>Executive Order 11990 Protection of Wetlands</u>. This order establishes a National policy to avoid adverse impacts to wetlands whenever there is a practicable alternative. Under Executive Order 11990 there can be no net loss of wetlands resulting from the project. On federally funded projects, impacts to wetlands must be identified in the environmental document. Alternatives that avoid wetlands must be considered. If wetland impacts cannot be avoided, then all practicable measures to minimize harm must be included. This must be documented in a specific Wetlands Only Practicable Alternative Finding in the final environmental document. Wetland impacts that cannot be avoided must be mitigated through restoration, creation, or enhancement of existing wetlands at ratios determined by federal resource agencies.

<u>Migratory Bird Treaty Act</u>. The Migratory Bird Treaty Act (MBTA) was enacted in 1918. Its purpose is to prohibit the kill or transport of native migratory birds, or any part, nest, or egg of any such bird unless allowed by another regulation adopted in accordance with the MBTA. There is a list of species that are protected by this act. The nests of birds protected by MBTA likely occur on site.

<u>Fish and Wildlife Coordination Act</u>. This act applies to any federal project where the waters of any stream or other body of water are impounded, diverted, deepened, or otherwise modified. Project proponents are required to consult with USFWS and the appropriate state wildlife agency. These agencies prepare reports and recommendations that document project effects on wildlife and identify measures that may be adopted to prevent loss or damage to wildlife resources. The term wildlife includes both animals and plants. Provisions of the act are implemented through the NEPA process and Section 404 permit process.

<u>Federal Endangered Species Act</u>. The Federal Endangered Species Act (FESA) and subsequent amendments provide guidance for the conservation of endangered and threatened species and the ecosystems upon which they depend. Section 7 requires federal agencies to ensure that actions they authorize, fund, or carry out are not likely to jeopardize the continued existence of threatened or endangered species or result in the destruction or adverse modification of critical habitat for these species. For the proposed project, the USFWS is responsible for administering the FESA. The opinion issued at the conclusion of consultation would include a statement authorizing take that may occur incidental to an otherwise legal activity.

Executive Order 13112 - Invasive Species. On February 3, 1999, President Clinton signed Executive Order 13112 requiring federal agencies to combat the introduction or spread of invasive species in the United States. The order defines invasive species as "any species, including its seeds, eggs, spores, or other biological material capable of propagating that species, that is not native to that ecosystem whose introduction does or is likely to cause economic or environmental harm or harm to human health." FHWA guidance issued August 10, 1999, directs the use of the state's noxious weed list to define the invasive plants that must be considered as part of the NEPA analysis for a proposed project.

State Requirements. Multiple state laws and agencies are involved in biological resources affected by the project.

<u>California Department of Fish and Wildlife Code, Section 1600-1616</u>. Under these sections of the CDFW Code, Caltrans and other agencies are required to notify the CDFW prior to any project that would divert, obstruct, or change the natural flow, bed, channel, or bank of any river, stream, or lake. Preliminary notification and project review generally occur during the

environmental process. When an existing fish or wildlife resource may be substantially adversely affected, CDFW is required to propose reasonable project changes to protect the resource. These modifications are formalized in a Streambed Alteration Agreement that becomes part of the plans, specifications, and bid documents for the project.

<u>California Fully Protected Species</u>. The State of California first began to designate species as "fully protected" prior to the creation of the California Endangered Species Act (CESA). Lists of fully protected species were initially developed to provide protection to those animals that were rare or faced possible extinction, and included fish, mammals, amphibians and reptiles, birds, and mammals. Most fully protected species have since been listed as threatened or endangered under CESA and/or FESA. The regulations that implement the Fully Protected Species Statute (CDFW Code Section 4700) provide that fully protected species may not be taken or possessed at any time. Furthermore, CDFW prohibits any state agency from issuing incidental take permits for fully protected species, except for necessary scientific research.

<u>Porter-Cologne Water Quality Control Act</u>. Under the state Porter-Cologne Water Quality Control Act, the State Water Resources Control Board and regional boards assert jurisdiction over many discharges into "waters of the state." Where resources are subject to both state and federal regulations, Porter-Cologne compliance is coordinated with CWA Section 401 certification.

<u>California Native Plant Protection Act</u>. California's Native Plant Protection Act (NPPA) requires all state agencies to utilize their authority to carry out programs to conserve endangered and rare native plants. Provisions of NPPA prohibit the taking of special-status plants from the wild and require notification of CDFW at least 10 days in advance of any change in land use. This allows CDFW to salvage listed plant species that would otherwise be destroyed. Caltrans is required to conduct botanical inventories and consult with CDFW during project planning to comply with the provisions of this act and sections of CEQA that apply to rare or endangered plants.

<u>California Department of Fish and Wildlife Code Section 3503 and 3503.5</u>. Section 3503 of the California Department of Fish and Wildlife Code makes it unlawful to take, possess, or needlessly destroy the nest or eggs of any bird except as otherwise provided by this code or any regulation made pursuant thereto. Section 3503.5 affords this protection to Falconiformes and Strigiformes in particular.

Local Requirements. The primary local regulatory framework for the project is the City of San Diego Multiple Species Conservation Plan (MSCP).

<u>City of San Diego MSCP</u>. The project lies within the boundaries of the City's MSCP subarea plan area. The MSCP is a conservation program designed to facilitate the implementation of a regional habitat preserve by coordinating project impacts and mitigation while allowing the issuance of "take" permits for sensitive upland species at the local level (City of San Diego 1997). The area from which the final habitat preserve will be assembled from is known as the Multiple Habitat Planning Area (MHPA), and lands within it have been designated for up to 90% conservation. Various jurisdictions, including the City of San Diego, have developed MSCP Subarea plans to establish guidelines for the implementation of their respective preserve areas which are included in the regional MHPA. The proposed project alignment is situated partially within the Northern Area of the MHPA established by the City's MSCP Subarea Plan. A portion the project area situated west of El Camino Real and a portion situated south of El Camino Real and south of San Dieguito Road occur within the MHPA. In addition, habitats occurring west of El Camino Real are situated within the City of San Diego Coastal Overlay Zone. Species covered by the MSCP that were observed in the project area are presented in Section 5.14.10f the NES.

All sensitive plant and animal species that might occur in the project area, including all MSCP covered species and City of San Diego narrow endemic species, are presented in Appendix C of the NES. Project consistency with the MSCP Subarea Plan; including the MHPA land use adjacency guidelines (Section 1.4.3) is evaluated in this recirculated EIR in Section 3.1.

Agency Coordination. Informal consultation with the USFWS and CDFW was initiated previously by the City due to the presence of light-footed clapper rail, a federally and state endangered species and a state Fully Protected Species. CDFW and USFWS were involved in multi-agency coordination meetings held in 2005. In 2006, CDFW and USFWS issued a joint comment letter on the 2006 Draft EIR for the project. That letter included specific concerns regarding potential project impacts to light-footed clapper rail and other biological resources. In a meeting held in 2012 with the City of San Diego and consultants, CDFW, USFWS, USACE and RWQCB, the issues brought forth in the 2006 letter were reiterated. The 2006 letter has been included in the Recirculated Draft EIR in the letters of comment (see Appendix E). It was requested that these issues be specifically addressed in the project NES and EIR. Accordingly, these issues are addressed. Further consultation with the wildlife agencies under FESA may be required in order to appropriately address potential project impacts to listed species (including indirect impacts to the light-footed clapper rail) and minimization/mitigation measures.

The USFWS publishes on-line lists of species of concern that may occur within areas of proposed projects. The list for projects in the vicinity of the El Camino Real Bridge Replacement Project is included in Appendix C (Regional Species and Habitats of Concern) of the NES. There are 19 species of USFWS concern that may occur in the area. The potential for these species, and other species and habitats of regional concern, to occur in the project area are addressed in Appendix C of the NES.

Permit application would be required for impacts to jurisdictional areas. Coordination with agencies such as USACE, CDFW, CCC, and RWQCB would be required. At this time, no permit applications have been submitted.

The Jurisdictional Delineation report will be submitted to USACE to obtain concurrence on the delineation that was prepared for the proposed project.

3.12.2 Affected Environment

3.12.2.1 General Physiography and Soils

Regionally, the project site is situated in the San Dieguito River floodplain. The project alignment extends across the floodplain of the San Dieguito River and is generally flat with the exception of the river bed. The San Dieguito River channel east of the bridge is fortified with quarter-ton rip rap while the channel west of the bridge consists of a sandy substrate. Elevation in the BSA is approximately 20 feet above mean sea level (msl) but drops between 5 and 10 feet from the existing roadbed to the adjacent habitat. Elevation at the San Dieguito River bottom is approximately 5 feet above msl.

The following four soil series are reported as occurring within the BSA: Tujunga series, Grangeville series, Huerhuero series, and Corralitos series (NRCS 2011, USDA 1973). The soil series and specific soil types are described below.

The Tujunga series consists of very deep excessively drained sands derived from granitic alluvium. These soils are found on alluvial fans and flood plains and have slopes of 0 to 5

percent. Tujunga sand, 0 to 5 percent slopes, occurs along the alluvial valley bottom within the BSA.

The Grangeville series consists of somewhat poorly drained, very deep fine sandy loams derived from granitic alluvium. These soils are on alluvial fans and alluvial plains, and have slopes of 0 to 2 percent. Grangeville fine sandy loam, 0 to 2 percent slopes, occurs in the northern and southern portions of the BSA.

The Huerhuero series consists of moderately well-drained loams that have a clay subsoil. These soils developed in sandy marine sediments and have slopes of 2 to 30 percent. Huerhuero loam, 15 to 30 percent slopes, is reported from the southernmost portion of the BSA.

The Corralitos series consists of somewhat excessively drained, very deep loamy sands that formed in alluvium derived from marine sandstone. These soils are typically found in narrow valleys and on small alluvial fans, and have slopes of 0 to 15 percent. Corralitos loamy sand, 0 to 5 percent slopes and Corralitos loamy sand, 5 to 9 percent slopes, occur along the northern portion of the BSA.

3.12.2.2 Vegetation Communities

A total of 18 vegetation communities and land cover types are present within the BSA. Wetland habitats include: disturbed southern willow scrub, mulefat scrub, disturbed mulefat scrub, coastal freshwater marsh, disturbed coastal freshwater marsh, disturbed coastal brackish marsh, alkali marsh, disturbed southern coastal salt marsh, disturbed wetland. Upland habitats include; disturbed Diegan coastal sage scrub – coastal form, Disturbed coastal sage scrub – Baccharis dominated, tamarisk scrub non-native grassland, disturbed land areas, eucalyptus woodland, ornamental, bare ground, and developed areas. All vegetation communities and land cover types (per Oberbauer 2008) are described below and summarized in Table 3.12-3. Vegetation communities within the footprints of the alternatives and the JPA Mitigation Site are depicted on Figures 3.12-2a through 3.12-2f.

Vegetation Community (Oberbauer et al. 2008 Code)	Acreage
Disturbed southern willow scrub (63320)	1.85
Mulefat scrub (63310)	0.30
Disturbed mulefat scrub (63310)	0.25
Coastal freshwater marsh (52410)	1.59
Disturbed coastal freshwater marsh (52410)	0.39
Disturbed coastal brackish marsh (52200)	0.08
Disturbed southern coastal salt marsh (52120)	4.11
Alkali marsh (52300)	0.48
Disturbed wetland (11200)	0.83
Disturbed Diegan coastal sage scrub – coastal form(32510)	0.97
Disturbed Diegan coastal sage scrub – Baccharis dominated (32520)	14.77
Tamarisk scrub (63810)	1.69
Non-native grassland	0.04
Disturbed Land (aka Disturbed Habitat -11300)	9.24
Eucalyptus woodland (11100)	0.42
Ornamental (11000)	1.31

Table 3.12-3						
Vegetation Communities and Land Cover Types						

(conunued)	
Vegetation Community (Oberbauer et al. 2008 Code)	Acreage
Bare ground	0.23
Urban/Developed (12000)	17.12
Total	55.78

Table 3.12-3 Vegetation Communities and Land Cover Types (continued)

Source: ICF/Nordby 2015

Disturbed Southern Willow Scrub (63320). Southern willow scrub is described as dense, broad-leafed, winter-deciduous riparian thicket dominated by several willow (*Salix*) species with scattered western cottonwood (*Populus fremontii*) and western sycamore (*Platanus racemosa*). Most stands are too dense to allow an understory to develop. This vegetation community is typically found on loose, sandy, or fine gravelly alluvium deposited near stream channels (Oberbauer et al. 2008). The abundance of nonnative species is the characteristic that distinguishes disturbed southern willow scrub from undisturbed southern willow scrub. In the BSA, plants detected in disturbed southern willow scrub included arroyo willow (*Salix laevigata*), narrow-leaf willow (*Salix exigua*), mulefat, tamarisk (*Tamarix ramosissima*), San Diego marsh-elder (*Iva hayesiana*), saltgrass (*Distichlis spicata*) and black mustard (*Brassica nigra*). A few individuals of pacific pickleweed (*Salicornia pacifica*) and fleshy jaumea (*Jaumea carnosa*) occur within disturbed southern willow scrub as remnants of areas that previously supported coastal brackish marsh. A total of 1.85 acres of disturbed southern willow scrub occur in the BSA.

Mulefat Scrub (63310). Mulefat scrub is described as a depauperate, tall, herbaceous riparian scrub strongly dominated by mulefat. This early seral community is maintained by frequent flooding. It is usually found in intermittent stream channels with fairly coarse substrate and moderate depth to the water table (Oberbauer et al. 2008). Mulefat scrub in the BSA is predominated by mulefat. A total of 0.30 acre of mulefat scrub occurs in the BSA.

The abundance of nonnative shrub species not typically associated with mulefat scrub is the characteristic that distinguishes disturbed mulefat scrub from undisturbed mulefat scrub. Plant species detected in disturbed mulefat scrub occurring along the San Dieguito River included mulefat, tamarisk, arroyo willow, yerba mansa (*Anemopsis californica*), southwestern spiny rush (*Juncus acutus* ssp. *leopoldii*), chaparral broom (*Baccharis pilularis*), broom baccharis (*Baccharis sarothroides*), and tree tobacco (*Nicotiana glauca*). Patches of disturbed mulefat, tree tobacco, broom baccharis, and chaparral broom. A total of 0.25 acre of disturbed mulefat scrub occurs in the BSA.

Coastal Freshwater Marsh (Holland Code 52410). Coastal freshwater marsh is dominated by perennials and emergent monocots up to 13 to 16 feet tall, often forming completely closed canopies. Freshwater marsh habitats are found in areas permanently flooded by fresh water, and lacking significant current from water flow. Prolonged saturation in these types of habitats allows for the accumulation of deep, peaty soils (Oberbauer et al. 2008). Coastal freshwater marsh in the BSA is predominated by southern cattail (*Typha domingensis*), willow dock (*Rumex salicifolius*), saltgrass, curly dock (*Rumex crispus*), common sow-thistle (*Sonchus oleraceus*), salt heliotrope (*Heliotropium curassavicum*), and southwestern spiny rush. Portions of the San Dieguito River currently supporting coastal freshwater marsh previously supported coastal brackish marsh, as reported in the 2006 NES (Tierra 2006). A few individuals of Pacific

pickleweed occur along the periphery of coastal freshwater marsh as remnants of coastal brackish marsh previously occurring in this area. A total of 1.59 acre of coastal freshwater marsh occurs in the BSA.

The abundance of nonnative plant species and a high level of disturbance are the main characteristics that distinguish disturbed coastal freshwater marsh from undisturbed coastal freshwater marsh. Disturbed coastal freshwater marsh occurs in a small area in the San Dieguito River and also along two drainages parallel to Via de la Valle. In the BSA disturbed coastal freshwater marsh is predominated by southern cattail, curly dock, common celery (*Apium graveolens*), telegraph weed (*Heterotheca grandiflora*), Bermuda grass (*Cynodon dactylon*), California bulrush (*Schoenoplectus californicus*), Boccone's sand-spury (*Spergularia bocconi*), and pampas grass (*Cortaderia selloana*). A total of 0.39 acre of disturbed coastal freshwater marsh occurs within the BSA.

Disturbed Coastal Brackish Marsh (52200). Coastal brackish marsh is typically dominated by perennial, herbaceous monocots that grow to 6 feet tall. This vegetation community supports plant species typical of both salt marsh and freshwater marsh (Oberbauer et al. 2008). The abundance of nonnative species and the evidence of human disturbance are the characteristics that distinguish disturbed coastal brackish marsh from undisturbed coastal brackish marsh. In the BSA, disturbed coastal brackish marsh is predominated by annual beard grass (*Polypogon monspeliensis*), Bermuda grass, fleshy jaumea, pacific pickleweed, yerba mansa, arrow weed (*Pluchea sericea*), saltgrass, and common celery. This vegetation community occurs as a small patch that is a remnant of the more expansive area of coastal brackish marsh that previously occurred in this area (Tierra 2006). A total of 0.08 acre of disturbed coastal brackish marsh occurs within the BSA.

Disturbed Southern Coastal Salt Marsh (52120). Southern coastal salt marsh typically occurs along sheltered inland margins of bays, lagoons, and estuaries that are subject to regular tidal inundation by salt water for at least part of the year. This vegetation community is comprised of herbaceous and suffructescent, salt-tolerant hydrophytes (Oberbauer et al. 2008). Plant species detected in the BSA included alkali weed (*Cressa truxillensis*), salt grass, pacific pickleweed, five-hook bassia (*Bassia hyssopifolia*), salt heliotrope, alkali-heath (*Frankenia salina*), and bush seepweed (*Suaeda nigra*). Two areas of disturbed costal salt marsh occur in the BSA. One area is situated south of Villa de la Valle and north of the polo field. This area is flat and is used as a parking area for certain events at the polo field. This area becomes inundated during rain events. The second area occurs in the JPA Mitigation Site. A total of 4.11 acres of disturbed southern coastal salt marsh occur within the BSA.

Disturbed Wetland (11200). Disturbed wetland describes an area supporting a composition of obligate hydrophytes that are predominantly non-native (Oberbauer et al. 2008). Disturbed wetlands are typically in areas that historically supported wetland habitat and are currently subject to a high level of disturbance. Plant species detected on site included curly dock, annual beard grass, Bermuda grass, and salt grass. This vegetation community is situated within a portion of the JPA Mitigation Site that was not previously involved in active agriculture. This vegetation type also occurs along a drainage west of the San Diego Polo Club, parallel to El Camino Real. The drainage situated west of the polo field is mowed regularly by the property owner. Therefore, the presence and abundance of wetland vegetation varies and is not always easily detectable. A total of 0.83 acre of disturbed wetland occurs within the BSA.

Alkali Marsh (52300). Alkali marsh is similar to coastal brackish marsh with many of the same species (Oberbauer et al. 2008). This habitat persists where saturated soils are present for all or a

portion of the year. Plant species detected on-site were heavily dominated by alkali weed (*Cressa truxillensis*) with occasional bush seepweed (*Suaeda nigra*). This vegetation community is situated within a portion of the JPA Mitigation Site that was not previously involved in active agriculture. A total of 0.48 acre of alkali marsh occurs within the BSA, all of which is located on the JPA Mitigation Site.

Disturbed Diegan Coastal Sage Scrub – Coastal Form (32520). Diegan coastal sage scrub – coastal form, a City of San Diego Tier II habitat type, is found in coastal areas from Los Angeles County south into Baja California. Oberbauer et al. (2008) describes this vegetation community as being comprised of low-growing, aromatic, drought-deciduous, soft-woody shrubs that have an average height of 3 to 4 feet. Typically, this community is found on sites with steep, dry slopes or on clay-rich soils that are slow to release stored water. The sparse distribution of the shrub species typically dominant in this vegetation community, as well as the abundance of nonnative species, are the characteristics that distinguish disturbed Diegan coastal sage scrub from undisturbed Diegan coastal sage scrub. In the BSA, this vegetation community occurs along El Camino Real and in a strip between El Camino Real and the golf course. Dominant species include California encelia (Encelia californica), coastal sagebrush (Artemisia californica), Santa Catalina Island buckwheat (Eriogonum giganteum var. giganteum), goldenbush (Isocoma menziesii), crown daisy (Glebionis coronaria), black mustard, and jimson weed (Datura wrightii). Areas of disturbed Diegan coastal sage scrub occurring east of El Camino Real and south of San Dieguito Road support San Diego sunflower (Bahiopsis laciniata). A total of 0.97 acre of disturbed Diegan coastal sage scrub occur within the BSA.

Disturbed Diegan Coastal Sage Scrub – **Baccharis Dominated (32530).** Diegan coastal sage scrub – Baccharis dominated is similar to Diegan coastal sage scrub – coastal form but dominated by Baccharis species (Oberbauer et al. 2008). It typically occurs on disturbed or nutrient poor soils. It is often found with other forms of Diegan coastal sage scrub and on the terraces of river valleys. Characteristic species include *Baccharis sarothroides* and *B. pilularis*. The high percentage of cover contributed by non-native species distinguishes the disturbed form of this community from the undisturbed form. Non-native species occurring in this vegetation community in high densities include tree tobacco (*Nicotiana glauca*) and five-hook bassia (*Bassia hyssopifolia*). In the BSA, this vegetation community is the dominant community that has developed in the abandoned agricultural fields that comprise the JPA Mitigation Site. A total of 14.3 acres of Diegan coastal sage scrub – Baccharis dominated occur in the BSA.

Non-native Grassland (42200). Non-native grassland, a City of San Diego Tier III B common upland habitat, is typified by the presence of dense to sparse cover by annual grasses with one-foot-high flowering culms (Oberbauer et al. 2008). In San Diego County, the presence of *Avena, Bromus, Erodium* and *Brassica* are common indicators. In the BSA, this vegetation community exists as a small (0.04 acre), isolated patch of habitat at the northwest boundary of the JPA Mitigation Site. The dominant species observed was ripgut brome (*Bromus diandrus*). Non-native grassland can be an important habitat to small mammals and raptors that feed on them.

Tamarisk Scrub (63810). Tamarisk scrub describes an area predominated by tamarisk, an invasive nonnative tree species. This vegetation community typically occurs on sandy or gravelly braided washes or intermittent streams, often in areas where high evaporation increases the area's salinity. Within the BSA, tamarisk scrub occurs along the San Dieguito River and is predominated by tamarisk, although it also supports scattered willow species and mulefat. A total of 0.1.69 acre of tamarisk scrub occurs within the BSA.

Disturbed Land (11300). Disturbed land is a City of San Diego Tier IV habitat type that equates to Oberbauer (2008) Disturbed Habitat category. Disturbed lands are areas currently or previously subject to high levels of disturbance and consist of bare earth or dominated by nonnative forb plant species. Within the BSA, disturbed areas occur south of the San Dieguito River within the JPA Mitigation Site and as a narrow strip south of Via de la Valle. Native and nonnative plants occurring in disturbed land areas within the JPA Mitigation Site included five-hook bassia, tree tobacco, tomato (*Lycopersicon* sp.), New Zealand spinach (*Tetragonia tetragonioides*), common knotweed (*Polygonum aviculare depressum*), salt heliotrope, mulefat, chaparral broom, and cheeseweed (*Malva parviflora*). Disturbed land occurring along Via de la Valle and along El Camino Real is predominated by five-hook bassia, pampas grass, tree tobacco, and crown daisy. A total of 9.24 acres of disturbed land occurs within the BSA.

Eucalyptus Woodland (11100). Eucalyptus woodland, a City of San Diego Tier IV habitat type, typically consists of monotypic stands of eucalyptus (*Eucalyptus* sp.) trees with little vegetation in the understory. Within the BSA, eucalyptus woodland is predominated by eucalyptus trees with scattered ripgut grass in the understory. A total of 0.42 acre of eucalyptus woodland occurs within the BSA.

Ornamental (11000). Ornamental, a City of San Diego Tier IV habitat type, describes areas that have been landscaped by the City and/or property owners and support nonnative, cultivated vegetation. Plant species occurring in ornamental vegetation included Hottentot fig (*Carpobrotus edulis*), evergreen pear (*Pyrus kawakanii*), American century plant (*Agave americana*), Canary Island date palm (*Phoenix canariensis*), queen palm (*Syagrus romanzoffiana*), and lawns. A total of 1.31 acres of ornamental vegetation occur within the BSA.

Bare Ground. Bare ground describes an area where soils are so compacted that vegetation will not grow. A total of 0.23 acre of bare ground occurs within the BSA.

Urban/Developed (12000). Urban/developed areas on the project site consist of Via de la Valle and El Camino Real, and their rights-of-way, the golf course, and the polo field. Paved areas, such as existing roads and their rights-of-way, do not provide habitat for wildlife or plant species. Although the golf course and the polo field are not paved, vegetation occurring in these areas consists of lawns and ornamental areas that are maintained regularly and, thus, do not provide suitable habitat for wildlife or native plant species. A total of 17.19 acres of developed areas occur within the BSA.

3.12.2.3 Plant Species

A total of 99 plant species were detected within the BSA. A complete list of plant species detected is provided in Appendix A of the NES.

3.12.2.4 Wildlife Species

A total of 55 wildlife species were detected within the BSA. A complete list of the wildlife species detected is provided in Appendix B of the NES. Wildlife species observed regularly within the BSA are listed below.

Bird species most commonly detected within the BSA included mallard (*Anas platyrhynchos*), American kestrel (*Falco sparverius*), mourning dove (*Zenaida macroura*), Anna's hummingbird (*Calypte anna*), western scrub-jay (*Aphelocoma californica*), northern rough-winged swallow (*Steigidopteryx serripennis*), cliff swallow (*Petrochelidon pyrrhonota*), bushtit (*Psaltriparus*) minimus), common yellowthroat (Geothlypis trichas), California towhee (Melozone crissalis), song sparrow (Melospiza melodia), great-tailed grackle (Quiscalus mexicanus), brown-headed cowbird (Molothrus ater), house finch (Carpodacus mexicanus), and lesser goldfinch (Carduelis psaltria).

Mammals detected included desert cottontail (*Sylvilagus audubonii*), California ground squirrel (*Spermophilus beecheyi*), and Botta's pocket gopher (*Thomomys bottae*). Indicators, such as tracks and scat, were used to determine the occurrence of coyote (*Canis latrans*) and bobcat (*Lynx rufus*) within the BSA. Western fence lizard (*Sceloporus occidentalis*) and southern Pacific rattlesnake (*Crotalus helleri*) were the only reptiles detected within the BSA.

3.12.2.5 Wildlife Movement Corridors

Wildlife movement corridors are defined as areas that connect suitable wildlife habitat areas in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. Natural features such as canyon drainages, ridgelines, or areas with vegetation cover provide corridors for wildlife travel. Wildlife movement corridors are important because they provide access to mates, food, and water; allow the dispersal of individuals away from high population density areas; and facilitate the exchange of genetic traits between populations (Beier and Loe 1992). Wildlife movement corridors are considered sensitive by resource and conservation agencies.

Along the San Dieguito River channel, riparian scrub and freshwater marsh habitats support a diverse wildlife population. A contiguous band of habitat occurring along the river functions as part of a regional, east/west-trending wildlife corridor. Federally and state endangered species, including light-footed clapper rail and least Bell's vireo, are known to utilize the wetland habitats in the BSA.

The portion of the San Dieguito River occurring within the BSA is bounded by a fallow agricultural field (the JPA Mitigation Site) to the southwest, horse stables to the northwest, a polo field to the northeast, and a golf course to the southeast. However, the San Dieguito River offers sufficient vegetative cover for wildlife species to move through this area.

3.12.2.6 Invasive Species

During the general fieldwork and focused studies, plant species lists were compiled. A complete list of plants species observed during the current fieldwork is provided in Appendix A of the NES. Included in the floral list are species classified as invasive to natural communities. Following the California Invasive Plant Council classification, 29 of the 99 species of plants observed within the project study area are classified as invasive plant species. The invasive species detected in the BSA are listed in Chapter 3 of the NES.

3.12.2.7 Regional Species and Habitats of Concern

Plant and wildlife species are considered to have special status if they have been listed as such by federal or state agencies or by special interest groups, such as the California Native Plant Society (CNPS; 2011). The CDFW publishes separate comprehensive lists for plants and animals through the CNDDB (CDFW 2011a, 2011b). These include taxa officially listed by the state and federal governments as Endangered, Threatened, or Rare, and candidates for state or federal listing. The City also considers a list of narrow endemic plant species as sensitive biological

resources. In addition, habitats that support a listed species, wetlands, and wetland buffers are also considered to be sensitive biological resources.

There are 86 special-status plant species, 14 special-status wildlife species, and 12 sensitive natural vegetation communities known to occur within the region. A list of these species and vegetation communities, as well as their requirements and likelihood of occurrence within the BSA, is provided in Appendix C of the NES.

Sensitive Plants and Vegetation. Special status plant species discussed in detail in Chapter 4 of the NES are Palmer's sagewort (*Artemisia palmeri*), San Diego sunflower (*Bahiopsis laciniata*), San Diego marsh-elder (*Iva hayesiana*), and Southwestern spiny rush (*Juncus acutus* ssp. *leopoldii*).

Eleven depleted native vegetation communities are present within the BSA: disturbed southern willow scrub, mulefat scrub, disturbed mulefat scrub, coastal freshwater marsh, disturbed coastal freshwater marsh, disturbed brackish marsh, disturbed southern coastal salt marsh, disturbed wetland, alkali marsh, disturbed Diegan coastal sage scrub –coastal form and disturbed Diegan coastal sage scrub – Baccharis dominated. The term "depleted" is used to identify habitats that are considered sensitive that have historically been impacted and are currently more restricted in their distribution.

Wetland habitats occurring within and in association with the San Dieguito River channel are considered to be of high ecological value. These habitats are contiguous with other areas of high quality habitat, support several special-status species, including light-footed clapper rail and least Bell's vireo, and are part of an important wildlife corridor. These habitats provide high quality nesting and foraging habitat for several wildlife species.

Wetland habitats occurring outside of the river channel are of low ecological value. These habitats are not contiguous with larger areas of higher quality habitat. Wetland habitats occurring parallel to El Camino Real and Via de la Valle are narrow, small in size, adjacent to high traffic roads, and provide marginal foraging and nesting habitat for wildlife species. The area north of the polo field and south of Via de la Valle is highly disturbed because this area is used as a parking lot for events at the polo field. Areas within the JPA Mitigation Site are also of low quality because they are open, occur as patches, and are not contiguous to higher quality habitat.

Sensitive Wildlife. Special status wildlife species discussed in detail in Chapter 4 of the NES are Northern harrier (*Circus cyaneus*), Clark's marsh wren (*Cistothorus palustris clarkae*), Yellow warbler (*Dendroica petechia*), White-tailed kite (*Elanus leucurus*), Yellow-breasted chat (*Icteria virens*), Light-footed clapper rail, and Least Bell's vireo. Nesting birds and raptors may occur throughout the BSA.

A bat habitat assessment and a nocturnal bat survey were conducted on August 25, and a diurnal bat survey was conducted on September 2, 2011, all within the bat biological survey area. No bat activity or sign indicating that this bridge is used as a roosting site was detected during the surveys. However, three big brown bats (*Eptesicus fuscus*) were detected flying over the bridge and foraging in the surrounding areas during the nocturnal bat survey conducted on September 2, 2011.

A habitat assessment for Belding's savannah's sparrow and a habitat assessment for southwestern willow flycatcher were conducted on August 11, 2011, within the general BSA. Both habitat

assessments determined that the BSA does not support potentially suitable habitat for either of these species. Consequently, focused surveys were not deemed necessary.

Light-footed clapper rails are of particular sensitivity. All areas supporting coastal freshwater marsh in the BSA are considered occupied by the light-footed clapper rail. In addition, all areas of disturbed southern willow scrub and disturbed and undisturbed mulefat scrub are considered as foraging/refugia habitats utilized by the clapper rail. In coordination with the City, USFWS, and CDFW, it was determined that updated light-footed clapper rail surveys would not be required because this area is surveyed annually and the presence of this species within the BSA had already been determined. Light-footed clapper rail was also detected aurally east of the bridge in the BSA on April 17 and May 9, 2009, during focused surveys for the least Bell's vireo conducted by ICF (Appendix G of the NES).

In 2006, 31 to 36 light-footed clapper rail pairs, including 4 to 5 pairs east of the bridge, were detected during focused surveys conducted within the San Dieguito River (Tierra 2006). According to a habitat assessment for the light-footed clapper rail conducted in 2004 (Appendix J of the 2006 NES, Varanus 2004) a minimum of 5, and possibly as many as 8 pairs, of clapper rail and up to 10 or more territories were detected in the vicinity of the BSA during the 2004 habitat assessment. The area surveyed at that time included portions of the San Dieguito River approximately 1,000 feet east and west of the El Camino Real Bridge (Tierra 2006). Annual surveys of the light-footed clapper rail are conducted by CDFW for the San Dieguito River, including upstream and downstream of the El Camino Real Bridge; the most recent published results are from the 2014 survey season.

MSCP Covered Species. The project lies within the boundaries of the City MSCP Subarea and a portion of the project lies within the MHPA. All sensitive plant and animal species that might occur in the project area, including all MSCP covered species and City of San Diego narrow endemic species, are presented in Appendix C of the NES. Species covered by the MSCP that were observed in the project area are light-footed clapper rail, least Bell's vireo, and northern harrier. Project compliance with the MSCP will require conformance to the conditions of coverage described in Section 5.14.1 of the NES. Conformance of the project to the MSCP requirements and MHPA guidelines is evaluated in Section 3.1.3. of this recirculated EIR. A summary of MSCP and MHPA conformance and a discussion of conditions of coverage for light-footed clapper rail, least Bell's vireo, and northern harrier are provided in Section 3.12.3.5.

3.12.3 Impacts

Issues to be addressed are the following:

Issue 1: Would the proposed project result in impacts to important habitat or to sensitive upland and/or animal species?

Issue 2: Would the proposed project interfere with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors?

Issue 3: Would the project affect the long-term conservation of biological resources?

To coherently cover the broad concerns in Issue 1, the discussion of impacts to important habitat or to sensitive upland and/or animal species is subdivided into the following sub-issues: a) vegetation communities, b) sensitive plants, c) occupied habitat of sensitive wildlife, d) direct impacts to sensitive wildlife, e) impacts to sensitive wildlife from construction noise, f) impacts of river hydraulics on the light-footed clapper rail, and g) invasive species.

3.12.3.1 Issue 1a: Impacts to Vegetation Communities

The project would result in impacts to depleted native vegetation communities, jurisdictional habitats, and special-status species, as depicted in Figures 3.12-2a through 3.12-2f. Table 3.12-4 presents a summary comparison of the impacts to vegetation communities associated with each of the alternatives and the JPA Mitigation Site.

A formal delineation of the BSA identified the presence of resources under the jurisdiction of USACE, RWQCB, CDFW, and the City, including wetland waters of the U.S., non-wetland waters of the U.S., state streambed, and adjacent wetlands/riparian habitat. Table 3.12-4 includes quantification of impacts to jurisdictional wetland areas, which are identified differently by the USACE/RWQCB and CDFW.

Impacts from Bridge/Road Widening. The project would have varying impacts from bridge and road widening depending on the alternative, as discussed below.

Western Alignment Alternative. Road and bridge improvement activities associated with the Western Alignment Alternative would result in a total of 4.0732 acres of impacts to wetland habitats (Figure 3.12-2a). Impacts include 0.30 acre of disturbed southern willow scrub, 0.06 acre of disturbed mulefat scrub, 0.48 acre of coastal freshwater marsh, 0.0023 acre of coastal freshwater marsh situated within Fairbanks Mitigation Site, 0.34 acre of disturbed coastal freshwater marsh, 2.43 acres of disturbed southern coastal salt marsh, 0.27 acre of disturbed wetland, and 0.19 acre of tamarisk scrub.

In terms of jurisdictional areas, the Western Alignment Alternative would result in permanent impacts to 2.76 acres and temporary impacts to 0.06 acre of USACE/RWQCB jurisdictional areas. This includes permanent impacts to 0.83 acre and temporary impacts to 0.55 acre of wetland waters of the U.S., and permanent impacts to 1.93 acres and temporary impacts to 0.5 acre of adjacent wetlands. As classified by CDFW, this alternative would result in permanent impacts to 2.92 acres and temporary impacts to 1.14 acres of CDFW jurisdictional areas. This includes 0.83 acre of permanent impacts and 0.64 acre of temporary impacts to CDFW state streambed, and 2.09 acres of permanent impacts and 0.5 acre of temporary impacts to CDFW riparian habitat.

Road and bridge improvement activities would impact a total of 0.91 acre of sensitive upland habitats, including 0.45 acre of disturbed Diegan coastal sage scrub – coastal form and 0.46 acre of disturbed Diegan coastal sage scrub – Baccharis dominated.

<u>Central Alignment Alternative</u>. Road and bridge improvement activities associated with the Central Alignment Alternative would result in a total of 4.603 acres of impacts to wetland habitats (Figure 3.12-2b). Impacts include 0.06 acre of disturbed southern willow scrub, 0.0379 acre of mulefat scrub, 0.012 acre of mulefat scrub within the Fairbanks Mitigation Site, 0.10 acre of disturbed mulefat scrub, 0.686 acre of coastal freshwater marsh, 0.004 acre of coastal freshwater marsh, 2.75 acres of disturbed southern coastal salt marsh and 0.60 acre of disturbed wetland.

In terms of jurisdictional areas, the Central Alignment Alternative would result in permanent impacts to 3.69 acres and temporary impacts to 0.94 acre of USACE/RWQCB jurisdictional

areas. This includes permanent impacts to 1.50 acres and temporary impacts to 0.38 acre of wetland waters of the U.S., and permanent impacts to 2.19 acres and temporary impacts to 0.56 acre of adjacent wetlands. As classified by CDFW, this alternative would result in permanent impacts to 3.67 acres and temporary impacts to 0.93 acre of CDFW jurisdictional areas. This includes 1.50 acres of permanent impacts and 0.37 acre of temporary impacts to CDFW state streambed, and 2.17 acres of permanent impacts and 0.56 acre of temporary impacts to CDFW riparian habitat.

Road and bridge improvement activities would result in impacts to a total of 0.763 acre of sensitive upland habitats, including 0.515 acre of disturbed Diegan coastal sage scrub – coastal form, 0.038 acre of disturbed Diegan coastal sage scrub – coastal form within the Fairbanks Mitigation Site and 0.21 acre of disturbed Diegan coastal sage scrub – Baccharis dominated.

	Western Alignment Alternative	Central Alignment Alternative	Eastern Alignment Alternative	Roundabout Alignment Alternative	Road Capacity/ Bicycle Safety Alternatives*	JPA Mitigation
Sensitive Resource	Impacts (Acres)	Impacts (Acres)	Impacts (Acres)	Impacts (Acres)	Impacts (Acres)	Site
WETLAND IMPACTS						
Disturbed southern willow scrub	0.30	0.06	0.12	0.31	0.0884	0.07
Mulefat scrub	0.0	0.0379	0.22	0.22	0.0	0.0
Mulefat scrub ¹	0.0	0.012	0.068	0.068	0.0	0.0
Disturbed mulefat scrub	0.06	0.10	0.25	0.25	0.0219	0.0
Tamarisk scrub	0.19	0.0	0.003	0.003	0.0338	1.33
Coastal freshwater marsh	0.48	0.69	1.19	1.27	0.4539	0.0
Coastal freshwater marsh ¹	0.0023	0.004	0.004	0.0041	0.0027	0.0
Disturbed coastal freshwater marsh	0.34	0.35	0.38	0.38	0.3308	0.0
Disturbed southern coastal salt marsh	2.43	2.75	2.27	3.79	1.0460	0.0
Alkali marsh	0.0	0.0	0.0	0.03	0.0	0.48
Disturbed wetland	0.27	0.60	0.07	0.11	0.0018	0.23
Total Wetland Impacts	4.072	4.60	4.579	6.435	1.98	2.11
UPLAND IMPACTS						
Disturbed Diegan coastal sage scrub – coastal form	0.45	0.515	0.40	0.69	0.4065	0.03
Disturbed Diegan coastal sage scrub – coastal form ¹	0.0	0.038	0.037	0.037	0.0	0.0
Disturbed Diegan coastal sage scrub – Baccharis dominated	0.46	0.21	0.0002	0.06	0.0384	14.3
Non-native grassland	0.0	0.0	0.0	0.0	0.0	0.004
JURISDICTIONAL IMPACTS ²						
USACE/RWQCB	Permanent: 2.76	Permanent: 3.69	Permanent: 2.64	Permanent: 4.23	Permanent: 1.28	Permanent: 0.0
Jurisdictional areas	Temporary: 0.6	Temporary: 0.94	Temporary: 1.65	Temporary: 1.84	Temporary: 0.72	Temporary: 0.0
CDFW Jurisdictional areas	Permanent: 2.92 Temporary: 1.14	Permanent: 3.67 Temporary: 0.93	Permanent: 2.84 Temporary: 1.73	Permanent: 4.63 Temporary: 1.81	Permanent: 1.33 Temporary: 0.80	Permanent: 0.11 Temporary: 2.0

 Table 3.12-4

 Summary of Impacts to Vegetation Communities from All Alternatives

Source: ICF/Nordby 2015 (*Note: Data for Road Capacity and Bicycle Safety Alternatives compiled by RECON separately from ICF/Nordby 2015) ¹ Fairbanks Mitigation Site ² Acreages for USACE/RWQCB and CDFW impacts are not additive and occur within Total Wetland Impacts. Eastern Alignment Alternative. Road and bridge improvement activities associated with the Eastern Alignment Alternative would result in a total of 4.5791 acres of impacts to wetland habitats (Figure 3.12-2c). Impacts include 0.12 acre of disturbed southern willow scrub, 0.222 acre of mulefat scrub, 0.068 acre of mulefat scrub within the Fairbanks Mitigation Site, 0.25 acre of disturbed mulefat scrub, 1.1881 acres of coastal freshwater marsh, 0.004 acre of coastal freshwater marsh within the Fairbanks Mitigation Site, 0.384 acre of disturbed coastal freshwater marsh, 2.27 acres of disturbed southern coastal salt marsh, 0.003 acre of tamarisk scrub and 0.07 acre of disturbed wetland.

In terms of jurisdictional areas, the Eastern Alignment Alternative would result in permanent impacts to 2.64 acres and temporary impacts to 1.65 acres of USACE/RWQCB jurisdictional areas. This includes permanent impacts to 0.99 acre and temporary impacts to 1.09 acres of wetland waters of the U.S., permanent impacts to 1.64 acre and temporary impacts to 0.55 acre of adjacent wetlands, and permanent impacts to 0.01 acre and temporary impacts to 0.01 acre of non-wetland waters of the U.S. As classified by CDFW, this alternative would result in permanent impacts to 2.84 acres and temporary impacts to 1.74 acres of CDFW jurisdictional areas. This includes 0.99 acre of permanent impacts and 1.10 acres of temporary impacts to CDFW state streambed, and 1.85 acres of permanent impacts and 0.63 acre of temporary impacts to CDFW riparian habitat.

Road and bridge improvement activities would impact a total of 0.4402 acre of sensitive upland habitats, including 0.403 acre of disturbed Diegan coastal sage scrub – coastal form, 0.037 acre of disturbed Diegan coastal sage scrub – coastal form within the Fairbanks Mitigation Site and 0.0002 acre of disturbed Diegan coastal sage scrub – Baccharis dominated.

<u>Roundabout Alternative</u>. Road and bridge improvement activities associated with the Roundabout Alternative would result in impacts to a total of 6.4353 acre of wetland habitats (Figure 3.12-2d). Impacts include 0.31 acre of disturbed southern willow scrub, 0.22 acre of mulefat scrub, 0.068 acre of mulefat scrub within the Fairbanks Mitigation Site, 0.25 acre of disturbed mulefat scrub, 1.27 ac of coastal freshwater marsh, 0.0041 acre of coastal freshwater marsh within the Fairbanks Mitigation Site, 0.38 acre of disturbed coastal freshwater marsh, 3.79 acre of disturbed southern coastal salt marsh, 0.11 acre of disturbed wetland, 0.003 acre of tamarisk scrub, and 0.0302 acre of alkali marsh.

In terms of jurisdictional areas, the Roundabout Alternative would result in permanent impacts to 4.23 acres and temporary impacts to 1.84 acres of USACE/RWQCB jurisdictional areas. This includes permanent impacts to 1.11 acres and temporary impacts to 1.15 acres of wetland waters of the U.S., permanent impacts to 3.11 acres and temporary impacts to 0.68 acre of adjacent wetlands, and permanent impacts to 0.01 acre and temporary impacts to 0.01 acre of non-wetland waters of the U.S. As classified by CDFW, this alternative would result in permanent impacts to 4.63 acres and temporary impacts to 1.81 acres of CDFW jurisdictional areas. This includes 1.11 acres of permanent impacts and 1.13 acres of temporary impacts to CDFW state streambed, and 3.52 acres of permanent impacts and 0.68 acre of temporary impacts to CDFW riparian habitat.

Road and bridge improvement activities would impact a total of 0.787 acre of sensitive upland habitats including 0.69 acre of disturbed Diegan coastal sage scrub – coastal form, 0.037 acre of disturbed Diegan coastal sage scrub - coastal form within the Fairbanks Mitigation Site and 0.06 acre of disturbed Diegan coastal sage scrub – Baccharis dominated.

<u>Road Capacity/Bicycle Safety Alternatives</u>. Road and bridge improvement activities associated with the narrow roadway cross section alternatives (Road Capacity Alternative and Bicycle Safety Alternative) would result in a total of 1.98 acres of impacts to wetland habitats (Figure 3.12-2e). Impacts include approximately 0.09 acre of disturbed southern willow scrub, 0.02 acre of disturbed mulefat scrub, 0.45 acre of coastal freshwater marsh, 0.0027 acre of coastal freshwater marsh situated within Fairbanks Mitigation Site, 0.33 acre of disturbed coastal freshwater marsh, 1.05 acres of disturbed southern coastal salt marsh, 0.0018 acre of disturbed wetland, and 0.034 acre of tamarisk scrub.

In terms of jurisdictional areas, the Road Capacity and Bicycle Safety alternatives would result in permanent impacts to 1.28 acres and temporary impacts to 0.72 acre of USACE/RWQCB jurisdictional areas. As classified by CDFW, this alternative would result in permanent impacts to 1.33 acres and temporary impacts to 0.80 acre of CDFW jurisdictional areas.

Road and bridge improvement activities would impact a total of approximately 0.445 acre of sensitive upland habitats, including 0.41 acre of disturbed Diegan coastal sage scrub – coastal form and 0.038 acre of disturbed Diegan coastal sage scrub – Baccharis dominated.

Impacts from JPA Mitigation Site. Mitigation for impacts to wetlands resulting from the project would be accomplished on the JPA Mitigation Site; limited impacts to sensitive vegetation communities would occur from the mitigation concept plan (Figure 3.12-2f). Currently, this area supports native and nonnative vegetation communities of low ecological value. The 21.88-acre JPA Mitigation Site was formerly farmed for tomatoes but has been fallow for several years. Recent surveys (July 2013) have demonstrated that the dominant vegetation community on-site may be best described as disturbed Diegan coastal sage scrub – Baccharis dominated using the terminology of Oberbauer et al. (2008). This upland community is strongly dominated by coyote bush (*Baccharis pilularis*) with a high percentage of non-native weedy plant species, including five-hook bassia (*Bassia hyssopifolia*) and tree tobacco (*Nicotiana glauca*). Disturbed Diegan coastal sage scrub – Baccharis dominated comprises 14.3 acres of the 21.88-acre mitigation site. Other upland communities or habitats occurring on the mitigation area include disturbed Diegan coastal sage scrub – coastal form (0.03 acre), disturbed land (3.48 acres) and non-native grassland (0.04 acre).

Wetland habitats currently occurring within the JPA Mitigation Site are isolated, disturbed, and have low functions and values, compared to areas of higher quality habitat associated with the San Dieguito River. These include alkali marsh dominated by alkali weed (*Cressa truxillensis*; 0.48 acre), coastal freshwater marsh (0.05 acre) disturbed coastal brackish marsh (0.08 acre), disturbed southern willow scrub (1.49 acres), disturbed wetland (0.23 acre) and tamarisk scrub (1.69 acres). Impacts to these wetland habitats are necessary in order to convert the parcel into wetland habitats that are of higher value and higher function and are connected to the existing wetlands/riparian corridor associated with the San Dieguito River.

Impacts to sensitive vegetation communities from establishing the mitigation site are listed in Table 3.12-4. Wetland impacts total 2.11 acres. The berm will impact a total of 1.48 acres comprised of 1.13 acres of disturbed Diegan coastal sage scrub – Baccharis dominated, 0.03 ac of disturbed coastal sage scrub – coastal form, 0.22 acre of disturbed land and 0.11 acre of tamarisk scrub. This leaves approximately 20.4 acres available for conversion to wetland habitats as mitigation. Mitigation for impacts associated with the berm will be accomplished through the purchase of credits for 1.16 acres from the City's Cornerstone Lands (1.16 acres of disturbed Diegan coastal sage scrub mitigated at 1:1) and the conversion of higher quality habitat (0.11 ac tamarisk scrub mitigated at 2:1).

In addition to the 0.11 acre of tamarisk scrub impacted by the berm, 2.0 acres of CDFW jurisdictional wetlands will be impacted from implementation of the wetland creation on the JPA Mitigation Site. This includes 1.22 acres of tamarisk scrub, 0.48 acre of alkali marsh, 0.23 acre disturbed wetland and 0.07 acre of disturbed southern willow scrub. Impacts to these low quality habitats are not considered permanent and will be mitigated within the JPA Mitigation Site. The state and federal resource agencies with permitting authority have agreed that 1:1 mitigation for these habitats is acceptable, thus overriding City guidelines as allowed by the 2002 Land Development Code, Biology Guidelines.

Enhancement of 2.0 acres of existing disturbed southern willow scrub habitat by removal of nonnative tamarisk (*Tamarix* sp.) will not result in impacts to this habitat. Creation of 3.0 acres of mulefat scrub/southern willow scrub habitat immediately adjacent to and south of the river would convert primarily tamarisk scrub, disturbed land and disturbed Diegan coastal sage scrub – Baccharis dominated to mulefat scrub/southern willow scrub. The largest component of the mitigation area would entail conversion of primarily Diegan coastal sage scrub – Baccharis dominated and disturbed land to freshwater marsh. Mitigation for impacts to wetlands in the JPA Mitigation Site would be provided at a 1:1 ratio because these impacts would occur as part of an effort to create higher quality wetland habitats. Mitigation for impacts to disturbed Diegan coastal sage scrub will be provided at a 1:1 ratio through purchase of credits from the City's Cornerstone Lands.

3.12.3.2 Issue 1b: Impacts to Sensitive Plant Species

Impacts from Bridge/Road Widening. The project alternatives would result in impacts to sensitive plant species as presented in Table 3.12-5 and summarized below. The loss of these individuals would not threaten the long-term survival of any of the species in the region or within the MSCP subarea.

<u>Western Alignment Alternative</u>. The Western Alignment Alternative would result in direct impacts to four individuals of Palmer's sagewort and one individual of San Diego marsh-elder

<u>Central Alignment Alternative</u>. The Central Alignment Alternative would result in direct impacts to four individuals of Palmer's sagewort and two individuals of southwestern spiny rush.

Eastern Alignment Alternative. The Eastern Alignment Alternative would result in impacts to 41 individuals of southwestern spiny rush.

<u>Roundabout Alternative</u>. The Roundabout Alternative would result in impacts to 16 individuals and a 0.03-acre area of San Diego sunflower and 41 individuals of southwestern spiny rush.

<u>Road Capacity/Bicycle Safety Alternatives</u>. These alternatives would result in direct impacts to four individuals of Palmer's sagewort and two individuals of San Diego sunflower.

Impacts from JPA Mitigation Site. Six San Diego marsh-elder and one southwestern spiny rush would be impacted by mitigation activities at the JPA Mitigation Site.

3.12.3.3 Issue 1c: Impacts to Occupied Habitat of Sensitive Wildlife Species

The project alternatives would result in impacts to occupied habitat for sensitive wildlife as presented in Table 3.12-6 and summarized below.

Western Alignment Alternative. This alternative would result in impacts to occupied habitat for Clark's marsh wren, light-footed clapper rail and least Bell's vireo.

<u>Central Alignment Alternative</u>. This alternative would result in impacts to occupied habitat for Clark's marsh wren, light-footed clapper rail, and least Bell's vireo.

Eastern Alignment Alternative. This alternative would impact occupied habitat for Clark's marsh wren, yellow-breasted chat, light-footed clapper rail, and least Bell's vireo.

<u>Roundabout Alternative</u>. This alternative would result in impacts to occupied habitat for Clark's marsh wren, yellow-breasted chat, light-footed clapper rail, and least Bell's vireo.

<u>Road Capacity/Bicycle Safety Alternatives</u>. These alternatives would result in impacts to occupied habitat for Clark's marsh wren, light-footed clapper rail and least Bell's vireo.

Impacts to Occupied Habitat from JPA Mitigation Site. Implementation of the proposed restoration plan would result in impacts to occupied habitat for northern harrier, yellow warbler, white-tailed kite, light-footed clapper rail, and least Bell's vireo.

Sensitive Resource/ Occurrence Location/ Status	Western Alignment Alternative Impacts	Central Alignment Alternative Impacts	Eastern Alignment Alternative Impacts	Roundabout Alignment Alternative Impacts	Road Capacity/ Bicycle Safety Alternatives* Impacts	JPA Mitigation Site
Palmer's sagewort (<i>Artemisia palmeri</i>) Occurs in disturbed mulefat scrub and disturbed southern willow scrub. CRPR 4.2	4 individuals	4 individuals	None	None	4 individuals	None
San Diego sunflower (<i>Bahiopsis laciniata</i>) Occurs in disturbed Diegan coastal sage scrub – coastal form. CRPR 4.2	None	None	None	16 individuals and a 0.03-acre patch	2 individuals	None
San Diego marsh-elder (<i>Iva hayesiana</i>) Occurs in disturbed and undisturbed coastal freshwater marsh. CRPR 2.2	1 individual	None	None	None	None	6 individuals
Southwestern spiny rush (Juncus acutus ssp. leopoldii) Occurs in disturbed and undisturbed coastal freshwater marsh and disturbed southern willow scrub. CRPR 4.2 CRPR = California Rare Plant Ra	None	2 individuals	41 individuals	41 individuals	None	1 individual

Table 3.12-5 Summary of Impacts to Sensitive Plant Species

Source: ICF/Nordby 2015 (*Note: Data for Road Capacity and Bicycle Safety Alternatives compiled by RECON separately from ICF/Nordby 2015)

Sensitive Resource/ Occurrence Location/ Status	Western Alignment Alternative Impacts	Central Alignment Alternative Impacts	Eastern Alignment Alternative Impacts	Roundabout Alignment Alternative Impacts	Road Capacity/ Bicycle Safety Alternatives* Impacts	JPA Mitigation Site
Northern harrier (<i>Circus cyaneus</i>) Occurs throughout the BSA. SSC	None	None	None	None	None	Create/ enhance suitable habitat
Clark's marsh wren (<i>Cistothorus palustris</i> <i>clarkae</i>) Occurs in disturbed and undisturbed coastal freshwater marsh. SSC	Remove occupied habitat	Remove occupied habitat	Remove occupied habitat	Remove occupied habitat	Remove occupied habitat	Create/ enhance suitable habitat
Yellow warbler (<i>Dendroica petechia</i>) Occurs in disturbed mulefat scrub and disturbed southern willow scrub. SSC	Remove suitable habitat	Remove suitable habitat	Remove suitable habitat	Remove suitable habitat	Remove suitable habitat	Create/enhance suitable habitat
White-tailed kite (<i>Elanus leucurus</i>) Occurs in disturbed Deigan coastal sage scrub - Baccharis dominated. CFP	None	None	None	None	None	Create/Enhance foraging habitat
Yellow-breasted chat (<i>Icteria virens</i>) Occurs in disturbed mulefat scrub and disturbed southern willow scrub. SSC	Remove suitable habitat	Remove suitable habitat	Remove occupied habitat	Remove occupied habitat	Remove suitable habitat	Create/enhance suitable habitat

Table 3.12-6 Summary of Impacts to Sensitive Wildlife Species

	Western	Central	Eastern	Roundabout	Road Capacity/	
Sensitive Resource/	Alignment	Alignment	Alignment	Alignment	Bicycle Safety	
Occurrence Location/	Alternative	Alternative	Alternative	Alternative	Alternatives*	
Status	Impacts	Impacts	Impacts	Impacts	Impacts	JPA Mitigation Site
Light-footed clapper rail						
(Rallus longirostris levipes)						
Occurs in disturbed and	Remove occupied	Create/enhance				
undisturbed coastal	habitat	habitat	habitat	habitat	habitat	occupied habitat
freshwater marsh.						
FE, SE, CFP						
Least Bell's vireo						
(Vireo bellii pusillus)						
Occurs in disturbed mulefat	Remove occupied	Create/enhance				
scrub, disturbed southern	habitat	habitat	habitat	habitat	habitat	occupied habitat
willow scrub.						
FE, SE						
Nesting Birds and Raptors	Remove suitable	Create/enhance				
May occur throughout the	nesting habitat	suitable nesting				
BSA.	nesting natitat	habitat				
Status:						
FE = Federally endangered						
SE = State endangered						
SSC = State Species of Specia	al Concern					
CFP = State Fully Protected						

Table 3.12-6 Summary of Impacts to Sensitive Wildlife Species (continued)

Source: ICF/Nordby 2015 (*Note: Data for Road Capacity and Bicycle Safety Alternatives compiled by RECON separately from ICF/Nordby 2015)

3.12.3.4 Issue 1d: Direct Impacts to Sensitive Wildlife

As discussed in more detail in Section 3.12.5 of this recirculated EIR, in order to avoid and minimize impacts to nesting bird species in the BSA, mitigation and construction activities occurring outside of the river corridor would be restricted during the nesting season (February 1 through August 31) in accordance with the MBTA and City of San Diego policies. If vegetation removal is to occur between February 1 and August 31, a nesting bird survey would be conducted prior to removal of vegetation between the banks of the river which defines the river corridor. Direct impacts to most sensitive species would be avoided through project restrictions during the bird breeding season.

As the light-footed clapper rail is a permanent resident of regional marshes (non-migratory), avoidance of work during its breeding season does not ensure avoidance of direct impacts. However, multiple general and specific measures to avoid and minimize impacts to light-footed clapper rail would be implemented, including fencing, maintenance of a wildlife corridor, and monitoring to verify wildlife is not entrapped. Detailed measures are presented in Section 3.12.5 of this recirculated EIR. With implementation of these measures, no direct impacts to light-footed clapper rail are anticipated. In addition, formal consultation with the USFWS will be required pursuant to Section 7 of the FESA in order to develop final avoidance and mitigation measures for the federally and state endangered and state fully protected light-footed clapper rail. The project must comply with CDFW requirements pursuant to Section 4700 of the CDFW Code for Fully Protected Species. It must be demonstrated that the project will not result in take of this species.

Features of the proposed mitigation site would add to protection of the light-footed clapper rail. A permanent earthen berm would be created within the JPA Mitigation Site in order to protect the created marsh habitats from sediment deposition. The berm would be open on the western end and an armored weir would be constructed within the berm, approximately 7 feet lower than the top of the berm. Light-footed clapper rail would be able to enter the mitigation area from the river through the western end of the berm or by walking over the berm and weir. Light-footed clapper rail are known to utilize upland areas such as levees banks (similar to the weir) in order to seek refuge from high flows or while foraging.

The JPA Mitigation Site is situated west of the road alignments proposed for all alternatives, and adjacent to the San Dieguito River outside of the actual river channel. Unlike the currently occupied coastal freshwater marsh, the mitigation area would be protected by the permanent earthen berm from strong flows in the river channel that could result in damage to the vegetation. Flow velocities through the mitigation area would be low and should have limited effects on scour, even during larger storm events (Rick Engineering 2012).

The transmission lines that that occur within the utility corridor to the west of the JPA Mitigation Site have been observed to provide perches for red-tailed hawk and other raptors that prey on clapper rail chicks. However, removal of this transmission line and the buried utilities beneath the line is infeasible. Numerous potential perches, including tall *Eucalyptus* trees, telephone poles, and structures, occur along the approximately 1-mile stretch of the river from El Camino Real upstream to Morgan Run Golf Course, yet the clapper rail population appears to be more at risk from terrestrial predators, e.g., raccoons, than from aerial predators (see Zembal and Hoffman 2012). In the project area, areas of dense vegetation with more open areas for foraging appear to be important characteristics of this habitat for clapper rails. The restoration plan proposes to create a similar mosaic at the mitigation site with sufficient cover to provide refuge from most aerial predators.

3.12.3.5 Issue 1e: Impacts to Sensitive Wildlife from Construction Noise

Construction of the new bridge and demolition of the existing bridge would be conducted during the non-breeding season (October 1 – January 31); however, construction of the road widening and approaches to the bridge would occur during the breeding season. In order to meet the Wildlife Agencies requirement that noise from construction may not exceed 60 dBA at the edge of the river during breeding season, noise modeling was conducted. Appendix J of the NES presents the analysis in detail; results are summarized below.

All build alternatives will require construction activities within the San Dieguito River or elevated above and across the river. Two options have been identified to accomplish this requirement: 1) earthen berms that cross the river, or 2) elevated trestles that cross the river. These features are considered necessary to provide a stable pad for construction of the new bridge and demolition of the existing bridge, as presented in detail in Appendix D of this recirculated EIR.

Under the berm option, the contractor would build a single temporary earthen berm or multiple berms that would run perpendicular and across the river bottom to provide working pad area(s) approximately 30 feet east and 30 feet west of the proposed bridge. The total width of the berm(s) would vary based on the height of the fill placed, but it is anticipated that these berm(s) would be approximately 10 feet above the existing river bottom and would extend approximately 30 feet outside of the proposed built edge of the bridge deck on each side of the bridge, thus would be approximately 150 feet wide at the top if a single berm was used. The berm(s) would extend from the north bank to the south bank of the San Dieguito River, with a least one opening of approximately 40 feet in width to allow for river flows and for use as a wildlife corridor. It is estimated construction of the berms for constructing the bridge would take 1 to 2 months. Using the berm and the embankment, the contractor would construct the piles, columns, and place temporary falsework for the constructed on the berm on spread footings. If the berms are not stable enough, piles driven through the berm would be required to support the bridge superstructure.

Under the trestle option, driven piles would be required for support of both an elevated trestle on both sides of the bridge that provide access in a manner similar to the berm and for support of the falsework beneath the bridge, effectively doubling the number of piles needed for bridge construction. Piles are long, slender timber, concrete, or steel structural elements that are driven or otherwise embedded on end in the ground for the purpose of supporting a load or compacting the soil. The trestle would provide a 30-foot-wide stable platform on each side of the bridge across the entire width of the river. This option would allow unimpeded flows in the river and unimpeded movement by wildlife during the 2.5- to 3.5-year construction process. Approximately 700-800 temporary, 20-inch-diameter steel piles would be driven for this option using an either a diesel-driven impact hammer or a quieter hydraulic impact hammer. Driving the piles with an impact hammer will be necessary to ensure they have the capacity to support the heavy equipment necessary to construct the bridge. Additional piles would be needed to demolish the existing bridge.

One the new bridge is constructed and the old bridge removed, all piles would be removed utilizing vibratory pile extraction. Vibratory pile drivers/extractors contain a system of counterrotating eccentric weights, powered by hydraulic motors, and are designed in such a way that horizontal vibrations cancel out, while vertical vibrations are transmitted into the pile. The pile driving/extracting machine is lifted and positioned over the pile and is fastened to the pile by a clamp and/or bolts.

The noise model indicates that noise from construction activities unrelated to pile driving (grading, paving bridge construction, bridge demolition) are approximately 60 dBA at 50 feet from the source using noise state-of-the-art noise attenuation measures (Figure 3.12-3). The construction noise modeling is based on reference noise levels that were measured from actual pieces of equipment at 50 feet away. Fifty feet is a practical distance that most receptors would be located from heavy construction equipment due the nature of a typical construction site and the mobility of equipment. The noise calculations are based on composite noise levels combining numerous types and pieces of equipment. The inverse square law of noise propagation, which applies to energy that is radiated outward, is used to determine noise levels farther away from the source. Thus, with noise attenuation measures, such as noise walls, it is predicted that construction activities can occur approximately 50 feet from the edge of the river during the breeding season.

Noise modeling indicates that noise from pile driving may exceed 60 dBA at a distance of approximately 1,200 from the source for hydraulic pile drivers (Figure 3.12-4) and more than 4,000 ft from the source for diesel-driven pile drivers (Figure 3.12-5). Piles removed using vibratory pile extractors would result in noise levels within occupied clapper rail habitat greater than 60 dBA within approximately 800 feet of the pile extractor. Details on noise associated with pile driving and extraction are presented in Appendix J of the NES. Potential impacts for each species are summarized below.

<u>Northern Harrier</u>. Northern harriers foraging in the project area during the non-breeding season (September 1 through January 31) would be subjected to indirect impacts of noise and vibration from hydraulic pile driving activities. It is possible that this mobile species will relocate should such indirect impacts prove disruptive; however, it is also possible that noise and vibration will not prove disruptive. It is not anticipated that indirect impacts would result in harm to northern harrier.

<u>Clark's Marsh Wren</u>. Clark's marsh wren foraging in the project area during the non-breeding season (September 1 through January 31) would be subjected to indirect impacts of noise and vibration from hydraulic pile driving activities. It is possible that this mobile species will relocate should such indirect impacts prove disruptive; however, it is also possible that noise and vibration will not prove disruptive. It is not anticipated that indirect impacts would result in harm to Clark's marsh wren.

<u>Yellow Warbler</u>. Yellow warbler is a migratory species that would be unlikely to occur in the project area during the non-breeding season. Therefore, indirect impacts of noise and vibration from hydraulic pile driving activities are not anticipated.

<u>White-tailed Kite</u>. White-tailed kite foraging in the project area during the non-breeding season (September 1 through January 31) would be subjected to indirect impacts of noise and vibration from hydraulic pile driving activities. It is possible that this mobile species will relocate should such indirect impacts prove disruptive; however, it is also possible that noise and vibration will not prove disruptive. It is not anticipated that indirect impacts would result in harm to White-tailed kite.

<u>Yellow-breasted Chat</u>. Yellow-breasted chat is a migratory species that would be unlikely to occur in the project area during the non-breeding season. Therefore, indirect impacts of noise and vibration from hydraulic pile driving activities are not anticipated.

<u>Least Bell's Vireo</u>. As least Bell's vireo are migratory, they would not be present in the project area during the non-breeding season. Therefore, indirect impacts from noise and vibration associated with pile driving activities are not anticipated.

<u>Light-footed Clapper Rail (Ridgway's Rails)</u>. As the light-footed clapper rail is a permanent resident of regional marshes (non-migratory), avoidance of work during the breeding season does not ensure avoidance of indirect impacts. Noise and vibration from pile driving may affect the behavior of the rail. It is not known for certain how many individual Ridgway's rails use the portion of the river within 1,200 to 4,000-ft of proposed pile driving locations (which vary with bridge alternatives) as individual rails move about within the river while foraging; however, based on the 2012 distribution of Ridgway's rails in the Project area (Figure 3.12-6), noise from diesel-driven pile drivers would exceed 60dBA at the locations of 17 pairs and 17 individual rails. Noise from hydraulic pile driving would exceed 60 dBA at the locations of nine individual rails and six paired rails. Thus, noise from pile-driving would exceed 60 dBA at the locations of nine individual rails construction and demolition, depending on which type of pile driver is used. This noise may affect the resident population of light-footed clapper rails (see Figure 3.12-6 and also Figure 11 in the NES which is included in Volume 2 of the Recirculated Draft EIR).

It also cannot be known how individual rails that might occur within this portion of the river during pile driving activities might react to noise and vibration without actually subjecting them to such noise and vibration. Extensive research indicates that this is the only bridge replacement project proposed or constructed that would traverse a population of light-footed clapper rails.

It is possible that rails subjected to noise and vibration will move away from the source, presumably farther east or west of the bridge. If the occupied habitat is at or near carrying capacity, i.e., supports the maximum density of rails possible, it is possible that the individuals seeking to escape the noise/vibration will encounter other individual rails that may contest their presence. It is further possible individual rails would be displaced and would have to seek unoccupied habitat, if any, or displace yet another individual or individuals. Any potential displacement may temporarily disrupt foraging and, depending on the extent of displacement, may temporarily disrupt breeding of some pairs. It is not anticipated that displacement would result in injury or death. However, should the rail or rails seek to escape noise or vibration by moving into upland habitats, the potential for death or injury from terrestrial and avian predators could increase.

It is also possible that the rails will tolerate the noise or vibration. With no data available from similar projects, the effects of potential displacement of an unknown number of individuals on other dynamics of the clapper rail population in the project area, such as the genetic diversity or reproductive productivity of the population, can only be conjecture. Many other factors may affect genetic diversity and productivity. For example, in the hypothetical case of the population for resources increases. Population decline may occur for other reasons, such as continued spread of invasive tamarisk that supports raccoons and other predators of the rail. This example illustrates the difficulty in determining cause-and-effect of shifts in a population of such a secretive species. Should the project proceed and a detectable decline occurs in the clapper rail population, there can be no certainty of its cause. As stated by Zembal and Hoffman (2012) this particular

population of clapper rails has fluctuated widely in terms of numbers since it was reported in 2004. The reasons for these fluctuations are not known, but could be attributable to the factors discussed above. Potential indirect impacts to this species would be significant but mitigable. The City proposes to work with the Wildlife Agencies to implement any and all feasible measures to avoid, minimize and mitigate potential project impacts to light-footed clapper rail.

3.12.3.6 Issue 1f: Impacts of River Hydraulics on the Light-footed Clapper Rail

Several studies have been conducted of the hydraulics of the river in the project area, most recently in a May 2013 study of river hydraulics during bridge construction prepared by Rick Engineering which is included in Volume III of the EIR and summarized in Appendix D. This report and a previous report prepared in April 2012 by Rick Engineering was prepared in response to comments by the Wildlife Agencies regarding the proposed JPA Mitigation Site. As noted in Section 3.12.3.5 of this recirculated EIR, all build alternatives will require construction activities within the San Dieguito River, and two options have been identified to accomplish this requirement: 1) earthen berms that cross the river, or 2) elevated trestles that cross the river. Temporary construction berm and trestle options are described in Appendix D and summarized in Section 2.2.15 of this recirculated EIR. Two scenarios for each option (berm or trestle) were modeled hydraulically. Results of the hydrologic and hydraulic modeling during construction and upon project completion and consequent conclusions regarding impacts on the San Dieguito River are discussed in Section 3.7, Hydrology/Water Quality. Chapter 4 of the NES presents a detailed discussion regarding river hydraulics and the potential effect of the project on the lightfooted clapper rail. This discussion is summarized below.

The freshwater marsh habitat that occurs within the banks of the San Dieguito River in the project area supports the third largest population of light-footed clapper rail in southern California. It has been postulated that there are certain physical and biological characteristics of the river in the project area that have resulted in development of freshwater marsh habitat that is particularly attractive to the rail. Physical characteristics may include, but are not limited to, the hydraulics of the river in this area, specifically water surface elevations and velocities during low flow periods and during periods of higher flows associated with storm events. Biological factors may include, but are not limited to, the structure of the freshwater marsh habitat. That structure may be described as dense, tall vegetation that provides cover for this secretive species combined with more open areas where the rails may forage. Due to the sensitivity of the clapper rail, it is critical that these characteristics be maintained during and after construction of the proposed bridge.

Hydraulic models were prepared for the existing and temporary construction alternatives condition, analyzing 100-, 50-, 10-year utilizing FEMA flow rates of 42,800, 32,500 and 5,900 cfs, respectively, and 2-, 1.3-, and 1.0-year storm events utilizing flow rates from the hydrologic study with flow rates of 3,450, 1,624 and 426 cfs, respectively. The hydraulic modeling conducted for construction and post-construction of the bridge is based on the conceptual design of the bridge and conceptual construction methods. Hydraulic modeling would be refined and verified once the final design is completed and construction methodology determined. Another consideration for the temporary construction alternatives is comparing their capacity to convey the daily low-flows in the San Dieguito River. Therefore, the average daily flow-rates were also identified, and a flow rate of 7.4 cfs was used in the model. The Eastern Alignment Alternative (and therefore also the Roundabout Alternative) was selected as the focus of the construction hydraulic modeling. For these alternatives, the bridge construction would occur at the most upstream (most eastern) location. Potential impacts on water surface elevations would therefore extend the farthest upstream (to the east) in the San Dieguito River, representing the most conservative (worst case) hydraulic impacts for environmental analysis.

Hydraulic modeling of two berm and two trestle construction options found that in each temporary construction condition, the smallest 1.0-year storm event (peak flow rate of 462 cfs) could be conveyed, and it is not anticipated that the daily low flows within San Dieguito River would surpass the lowest capacity of the proposed temporary construction berm alternative. All storm events equal or less than the 10-year were found to have velocities that are primarily still non-erosive with all of the berm or trestle options modeled. Low flow, non-erosive river conditions provide the physical conditions that support the habitat favored by the clapper rail.

For most higher flood events, including the 10-year, 50-year, and 100-year events, water surface elevations would increase by more than one foot due to the obstruction of the berm deck, anticipated fill in the river and decreasing the conveyance of the river in the area of disturbance for the berm options, and obstruction of the trestle construction and the decrease of the conveyance due to the piles that support the trestle deck for the trestle options. To reduce the risk from higher flood events, the berm could be designed to wash out similar to the riverbed characteristics reflected in previous sediment transport analyses, and therefore not stand up to high flows and increase water surface elevations upstream.

The choice of construction techniques, e.g., trestle(s) or berm(s) may affect functioning of clapper rail habitat following construction. Removal of the berm to preconstruction contours following construction is essential for maintaining the unique hydraulic and biological characteristics of the project area. Removal of soils that have been compacted may result in rebound, forming higher areas where the berms had been. Anticipating such a rebound that does not occur may result in areas that are lower than preconstruction contours resulting in deeper water where the berms had been. Fixing either condition would be difficult once the berm has been removed. Vibrating temporary piles out of the river may result in holes where the piles previously had been, resulting a series of low areas across the river. With no access to the river bottom, filling these holes to preconstruction contours may not be possible.

Once the construction is complete and the temporary berm or trestle systems are removed, hydraulic modeling indicates the constructed project would not affect river hydraulics for the 10-year flood. During the 10-year flood event, water surface elevations in the channel are roughly equal to the elevation of the existing river banks. Thus, in a 10-year event, clapper rails would be forced from the river channel into adjacent uplands where they would be susceptible to predation by terrestrial and avian predators, or be swept downstream. This would occur under both existing and proposed conditions.

During the 100-year flood, water surface elevations would not be greater with the project than under existing conditions. During the 100-year flood event, the area upstream of the existing and proposed bridge would be submerged from approximately San Dieguito Road to the south to Via De La Valle to the north. Similarly the area downstream of the bridge would be submerged from approximately El Camino Real to Via De La Valle to the north. Clapper rails would be forced onto roadways and private properties where they would be susceptible to predation and/or injury from other sources, or they would be swept downstream. This would occur under both existing and proposed conditions.

The project would increase 100-year event velocities and thus increase the potential for erosion in the river from the vicinity of the existing bridge to upstream of the location of the Eastern Alignment Alternative bridge. Bank protection discussed in Section 3.7 of this recirculated EIR is proposed to mitigate for this issue. The increased erosion upstream and downstream of the proposed bridge would affect only a small portion of occupied clapper rail habitat and the extent of those impacts can only be speculated. Dr. Chang's Fluvial 12 model (Chang 2005)

demonstrated how the river bed scours during the peak of the 100-year event, then resumes its pre-flood profile as the discharge lessens and sediment is deposited. Thus, it is possible that there would be little or no change in the bed profile following the 100-year event. However, the freshwater marsh habitat in the river channel that provides cover and food for the rail would likely be scoured away by erosional water velocities precluding use by rails in the short term until vegetation becomes reestablished. This would likely occur under both existing and proposed conditions. The vegetation within the JPA Mitigation Site protected by the permanent berm and weir is not expected to scour due to lower velocities allowed by the permanent berm and weir. Thus, this area would provide rail habitat immediately following the receding flood waters.

3.12.3.7 Issue 1g: Impacts from Invasive Species

Following the California Invasive Plant Council (Cal-IPC) (Cal-EPPC 1999) classification, 29 of the 99 species of plants observed within the project study area are classified as invasive plant Seeds of invasive species can be transported to new areas through a variety of species. mechanisms including vehicles and animals. Recurring fires can encourage the establishment of invasive species as well as some forms of routine land maintenance (e.g., discing). The impacts invasive species have on southern California native vegetation communities and the plants and animals that reside within these areas are in some circumstances catastrophic. Such species invade natural communities throughout California, and these species can replace native habitat needed by wildlife, increase wildfire and flood danger, and destroy productive range and timberlands. Roads, highways, and related construction projects are some of the principal dispersal vectors for invasive plant species under both existing and proposed conditions. Also, because the BSA currently supports extensive areas of non-native species, in particular salt cedar (Tamarix ramosissima) and tree tobacco (Nicotiana glauca), control of such species during and after construction is critical to preventing establishment in the project area, including the JPA Mitigation Site.

3.12.3.8 Issue 2: Impacts to Wildlife Corridors

During bridge construction, if temporary berms would be employed for access across the San Dieguito River, a minimum of one 40-foot-wide corridor would be bridged to allow river low flow and to allow rails and other species to move east and west along the river corridor. If the trestle option would be employed, wildlife movement could occur between parallel rows of driven piles.

Because a minimum of one passageway would be built into the temporary work area within the river channel, terrestrial wildlife species, such as light-footed clapper rail, would be able to travel through the work area and wildlife would continue to have access to areas upstream and downstream of the work area within the San Dieguito River corridor. Temporary fencing would be installed parallel to the passageway to discourage wildlife from accessing the construction areas. It is possible that the construction berm may limit local movement of clapper rails despite inclusion of a 40-foot-wide bridged low flow/wildlife corridor, and construction activities would likely disrupt full use of this portion of the San Dieguito River channel as a wildlife corridor. However, this disruption would be temporary because construction activities within and over the river would be restricted to the non-breeding season of sensitive bird species and to daylight hours, and the proposed passageways would allow wildlife to continue to move through the area.

For some construction activities, equipment can be removed from the river channel at the end of each work day. However, it is not practical to remove the crane and the platform needed for some work activities at the end of each work day. These would only be removed when the predicted chance of precipitation is great than 50 percent for 0.5 inch of rain or greater. Secondary containment measures would be installed underneath the crane at the end of each work day. Such measures may include placing a plastic reservoir that extends the width and length of the underside of the crane that has the capacity to contain up to 120 percent the amount of liquid in the crane.

The San Dieguito River would function as a wildlife corridor without interruption during the breeding season (February 1 through September 30) and in the night during construction in the non-breeding season (October 1 through January 31). Wildlife would be able to move freely through the area once the project is completed.

3.12.3.9 Issue 3: Impacts to MHPA Areas

General Compliance. The long-term conservation of biological resources is addressed by compliance with the MSCP and MHPA established within the City boundaries to delineate core biological areas and corridors targeted for conservation. Conformance of the project to the MSCP requirements and MHPA guidelines is evaluated in Section 3.1.3 of this recirculated EIR. To summarize, the proposed project would conform to the land use guidelines and existing management plans provided in the City's Subarea Plan and thus would be considered a land use compatible with the goals of the MSCP, with the exception of the Western Alignment Alternative which proposes the storage of materials in the MHPA (an issue that could be mitigated by installation of secondary containment measures). Where mitigation is required for MSCP conformance, specific measures to be implemented upon project construction are described in detail in Chapter 4 of the NES and Section 3.12.5 of this recirculated EIR.

MSCP Covered Species. Covered species are those that are considered adequately protected within the City of San Diego MSCP provided that they are conserved according to the conditions of coverage provided in the City's MSCP Subarea plan. Light-footed clapper rail, least Bell's vireo, and northern harrier, all of which are present in the BSA, are covered by the MSCP. Thus, project compliance with the MSCP will require conformance to the following conditions of coverage:

<u>Light-footed Clapper Rail (Ridgway's Rails).</u> This species is considered covered by the MSCP because 93 percent of its potential habitat, including southern coastal salt marsh, will be preserved by the MSCP plan.

Area Specific Management Directives (ASMDs) for this species from the City's MSCP Subarea Plan would apply as follows:

1) Measures to protect nesting sites from human disturbance during the reproductive season.

Compliance: Construction activities are anticipated to occur during the breeding season of the Ridgway's rail (*Rallus obsoletus*). Direct impacts to Ridgway's rail would be avoided by implementing measures to restrict access to the construction area such as no clearing of habitat during the breeding season, through the use of temporary exclusionary fences, daily clearance surveys, and on-going monitoring of construction activities. Indirect impacts from sources such as noise and altered hydrology have the potential to affect resident Ridgway's rails in the vicinity of the project. Noise attenuation measures to reduce the effects of construction noise on Ridgway's rail have been proposed, with additional measures to be developed in coordination with the resource agencies. Similarly, measures to reduce the effects of noise and vibration from pile driving have been considered. Temporary changes in the hydrology of the San Dieguito

River in the vicinity of the project during construction would be addressed through the use of temporary berms or trestles, reducing the potential effects of altered hydrology on the rails and their habitat.

2) Measures to protect against detrimental edge effects.

Compliance: The JPA Mitigation Site includes permanent berms to protect the mitigation site from edge effects due to flood scour and human encroachment. The bridge itself will be well above the adjacent habitat areas, making it difficult for humans to access the habitats areas. Potential future equestrian trails will be located above and along the perimeter of habitat area to reduce the potential for encroachment. Once the bridge is complete, noise impacts would return to pre-construction levels and are not anticipated to effect the nearby rail population. As the new bridge replaces an existing bridge, the pre-construction condition already tolerated by the adjacent rail population is anticipated to be the same after the new bridge is complete.

Wetland regulations that require no-net-loss of wetlands will provide additional protection for this species. The proposed project conforms to the conditions of coverage established for this species because proposed mitigation would result in no-net-loss of wetlands. In the project area, potential light-footed clapper rail habitat consists of coastal freshwater marsh. Construction of the Western Alignment, Central Alignment, and narrow roadway alternatives would span three breeding seasons, and construction of the Eastern Alignment and Roundabout alternatives would span two breeding seasons. However, construction activities for all alternatives would be restricted in the river corridor during the combined bird nesting season (February 1 to September 30), thereby avoiding the nesting season for light-footed clapper rail. Exclusionary fence would be installed along the perimeter of the temporary work corridor within the river prior to construction activities commencing in this area during the non-nesting season. Clearance surveys would be conducted daily during installation of the fence and during removal of vegetation in this area. A qualified biologist would monitor construction activities for the duration of the project to ensure that practicable measures are being employed to avoid incidental disturbance of habitat outside of the project footprint.

No project activities would be allowed during the breeding season for this species within any portion of the site where activities would result in noise levels exceeding 60 dB L_{eq} (or the ambient noise levels if they already exceed 60 dB L_{eq}) at the edge of the occupied habitat. If necessary, noise attenuation measures, such as berms or noise walls, can be implemented to ensure that noise levels would be maintained within the allowable level. To offset anticipated project impacts to this habitat, coastal freshwater marsh would be restored, created, or enhanced at a 4:1 ratio. Mitigation would be accomplished at the JPA Mitigation Site.

<u>Least Bell's Vireo.</u> This species is covered by the MSCP because 81 percent of its potential habitat, including riparian woodland and oak riparian forest, will be preserved by the MSCP plan.

ASMDs for this species from the City's MSCP Subarea Plan would apply as follows:

1) Measures to provide appropriate successional habitat and upland buffers for known populations.

<u>Compliance:</u> Suitable successional willow riparian vegetation would be established at the mitigation site along with vegetated upland buffers to provide habitat for the local least Bell's vireo population.

2) <u>Measures to provide cowbird control.</u>

<u>Compliance:</u> The requirement for cowbird control and an implementation plan will be evaluated during the environmental review and forthcoming Section 7 consultation with the USFWS for the project.

3) Measures to protect against detrimental edge effects.

Compliance: The JPA Mitigation Site includes berms to protect the mitigation site from edge effects due to flood scour and human encroachment. The bridge itself is an existing structure and the proposed design provides for a higher structure well above the adjacent habitat areas, making it difficult for humans to access the habitats areas. Trails are not proposed by the project. Potential future equestrian trails would be above and along the perimeter of habitat area to reduce the potential for encroachment. Once the bridge is complete, noise impacts would return to preconstruction levels and are not anticipated to effect the nearby vireo population. As the new bridge replaces an existing bridge, the pre-construction condition already tolerated by the adjacent vireo population is anticipated to be the same after the new bridge is complete.

Wetland regulations that require no-net-loss of wetlands will provide additional protection for this species. The proposed project conforms to the conditions of coverage established for this species because proposed mitigation would result in no-net-loss of wetlands. Mitigation for anticipated project impacts to riparian scrub habitats would be provided at a 3:1 ratio. Mitigation would be accomplished within the San Dieguito River watershed. Construction of the Western Alignment, Central Alignment, and narrow roadway alternatives would span three breeding seasons, and construction of the Eastern Alignment and the Roundabout alternatives would span two breeding seasons. Indirect impacts to the least Bell's vireo can be avoided by restricting project activities during the combined bird nesting season (February 1 to September 30). No clearing or grubbing of occupied least Bell's vireo habitat would be allowed between February 1 and September 30. Furthermore, no project activities would be allowed during the breeding season for this species within any portion of the site where activities would result in noise levels exceeding 60 dB L_{eq} (or the ambient noise level if they already exceed 60 dB L_{eq}) at the edge of the occupied habitat. If necessary, noise attenuation measures, such as berms or noise walls, can be implemented to ensure that noise level would be maintained within the allowable level.

<u>Northern Harrier</u>. This species is covered by the MSCP because 42 percent of potential nesting habitat, including salt marsh, freshwater marsh, and grasslands, and approximately 85,000 acres of its potential foraging habitat will be conserved.

ASMDs for this species from the City's MSCP Subarea Plan specific for lands within the MHPA preserve would apply as follows:

1) Manage agricultural and disturbed lands within four miles of nesting habitat to provide foraging areas.

Compliance: MHPA lands occur to the west and south of the proposed project and include the JPA Mitigation Site, which is proposed for restoration and creation of habitat. Although the JPA Mitigation Site was previously farmed agricultural fields, as stated in Section 3.1.2.1, Existing Land Uses, of the Draft EIR, no agricultural lands occur in the MHPA in the vicinity of the project, and the disturbed lands to the west of the project in the MHPA are part of an actively

used dirt parking lot for the Horse Park which makes in unsuitable as a nesting area for this species. Therefore, the project is in compliance with this ASMD.

2) Include an impact avoidance area (minimum 900 feet) within the preserve around active nests.

Compliance: The proposed project would not have direct impacts on MHPA preserve lands to the west. Pre-construction nest surveys are required to be conducted if construction activities are to occur during the breeding season of this species. Protective measures are required to be implemented if an active northern harrier nest is detected.

3) Include measures to maintain winter foraging habitat in MHPA preserve areas in Proctor Valley, around Sweetwater Reservoir, San Miguel Ranch, Otay Ranch, Lake Hodges, and San Pasqual Valley.

Compliance: The proposed project is not located in MHPA preserve areas in any of the identified regional locations.

In order to avoid and minimize impacts to nesting bird species in the BSA, mitigation and construction activities would be restricted during the nesting season (February 1 through August 31) in accordance with the MBTA and City of San Diego policy. If vegetation removal is to occur between February 1 and August 31, a nesting bird survey would be conducted prior to removal of vegetation. According to the City of San Diego Biology Guidelines (City of San Diego 2002), for areas within the MHPA, a 900-foot buffer would be placed around the nesting site of northern harrier, and no construction activities would occur within the buffer until the nest is no longer active. The proposed habitats that would be created within the JPA Mitigation Site would provide suitable foraging habitat and potentially suitable nesting habitat for this species.

3.12.3.10 No Build Alternative

Under the No Build Alternative, none of the project components that could disturb existing biological resources would be constructed, including the wetlands mitigation. Impacts to existing biological resources would not occur.

3.12.4 Significance of Biological Resources Impacts under CEQA

3.12.4.1 CEQA Significance Thresholds

The thresholds for significant biological resources impacts under CEQA are provided in the City of San Diego Significance Determination Thresholds (City of San Diego 2011), as follows: Project impacts to biological resources are determined to be significant if the proposed project would result in:

- 1. A substantial adverse impact, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in the MSCP or other local or regional plans, policies or regulations, or by the CDFG (now CDFW) or USFWS.
- 2. A substantial adverse impact on any Tier I Habitats, Tier II Habitats, Tier IIIA Habitats, or Tier IIIB Habitats as identified in the Biology Guidelines of the Land Development manual or other sensitive natural community identified in local or regional plans, policies, regulations, or by the CDFW or USFWS.

- 3. A substantial adverse impact on wetlands (including, but not limited to, marsh, vernal pool, riparian, etc.) through direct removal, filling, hydrological interruption, or other means.
- 4. Interfering substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, including linkages identified in the MSCP Plan, or impede the use of native wildlife nursery sites.
- 5. A conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan, either within the MSCP plan area or in the surrounding region.
- 6. An introduction of land use within an area adjacent to the MHPA that would result in adverse edge effects.
- 7. A conflict with any local policies or ordinances protecting biological resources.
- 8. An introduction of invasive species of plants into a natural open space area.

3.12.4.2 Determination of Significance under CEQA

The conclusions of significance under CEQA for the alternatives analyzed are summarized in Table 3.12-7 and discussed below.

- 1. Impacts to species identified as a candidate, sensitive, or special status species would involve direct impacts to the habitat of the species addressed above, including least Bell's vireo and the light-footed clapper rail. These impacts would be significant but mitigable by measures implemented to create, restore, and enhance habitat as discussed in Section 3.12.5. No direct impacts to sensitive wildlife species are anticipated. Potential indirect impacts to sensitive wildlife species would be significant but mitigable. Consultation with the wildlife agencies will be conducted in order to appropriately address potential project impacts and mitigation for all potential impacts sensitive wildlife, including to the state fully protected light-footed clapper rail. Proposed measures to mitigate for indirect project impacts during construction are discussed in Section 3.12.5. The project will prohibit construction in the river corridor during avian breeding seasons. In addition, noise from project construction activities at other locations in the project footprint (outside of the river corridor) will not be allowed to exceed 60 dBA at the river corridor during the clapper rail and least Bell's vireo breeding seasons.
- 2. There are no Tier I or Tier IIIA or Tier IIIB Habitats in the project area. Impacts to Tier II Habitats would involve direct impacts to disturbed Diegan coastal sage scrub. Although the remnant Diegan coastal sage scrub habitat found in the project area would be considered of low ecological value, a portion of the impacts to this habitat are located in the MHPA and thus are considered significant but mitigable.
- 3. Project impacts to riparian scrub and coastal wetland habitats would be significant but mitigable. These habitats are protected under section 404 of the Clean Water Act. Mitigation requirements for impacts to wetland habitats will continue to be refined in coordination with the regulating resource agencies.

- 4. Wildlife corridor impacts are considered to be not significant. The San Dieguito River currently serves as a wildlife corridor. Retention of this function during and after project construction is of importance to wildlife species dependent on the river. Measures to ensure that the wildlife corridor remains functional during project construction include prohibiting construction within the corridor during the avian breeding season. In addition, project construction within the corridor will be restricted to the daytime so that nocturnal wildlife activities are not disrupted. Temporary construction lights are not included as part of the project, therefore, wildlife nocturnal activities should remain unchanged. The project will provide appropriate traffic control and construction signage but none would interfere with the wildlife corridor because any light from signage would be directed toward the street and would not shine into the river. The existing bridge over the San Dieguito River consists of more pilings than the proposed bridge. Therefore, the function of the river as a wildlife corridor may improve once the project is complete.
- 5. Impacts to adopted plans are considered to be not significant. Project impacts and proposed mitigation do not conflict with local policies or ordinances protecting biological resources, or with the City's MCSP.
- 6. The impact of introducing a land use within an area adjacent to the MHPA that would result in adverse edge effects is considered to be not significant because a roadway currently exists in this location and the road would not be a new use.
- 7. The impact of a conflict with any local policies or ordinances protecting biological resources is considered to be not significant. The project would be consistent with these policies as discussed in Section 3.1, and Section 3.12.3.5 above.
- 8. The impact of an introduction of invasive species of plants into a natural open space area is considered to be significant but mitigable. Only native seed mixes and plant palettes would be used for erosion control, landscaping, and biological resources mitigation. Other measures to reduce and/or avoid further transport of invasive species into natural areas are discussed in Section 3.12.5.4.

			Road	Bicycle			Round-	Lower	No
Impact	Threshold	Central	Capacity	Safety	Western	Eastern	about	Elevation	Build
	Substantial adverse	SM	SM	SM	SM	SM	SM	SM	NS
Sensitive Species	impact on sensitive								
	species or their habitats								
	Substantial adverse	SM	SM	SM	SM	SM	SM	SM	NS
Tier Habitats (Tier II)	impact								
	Impact wetlands or	SM	SM	SM	SM	SM	SM	SM	NS
Wetlands and Waters of the U.S.	waters of U.S.								
Wildlife Movement	Interfere substantially	NS	NS	NS	NS	NS	NS	NS	NS
	with wildlife movement								
Habitat con-servation plans	Conflict with provisions	NS	NS	NS	NS	NS	NS	NS	NS
	Introduction of a land	NS	NS	NS	NS	NS	NS	NS	NS
MHPA edge effects	use that would result in								
	adverse edge effects								
	Conflict with provisions	NS	NS	NS	NS	NS	NS	NS	NS
Local policies or ordinances	protecting biological								
	resources								
	Introduction of invasive	SM	SM	SM	SM	SM	SM	SM	NS
Invasive species	plant species into a								
	natural open space area								

Table 3.12-7 Summary of CEQA Significance for Biological Resources Impacts

NS = Not significant SM = Significant and mitigable to below a level of significance SU = Significant and unmitigable

3.12.5 Mitigation Measures

3.12.5.1 Mitigation for Impacts to Vegetation Communities

Projects within the City of San Diego are required to avoid wetlands to the maximum extent possible (City of San Diego 2002). Where wetlands cannot be avoided, impacts must be minimized and mitigation provided to offset these impacts. The project involves the widening/replacement of a bridge that currently crosses over the San Dieguito River. Consequently, there are limitations to the measures that can be implemented to reduce and minimize impacts to wetlands. During project development, the width of the bridge was reduced to the minimum required to accomplish the purpose and need of the project. Thus, the current width of the four full roadway cross section alternatives has been reduced compared to widths reported in the draft EIR circulated in 2006.

In some cases, mitigation is proposed at ratios that are lower than the City's guidelines. Such accounting has been proposed for impacts associated with conversion of isolated and degraded wetlands located within the JPA Mitigation Site to high quality wetlands. The City's 2002 guidelines call for mitigation ratios for wetland impacts ranging from 2:1 to 4:1; however, the 2002 guidelines allow that state and federal resource agencies may override City guidelines. All state and federal regulatory agencies involved with the mitigation plan have agreed that a 1:1 mitigation ratio at the JPA Mitigation Site is acceptable. Detailed discussion of proposed mitigation, including ratios that exceed City guidelines, is presented in Chapter 4 of the NES and summarized below.

Bio-1: Wetland Habitat Mitigation Measures. Mitigation for unavoidable impacts to sensitive wetland habitats would be accomplished by: (1) creating or restoring habitat of equal value/type in the watershed or vicinity of the project and (2) enhancing degraded wetland habitats in the project watershed/vicinity through the removal of exotic plant species. The City also requires that unavoidable wetland impacts within the Coastal Overlay Zone be mitigated in the Coastal Overlay Zone (City of San Diego 2002).

Implementation of a wetland creation/restoration/enhancement plan on the JPA Mitigation Site is the principal proposed mitigation for impacts to wetland communities. The conceptual restoration plan is fully described in Appendix K of the NES (Conceptual Mitigation Plan ["restoration plan"] for the El Camino Real Bridge/Road Widening Project dated April 2015). Prior to the start of road or bridge construction, a final restoration plan is required to be prepared. The El Camino Real restoration project (i.e. the JPA Mitigation Site) would be included with the 127-acre San Dieguito Lagoon W19 Restoration Project currently being developed by the San Diego Association of Governments (SANDAG). The final restoration plan would include all elements described in the conceptual restoration plan - Appendix K. Restoration of the JPA site would include approximately 20.4 acres of wetland habitat enhancement and creation, including enhancement of a 2.0 acre parcel of existing mulefat scrub/southern willow scrub habitat located in San Dieguito River; creation of 3.0 acres of mulefat scrub/southern willow scrub habitat in an area currently consisting of disturbed Diegan Coastal Sage Scrub- Baccharis dominated, tamarisk scrub, and disturbed habitat located south of the enhancement area; and creation of approximately 15.4 acres of freshwater marsh habitat (12.5 acres of which would be protected by an earthen berm and weir. The freshwater marsh creation area currently consists primarily of disturbed Diegan Coastal Sage Scrub- Baccharis dominated, disturbed habitat, and small areas of alkali marsh and disturbed wetland. The Roundabout Alternative would require additional acreage of wetland mitigation beyond the JPA Mitigation Site. Additional suitable mitigation opportunities exist on a site owned by the City within the project vicinity; therefore, additional off-site mitigation would be achievable for the Roundabout Alternative. Specific requirements for each alternative are summarized below.

<u>Western Alignment Alternative</u>. Mitigation requirements for impacts of this alternative to vegetation communities are listed in Table 3.12-8a. Mitigation for impacts to 4.07 acres of impacts to wetland habitats would require 15.0092 acres of mitigation. In addition, 2.22 acres of mitigation would be required for implementing the proposed restoration plan, for a total requirement of 17.23 acres. Because a total acreage of 20.4 acres would be available for mitigation, the total mitigation would exceed City requirements for road and bridge improvements by 3.17 acres.

<u>Central Alignment Alternative</u>. Mitigation requirements for impacts of this alternative to vegetation communities are listed in Table 3.12-8b. Mitigation for impacts to 4.6 acres of impacts to wetland habitats would require 16.98 acres of mitigation. In addition, 2.22 acres of mitigation would be required for implementing the proposed restoration plan, for a total requirement of 19.2 acres. Because a total acreage of 20.4 acres would be available for mitigation, the total mitigation would exceed City requirements for road and bridge improvements by 1.2 acres.

<u>Eastern Alignment Alternative</u>. Mitigation requirements for impacts of this alternative to vegetation communities are listed in Table 3.12-8c. Mitigation for impacts to 4.5751 acres of impacts to wetland habitats would require 17.496 acres of mitigation. In addition, 2.22 acres of mitigation would be required for implementing the proposed restoration plan, for a total requirement of 19.716 acres. Because a total acreage of 20.4 acres would be available for mitigation, the total mitigation would exceed City requirements for road and bridge improvements by 0.684 acres.

<u>Roundabout Alternative</u>. Mitigation requirements for impacts of this alternative to vegetation communities are listed in Table 3.12-8d. Mitigation for impacts to 6.4353 acres of impacts to wetland habitats would require 24.6672 acres of mitigation. In addition, 2.22 acres of mitigation would be required for implementing the proposed restoration plan, for a total requirement of 26.8872 acres. Because a total acreage of 20.4 acres would be available for mitigation, the total acreage needed for mitigation would exceed the size of the JPA Mitigation Site by 6.48 acres. The City of San Diego owns a parcel in Gonzales Canyon immediately south of the JPA Mitigation Site and south of El Camino Real that is considered suitable for mitigation through a combination of creation and enhancement on up to 10.8 acres. This site is part of a 33-acre City-owned parcel (APN 304-020-26) and is designated as open space within the City's MHPA. The City also identified an approximately 3-acre area on City-owned parcel southeast of San Dieguito Road and Fairbanks Ranch Country Club (APN 302-262-05) suitable for enhancement. A Memorandum of Understanding is in process should it become necessary to proceed with additional mitigation for the Roundabout Alternative. Additional information about wetland creation and enhancement for the Roundabout Alternative is presented in Chapter 4 of the NES.

<u>Road Capacity and Bicycle Safety Alternatives</u>. Mitigation requirements for impacts of either of these alternatives to vegetation communities are listed in Table 3.12-8e. Mitigation for impacts to 1.98 acres of impacts to wetland habitats would require approximately 7.74 acres of mitigation. In addition, 2.22 acres of mitigation would be required for implementing the proposed restoration plan, for a total requirement of 9.964 acres. Because a total acreage of 20.4 acres would be available for mitigation, the total mitigation would exceed City requirements for road and bridge improvements by 10.44 acres.

Vegetation Community	Total Impacts (acres)	Mitigation Ratio	Mitigation Requirement (acres)	Proposed Mitigation (acres)
Wetland impacts associated with				
road and bridge improvement	0.2	0.1	0.0	
Disturbed southern willow scrub (DSWS)	0.3	3:1	0.9	MFS/SWS – Enhancement: 2.0 ac
Disturbed mulefat scrub (DMFS)	0.06	3:1	0.18	MFS/SWS – Creation: 3.0
Tamarisk scrub (TS)	0.19	2:1	0.38	ac. (Exceeds City
Disturbed wetland (DW)	0.27	2:1	0.54	requirements by 3.0 ac -1 ac
Subtotal DSWS, DMFS, TS, DW	0.82		2.00	creation and 2 ac
Coastal freshwater marsh (CFM)	0.48	4:1	1.92	enhancement)
Coastal freshwater marsh ¹ (CFM ¹)	0.0023	4:1	0.0092	
Disturbed coastal freshwater marsh (DCFM)	0.34	4:1	1.36	
Subtotal CFM, CFM ¹ , DCFM	0.8223	4:1	3.2892	3.2892 ac CFM creation
Disturbed southern coastal salt marsh	2.43	4:1	9.72	9.72 ac CFM creation
Subtotal wetland impacts associated with road and bridge improvement	4.0723		15.0092	13.0092 ac total CFM creation
Wetland impacts associated with JPA Mitigation Site				
Disturbed southern willow scrub	0.07	1:1	0.07*	Total wetland mitigation
Alkali marsh	0.48	1:1	0.48*	requirements of 17.2292 ac.
Disturbed wetland	0.23	1:1	0.23*	20.4 ac .available for
Tamarisk scrub	1.22	1:1	1.22*	mitigation. (Total mitigation
Tamarisk scrub (berm)	0.11	2:1	0.22	exceeds City requirements
Subtotal wetland impacts associated with JPA Mitigation Site	2.11		2.22	for road and bridge improvement by 3.1708 ac).
Total wetland impacts and mitigation	6.1823		17.2292	
Upland impacts associated with road and bridge improvement				
Disturbed Diegan coastal sage scrub –coastal form	0.45	1:1	0.45	Cornerstone Lands

 Table 3.12-8a

 Project Impacts and Proposed Vegetation Communities Mitigation for the Western Alignment Alternative

Vegetation Community	Total Impacts (acres)	Mitigation Ratio	Mitigation Requirement (acres)	Proposed Mitigation (acres)
Disturbed Diegan coastal sage scrub -Bacharris dominated	0.46	1:1	0.46	Cornerstone Lands
Disturbed Land	3.91	0:1	0.0	None required
Disturbed Land ²	0.0005	0:1	0.0	None required
Disturbed Land ¹	0.020	0:1	0.0	None required
Bare ground	0.08	0:1	0.0	None required
Ornamental	0.7	0:1	0.0	None required
Subtotal upland impacts associated with road and bridge improvement	5.6205		0.91	Mitigation for impacts to 0.91 acre of disturbed Diegan coastal sage scrub accomplished through purchase of credits from Cornerstone Lands
Upland impacts associated with JPA Mitigation Site Disturbed Diegan coastal sage scrub –coastal form (berm)	0.03	1:1	0.03	Cornerstone Lands.
Disturbed Diegan coastal sage scrub – Baccharis dominated (berm)	1.13	1:1	1.13	Cornerstone Lands
Disturbed Diegan coastal sage scrub – Baccharis dominated	13.17	1:1	13.17	Cornerstone Lands
Disturbed Land	3.41	0:0	0.0	None required
Non-native grassland	0.04		0.04	Cornerstone Lands
Subtotal upland impacts associated with JPA Mitigation Site	17.81		14.37	Mitigation for impacts to 14.33 acres of disturbed Diegan coastal sage scrub and 0.04 acre of non-native grassland accomplished through purchase of credits from Cornerstone Lands

Table 3.12-8a Project Impacts and Proposed Vegetation Communities Mitigation for the Western Alignment Alternative

¹Within Fairbanks Mitigation Site, Northern ²Within Fairbanks Mitigation Site, Southern

* Impacts to wetland habitats within the JPA Mitigation Site will be mitigated by creation of higher quality wetland habitats in the restored JPA Mitigation Site at a 1:1 ratio.

Vegetation Community	Total Impacts (acres)	Mitigation Ratio	Mitigation Requirement (acres)	Proposed Mitigation (acres)
Wetland impacts associated with road and bridge improvement				
Disturbed southern willow scrub	0.06	3:1	0.18	MFS/SWS –
(DSWS)	0.00	011	0.10	Enhancement: 2.0 ac
Mulefat scrub (MFS)	0.0379	3:1	0.114	MFS/SWS – Creation: 3.0
Mulefat scrub ¹ (MFS)	0.012	3:1	0.035	ac (Exceeds City
Disturbed mulefat scrub (DMFS)	0.10	3:1	0.30	requirements by 3.18 ac –
Disturbed wetland (DW)	0.60	2:1	1.2	1.18 ac creation and 2.0 ac
Subtotal DSWS, DMFS, TS, DW	0.8099		1.82	enhancement)
Coastal freshwater marsh (CFM)	0.686	4:1	2.744	
Coastal freshwater marsh ² (CFM ²)	0.004	4:1	0.016	1
Disturbed coastal freshwater marsh (DCFM)	0.35	4:1	1.40	
Subtotal CFM, CFM ² , DCFM	1.04	4:1	4.16	
Disturbed southern coastal salt marsh	2.75	4:1	11.00	4.16 ac CFM creation
Subtotal wetland impacts associated with road and bridge improvement	4.5999		16.98	11.00 ac CFM creation 15.16 ac total CFM creation
Wetland impacts associated with JPA Mitigation Site				Total wetland mitigation requirement 19.2 ac. 20.4
Disturbed southern willow scrub	0.07	1:1	0.07*	ac available for mitigation.
Alkali marsh	0.48	1:1	0.48*	(Total mitigation exceeds
Disturbed wetland	0.23	1:1	0.23*	City requirements for road
Tamarisk scrub	1.22	1:1	1.22*	and bridge improvement by 1.2 acre)
Tamarisk scrub (berm)	0.11	2:1	0.22	1.2 acre)
Subtotal wetland impacts associated with JPA Mitigation Site	2.11		2.22	
Total wetland impacts and mitigation	6.71		19.2	
Upland impacts associated with road and bridge improvement				
Disturbed Diegan coastal sage scrub –coastal form	0.515	1:1	0.515	Cornerstone Lands
Disturbed Diegan coastal sage scrub –coastal form ¹	0.038	1:1	0.038	Cornerstone Lands

Table 3.12-8b
Project Impacts and Proposed Vegetation Communities Mitigation for the
Central Alignment Alternative

Total Impacts (acres)	Mitigation Ratio	Mitigation Requirement (acres)	Proposed Mitigation (acres)
0.21	1:1	0.46	Cornerstone Lands
4.143	0:1	0.0	None required
0.0031	0:1	0.0	None required
0.069	0:1	0.0	None required
0.179	0:1	0.0	None required
0.081	0:1	0.0	None required
0.86	0:1	0.0	None required
0.23	0:1	0.0	None required
7.37	0:1	0.0	None required
0.017	0:1	0.0	None required
0.0001	0:1	0.0	None required
5.6205		0.763	Mitigation for impacts to 0.763 acre of disturbed Diegan coastal sage scrub accomplished through purchase of credits from Cornerstone Lands.
0.03	1:1	0.03	Cornerstone Lands
1.13	1:1	1.13	Cornerstone Lands
13.17	1:1	13.17	Cornerstone Lands
3.41	0:0	0.0	None required
0.04	1:1	0.04	Cornerstone Lands
17.81		14.37	Mitigation for impacts to 14.33 acres of disturbed Diegan coastal sage scrub and 0.04 acre of non-native grassland accomplished through purchase of credits
	Impacts (acres) 0.21 4.143 0.0031 0.069 0.179 0.081 0.86 0.23 7.37 0.017 0.0001 5.6205 0.03 1.13 13.17 3.41 0.04	Impacts (acres) Mitigation Ratio 0.21 1:1 4.143 0:1 0.0031 0:1 0.069 0:1 0.179 0:1 0.081 0:1 0.23 0:1 0.79 0:1 0.086 0:1 0.23 0:1 7.37 0:1 0.017 0:1 0.001 0:1 5.6205	Impacts (acres) Mitigation Ratio Requirement (acres) 0.21 1:1 0.46 4.143 $0:1$ 0.0 0.0031 $0:1$ 0.0 0.069 $0:1$ 0.0 0.069 $0:1$ 0.0 0.081 $0:1$ 0.0 0.86 $0:1$ 0.0 0.23 $0:1$ 0.0 0.737 $0:1$ 0.0 0.0017 $0:1$ 0.0 0.001 $0:1$ 0.0 0.003 $1:1$ 0.03 1.13 $1:1$ 0.03 1.13 $1:1$ 1.13 13.17 $1:1$ 0.04

Table 3.12-8b
Project Impacts and Proposed Vegetation Communities Mitigation for the
Central Alignment Alternative

¹Fairbanks Mitigation Site, Northern

²Fairbanks Mitigation Site, Southern

* Impacts to wetland habitats within the JPA Mitigation Site will be mitigated by creation of higher quality wetland habitats in the restored JPA Mitigation Site at a 1:1 ratio.

Vegetation Community	Total Impacts (acres)	Mitigation Ratio	Mitigation Requirement (acres)	Proposed Mitigation (acres)
Wetland impacts associated with road and bridge improvement				
Disturbed southern willow scrub (DSWS)	0.12	3:1	0.36	MFS/SWS – Enhancement: 2.0 ac
Mulefat scrub (MFS)	0.222	3:1	0.666	MFS/SWS – Creation: 3.0
Mulefat scrub ¹ (MFS)	0.068	3:1	0.204	ac (Exceeds City
Disturbed mulefat scrub (DMFS)	0.25	3:1	0.75	requirements by 2.88 ac –
Disturbed wetland (DW)	0.07	2:1	0.14	0.88 ac creation and 2.0 ac
Tamarisk scrub	0.003	2:1	0.006	enhancement)
Subtotal DSWS, MFS, MFS ¹ , DMFS, DW	0.73		2.126	
Coastal freshwater marsh (CFM)	1.1881	4:1	4.7524	
Coastal freshwater marsh ² (CFM ³)	0.004	4:1	0.016	
Disturbed coastal freshwater marsh (DCFM)	0.384	4:1	1.52	
Subtotal CFM, CFM ² , DCFM	1.5761	4:1	6.2884	
Disturbed southern coastal salt marsh	2.27	4:1	9.08	6.2884 ac CFM creation
Subtotal wetland impacts associated with road and bridge improvement	4.5761		17.4944	9.08 ac CFM creation 15.3684 ac total CFM creation
Wetland impacts associated with JPA Mitigation Site				Total mitigation requirement 19.7144 ac.
Disturbed southern willow scrub	0.07	1:1	0.07*	20.4 ac available for
Alkali marsh	0.48	1:1	0.48*	mitigation (Total mitigation
Disturbed wetland	0.23	1:1	0.23*	exceeds City requirements
Tamarisk scrub	1.22	1:1	1.22*	for road and bridge
Tamarisk scrub (berm)	0.11	2:1	0.22)	improvement by 0.6858 ac)
Subtotal wetland impacts associated with JPA Mitigation Site	2.11	1:1	2.22	
Total wetland impacts and mitigation	6.6891		19.7144	
Upland impacts associated with road and bridge improvement				
Disturbed Diegan coastal sage scrub –coastal form	0.403	1:1	0.403	Cornerstone Lands
Disturbed Diegan coastal sage scrub –coastal form ²	0.037	1:1	0.037	Cornerstone Lands
Disturbed Diegan coastal sage	0.0002	1:1	0.0002	Cornerstone Lands

 Table 3.12-8c

 Project Impacts and Proposed Vegetation Communities Mitigation for the Eastern Alignment Alternative

2.84 0.0031 0.097 0.27 0.01502 0.49 0.37 8.33 0.11 0.0001	0:1 0:1 0:1 0:1 0:1 0:1 0:1 0:1 0:1	0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0	None required None required
0.0031 0.097 0.27 0.01502 0.49 0.37 8.33 0.11 0.0001	0:1 0:1 0:1 0:1 0:1 0:1 0:1 0:1	0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0	None required
0.097 0.27 0.01502 0.49 0.37 8.33 0.11 0.0001	0:1 0:1 0:1 0:1 0:1 0:1 0:1	0.0 0.0 0.0 0.0 0.0 0.0 0.0 0.0	None required
0.27 0.01502 0.49 0.37 8.33 0.11 0.0001	0:1 0:1 0:1 0:1 0:1 0:1	0.0 0.0 0.0 0.0 0.0 0.0 0.0	None required
0.01502 0.49 0.37 8.33 0.11 0.0001	0:1 0:1 0:1 0:1 0:1	0.0 0.0 0.0 0.0 0.0	None required None required None required None required None required None required
0.49 0.37 8.33 0.11 0.0001	0:1 0:1 0:1 0:1	0.0 0.0 0.0 0.0	None required None required None required None required
0.37 8.33 0.11 0.0001	0:1 0:1 0:1	0.0 0.0 0.0	None required None required None required
8.33 0.11 0.0001	0:1 0:1	0.0 0.0	None required None required
0.11 0.0001	0:1	0.0	None required None required
0.0001			None required
	0:1	0.0	
17 67			Trone required
11.01		0.4402	Mitigation for impacts to 0.4402 acre of disturbed Diegan coastal sage scrub accomplished through purchase of credits from Cornerstone Lands.
0.03	1:1	0.03	Cornerstone Lands
1.13	1:1	1.13	Cornerstone Lands
13.17	1:1	13.17	Cornerstone Lands
3.41	0:0	0.0	None required
0.04		0.04	Cornerstone Lands
17.81		14.37	Mitigation for impacts to 14.33 acres of disturbed Diegan coastal sage scrub and 0.04 acre of non-native grassland accomplished through purchase of credits
	13.17 3.41 0.04	1.13 1:1 13.17 1:1 3.41 0:0 0.04 0.04	1.13 1:1 1.13 13.17 1:1 13.17 3.41 0:0 0.0 0.04 0.04

Table 3.12-8c Project Impacts and Proposed Vegetation Communities Mitigation for the **Eastern Alignment Alternative**

¹Fairbanks Mitigation Site, northern ²Fairbanks Mitigation Site, southern * Impacts to wetland habitats within the JPA Mitigation Site will be mitigated by creation of higher quality wetland habitats in the restored JPA Mitigation Site at a 1:1 ratio.

Vegetation Community	Total Impacts (acres)	Mitigation Ratio	Mitigation Requirement (acres)	Proposed Mitigation (acres) ¹
Wetland impacts associated with road and bridge improvement				
Disturbed southern willow scrub (DSWS)	0.31	3:1	0.93	MFS/SWS – Enhancement: 2.0 ac
Mulefat scrub (MFS)	0.22	3:1	0.66	MFS/SWS – Creation: 3.0
Mulefat scrub ² (MFS^2)	0.068	3:1	0.204	ac. (Exceeds City
Disturbed mulefat-scrub (DMFS)	0.25	3:1	0.75	requirements by 2.236 ac -
Disturbed wetland (DW)	0.11	2:1	0.22	0.236 ac creation and 2 ac
Tamarisk scrub	0.003	2:1	0.006	enhancement)
Subtotal DSWS, MFS, MFS ² , DMFS, TS, DW	0.961		2.77	-
Coastal freshwater marsh (CFM)	1.27	4:1	5.08	7
Coastal freshwater marsh ³ (CFM ³)	0.0041	4:1	0.0164	7
Disturbed coastal freshwater marsh (DCFM)	0.38	4:1	1.52	
Alkali marsh (AM)	0.0302	4:1	0.1208	
Subtotal CFM, CFM ³ , DCFM, AM	1.6843	4:1	6.7372	6.7372 ac CFM creation
Disturbed southern coastal salt marsh	3.79	4:1	15.16	15.16 ac CFM creation 21.8972 total CFM creation
Subtotal wetland impacts associated with road and bridge improvement	6.4353		24.6672	
Wetland impacts associated with JPA Mitigation Site				
Disturbed southern willow scrub	0.07	1:1	0.07*	26.8872 ac of mitigation
Alkali marsh	0.48	1:1	0.48*	exceeds the size of the JPA
Disturbed wetland	0.23	1:1	0.23*	Mitigation Site by 6.48 ac;
Tamarisk scrub	1.22	1:1	1.22*	Additional mitigation
Tamarisk scrub (berm)	0.11	2:1	0.22	achieved through a
Subtotal wetland impacts associated with JPA Mitigation Site	2.11		2.22	combination of wetland creation and enhancement o 10.8 ac of City-owned land in the San Dieguito River
Total wetland impacts and	8.5453		26.8872	Valley.
mitigation				
Upland impacts associated with road and bridge improvement				
Disturbed Diegan coastal sage scrub –coastal form	0.69	1:1	0.69	Cornerstone Lands
Disturbed Diegan coastal sage scrub –coastal form ²	0.037	1:1	0.037	

 Table 3.12-8d

 Project Impacts and Proposed Vegetation Communities Mitigation for the Roundabout Alternative

Vegetation Community	Total Impacts (acres)	Mitigation Ratio	Mitigation Requirement (acres)	Proposed Mitigation (acres) ¹
Disturbed Diegan coastal sage	0.06	1:1	0.06	Cornerstone Lands
scrub -Baccharis dominated				
Disturbed Land	3.98	0:1	0.0	None required
Disturbed Land ²	0.0031	0:1	0.0	None required
Disturbed Land ³	0.096	0:1	0.0	None required
Eucalyptus woodland	0.27	0:1	0.0	None required
Eucalyptus woodland ²	0.1502	0:1	0.0	None required
Bare ground	0.18	0:1	0.0	None required
Ornamental	0.56	0:1	0.0	None required
Urban/Developed	12.18	0:1	0.0	None required
Urban/Developed ²	0.11	0:1	0.0	None required
Urban/Developed ^{30.11}	0.001	0:1	0.0	None required
Subtotal upland impacts associated with road and bridge improvement	17.6973		0.787	Mitigation for impacts to 0.787 acre of disturbed Diegan coastal sage scrub accomplished through purchase of credits from Cornerstone Lands
Upland impacts associated with JPA Mitigation Site				
Disturbed Diegan coastal sage scrub –coastal form (berm)	0.03	1:1	0.03	Cornerstone Lands.
Disturbed Diegan coastal sage scrub – Baccharis dominated (berm)	1.13	1:1	1.13	Cornerstone Lands
Disturbed Diegan coastal sage scrub – Baccharis dominated	13.17	1:1	13.17	Cornerstone Lands
Disturbed Land	3.41	0:0	0.0	None required
Non-native grassland	0.04		0.04	Cornerstone Lands
Subtotal upland impacts associated with JPA Mitigation Site	17.81		14.37	Mitigation for impacts to 14.33 acres of disturbed Diegan coastal sage scrub and 0.04 acre of non-native grassland accomplished through purchase of credits

Table 3.12-8d Project Impacts and Proposed Vegetation Communities Mitigation for the **Roundabout Alternative**

¹Additional mitigation opportunities for marsh habitat are available on a site owned by the City.

²Fairbanks Ranch Site, northern ³Fairbanks Ranch Site, southern

* Impacts to wetland habitats within the JPA Mitigation Site will be mitigated by creation of higher quality wetland habitats in the restored JPA Mitigation Site at a 1:1 ratio.

Vegetation Community	Total Impacts (acres)	Mitigation Ratio	Mitigation Requirement (acres)	Proposed Mitigation (acres)
Wetland impacts associated with road and bridge improvement				
Disturbed southern willow scrub (DSWS)	0.0884	3:1	0.27	MFS/SWS – Enhancement: 2.0 ac
Disturbed mulefat scrub (DMFS)	0.0219	3:1	0.066	MFS/SWS – Creation:
Tamarisk scrub (TS)	0.0338	2:1	0.068	3.0 ac . (Exceeds City
Disturbed wetland (DW)	0.0018	2:1	0.0036	requirements by 4.59 ac -
Subtotal DSWS, DMFS, TS, DW	0.146		0.41	2.59 ac creation and 2 ac
Coastal freshwater marsh (CFM)	0.4539	4:1	1.816	enhancement)
Coastal freshwater marsh ¹ (CFM ¹)	0.0027	4:1	0.0108	
Disturbed coastal freshwater marsh (DCFM)	0.3308	4:1	1.323	
Subtotal CFM, CFM ¹ , DCFM	0.787	4:1	3.15	3.15 ac CFM creation
Disturbed southern coastal salt marsh	1.046	4:1	4.184	4.184 ac CFM creation
Subtotal wetland impacts associated with road and bridge improvement	1.98		7.74	7.74 ac total CFM creation
Wetland impacts associated with JPA Mitigation Site				
Disturbed southern willow scrub	0.07	1:1	0.07*	Total wetland mitigation
Alkali marsh	0.48	1:1	0.48*	requirements of 9.964 ac.
Disturbed wetland	0.23	1:1	0.23*	20.4 ac .available for
Tamarisk scrub	1.22	1:1	1.22*	mitigation. (Total
Tamarisk scrub (berm)	0.11	2:1	0.22	mitigation exceeds City
Subtotal wetland impacts associated with JPA Mitigation Site	2.11		2.22	requirements for road and bridge improvement by 10.44 ac).
Total wetland impacts and mitigation	4.09		9.96	10.44 ac).
Total wetland impacts and imtigation	4.09		9.90	
Upland impacts associated with road and bridge improvement				
Disturbed Diegan coastal sage scrub – coastal form	0.4065	1:1	0.4065	Cornerstone Lands
Disturbed Diegan coastal sage scrub - Baccharis dominated	0.0384	1:1	0.0384	Cornerstone Lands
Subtotal upland impacts associated with road and bridge improvement	0.45		0.45	Mitigation for impacts to 0.445 acre of disturbed Diegan coastal sage scrub accomplished through Cornerstone Lands

 Table 3.12-8e

 Project Impacts and Proposed Vegetation Communities Mitigation for the Road Capacity and Bicycle Safety Alternatives

Vegetation Community	Total Impacts (acres)	Mitigation Ratio	Mitigation Requirement (acres)	Proposed Mitigation (acres)
Disturbed Land/ Bare Ground/	8.64	0:1	0.0	None required
Ornamental/Developed				
Upland impacts associated with JPA Mitigation Site				
Disturbed Diegan coastal sage scrub – coastal form (berm)	0.03	1:1	0.03	Cornerstone Lands.
Disturbed Diegan coastal sage scrub – Baccharis dominated (berm)	1.13	1:1	1.13	Cornerstone Lands
Disturbed Diegan coastal sage scrub – Baccharis dominated	13.17	1:1	13.17	Cornerstone Lands
Disturbed Land	3.41	0:0	0.0	None required
Non-native grassland	0.04		0.04	Cornerstone Lands
Subtotal upland impacts associated with JPA Mitigation Site	17.81		14.37	Mitigation for impacts to 14.33 acres of disturbed Diegan coastal sage scrub and 0.04 acre of non- native grassland accomplished through purchase of credits from Cornerstone Lands

 Table 3.12-8e

 Project Impacts and Proposed Vegetation Communities Mitigation for the Road Capacity and Bicycle Safety Alternatives

¹Within Fairbanks Mitigation Site, Northern

²Within Fairbanks Mitigation Site, Southern

* Impacts to wetland habitats within the JPA Mitigation Site will be mitigated by creation of higher quality wetland habitats in the restored JPA Mitigation Site at a 1:1 ratio.

Source: ICF/Nordby 2015

Bio-2: Upland Habitat Mitigation Measures. Impacts to sensitive upland habitats, including acreage of disturbed Diegan coastal sage scrub associated with road and bridge improvement and 14.33 acres disturbed Diegan coastal sage scrub habitats associated with the JPA Mitigation Site (conversion of uplands to wetlands), would be mitigated through purchase of credits from the City's Cornerstone Land Mitigation Bank (Marron Valley) using appropriate City tier and ratio. Implementation of this measure will require concurrence from the Wildlife Agencies per conditions of the Cornerstone Banking Agreement.

Bio-3: Additional Vegetation Communities Mitigation Measures. The project footprint would be demarcated prior to construction in order to avoid encroachment into surrounding sensitive areas. Furthermore, a qualified biologist would monitor construction activities for the duration of the project to ensure that practicable measures are being employed to avoid incidental disturbance of habitat outside of the project footprint.

3.12.5.2 Mitigation for Impacts to Sensitive Plant Species

Bio-4: General Measures. Prior to removal of vegetation, orange snow fencing would be installed to demarcate the project footprint in order to avoid encroachment into surrounding

sensitive areas. Furthermore, a qualified biologist would monitor construction activities for the duration of the project to ensure that practicable measures are being employed to avoid incidental disturbance of special-status species outside of the project footprint. Measures for specific sensitive plant species are summarized below.

Bio-5: Palmer's Sagewort. Palmer's sagewort would be included in the plant palette used in the creation and enhancement of southern willow scrub/mulefat scrub in the JPA Mitigation Site. Final success criteria for the JPA Mitigation Site will require the presence of Palmer's sagewort prior to final site signoff.

Bio-6: San Diego Sunflower. Habitat-based mitigation would be provided for impacts to disturbed Diegan coastal sage scrub, the vegetation community on site in which the San Diego sunflower is found, at a 1:1 ratio.

Bio-7: San Diego Marsh-elder. Within the JPA Mitigation Site, San Diego marsh-elder occurring within areas to be enhanced would be flagged or fenced to ensure that these individuals are not removed by work crews and are instead incorporated into the enhancement areas. San Diego marsh-elder would be included in the plant palette used in the creation and enhancement of southern willow scrub/mulefat scrub in the JPA Mitigation Site. Final success criteria for the JPA Mitigation Site will require the presence of San Diego marsh-elder prior to final site signoff.

Bio-8. Southwestern Spiny Rush. Within the JPA Mitigation Site, southwestern spiny rush occurring within areas to be enhanced would be flagged or fenced to ensure that these individuals are not removed by work crews and are instead incorporated into the enhancement areas. Southwestern spiny rush would be included in the plant palette used in the creation of coastal freshwater marsh in the JPA Mitigation Site. Final success criteria for the JPA Mitigation Site will require the presence of southwestern spiny rush prior to final site signoff. Furthermore, habitat-based mitigation would be offered for impacts to coastal freshwater marsh and mulefat scrub supporting southwestern spiny rush.

3.12.5.3 Mitigation for Impacts to Sensitive Wildlife Species

Bio-9: General Mitigation Measures. Habitat-based mitigation would occur at mitigation ratios established by the City in the Biology Guidelines (City of San Diego 2002), including 4:1 for Clark's marsh wren habitat, 3:1 for yellow-breasted chat habitat, 4:1 for light-footed clapper rail habitat, and 3:1 for least Bell's vireo habitat.

On the JPA Mitigation Site, habitat-based mitigation for species that occupy upland habitats, such as white-tailed kite, would be accomplished at a 2:1 ratio through purchase of credits from Cornerstone Lands. Habitat-based mitigation for species that occupy disturbed, isolated wetland habitats on the JPA Mitigation Site would be provided through conversion to higher quality wetlands at a 1:1 ratio.

In order to avoid direct impacts to nesting birds, removal of vegetation for all areas, including bridge/road construction and earthwork required for the JPA mitigation site preparation, would occur outside of the breeding season for birds (typically defined as February 1- September 15). Typically, if a preconstruction nesting bird survey determines that nesting birds do not occur in the vicinity of the site (typically 300 feet for passerine birds and 500 feet for raptors), removal of vegetation can occur within the breeding season for avian species. However, for this project, the presence of least Bell's vireo precludes the removal of vegetation around a 300-foot buffer from the edge of occupied habitat from February 1 through September 30. All areas of disturbed

southern willow scrub occurring along the San Dieguito River are considered occupied by least Bell's vireo.

If vegetation removal is to occur from January to February 1, a preconstruction nesting bird survey for raptors and other early nesting species would be conducted. If a nest is found, methods consistent with the City's Biology Guidelines, the City's MSCP Subarea Plan and state and federal protocol would be implemented to avoid impacts. This would consist of a no-work buffer zone placed around the nest until the adults are no longer using it or the young have fledged. The specific buffer width would be determined by a qualified biologist at the time of discovery consistent with the City's Biology Guidelines, the City's MSCP Subarea Plan and state and federal protocol. According to the City of San Diego Biology Guidelines (City of San Diego 2002), for areas within the MHPA, a 900-foot buffer would be placed around any nesting site of a northern harrier.

Bio-10: Least Bell's Vireo Mitigation Measures. Habitat-based mitigation would be provided to compensate for impacts to occupied least Bell's vireo habitat. In the project area, potential least Bell's vireo habitat consists of disturbed southern willow scrub occurring in association with the San Dieguito River. To offset anticipated project impacts to this habitat, disturbed southern willow scrub would be created and enhanced at a ratio greater than 3:1. Mitigation for impacts to tamarisk scrub would also be provided because tamarisk scrub is situated adjacent to disturbed southern willow scrub and may be utilized as foraging habitat by least Bell's vireo. Mitigation would be accomplished through implementation of the conceptual restoration plan within the JPA Mitigation Site, which is in the San Dieguito River watershed.

Bio-11: Clapper Rail Mitigation Measures. Habitat-based mitigation would be provided for the loss of suitable/occupied light-footed clapper rail habitat. In the project area, potential light-footed clapper rail habitat consists of coastal freshwater marsh and riparian habitats within the San Dieguito River. To offset anticipated project impacts to this habitat, coastal freshwater marsh would be created or enhanced at the JPA Mitigation Site at a 4:1 ratio. If the Roundabout Alternative is selected, the additional mitigation required would be achieved on an available site immediately south of the JPA site and south of El Camino Real. Thus, the goal of "no net loss" of wetland habitat from the project would be achieved. Mitigation 4:1 ratios are based on the sensitivity of the light-footed clapper rail, as recommended by CDFW and USFWS in multi-agency coordination meetings held in 2005.

In order to further avoid and minimize impacts to light-footed clapper rail the following general and specific measures would be implemented:

I. General Clapper Rail Measures

- A. Staging and equipment storage areas, and equipment maintenance will be located outside of the river corridor and all potential habitat areas.
- B. A qualified biologist will train construction crews (including utility personnel) to avoid unnecessary impacts to the biological resources by briefing them on resource protection measures. The project biologist and crew must be familiar with the identification and life history/habits of light-footed clapper rail.
- C. Prior to the start of construction, a qualified project biologist will supervise installation of orange construction fencing or equivalent along the limits of disturbance within and surrounding sensitive habitats as shown on the approved construction plans. Temporary fencing will be removed after project completion.

- D. The project biologist will monitor all phases of construction to minimize impacts on sensitive species, check that wildlife is not entrapped, verify that the boundary fencing is maintained in good condition, and ensure that construction activities do not encroach into biologically sensitive areas beyond the approved limits of construction.
- E. A wildlife corridor will be maintained during all construction within the river corridor during non-breeding season. Should the berm option be exercised, the wildlife corridor will consist of a low flow channel of the river, approximately 40 feet wide. Orange construction fencing will be installed along the banks of the low flow channel to discourage wildlife from accessing the construction areas approved in the plans. The trestle option would provide for a wildlife corridor that maintains the current geometry of the river corridor with the exception of the rows of driven piles that would function similarly to the existing bridge support columns (with approximately twice as many series of piles compared to the pier walls), i.e., would result in a series of passageways across the river.
- F. Construction lighting in upland areas will be the lowest illumination necessary, and directed away, or shielded from the river corridor.
- G. The project site will be kept as clean of debris as possible to avoid attracting predators of sensitive wildlife. All food-related trash items will be enclosed in sealed containers and regularly removed from the site.
- H. Pets of project personnel will not be allowed on the project site.
- I. Disposal or temporary placement of excess fill, brush, or other debris will not be allowed in Waters of the U.S. or within their banks.

II. Specific Clapper Rail Measures

- A. No construction will occur within the river corridor during the clapper rail breeding season (February 1 September 30).
- B. Noise from construction activities outside of the river corridor will not exceed 60 dBA (one-hour) at the river corridor (or ambient, whichever is greater) during the light-footed clapper rail breeding season. If the noise limit is exceeded, the noise will be reduced by using temporary noise measures such as plywood barriers, equipment mufflers, or sound blankets.
- C. Outside of the breeding season, construction in the river corridor will be limited to daylight hours. No temporary lighting will be installed for construction at night.
- D. Once the clapper rail breeding season has ended (i.e. on October 1), all vegetation within the approved limits of disturbance will be removed prior to the beginning of construction to eliminate the potential for rails to seek vegetative cover within the work area. The project biologist will monitor vegetation removal activities to avoid impacts to rails during this process. Should any rails be detected in the limits of disturbance, vegetation removal activities will be halted temporarily while by the project biologistsflushes the rail(s) from the area to be cleared into existing emergent vegetation west and east of the bridge. As part of daily monitoring, the project biologist shall evaluate the response of the fully protected species that come near the

project site and implement the appropriate response actions. Biological monitors will notify the construction manager of any activities that may harm or harass a fully protected species and recommend suspending those activities so that the key personnel may be notified and apprised of the situation and the potential conflict can be resolved.

- E. A wildlife corridor will be maintained during all construction within the river corridor during non-breeding season to allow east/west movement by rails. For the berm option, the wildlife corridor would consist of a low flow channel of the river, approximately 40 feet wide. Orange construction fencing will be installed parallel to the low flow channel to discourage clapper rails from accessing the construction areas approved in the plans. The trestle option would provide a series of openings across the width of the river.
- F. These measures have been developed in an effort to prevent clapper rails from being injured or killed by construction activities within the fenced construction footprint by removing vegetation that might provide cover; fencing to discourage access by the clapper rail; and monitoring to determine the effectiveness of these measures. Should earthen berms be employed for access across the San Dieguito River, a minimum of one 40-foot-wide corridor opening will be provide via installation of a construction bridge to allow river flow and rails and other species to move east and west along the river corridor. Should the trestle option be employed, wildlife movement can occur between parallel rows of driven piles.
- G. The river corridor is defined as all water and wetland vegetation occurring between the banks of the river, similar to area delineated as being CDFW jurisdictional. Where those banks are steep and/or armored, such as the area immediately upstream of the existing bridge, this definition is more obvious. Where the banks are less steep and vegetation exists on the banks, this definition may be less obvious; however, once upland habitats or developed areas occur, these are considered outside of the corridor. Thus, the polo fields and golf course to the east of the bridge are not considered within the river corridor, nor are the Horse Park or fallow agricultural fields to the west of the bridge.
- H. Wetland regulations that require no-net-loss of wetlands would provide additional protection for this species. The proposed project conforms to the conditions of coverage established by the MSCP for this species because proposed mitigation would result in no-net-loss of wetlands. This species is covered by the MSCP because 93 percent of its potential habitat would be preserved under this plan. Although covered by the MSCP, the federal MSCP permit does not authorize harm or lethal take for the species. Also, light-footed clapper rail is a fully protected species; therefore, "take" of this species cannot be authorized by the state.

3.12.5.4 Mitigation for Invasive Species

Bio-12: Invasive Species Mitigation Measures. To ensure the project does not promote the introduction of invasive species to the surrounding undeveloped areas, construction equipment would be cleaned of mud or other debris that may contain invasive plants and/or seeds and would be inspected to reduce the potential of spreading noxious weeds before mobilizing to the site and before leaving the site, during the course of construction. Also, trucks with loads carrying vegetation would be covered, and vegetation materials removed from the site would be disposed

of in accordance with applicable laws and regulations. In addition, invasive species will be monitored during the protracted construction period and removed or treated in an environmentally sound manner.

3.12.5.5 Additional Mitigation Measures

Bio-13: Mitigation, Monitoring and Reporting Conditions for Least Bell's Vireo. The following Mitigation, Monitoring and Reporting conditions are required by the City for potential impacts to habitats occupied by sensitive avian species. The measures for State Endangered/Federally Endangered least Bell's vireo, which is the only species applicable to the project, are provided below.

Prior to the preconstruction meeting, the City Manager (or appointed designee) shall verify that the following project requirements regarding the least Bell's vireo are shown on the construction plans:

I. NO CLEARING, GRUBBING, GRADING, OR OTHER CONSTRUCTION ACTIVITIES SHALL OCCUR BETWEEN MARCH 15 AND SEPTEMBER 15, THE BREEDING SEASON OF THE LEAST BELL'S VIREO, UNTIL THE FOLLOWING REQUIREMENTS HAVE BEEN MET TO THE SATISFACTION OF THE CITY MANAGER:

- A. A QUALIFIED BIOLOGIST (POSSESSING A VALID ENDANGERED SPECIES ACT SECTION 10(a)(1)(A) RECOVERY PERMIT) SHALL SURVEY THOSE WETLAND AREAS THAT WOULD BE SUBJECT TO CONSTRUCTION NOISE LEVELS EXCEEDING 60 DECIBELS [dB(A)] HOURLY AVERAGE FOR THE PRESENCE OF THE LEAST BELL'S VIREO. SURVEYS FOR THE THIS SPECIES SHALL BE CONDUCTED PURSUANT TO THE PROTOCOL SURVEY GUIDELINES ESTABLISHED BY THE U.S. FISH AND WILDLIFE SERVICE WITHIN THE BREEDING SEASON PRIOR TO THE COMMENCEMENT OF CONSTRUCTION. IF THE LEAST BELL'S VIREO IS PRESENT, THEN THE FOLLOWING CONDITIONS MUST BE MET:
 - 1. BETWEEN MARCH 15 AND SEPTEMBER 15, NO CLEARING, GRUBBING, OR GRADING OF OCCUPIED LEAST BELL'S VIREO HABITAT SHALL BE PERMITTED. AREAS RESTRICTED FROM SUCH ACTIVITIES SHALL BE STAKED OR FENCED UNDER THE SUPERVISION OF A QUALIFIED BIOLOGIST; <u>AND</u>
 - 2. BETWEEN MARCH 15 AND SEPTEMBER 15, NO CONSTRUCTION ACTIVITIES SHALL OCCUR WITHIN ANY PORTION OF THE SITE WHERE CONSTRUCTION ACTIVITIES WOULD RESULT IN NOISE LEVELS EXCEEDING 60 dB(A) HOURLY AVERAGE AT THE EDGE OF OCCUPIED LEAST BELL'S VIREO OR AN ANALYSIS SHOWING THAT NOISE GENERATED BY HABITAT. CONSTRUCTION ACTIVITIES WOULD NOT EXCEED 60 dB (A) HOURLY AVERAGE AT THE EDGE OF OCCUPIED HABITAT MUST BE COMPLETED BY A QUALIFIED ACOUSTICIAN (POSSESSING CURRENT NOISE ENGINEER LICENSE OR REGISTRATION WITH MONITORING NOISE LEVEL EXPERIENCE WITH LISTED ANIMAL SPECIES) AND APPROVED BY THE CITY MANAGER AT LEAST TWO WEEKS PRIOR TO THE COMMENCEMENT OF CONSTRUCTION ACTIVITIES. PRIOR TO THE COMMENCEMENT OF ANY OF CONSTRUCTION ACTIVITIES DURING THE BREEDING SEASON, AREAS

RESTRICTED FROM SUCH ACTIVITIES SHALL BE STAKED OR FENCED UNDER THE SUPERVISION OF A QUALIFIED BIOLOGIST; <u>OR</u>

3. AT LEAST TWO WEEKS PRIOR TO THE COMMENCEMENT OF CONSTRUCTION ACTIVITIES. UNDER THE DIRECTION OF A OUALIFIED ACOUSTICIAN, NOISE ATTENUATION MEASURES (e.g., BERMS, WALLS) SHALL BE IMPLEMENTED TO ENSURE THAT NOISE LEVELS RESULTING FROM CONSTRUCTION ACTIVITIES WILL NOT EXCEED 60 dB(A) HOURLY AVERAGE AT THE EDGE OF HABITAT OCCUPIED BY THE LEAST BELL'S VIREO. CONCURRENT WITH THE COMMENCEMENT OF CONSTRUCTION CONSTRUCTION OF NECESSARY **ACTIVITIES** AND THE NOISE ATTENUATION FACILITIES, NOISE MONITORING* SHALL BE CONDUCTED AT THE EDGE OF THE OCCUPIED HABITAT AREA TO ENSURE THAT NOISE LEVELS DO NOT EXCEED 60 dB (A) HOURLY AVERAGE. IF THE NOISE ATTENUATION TECHNIQUES IMPLEMENTED ARE DETERMINED TO BE INADEQUATE BY THE QUALIFIED ACOUSTICIAN OR BIOLOGIST, THEN THE ASSOCIATED CONSTRUCTION ACTIVITIES SHALL CEASE UNTIL SUCH TIME THAT ADEQUATE NOISE ATTENUATION IS ACHIEVED OR UNTIL THE END OF THE BREEDING SEASON (SEPTEMBER 16).

* Construction noise monitoring shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained below 60 dB (A) hourly average or to the ambient noise level if it already exceeds 60 dB (A) hourly average. If not, other measures shall be implemented in consultation with the biologist and the City Manager, as necessary, to reduce noise levels to below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. Such measures may include, but are not limited to, limitations on the placement of construction equipment and the simultaneous use of equipment.

- B. IF LEAST BELL'S VIREO ARE NOT DETECTED DURING THE PROTOCOL SURVEY, THE QUALIFIED BIOLOGIST SHALL SUBMIT SUBSTANTIAL EVIDENCE TO THE CITY MANAGER AND APPLICABLE RESOURCE AGENCIES WHICH DEMONSTRATES WHETHER OR NOT MITIGATION MEASURES SUCH AS NOISE WALLS ARE NECESSARY BETWEEN MARCH 15 AND SEPTEMBER 15 AS FOLLOWS:
 - 1. IF THIS EVIDENCE INDICATES THE POTENTIAL IS HIGH FOR LEAST BELL'S VIREO TO BE PRESENT BASED ON HISTORICAL RECORDS OR SITE CONDITIONS, THEN CONDITION A.III SHALL BE ADHERED TO AS SPECIFIED ABOVE.
 - 2. IF THIS EVIDENCE CONCLUDES THAT NO IMPACTS TO THIS SPECIES ARE ANTICIPATED, NO MITIGATION MEASURES WOULD BE NECESSARY.

Bio-14: Biological Resource Protection During Construction. The following general measures are required for mitigation of potential impacts to of SL, MHPA, ESA species, and CEQA related biological resources:

I. Prior to Construction

- A. **Biologist Verification** -The owner/permittee shall provide a letter to the City's Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist) as defined in the City of San Diego's Biological Guidelines (2012), has been retained to implement the project's biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project.
- B. **Preconstruction Meeting -** The Qualified Biologist shall attend the preconstruction meeting, discuss the project's biological monitoring program, and arrange to perform any follow up mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.
- C. **Biological Documents -** The Qualified Biologist shall submit all required documentation to MMC verifying that any special mitigation reports including but not limited to, maps, plans, surveys, survey timelines, or buffers are completed or scheduled per City Biology Guidelines, Multiple Species Conservation Program (MSCP), Environmentally Sensitive Lands Ordinance (ESL), project permit conditions; California Environmental Quality Act (CEQA); endangered species acts (ESAs); and/or other local, state or federal requirements.
- D. BCME -The Qualified Biologist shall present a Biological Construction Mitigation/Monitoring Exhibit (BCME) which includes the biological documents in C above. In addition, include: restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, burrowing owl exclusions, etc.), avian or other wildlife surveys/survey schedules (including general avian nesting and USFWS protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/ barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City ADD/MMC. The BCME shall include a site plan, written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule. The BCME shall be approved by MMC and referenced in the construction documents.
- E. Avian Protection Requirements To avoid any direct impacts to raptors and/or any native/migratory birds, removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, the Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of nesting birds on the proposed area of disturbance. The pre-construction survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the pre-construction survey to City DSD for review and approval prior to initiating any construction activities. If nesting birds are detected, a letter report or mitigation plan in conformance with the City's Biology Guidelines and applicable State and Federal Law (i.e. appropriate follow up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report or mitigation plan shall be submitted to the City for review and approval and implemented to the satisfaction of the City. The City's

MMC Section and Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction.

- F. **Resource Delineation -** Prior to construction activities, the Qualified Biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats and verify compliance with any other project conditions as shown on the BCME. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora & fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize attraction of nest predators to the site.
- G. **Education** –Prior to commencement of construction activities, the Qualified Biologist shall meet with the owner/permittee or designee and the construction crew and conduct an on-site educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna (e.g., explain the avian and wetland buffers, flag system for removal of invasive species or retention of sensitive plants, and clarify acceptable access routes/methods and staging areas, etc.).

II. During Construction

- A. Monitoring- All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on "Exhibit A" and/or the BCME. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the pre-construction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR shall be e-mailed to MMC on the 1st day of monitoring, the 1st week of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery.
- B. **Subsequent Resource Identification -** The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna onsite (e.g., flag plant specimens for avoidance during access, etc.). If active nests or other previously unknown sensitive resources are detected, all project activities that directly impact the resource shall be delayed until species specific local, state or federal regulations have been determined and applied by the Qualified Biologist.

III. Post Construction Measures

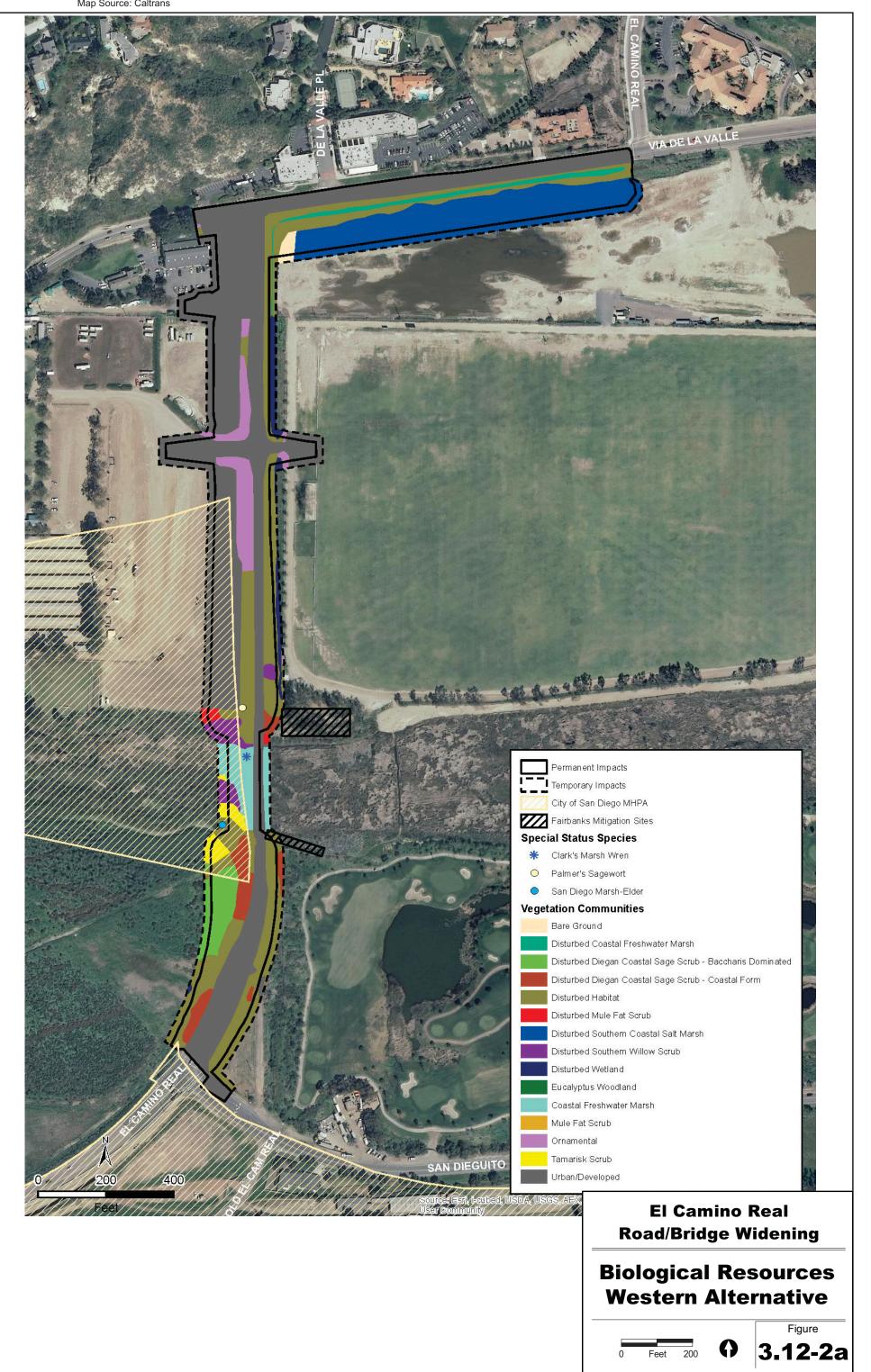
A. In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL and MSCP, State CEQA, and other applicable local, state and federal law. The Qualified Biologist shall submit a final BCME/report to the satisfaction of the City ADD/MMC within 30 days of construction completion.

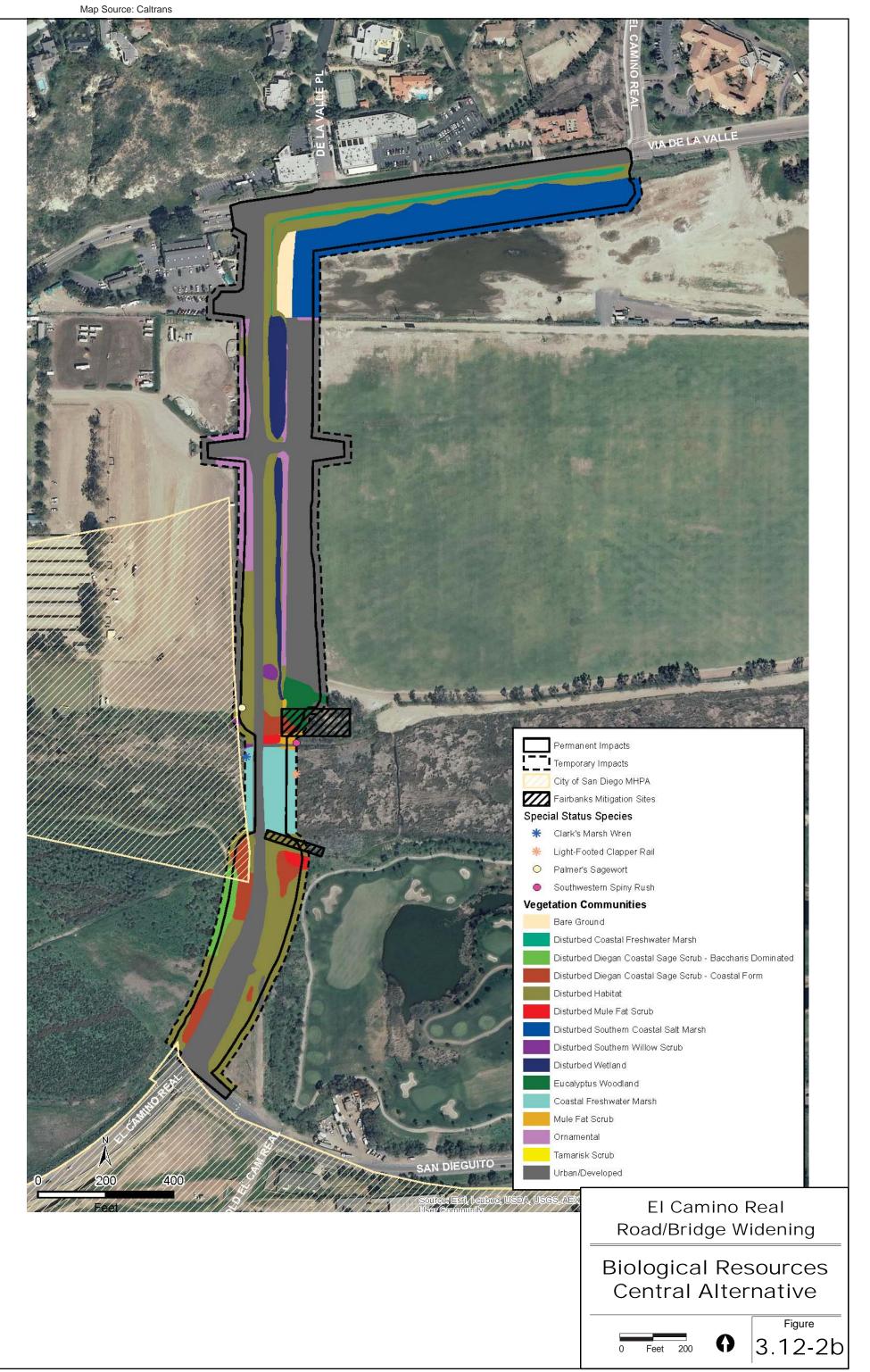
3.12.6 Significant and Unmitigable Impacts under CEQA

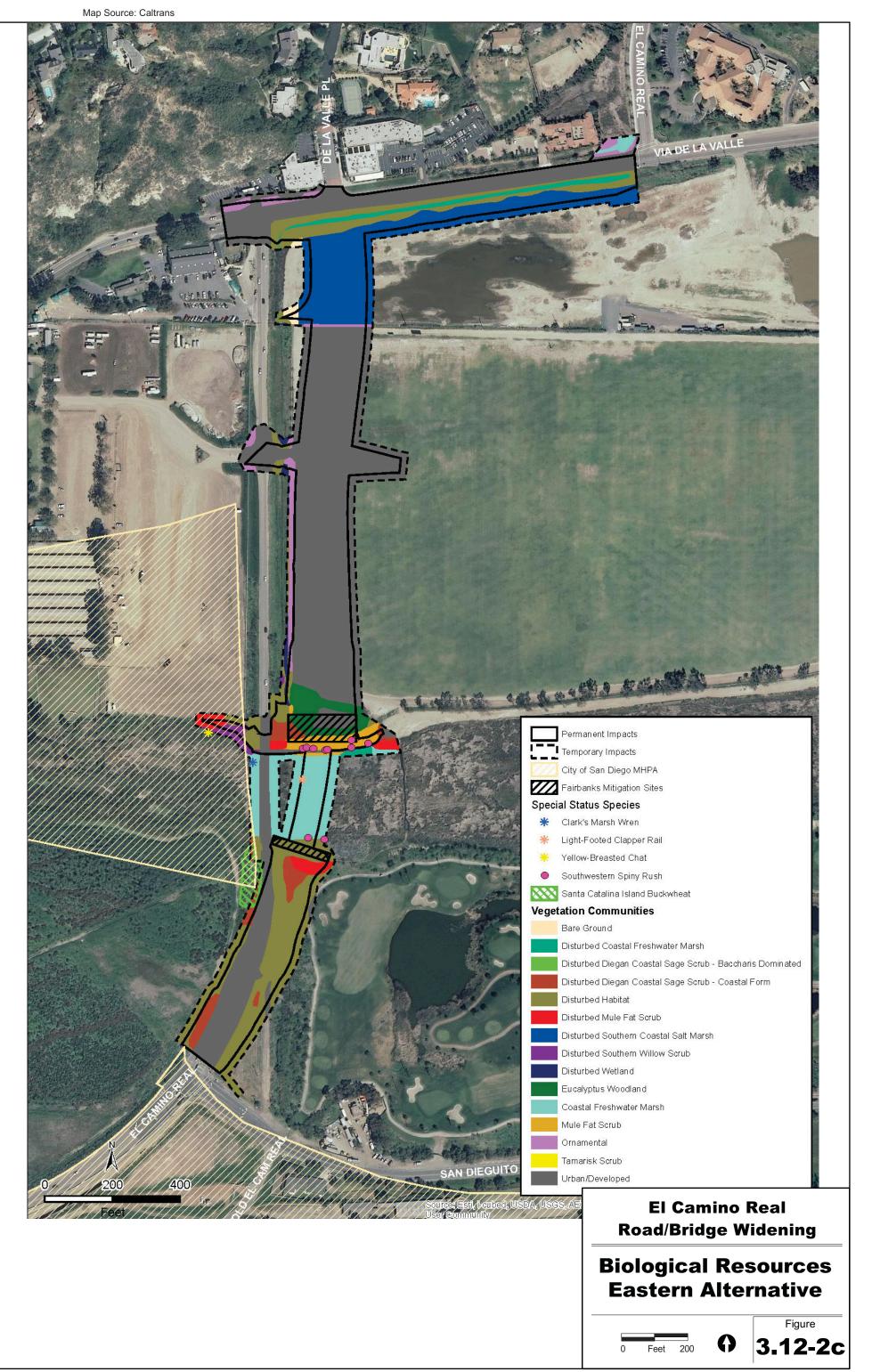
Implementation of the mitigation measures proposed above would mitigate all CEQA significant impacts to biological resources to below a level of significance. No unmitigable project impacts would occur.

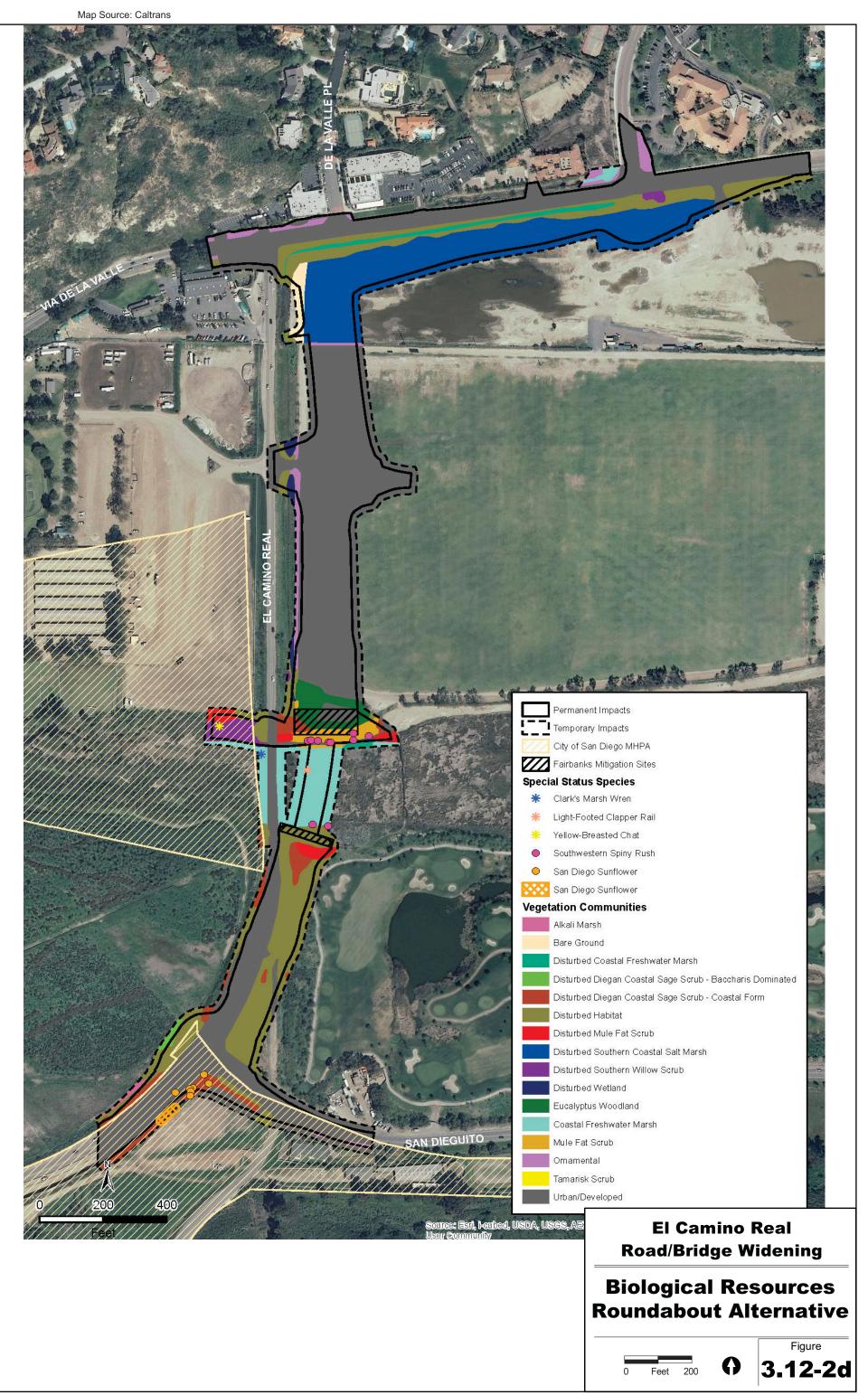
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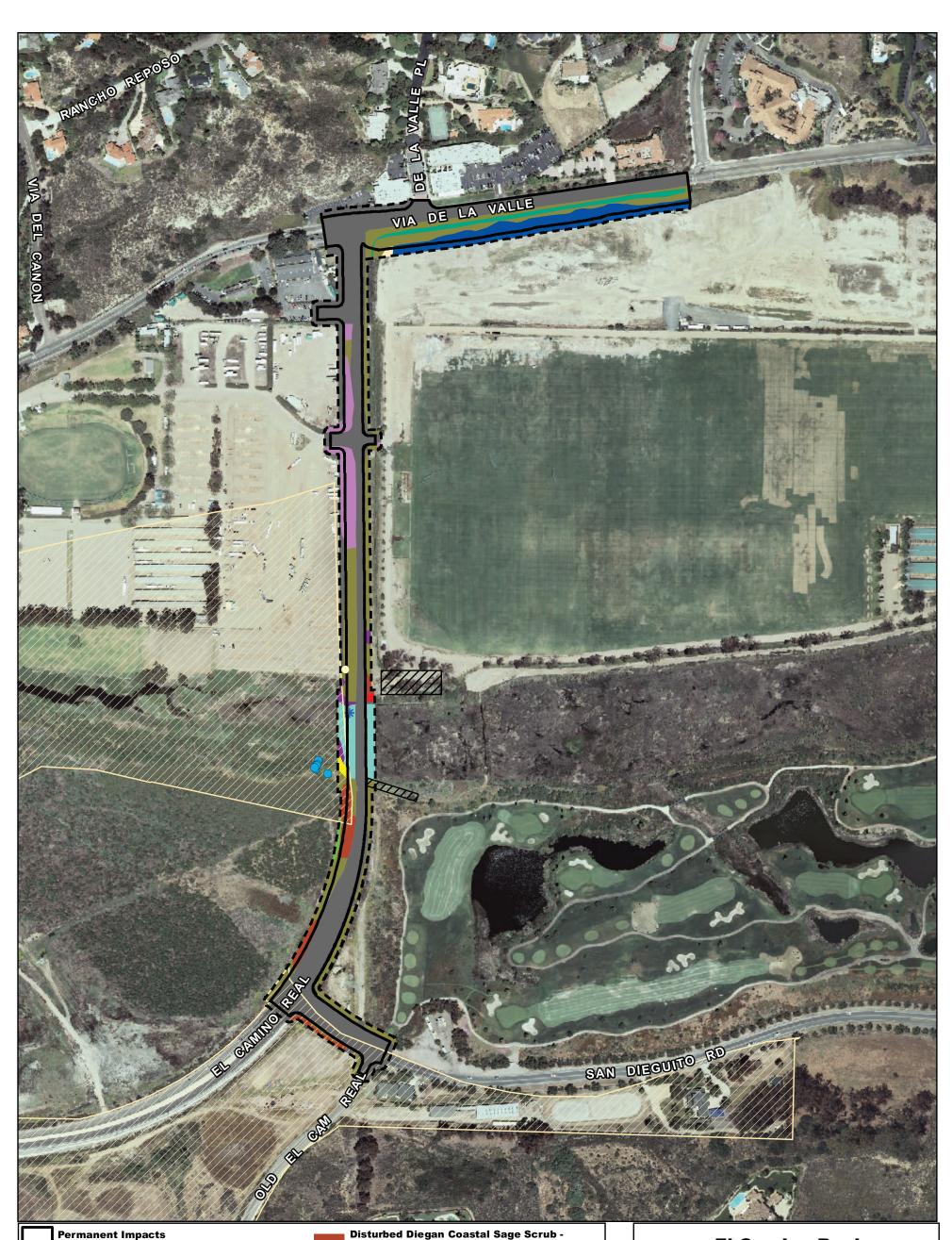












Permanent Impacts
I Temporary Impacts
City of San Diego MHPA
Fairbanks Mitigation Sites

- Special Status Species
- * Clark's Marsh Wren
- Palmer's Sagewort
- San Diego Marsh-Elder

Vegetation Communities

Bare Ground

- **Disturbed Coastal Freshwater Marsh**
- Disturbed Diegan Coastal Sage Scrub -Baccharis Dominated

Coastal Form Disturbed Habitat Disturbed Mule Fat Scrub Disturbed Southern Coastal Salt Marsh Disturbed Southern Willow Scrub Disturbed Wetland Eucalyptus Woodland Coastal Freshwater Marsh Ornamental Tamarisk Scrub Urban/Developed El Camino Real Road/Bridge Widening

Biological Resources Road Capacity and Bicycle Safety Alternatives

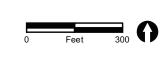
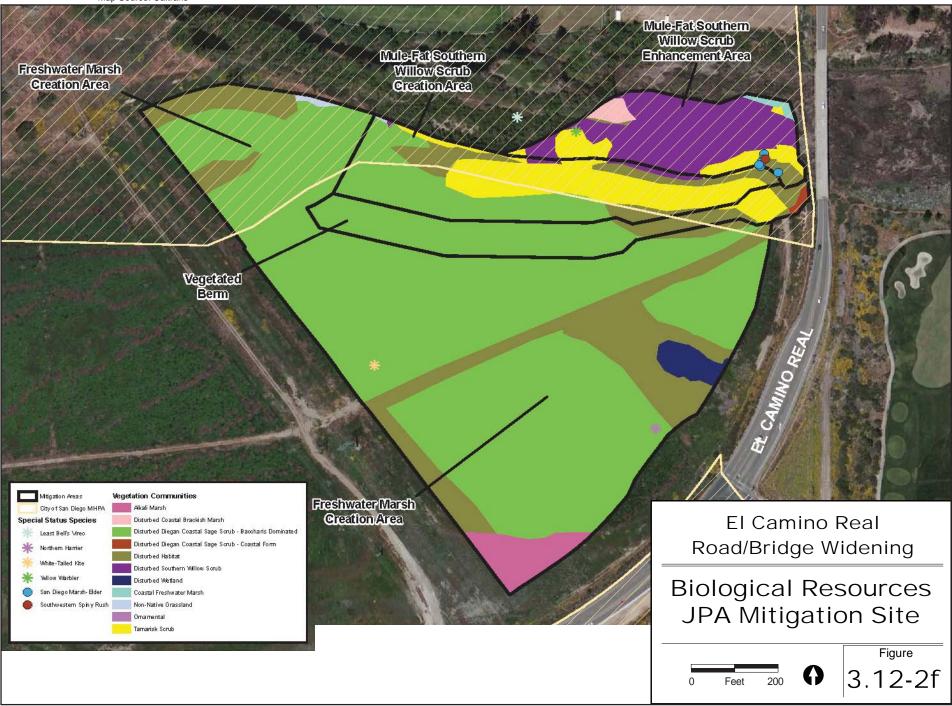
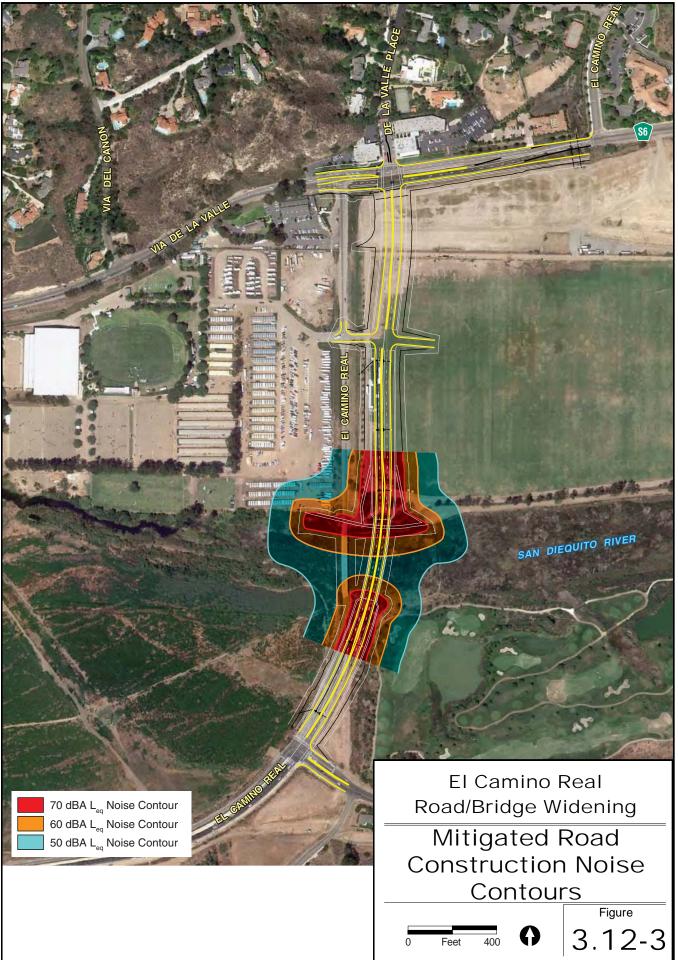
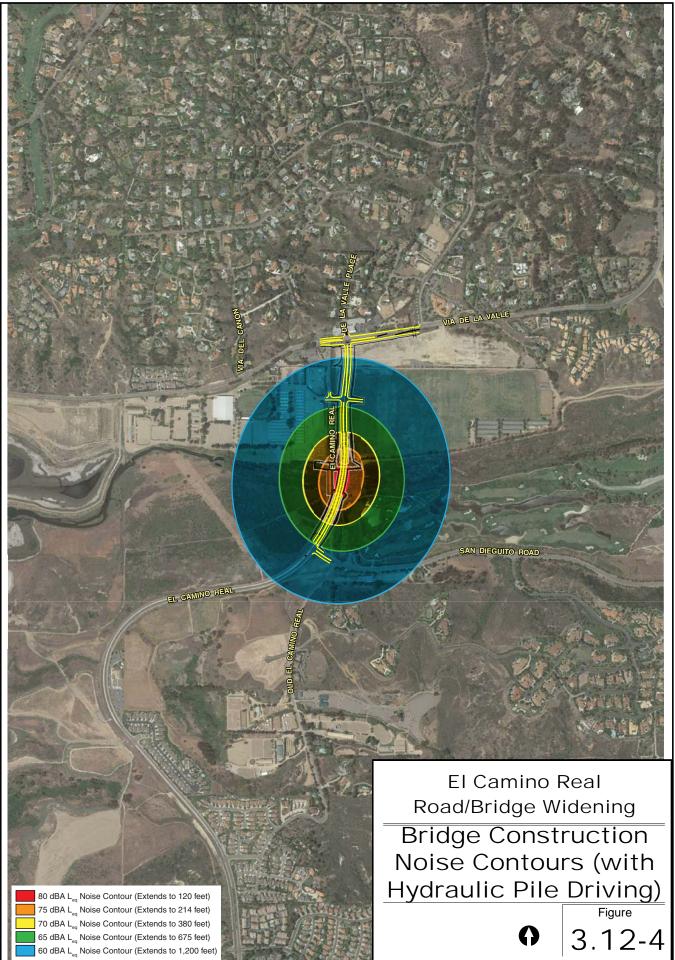


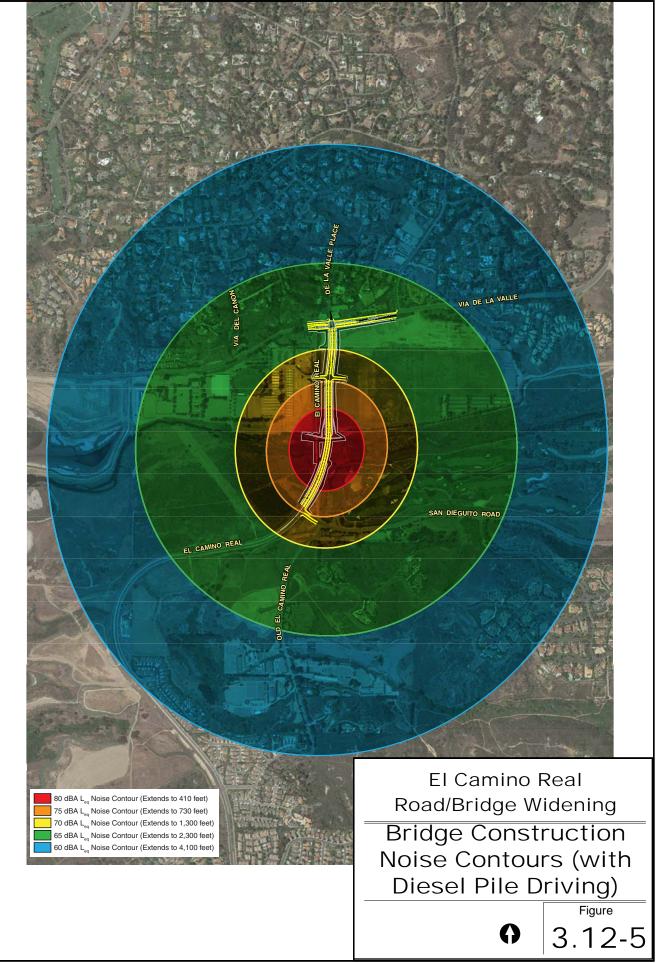
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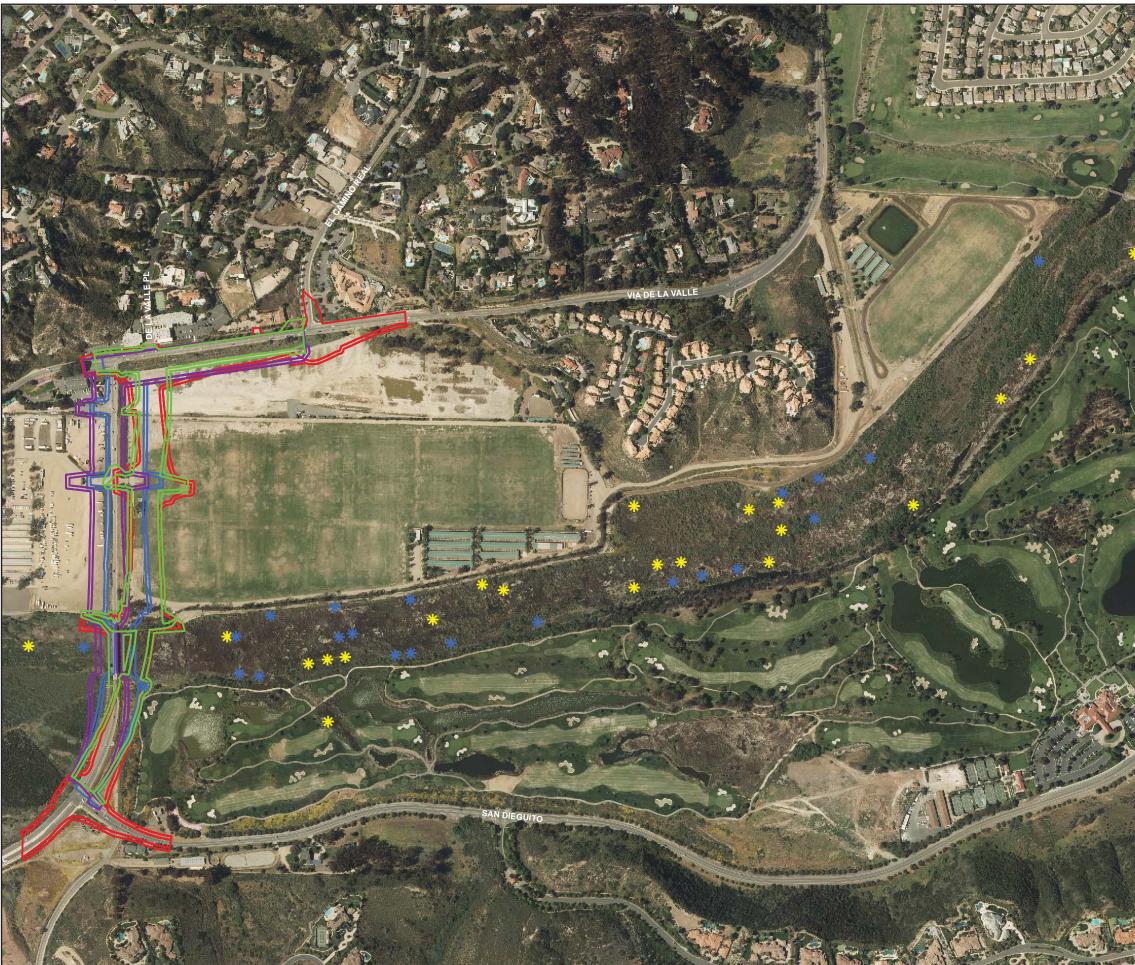
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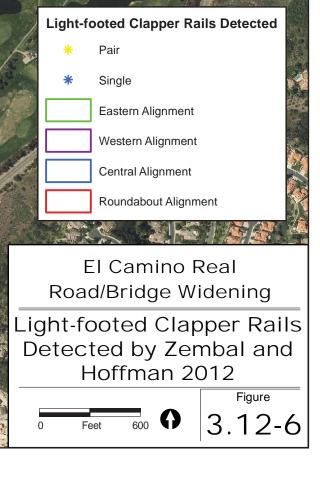












3.13 GREENHOUSE GAS EMISSIONS

The following section addresses the effects of project implementation with regard to climate change. First, greenhouse gas (GHG) emissions that would be generated by buildout of the project are compared to regional and state GHG emissions reduction targets. Second, the project is evaluated for consistency with plans adopted for the purpose of reducing GHG emissions.

3.13.1 Regulatory Setting and Methodology

3.13.1.1 Legislations, Plans and Policies

International. There are several international panels and agencies working on developing treaties and responding to growing concern about pollutants in the upper atmosphere and the potential problem of climate change. These include the World Meteorological Organization and the United Nations Environmental Program, which established the Intergovernmental Panel on Climate Change in 1988. In 1994, the United States joined a number of other nations in signing an international treaty known as the United Nations Framework Convention on Climate Change (UNFCCC). Knowing that the UNFCCC did not contain the legally binding measures that would be required to meaningfully address global climate change, a conference of the UNFCCC signatory nations was held in 1995 that launched a new round of discussions to determine more detailed and stronger commitments for industrialized countries. After 2.5 years of negotiations, the Kyoto Protocol was adopted in December 1997 (UNFCCC 2007).

While the 1997 Kyoto Protocol shared the UNFCCC's objectives, it committed signatories to individual, legally binding targets to limit or reduce their GHG emissions. There have been several amendments to the Kyoto Protocol, including the 2001 Marrakesh Accords, the 2009 Copenhagen Accords, and the 2010 Cancun Accords. As of September 2011, 191 governments had signed and ratified the Kyoto protocol, although the United States is not one of them. Most recently, the 2011 UN Climate Change Conference in Durban, South Africa resulted in the agreement to a legally binding treaty, called the Durban Platform, which will be prepared by 2015 and take effect in 2020. Unlike the Kyoto Protocol, the Durban Platform includes developing countries and the United States.

The above efforts focus on the international community's work to address climate change on a global scale. Legislation at the federal and state level provide guidance on requirements and standards for GHG reduction measures that are useful for assessing potential project impacts.

Federal. The multiple federal regulations that apply to this issue are highlighted below.

Climate Change Action Plan

Adopted in 1993, the U.S. Climate Change Action Plan (CCAP) consists of voluntary actions to reduce all significant GHGs from all economic sectors. Backed by federal funding, the CCAP supports cooperative partnerships between the government and the private sector in establishing flexible and cost-effective ways to reduce GHG emissions. The CCAP encourages investments in new technologies, but also relies on previous actions and programs focused on saving energy, reducing transportation emissions, improving forestry management, and reducing waste.

GHG Emissions Intensity Reduction Programs

The GHG Emissions Intensity is the ratio of GHG emissions to economic output. In 2002, the U.S. GHG Emissions Intensity was 722 metric tons per million dollars of gross domestic product

(EPA 2007). In February 2002, the U.S. set a goal to reduce this GHG Emissions Intensity by 18 percent by 2012 through various reduction programs, including those identified in the CCAP. New programs included the Energy Star program, which labels energy-efficient appliances and products, and the Green Power Partnership, which promotes replacing electricity consumption with green (i.e., renewable) energy sources.

Corporate Average Fuel Economy Standards

The federal Corporate Average Fuel Economy (CAFE) standards determine the fuel efficiency of certain vehicle classes in the U.S. As part of the Energy and Security Act of 2007, the CAFE standards were increased for new light-duty vehicles to 35 miles per gallon (mpg) by 2020. In May 2009, plans were announced to increase CAFE standards to require light-duty vehicles to meet an average fuel economy of 35.5 mpg by 2016. With improved gas mileage, fewer gallons of transportation fuel would be combusted to travel the same distance, thereby reducing nationwide GHG emissions associated with vehicle travel.

Mandatory Reporting of GHGs Rule

Starting January 1, 2010, large emitters of heat-trapping gases began collecting GHG data and reporting their annual GHG emissions to the EPA. The first reports were due March 31, 2011, with extensions available under certain circumstances to September 30, 2011. Under this reporting rule, approximately 10,000 facilities are covered, accounting for nearly 85 percent of the nation's GHG emissions. This mandatory reporting applies to fossil fuel and industrial GHG suppliers, motor vehicle and engine manufacturers, and facilities that emit 25,000 metric tons carbon dioxide (CO_2) equivalent (MTCO₂E) or more per year. Vehicle and engine manufacturers outside of the light-duty sector are required to begin phasing in their GHG reporting starting with engine/vehicle model year 2011.

State. The multiple state regulations that apply to this issue are highlighted below.

Statewide GHG Emission Targets - Executive Order S-3-05

Executive Order (EO) S-3-05, signed in 2005, established the following GHG emission reduction targets for the state of California and directed the Secretary of the California Environmental Protection Agency (CalEPA) to oversee the efforts made to reach these targets:

- By 2010, reduce GHG emissions to 2000 level.
- By 2020 reduce GHG emissions to 1990 levels.
- By 2050 reduce GHG emissions to 80 percent below 1990 levels.

California Global Warming Solutions Act - Assembly Bill 32

In response to EO S-3-05, the California legislature passed AB 32, the "California Global Warming Solutions Act of 2006," which required the CARB to adopt rules and regulations that would reduce statewide GHG emissions to 1990 levels by 2020. The CARB was also required to publish a list of discrete GHG emission reduction measures.

Climate Change Scoping Plan

As directed by AB 32, the Climate Change Scoping Plan prepared by CARB in December 2008 includes measures to reduce statewide GHG emissions to 1990 levels by 2020. These reductions are what CARB identified as necessary to reduce forecasted "business-as-usual" (BAU) 2020 emissions. The majority of reductions is directed at the sectors with the largest GHG emissions contributions—transportation and electricity generation—and involve statutory mandates affecting vehicle or fuel manufacture, public transit, and public utilities. For transportation, these

most notably include new standards on passenger vehicle emissions and a new low-carbon standard for vehicle fuel. For energy, the notable measures include new programs to increase energy efficiency and requirements for public utilities to supply up to 33 percent of their energy demand from renewable energy sources.

The Scoping Plan reduction measures and complementary regulations that are generally applicable to transportation projects such as the proposed project are described further in the following sections. To address emissions from vehicles, CARB is proposing a comprehensive three-prong strategy: reducing GHG emissions from vehicles, reducing the carbon content of the fuel these vehicles burn, and reducing the miles these vehicles travel.

AB 1493—Pavley GHG Vehicle Standards

In relation to the transportation sector, AB 1493 (also referred to as Pavley or the California Light-Duty Vehicle Greenhouse Gas Standards) was enacted on July 22, 2002. It required the CARB to develop and adopt regulations to lower GHG emissions from passenger vehicles and light duty trucks to the maximum extent technologically feasible, beginning with the 2009 model year. CARB adopted regulations in 2004, but due to litigation and delays from the EPA was not granted authority to proceed until June 2009. With this action, it is expected that the new regulations (Pavley I and II) will reduce GHG emissions from California passenger vehicles by about 18 percent statewide. These reductions are to come from improved vehicle technologies such as small engines with superchargers, continuously variable transmissions, and hybrid electric drives.

On March 22, 2012, CARB adopted a second, more stringent phase of the Pavley regulations. Known as the "Low Emission Vehicle (LEV) III Program," which is part of the Advanced Clean Cars program, LEV III covers Model Years 2017 to 2025. Through these new regulations:

- Greenhouse gas emissions from new cars will be cut 34 percent from 2016 levels.
- By 2025, greenhouse gases will be reduced by 52 million tons, the equivalent of taking 10 million cars off the road for a year.
- The package will result in a cumulative reduction of more than 870 million metric tons of greenhouse gases through 2050.

EO S-01-07—Low Carbon Fuel Standard

This executive order signed in 2007 directed that a statewide goal be established to reduce the carbon intensity of California's transportation fuels by at least 10 percent by 2020 through a Low Carbon Fuel Standard (LCFS). The LCFS is a performance standard with flexible compliance mechanisms intended to incentivize the development of a diverse set of clean, low-carbon transportation fuel options. A 10 percent reduction in the intensity of transportation fuels is expected to equate to a reduction of 16.5 million metric tons CO₂ equivalent (MMTCO₂E) in 2020. However, in order to account for possible overlap of benefits between LCFS and the Pavley GHG standards, CARB has discounted the contribution of LCFS to 15 MMTCO₂E (CARB 2008b).

Refiners and ethanol producers filed a lawsuit over implementation of the LCFS, arguing the rules penalize suppliers that use crude oil or ethanol from outside the state and would lead to higher costs for consumers. As a result, implementation of the LCFS is currently on hold following a judge's stay in the matter, handed down in late 2011.

Regional Transportation-related GHG Targets

The Regional Transportation-Related GHG Targets measure included in the Scoping Plan identifies policies to reduce transportation emissions through changes in future land use patterns and community design, as well as through improvements in public transportation, that reduce VMT which, in turn, will reduce vehicle emissions. CARB expects that this measure will reduce transportation-related GHG emissions by about 5 MMTCO₂E or 4 percent of the total statewide reductions attributed to the capped sectors. Specific regional reduction targets established through Senate Bill (SB) 375 (see discussion below) will determine more accurately what reductions can be achieved through this measure.

SB 375—Regional Emissions Targets

SB 375 signed in 2008 requires CARB to set regional targets for reducing passenger vehicle GHG emissions in accordance with the Scoping Plan. Its purpose is to align regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocation to reduce GHG emissions by promoting high-density, mixed-use developments around mass transit hubs.

The CARB, in consultation with the Metropolitan Planning Organizations (MPOs), was required to provide each affected region with passenger vehicle GHG emissions reduction targets for 2020 and 2035 by September 30, 2010. On September 23, 2010, CARB approved the reduction targets for the San Diego region. The San Diego region will be required to reduce GHG emissions from cars and light trucks 7 percent per capita by 2020 and 13 percent by 2035 (SANDAG 2010).

Once reduction targets are established, each of California's MPOs must prepare and adopt a Sustainable Communities Strategy (SCS) that demonstrates how the region will meet its GHG reduction targets through integrated land use, housing, and transportation planning. After the SCS is adopted by the MPO, the SCS will be incorporated into that region's federally enforceable regional transportation plan (RTP). On October 28, 2011, the SANDAG Board of Directors certified the Final EIR and adopted the 2050 RTP/SCS. It is the first such plan in the state that includes an SCS (SANDAG 2011).

CARB is also required to review each final SCS to determine whether it would, if implemented, achieve the GHG emission reduction target for its region. The SANDAG Board of Directors found that the measures in the 2050 RTP/SCS would meet the region's target of reducing GHG emissions from cars and light trucks 7 percent per capita by 2020 and 13 percent by 2035 (SANDAG 2011).

EO S-7-04/SB 1505—California Hydrogen Highway Network

This executive order signed in 2004 designated California's 21 interstate freeways as the California Hydrogen Highway Network, and directed the CalEPA and all other relevant state agencies to plan and build a network of hydrogen-fueling stations along these roadways and in the urban centers. This EO also called for the CalEPA and others to develop a California Hydrogen Economy Blueprint Plan (Blueprint Plan; CalEPA 2005) for the rapid transition to a hydrogen economy in California. The Blueprint Plan was delivered to the Governor in May 2005.

In response to this EO, SB 1505 (Lowenthal), chaptered on September 30, 2006, required the CARB to adopt regulations to ensure that the production and use of hydrogen for transportation purposes contributes to the reduction of GHGs and other air contaminants (Union of Concerned Scientists 2007). The regulation, referenced as the Environmental and Energy Standards for Hydrogen Production, is currently in the development process and was expected to be approved by CARB before the end of 2010. To date this has not occurred.

SB 97—CEQA GHG Amendments

SB 97 (Dutton), passed by the legislature and signed in 2007, required the Office of Planning and Research to prepare, develop, and transmit to the Resources Agency amendments to the CEQA guidelines (Guidelines) to assist public agencies in the evaluation and mitigation of GHGs or the effects of GHGs as required under CEQA, including the effects associated with transportation and energy consumption. Proposed amendments to the state CEQA Guidelines for GHG emissions were adopted on December 30, 2009, and became effective March 18, 2010.

Section 15064.4 of the amended Guidelines includes the following requirements for determining the significance of impacts from GHG emissions:

- (a) The determination of the significance of GHG emissions calls for a careful judgment by the lead agency consistent with the provisions in section 15064. A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate, or estimate the amount of GHG emissions resulting from a project. A lead agency shall have discretion to determine, in the context of a particular project, whether to:
 - (1) Use a model or methodology to quantify GHG emissions resulting from a project, and which model or methodology to use. The lead agency has discretion to select the model or methodology it considers most appropriate provided it supports its decision with substantial evidence. The lead agency should explain the limitations of the particular model or methodology selected for use; and/or
 - (2) Rely on a qualitative analysis or performance-based standards.

While the amendments require calculation of a project's contribution, they do not establish a standard by which to judge a significant effect or a means to establish such a standard.

Local. The multiple local regulations that apply to this issue are highlighted below.

San Diego Sustainable Community Program

In 2002, the San Diego City Council unanimously approved the San Diego Sustainable Community Program (SCP) and requested that an *Ad Hoc* Advisory Committee be established to provide recommendations that would decrease GHG emissions from City operations. Actions identified in the SCP include:

- 1. Participation in the International Council for Local Environmental Initiatives (ICLEI) Cities for Climate Protection (CCP) Campaign to reduce GHG emissions, and in the California Climate Action Registry;
- 2. Establishment of a reduction target of 15 percent by 2010, using 1990 as a baseline (Note: this reduction target was not met. As of 2006, the region has an 18 percent increase in emissions over 1990 levels, commensurate with population growth.); and
- 3. Direction to use the recommendations of the *Ad Hoc* Advisory Committee as a means to expand the GHG Emission Reduction Action Plan for the City organization and broaden its scope to include community actions.

Cities for Climate Protection

As a participant in the ICLEI CCP Program, the City made a commitment to voluntarily decrease its GHG emissions by 2030. The Program includes five milestones: (1) establish a CCP campaign, (2) engage the community to participate, (3) sign the U.S. Mayors Climate Protection Agreement, (4) take initial solution steps, and (5) perform a GHG audit. The City has advanced past Milestone 3 by signing the Mayor's agreement and establishing actions to decrease City Operations' emissions.

Climate Protection Action Plan

In July 2005, the City of San Diego developed a Climate Protection Action Plan (CPAP) that identifies policies and actions to decrease GHG emissions from City operations. Recommendations included in CPAP for transportation included measures such as increasing carpooling and transit ridership, improving bicycle lanes, and converting the City vehicle fleet to low-emission or non-fossil-fueled vehicles. Recommendations in the CPAP for energy and other non-transportation emissions reductions included increasing building energy efficiency (i.e., requiring that all City projects achieve the U.S. Green Building Council's Leadership in Energy and Environmental Design (LEED) Silver standard); reducing waste from City operations; continuing use of landfill methane as an energy source; reducing the urban heat island by avoiding dark roofs and roads which absorb and retain heat; and increasing shade tree and other vegetative cover plantings. Because of City actions implemented earlier between 1990 and 2002, moderate GHG emissions reductions were reported in the CPAP. City actions taken to capture methane gas from solid waste landfills and sewage treatment plants resulted in the largest decrease in GHG emissions. The City of San Diego General Plan includes a Policy CE-A.13 to regularly monitor and update the CPAP.

Sustainable Building Policies

The City aims to reduce GHG emissions by requiring sustainable development practices in City operations and incentivizing sustainable development practices in private development. In Council Policy 900-14—Green Building Policy, adopted in 1997, Council Policy 900-16—Community Energy Partnership, and the updated Council Policy 900-14—Sustainable Buildings Expedite Program, last revised in 2006, the City establishes a mandate for all City projects to achieve the U.S. Green Building Council's LEED Silver standard for all new buildings and major renovations over 5,000 square feet. Incentives are also provided to private developers through the Expedite Program, which expedites project review of green building projects and discounts project review fees.

The City has also enacted codes and policies aimed at helping the City achieve the State's 75 percent waste diversion target, including the Refuse and Recyclable Materials Storage Regulations (Municipal Code Chapter 14, Article 2, Division 8), Recycling Ordinance (O-19678 Municipal Code Chapter 6, Article 6, Division 7), and the Construction and Demolition (C & D) Debris Deposit Ordinance (0-19420 & 0-19694 Municipal Code Chapter 6, Article 6, Division 6).

General Plan

The City of San Diego 2008 General Plan includes several climate change-related policies aimed at reducing GHG emissions from future development and City operations. The Land Use and Community Planning Element, the Mobility Element, the Urban Design Element, and the Public Facilities, Services and Safety Element identify GHG reduction and climate change adaptation goals. These elements contain policy language related to sustainable land use patterns, alternative modes of transportation, energy efficiency, water conservation, waste reduction, and greater landfill efficiency. Cumulative impacts of GHG emissions were qualitatively analyzed and determined to be significant and unavoidable in the 2008 Program EIR for the General Plan. A Program EIR Mitigation Framework was included that indicated "for each future project requiring mitigation (measures that go beyond what is required by existing programs, plans and regulations), project-specific measures will [need to] be identified with the goal of reducing incremental project-level impacts to less than significant; or the incremental contributions of a project may remain significant and unavoidable where no feasible mitigation exists."

Climate Mitigation and Action Plan

A citywide Climate Mitigation and Adaptation Plan (CMAP) is currently under development to provide a mechanism for the City to achieve the goals of AB 32 and the CARB Scoping Plan. The CMAP elements are being prepared pursuant to guidance from the amended CEQA Guidelines and CARB recommendations for what constitutes an effective GHG reduction plan. Section 15183.5 of the amended Guidelines includes direction on preparing a plan that would serve to tier and streamline the analysis of GHG emissions. It is anticipated that the City's CMAP would offer both proactive options (mitigation) and also a plan to live with the consequences (adaptation) of global warming. The City's Draft CMAP was released for review in September 2014.

Climate Action Strategy

The SANDAG Climate Action Strategy, adopted in 2010, is a long-range policy (year 2030) that focuses on transportation, electricity, and natural gas sectors. It is a complement to the Regional Energy Strategy 2030 Update and feeds into the SANDAG RTP and Regional Comprehensive Plan. As indicated above, per the requirements of SB 375, San Diego's reduction targets have been incorporated into the 2050 RTP and SCS for the San Diego region.

3.13.1.2 Methodology

Emission estimates were calculated for the three GHGs of primary concern (CO₂, methane $[CH_4]$, and N₂O) that would be emitted from project construction and operation of the project. Typical operational emissions from a project include the following sources: on-road vehicular traffic, electricity generation, natural gas consumption, water usage, and solid waste management. However, in the case of this roadway improvement project, construction and on-road vehicular traffic are the only sources of GHG emissions. Like the existing GHG emissions, landscaping, irrigation, and street lighting would be minimal and similar to the existing condition, and future GHG emissions from these sources were assumed to be negligible.

Emissions. Construction GHG emissions were estimated using CalEEMod Version 2011.1.1 released by CARB in March 2011 (CARB 2011). CalEEMod estimates construction emissions for each year of construction activity based on the annual construction equipment profile and other factors determined as needed to complete all phases of construction by the target completion year. As such, each year having reported construction emissions has varying quantities of GHG emissions. However, the AEP has recommended that total construction GHG emissions resulting from a project be amortized over 30 years and added to operational GHG emissions (AEP 2010). Estimates of the total emissions from all construction activities estimated by CalEEMod were thus divided by 30, in accordance with the AEP recommendations.

GHG emissions due to on-road vehicular traffic were calculated using existing and projected VMT for the affected roadway segments, average vehicle fuel economy, and gasoline GHG emission factors. Vehicle emissions in metric tons of CO_2 equivalent were estimated through a series of calculations based on the following equation:

$$E = EF \times Fuel \times C \times GWP$$

Where,

Ε	=	emission in metric tons per year
EF	=	an emission factor normalized for engine fuel consumption and
		expressed in units of pounds of GHG per gallon of transportation fuel
Fuel	=	the total quantity of fuel consumed per year

= a constant reflecting the conversion of pounds to metric tons С GWP = the global warming potential of each GHG

The average vehicle emission factors used in this analysis are identified in Table 3.13-1.

Gas	Vehicle Emission Factors (pounds/gallon gas)
Carbon	19.564
Dioxide	
Methane	0.00055
Nitrous Oxide	0.0002
Source: Bay Are	ea Air Quality Management

Table 3.13-1 Vehicle GHG Emission Factors

District 2006.

Annual fuel consumption was obtained by multiplying the project's ADT by the roadway length to derive total VMT, which was then multiplied by average vehicle mileage. This fuel-based method of estimating GHG emissions from on-road vehicles is commonly used to estimate regional emissions from the transportation sector (University of California Transportation Center 1996, 2000), and is similar to the method CARB used in its 2020 BAU Forecast.

Total GHG emissions are expressed in terms of MTCO₂E. CO₂-equivalent emissions are the preferred way to assess combined GHG emissions because they give weight to the GWP of a gas. Carbon dioxide has a GWP of 1. Thus the GWP is a measure of the potential of a gas to warm the global climate in the same amount as an equivalent amount of emissions of CO₂. Methane has a GWP of 21, and N₂O has a GWP of 310, which means they have a greater global warming effect than CO₂.

900 MTCO₂E Screening Criterion. The City has not adopted its own GHG Thresholds of Significance for CEOA. To determine when a GHG analysis would be required, the City is following guidance from the California Air Pollution Control Officers Association (CAPCOA) report CEQA & Climate Change, dated January 2008, for interim screening criteria. To determine when a cumulatively significant contribution of GHGs has occurred, the City is using information from the CARB Scoping Plan and BAU 2020 Forecast (CAPCOA 2008).

An annual 900-metric-ton screening criterion for determining when a detailed GHG reduction analysis is required was chosen by the City based on available guidance from the CAPCOA report. The CAPCOA report references the 900-metric-ton guideline as a conservative threshold for requiring further analysis and mitigation. This emission level is based on the amount of vehicle trips, the typical energy and water use, and other factors associated with projects (City of San Diego 2008b).

The City of San Diego uses the 900 MTCO₂E net increase "trigger" for determining when a project is required to demonstrate a GHG reduction when compared to BAU. CAPCOA identifies the following project types shown in Table 3.13-2 that are estimated to emit approximately 900 metric tons or MTCO₂E of GHGs annually as shown. Projects that meet the following criteria are not required by the City of San Diego to prepare a detailed BAU GHG technical analysis report. For projects that emit a net increase of GHGs in excess of 900 MTCO₂E annually, the City requires a GHG emissions analysis to demonstrate that the project design achieves a 28.3 percent reduction relative to BAU GHG emissions.

Project Type	Project Size that Generates Approximately 900 MTCO ₂ E of GHGs per Year
Single Family Residential	50 units
Apartments/Condominiums	70 units
General Commercial Office Space	35,000 square feet
Retail Space	11,000 square feet
Supermarket/Grocery Space	6,300 square feet

 Table 3.13-2

 Project Types that Require a GHG Analysis and Mitigation

The proposed roadway improvement project does not meet any of the project types shown in Table 3.13-2. However, as demonstrated in the impacts section below, net GHG emissions due to implementing any of the project alternatives are not projected to exceed the City's GHG screening criterion of 900 MMTCO₂E annually. Thus, further analysis to determine the project's reduction compared to the BAU 2020 model is not required (City of San Diego 2008b).

3.13.2 Affected Environment

3.13.2.1 Greenhouse Gases of Primary Concern

There are numerous GHGs, both naturally occurring and artificial, that are measured based on the average time they stay in the atmosphere and their potential to trap heat and warm the atmosphere (also referred to as GWP). Of the most common GHGs, carbon dioxide, methane, and nitrous oxide (N₂O) are produced by both biogenic (natural) and anthropogenic (human) sources. These gases are the GHGs of primary concern in this analysis. The remaining gases occur solely as the result of human processes. Hydrofluorocarbons (HFCs) are synthetic, man-made chemicals used as substitutes for ozone-depleting chlorofluorocarbons used in air conditioners and as refrigerants. Perfluorocarbons (PFCs) such as tetrafluoromethane (CF₄) are used primarily in aluminum production and semiconductor manufacture. Sulfur hexafluoride (SF₆) is used for insulation in electric power transmission and distribution equipment. HFCs, PFCs, and SF₆ are thus not of primary concern to a roadway/bridge project. CO₂ would be emitted primarily through the combustion of fossil fuels in vehicles and construction equipment. Smaller amounts of CH₄ and N₂O would also be emitted from these sources.

3.13.2.2 State and Regional GHG Inventories

The CARB performs statewide GHG inventories that are divided into nine broad sectors of economic activity: agriculture, commercial, electricity generation, forestry, high GWP emitters, industrial, recycling and waste, residential, and transportation. Emissions are quantified in MMTCO₂E. CARB's estimated statewide GHG emissions for the following sectors: agriculture, commercial, electricity generation, forestry, high GWP, industrial, recycling and waste, residential, transportation, and other. Transportation-related emissions consistently contribute the most GHG emissions, followed by electricity generation and industrial emissions. According to data from the CARB, it appears that statewide GHG emissions peaked in 2004, and are now beginning to decrease (CARB 2010).

A San Diego regional emissions inventory was prepared by the University of San Diego School of Law, Energy Policy Initiative Center in 2006 and focused on the following sectors: agriculture/forestry/lane use, electricity, natural gas consumption, industrial, transportation, civil aviation, rail, water-borne navigation, waste, and others. Similar to the statewide emissions, transportation-related GHG emissions contributed the most countywide, followed by emissions associated with energy use.

3.13.2.3 Existing On-Site GHG Inventories

The existing segment of El Camino Real between Via de la Valle and San Dieguito Road is a 23-foot-wide, two-lane, collector roadway. The existing segment of Via de la Valle between El Camino Real and El Camino Real North is a 40-foot-wide, two-lane, undivided roadway. The existing segment of San Dieguito Road between El Camino Real and Old El Camino Real is a 40-foot-wide, two-lane roadway.

The existing source of GHG emissions is vehicles traveling these roadway segments. To establish the existing baseline, GHG emissions associated with these sources were calculated. Then, to determine the project's GHG impacts, the "baseline plus project" GHG emissions were compared to the baseline GHG emissions.

The existing roadways currently carry 16,011 ADT on the 0.2-mile portion of Via de la Valle between El Camino Real and El Camino Real North, 14,559 ADT on the 0.5-mile portion of El Camino Real between Via de la Valle and San Dieguito Road, and 14,564 ADT on the 0.1-mile portion of San Dieguito Road between El Camino Real to Old El Camino Real. Multiplying the traffic volume by the roadway lengths results in 11,550 VMT per day and 4.2 million VMT annually. This equates to a total of 2,014 MTCO₂E of GHGs annually that would be emitted by vehicles in the near-term under the no project scenario and constitutes the baseline against which project emissions will be evaluated. Vehicle emission calculation methodology and assumptions are discussed below in Section 3.13.3.

Existing landscape irrigation and street lighting is minimal, and existing GHG emissions due to these sources were assumed to be negligible.

3.13.2.4 Consequences of Climate Change

The increase in the earth's temperature is expected to have wide-ranging effects on the environment. Although global climate change is anticipated to affect all areas of the globe, there are numerous implications of direct importance to California. Statewide average temperatures are anticipated to increase by between 3 and 10.5° F by 2100. Some climate models indicate that this warming may be greater in the summer than in the winter. This could result in widespread adverse impacts to ecosystem health, agricultural production, water use and supply, and energy demand. Increased temperatures could reduce the Sierra Nevada snowpack and put additional strain on the region's water supply. Increased temperatures could also lead to increased energy demand for cooling. In addition, increased temperatures could result in lower inversion layer levels leading to a decrease in air quality. It is important to note that even if current GHG emissions were to be eliminated or dramatically reduced, it is projected that the effect of existing CO₂ concentrations in the atmosphere would continue to affect global climate for centuries.

Throughout the state and the region, global climate and local microclimate changes could cause a sea level rise. The absorbed infrared radiation from increasing atmospheric GHG concentrations is expected to increase oceanic temperatures, causing thermal expansion of the world's oceans. It

is predicted that the mean sea level rise in California will be between 1.0 meter and 1.4 meters by 2100 (King et al. 2011). It is believed that while large sections of the Pacific coast are not vulnerable to flooding, they are highly susceptible to erosion. It is estimated that a 1.4-meter sea-level rise will accelerate erosion, resulting in a loss of 41 square miles of California's coast by 2100 (California Climate Change Center 2009).

3.13.3 Impacts

Issues to be addressed are the following:

- *Issue 1: Would the proposed project generate GHGs, either directly or indirectly, that may have a significant impact on the environment.*
- *Issue 2: Would the proposed project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.*

3.13.3.1 Issue 1a: GHG Operational Emissions

There would be no operational GHG emissions associated with electricity generation, natural gas combustion, water use, or solid waste generation. Future GHG emissions due to landscaping irrigation and street lighting were assumed to be negligible. The project would not substantially change these from the existing condition. Therefore, the following is a discussion of the GHG emissions due to vehicles that would occur as a result of the project.

The project proposes the widening of El Camino Real from two (2) to four (4) lanes and to replace the existing river bridge with a new bridge. The project also proposes to widen Via de la Valle easterly from El Camino Real to El Camino Real North. A Transportation Analysis was prepared to determine any traffic-related impacts within the study area to roadways and intersections due to the build alternatives: Central Alignment Alternative, Western Alignment Alternative, Eastern Alignment Alternative, Roundabout Alternative, and Lower Elevation Alternative (Urban Systems Associates 2012). Future traffic volumes are the same for all alternatives. Two build alternatives — the Road Capacity Alternative and Bicycle Safety Alternative — are not considered viable by Caltrans/FHWA and were not included in the Transportation Analysis; however, because the ADT would not change between the alternatives, the analysis presented below applies to all alternatives.

The Transportation Analysis evaluated existing conditions in the project area, existing with project conditions, project opening day (2016), and future (2035) conditions with and without the project. While opening day and future traffic volumes would be greater than the existing condition due to regional growth, the project would not generate an increase in traffic volumes, and the project does not propose to alter the general external trip distribution patterns within the study area (Urban Systems Associates 2012). Existing, Existing Plus Project, Opening Day, and future (2035) vehicle GHG emissions under the project would be the same as the corresponding existing, near-term, and future vehicle GHG emissions under No Project. Therefore, there would be no net increase in vehicle GHG emissions due to any of the project alternatives.

Existing. The existing roadways currently carry 16,011 ADT on the 0.2-mile portion of Via de la Valle between El Camino Real and El Camino Real North, 14,559 ADT on the 0.5-mile portion of El Camino Real between Via de la Valle and San Dieguito Road, and 14,564 ADT on the 0.1-mile portion of San Dieguito Road between El Camino Real to Old El Camino Real. Multiplying the traffic volume by the roadway lengths results in 11,550 VMT per day and 4.2 million VMT

annually, which equates to a total of 2,014 MTCO₂E of GHGs annually that would be emitted by vehicles in the near-term under all the alternatives.

Existing Plus Project. During the "baseline plus project" scenario, the roadways would carry 16,347 ADT on the 0.2-mile portion of Via de la Valle between El Camino Real and El Camino Real North, 16,015 ADT on the 0.5-mile portion of El Camino Real between Via de la Valle and San Dieguito Road, and 14,753 ADT on the 0.1-mile portion of San Dieguito Road between El Camino Real to Old El Camino Real. Multiplying the traffic volume by the roadway lengths results in 12,353 VMT per day and 4.5 million VMT annually, which equates to a total of 2,155 MTCO₂E of GHGs annually that would be emitted by vehicles under all alternatives for this scenario.

Opening Day. On opening day, the roadways would carry 19,860 ADT on the 0.2-mile portion of Via de la Valle between El Camino Real and El Camino Real North, 16,327 ADT on the 0.5-mile portion of El Camino Real between Via de la Valle and San Dieguito Road, and 14,772 ADT on the 0.1-mile portion of San Dieguito Road between El Camino Real to Old El Camino Real. Multiplying the traffic volume by the roadway lengths results in 13,280 VMT per day and 4.8 million VMT annually, which equates to a total of 2,316 MTCO₂E of GHGs annually that would be emitted by vehicles under all the alternatives for this scenario.

Horizon Year 2035. In the horizon year 2035, the roadways would carry 26,000 ADT on the 0.2-mile portion of Via de la Valle between El Camino Real and El Camino Real North, 33,000 ADT on the 0.5-mile portion of El Camino Real between Via de la Valle and San Dieguito Road, and 19,500 ADT on the 0.1-mile portion of San Dieguito Road between El Camino Real to Old El Camino Real. Multiplying the traffic volume by the roadway lengths results in 23,124 VMT per day and 8.4 million VMT annually, which equates to a total of $4,033 \text{ MTCO}_2\text{E}$ of GHGs annually for all alternatives.

However, as identified in Section 3.13.1.2, Regulatory Setting and Methodology, there are several plans, policies, and regulations aimed at reducing transportation-related GHG emissions statewide by 2020. These regulations would reduce statewide transportation-related GHG emissions by increasing average vehicle fuel economy and decreasing engine combustion emissions.

The key regulations affecting vehicle emissions include the national CAFE Standards that would increase average fuel economy to 35 mpg by 2020; the state Pavley GHG Vehicle Emissions Standards, which require improved vehicle engine technologies to reduce GHG emissions from vehicles; and the LCFS, which reduces the carbon intensity of the fuel vehicles burn. All of these actions have been approved by either the national or the state legislatures and are coming into effect on a staggered timeline. CARB estimates that an approximate 46.7 MMTCO₂E reduction, or 32 percent of the reduction target for capped sources and 27 percent of the total 174 MMTCO₂E reduction target specified in the Scoping Plan, would be achieved through just these transportation-related regulatory actions. A third action, the Vehicle Efficiency Measure, is estimated by CARB to add another 4.5 MMTCO₂E, or 2.5 percent, to the total statewide reductions. The national CAFE Standards, while not quantified in the CARB Scoping Plan, would likely contribute to further reductions in statewide vehicle GHG emissions.

It is assumed that vehicles in the horizon year 2035 would benefit from the new regulations, and associated vehicle emissions would accordingly decrease. By accounting for the Scoping Plan measures already adopted, the estimated vehicle emissions could decrease by nearly 30 percent, resulting in year 2035 vehicular GHG emissions of 2,904 MTCO₂E annually (compared to the 4,033 MTCO₂E annually estimated for BAU) that would be emitted by vehicles in the horizon

year under both the project and the no project scenario. These transportation-related emissions reductions would be achieved through mandatory regulations applicable to all vehicle emissions within the state.

Table 3.13-3 summarizes the existing, existing plus project, opening day, and future VMT and vehicle GHG emissions calculations (RECON 2012).

	Annual VMT	Annual GHG Emissions (MTCO2E)	Increase Relative to Baseline
Existing (Baseline)	4,215,846	2,014	0
Existing Plus Project	4,508,725	2,155	141
Opening Day	4,847,310	2,316	302
Horizon Year 2035	8,440,111	4,033	2,109 (890*)

Table 3.13-3 Vehicle GHG Emissions

*2,904MTCO₂E accounting for anticipated reductions due to Pavley and LCFS.

As discussed above, traffic would increase due to regional growth, but future traffic-related GHG emissions would occur with or without the project. Therefore, there would be no net increase in GHG emissions for any of the alternatives relative to the no project conditions. In addition, because the alternatives analyzed propose to increase El Camino Real from two (2) to four (4) lanes, it is anticipated that the proposed project would reduce emissions due to improved traffic flow.

3.13.3.2 Issue 1b: GHG Construction Emissions

Construction activities emit GHGs primarily though combustion of fuels (mostly diesel) in the engines of off-road construction equipment and through combustion of diesel and gasoline in onroad construction vehicles and in the commute vehicles of the construction workers. Smaller amounts of GHGs are also emitted through the energy use embodied in any water use (for fugitive dust control) and lighting for the construction activity. Every phase of the construction process, including demolition, grading, paving, and building, emits GHG emissions in volumes proportional to the quantity and type of construction equipment used. The heavier equipment typically emits more GHGs per hour of use than the lighter equipment because of their greater fuel consumption and engine design.

Construction is expected to take between 2.5 and 3.5 years, depending on the alternative. Construction would not take place during the avian breeding season (February 1 through September 15).

For modeling purposes, it was assumed that construction would begin September 2013 and would include multiple phases. The Central Alignment, Western Alignment, and Lower Elevation alternatives would be constructed in two stages. The Eastern Alignment Alternative would be constructed in a single stage completely free of the existing El Camino Real bridge and road north of the bridge.

The construction phases are listed below.

- Mobilize equipment to the project site
- Construct one two-lane side of the new bridge
- Clear widened road right of way
- Construct off-site utility relocations, including drainage culverts and channels
- Construct one two-lane side of the widened roadway
- Reconstruct Polo Club driveway
- Shift traffic from the existing roadway and bridge to the new road and bridge
- Construct the other two-lane side of the widened roadway
- Reconstruct Horsepark driveway, and Mary's Tack and Feed driveway
- Install slope landscaping and enhancements
- Demolish the existing bridge
- Steepen the river banks under the bridge
- Construct the other two-lane side of the bridge
- Make closure pour to join the two halves of the bridge (optional)
- Construct intersection modifications and adjacent roadway transitions
- Stripe the travel lanes and install signals

Steps involved in constructing the new bridge are listed below.

- Construct bridge trestle above the river
- Drill holes for piles below ground, install the rebar (reinforcing steel bars), and pour the concrete to form the piles
- Install the rebar for the bridge columns (piers) above ground, place forms, and pour the concrete to form the piers
- Construct the falsework (temporary support structure)
- Install the rebar for the bottom of the bridge (stem and soffit), place forms, and pour the concrete
- Install the rebar for the deck of the bridge, place forms, and pour the concrete
- Conduct finish work on the concrete and backfill
- Construct the approach slabs on each end of the bridge
- Remove the falsework and trestle
- Construct the sidewalk, barrier and handrail on each side of the bridge
- Make joint seals
- Finish the bridge surface with striping and other roadwork

The Central Alignment Alternative, Western Alignment Alternative, and Lower Elevation Alternative are anticipated to have the same construction phases and timeline. The alternatives are anticipated to span three breeding seasons. The phases and schedules for these alternatives are outlined in Figure 2-24 (Central Alignment), Figure 2-27 (Western Alignment), and 2-29 (Lower Elevation). The Bicycle Safety and Road Capacity Alternatives (Figures 2-25 and 2-26) are also anticipated to have construction phases and timelines that are similar to these three alternatives. However, due to their smaller overall footprint, air quality impacts resulting from construction of the Bicycle Safety or Road Capacity alternatives are anticipated to equal to or less than the

impacts associated with the Central Alignment, Western Alignment, and Lower Elevation Alignment Alternatives.

The Eastern Alignment Alternative and Roundabout Alternative are anticipated to have the same construction timeline. The alternatives are anticipated to span two breeding seasons. The phases and schedule for both of these alternatives are outlined in Figure 2-28

The existing bridge is approximately 340 feet by 23 feet. Therefore, demolition of the existing bridge was assumed to be equivalent to a two-story, 7,820 square foot building. The CalEEMod default number of trips required to haul this material was assumed.

It was assumed 20 acres of the project site would be graded. The project would also involve grading the 25 acre mitigation site.

The Central Alignment Alternative, Western Alignment Alternative, and Lower Elevation Alternative are anticipated to result in similar quantities of total net import of fill as the Eastern Alignment Alternative (Rick Engineering 2012). It was assumed the Central Alignment Alternative, Western Alignment Alternative, and Lower Elevation Alternative result in a total net import of 51,600 cy of fill. The Eastern Alignment Alternative is anticipated to result in a total net import of 51,600 cy of fill. The Roundabout Alternative is anticipated to result in a total net import of 57,000 cy of fill.

The project engineers provided the number and pieces of construction equipment per phase (Rick Engineering 2012). This construction list was cross checked with the types of off-road equipment types available in CalEEMod. Table 3.13-4 summarizes the construction equipment parameters. It was assumed that all equipment would operate simultaneously during each construction phase. Table 3.13-5 summarizes the estimated GHG emissions due to construction activities. CalEEMod input and output are provided in Volume 2.

TABLE 3.13-4
CONSTRUCTION EQUIPMENT PARAMETERS

Phase	Equipment Type	Quantity	CalEEMod Parameters			
Thase	Equipment Type	Quantity	Off-road Equipment Type	Horse Power	Load Factor	
	Concrete Pump	1	Pumps	84	0.74	
Approach Slabs	Concrete Truck	2	Off-Highway Trucks	381	0.57	
Backwalls/Backfill Columns R/F/P Construct Trestle Construct Trestle Deck R/F/P Deck R/F/P	Dump Truck	2	Off-Highway Trucks	381	0.57	
	Bulldozer	1	Rubber Tired Dozer	75	0.55	
Backwalls/Backfill	Dump Truck	2	Off-Highway Trucks	381	0.57	
Excavator Excavator Concrete Pump Concrete Truck Large Crane		1	Excavators	157	0.57	
	Concrete Pump	1	Pumps	84	0.74	
	Concrete Truck	2	Off-Highway Trucks	381	0.57	
	Large Crane	1	Cranes	208	0.43	
Columns R/F/P	Large Diameter Drill Rig	1	Bore/Drill Rigs	81	0.73	
	Semi Trailers*	1				
	Welding Equipment	2	Welders	46	0.45	
	Bobcat	1	Skid Steer Loader	75	0.55	
	Bulldozer	1	Rubber Tired Dozer	75	0.55	
Construct Trestle	Dump Truck	2	Off-Highway Trucks	381	0.57	
	Excavator	1	Excavators	157	0.57	
	Floating Barge**	1				
	Front-end Loader	1	Rubber Tired Loaders	75	0.55	
	Large Crane	1	Cranes	208	0.43	
	Large Crane	1	Cranes	208	0.43	
Construct Trestle	Large Pile Crane with Vibrating Hammer	1	Bore/Drill Rigs	81	0.73	
	Semi Trailers*	1	bole bin Rigs		0.75	
	Small Boat **	1				
	Welding Equipment	2	Welders	46	0.45	
	Concrete Pump	1	Pumps	84	0.74	
	Concrete Truck	2	Off-Highway Trucks	381	0.57	
	Form work	1	Other Material Handling Equipment	196	0.59	
Deck R/F/P	Front-end Loader	1	Rubber Tired Loaders	75	0.55	
	Large Crane	1	Cranes	208	0.43	
	Semi Trailers*	1		200	0.45	
	Welding Equipment	2	Welders	46	0.45	
	Bobcat	1	Skid Steer Loader	75	0.55	
	Bulldozer	1	Rubber Tired Dozer	75	0.55	
	Floating Barge**	1		,,,	0.55	
	Front-end Loader	1	Rubber Tired Loaders	75	0.55	
Demo Existing	Large Crane	1	Cranes	208	0.43	
Bridge	Large Pile Crane with Vibrating Hammer	1	Bore/Drill Rigs	81	0.43	
	Semi Trailers	1		381	1	
	Small Boat**	1	Off-Highway Trucks	381	0.57	
	Specialized Equipment	1	Other Construction Equipment	327	0.62	

TABLE 3.13-4 CONSTRUCTION EQUIPMENT PARAMETERS (continued)

Phase	Equipment Type	Ouantity	CalEEMod Parameters			
rnase	Equipment Type	Quantity	Off-road Equipment Type	Fype Horse Power 75 75 84 381 381 157 uipment 196 75 208 81 381 381 157 9 196 75 208 81 381 208 81 381 208 81 381 208 81 381 208 81 381 46 208 81 381 46 208 81 381 46 208 81 381 46 81 381 46 81 381 <td< th=""><th>Load Factor</th></td<>	Load Factor	
	Bobcat	1	Skid Steer Loader	75	0.55	
	Bulldozer	1	Rubber Tired Dozer	75	0.55	
	Concrete Pump	1	Pumps	84	0.74	
	Concrete Truck	2	Off-Highway Trucks	Horse Power 75 75 r 84 ks 381 ks 381 ks 381 ks 381 157 adling Equipment 196 ers 75 208 81 ks 81 ks 208 81 ks 381 46 208 81 ks 381 208 81 ks 381 46 208 81 ks 381 46 208 81 ks 381 46 8 46 8 46	0.57	
	Dump Truck	2	Off-Highway Trucks	381	0.57	
	Excavator	1	Excavators	Horse PowerLoad Factor75 0.55 75 0.55 75 0.55 84 0.74 381 0.57 381 0.57 381 0.57 157 0.59 75 0.59 75 0.55 208 0.43 81 0.73 381 0.57 157 0.59 75 0.55 208 0.43 81 0.73 381 0.57 0.624646 0.45 84 0.74 381 0.57 208 0.43 81 0.73 381 0.57 208 0.43 81 0.73 381 0.57 46 0.45 208 0.43 81 0.73 381 0.57 46 0.45 81 0.57 46 0.45 81 0.57 75 0.55 75 0.55	0.57	
	Floating Barge**	1	*		1	
	Form work	1	Other Material Handling Equipment	196	0.59	
Demobilization	Front-end Loader	1	Rubber Tired Loaders	Horse PowerLoad Factor75 0.55 75 0.55 75 0.55 84 0.74 381 0.57 381 0.57 157 0.57 157 0.57 157 0.57 157 0.59 75 0.55 208 0.43 81 0.73 81 0.73 381 0.57 381 0.57 208 0.43 81 0.73 381 0.57 208 0.43 81 0.73 381 0.57 208 0.43 81 0.73 381 0.57 46 0.45 208 0.43 81 0.73 381 0.57 46 0.45 81 0.73 381 0.57 46 0.45 81 0.73 381 0.57 46 0.45 8 0.43 162 0.61 381 0.57		
	Large Crane	1	Cranes	208	0.43	
	Large Diameter Drill Rig	1	Bore/Drill Rigs	81	0.73	
	Large Pile Crane with Vibrating Hammer	1	Bore/Drill Rigs	81	0.73	
	Semi Trailers*	1	Off-Highway Trucks			
	Small Boat**	1				
	Specialized Equipment	1	Other Construction Equipment	327	0.62	
	Welding Equipment	2	Welders	46	0.45	
	Concrete Pump	1	Pumps			
	Concrete Truck	2	Off-Highway Trucks			
	Large Crane	1	Cranes		0.43	
Drill Piles	Large Diameter Drill Rig	1	Bore/Drill Rigs	81	0.73	
	Semi Trailers*	1	Off-Highway Trucks			
	Welding Equipment	2	Welders	46	0.45	
	Large Crane	1	Cranes	208	0.43	
Falsework	Large Pile Crane with Vibrating Hammer	1	Bore/Drill Rigs	81	0.73	
	Semi Trailers*	1	Off-Highway Trucks	381	0.57	
	Welding Equipment	2	Welders	46	0.45	
	Compactor	2	Plate Compactors	8	0.43	
	Motor Graders	1	Graders	162	0.61	
Grading of	Off-Highway Dump Truck	2	Off-Highway Trucks	i	0.57	
Mitigation Site	Track Loader	1	Tractors/Loaders/Backhoes	75	0.55	
	Track Type Tractor	2	Tractors/Loaders/Backhoes	75	0.55	
	Wheel Tractor Scraper	1	Scrapers	75	0.55	

TABLE 3.13-4 CONSTRUCTION EQUIPMENT PARAMETERS (continued)

Phase	Equipment Type	Ouantity	CalEEMod Parameters			
Thase	Equipment Type	Quantity	Off-road Equipment Type	Horse Power 75 75 75 84 381 381 157 11 11 11 11 11 11 11 11 157 11	Load Factor	
	Bobcat	1	Skid Steer Loader	75	0.55	
	Bulldozer	1	Rubber Tired Dozer	75	0.55	
	Concrete Pump	1	Pumps	84	0.74	
	Concrete Truck	2	Off-Highway Trucks	381	0.57	
	Dump Truck	2	Off-Highway Trucks	381	0.57	
	Excavator	1	Excavators	157	0.57	
	Floating Barge	1			1	
	Form work	1	Other Material Handling Equipment	196	0.59	
Mobilization	Front-end Loader	1	Rubber Tired Loaders	Horse PowerLoad Factor75 0.55 75 0.55 75 0.55 84 0.74 8 381 0.57 8 381 0.57 8 381 0.57 9 157 0.55 9 0.59 5 9 75 0.55 208 0.43 81 0.73 81 0.73 81 0.73 81 0.73 81 0.73 83 381 0.57 $-$ Equipment 327 0.62 46 0.45 75 0.55 8 381 0.57 Equipment 327 0.62 46 0.43 75 0.55 8 381 0.73 81 0.73 81 0.73 81 0.73 81 0.57 75 0.55 8331 0.57 75 0.55 8331 0.57 75 0.55 8331 0.57 75 0.55 8331 0.57 75 0.55 8331 0.57 8331 0.57 8331 0.57 8331 0.57 8331 0.57 8331 0.57 8331 0.57 8331 0.57 8331 0.57 8331 0.57 <td< td=""></td<>		
	Large Crane	1	Cranes	208	0.43	
	Large Diameter Drill Rig	1	Bore/Drill Rigs	81	0.73	
	Large Pile Crane with Vibrating Hammer	1	Bore/Drill Rigs			
	Semi Trailers*	1	Off-Highway Trucks			
	Small Boat	1				
	Specialized Equipment	1	Other Construction Equipment	81 0.73 cs 381 0.57 Equipment 327 0.62 46 0.45 r 75 0.55 cs 381 0.57 Equipment 327 0.62 46 0.45 157 r 75 0.55 cs 381 0.57 Equipment 327 0.62 208 0.43		
	Welding Equipment	2	Welders			
	Bulldozer	1	Rubber Tired Dozer	75 0.55		
	Dump Truck	2	Off-Highway Trucks			
Post-tension Bridge	Excavator	1	Excavators			
	Specialized Equipment	1	Other Construction Equipment			
	Large Crane	1	Cranes			
	Large Crane	1	Cranes			
Remove Falsework	Large Pile Crane with Vibrating Hammer	1	Bore/Drill Rigs			
	Semi Trailers*	1	Off-Highway Trucks		0.57	
	Welding Equipment	2	Welders		Ì	
	Bobcat	1	Skid Steer Loader			
	Bulldozer	1	Rubber Tired Dozer			
	Dump Truck	2	Off-Highway Trucks			
	Excavator	1	Excavators			
	Floating Barge	1				
	Front-end Loader	1	Rubber Tired Loaders	75	0.55	
Remove Trestle	Large Crane	1	Cranes			
	Large Crane	1	Cranes	l .		
	Large Pile Crane with Vibrating Hammer	1	Bore/Drill Rigs			
	Semi Trailers*	1	Off-Highway Trucks			
	Small Boat	1				
	Welding Equipment	2	Welders	16	0.45	

TABLE 3.13-4 CONSTRUCTION EQUIPMENT PARAMETERS (continued)

Phase	Equipment Type	Quantity	CalEEMod Parameters			
Thase	Equipment Type	Quantity	Off-road Equipment Type	Horse Power 89 89 Backhoes 75 82 8 8 8 ks 381 157 162 ks 381 208 381 208 381 208 381 208 75 Backhoes 75 89 89 Backhoes 75 82 8 ks 381 157 82 8 8 ks 381 157 162 ks 381 157 8 8 8 ks 381 162 8 ks 381 208 75 89 8 8 8 8 8 8 8 8 8 8 8	Load Factor	
	Asphalt Paver	1	Pavers	89	0.62	
	Backhoe Loader	1	Tractors/Loaders/Backhoes	75	0.55	
	Cold Planer	1	Paving Equipment	Horse Power 89 75 82 8 381 157 162 381 208 75 89 75 8 381 208 75 89 75 89 75 89 75 82 8 381 157 6 75 89 75 88 8 381 208 75 75 75 89 75 89 75 89 75 82 8 381 157 162 381 157 162 </td <td>0.53</td>	0.53	
	Compactor	2	Plate Compactors	8	0.43	
	Compactor	2	Plate Compactors	8	0.43	
	Concrete Truck	2	Off-Highway Trucks	381	0.57	
Roadway Work,	Excavator	1	Excavators	157	0.57	
North of Bridge	Flatbed Truck*	1				
-	Motor Graders	1	Graders	162	0.61	
	Off-Highway Dump Truck	2	Off-Highway Trucks	381	0.57	
	Small Crane	1	Cranes	208	0.43	
	Track Loader	1	Tractors/Loaders/Backhoes		0.55	
	Track Type Tractor	2	Tractors/Loaders/Backhoes	75	0.55	
	Wheel Tractor Scraper	1	Scrapers	75	0.55	
	Asphalt Paver	1	Pavers	89	0.62	
	Backhoe Loader	1	Tractors/Loaders/Backhoes	75	0.55	
	Cold Planer	1	Paving Equipment		0.53	
	Compactor	2	Plate Compactors	8	0.43	
	Compactor	2	Plate Compactors	8	0.43	
	Concrete Truck	2	Off-Highway Trucks	381	0.57	
	Excavator	1	Excavators	1	0.57	
Roadway Work, South of Bridge	Flatbed Truck*	1			89 0.62 75 0.55 82 0.53 8 0.43 381 0.57 157 0.57 162 0.61 381 0.57 208 0.43	
bouill of Dilage	Motor Graders	1	Graders	162	0.61	
	Off-Highway Dump Truck	2	Off-Highway Trucks	381	0.57	
	Small Crane	1	Cranes			
	Track Loader	1	Tractors/Loaders/Backhoes		1	
	Track Type Tractor	2	Tractors/Loaders/Backhoes	1	0.55	
	Wheel Tractor Scraper	1	Scrapers		0.55	
	Asphalt Paver	1	Pavers		0.62	
	Backhoe Loader	1	Tractors/Loaders/Backhoes		0.55	
	Cold Planer	1	Paving Equipment	82	0.53	
	Compactor	2	Plate Compactors	8	0.43	
	Compactor	2	Plate Compactors		0.43	
	Concrete Truck	2	Off-Highway Trucks		0.57	
Roadway Work, VDLV to ECR	Excavator	1	Excavators		0.57	
(North)	Flatbed Truck*	1			Ì	
	Motor Graders	1	Graders	162	0.61	
	Off-Highway Dump Truck	2	Off-Highway Trucks	1	0.57	
	Small Crane	1	Cranes		0.43	
	Track Loader	1	Tractors/Loaders/Backhoes	75	0.55	
	Track Type Tractor	2	Tractors/Loaders/Backhoes	75	0.55	
	Wheel Tractor Scraper	1	Scrapers	75	0.55	

TABLE 3.13-4 CONSTRUCTION EQUIPMENT PARAMETERS (continued)

			CalEEMod Parame	road Equipment Type Power Fac er Loader 75 0.5 Fired Dozer 75 0.5 String Dozer 75 0.5 hway Trucks 381 0.5 aterial Handling Equipment 196 0.5 Fired Loaders 75 0.5 208 0.4 208 0.4 ill Rigs 81 0.7 0.6 onstruction Equipment 327 0.6 way Trucks 381 0.5 onstruction Equipment 327 0.6 46 0.4 0.4 way Trucks 381 0.5 onstruction Equipment 327 0.6 46 0.4 0.4 84 0.7 0.5	
Phase	Equipment Type	Quantity	Off-road Equipment Type		Load Factor
	Bobcat	1	Skid Steer Loader	75	0.55
	Bulldozer	1	Rubber Tired Dozer	75	0.55
	Concrete Pump	1	Pumps	84	0.74
	Concrete Truck	2	Off-Highway Trucks	381	0.57
	Dump Truck	2	Off-Highway Trucks	381	0.57
	Excavator	1	Excavators	157	0.57
	Floating Barge**	1			
	Form work	1	Other Material Handling Equipment	196	0.59
Roadway/Grading	Front-end Loader	1	Rubber Tired Loaders	75	0.55
Work	Large Crane	1	Cranes	208	0.43
	Large Crane	1	Cranes	208	0.43
	Large Diameter Drill Rig	1	Bore/Drill Rigs	81	0.73
	Large Pile Crane with Vibrating Hammer	1	Bore/Drill Rigs	81	0.73
	Semi Trailers*	1			
	Small Boat**	1			
	Specialized Equipment	1	Other Construction Equipment	327	0.62
	Welding Equipment	2	Welders	46	0.45
	Concrete Pump	1	Pumps	84	0.74
Sidewalk, Barrier,	Concrete Truck	2	Off-Highway Trucks	381	0.57
Handrail	Specialized Equipment	1	Other Construction Equipment	327	0.62
	Welding Equipment	2	Welders	46	0.45
	Concrete Pump	1	Pumps	84	0.74
	Concrete Truck	2	Off-Highway Trucks	381	0.57
	Form work	1	Other Material Handling Equipment	196	0.59
Stem & Soffit R/F/P	Front-end Loader	1	Rubber Tired Loaders	75	0.55
	Large Crane	1	Cranes	208	0.43
	Semi Trailers*	1			
	Welding Equipment	2	Welders	46	0.45

* Semi Trailers and Flat Bed Trucks were not included as off-road construction equipment; they were assumed to be vendor trips and were entered into the model in the "Trips and VMT" and "on-Road Fugitive Dust" modules in CalEEMod.

** Floating Barge and Small Boat were not included as off-road construction equipment. It was assumed emissions would be minimal and therefor were not modeled separately.

Alternative*	Year	CO ₂	CH ₄	N ₂ O	MTCO ₂ E
	2013	295.53	0.03	0.00	296.09
Central	2014	1,378.69	0.12	0.00	1,381.18
Alignment,	2015	1,449.41	0.11	0.00	1,451.63
Western Alignment,	2016	1,299.10	0.10	0.00	1,301.17
Lower	2017	1,012.01	0.06	0.00	1,013.33
Elevation	Total	5,434.74	0.42	0.00	5,443.40
Lievation	Amortized Over 30 Years	181.16	0.01	0.00	181.45
	2013	315.29	0.03	0.00	315.88
	2014	1,239.49	0.11	0.00	1,241.74
Eastern	2015	1,434.65	0.11	0.00	1,437.04
Alignment	2016	702.17	0.04	0.00	702.92
	Total	3,691.60	0.29	0.00	3,697.58
	Amortized Over 30 Years	123.05	0.01	0.00	123.25
	2013	315.29	0.03	0.00	315.88
	2014	1,239.49	0.11	0.00	1,241.74
Roundabout	2015	1,434.65	0.11	0.00	1,437.04
Alignment	2016	727.57	0.04	0.00	728.33
	Total	3,717.00	0.29	0.00	3,722.99
	Amortized Over 30 Years	123.90	0.01	0.00	124.10

Table 3.13-5 Construction GHG Emissions (metric tons)

*Construction emissions associated with the Bicycle Safety and Roadway Capacity Alternatives are anticipated to be less than or equal to the emissions resulting from construction of the Central Alignment, Western Alignment, or Lower Elevation Alternatives.

As shown, depending on the alternative, project construction would result in approximately 124 to 181 MTCO₂E per year when amortized over 30 years.

3.13.3.3 Issue 2: GHG Plans, Policies, and Regulations Consistency

The project would not result in an increase in traffic on area roadways or an increase in VMT. Vehicles on roads in the project area would benefit from regulatory standards focused on the transportation sector. As shown in Table 3.13-5, the project would result in a net increase in GHG emissions of between 124.1 and 181.45 MTCO₂E per year. This is less than the City's screening criteria of 900 MTCO₂E per year. Therefore, a detailed BAU analysis is not required.

SANDAG's Regional Transportation Improvement Program (RTIP) is a multi-year program of proposed major highway, arterial, transit, and bikeway projects. The RTIP incrementally develops the RTP. This project is included in the 2030 RTIP and 2004 RTIP, and therefore would not conflict with the RTP or RTIP. Therefore, the project would not conflict with any plans, policies, or regulations aimed at reducing energy demand and reducing GHG emissions from operational sources. The project would not conflict with General Plan policies related to climate change. Additionally, construction emissions would be short term and would be substantially less than the City's 900 MTCO₂E annual screening threshold when amortized over 30 years.

3.13.3.4 No Build Alternative

Under the No Build Alternative, none of the project components that could generate GHG would be constructed. None of the potential impacts due to GHG emissions discussed in this section would occur.

3.13.4 Significance of Greenhouse Gas Emissions Impacts under CEQA

The conclusions of significance under CEQA for the alternatives analyzed are summarized in Table 3.13-6. The City has not adopted its own GHG Thresholds of Significance for CEQA. To determine when a GHG analysis would be required, the City is following guidance from the CAPCOA report *CEQA & Climate Change*, dated January 2008, for interim screening criteria.

As discussed above, there would be no net increase in operational traffic GHG emissions resulting from implementation of any of the alternatives. Further, depending on the alternative, project construction would result in GHG emissions of approximately 124 to 181 MTCO₂E per year when amortized over 30 years. Thus, total net annual GHG emissions resulting from implementation of any of the alternatives would be less than the City's 900 MTCO₂E annual screening threshold. Impacts of operational and construction emissions would be less than significant.

The project would not conflict with any plans, policies, or regulations aimed at reducing energy demand and reducing GHG emissions from operational sources. The project would not conflict with General Plan policies related to climate change. Impacts on plans, policies and regulations would be less than significant.

Impact	Threshold	Central	Road Capacity	Bicycle Safety	Western	Eastern	Round- about	Lower Elevation	No Build
Operational Emissions	Annual Screening Threshold	NS	NS	NS	NS	NS	NS	NS	NS
Construction Emissions	Annual Screening Threshold	NS	NS	NS	NS	NS	NS	NS	NS
Plans, Policies and Regulations	Conflicts	NS	NS	NS	NS	NS	NS	NS	NS

Table 3.13-6					
Summary of CEQA Significance for Greenhouse Gas Emissions Impacts					

NS = Not significant

SM = Significant and mitigable to below a level of significance

SU = Significant and unmitigable

3.13.5 Mitigation Measures

No impacts from greenhouse gas emissions would be significant under CEQA. No mitigation measures are necessary for any of the build alternatives.

SECTION 4 MANDATORY CEQA DISCUSSION AREAS

In accordance with CEQA Guidelines Section 15126.2, the EIR must include a discussion of the following issue areas:

- (a) The Significant Environmental Effects of the Proposed Project. (These effects were discussed at an equal level of detail for each build alternative in Section 3.)
- (b) Significant Environmental Effects Which Cannot be Avoided if the Proposed Project is Implemented. (This topic is discussed in Section 4.1, below)
- (c) Significant Irreversible Environmental Changes Which Would be Caused by the Proposed Project Should it be Implemented. (Per CEQA Guidelines Section 15127, this information need be included only in EIRs that involve the adoption, amendment, or enactment of a plan, policy, or ordinance of a public agency; the adoption by a Local Agency Formation Commission of a resolution making determinations; or a project which will be subject to the requirement for preparing an environmental impact statement pursuant to the requirements of NEPA. The first two conditions do not apply to the proposed project. Although the proposed project must satisfy the requirements of NEPA due to federal funding obligated by the FHWA, the project will only require an Environmental Assessment, not an Environmental Impact Statement. Therefore, the third condition also does not apply. However, to be consistent with other City EIRs, a discussion of irreversible changes is provided in Section 4.2, below.
- (d) Growth-Inducing Impact of the Proposed Project. (This topic is discussed in Section 4.3, below.)

In accordance with CEQA Guidelines Section 15130, an EIR shall discuss cumulative impacts of a project when the project's incremental effect is cumulatively considerable. According to CEQA Guidelines Section 15065(a)(3), "Cumulatively considerable" means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. (This topic is discussed in Section 4.4, below.)

In accordance with CEQA Guidelines Section 15128, an EIR shall contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. (This topic is discussed in Section 4.5, below.)

4.1 SIGNIFICANT ENVIRONMENTAL EFFECTS WHICH CANNOT BE AVOIDED IF THE PROPOSED PROJECT IS IMPLEMENTED

CEQA Guidelines Section 15126.2(b) requires an EIR to describe "any significant impacts, including those which can be mitigated but not reduced to a level of insignificance. Where there are impacts that cannot be alleviated without imposing an alternative design, their implications and the reasons why the project is being proposed, notwithstanding their effect, should be described." The discussion in this section relates solely to CEQA.

In Section 3, the components of each build alternative were analyzed to determine whether implementation of the project would cause significant impacts for different aspects of the individual technical issues. Significant impacts were identified by measuring the project's performance against specific CEQA significance thresholds. If significant impacts were identified under CEQA, mitigation measures were developed. In most cases, these measures would reduce significant impacts to below a level of significance. However, for certain issues, significant and unmitigable impacts would still occur. For some of these issues, implementation of one of the other build alternatives would alleviate the unmitigable significant impact. Unavoidable significant impacts, as defined by the CEQA analysis, are discussed below.

4.1.1 Traffic/Circulation

The Road Capacity Alternative would have significant and unmitigable impacts under CEQA for an increase in hazards to pedestrians and bicyclists, and for substantially restricting access to commercial and recreational facilities along the affected segment of El Camino Real. The Bicycle Safety Alternative would have significant and unmitigable impacts under CEQA for increasing hazards to pedestrians. Selection of any of the other build alternatives would avoid these significant and unmitigable traffic/circulation impacts.

4.1.2 Visual/Aesthetics

All build alternatives would have view impacts that would be significant and unmitigable under CEQA from blocking a view corridor and blocking a view of a public resource. The view blockage would be due to the fencing needed on the outside of the cantilever equestrian trail on the west side of the bridge. Eliminating the cantilever equestrian trail on the new bridge or changing the fencing enough to avoid view blockage (which is not considered feasible) would avoid this significant and unmitigable visual/aesthetics impact.

4.2 IRREVERSIBLE ENVIRONMENTAL CHANGES WHICH WOULD RESULT IF THE PROJECT IS IMPLEMENTED

In accordance with CEQA Guidelines Section 15126.2(c): "Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvements which provide access to a previously inaccessible area) generally commit future generations to similar uses. Also irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified." A discussion of this issue is presented below.

Implementation of any of the project build alternatives would involve a commitment of natural, physical, human, and fiscal resources. Land used in the construction of the proposed bridge/roadways and other facilities is considered an irreversible commitment during the time period that the land would be used for these improvements. However, if a greater need arises for use of the land or if the facilities are no longer needed, the land can be converted to another use. At present, there is no reason to believe such a conversion would ever be necessary or desirable. Given the location of the project, conversion to other uses, including open space or biological habitat, would be feasible if such action became necessary. In addition, the JPA Mitigation Site is proposed to be enhanced as biological habitat.

Fossil fuels, labor, and construction materials such as cement, aggregate, and bituminous material would be expended in constructing the bridge/roadways. Additionally, labor and natural resources would be used in the making of construction materials. Construction would also require a one-time expenditure of local, state and/or federal funds which are not retrievable but would be partially offset by savings in energy resulting from improvement of traffic conditions and enhancement of multimodal transportation, such as for pedestrians and bicyclists, for most of the alternatives. In addition to the costs of construction, there would be limited costs for maintenance and personnel. Although such resources are generally not retrievable, their commitment is based on the concept that residents in the immediate area, region and state would benefit from the improved quality of a transportation system that would facilitate other modes of travel in addition to vehicles. These benefits would consist of improved safety for bicyclists, equestrians, and pedestrians, savings in fuel, reduction in emissions of pollutants related to vehicles, and the enhancement of recreational and commuter facilities, all of which are expected to outweigh the commitment of resources.

Because the project represents improvements to an existing roadway, it would not involve any road or highway improvements that would provide vehicular access to previously inaccessible areas. Further, no major environmental accidents or hazards are anticipated to occur as a result of project implementation. As discussed in Section 3.8 of this recirculated EIR, none of the recorded hazardous materials sites located in the project vicinity were determined to be of concern for any of the build alternatives. In addition, typical worker safety and construction measures would be incorporated into the project to preclude adverse impacts from the potential presence of herbicides or pesticides due to historical farming on the proposed mitigation site owned by the JPA.

4.3 GROWTH-INDUCING IMPACTS

CEQA Guidelines Section 15126.2(d) requires a discussion of "the ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment." Induced growth is any growth that exceeds planned growth and results from new developments that would not have taken place without the proposed project. The ways in which a project could remove obstacles to population growth must be included in the discussion. Another topic that must be included is how the project "may encourage and facilitate other activities that could significantly affect the environment, either individually or cumulatively." The CEQA Guidelines note that growth in any area must not be assumed to be beneficial, detrimental, or of little significance to the environment. In terms of approved planning documents for the project area, it should be noted that widening El Camino Real to four lanes is part of the NCFUA Framework Plan, which is the adopted community plan for the project area.

Although the requirement to address growth-inducing impacts is clear in environmental law, the methodology of how to measure these impacts and evaluate their severity is not. The Scoping Letter requires an evaluation of the project potential to foster substantially increased economic or population growth, or the construction of additional housing in the surrounding area, either directly, indirectly, or cumulatively, based on the following questions:

- Are the road and bridge critical infrastructure in the chain of factors that support growth?
- What aspects of the project could remove obstacles to population growth?
- Would the project add an amenity that could accelerate growth in the vicinity?

These questions reflect the typical methodologies used to analyze growth-inducing impacts of a project, which include the following:

- *Addition of an essential resource*: a project provides a resource previously missing from the area (e.g., a water supply), and the availability of this resource would cause existing regional growth projections to be exceeded.
- *Extension of critical infrastructure*: a project extends infrastructure such as a sewer or a roadway into a previously undeveloped area, and the lack of the infrastructure had been the missing link in the chain of factors allowing growth.
- *Removal of an obstacle to growth*: a project would correct a problem that had hindered development in an area (e.g., flooding), and the removal of this obstacle would allow growth that would exceed regional growth projections.
- *Provision of a new amenity*: a project adds an amenity (e.g., a recreational lake), that could accelerate growth in the vicinity beyond planning expectations.

The growth-inducing potential of El Camino Road/Bridge Project is evaluated below using each of these methodologies.

4.3.1 Addition of an Essential Resource

An essential resource is an element so crucial to development that growth could not occur without it. Water generally constitutes an essential resource. When regional plans do not account for the presence of an essential resource, and that resource is provided by a new project, then the potential for growth inducement is created by the project.

The purpose of El Camino Real Bridge/Road Widening Project is to replace an existing bridge that is not seismically adequate, protect the road and bridge from 100-year flooding, and relieve existing traffic congestion that is currently at Level of Service F. Although these are very desirable public safety actions, the bridge and roadway do not constitute an essential resource such as water supply. Traffic continues to travel across the bridge and along the roadway, in spite of the seismic condition of the bridge piers, periodic flooding that occurs across the road, and the ongoing gridlock conditions during peak traffic hours. Therefore, the project would not be growth inducing in terms of adding an essential resource.

4.3.2 Extension of Critical Infrastructure

Transportation facilities, particularly those that include river crossings, can be considered critical infrastructure, because high quality residential or commercial development normally does not occur where access would not be possible due to frequent flooding. Other infrastructure that is important for a reasonable quality of life in an area includes water supply, flood control and drainage, sewage transmission and treatment, solid waste removal, and power. Therefore, transportation facilities constitute an important link in the chain of growth, but certainly not the only link.

El Camino Real Bridge/Road Widening Project would improve the seismic stability of an existing bridge, increase the capacity of an existing roadway, and improve the flood protection of the transportation system in the floodplain of the San Dieguito River. It would not extend the roadway to a new area, or create new transportation linkages. Also, the project would implement

the NCFUA Framework Plan, and not create any change in land use, or make possible growth which is not already planned for in the City's 2008 General Plan, or create pressure to amend the 2008 General Plan to accommodate such growth. Therefore, the project would not be growth inducing in terms of extending critical infrastructure.

4.3.3 Removal of an Obstacle to Growth

Lack of adequate road capacity is frequently an obstacle to growth. When the transportation inadequacies are corrected, the subsequent development can generate individual and cumulative impacts to the surrounding environment.

A number of developments approved in the regional area, and specifically the NCFUA of the City of San Diego, have been required to contribute funding to correct deficiencies in transportation facility capacity, including contributing to widening of El Camino Real and to the improvement of many other roadways. As defined at the beginning of this section, induced growth is any growth that <u>exceeds planned growth</u> and results from new developments that would not have taken place without the proposed project. The bridge replacement and road/bridge widening of the segment of El Camino Real from Via de la Valle to San Dieguito Road would not alter development plans already approved in the regional area. The growth inducement also would not substantially alter the planned pattern of land use, population density, or growth rate, and would not cause widespread permanent effects to air, water, and other natural systems. Therefore, the project's growth inducing impacts would not be significant under CEQA.

4.3.4 **Provision of a New Amenity**

When an entire region is considered, local amenities are minor factors in stimulating growth, compared to other factors such as employment, housing, climate, commercial services, and land use policies. Employment and the economy form the basis for SANDAG population projections throughout San Diego County. The presence of a new amenity, such as a recreational lake or park, would not be expected to change growth projections in a particular city or region, even if some local growth shifting were to occur.

Several alternatives for El Camino Real Bridge/Road Widening Project would provide bicycle lanes in the widened road cross section, and would accommodate an elevated platform for a multi-use trail undercrossing under the new bridge. However, these components would not be considered amenities that could stimulate population growth in the regional area. Also, the project would not stimulate unanticipated growth. The NCFUA Framework Plan calls for El Camino Real to be a 4-lane major road. Therefore, the project would not be growth inducing in terms of providing a new amenity.

4.4 CUMULATIVE EFFECTS

The City of San Diego Significance Determination Thresholds (City of San Diego 2011) cite State CEQA Guidelines Section 15355 in defining a cumulative impact as "an impact which is created as a result of the combination of the project evaluated in the Environmental Impact Report (EIR) together with other projects causing related impacts." The state CEQA Guidelines further state that "An EIR should not discuss impacts which do not result in part from the project evaluated in the EIR." The City thresholds also cite the following from the state CEQA Guidelines:

- "The individual effects may be changes resulting from a single project or a number of separate projects.
- The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time."

4.4.1 Methodology

The basic scope of projects used for the cumulative effects analysis consists of a list of development projects provided by the City. This list was supplemented with the proposed infrastructure and restoration projects discussed in Section 3.1 that were determined to be pending in the project area. Table 4-1 lists the projects used for cumulative analysis and Figure 4-1 graphically depicts the location of these projects.

For determining significance under CEQA of cumulative impacts, the City of San Diego Significance Determination Thresholds (City of San Diego 2011) offer the following general guidance:

- 1. If there are known documented existing significant impacts occurring in a community, additional increments would exacerbate the impact.
- 2. If a community plan and/or precise plan identifies cumulative impacts in the community wide EIR, individual projects which contribute significantly to the community wide impacts would be considered cumulatively significant.
- 3. A large scale project (usually regional in nature) for which direct impacts are mitigated by the collective number of individual impacts results in a cumulative impact.

4.4.2 Cumulative Effects Analysis

For each of the following issues, the geographic area used in the cumulative effects analysis is defined. For many issues, the PIF defined in Section 3.1: Land Use is the geographic area used. However, the geographic areas vary based on the environmental setting and the anticipated scope of each effect. When available, environmental documents for the identified projects were reviewed to determine the extent of direct and indirect project level effects in order to evaluate the potential for cumulative effects. However, for many of the reasonably foreseeable future projects, environmental documents were not yet available.

It should be noted that the general cumulative impacts under CEQA of the regional area developing in conformance with the North City Future Urbanizing Area Framework Plan were addressed in the EIR for the Framework Plan (City of San Diego 1992). Proposals in the urban reserve that were considered in the cumulative impact analysis included Black Mountain Ranch, Fairbanks Highlands, Pacific Ranch, and Stallions Crossing. The EIR concluded that implementation of the Framework Plan together with concurrent projects in the urban reserve, neighboring communities' plans, and the resultant population addition would be expected to contribute to continuation of the existing regional trends, including increased travel demand and degraded traffic operations particularly along the I-5 and I-15 corridors; increased presence of urban activities and associated visual impacts in formerly undeveloped open space; loss of

agricultural lands; regional degradation of air quality; and increased noise along transportation corridors that have experienced increased traffic flows. Since the Framework Plan EIR already examined cumulative impacts under CEQA of regional development, this EIR for El Camino Real Bridge/Road Widening Project focuses on nearby projects with the most likelihood to be constructed at the same time and add to direct cumulative effects in the project area.

Effects associated with each of the proposed El Camino Real Bridge/Road Widening Project alternatives and effects which could be considered cumulatively adverse when combined with other projects (depending on the alternative) include traffic, visual quality, land use, historical resources, hydrology/water quality, paleontological resources, and biological resources. The cumulative effect of each of these issues is discussed below. Effects related to farmlands, public services, geology, air quality, noise, and GHG emissions are considered to be not adverse and not significant under CEQA for all of the project alternatives. The proposed El Camino Real Bridge/Road Widening Project would not contribute to cumulative effects in these issue areas.

Project # ¹	Project	Description	ADT	Status ²
1	Flower Hill	Adding 8,754 square feet (sf) of retail; 2,300 sf	3,179	Approved
	Promenade	of storage; 28,927 sf of office; and 35,000 sf of		
		market.		
2	22nd District	Replace existing flat floor exhibit building (add	6,960	Approved
	Agricultural	26,220 sf); pave east parking lot; new 60,000 sf		
	Master Plan	health club; Solana gate improvement; rooftop		
3	Dlash Manutain	sports field; conference hotel.	> 20 222	Ammorrad
3	Black Mountain	The 3,690-acre BMR vesting tentative map (VTM) includes 2 golf courses; 1,212 dwelling	>20,222	Approved
	Ranch (BMR)	units; parks, schools, fire station, etc. An		
		additional 1,408 acres of new development are		
		included in BMR.		
4	Morgan Run	Health spa: 9,432 sf increase.	283	Approved
	Country Club		200	1 pproved
5	Palma de la	54 apartments; 19,500 sf office; and 9,500 sf	1,202	Approved
	Reina	retail.		
6	Rancho Santa Fe	Recreational 18-hole golf course.	700	Approved
	Farms Golf Club			
7	Pueblo de la	22 townhomes.	220	Pending
	Valle			
	(aka Vial de la			
	Valle			
8	Townhomes) Rancho del Mar	225 series housing units	900	Dandina
<u> </u>	One Paseo	225 senior housing units. 245,000 sf corporate office; 291,000 sf multi-	26,961	Pending Pending
7	One raseo	tenant office; 150-room hotel; 220,000 sf	20,901	renuing
		community shopping center; 10-screen cinema;		
		608 multi-family (MF) dwelling units (DU)		
10	Riverview	23,120 sf office	560	Approved
	Project		2.00	- PProved
11	Sillstrop Single-	3 apartments and 22 homes.	244	Approved
	family Homes	L		FF 112
12	Solana Beach	Office alternative 133,047 sf.	3,310	Pending
	Towne Center			-

Table 4-1List of Cumulative Projects

Project # ¹	Project	Description	ADT	Status ²
13	Solana Beach Mixed-Use Project	Mixed use.	630	Pending
14	NCTD Mixed- Use	Mixed use.	3,585	Pending
15	Stevens Avenue Office Building	18,905 sf offices.	380	Pending
16	Shepard Medical Center	Medical office: 4,394 sf.	220	Approved
17	Solana Gateway	Mixed use: Hotel, restaurant, residential	1,760	Pending
18	Helen Woodward Animal Center	Building expansion: 41,600 sf.	594	Approved
19	Del Mar Country Estates	Residential: 14 estate homes	168	Pending
20	Via de la Valle Bikeway	Class II and III temporary bikeway from San Andreas Drive to El Camino Real 1.1 miles long	None	Approved
21	Widening of Via de la Valle Western Segment	Widening of two-lane portion to four lanes, from existing four-lane portion at San Andreas Drive easterly to El Camino Real.	None	Pending
22	Sewer Pump Station 79	Demolish the existing sewer pump station, construct a new pump house and other improvements	None	Pending
23	JPA Restoration Plans	Convert fallow agricultural fields to wetlands	None	Pending
24	Harvest Evangelical Church	61,680 sf Church	Completed	Approved

Table 4-1 List of Cumulative Projects (continued)

¹ #7 and #15 location not displayed on Figure 4-1.

² Project status was reviewed and updated April 2014 with the exception of project 19, status unavailable.

4.4.2.1 Traffic/Circulation

Cumulative Effects. Overall, the set of urban development projects in Table 4-1 would contribute to an increase in traffic volumes on city streets. In particular, the Flower Hill Promenade project was found to result in a significant cumulative impact to the segment of Via de la Valle between San Andreas Drive and El Camino Real, with mitigation of contribution to planned improvements of Via de la Valle west of El Camino Real. Offsetting this trend are road widening projects such as the proposed project and widening Via de la Valle from El Camino Real to San Andreas Drive, which would route traffic more efficiently. Most of the alternatives for El Camino Real Bridge/Road Widening Project would reduce congestion and improve traffic flow, but full benefits would not be achieved for all road segments and intersections. In those cases, LOS and delay would be no worse than No Build conditions,. If any of the projects in the area are under construction at the same time as the El Camino Real Bridge/Road Widening Project, these projects would add cumulatively to the already congested existing traffic conditions if construction traffic occurred at peak hours or if construction activities closed travel lanes.

Significance of Cumulative Construction Traffic Impacts under CEQA for All Build Alternatives. In terms of short-term construction conditions, the build alternatives would add minimal traffic during peak hours, and all alternatives would maintain two lanes for traffic. Since essentially the same conditions would be provided for traffic during construction as under existing conditions, impacts of the proposed project alternatives on LOS were determined to be not significant for any of the build alternatives. Assuming other nearby construction projects, if they occurred at the same time, would also implement effective traffic controls, would not close travel lanes, and would avoid peak hour travel times for construction related vehicles, cumulative traffic impacts of construction would not be significant.

Significance of Cumulative Operational Traffic Impacts under CEQA for the Full Roadway Width Alternatives. In its current condition, this portion of El Camino Real operates at LOS F and does not provide a favorable user environment for other modes of travel. For the Central Alignment, Western Alignment, and Lower Elevation alternatives, the long-term intersection operation at Via de la Valle and El Camino Real would be LOS F in the A.M. and P.M. peak. This long-term intersection LOS is the same as the No Build LOS, and the delay is not as long as for the No Build Alternative. Not improving the level of service is not a significant impact of the project. For the Central Alignment, Western Alignment, and Lower Elevation alternatives, the long-term intersection operation in 2035 could be improved above No Build LOS F conditions by providing four lanes on the intersection approach for traffic movements (a left-turn, two through lanes, and a dedicated right-turn lane) for eastbound traffic on Via de la Valle on the west side of El Camino Real. However, that configuration is not being proposed for these alternatives because land use impacts would occur to Mary's Tack and Feed. Not improving the level of service is not a significant project impact; therefore, these alternatives would not create a significant cumulative traffic impact under CEQA when combined with cumulative projects in the area.

The Eastern Alignment Alternative would have an improved intersection LOS at Via de la Valle and El Camino Real, because four lanes on the intersection approach for traffic movements (a left-turn, two through lanes, and a dedicated right-turn lane) for eastbound traffic on Via de la Valle on the west side of El Camino Real would be provided without impacting Mary's Tack and Feed. Long-term operation at the new intersection of El Camino Real and Via de la Valle/De la Valle Place for the Eastern Alignment would be LOS D in the A.M. and P.M. peak. Therefore, the Eastern Alignment would not create significant project or cumulative traffic impacts under CEQA at this intersection.

The Roundabout Alternative would operate at unacceptable LOS E and F in the A.M. and P.M. peak, respectively, at El Camino Real and Via de la Valle in 2035. This long-term intersection LOS is no worse than the No Build LOS. Not improving the level of service is not a significant impact of the project. An expanded design for the Roundabout Alternative at El Camino Real and Via de la Valle would be needed to improve long-term 2035 operations at this location. The expanded design is designated in the roundabout study as the "ultimate" design for this roundabout and would add a second southbound lane and a northbound dual right turn partial bypass, which would improve the operations of this roundabout to LOS A for A.M. and P.M. peaks. The City is not proposing the ultimate roundabout design for the Roundabout Alternative at this location in order to minimize the footprint of this alternative. Not improving the level of service is not a significant project impact; therefore, the Roundabout Alternative would not create a significant cumulative traffic impact under CEQA when combined with cumulative projects in the area.

For all build alternatives, the full width configuration would be constructed but full benefit could not be achieved at the intersection of Via de la Valle and El Camino Real North without widening of Via de la Valle for a transition for four lanes to two lanes east of El Camino Real North. Although the full width configuration would be constructed up to El Camino Real North, the striping for a full width intersection would not be provided because that would require construction of a transition that would extend beyond the project area and into County of San Diego jurisdiction. Not improving the level of service beyond No Build conditions is not a significant project impact; therefore, the build alternatives would not create a significant cumulative traffic impact under CEQA when combined with cumulative projects in the area.

Significance of Cumulative Operational Traffic Impacts under CEQA for the Road Capacity and Bicycle Safety Alternatives. The Road Capacity and Bicycle Safety alternatives would result in significant and unmitigable traffic/circulation impacts under CEQA for having non-standard design that would create additional hazards for pedestrians (both alternatives), create additional hazards for bicyclists (Road Capacity Alternative), and substantially restrict access to Mary's Tack and Feed, a privately owned business, and Horsepark and Polo Club, publicly owned properties (Road Capacity Alternative). These traffic impacts would be cumulatively significant because the non-standard design features would exacerbate hazards for pedestrians and bicyclists and the lack of turn pockets for the Road Capacity Alternative would continue to restrict access as other cumulative development projects incrementally add traffic and multimodal travelers to the area.

The long-term operation of the El Camino Real road segments for the Road Capacity and Bicycle Safety alternatives would be LOS F, which is no better than No Build LOS in 2035. Not improving the level of service is not a significant impact of the project. Therefore, these alternatives would not create a significant cumulative traffic impact under CEQA when combined with cumulative projects in the area.

4.4.2.2 Visual Quality

Cumulative Effects. The area that can see the road and bridge (as defined in Section 3.3) would define the geographic scope for analysis of cumulative visual quality effects. The other identified cumulative projects within or immediately adjacent to this area will substantially alter the views of the area and will add to the cumulative change in visual quality by creating urban development, including wider roadways. Overall, the development projects evaluated would create views of urban development, including buildings, paving, and more visible structures, in the San Dieguito River Valley. Counteracting the urbanization of the river valley is the acquisition of more than 600 acres of land previously zoned for development to be dedicated to open space, including the area of the completed San Dieguito Lagoon Wetlands Restoration Project and the former Boudreau property purchased by the JPA west of El Camino Real that is being planned for restoration.

Significance under CEQA for All Build Alternatives. All of the build alternatives would cause significant impacts from degradation of visual character, blocking a view corridor, and blocking a view of a public resource. The retaining walls of the Road Capacity Alternative and Bicycle Safety Alternative would also generate significant impacts. Most of the visual impacts would be mitigable to below a level of significance, so would not generate significant cumulative impacts under CEQA. However, blocking the view corridor and view of a public resource due to the cantilever fence on the west edge of the new bridges was determined to be unmitigable under CEQA. Therefore, this feature of the build alternatives would contribute to visual/aesthetics cumulative impacts.

4.4.2.3 Land Use

Cumulative Effects. As stated in the City's Significance Determination Thresholds for land use, projects that are consistent and compatible with surrounding land uses and the applicable community plan should not result in direct or cumulative land use impacts. Development of cumulative projects, including infrastructure, would be evaluated for land use compatibility as each project is processed. The project involves replacement of an existing bridge and reconstruction of an existing roadway in the City. As described in Section 4.1, Land Use, the project is an essential public facility and would be consistent with applicable policies and is an allowed use according to the Multiple Species Conservation Program (MSCP).

Significance under CEQA for All Build Alternatives. Although no direct impacts related to land use were identified, all of the build alternatives would require implementation of the mitigation measures for work in or near the MHPA. Indirect impacts to the adjacent MHPA require implementation of mitigation consistent with the City's MHPA Land Use Adjacency Guidelines. The impact-avoiding measures are similar to what would be proposed for mitigation for other projects in or near the MHPA to reduce impacts to less than significant. Therefore, the proposed El Camino Real Bridge/Road Widening Project is not expected to result in a cumulatively significant land use impact.

4.4.2.4 Historical Resources

Cumulative Effects. The Area of Potential Effect (APE) would define the geographic scope for analysis of cumulative historical resources effects. Cultural resources, prehistoric and historic, have been previously identified within the regional area. Mitigation that would reduce historical resources effects associated with cumulative projects has been or will be required as part of the environmental review process. While there are no identified potentially eligible historical resources within the project APE, there is a potential for buried archaeological resources that, if present, could be disturbed by excavation. Overall, the development and infrastructure projects evaluated indicate a trend toward disturbance of land for urban development, which leads to loss and degradation of any historical resources not previously disturbed. Counteracting the urbanization of the river valley is the acquisition of more than 600 acres of land previously zoned for development to be dedicated to open space, as noted above. To the extent that land is preserved undisturbed, historical resources would be protected. If wetlands or other habitat areas are created in the open space areas, however, disturbance of historical resources, if present, could occur.

Significance under CEQA for All Build Alternatives. Although no direct impacts under CEQA were identified for the build alternatives, monitoring during construction has been recommended to avoid impacts due to the potential for buried resources. These specific measures are similar to what would be proposed for mitigation for other projects in the vicinity. The proposed El Camino Real Bridge/Road Widening Project is not expected to result in the cumulative loss of historical resources, so a cumulatively significant impact to historical resources under CEQA would not occur.

4.4.2.5 Hydrology/Water Quality

Cumulative Effects. The San Dieguito River watershed downstream of Hodges Dam defines the geographic scope for analysis of cumulative effects on water resources in terms of hydrology (volume and rate of flood flows and local runoff), hydraulics (water surface elevations and velocities generated as water flows through drainages and in the river valley), and water quality.

As part of this EIR, hydrology and hydraulic studies were conducted on the relevant segment of the San Dieguito River to update 100-year flow rates and the corresponding 100-year floodplain utilizing current topography. Water resource issues related to the floodplain and flood patterns, flood flow rates, groundwater quantity and infiltration, operational water quality, and water quality during construction are evaluated in Section 3.7. Development of the cumulative projects could result in short-term degradation of water quality during construction within the San Dieguito River watershed. In particular, the San Dieguito Lagoon Wetlands Restoration Project involved considerable earthwork in the watershed downstream of the El Camino Real Bridge/Road Widening Project. The lagoon project is completed so there would be no overlap of construction of these two projects. However, a subsequent restoration project being jointly planned by SANDAG and JPA for the JPA property that includes the proposed mitigation concept for the El Camino Real Bridge/Road Widening Project. During construction, all projects are required to incorporate best management practices to avoid water quality impacts to their downstream watersheds.

After completion of all cumulative projects, the increased urbanization and paving associated with the development projects would cumulatively increase runoff and potential degradation of water quality over the long term. In contrast, completion of the lagoon wetlands restoration project, the JPA/SANDAG restoration project, and the proposed wetlands mitigation concept for the El Camino Real Bridge/Road Widening Project on existing fallow farmland would increase the area of functional wetlands in the watershed, enhancing water quality in the long-term by increasing the area of plants that can provide natural removal of pollutants.

All of the build alternatives involve raising El Camino Real on fill across the 100-year floodplain. Water surface elevations during the 100-year flood would not be higher with the project because the slopes under the bridge abutments would be steepened from approximately 2:1 to 1.5:1, thereby incrementally increasing river capacity enough to offset the effective flow that would flow over the road near Horsepark in existing conditions. Velocities in the 100-year flood would increase upstream of the proposed bridge, necessitating bank stabilization along the currently unprotected north bank of the river for approximately 500 feet upstream of the new bridge as mitigation. This mitigation would be accomplished by installing buried stabilization materials behind the river bank slope without affecting wetlands in the river channel and on the banks (see Figure 3.7-5). The Central Alignment Alternative and Lower Elevation Alternative would affect the drainage ditch parallel to El Camino Real, so would re-create the ditch immediately to the east, and the new ditch would be vegetated appropriately. Other build alternatives would minimize impacts to this drainage ditch. The drainage ditch parallel to Via de la Valle would be replaced with a buried low flow storm drain, and appropriate wetlands mitigation would be provided on the JPA Mitigation Site west of El Camino Real. For all build alternatives, bio swales or other approved permanent BMPs would be incorporated into the project for treatment of runoff from the widened roadways along Via de la Valle and El Camino Real.

Significance under CEQA for All Build Alternatives. Other projects that could impact water quality during construction or after completion, including Rancho Del Mar on the property south of Via de la Valle and north of the Polo fields, would be expected to implement similar water quality control measures (e.g., best management practices) as required for El Camino Real Bridge/Road Widening Project, in order to reduce project-specific impacts to below a level of significance.

The El Camino Real Bridge/Road Widening Project would not increase upstream 100-year water surface elevations. The Rancho Del Mar project is within the 100-year floodplain of the San Dieguito River but is being planned to avoid any increases in upstream 100-year water surface elevations. This impact would not be cumulatively significant.

The El Camino Real Bridge/Road Widening Project would increase 100-year velocities in the San Dieguito River and proposes mitigation for this issue. No other cumulative project would increase 100-year velocities in the river, so this project-specific impact would not be cumulative.

4.4.2.6 Paleontological Resources

Cumulative Effects. Fossil-bearing formations within San Diego define the geographic scope for the analysis of cumulative paleontological effects. Development of cumulative development, infrastructure, and restoration projects could result in grading of fossil-bearing formations and concomitant loss of important paleontological resources within the region. The incremental impacts of projects affecting paleontological resources would result in environmental consequences that would add cumulatively to similar effects of the proposed El Camino Real Bridge/Road Widening Project.

Significance under CEQA for All Build Alternatives. Project-level impacts to paleontological resources during construction would be significant under CEQA for each of the build alternatives. However, mitigation measures have been provided that would reduce the project impacts to below a level of significance under CEQA. Therefore, the project alternatives would not contribute to significant cumulative paleontological impacts under CEQA.

4.4.2.7 Biological Resources

Cumulative Effects. The regional area encompassed by the projects in Table 4-1 defines the geographic scope for the analysis of cumulative effects on biological resources. Project-level biological issues related to sensitive habitats, sensitive plant and wildlife species, wildlife movement, and MHPA areas have been addressed in this EIR. The cumulative projects identified for this analysis would result in environmental consequences to biological resources, including wetland vegetation communities, within the area when added to the effects of the proposed El Camino Real Bridge/Road Widening Project. Overall, the development and infrastructure projects evaluated could result in loss of biological resources to urban development, with appropriate levels of mitigation provided. Counteracting the urbanization of the river valley is the acquisition of more than 600 acres of land previously zoned for development to be dedicated to open space, as noted above. Completion of the lagoon wetlands restoration project, the restoration planned by JPA and SANDAG, and the proposed wetlands mitigation concept for the El Camino Real Bridge/Road Widening Project on existing fallow farmland owned by the JPA would increase the area of functional wetlands in the watershed.

Significance under CEQA for All Build Alternatives. For all of the proposed project build alternatives, direct impacts to disturbed Diegan coastal sage scrub and sensitive wetlands, and potential indirect impacts to sensitive wildlife species were identified as significant but mitigable under CEQA at the project level. Implementation of any of the project alternatives would result in the temporary loss of wetlands during the construction phase, due to effects of bridge building. However, these effects would result in minimal permanent effects, because the new bridge piers would take up less area in the river than the existing piers, although shading is also counted as a permanent impact. Mitigation to reduce biological resources impacts to below a level of significance under CEQA has been required. It should be noted that the Roundabout Alternative

would require additional acreage of wetland mitigation beyond the JPA Mitigation Site. Additional suitable mitigation opportunities exist within the project vicinity; therefore, additional off-site mitigation would be achievable for the Roundabout Alternative on a site owned by the City. Cumulative impacts for all of the biological resources evaluated in Section 3.12 of this recirculated EIR are discussed below.

Implementation of the proposed project and cumulative projects in the vicinity of the project site would not result in adverse cumulative impacts to the wetland vegetation communities of southern willow scrub, mule fat scrub, coastal freshwater marsh, disturbed coastal freshwater marsh, disturbed coastal salt marsh, or disturbed wetland. The project itself would not result in impacts to coastal brackish marsh. Federal, state, and local policies require that projects have no net loss of riparian vegetation communities, including those impacted by the build alternatives. Furthermore, all build alternatives for the proposed project will mitigate impacts to sensitive vegetation communities at appropriate mitigation ratios finalized in consultation with the permitting agencies. Other projects that could contribute to cumulative impacts to sensitive vegetation communities in the project area will also be required to comply with policies for wetland creation and mitigation at appropriate acreage ratios.

Implementation of the proposed project and cumulative projects in the vicinity of the project site would not result in adverse cumulative impacts to disturbed Diegan coastal sage scrub. Project conformance with the City of San Diego MSCP guidelines (City of San Diego 1997) and conditions of coverage ensures that no cumulative impacts to biological resources will occur as a result of the proposed project. The MSCP facilitates coordinated regional conservation of biological resources and mitigation for impacts within the City boundaries.

Implementation of the proposed project and cumulative projects in the vicinity of the project site would not result in adverse cumulative impacts to sensitive plants. Various build alternatives of the proposed project would result in impacts to individuals of the following sensitive plants: Palmer's sagewort, San Diego sunflower, , San Diego marsh-elder, and southwestern spiny rush. However, such impacts were not determined to be significant because the losses would not threaten the long-term survival of these species in the region or within the MSCP subarea. Therefore, the minimal losses of the plant individuals would not substantially contribute to potential adverse cumulative impacts to these plants in the project area. Furthermore, mitigation activities on the JPA Mitigation Site will consist of habitat enhancement, and thus, will not result in impacts to San Diego marsh-elder or other native plant species. In addition, habitat-based mitigation will be offered for impacts to disturbed Diegan coastal sage scrub supporting San Diego sunflower, and habitat-based mitigation will be offered for impacts to supporting southwestern spiny rush.

Implementation of the proposed project and cumulative projects in the vicinity of the project site will not result in adverse cumulative impacts to sensitive wildlife. Direct impacts to sensitive avian species from the proposed project are not anticipated because construction activity in the river and mitigation site will avoid the nesting season (February 1 through September 30), of all sensitive bird species, and specific measures will be taken to protect non-migratory light-footed clapper rail.. However, various build alternatives of the proposed project would result in impacts to habitats that support the following sensitive wildlife: northern harrier, Clark's marsh wren, yellow warbler, white-tailed kite, yellow-breasted chat, light-footed clapper rail, and least Bell's vireo. These impacts could result in indirect impacts to sensitive wildlife. But the temporary loss of suitable habitat would be offset by creation of habitats within the JPA Mitigation Site that will also provide suitable nesting and/or foraging habitat for northern harrier, Clark's marsh wren,

yellow warbler, white-tailed kite, yellow-breasted chat, light-footed clapper rail, and least Bell's vireo.

Other projects planned in the vicinity of the El Camino Real Bridge/Road Widening Project area would also have breeding season restrictions and be required to conform to MSCP. Of those identified in the project vicinity, only one project in close proximity involves restoration, enhancement, and creation of wetland habitats. It is likely that seasonal restrictions on construction activities also will apply to that project in order to minimize indirect noise impacts and avoid disruption of the normal activities of the clapper rail and other wildlife species utilizing the San Dieguito River as a wildlife corridor.

4.4.3 No Build Alternative

The No Build alternative would retain the existing two-lane El Camino Real configuration and would not replace the bridge over the San Dieguito River. Since this alternative would not result in any physical changes to the environment, it would not contribute to cumulative effects associated with construction of the identified cumulative projects.

4.4.4 Significant and Unmitigable Cumulative Impacts under CEQA

In October 2002, the California Court of Appeal for the Third District issued a decision in the case *Communities for a Better Environment v. California Resources Agency*, Case No. CO38844 (10/28/02). Among other decisions, the court found that "A lead agency may determine that a project's incremental contribution to a cumulative effect is not cumulatively considerable if the project will comply with the requirements in a previously approved plan or mitigation program which provides specific requirements that will avoid or substantially lessen the cumulative problem. . . . " Therefore, the impacts that are found to be significant and unmitigable (or are chosen to not be mitigated) are those that would contribute to cumulative impacts under CEQA.

For the proposed El Camino Real Bridge/Road Widening Project, significant and unmitigable impacts under CEQA that consequently contribute to cumulative impacts are summarized in Table 4-2.

Mitigation measures to reduce these impacts have not been identified. Therefore, the proposed project would contribute significantly to cumulative impacts related to the traffic/circulation access and hazards impacts for the Road Capacity Alternative and the Bicycle Safety Alternative, and the visual/aesthetics impact due to the cantilever fence for all build alternatives.

The alternative that minimizes contribution to cumulative impacts and achieves the greatest improvement in long-term traffic conditions is the Eastern Alignment Alternative, which reduces congestion at the most intersections and only generates the significant and unmitigable visual impact due to the cantilever fence that is common to all build alternatives.

4.5 EFFECTS NOT FOUND TO BE SIGNIFICANT UNDER CEQA

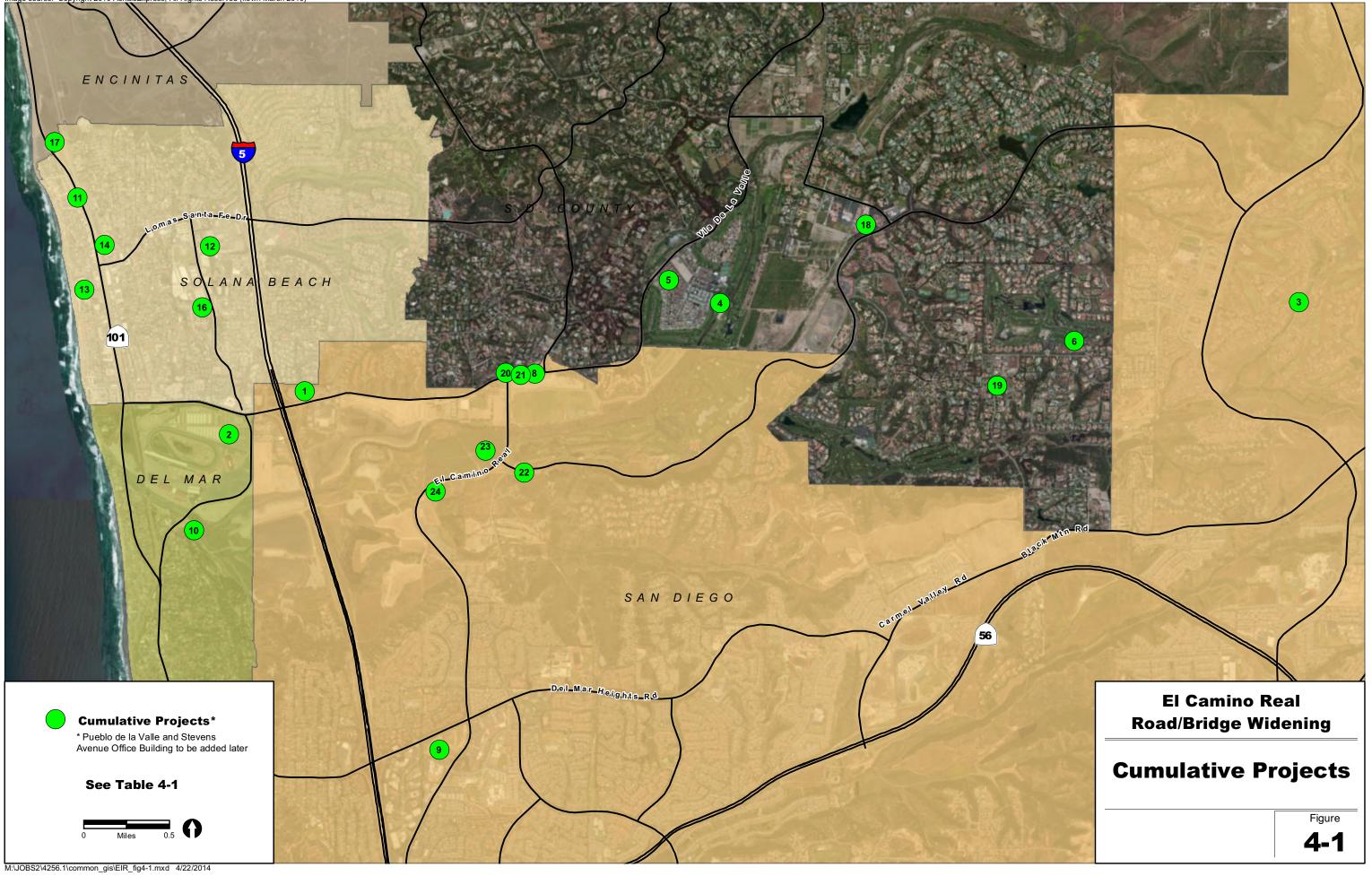
CEQA Guidelines Section 15128 requires an EIR to contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR. The EIR for El Camino Real Bridge/Road Widening Project did not dismiss any technical issue; all possible effects of the project were analyzed in detail in Section 3. After analysis presented in Section 3, impacts in the following issue areas were found to be not significant under CEQA for all of the build alternatives:

farmlands, public utilities/services, geology/seismicity/soils, air quality, noise, and greenhouse gas emissions. Refer to the sections in Section 3 that address these issues for the documentation of the conclusions regarding non-significance under CEQA.

Alternative	Traffic/Circulation	Visual/Aesthetics
Central Alignment	N/A	- Blocking the view corridor and view of a public resource
Western Alignment		due to the cantilever fence on
Lower Elevation		the west edge of the new bridge
Eastern Alignment		
Roundabout		
Road Capacity	 Restrictions in access to commercial and recreational facilities along El Camino Real. Increase in hazards to pedestrians and bicyclists due to no pedestrian walkways or bicycle lanes. 	- Blocking the view corridor and view of a public resource due to the cantilever fence on the west edge of the new bridge
Bicycle Safety	- Increase in hazards to pedestrians due to no pedestrian walkways.	- Blocking the view corridor and view of a public resource due to the cantilever fence on the west edge of the new bridge

 Table 4-2

 Significant Unmitigable Impacts Contributing to Cumulative Impacts



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SECTION 5 ALTERNATIVES

Section 15126.6 of the California Environmental Quality Act (CEQA) Guidelines requires that an EIR "shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible."

The goals and objectives for the project are discussed in Section 1.2 of the recirculated EIR and are listed below:

- 1) To provide structurally sound and operationally efficient access across the San Dieguito River during flood and non-flood events
- 2) To provide congestion relief in order to improve traffic flow
- 3) To obtain improved consistency with the adopted land use plans in the project area
- 4) To improve pedestrian and vehicular access to nearby coastal and recreational resources

Section 5.1 of the EIR describes alternatives to the project that were initially examined but determined to not meet most of the basic objectives of the project, and/or not avoid or substantially lessen significant impacts of the project without detailed analysis. These alternatives are grouped as "Alternatives Considered but Rejected." The No Build Alternative is discussed in Section 5.2. The seven alternatives that represent the reasonable range of feasible alternatives were evaluated in detail in Section 3 of the EIR, and are compared in Section 5.3 to identify the Environmentally Superior Alternative. The City's rationale for selecting their Preferred Alternative is presented in Section 5.4.

5.1 ALTERNATIVES CONSIDERED BUT REJECTED

5.1.1 Traffic Diversion

One alternative location could involve diverting traffic around this segment of El Camino Real so that the road capacity increase would not be necessary (Figure 5-1). Since there are no through north-south roadways between I-5 and El Camino Real, high volume traffic would have to be routed to the east. The nearest roadway that links Via de la Valle and San Dieguito Road is El Apajo in Fairbanks Ranch, a two-lane road that terminates on either side of the San Dieguito River in Morgan Run Resort and Club (Figure 5-1). There is no bridge over the San Dieguito River on El Apajo. West of Via de Santa Fe, El Apajo narrows to a dirt road and terminates at the river. Via de Santa Fe, a two-lane road, runs north from El Apajo east of the resort near Fairbanks Country Day High School, crosses the river on a bridge, and intersects with Calzada del Bosque approximately 2,185 feet to the north. Calzada del Bosque, a two-lane road, intersects with Via de la Valle approximately 2,850 feet to the west. This alternative would represent an approximately 7-mile detour for through traffic on El Apajo were completed via

construction of a new four-lane bridge over the San Dieguito River, the detour would be reduced by approximately 1.3 miles for a total diversion of 5.7 miles and require widening of El Apajo and Via de la Valle.

This traffic diversion alternative location would create new impacts to the San Dieguito River in a different location, increase traffic and noise along narrow roadways, and generate inconsistencies with the North City Future Urbanizing Area Framework Plan (City of San Diego 1995). This alternative would not address most of the purposes of the proposed project because it would not improve the bridge to be a structurally sound and operationally efficient access across the San Dieguito River, would not help achieve the goals of the SANDAG Regional Transportation Plan, would not provide congestion relief, would not improve consistency with applicable land use documents, and would not improve pedestrian and vehicular access to nearby coastal and recreational resources.

Furthermore, since the diversion is so long it would not be perceived as convenient to drivers; therefore it likely would not be used enough to improve traffic conditions on El Camino Real. New environmental impacts would be generated for little or no benefit. This alternative was withdrawn from consideration because it would not substantially reduce environmental impacts and would not address most of the purposes of the project.

5.1.2 Alignment to El Camino Real North

A second alternative location would involve placing a wider roadway and new bridge east of existing El Camino Real, to line up with El Camino Real North, located 1200 feet east of the intersection with Via de la Valle (Figure 5-1). This concept would generate additional wetlands impacts in the San Dieguito River because the bridge would be longer and farther to the east than any of the other alternatives. This alternative would move the major intersection of El Camino Real and Via de la Valle to be at El Camino Real North and Via de la Valle, and necessitate raising the intersection and part of the road to the north which is inundated in the 100-year flood. Federal funding would not be provided for a road facility that is inundated by the 100-year flood. These changes would increase impacts to wetlands along the north edge of Via de la Valle and expand the construction zone northward on El Camino Real North. This alternative was withdrawn from consideration because it would not substantially reduce environmental impacts, and in particular would increase wetlands impacts.

5.1.3 Bridge over 100-year Floodplain

This alternative would involve a very long bridge (a "viaduct") that would span the entire 100year floodplain in the study area, which would constitute a vertical alternative location. Based on hydraulic studies conducted for the project, approximately 2,500 feet of El Camino Real between Via de la Valle and San Dieguito Road are in the 100-year floodplain. A bridge this long would be needed to span the entire floodplain. However, based on conceptual engineering design presented in Figures 5-2 and 5-3, a bridge spanning the entire floodplain could not meet the existing grade at Via de la Valle. This is because the bottom of the bridge must be above the 100year flood level (approximately 21 feet msl in this location) and the bridge would have a thickness of approximately 5 feet (see Figure 5-3). Therefore the surface of the bridge would be at an elevation of about 26 feet msl where it would meet Via de la Valle, but the existing elevation at this point is less than 25 feet msl. A bridge spanning the entire floodplain is not technically feasible. To create a functional viaduct alternative, the bridge portion was reduced to 1,700 feet long, and the remaining portion of the alternative would be on fill with 2:1 side slopes. For this segment of the alternative, only the road surface would have to be above the 100-year flood level, and the road could meet existing grade on Via de la Valle. This is the concept illustrated in Figures 5-2 and 5-3. For this concept, the driveways at Horsepark and the existing Polo Club fields would need to be built as raised structures, instead of on fill. The bridge would have 14 piers (columns) and two abutments. Raising the road on a viaduct would maintain existing flood flow patterns, in which flow that is not contained in the river channel spreads over Polo Fields, El Camino Real, and into Horsepark.

The cost of the bridge portion of the viaduct alternative was estimated by the project bridge engineers based on a previous bid for a similar bridge and experience with current construction cost trends. A bridge cost of \$300 per square foot of bridge surface area was determined to provide a reasonable estimate. The bridge portion of this alternative could be expected to have a construction cost of approximately \$50 million. This cost would not include the cost of driveways to affected properties, or construction of the roadway portion on embankment. According to CEQA Guidelines Section 15126.6(f), the factors that may be taken into account when addressing the feasibility of alternatives include economic viability. Since other project alternatives that meet objectives could be constructed for an estimated cost of approximately \$20 million, the viaduct was judged to be economically infeasible and was withdrawn from consideration.

5.1.4 River Channel Widening

During preliminary design in 1999, an alternative designated the "Wider Channel Alternative" was developed to avoid predicted increases in upstream 100-year water surface elevations caused by raising El Camino Real on embankment across the floodplain. Subsequent to completion of the preliminary design alternatives development and evaluation, legal research into federal and local floodplain regulations was conducted. In addition, updated hydraulic modeling was conducted with more recent topography.

Many federal and local regulations prohibit modifying a floodplain if 100-year flood levels would be increased. These regulations are presented in detail in Chapter 3.7.1. For example, Executive Order 11988 (Floodplain Management) directs federal agencies to avoid the long-and short-term adverse impacts associated with occupancy and modification of floodplains. Code of Federal Regulations Title 44: Emergency Management and Assistance prohibits encroachments, including fill, unless the action would not increase 100-year (base flood) water surface elevations. A number of provisions of the San Diego Municipal Code prohibit fill for permanent structures, roads, and other development from causing adverse impacts related to flooding of properties upstream or downstream, and specifically prohibit causing an increase in base flood levels (see also the analysis of consistency with the Environmentally Sensitive Lands portion of the City of San Diego Municipal Code in Chapter 3.1.3.5). However, these restrictions apply to an area where the floodplain and the floodway have been formally established. This is not the case for the study area, where this part of the San Dieguito River is in an "approximate," or Zone A as designated by the Federal Emergency Management Agency (FEMA). A rise in 100-year water surface elevations of less than 0.3 m (1 foot) would be legally permissible, provided formal permitting is filed with FEMA to establish new floodway mapping.

Based on this regulatory investigation, it was determined that a small net rise created by raising El Camino Real on embankment would be acceptable. Hydraulic modeling was conducted that incorporated the raised topography along the south bank of the San Dieguito River installed as

part of the Fairbanks Ranch Country Club golf course expansion. This hydraulic modeling indicated that without any compensatory river widening, the road fill across the floodplain (with existing conditions modeled with the golf course as an impenetrable encroachment to river overflow on the south), would increase upstream 100-year water surface elevations by 0.06 m (0.2 foot).

At the same time, detailed hydraulics analysis that focused on steepening the abutments under the bridge was conducted with topography that reflected 2004 conditions in the watershed. This modeling determined that the extensive river widening and bridge lengthening proposed for the Wider Channel Alternative in 1999 would not be necessary to achieve no net rise in 100-year water surface elevation. In addition, a study of potential impacts of extensive river widening on the river system in terms of water surface elevations, sediment transport, and groundwater was conducted. The potential impacts of extensive river widening were discussed with the permitting agencies at an Agency Coordination meeting on September 7, 2004. Minutes of this meeting are presented in Appendix C. Based on the determination that extensive river widening would not be needed to avoid increasing upstream 100-year water surface elevations, and given the potential for extensive river widening to reduce long-term beach sand supply and affect clapper rail habitat upstream of El Camino Real bridge, the agencies agreed that extensive river widening could be eliminated as a feature of alternatives addressed in detail in this EIR and EA. At this meeting, the Wider Channel Alternative was eliminated from detailed consideration. It was agreed that the further refinement of alternatives for detailed study in the EIR and EA would focus on the location of the road and bridge alignment, and that all alternatives would involve raising the road on embankment to protect it from the 100-year flood.

5.1.5 Task Force Alternatives

In September 2006, a community task force was formed to discuss roadway widening alternatives other than those evaluated in the 2006 EIR. The work of the Western San Dieguito River Valley/NCFUA Subarea II Task Force was documented in their Final Recommendations report (Task Force Report) dated February 7, 2007.

The Task Force studied a number of widening alternatives that they rejected in their own deliberations. The alternatives the Task Force considered but rejected are described in the Task Force Report and highlighted below. These alternatives are similarly considered but rejected in this recirculated EIR.

- Roundabouts at the Intersections: The Task Force examined information provided by City traffic engineers for roundabouts at the key intersections of Via de la Valle and El Camino Real, and San Dieguito Road and El Camino Real, and agreed that roundabouts at these intersections are not feasible. The Task Force Report noted that to accommodate the projected traffic in 2030, "the roundabouts would have to be four-lane in size with double right-turn lanes, which would require more space than a traditional four-lane intersection and would not be safe for bicycles."
- Three-Lane Versus Four-Lane Intersections: The Task Force initially considered restricting intersection improvements to a total of three lanes, with no right-turn-only lanes from Via de la Valle eastward onto El Camino Real southward and from El Camino Real northward to San Dieguito Road eastward. The Task Force Report noted that the improved traffic flow gained by four-lane intersections would be necessary to offset the loss of travel lanes proposed in other Task Force alternatives.

El Camino Real Central Alignment from San Dieguito Road to Via de la Valle: This Task Force alternative would mimic the Central Alignment Alternative in the 2006 EIR but with fewer travel lanes. However, the Task Force decided that the alignment of the Eastern Alignment Alternative would "provide a more logical intersection at an existing road, with fewer space constraints for intersection widening."

The Task Force Report recommended several design alternatives and features for consideration by the City. Task Force alternatives that extend west of El Camino Real along Via de la Valle or south of San Dieguito Road along El Camino Real are not discussed in this recirculated EIR, as they are not within the project area. Alternatives and features that are relevant to the project area are summarized below.

- El Camino Real from Via de la Valle to San Dieguito Road: The Task Force proposed a 54-foot-wide paved roadway cross section that would consist of two 14-foot-wide travel lanes, a 14-foot-wide emergency vehicle center lane, and 6-foot-wide bicycle lanes, plus parkways. A similar cross section was proposed by the Task Force for the bridge, with 5to 10-foot-wide sidewalks, for a total width of 60 to 70 feet, along with a trail cantilever on the west side of the bridge. The road cross section was proposed to be in the location of the Eastern Alignment Alternative, but the bridge was proposed to be in the same location as the existing bridge. The Task Force alternative was found to not require detailed analysis in this EIR because the proposed road cross section and bridge location would be essentially the same as the Bicycle Safety Alternative. The road cross section was found to not improve traffic operational conditions to the level needed to satisfy the project purpose and need because only two travel lanes would be provided, similar to the Bicycle Safety Alternative as discussed in Section 3.2.3.2 of the 2006 EIR and this recirculated EIR. In addition, the proposed alignment for the bridge would make the Task Force Alternative bridge extremely difficult to construct, as discussed for the Bicycle Safety Alternative in Section 3.2.3.1 of the 2006 EIR and this recirculated EIR. Therefore, the Task Force Alternative was considered but rejected by the City for this recirculated EIR.
- Construct new four-lane intersections at Via de la Valle and El Camino Real (at De la Valle Place) and at El Camino Real and San Dieguito Road: This feature is the same as the proposed location and configuration for the Eastern Alignment Alternative in the 2006 EIR and this recirculated EIR. Therefore, this feature has been studied in the EIR.
- Improve access to the Horsepark and Polo Field properties and the adjacent commercial uses via a new frontage road utilizing the existing El Camino Real alignment as proposed in the El Camino Real Draft EIR: The frontage road proposed is associated with the Eastern Alignment Alternative in the 2006 EIR and this recirculated EIR. Therefore, this feature has been studied in the EIR.
- Trails [relevant to the project area]: Provide an undercrossing under the new El Camino Real bridge, provide trail ramps from the bridge to access the Coast to Crest Trail, and provide pedestrian and equestrian pathways within landscaped parkways: An undercrossing under the new El Camino Real bridge with sufficient clearance for equestrians would be provided for all alternatives except the Lower Elevation Alternative. The undercrossing would be under the north side of the bridge, so would connect to the trail on the north side of the San Dieguito River. None of the alternatives would provide an elevated undercrossing under the southern end of the bridge, but the San Dieguito River ParkJPA would not be prevented from constructing an undercrossing

there if that location were chosen for the Coast to Crest Trail, as discussed in Section 3.1.3.4 of the 2006 EIR and this recirculated EIR. Pedestrian pathways would be included in all build alternatives except the Road Capacity Alternative and Bicycle Safety Alternative. The parkway for all but these two alternatives would have a width of 22 feet to allow placement of trails and landscaping as determined during final design. Therefore, these features have been studied in the EIR.

5.2 NO BUILD ALTERNATIVE

As defined in Section 15126.6(e)(3) of the CEQA Guidelines, El Camino Real Bridge/Road Widening Project is the type of project where the no project (or no build) alternative is the "circumstance under which the project does not proceed."

The No Build Alternative would maintain the current two-lane, unimproved design of El Camino Real between Via de la Valle and San Dieguito Road. No additional capacity would be provided for traffic in this road segment. No pedestrian walkways or bicycle lanes would be provided in this road segment. No signals for pedestrian/equestrian crossings at the Horsepark and Polo Club entrance driveways would be provided. This segment of El Camino Real would continue to be subject to periodic flooding. The bridge over the San Dieguito River would not be replaced with a higher structure that is above the 100-year flood level and conforms to current seismic standards. The existing congested traffic conditions, flood risk, and potential for bridge damage during a seismic event would continue. The road configuration would continue to be inconsistent with current approved planning documents for the study area. However, the existing low-level, rural appearance of the road and bridge would not be affected. Also, there would be no potential impacts to wetlands in the drainage ditch parallel to El Camino Real, in the drainage ditch parallel to Via de la Valle, or in the San Dieguito River. The existing driveways and property at Horsepark and Polo Club recreational facilities would not be affected. Other potential adverse effects of the project construction would not occur.

5.3 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Section 15126.6(e) of the CEQA Guidelines notes that if the environmentally superior alternative is the No Project Alternative, then the EIR shall also identify an environmentally superior alternative among the other alternatives. For the El Camino Real Bridge/Road Widening Project, continuation of existing conditions would result in continued seismic hazards to vehicular travel on the bridge, continued flood risk for El Camino Real roadway, and continued unacceptable traffic congestion, among other conditions. Therefore, the No Build Alternative is not superior to the build alternatives in terms of these issues. However, the No Build Alternative would avoid other impacts to the project area, including impacts to neighboring land uses and MHPA adjacency and visual, paleontological and biological resources, so the No Build Alternative would be superior to the build alternative for those issues. The build alternatives are compared below to evaluate which alternative best minimizes the full range of potential impacts while still satisfying most or all of the project objectives, and therefore be the environmentally superior alternative among the build alternatives.

5.3.1 Comparison of Alternatives Considered as the Proposed Project

As discussed in Section 2, the build alternatives analyzed at an equal level of detail in Section 3 of this recirculated EIR are the following:

- Central Alignment Alternative
- Road Capacity Alternative
- Bicycle Safety Alternative
- Western Alignment Alternative
- Eastern Alignment Alternative
- Roundabout Alternative
- Lower Elevation Alternative

These alternatives were developed by a multi-disciplinary team, with the Roundabout Alternative added after circulation of the 2006 Draft EIR. Five of the seven alternatives fully achieve the project purpose and need, and two alternatives partially achieve the project purpose and need. The seven alternatives avoid or minimize environmental impacts to various degrees. Each of these build alternatives is analyzed at an equal level of detail in Section 3 to facilitate the alternatives comparison and to facilitate compatibility with the NEPA evaluation process that is proceeding in parallel with this recirculated EIR prepared to comply with CEQA.

Although any of the seven build alternatives could be selected as the proposed project, it should be noted that two alternatives are not considered viable by FHWA. These are the "narrow" cross section alternatives: the Road Capacity Alternative and the Bicycle Safety Alternative. FHWA does not consider these alternatives viable because they do not provide all features needed to completely meet the purpose and need, and consequently, these two alternatives are not analyzed in the EA. However, as noted in CEOA Guidelines Section 15126.6(a), a range of reasonable alternatives which would "feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project" should be described in an EIR. The narrow roadway alternatives are analyzed in detail in this recirculated EIR in order to facilitate a complete evaluation of the comparative merits of the alternatives as discussed in this section, including the two that have the narrowest right-of-way possible, for informed decision-making about the project. This detailed analysis is also anticipated to be helpful for various permitting agencies, including the California Coastal Commission. Although these two alternatives are included in the detailed analysis of the EIR and the following comparison for identification of the environmentally superior alternative, because they are not considered feasible by FHWA, funding to construct the bridge associated with the narrow alternatives would have to be independent of the proposed federal funding and would have to be obtained by the City. The federal funding is estimated to be approximately \$15 to \$20 million.

A matrix comparing the impacts that would result from each of these alternatives and how each alternative performs in terms of key issues is presented in Table 5-1.

Based on the compilation in Table 5-1, the seven build alternatives would generate similar impacts and perform similarly in terms of the following issues:

- historical resources
- farmland
- public utilities
- hydrology/water quality
- paleontology
- air quality
- noise
- greenhouse gas emissions

These issues, therefore, do not distinguish the alternatives for identification of the environmentally superior alternative and are not discussed further in this section.

The seven build alternatives have different levels of impact and performance in terms of the following issues:

- land use
- traffic/circulation
- visual/aesthetics
- geology/seismicity/soils
- biological resources

These issues, therefore, help distinguish the alternatives for identification of the environmentally superior alternative as discussed below.

Environmental Issue	Central	Road Capacity	Bicycle Safety	Western	Eastern	Roundabout	Lower Elevation	No Build
LAND USE	1 significant mitigable impact	1 significant mitigable impact	1 significant mitigable impact	1 significant mitigable impact	<i>1 significant</i> <i>mitigable impact</i>	1 significant mitigable impact	1 significant mitigable impact	No significant impacts
Compatibility with planning documents	Generally consistent	Not consistent with key goals/policies	Not consistent with key goals/policies	Generally consistent	Generally consistent	Generally consistent	Generally consistent	Not consistent with key goals/policie s
Impacts on existing land uses	Moderate impacts to all neighboring properties.	Minimizes impacts to properties east of road.	Minimizes impacts to properties east of road.	Maximizes impacts to properties west of road.	Eliminates impacts to properties west of road; second greatest impacts to properties east of road.	Eliminates impacts to properties west of road; maximizes impacts to properties east of road.	Moderate impacts to all neighboring properties.	No impacts
Impacts on future projects (JPA future restoration on former Boudreau property)	No impact past City slope easement; wetland mitigation implements a portion of the JPA's restoration plan.	No impact past City slope easement; wetland mitigation implements a portion of the JPA's restoration plan.	No impact past City slope easement; wetland mitigation implements a portion of the JPA's restoration plan.	Road/bridge impacts eastern edge; wetland mitigation implements a portion of the JPA's restoration plan.	No impact past City slope easement; wetland mitigation implements a portion of the JPA's restoration plan.	Road/bridge has a small impact at San Dieguito Road intersection from grading; wetland mitigation implements a portion of the JPA's restoration plan.	No impact past City slope easement; wetland mitigation implements a portion of the JPA's restoration plan.	No impact

Table 5-1Comparison of Alternatives

Environmental	Central	Road	Bicycle Safety	Western	Eastern	Roundabout	Lower	No Build
Issue		Capacity					Elevation	
Impacts on future	Has minor	Avoids	Avoids	Avoids impacts	Has second greatest	Has maximum	Has minor	No impact
projects (Rancho	impacts along	impacts along	impacts along	along west side	impact along west	impact along	impacts along	
del Mar)	west side due	west side due	west side due	due to El	side due to El	west side due to	west side due to	
	to El Camino	to El Camino	to El Camino	Camino Real	Camino Real and	El Camino Real	El Camino Real	
	Real and has	Real and has	Real and has	and has impacts	has impacts similar	and has	and has impacts	
	impacts	impacts	impacts	similar to other	to other build	maximum	similar to other	
	similar to other	similar to other	similar to other	build	alternatives along	impact along	build alternatives	
	build	build	build	alternatives	north side due to	north side due to	along north side	
	alternatives	alternatives	alternatives	along north side	Via de la Valle.	Via de la Valle.	due to Via de la	
	along north	along north	along north	due to Via de la			Valle.	
	side due to Via	side due to Via	side due to Via	Valle.				
	de la Valle.	de la Valle.	de la Valle.					
Facilitation of an	Provides	No bicycle	No pedestrian	Provides	Provides additional	Provides	Does not provide	No bicycle
existing segment	additional	lanes or	walkways;	additional	undercrossing	additional	additional	lanes or
of the Coast to	undercrossing	pedestrian	provides	undercrossing	clearance.	undercrossing	undercrossing	pedestrian
Crest TrailJPA	clearance.	walkways;	additional	clearance.		clearance.	clearance.	walkways;
plans		provides	undercrossing					does not
		additional	clearance.					provide
		undercrossing						additional
		clearance.						undercrossin
								g clearance.

Table 5-	1 (con	tinued)
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Environmental Issue	Central	Road Capacity	Bicycle Safety	Western	Eastern	Roundabout	Lower Elevation	No Build
Effects on Del Mar Horsepark	Minor permanent intrusion along eastern edge of property.	Moderate permanent intrusion along eastern edge of property.	Moderate permanent intrusion along eastern edge of property.	Most severe permanent intrusion along eastern edge of property.	Potential benefit from City vacating existing El Camino Real alignment fronting Horsepark south of driveway. Minimizes impacts to middle reach of existing drainage ditch except at driveway. Ditch segment must be widened at river entrance.	Potential benefit from City vacating existing El Camino Real alignment fronting Horsepark south of driveway. Minimizes impacts to middle reach of existing drainage ditch except at driveway. Ditch segment must be widened at river entrance.	Minor permanent intrusion along eastern edge of property.	No impact
Effects on Polo Club	Moderate permanent intrusion along western edge of property.	Zero permanent intrusion along western edge of property.	Zero permanent intrusion along western edge of property.	Zero permanent intrusion along western edge of property.	Most severe permanent intrusion along western side of property, except for Roundabout Alternative.	Most severe permanent intrusion along western side of property.	Moderate permanent intrusion along western edge of property.	No impact
Effects on Fairbanks Ranch Golf Course	Moderate permanent intrusion into golf course.	No permanent intrusion into golf course.	No permanent intrusion into golf course.	Minor permanent intrusion into golf course.	Most severe permanent intrusion into golf course except for Roundabout Alternative, but would not affect fairway or cart path.	Most severe permanent intrusion into golf course, but would not affect fairway or cart path.	Moderate permanent intrusion into golf course.	No impact

Environmental	Central	Road	Bicycle Safety	Western	Eastern	Roundabout	Lower	No Build
Issue		Capacity					Elevation	
Consistency with	Would conform to the MSCP	Would conform to the MSCP and	Would conform to the MSCP and	Would conform to the MSCP and	No impact			
the MSCP and City of San	MSCP and	MSCP and	MSCP and	and	implementing	implementing	implementing	
Diego Subarea	implementing	implementing	implementing	implementing	regulations. MHPA	regulations.	regulations.	
Plan.	regulations.	regulations.	regulations.	regulations.	land use adjacency	MHPA land use	MHPA land use	
1 1411.	MHPA land	MHPA land	MHPA land	MHPA land use	mitigation measures	adjacency	adjacency	
	use adjacency	use adjacency	use adjacency	adjacency	are necessary during	mitigation	mitigation	
	mitigation	mitigation	mitigation	mitigation	construction.	measures are	measures are	
	measures are	measures are	measures are	measures are		necessary during	necessary during	
	necessary	necessary	necessary	necessary		construction.	construction.	
	during	during	during	during				
	construction.	construction.	construction.	construction.				
TRAFFIC /	No significant	2 significant	1 significant	No significant	No significant	No significant	No significant	No
CIRCULATION	impacts	unmitigable	unmitigable	impacts	impacts	impacts	impacts	significant
		impacts.	impact.					impacts
Constructability	Moderately	Severely	Severely	Unconstrained	Completely	Completely	Moderately	No impact
	constrained.	constrained.	constrained.	with some	unconstrained for	unconstrained	constrained.	
				access issues.	bridge and road	for bridge and		
					north of bridge.	road north of		
						bridge.		
Bridge	Spans at least	Spans at least	Spans at least	Spans at least	Spans two avian	Spans two avian	Spans at least	No impact
Construction	three avian	three avian	three avian	three avian	breeding seasons	breeding seasons	three avian	
Duration	breeding	breeding	breeding	breeding	with restrictions due	with restrictions	breeding seasons	
	seasons with	seasons with	seasons with	seasons with	to noise impacts to	due to noise	with restrictions	
	restrictions	restrictions	restrictions	restrictions due	sensitive birds.	impacts to	due to noise	
	due to noise	due to noise	due to noise	to noise impacts		sensitive birds.	impacts to	
	impacts to	impacts to	impacts to	to sensitive			sensitive birds.	
	sensitive birds.	sensitive birds.	sensitive birds.	birds.				

Environmental Issue	Central	Road Capacity	Bicycle Safety	Western	Eastern	Roundabout	Lower Elevation	No Build
Bridge Staging	Two stages	Two stages; second stage would have two 10.5-foot wide traffic lanes during construction.	Two stages; second stage would have two 10.5-foot wide traffic lanes during construction.	Two stages	One stage	One stage	Two stages	No impact
Traffic Operation	Four lanes, but full intersection not constructed at El Camino Real and Via de la Valle; full width striping not provided at El Camino Real North and Via de la Valle.	Four lanes but no usable median; no LOS improvement.	Two lanes only; no LOS improvement.	Four lanes, but full intersection not constructed at El Camino Real and Via de la Valle; full width striping not provided at El Camino Real North and Via de la Valle.	Four lanes and full intersections except full width striping not provided at El Camino Real North and Via de la Valle.	Four lanes; but El Camino Real/Via de la Valle roundabout operates at LOS E and F in 2035.	Four lanes, but full intersection not constructed at El Camino Real and Via de la Valle; full width striping not provided at El Camino Real North and Via de la Valle.	Two lanes only; no LOS improvemen t.
Pedestrians, Bicyclists, Equestrians	Full permanent benefits.	No bicycle lanes or pedestrian walkways.	No pedestrian walkways.	Full permanent benefits	Full permanent benefits	Full permanent benefits except no signalization at intersections	Full permanent benefits	No improvemen ts
Access	Special turn pockets	No turn pockets	Special turn pockets	Special turn pockets	Driveways extending from signalized intersection at Horsepark /Polo Club entrances; frontage road	Driveways extending from intersection at Horsepark /Polo Club entrances; frontage road; no signalization at roundabouts	Special turn pockets	No impact

Environmental	Central	Road Capacity	Bicycle Safety	Western	Eastern	Roundabout	Lower	No Build
Issue							Elevation	
VISUAL / AESTHETICS	1 significant unmitigable impact and 1 significant mitigable impact	1 significant unmitigable impact and 3 significant mitigable impacts	1 significant unmitigable impact and 3 significant mitigable impacts	1 significant unmitigable impact and 1 significant mitigable impact	No significant impacts			
Visual Impact	Loss of distinctive bridge railing and trees; view blockage from cantilever fence.	Retaining walls along road; view blockage from cantilever fence.	Retaining walls along road; view blockage from cantilever fence.	Loss of distinctive bridge railing; view blockage from cantilever fence.	Loss of distinctive bridge railing and trees; view blockage from cantilever fence.	Loss of distinctive bridge railing and trees; view blockage from cantilever fence.	Loss of distinctive bridge railing and trees; view blockage from cantilever fence.	No impact
HISTORICAL RESOURCES	2 significant mitigable impacts	No significant impacts						
Prehistoric Sites, Historic Sites, Native American Values	No unique resources or Traditional Cultural Resources identified; monitoring is required due to potential for buried resources.	No unique resources or Traditional Cultural Resources identified; monitoring is required due to potential for buried resources.	No impact					

Environmental Issue	Central	Road Capacity	Bicycle Safety	Western	Eastern	Roundabout	Lower Elevation	No Build
FARMLAND	No significant impacts	No significant impacts	No significant impacts	No significant impacts	No significant impacts	No significant impacts	No significant impacts	No significant impacts
Farmland conversion	Farmland converted by wetlands mitigation plan rates below the threshold for protection.	Farmland converted by wetlands mitigation plan rates below the threshold for protection.	No impact					
PUBLIC UTILITIES	No significant impacts	No significant impacts	No significant impacts	No significant impacts	No significant impacts	No significant impacts	No significant impacts	No significant impacts
Relocation of utilities	Power poles, Gas line Fiber optic cable, Sewer	Power poles, Gas line Fiber optic cable, Sewer	Power poles, Gas line Fiber optic cable, Sewer	Power poles, Gas line Fiber optic cable, Sewer	Gas line, Fiber optic cable, Sewer	Gas line, Fiber optic cable, Water line, Sewer	Power poles, Gas line Fiber optic cable, Sewer	No impact; but gas line on bridge remains vulnerable to damage.

Environmental Issue	Central	Road Capacity	Bicycle Safety	Western	Eastern	Roundabout	Lower Elevation	No Build
HYDROLOGY/ WATER QUALITY	2 significant mitigable impacts	2 significant mitigable impacts	2 significant mitigable impacts	2 significant mitigable impacts	2 significant mitigable impacts	2 significant mitigable impacts	2 significant mitigable impacts	No significant impacts
Increase in 100- year velocities upstream; need for additional construction BMPs.	Upstream bank protection and additional BMPs are feasible.	Upstream bank protection and additional BMPs are feasible.	Upstream bank protection and additional BMPs are feasible.	Upstream bank protection and additional BMPs are feasible.	Upstream bank protection and additional BMPs are feasible.	Upstream bank protection and additional BMPs are feasible.	Upstream bank protection and additional BMPs are feasible.	No impacts.
GEOLOGY / SEISMICITY / SOILS	No significant impacts	No significant impacts	No significant impacts	No significant impacts	No significant impacts	No significant impacts	No significant impacts	No significant impacts
Ground shaking	Moderate potential for damage to project components (embankment slope);new bridge an improvement.	Most severe potential for damage to project components (retaining wall); new bridge an improvement.	Most severe potential for damage to project components (retaining wall); new bridge an improvement.	Moderate potential for damage to project components (embankment slope); new bridge an improvement.	Moderate potential for damage to project components (embankment slope); new bridge an improvement.	Moderate potential for damage to project components (embankment slope); new bridge an improvement.	Least potential for damage to project components (lowest embankment slope); new bridge an improvement.	Bridge could be severely damaged in an earthquake.
Liquefaction	Embankment slope most vulnerable to catastrophic failure from liquefaction; new bridge an improvement.	Retaining walls less vulnerable to catastrophic failure from liquefaction; new bridge an improvement.	Retaining walls less vulnerable to catastrophic failure from liquefaction; new bridge an improvement.	Embankment slope most vulnerable to catastrophic failure from liquefaction; new bridge an improvement.	Embankment slope most vulnerable to catastrophic failure from liquefaction; new bridge an improvement.	Embankment slope most vulnerable to catastrophic failure from liquefaction; new bridge an improvement	Embankment slope most vulnerable to catastrophic failure from liquefaction, but height of slope is lower; new bridge an improvement.	Bridge could be severely damaged in an earthquake.

Environmental Issue	Central	Road Capacity	Bicycle Safety	Western	Eastern	Roundabout	Lower Elevation	No Build
Soils Conditions	Embankment slope less vulnerable to soil corrosion damage.	Retaining walls more vulnerable to soil corrosion damage.	Retaining walls more vulnerable to soil corrosion damage.	Embankment slope less vulnerable to soil corrosion damage.	Embankment slope less vulnerable to soil corrosion damage.	Embankment slope less vulnerable to soil corrosion damage.	Embankment slope less vulnerable to soil corrosion damage.	No impact
Erosion	Moderately vulnerable to erosion	Least vulnerable to erosion	Least vulnerable to erosion	Moderately vulnerable to erosion	Most vulnerable to erosion	Most vulnerable to erosion	Moderately vulnerable to erosion	No impact
Hazardous Materials	No contamination sites nearby; previous farming on wetlands mitigation site.	No contamination sites nearby; previous farming on wetlands mitigation site.	No contamination sites nearby; previous farming on wetlands mitigation site.	No contamination sites nearby; previous farming on wetlands mitigation site.	No contamination sites nearby; previous farming on wetlands mitigation site.	Closer to two contaminatio n sites than other alternatives; previous farming on wetlands mitigation site.	No contamination sites nearby; previous farming on wetlands mitigation site.	No impact
PALEONTO- LOGICAL RESOURCES	1 significant mitigable impact	1 significant mitigable impact	1 significant mitigable impact	1 significant mitigable impact	1 significant mitigable impact	1 significant mitigable impact	1 significant mitigable impact	No significant impacts
Fossils	Disturbance of a formation with the potential to contain fossils.	Disturbance of a formation with the potential to contain fossils.	Disturbance of a formation with the potential to contain fossils.	Disturbance of a formation with the potential to contain fossils.	Disturbance of a formation with the potential to contain fossils.	Disturbance of a formation with the potential to contain fossils.	Disturbance of a formation with the potential to contain fossils.	No impact

Environmental Issue	Central	Road Capacity	Bicycle Safety	Western	Eastern	Roundabout	Lower Elevation	No Build
AIR QUALITY	No significant impacts	No significant impacts	No significant impacts	No significant impacts	No significant impacts	No significant impacts	No significant impacts	No significant impacts
Construction- related emissions	Do not exceed thresholds	Do not exceed thresholds	Do not exceed thresholds	Do not exceed thresholds	Do not exceed thresholds	Do not exceed thresholds	Do not exceed thresholds	Do not exceed thresholds
Mobile/area source emissions	No impact	No impact	No impact	No impact	No impact	No impact	No impact	No impact
Plan consistency	Consistent	Consistent	Consistent	Consistent	Consistent	Consistent	Consistent	No impact
NOISE	No significant impacts	No significant impacts	No significant impacts	No significant impacts	No significant impacts	No significant impacts	No significant impacts	No significant impacts
Construction and operational noise	No thresholds exceeded	No thresholds exceeded	No thresholds exceeded	No thresholds exceeded	No thresholds exceeded	No thresholds exceeded	No thresholds exceeded	No impact
BIOLOGICAL RESOURCES	3 significant mitigable impacts	3 significant mitigable impacts	3 significant mitigable impacts	3 significant mitigable impacts	3 significant mitigable impacts	3 significant mitigable impacts	3 significant mitigable impacts	No significant impacts
Permanent USACE/RWQCB wetland impacts (acres)	3.69	1.28	1.28	2.76	2.64	4.22	3.69	θ
Temporary USACE/RWQCB wetland impacts (acres)	0.94	0.72	0.72	0.6	1.65	1.84	0.94	θ
Total wetland Impacts (acres)	4.60	1.98	1.98	4.07	4.57	6.4 4	4 .60	θ
USACE/RWQCB Jurisdictional areas	<u>Permanent:</u> <u>3.69</u> <u>Temporary:</u> <u>0.94</u> Total: 4.63	Permanent: <u>1.28</u> <u>Temporary:</u> <u>0.72</u> Total: 2.00	Permanent: 1.28 <u>Temporary:</u> 0.72 <u>Total: 2.00</u>	<u>Permanent:</u> <u>2.76</u> <u>Temporary:</u> <u>0.6</u> Total: 3.36	Permanent: 2.64 <u>Temporary:</u> <u>1.65</u> <u>Total: 4.29</u>	Permanent: <u>4.23</u> <u>Temporary:</u> <u>1.84</u> Total: 6.07	Permanent: 3.69 <u>Temporary:</u> 0.94 <u>Total: 4.63</u>	<u>0</u>

Environmental	Central	Road Capacity	Bicycle Safety	Western	Eastern	Roundabout	Lower	No Build
Issue							Elevation	
<u>CDFW</u>	Permanent:	Permanent:	Permanent: 1.33	Permanent:	Permanent: 2.84	Permanent:	Permanent: 3.67	<u>0</u>
Jurisdictional	<u>3.67</u>	<u>1.33</u>	Temporary:	<u>2.92</u>	Temporary:	<u>4.63</u>	Temporary:	
areas	Temporary:	Temporary:	<u>0.80</u>	Temporary:	<u>1.73</u>	Temporary:	<u>0.93</u>	
	<u>0.93</u>	<u>0.80</u>	<u>Total: 2.13</u>	<u>1.14</u>	<u>Total: 4.57</u>	<u>1.81</u>	<u>Total: 4.6</u>	
Mitigation area	<u>Total: 4.6</u> 19.2	<u>Total: 2.13</u> 9.96	9.96	<u>Total: 4.06</u> 17.23	19.7	<u>Total: 6.44</u> 26.89	19.2	
needed (ac)						(Exceeds JPA Mitigation Site availability by 6.48 ac. However,		
						additional suitable mitigation opportunities		
						exist within the project vicinity;		
						therefore, additional off-site mitigation		
						would be achievable on a site owned by the City.)		
Impacts to coastal sage scrub (acres)	0.76	0.445	0.445	0.91	0.44	0.787	0.76	0

Environmental Issue	Central	Road Capacity	Bicycle Safety	Western	Eastern	Roundabout	Lower Elevation	No Build
Sensitive Plants	4 Palmer's sagewort; 2 southwestern spiny rush	4 Palmer's sagewort	4 Palmer's sagewort	4 Palmer's sagewort; 1 San Diego marsh-elder	41 southwestern spiny rush	16 San Diego sunflower plus a 0.03- acre patch of San Diego sunflower; 41 southwestern spiny rush	4 Palmer's sagewort; 2 southwestern spiny rush	No impact
Sensitive Wildlife	Remove occupied habitat for Clark's marsh wren, light- footed clapper rail, and least Bell's vireo. Remove suitable habitat for yellow warbler, yellow- breasted chat, and nesting birds and raptors	Remove occupied habitat for Clark's marsh wren, light- footed clapper rail, and least Bell's vireo. Remove suitable habitat for yellow warbler, yellow-breasted chat, and nesting birds and raptors	Remove occupied habitat for Clark's marsh wren, light- footed clapper rail, and least Bell's vireo. Remove suitable habitat for yellow warbler, yellow-breasted chat, and nesting birds and raptors	Remove occupied habitat for Clark's marsh wren, light- footed clapper rail, and least Bell's vireo. Remove suitable habitat for yellow warbler, yellow- breasted chat, and nesting birds and raptors	Remove occupied habitat for Clark's marsh wren, yellow- breasted chat, light-footed clapper rail, and least Bell's vireo. Remove suitable habitat for yellow warbler, and nesting birds and raptors.	Remove occupied habitat for Clark's marsh wren,, yellow- breasted chat, light-footed clapper rail, and least Bell's vireo. Remove suitable habitat for yellow warbler, and nesting birds and raptors.	Remove occupied habitat for Clark's marsh wren, light- footed clapper rail, least Bell's vireo. Remove suitable habitat for yellow warbler, yellow-breasted chat, and nesting birds and raptors	No impact
Number of breeding bird seasons spanned	Three	Three	Three	Three	Two	Two	Three	No impact

Table 5-1	(continued)
I abit o I	(commucu)

Environmental Issue	Central	Road Capacity	Bicycle Safety	Western	Eastern	Roundabout	Lower Elevation	No Build
GREENHOUSE GAS EMISSIONS	No significant impacts							
Generate GHGs	No excessive generation							
Compatibility with Plans	Compatible	No improvements						

Note: Acreages for USACE/RWQCB and CDFW impacts are not additive and occur within Total Wetland Impacts, as presented in Table 3.12-4. The original acres of total wetland mitigation requirements from the proposed project would be increased if road and bridge impacts to the Fairbanks Ranch property are projected to be impacted as a mitigation site, in some cases also requiring additional off-site mitigation on a site owned by the City similar to the Roundabout Alternative.

For land use, the seven build alternatives would cause significant impacts and would perform differently in the following ways:

- The Road Capacity and Bicycle Safety alternatives would not be consistent with key goals/policies.
- The Western Alignment Alternative maximizes impacts to properties west of El Camino Real (Horsepark and Mary's Tack and Feed).
- The Eastern Alignment and Roundabout alternatives maximize impacts to properties east of El Camino Real (Polo Fields and planned Rancho del Mar development).

For traffic/circulation, the seven build alternatives would cause different significant impacts and would perform differently in the following ways:

- The Road Capacity and Bicycle Safety alternatives would generate the most significant and unmitigable impacts.
- The bridges for the Road Capacity and Bicycle Safety alternatives would be the most difficult to construct and would have the narrowest travel lanes during the two-year construction period.
- The Road Capacity Alternative would have no turn pockets, so would not provide storage for turning vehicles.
- The Road Capacity Alternative would not provide bicycle lanes or pedestrian walkways, so would not enhance access for pedestrians or bicyclists in the area.
- The Bicycle Safety Alternative would not provide pedestrian walkways, so would not enhance access for pedestrians in the area.
- The Eastern Alignment and Roundabout alternatives would have the best constructability and interfere the least with existing travel during construction, because the bridge could be built in one stage and the bridge and road north of bridge would be completely separate from existing El Camino Real.
- The Eastern Alignment and Roundabout alternatives would have the shortest bridge construction duration and span the fewest bird breeding seasons.
- The Eastern Alignment Alternative is the only alternative that would provide a signalized intersection with adequate approach geometry to achieve improved intersection LOS in 2035 consisting of four lanes (a left, two through lanes and a dedicated right) at Via de la Valle and El Camino Real (lining up with De la Valle Place).

For visual/aesthetics, the seven build alternatives would cause different significant impacts and would perform differently in the following ways:

 All build alternatives would cause the same significant unmitigable visual impact of view blockage due to the cantilever fence. The Road Capacity and Bicycle Safety alternatives would generate the most additional significant impacts that would be mitigable, due to being constructed on vertical retaining walls instead of sloped embankments.

For geology/seismicity/soils, the seven build alternatives would not cause significant impacts but would perform differently in the following ways:

- The alternatives with retaining walls (Road Capacity and Bicycle Safety) would have the most potential for damage in terms of ground shaking and corrosion, and the least potential for damage from liquefaction and erosion.
- The other five build alternatives, which would be on embankment, would have similar potential for damage in terms of geologic/seismic hazards.
- The Roundabout Alternative would be closer to two contamination sites than other alternatives.

For biological resources, the seven build alternatives would cause different impacts and would perform differently in the following ways:

- The narrow cross section alternatives (Road Capacity and Bicycle Safety alternatives) would impact the least acreage of sensitive vegetation communities and require the least acreage of mitigation on the JPA Mitigation Site.
- Of the full widened roadway cross section alternatives, the Eastern Alignment Alternative would cause the least permanent impacts to USACE/RWQCB wetlands (2.64 acres), and the Roundabout Alternative would cause the greatest permanent impacts to USACE/RWQCB wetlands (4.22 acres).
- Of the full widened roadway cross section alternatives, the Eastern Alignment Alternative would cause the least impacts to coastal sage scrub (0.44 acre), and the Western Alignment Alternative would cause the greatest impacts to coastal sage scrub (0.91 acre).
- Wetland habitat mitigation for all of the alternatives except for the Roundabout Alternative can be attained within the 20.4-acre area available on the JPA Mitigation Site. Additional off-site mitigation would be achievable for the Roundabout Alternative in the project vicinity on a site owned by the City.
- Mitigation for impacts to upland habitats for all of the alternatives can be accomplished through the Habitat Acquisition Fund.
- The Eastern Alignment and Roundabout alternatives would impact more individual numbers of southwestern spiny rush, and the other build alternatives would impact more Palmer's sagewort.
- All build alternatives would remove occupied habitat for Clark's marsh wren, light-footed clapper rail, and least Bell's vireo. All build alternatives would remove suitable habitat for yellow warbler and nesting birds and raptors.

- The Eastern Alignment and Roundabout alternatives would remove occupied habitat for the yellow-breasted chat, whereas the other build alternatives would remove suitable habitat for this species.
- The Eastern Alignment Alternative and the Roundabout Alternative would impact the San Dieguito River corridor for the shortest construction time because the bridge could be constructed in one stage, spanning two bird breeding seasons. All of the other build alternatives, including the narrow cross section alternatives, would have greater temporal impacts on sensitive wildlife because bridge construction would take longer and would have to span three bird breeding seasons.

The following conclusions are based on the above evaluation of impacts and performance for the seven build alternatives among the distinguishing issues of land use, traffic/circulation, visual/aesthetics, geology/seismicity/soils, and biological resources.

The narrow cross section alternatives (Road Capacity and Bicycle Safety alternatives) would generate the most severe impacts and poorest performance for land use, traffic/circulation (including travel conditions during construction and long-term access for pedestrians), visual/aesthetics, and geologic hazards of ground shaking and corrosion. These alternatives would generate the least permanent impacts to USACE/RWQCB wetlands impact the least acreage of wetlands (1.982.00 acres).

The Western Alignment Alternative would impact the greatest area of land uses currently developed with structures (by shifting the alignment towards Horsepark and Mary's Tack and Feed west of El Camino Real). Among the full widened roadway cross section alternatives, the Western Alignment Alternative would generate the least impacts in terms of total overall <u>USACE/RWQCB</u> wetland acreage (4.073.36 acres), would generate the least acreage of temporary impacts to USACE/RWQCB wetlands (0.6 acre), and would require the least total mitigation acreage (17.23 acres).

The Central Alignment and Lower Elevation alternatives (which have the same footprint) would have moderate impacts to all neighboring properties both to the east and west of El Camino Real. These alternatives would have the second largest permanent impacts to USACE/RWQCB wetlands (3.69 acres) and second largest total <u>USACE/RWQCBoverall</u> wetland impacts (4.63θ acres).

The Roundabout Alternative would extend into roadway segments within the County jurisdiction to be completely constructed. The Roundabout Alternative would generate the greatest acreage of permanent impacts to USACE/RWQCB wetlands (4.22 acres), the greatest acreage of temporary impacts to USACE/RWQCB wetlands (1.84 acre), the greatest acreage of impacts in terms of total <u>USACE/RWQCBoverall</u> wetland acreage (6.0744 acres), and would require the greatest total mitigation acreage (26.88 acres). This is the only alternative that would require wetland mitigation beyond the JPA Mitigation Site. However, additional suitable mitigation opportunities exist within the project vicinity; therefore, additional off-site mitigation would be achievable for the Roundabout Alternative on a site owned by the City.

The Eastern Alignment Alternative would impact the smallest area of land uses currently developed with structures (by shifting the alignment towards the golf course and Polo fields east of El Camino Real). The Eastern Alignment Alternative has the best performance in terms of long-term traffic improvement because it is the only alternative that would provide a signalized intersection with approach lanes consisting of four lanes (a left, two through lanes and a dedicated

right) at Via de la Valle and El Camino Real (lining up with De la Valle Place). Among the full widened roadway alternatives, the Eastern Alignment Alternative would generate the least acreage of permanent impacts to USACE/RWQCB wetlands (2.64 acres). The Eastern Alignment Alternative (and the Roundabout Alternative) would impact the San Dieguito River corridor for the shortest time because the bridge construction would occur in one stage and would span only two bird breeding seasons. All of the other build alternatives, including the narrow cross section alternatives, would have greater temporal impacts on sensitive wildlife than the Eastern Alignment and Roundabout alternatives because bridge construction would take longer and would have to span three bird breeding seasons.

5.3.2 Identification of the Environmentally Superior Alternative

In summary, the Eastern Alignment Alternative is identified as the Environmentally Superior alternative and the least environmentally damaging alternative. This alternative would have the shortest temporal impacts on sensitive wildlife, would minimize impacts to land uses currently developed with structures, and would generate the best long-term improvements in traffic conditions without encroaching on roadway in County jurisdiction. This alternative would also generate the least impacts to existing traffic conditions during construction. Among the full widened roadway alternatives deemed feasible by FHWA/Caltrans, the Eastern Alignment Alternative would generate the least acreage of permanent impacts to USACE/RWQCB wetlands.

Although the narrow cross section alternatives (Road Capacity and Bicycle Safety alternatives) would impact the least acreage of sensitive vegetation, from a temporal standpoint these alternatives would have greater impacts to sensitive wildlife than the Eastern Alignment and Roundabout alternatives because bridge construction would have to span three bird breeding seasons (similar to the Western, Central, and Lower Elevation alternatives). In addition, the Road Capacity and Bicycle Safety alternatives would generate the most significant and unmitigable impacts to traffic/circulation, including having no pedestrian walkways and thus offering no improvement to pedestrian access in the area. These two alternatives also would generate the most severe impacts to existing traffic during the two-year construction period.

Although the Western Alignment Alternative would generate the least impacts in terms of total <u>USACE/RWQCBoverall</u> wetland acreage of the full widened roadway cross section alternatives, this alternative would have the most severe impacts on land uses with structures, including Mary's Tack and Feed. The Western Alignment Alternative, like all of the other build alternatives except the Eastern Alignment and Roundabout alternatives, would require three bird breeding seasons for bridge construction, so would have greater temporal impacts on sensitive wildlife. In addition, the Western Alignment Alternative (like the other build alternatives except the Eastern Alignment and Roundabout alternative), would not provide full intersection improvements at Via de la Valle and El Camino Real due to restrictions in available right of way. Future traffic conditions at Via de la Valle at El Camino Real would reflect existing (No Build) conditions at this intersection for the Central, Western, and Lower Elevation alternatives unless additional right of way is obtained.

Although the Roundabout Alternative would have the same construction advantages as the Eastern Alignment, the Roundabout Alternative would have a much larger impact footprint. As noted above, the Roundabout Alternative would generate the greatest acreage of temporary and permanent impacts to USACE/RWQCB wetlands, the greatest impacts to total <u>USACE/RWQCBoverall</u> wetlands, and would require the greatest total mitigation acreage. In addition, the Roundabout Alternative must extend into County jurisdiction to be completely constructed.

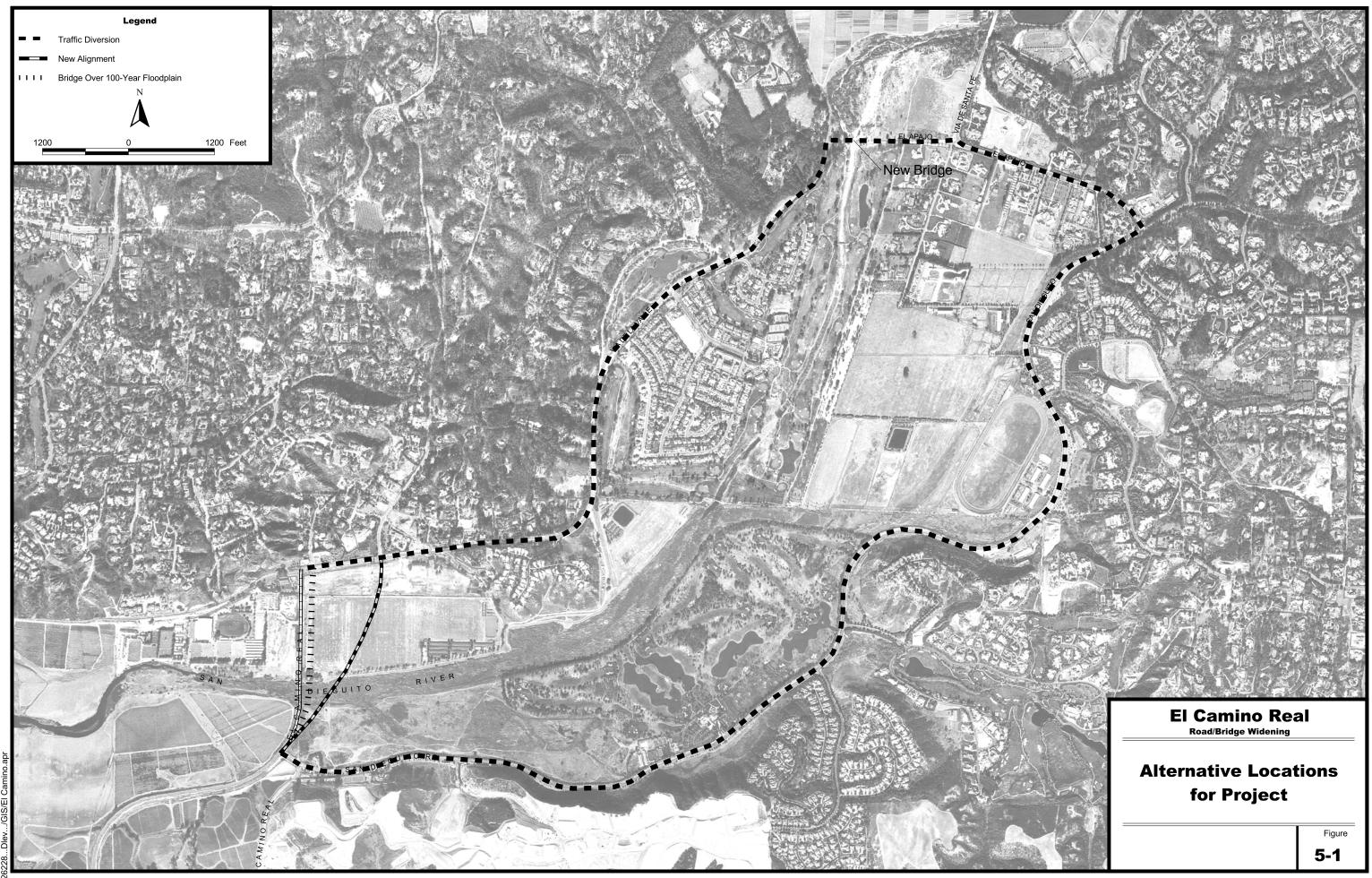
5.4 RATIONALE FOR ALTERNATIVE SELECTION

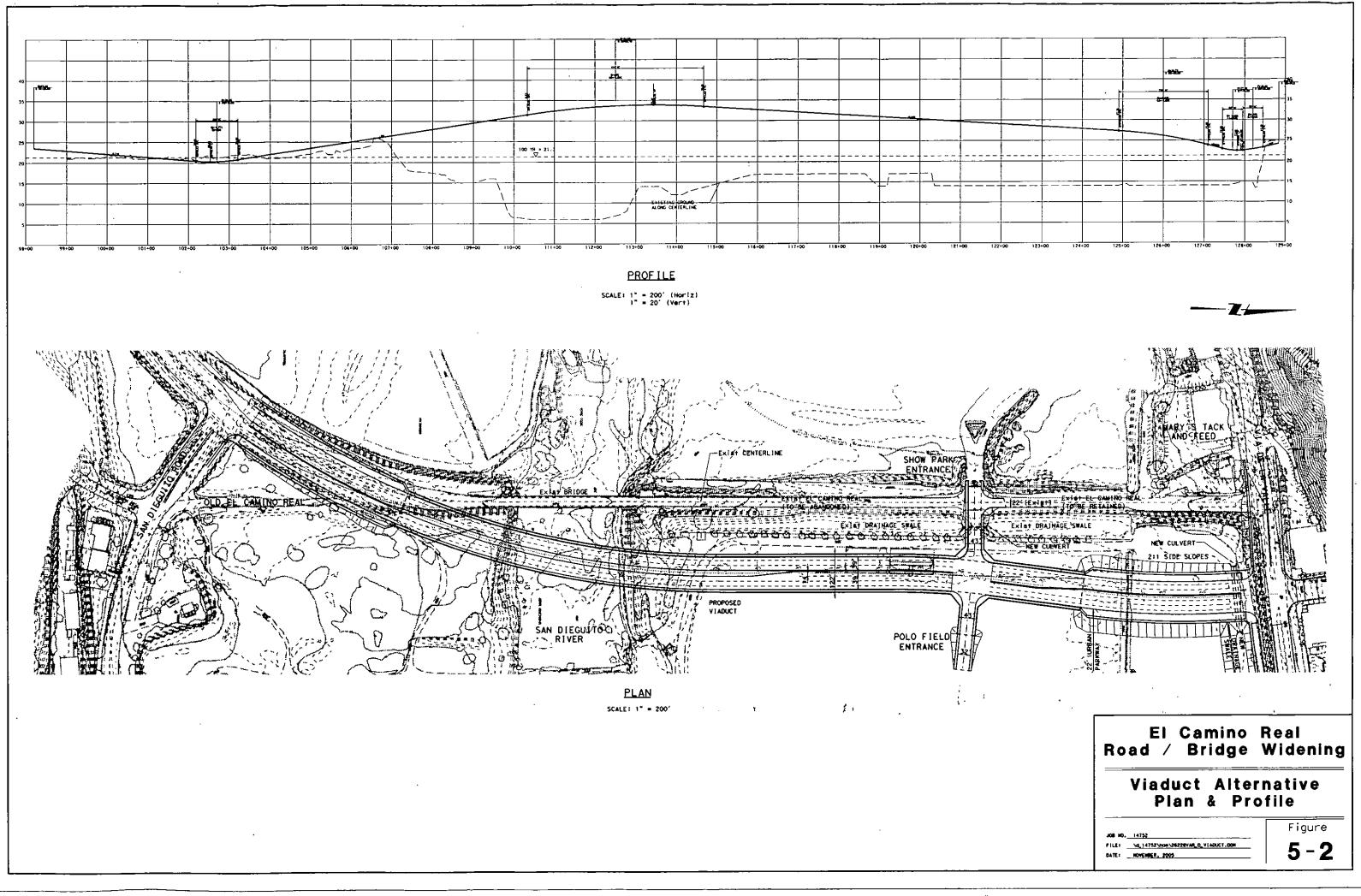
As discussed in Section 2.3 of this recirculated EIR, the City has identified the Eastern Alignment Alternative as its Preferred Alternative. This alternative allows the bridge and the roadway for El Camino Real north of the bridge to be constructed completely free of the existing bridge and roadway. The Eastern Alignment Alternative therefore would avoid lengthy disruption of traffic during construction. Also, the bridge could be built in one phase, so would need fewer piers (two sets of three versus two sets of four for most of the other alternatives).

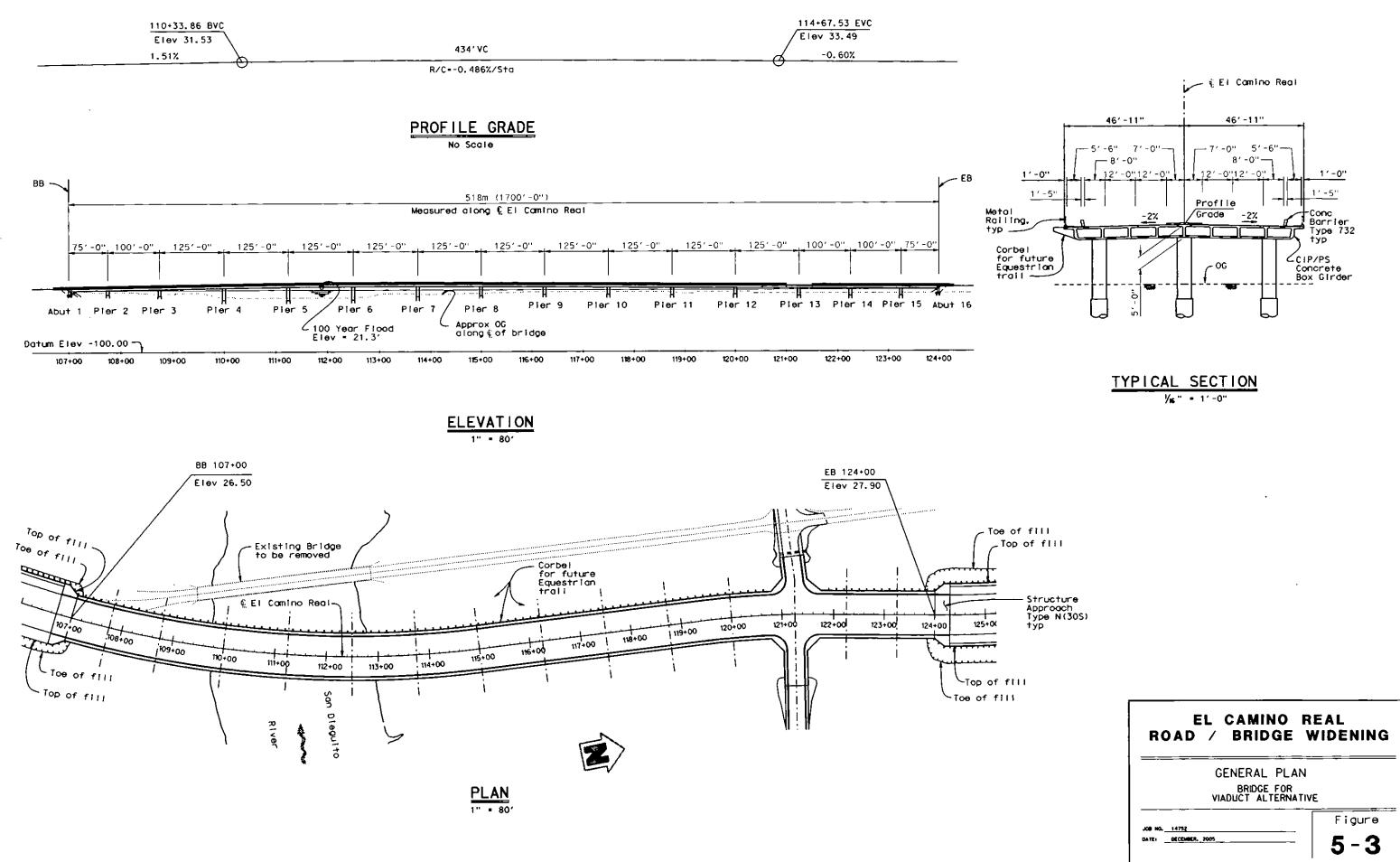
Construction of the bridge for the Eastern Alignment Alternative would affect the river for a shorter duration than most of the other alternatives. Bridge construction is anticipated to span three bird breeding seasons (when construction in the river would have to stop) for most of the alternatives, but would span only two bird breeding seasons for the Eastern Alignment Alternative because the bridge can be built in a single phase. Although the bridge for the Roundabout Alternative would be the same and offer the same construction timing advantages, the Roundabout Alternative would be more difficult to obtain permits from federal, state, and regional resource agencies for the Roundabout Alternative than for the Eastern Alignment Alternative.

The City also prefers the Eastern Alignment Alternative because it would generate the least impacts to properties developed with structures (Horsepark and Mary's Tack and Feed along the west side of El Camino Real), maximizes the alignment on City owned property, and minimizes the alignment in environmental tier lands and the Coastal Zone.

The Eastern Alignment Alternative would generate intersection operation benefits by moving the major intersection of El Camino Real and Via de la Valle to the east, lining up with De la Valle Place on the north leg instead of a commercial driveway as under existing conditions. The Eastern Alignment Alternative would thus provide more regulated turn movements, and would place the intersection of El Camino Real and Via de la Valle in a location that is less constrained by existing buildings along the southern edge of Via de la Valle and by steep slopes along the northern edge. The Eastern Alignment Alternative also is the only alternative that would allow signalized full intersection improvements for eastbound Via de la Valle at El Camino Real, including a left turn, two through lanes, and a dedicated right turn from eastbound Via de la Valle to southbound El Camino Real, without affecting existing commercial properties south of Via de la Valle and west of El Camino Real. Therefore, the Eastern Alignment Alternative provides the most improvement in long-term traffic operations.







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SECTION 6 MITIGATION MONITORING AND REPORTING PROGRAM

6.1 CITY GENERAL REQUIREMENTS

This Mitigation Monitoring and Reporting Program (MMRP) is designed to ensure compliance with Public Resources Code Section 21081.6 during implementation of mitigation measures. This program identifies at a minimum: the department responsible for the monitoring, what is to be monitored, how the monitoring shall be accomplished, the monitoring and reporting schedule, and completion requirements. A record of the MMRP will be maintained at the offices of the Entitlement Division, 1222 First Avenue, Fifth Floor, San Diego, CA, 92101. All mitigation measures contained in the Environmental Impact Report (Project Tracking System [PTS] No. 277550) shall be made conditions of the project as may be further described below.

A. GENERAL REQUIREMENTS – PART I Plan Check Phase (prior to permit issuance)

1. Prior to issuance of a Notice to Proceed (NTP), the Assistant Deputy Director (ADD) Environmental Designee of the Entitlements Division shall verify that the Mitigation Measures have been included in entirety on the submitted construction documents and contract specifications, and included under the heading, "Environmental Mitigation Requirements." In addition, the requirements for a Preconstruction Meeting shall be noted on all construction documents.

2. In addition, the Environmental Designee (MMC) shall verify that <u>the MMRP Conditions/Notes</u> that apply ONLY to the construction phases of this project are included VERBATIM, under the heading, "ENVIRONMENTAL/MITIGATION REQUIREMENTS."

3. These notes must be shown within the first three (3) sheets of the construction documents in the format specified for engineering construction document templates as shown on the City website:

http://www.sandiego.gov/development-services/industry/standtemp.shtml

4. The **TITLE INDEX SHEET** must also show on which pages the "Environmental/Mitigation Requirements" notes are provided.

5. **SURETY AND COST RECOVERY** – The Development Services Director or City Manager may require appropriate surety instruments or bonds from private Permit Holders to ensure the long-term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

B. GENERAL REQUIREMENTS – PART II Post Plan Check (After permit issuance/Prior to start of construction)

1. **PRE CONSTRUCTION MEETING IS REQUIRED TEN (10) WORKING DAYS PRIOR TO BEGINNING ANY WORK ON THIS PROJECT.** The PERMIT HOLDER/OWNER is responsible to arrange and perform this meeting by contacting the CITY RESIDENT ENGINEER (RE) of the Field Engineering Division and City staff from MITIGATION MONITORING COORDINATION (MMC). Attendees must also include the Permit holder's Representative(s), Job Site Superintendent and the following consultants:

[List project specific consultants here]

Note: Failure of all responsible Permit Holder's representatives and consultants to attend shall require an additional meeting with all parties present.

CONTACT INFORMATION:

a) The PRIMARY POINT OF CONTACT is the RE at the Field Engineering Division – 858-627-3200
b) For ENVIRONMENTAL REQUIREMENTS, it is required to call MMC at 858-627-3360

2. **MMRP COMPLIANCE:** This Project, PTS No. 2982 and /or Environmental Document #SCH No. 1999071104, shall conform to the mitigation requirements contained in the associated Environmental Document and implemented to the satisfaction of the Development Services Department's (DSD) Environmental Designee (MMC) and the City Engineer (RE). The requirements may not be reduced or changed but may be annotated (i.e. to explain when and how compliance is being met and location of verifying proof, etc.). Additional clarifying information may also be added to other relevant plan sheets and/or specifications as appropriate (i.e., specific locations, times of monitoring, methodology, etc

Note: Permit Holder's Representatives must alert RE and MMC if there are any discrepancies in the plans or notes, or any changes due to field conditions. All conflicts must be approved by RE and MMC BEFORE the work is performed.

3. **OTHER AGENCY REQUIREMENTS:** Evidence of compliance with all other agency requirements or permits shall be submitted to the RE and MMC for review and acceptance prior to the beginning of work or within one week of the Permit Holder obtaining documentation of those permits or requirements. Evidence shall include copies of permits, letters of resolution or other documentation issued by the responsible agency.

[List project specific required permits and civil penalty documents here]

4. MONITORING EXHIBITS

All consultants are required to submit, to RE and MMC, a monitoring exhibit on a 11x17 reduction of the appropriate construction plan, such as site plan, grading, landscape, etc., marked to clearly show the specific areas including the **LIMIT OF WORK**, scope of that discipline's work, and notes indicating when in the construction schedule that work will be performed. When necessary for clarification, a detailed methodology of how the work will be performed shall be included.

Note: Surety and Cost Recovery – When deemed necessary by the Development Services Director or City Manager, additional surety instruments or bonds from the private Permit Holder may be required to ensure the long term performance or implementation of required mitigation measures or programs. The City is authorized to recover its cost to offset the salary, overhead, and expenses for City personnel and programs to monitor qualifying projects.

5. OTHER SUBMITTALS AND INSPECTIONS:

The Permit Holder/Owner's representative shall submit all required documentation, verification letters, and requests for all associated inspections to the RE and MMC for approval per the following schedule:

DOCUMENT SUBMITTAL/INSPECTION CHECKLIST					
Issue Area	Document Submittal	Associated Inspection/Approvals/Notes			
General	Consultant Qualification Letters	Prior to Preconstruction Meeting			
General	Consultant Construction Monitoring Exhibits	Prior to or at Preconstruction Meeting			
Land Use	Land Use Adjacency Issues CVSRs	Land Use Adjacency Issue Site Observations			
Traffic	Verification of Traffic Mitigation	Prior to Issuance of Grading or Building Permits for Each Phase			
Biology	Biologist Limit of Work Verification	Limit of Work Inspection			
Biology	Biology Monitoring Reports	Biology/Habitat Inspection			
Archaeology	Archaeology Reports	Archaeology/Historic Site Observation			
Paleontology	Paleontology Reports	Paleontology Site Observation			
Waste Management	Waste Management Reports	Waste Management Inspections			
Bond Release	Request for Bond Release Letter	Final MMRP Inspections Prior to Bond Release Letter			

C. SPECIFIC MMRP ISSUE AREA CONDITIONS/REQUIREMENTS

The specific measures provided in this recirculated EIR for issues determined to be significant are presented individually in each applicable section in Chapter 3 and duplicated below.

6.2 LAND USE

6.2.1 Impacts

Only potential land use impacts related to the Multi-Habitat Planning Area (MHPA) on-site would be significant but mitigable under CEQA for this project. MHPA land use adjacency mitigation measures are necessary for each of the build alternatives, as the project is located within and/or adjacent to the MHPA. These measures are to be used in addition to the "Biological Resource Protection During Construction MMRP" and with the direct habitat impact and species specific mitigation requirements specified in Section 3.12 of this recirculated EIR.

6.2.2 Mitigation Measures

Lan-1 The following measures shall be implemented as required by the City:

I. As specified in the mitigation measures in Section 3.1, prior to issuance of any construction permit or notice to proceed, DSD/ LDR, and/or MSCP staff shall verify the Applicant has accurately represented the project's design in or on the Construction Documents (CD's/CD's consist of Construction Plan Sets for Private Projects and Contract Specifications for Public Projects) are in conformance with the associated discretionary permit conditions and Exhibit "A," and also the City's Multi-Species Conservation Program (MSCP) Multi-Habitat Planning Area (MHPA) Land Use Adjacency Guidelines. The applicant shall provide an implementing plan and include references on/in CD's of the following:

A. **Grading/Land Development/MHPA Boundaries** - MHPA boundaries onsite and adjacent properties shall be delineated on the CDs. DSD Planning and/or MSCP staff shall ensure that all grading is included within the approved development/construction footprint, specifically manufactured slopes, disturbance, and development within or adjacent to the MHPA. For projects within or adjacent to the MHPA, all manufactured slopes associated with site development shall be included within the development footprint.

B. Drainage - All new and proposed parking lots, staging areas, and developed areas in and adjacent to the MHPA shall be designed so they do not drain directly into the MHPA. All staging and developed/paved areas must prevent the release of toxins, chemicals, petroleum products, exotic plant materials prior to release by incorporating the use of filtration devices, planted swales and/or planted detention/desiltation basins, or other approved temporary and permanent methods that are designed to minimize negative impacts, such as excessive water and toxins into the ecosystems of the MHPA.

C. **Toxics/Project Staging Areas/Equipment Storage** - Projects that use chemicals or generate by-products such as pesticides, herbicides, and animal waste, and other substances that are potentially toxic or impactive to native habitats/flora/fauna (including water) shall incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA. No trash, oil, parking, or other construction/development-related material/activities shall be allowed outside any approved construction limits. Provide a note in/on the CD's that states: "All construction related activity that may have potential for leakage or intrusion shall be monitored by the Qualified Biologist/Owners Representative or Resident Engineer to ensure there is no impact to the MHPA."

D. **Lighting** - Lighting within or adjacent to the MHPA shall be directed away/shielded from the MHPA, or limited to the immediate area and be subject to City Outdoor Lighting Regulations per LDC Section 142.0740.

E. **Barriers** – Construction and new development within or adjacent to the MHPA shall be required to provide barriers (e.g., non-invasive vegetation; rocks/boulders; 6-foot high, vinyl-coated chain link or equivalent fences/walls; and/or signage) along the MHPA boundaries to direct public access to

appropriate locations, reduce domestic animal predation, protect wildlife in the preserve, and provide adequate noise reduction where needed.

F. **Invasives-** No invasive non-native plant species shall be introduced into areas within or adjacent to the MHPA.

G. Noise - Due to the site's location adjacent to or within the MHPA where the Qualified Biologist has identified potential nesting habitat for listed avian species, construction noise that exceeds the maximum levels allowed shall be avoided during the breeding seasons for the following: Least Bell's vireo (3/15-9/15). If construction is proposed during the breeding season for the species, USFWS protocol surveys shall be required in order to determine species presence/absence. If protocol surveys are not conducted in suitable habitat during the breeding season for the aforementioned listed species, presence shall be assumed with implementation of noise attenuation and biological monitoring.

When applicable (i.e., habitat is occupied or if presence of the covered species is assumed), adequate noise reduction measures shall be incorporated. These measures are provided in Section 3.12 of this recirculated EIR (see Mitigation Measures Bio-10 and Bio-13). In addition, habitat-based mitigation shall also be implemented for impacts to occupied least Bell's vireo habitat (see Mitigation Measures Bio-10 and Bio-13).

6.3 VISUAL/AESTHETICS

6.3.1 Impacts

All build alternatives would have significant aesthetic impacts from degradation of visual character. These impacts would be mitigable to below a level of significance under CEQA by the measures listed below. For the issue of views, all build alternatives would have significant view impacts from blocking a view corridor and blocking a view of a public resource. The view blockage would be due to the fencing needed on the outside of the cantilever equestrian trail on the west side of the bridge. This impact would not be mitigable to below a level of significance under CEQA.

The Road Capacity and Bicycle Safety alternatives would have significant neighborhood character and development feature impacts due to the retaining walls that would exceed 6 feet in height. These impacts would be mitigable to below a level of significance under CEQA by the measures listed below.

6.3.2 Mitigation Measures

The following measures shall be implemented to minimize visual/aesthetics impacts:

Vis-1 To mitigate impacts associated with Aesthetics issue 1a (change resulting from the removal of the vegetation that constitutes a visual resource), prior to bid opening/bid award, the Public Works Department shall submit a landscape plan to be verified as reviewed and approved by the LDR-Landscape and/or ADD Environmental designee prior to being incorporated into the plans and specifications. This study has assumed that a revegetation plan will be part of a formal mitigation measure related mostly to biological impacts and mitigations. To assure that Aesthetic Issue 1a, Changes to the Quality of Current Scenic Resources, is addressed, the following requirements must be

met: prior to bid opening/bid award, the Public Works Department shall submit a landscape plan to be verified as reviewed and approved by the LDR-Landscape and/or ADD Environmental designee prior to being incorporated into the plans and specifications. This program would require the preparation of a revegetation plan prepared by a landscape architect. The revegetation plan for the river vegetation disturbed by construction shall be conducted as addressed in Section 3.12.5. Monitoring and maintenance would be required for a 5-year period to assure that the visual quality change has been fully mitigated, although the vegetation is expected to establish for visual purposes within 3 years, which is a standard protocol for establishment purposes of a restored area. This mitigation measure applies to all build alternatives.

- **Vis-2** To mitigate impacts associated with Aesthetics issue 1c(1) (change resulting from the change in the character of the bridge and the change in scale associated with the heightened nature of the bridge and its abutments), prior to bid opening/bid award, the Public Works Department and LDR-Landscape or ADD shall verify that the bridge railing system was designed to integrate the concrete barrier requirements of a K-rail with those commonly associated with a wood rail barrier. The barrier shall include a steel backed wood-appearing faced railing barrier. The railing shall have a dominant horizontal look and be painted white to match the existing rails. These treatments shall be extended down the roadway and substitute standard steel barriers with wood-appearing rail barriers. This mitigation measure applies to all build alternatives. An Optional Type ST-40 railing approved by Caltrans would be more consistent with the existing rural character and would allow for higher visibility through the railing, especially as seen from the roadway.
- Vis-3 To mitigate impacts associated with Aesthetics issue 1c(3) (change resulting from the removal of visual resources that make up the current visual character of an important public view, specifically the Polo Fields as seen from the existing and proposed bridge), prior to bid opening/bid award, the Public Works Department shall submit to LDR-Landscape and ADD for review and approval a landscape plan that has been incorporated into the plans and specifications. This program would require the preparation of a revegetation plan prepared by a landscape architect. As mitigation for the grove of trees removed at the southern end of the drainage ditch parallel to El Camino Real, in order to provide a visually comparable tree massing, the Eucalyptus tree grove (assumed to be 12 trees) and the Sycamore grove (assumed to be three trees) are proposed to be replaced at a 3:1 ratio (based on the mature size of the trees removed) utilizing varying container sizes up to 36-inch box trees for a total of 45 new trees. These trees are proposed to all be sycamore, even though many of the existing trees are eucalyptus. They shall be planted in a grove-like arrangement near the river, on each side of the bridge abutment, in a pattern that emulates a naturalized condition. In order to provide a visually comparable tree massing, the row of trees along the fence (assumed to be 30) are proposed to be replaced at a 3:1 ratio for a total of 90 new 24-inch box trees. These trees are proposed be planted as part of the parkway planter area (25-35 feet on center). The parkway trees to replace the row trees would be planted in a clustered, informal manner in accordance with City landscaping guidance. The fence itself is proposed to be reconstructed on each side of the new alignment. The entry gate into the Polo Fields is also proposed be replaced at the new entry to the Polo Fields. This mitigation measure applies to the Central Alignment, Eastern Alignment, Roundabout, and Lower Elevation alternatives.
- Vis-4 To mitigate impacts associated with Aesthetics issue 1c(4), Neighborhood Character issue 3a, and Development Features issue 4c (impacts associated with large-scale walls

associated with the Road Capacity and Bicycle Safety alternatives), prior to bid opening/bid award, the Public Works Department shall submit to LDR-Environmental, LDR-Landscape, and ADD plans that incorporate the use of colored and textured concrete or alternating split face block with integral color for the retaining wall, depending on the material selected for the wall construction. In addition, prior to bid opening/bid award, the Public Works Department shall submit to LDR-Landscape and ADD a landscape plan prepared by a Landscape Architect that includes the use of vegetation placed in front of the wall, consisting of approved City trees and shrubs. This mitigation measure applies to the Road Capacity and Bicycle Safety alternatives only.

6.4 HISTORICAL RESOURCES

6.4.1 Impacts

The records search and field reconnaissance surveys identified no significant historical resources within the APE. Based on the results of the surveys and record search, no unique resources as defined in Section 21083.2 of CEQA would be impacted with this project. However, because there is the possibility for buried resources, there is a potential for significant impacts, which necessitates construction monitoring.

6.4.2 Mitigation Measures

Although no cultural resources identified within the Area of Potential Effect (APE) are considered significant, construction monitoring by a qualified archaeologist and a Native American is required to address potential impacts to buried cultural resources in the alluvial deposits within the project area. The monitoring program shall be conducted according to City guidelines as follows.

His-1 Due to the potential for buried cultural resources to be encountered on-site, a qualified archaeological monitor and a Native American monitor shall be present during project-related grading activities, including on the JPA Mitigation Site and the additional mitigation area identified for the Roundabout Alternative, should that alternative be selected. This shall include removal of existing pavement and concrete hardscaping such as walkways. The following measures shall be implemented:

I. Prior to Permit Issuance

- A. Entitlements Plan Check
 - 1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the Assistant Deputy Director (ADD) Environmental designee shall verify that the requirements for archaeological monitoring and Native American monitoring have been noted on the applicable construction documents through the plan check process.
- B. Letters of Qualification have been submitted to ADD
 - 1. The applicant shall submit a letter of verification to the Mitigation Monitoring Coordinator (MMC) identifying the Principal Investigator (PI) for the project and

the names of all persons involved in the archaeological monitoring program, as defined in the City of San Diego Historical Resources Guidelines (HRG). If applicable, individuals involved in the archaeological monitoring program must have completed the 40-hour HAZWOPER training with certification documentation.

- 2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the archaeological monitoring of the project meet the qualifications established in the HRG.
- 3. Prior to the start of work, the applicant must obtain written approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

- A. Verification of Records Search
 - 1. The PI shall provide verification to MMC that a site-specific records search (¼-mile radius) has been completed. Verification includes, but is not limited to, a copy of a confirmation letter from South Coastal Information Center, or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
 - 2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.
 - 3. The PI may submit a detailed letter to MMC requesting a reduction to the ¹/₄-mile radius.
- B. PI Shall Attend Precon Meetings
 - 1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, Native American consultant/monitor (where Native American resources may be impacted), Construction Manager (CM) and/or Grading Contractor, Resident Engineer (RE), Building Inspector (BI), if appropriate, and MMC. The qualified Archaeologist and Native American Monitor shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Archaeological Monitoring program with the Construction Manager and/or Grading Contractor.
 - a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM or BI, if appropriate, prior to the start of any work that requires monitoring.
 - 2. Identify Areas to be Monitored
 - a. Prior to the start of any work that requires monitoring, the PI shall submit an Archaeological Monitoring Exhibit (AME) (with verification that the AME has been reviewed and approved by the Native American consultant/monitor when Native American resources may be impacted) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to

be monitored including the delineation of grading/excavation limits.

- b. The AME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).
- 3. When Monitoring Will Occur
 - a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
 - b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate site conditions such as depth of excavation and/or site graded to bedrock, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

- A. Monitor(s) Shall be Present During Grading/Excavation/Trenching
 - 1. The Archaeological Monitor shall be present full-time during all soil disturbing and grading/excavation/trenching activities which could result in impacts to archaeological resources as identified on the AME. The CM is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances Occupational Safety and Health Administration safety requirements may necessitate modification of the AME.
 - 2. The Native American consultant/monitor shall determine the extent of their presence during soil disturbing and grading/excavation/trenching activities based on the AME and provide that information to the PI and MMC. If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop and the Discovery Notification Process detailed in Section III.B-C and IV.A-D shall commence.
 - 3. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition such as modern disturbance post-dating the previous grading/trenching activities, presence of fossil formations, or when native soils are encountered that may reduce or increase the potential for resources to be present.
 - 4. The archaeological and Native American consultant/monitor shall document field activity via the Consultant Site Visit Record (CSVR). The CSVRs shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (**Notification of Monitoring Completion**), and in the case of ANY discoveries. The RE shall forward copies to MMC.

- B. Discovery Notification Process
 - 1. In the event of a discovery, the Archaeological Monitor shall direct the contractor to temporarily divert all soil disturbing activities, including but not limited to digging, trenching, excavating or grading activities in the area of discovery and in the area reasonably suspected to overlay adjacent resources and immediately notify the RE or BI, as appropriate.
 - 2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
 - 3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or email with photos of the resource in context, if possible.
 - 4. No soil shall be exported off-site until a determination can be made regarding the significance of the resource specifically if Native American resources are encountered.
- C. Determination of Significance
 - 1. The PI and Native American consultant/monitor, where Native American resources are discovered shall evaluate the significance of the resource. If Human Remains are involved, follow protocol in Section IV below.
 - a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required.
 - b. If the resource is significant, the PI shall submit an Archaeological Data Recovery Program which has been reviewed by the Native American consultant/monitor, and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground-disturbing activities in the area of discovery will be allowed to resume. Note: If a unique archaeological site is also an historical resource as defined in CEQA, then the limits on the amount(s) that a project applicant may be required to pay to cover mitigation costs as indicated in CEQA Section 21083.2 shall not apply.
 - c. If the resource is not significant, the PI shall submit a letter to MMC indicating that artifacts will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that that no further work is required.

IV. Discovery of Human Remains

If human remains are discovered, work shall halt in that area and no soil shall be exported off-site until a determination can be made regarding the provenance of the human remains; and the following procedures as set forth in CEQA Section 15064.5(e), the California Public Resources Code (Sec. 5097.98) and State Health and Safety Code (Sec. 7050.5) shall be undertaken:

A. Notification

- 1. Archaeological Monitor shall notify the RE or BI as appropriate, MMC, and the PI, if the Monitor is not qualified as a PI. MMC will notify the appropriate Senior Planner in the EAS of the Development Services Department to assist with the discovery notification process.
- 2. The PI shall notify the Medical Examiner after consultation with the RE, either in person or via telephone.
- B. Isolate Discovery Site
 - 1. Work shall be directed away from the location of the discovery and any nearby area reasonably suspected to overlay adjacent human remains until a determination can be made by the Medical Examiner in consultation with the PI concerning the provenance of the remains.
 - 2. The Medical Examiner, in consultation with the PI, will determine the need for a field examination to determine the provenance.
 - 3. If a field examination is not warranted, the Medical Examiner will determine with input from the PI, if the remains are or are most likely to be of Native American origin.
- C. If Human Remains ARE determined to be Native American
 - 1. The Medical Examiner will notify the Native American Heritage Commission (NAHC) within 24 hours. By law, **ONLY** the Medical Examiner can make this call.
 - 2. NAHC will immediately identify the person or persons determined to be the Most Likely Descendent (MLD) and provide contact information.
 - 3. The MLD will contact the PI within 24 hours or sooner after the Medical Examiner has completed coordination, to begin the consultation process in accordance with CEQA Section 15064.5(e), the California Public Resources and Health & Safety Codes.
 - 4. The MLD will have 48 hours to make recommendations to the property owner or representative, for the treatment or disposition with proper dignity, of the human remains and associated grave goods.
 - 5. Disposition of Native American Human Remains will be determined between the MLD and the PI, and, if:
 - a. The NAHC is unable to identify the MLD, OR the MLD failed to make a recommendation within 48 hours after being notified by the Commission; OR;

- b. The landowner or authorized representative rejects the recommendation of the MLD and mediation in accordance with PRC 5097.94 (k) by the NAHC fails to provide measures acceptable to the landowner, THEN,
- c. In order to protect these sites, the Landowner shall do one or more of the following:
 - (1) Record the site with the NAHC;
 - (2) Record an open space or conservation easement on the site;
 - (3) Record a document with the County.
- d. Upon the discovery of multiple Native American human remains during a ground disturbing land development activity, the landowner may agree that additional conferral with descendants is necessary to consider culturally appropriate treatment of multiple Native American human remains. Culturally appropriate treatment of such a discovery may be ascertained from review of the site utilizing cultural and archaeological standards. Where the parties are unable to agree on the appropriate treatment measures the human remains and buried with Native American human remains shall be reinterred with appropriate dignity, pursuant to Section 5.c., above.
- D. If Human Remains are **NOT** Native American
 - 1. The PI shall contact the Medical Examiner and notify them of the historic era context of the burial.
 - 2. The Medical Examiner will determine the appropriate course of action with the PI and City staff (PRC 5097.98).
 - 3. If the remains are of historic origin, they shall be appropriately removed and conveyed to the San Diego Museum of Man for analysis. The decision for internment of the human remains shall be made in consultation with MMC, EAS, the applicant/landowner, any known descendant group, and the San Diego Museum of Man.

V. Night and/or Weekend Work

- A. If night and/or weekend work is included in the contract
 - 1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the preconstruction meeting.
 - 2. The following procedures shall be followed.
 - a. No Discoveries

In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSVR and submit to MMC via fax by 8 a.m. of the next business day.

b. Discoveries

All discoveries shall be processed and documented using the existing procedures detailed in Sections III - During Construction, and IV -

Discovery of Human Remains. Discovery of human remains shall always be treated as a significant discovery.

- c. Potentially Significant Discoveries
 If the PI determines that a potentially significant discovery has been made,
 the procedures detailed under Section III During Construction and IV Discovery of Human Remains shall be followed.
- d. The PI shall immediately contact MMC, or by 8:00 a.m. of the next business day to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.
- B. If night and/or weekend work becomes necessary during the course of construction
 - 1. The Construction Manager shall notify the RE, or BI, as appropriate, a minimum of 24 hours before the work is to begin.
 - 2. The RE, or BI, as appropriate, shall notify MMC immediately.
- C. All other procedures described above shall apply, as appropriate.

VI. Post Construction

- A. Preparation and Submittal of Draft Monitoring Report
 - 1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Historical Resources Guidelines (Appendix B/C) which describes the results, analysis, and conclusions of all phases of the Archaeological Monitoring Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring. It should be noted that if the PI is unable to submit the Draft Monitoring Report within the allotted 90-day timeframe resulting from delays with analysis, special study results or other complex issues, a schedule shall be submitted to MMC establishing agreed due dates and the provision for submittal of monthly status reports until this measure can be met.
 - a. For significant archaeological resources encountered during monitoring, the Archaeological Data Recovery Program shall be included in the Draft Monitoring Report.
 - b. Recording Sites with State of California Department of Parks and Recreation The PI shall be responsible for recording (on the appropriate State of California Department of Parks and Recreation forms-DPR 523 A/B) any significant or potentially significant resources encountered during the Archaeological Monitoring Program in accordance with the City's Historical Resources Guidelines, and submittal of such forms to the South Coastal Information Center with the Final Monitoring Report.
 - 2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.

- 3. The PI shall submit revised Draft Monitoring Report to MMC for approval.
- 4. MMC shall provide written verification to the PI of the approved report.
- 5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.
- B. Handling of Artifacts
 - 1. The PI shall be responsible for ensuring that all cultural remains collected are cleaned and catalogued.
 - 2. The PI shall be responsible for ensuring that all artifacts are analyzed to identify function and chronology as they relate to the history of the area; that faunal material is identified as to species; and that specialty studies are completed, as appropriate.
 - 3. The cost for curation is the responsibility of the property owner.
- C. Curation of artifacts: Accession Agreement and Acceptance Verification
 - 1. The PI shall be responsible for ensuring that all artifacts associated with the survey, testing and/or data recovery for this project are permanently curated with an appropriate institution. This shall be completed in consultation with MMC and the Native American representative, as applicable.
 - 2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.
 - 3. When applicable to the situation, the PI shall include written verification from the Native American consultant/monitor indicating that Native American resources were treated in accordance with state law and/or applicable agreements. If the resources were reinterred, verification shall be provided to show what protective measures were taken to ensure no further disturbance occurs in accordance with Section IV Discovery of Human Remains, Subsection 5.
- D. Final Monitoring Report(s)
 - 1. The PI shall submit one copy of the approved Final Monitoring Report to the RE or BI as appropriate, and one copy to MMC (even if negative), within 90 days after notification from MMC that the draft report has been approved.
 - 2. The RE shall, in no case, issue the Notice of Completion and/or release of the Performance Bond for grading until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

6.5 HYDROLOGY/WATER QUALITY

6.5.1 Impacts

Impacts in terms of changes to stream flow velocities were concluded to be significant because all of the build alternatives would slightly increase 100-year velocities in the river upstream (east) of the road and bridge. At one cross section upstream of the new bridge, velocities would increase from being borderline erosional (from 3 fps to 6 fps) to erosional (greater than 6 fps). Also, at several cross sections around the new bridge, velocities already in the erosional range (greater than 6 fps) in existing conditions would be faster in the 100-year flood event with the proposed project. These changes in 100-year flood velocities are concluded to be substantial. These impacts would be mitigable to below a level of significance under CEQA by the measures listed below.

In terms of water quality, all alternatives would comply with the City Water Quality Standards. However, impacts during construction were concluded to be significant for all build alternatives because additional Best Management Practices (BMPs) may be required by the permitting agencies to protect clapper rail and their habitat upstream of the bridge. These measures would be developed during negotiations for the permits, but negotiations cannot be held until the Draft EIR is completed and provided for public review. These impacts would be mitigable to below a level of significance under CEQA by the measures listed below.

6.5.2 Mitigation Measures

- **Hyd-1** The following measure will be incorporated into the project plans and specifications to mitigate impacts associated with the increase of 100-year velocities in the river to above erosional levels. Prior to bid opening/bid award, the Public Works Department shall verify that plans to provide buried bank protection along the northern bank of the river for 500 feet east of the new bridge have been incorporated into the project plans and specifications. The bank protection shall be designed in accordance with the following concept to prevent impacts to wetlands in the river: place a temporary construction fence/environmental fence at the point of the slope where the habitat line ends. On the upstream side, remove the slope, creating a notch that is back cut from the environmental fence to the desired elevation. Fill in and rebuild the slope, with buried riprap and/or matting, up to the necessary height. The construction zone would be from the trail edge on top down to the environmental habitat limit lower on the slope. The slope would be refilled and re-contoured and revegetated with native coastal sage scrub plant materials as directed by the permitting agencies. The existing trail shall be repaired to existing condition or better. A temporary trail would be provided so there would be no interruption in access during construction.
- **Hyd-2** To mitigate construction impacts associated with water quality, prior to bid opening/bid award, City staff shall verify that a Stormwater Pollution Prevention Plan (SWPPP) is incorporated into the construction specifications and plans, and that the SWPPP includes all conditions that may have been added by the permitting agencies to protect the endangered clapper rail upstream of the bridge. The SWPPP shall identify all construction BMP requirements required by the City of San Diego Storm Water Standards, January 14, 2011, in accordance with SWRCB NPDES General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities Order No. 2009-0009-DWQ NPDES No. CAS00002 (adopted September 2, 2009) and/or the most recent update. Both erosion and sediment control BMPs shall be

installed and maintained in addition to good housekeeping and site and materials management. Copies of the SWPPP shall be retained at the construction site and at City offices. Examples of Construction BMPs that may be included in the SWPPP are as follows:

- BMPs for physical and vegetation stabilization, such as geotextiles, mats, fiber blankets, hydraulic mulch, Bonded Fiber Matrix, and sprayed-on binders.
- BMPs for sediment control such as silt fencing, gravel bag barriers, and fiber rolls.
- BMPs for prevention of off-site sediment tracking, such as stabilized construction entrances/exits, corrugated steel panels, and dust control.
- BMPs for materials management, such as protecting stockpiles from wind and rain, covering and/or providing secondary containment of storage areas, and specifying precautions for materials handling.

6.6 PALEONTOLOGICAL RESOURCES

6.6.1 Impacts

Impacts to fossils could occur during earthwork activities at the northern and southern ends of the project, such as removal of existing roadway and digging of trenches for widened drainage channels or relocated utilities. The impacts would be direct and short-term, as potential for damage to paleontological resources would only occur during project construction. These impacts would be mitigable to below a level of significance under CEQA by the measures listed below.

6.6.2 Mitigation Measures

The following measures shall be implemented to minimize the impacts associated with the disturbance of a formation with the potential to contain fossils, a monitoring program shall be conducted according to City guidelines as specified in the mitigation measures in Section 3.9:

Pal-1 The Applicant shall implement the procedures outlined below as a condition of approval.

I. Prior to Permit Issuance

A. Entitlements Plan Check

- 1. Prior to issuance of any construction permits, including but not limited to, the first Grading Permit, Demolition Plans/Permits and Building Plans/Permits or a Notice to Proceed for Subdivisions, but prior to the first preconstruction meeting, whichever is applicable, the ADD Environmental designee shall verify that the requirements for Paleontological Monitoring have been noted on the appropriate construction documents.
- B. Letters of Qualification have been submitted to ADD
 - 1. The applicant shall submit a letter of verification to MMC identifying the PI for the project and the names of all persons involved in the paleontological monitoring program, as defined in the City Paleontology Guidelines.

- 2. MMC will provide a letter to the applicant confirming the qualifications of the PI and all persons involved in the paleontological monitoring of the project.
- 3. Prior to the start of work, the applicant shall obtain approval from MMC for any personnel changes associated with the monitoring program.

II. Prior to Start of Construction

- A. Verification of Records Search
 - 1. The PI shall provide verification to MMC that a site-specific records search has been completed. Verification includes, but is not limited to, a copy of a confirmation letter from San Diego Natural History Museum, other institution or, if the search was in-house, a letter of verification from the PI stating that the search was completed.
 - 2. The letter shall introduce any pertinent information concerning expectations and probabilities of discovery during trenching and/or grading activities.
- B. PI Shall Attend Precon Meetings
 - 1. Prior to beginning any work that requires monitoring; the Applicant shall arrange a Precon Meeting that shall include the PI, CM and/or Grading Contractor, RE, BI, if appropriate, and MMC. The qualified paleontologist shall attend any grading/excavation related Precon Meetings to make comments and/or suggestions concerning the Paleontological Monitoring program with the CM and/or Grading Contractor.
 - a. If the PI is unable to attend the Precon Meeting, the Applicant shall schedule a focused Precon Meeting with MMC, the PI, RE, CM, or BI, if appropriate, prior to the start of any work that requires monitoring.
 - 2. Identify Areas to be Monitored
 - a. Prior to the start of any work that requires monitoring, the PI shall submit a Paleontological Monitoring Exhibit (PME) based on the appropriate construction documents (reduced to 11x17) to MMC identifying the areas to be monitored, including the delineation of grading/excavation limits. The PME shall be based on the results of a site-specific records search as well as information regarding existing known soil conditions (native or formation).
 - 3. When Monitoring Will Occur
 - a. Prior to the start of any work, the PI shall also submit a construction schedule to MMC through the RE indicating when and where monitoring will occur.
 - b. The PI may submit a detailed letter to MMC prior to the start of work or during construction requesting a modification to the monitoring program. This request shall be based on relevant information such as review of final construction documents which indicate conditions such as depth of excavation and/or site graded to bedrock, presence or absence of fossil resources, etc., which may reduce or increase the potential for resources to be present.

III. During Construction

- A. Monitor Shall be Present During Grading/Excavation/Trenching
 - 1. The monitor shall be present full time during grading/excavation/trenching activities as identified on the PME that could result in impacts to formations with high and moderate resource sensitivity. The Construction Manager is responsible for notifying the RE, PI, and MMC of changes to any construction activities such as in the case of a potential safety concern within the area being monitored. In certain circumstances, Occupational Safety and Health Administration safety requirements may necessitate modification of the PME.
 - 2. The PI may submit a detailed letter to MMC during construction requesting a modification to the monitoring program when a field condition, such as trenching activities, does not encounter formational soils as previously assumed, and/or when unique/unusual fossils are encountered, which may reduce or increase the potential for resources to be present.
 - 3. The monitor shall document field activity via the CSVR. The CSVR's shall be faxed by the CM to the RE the first day of monitoring, the last day of monitoring, monthly (Notification of Monitoring Completion), and in the case of ANY discoveries. The RE shall forward copies to MMC.
- B. Discovery Notification Process
 - 1. In the event of a discovery, the Paleontological Monitor shall direct the contractor to temporarily divert trenching activities in the area of discovery and immediately notify the RE or BI, as appropriate.
 - 2. The Monitor shall immediately notify the PI (unless Monitor is the PI) of the discovery.
 - 3. The PI shall immediately notify MMC by phone of the discovery, and shall also submit written documentation to MMC within 24 hours by fax or e-mail with photos of the resource in context, if possible.
- C. Determination of Significance
 - 1. The PI shall evaluate the significance of the resource.
 - a. The PI shall immediately notify MMC by phone to discuss significance determination and shall also submit a letter to MMC indicating whether additional mitigation is required. The determination of significance for fossil discoveries shall be at the discretion of the PI.
 - b. If the resource is significant, the PI shall submit a Paleontological Recovery Program and obtain written approval from MMC. Impacts to significant resources must be mitigated before ground disturbing activities in the area of discovery will be allowed to resume.
 - c. If the resource is not significant (e.g., small pieces of broken common shell fragments or other scattered common fossils), the PI shall notify the RE, or BI as appropriate, that a non-significant discovery has been made. The

paleontologist shall continue to monitor the area without notification to MMC unless a significant resource is encountered.

d. The PI shall submit a letter to MMC indicating that fossil resources will be collected, curated, and documented in the Final Monitoring Report. The letter shall also indicate that no further work is required.

IV. Night and/or Weekend Work

- A. If night and/or weekend work is included in the contract:
 - 1. When night and/or weekend work is included in the contract package, the extent and timing shall be presented and discussed at the Preconstruction Meeting.
 - 2. The following procedures shall be followed.
 - a. No Discoveries

In the event that no discoveries were encountered during night and/or weekend work, the PI shall record the information on the CSVR and submit to MMC via fax by 8 A.M. on the next business day.

b. Discoveries

All discoveries shall be processed and documented using the existing procedures detailed in Section III - During Construction.

- c. Potentially Significant Discoveries If the PI determines that a potentially significant discovery has been made, the procedures detailed under Section III - During Construction shall be followed.
- d. The PI shall immediately contact MMC, or by 8 A.M. on the next business day, to report and discuss the findings as indicated in Section III-B, unless other specific arrangements have been made.
- B. If night work becomes necessary during the course of construction:
 - 1. The CM shall notify the RE, or BI as appropriate, a minimum of 24 hours before the work is to begin.
 - 2. The RE or BI, as appropriate, shall notify MMC immediately.
- C. All other procedures described above shall apply, as appropriate.

V. Post Construction

- A. Preparation and Submittal of Draft Monitoring Report
 - 1. The PI shall submit two copies of the Draft Monitoring Report (even if negative), prepared in accordance with the Paleontological Guidelines which describes the results, analysis, and conclusions of all phases of the Paleontological Monitoring

Program (with appropriate graphics) to MMC for review and approval within 90 days following the completion of monitoring.

- a. For significant paleontological resources encountered during monitoring, the Paleontological Recovery Program shall be included in the Draft Monitoring Report.
- b. Recording Sites with the San Diego Natural History Museum The PI shall be responsible for recording (on the appropriate forms) any significant or potentially significant fossil resources encountered during the Paleontological Monitoring Program in accordance with the City's Paleontological Guidelines, and submittal of such forms to the San Diego Natural History Museum with the Final Monitoring Report.
- 2. MMC shall return the Draft Monitoring Report to the PI for revision or, for preparation of the Final Report.
- 3. The PI shall submit revised Draft Monitoring Report to MMC for approval.
- 4. MMC shall provide written verification to the PI of the approved report.
- 5. MMC shall notify the RE or BI, as appropriate, of receipt of all Draft Monitoring Report submittals and approvals.
- B. Handling of Fossil Remains
 - 1. The PI shall be responsible for ensuring that all fossil remains collected are cleaned and cataloged.
 - 2. The PI shall be responsible for ensuring that all fossil remains are analyzed to identify function and chronology as they relate to the geologic history of the area, that faunal material is identified as to species, and that specialty studies are completed, as appropriate.
- C. Curation of Fossil Remains: Deed of Gift and Acceptance Verification
 - 1. The PI shall be responsible for ensuring that all fossil remains associated with the monitoring for this project are permanently curated with an appropriate institution.
 - 2. The PI shall include the Acceptance Verification from the curation institution in the Final Monitoring Report submitted to the RE or BI and MMC.
- D. Final Monitoring Report(s)
 - 1. The PI shall submit two copies of the Final Monitoring Report to MMC (even if negative) within 90 days after notification from MMC that the Draft Monitoring Report has been approved.
 - 2. The RE shall, in no case, issue the Notice of Completion until receiving a copy of the approved Final Monitoring Report from MMC which includes the Acceptance Verification from the curation institution.

6.7 BIOLOGICAL RESOURCES

6.7.1 Impacts

Potential impacts to species identified as a candidate, sensitive, or special status species would include direct impacts to the habitat of least Bell's vireo and the light-footed clapper rail. These impacts would be significant. Potential indirect impacts to sensitive and native wildlife species would also be significant. Significant impacts to Tier II Habitats would include direct impacts to disturbed Diegan coastal sage scrub with portions located both in and outside the MHPA. Project impacts to riparian scrub and coastal wetland habitats would be significant. The impact of potential introduction of invasive plant species into a natural open space area would be significant. These impacts would be mitigable to below a level of significance under CEQA by the measures listed below.

6.7.2 Mitigation Measures

6.7.2.1 Mitigation for Impacts to Vegetation Communities

Projects within the City of San Diego are required to avoid wetlands to the maximum extent possible (City of San Diego 2002). Where wetlands cannot be avoided, impacts must be minimized and mitigation provided to offset these impacts. The project involves the widening/replacement of a bridge that currently crosses over the San Dieguito River. Consequently, there are limitations to the measures that can be implemented to reduce and minimize impacts to wetlands. During project development, the width of the bridge was reduced to the minimum required to accomplish the purpose and need of the project. Thus, the current width of the four full roadway cross section alternatives has been reduced compared to widths reported in the draft EIR circulated in 2006.

Bio-1: Wetland Habitat Mitigation Measures. Mitigation for unavoidable impacts to sensitive wetland habitats would be accomplished by: (1) creating or restoring habitat of equal value/type in the watershed or vicinity of the project and (2) enhancing degraded wetland habitats in the project watershed/vicinity through the removal of exotic plant species. The City also requires that unavoidable wetland impacts within the Coastal Overlay Zone be mitigated in the Coastal Overlay Zone (City of San Diego 2002).

Implementation of a wetland creation/restoration/enhancement plan on the JPA Mitigation Site is the principal proposed mitigation for impacts to wetland communities. The conceptual restoration plan is fully described in Appendix K of the Natural Environment Study (Conceptual Mitigation Plan ["restoration plan"] for the El Camino Real Bridge/Road Widening Project dated April 2015). Prior to the start of road or bridge construction, a final restoration plan is required to be prepared. The El Camino Real restoration project (i.e. the JPA Mitigation Site) would be included with the 127-acre San Dieguito Lagoon W19 Restoration Project currently being developed by the San Diego Association of Governments (SANDAG). The final restoration plan would include all elements described in the conceptual restoration plan - Appendix K. Restoration of the JPA site would include approximately 20.4 acres of wetland habitat enhancement and creation, including enhancement of a 2.0-acre parcel of existing mulefat scrub/southern willow scrub habitat located in the San Dieguito River; creation of 3.0 acres of mulefat scrub/southern willow scrub habitat in the San Dieguito River; creation of 3.0 ac of mulefat scrub/southern willow scrub habitat in an area currently consisting of disturbed Diegan Coastal Sage Scrub- Baccharis dominated, tamarisk scrub, and disturbed habitat located south of the enhancement area; and creation of approximately 15.4 acres of freshwater marsh habitat, 12.5 acres of which would be protected by an earthen berm and weir. The freshwater marsh creation area currently consists primarily of disturbed Diegan Coastal Sage Scrub- Baccharis dominated, disturbed habitat, and small areas of alkali marsh and disturbed wetland. Specific requirements for each alternative are summarized in Section 3.12.5.1. The Roundabout Alternative would require additional acreage of wetland mitigation beyond the JPA Mitigation Site. Additional suitable mitigation opportunities exist within the project vicinity; therefore, additional off-site mitigation would be achievable for the Roundabout Alternative on a site owned by the City. Specific requirements for each alternative are summarized below.

<u>Western Alignment Alternative</u>. Mitigation requirements for impacts of this alternative to vegetation communities are listed in Table 3.12-8a. Mitigation for impacts to 4.07 acres of impacts to wetland habitats would require 15.0092 acres of mitigation. In addition, 2.22 acres of mitigation would be required for implementing the proposed restoration plan, for a total requirement of 17.23 acres. Because a total acreage of 20.4 acres would be available for mitigation, the total mitigation would exceed City requirements for road and bridge improvements by 3.17 acres.

<u>Central Alignment Alternative</u>. Mitigation requirements for impacts of this alternative to vegetation communities are listed in Table 3.12-8b. Mitigation for impacts to 4.6 ac of impacts to wetland habitats would require 16.98 acres of mitigation. In addition, 2.22 acres of mitigation would be required for implementing the proposed restoration plan, for a total requirement of 19.2 acres. Because a total acreage of 20.4 acres would be available for mitigation, the total mitigation would exceed City requirements for road and bridge improvements by 1.2 acres.

<u>Eastern Alignment Alternative</u>. Mitigation requirements for impacts of this alternative to vegetation communities are listed in Table 3.12-8c. Mitigation for impacts to 4.5751 acres of impacts to wetland habitats would require 17.496 acres of mitigation. In addition, 2.22 acres of mitigation would be required for implementing the proposed restoration plan, for a total requirement of 19.716 acres. Because a total acreage of 20.4 acres would be available for mitigation, the total mitigation would exceed City requirements for road and bridge improvements by 0.684 acre.

Roundabout Alternative. Mitigation requirements for impacts of this alternative to vegetation communities are listed in Table 3.12-8d. Mitigation for impacts to 6.4353 acres of impacts to wetland habitats would require 24.6672 acres of mitigation. In addition, 2.22 acres of mitigation would be required for implementing the proposed restoration plan, for a total requirement of 26.8872 acres. Because a total acreage of 20.4 acres would be available for mitigation, the total acreage needed for mitigation would exceed the size of the JPA Mitigation Site by 6.48 acres. The City of San Diego owns a parcel in Gonzales Canyon immediately south of the JPA Mitigation Site and south of El Camino Real that is considered suitable for mitigation through a combination of creation and enhancement on up to 10.8 acres. This site is part of a 33-acre Cityowned parcel (Assessor's Parcel Number [APN] 304-020-26) and is designated as open space within the City's MHPA. The City also identified an approximately 3-acre area on City-owned parcel southeast of San Dieguito Road and Fairbanks Ranch Country Club (APN 302-262-05) suitable for enhancement. A Memorandum of Understanding is in process should it become necessary to proceed with additional mitigation for the Roundabout Alternative. Additional information about wetland creation and enhancement for the Roundabout Alternative is presented in Chapter 4 of the NES.

<u>Road Capacity and Bicycle Safety Alternatives</u>. Mitigation requirements for impacts of either of these alternatives to vegetation communities are listed in Table 3.12-8e. Mitigation for impacts to 1.98 ac of impacts to wetland habitats would require 7.74 acres of mitigation. In addition, 2.22 acres of mitigation would be required for implementing the proposed restoration plan, for a total requirement of 9.964 acres. Because a total acreage of 20.4 acres would be available for mitigation, the total mitigation would exceed City requirements for road and bridge improvements by 10.44 acres.

Projected Mitigation Requirements for the Eastern Alignment with Fairbanks Ranch Mitigation Site Considered. Adjusted acres for road and bridge impacts within the Fairbanks Ranch mitigation area are projected to be approximately 1.7 acres if this mitigation site is implementation prior to the commencement of construction. Mitigation requirements for impacts of this alternative to vegetation communities with Fairbanks Ranch mitigation area considered are listed in Table 6-1 at the end of this section. Similar to the Roundabout Alternative, mitigation for impacts to wetland habitats would require additional offsite mitigation on up to 10.8 acres of a parcel in Gonzales Canyon immediately south of El Camino Real.

Bio-2: Upland Habitat Mitigation Measures. Impacts to sensitive upland habitats, including acreage of disturbed Diegan coastal sage scrub associated with road and bridge improvement and 14.33 acres disturbed Diegan coastal sage scrub habitats associated with the JPA Mitigation Site (conversion of uplands to wetlands), would be mitigated through purchase of credits from the City's Cornerstone Land Mitigation Bank (Marron Valley) using appropriate City tier and ratio. Implementation of this measure will require concurrence from the Wildlife Agencies per conditions of the Cornerstone Banking Agreement.

Bio-3: Additional Vegetation Communities Mitigation Measures.

The project footprint would_be demarcated prior to construction in order to avoid encroachment into surrounding sensitive areas. Furthermore, a qualified biologist would monitor construction activities for the duration of the project to ensure that practicable measures are being employed to avoid incidental disturbance of habitat outside of the project footprint.

6.7.2.2 Mitigation for Impacts to Sensitive Plant Species

Bio-4: General Measures. Prior to removal of vegetation, orange snow fencing would be installed to demarcate the project footprint in order to avoid encroachment into surrounding sensitive areas. Furthermore, a qualified biologist would monitor construction activities for the duration of the project to ensure that practicable measures are being employed to avoid incidental disturbance of special-status species outside of the project footprint. Measures for specific sensitive plant species are summarized below.

Bio-5: Palmer's Sagewort. Palmer's sagewort would be included in the plant palette used in the creation and enhancement of southern willow scrub/mule-fat scrub in the JPA Mitigation Site. Final success criteria for the JPA Mitigation Site will require the presence of Palmer's sagewort prior to final site signoff.

Bio-6: San Diego Sunflower. Habitat-based mitigation would be provided for impacts to disturbed Diegan coastal sage scrub, the vegetation community on site in which the San Diego sunflower is found, at a 1:1 ratio.

Bio-7: San Diego Marsh-Elder. Within the JPA Mitigation Site, San Diego marsh-elder occurring within areas to be enhanced would be flagged or fenced to ensure that these individuals are not removed by work crews and are instead incorporated into the enhancement areas. San Diego marsh-elder would be included in the plant palette used in the creation and enhancement of southern willow scrub/mulefat scrub in the JPA Mitigation Site. Final success criteria for the JPA Mitigation Site will require the presence of San Diego marsh-elder prior to final site signoff.

Bio-8: Southwestern Spiny Rush. Within the JPA Mitigation Site, southwestern spiny rush occurring within areas to be enhanced would be flagged or fenced to ensure that these individuals are not removed by work crews and are instead incorporated into the enhancement areas. Southwestern spiny rush would be included in the plant palette used in the creation of coastal freshwater marsh in the JPA Mitigation Site. Final success criteria for the JPA Mitigation Site will require the presence of southwestern spiny rush prior to final site signoff. Furthermore, habitat-based mitigation would be offered for impacts to coastal freshwater marsh and mulefat scrub supporting southwestern spiny rush.

6.7.2.3 Mitigation for Impacts to Sensitive Wildlife Species

Bio-9: General Mitigation Measures. Habitat-based mitigation would occur at mitigation ratios established by the City in the Biology Guidelines (City of San Diego 2002), including 4:1 for Clark's marsh wren habitat, 3:1 for yellow-breasted chat habitat, 4:1 for light-footed clapper rail habitat, and 3:1 for least Bell's vireo habitat.

On the JPA Mitigation Site, habitat-based mitigation for species that occupy upland habitats, such as white-tailed kite, would be accomplished at a 2:1 ratio through purchase of credits from Cornerstone Lands. Habitat-based mitigation for species that occupy disturbed, isolated wetland habitats on the JPA Mitigation Site would be provided through conversion to higher quality wetlands at a 1:1 ratio.

In order to avoid direct impacts to nesting birds, removal of vegetation for all areas, including bridge/road construction and earthwork required for the JPA mitigation site preparation, would occur outside of the breeding season for birds (typically defined as February 1 to September 15). Typically, if a preconstruction nesting bird survey determines that nesting birds do not occur in the vicinity of the site (typically 300 feet for passerine birds and 500 feet for raptors), removal of vegetation can occur within the breeding season for avian species. However, for this project, the presence of least Bell's vireo precludes the removal of vegetation around a 300-foot buffer from the edge of occupied habitat from February 1 through September 30. All areas of disturbed southern willow scrub occurring along the San Dieguito River are considered occupied by least Bell's vireo.

If vegetation removal is to occur from January to February 1, a preconstruction nesting bird survey for raptors and other early nesting species would be conducted. If a nest is found, methods consistent with the City's Biology Guidelines, the City's MSCP Subarea Plan and state and federal protocol would be implemented to avoid impacts. This would consist of a no-work buffer zone placed around the nest until the adults are no longer using it or the young have fledged. The specific buffer width would be determined by a qualified biologist at the time of discovery consistent with the City's Biology Guidelines, the City's MSCP Subarea Plan and state and federal protocol. According to the City of San Diego Biology Guidelines (City of San Diego 2002), for areas within the MHPA, a 900-foot buffer would be placed around any nesting site of a northern harrier.

Bio-10: Least Bell's Vireo Mitigation Measures. Habitat-based mitigation would be provided to compensate for impacts to occupied least Bell's vireo habitat. In the project area, potential least Bell's vireo habitat consists of disturbed southern willow scrub occurring in association with the San Dieguito River. To offset anticipated project impacts to this habitat, disturbed southern willow scrub would be created and enhanced at a ratio greater than 3:1. Mitigation for impacts to tamarisk scrub would also be provided because tamarisk scrub is situated adjacent to disturbed southern willow scrub and may be utilized as foraging habitat by least Bell's vireo. Mitigation would be accomplished through implementation of the conceptual restoration plan within the JPA Mitigation Site, which is in the San Dieguito River watershed.

Bio-11: Clapper Rail Mitigation Measures. Habitat-based mitigation would be provided for the loss of suitable/occupied light-footed clapper rail habitat. In the project area, potential light-footed clapper rail habitat consists of coastal freshwater marsh and riparian habitats within the San Dieguito River. To offset anticipated project impacts to this habitat, coastal freshwater marsh would be created or enhanced at the JPA Mitigation Site, within the San Dieguito River watershed, at a 4:1 ratio. Thus, the goal of "no net loss" of wetland habitat from the project would be achieved. Mitigation 4:1 ratios are based on the sensitivity of the light-footed clapper rail, as recommended by CDFW and USFWS in multi-agency coordination meetings held in 2005.

In order to further avoid and minimize impacts to light-footed clapper rail the following general and specific measures would be implemented:

I. General Clapper Rail Measures

- A. Staging and equipment storage areas, and equipment maintenance will be located outside of the river corridor and all potential habitat areas.
- B. A qualified biologist will train construction crews (including utility personnel) to avoid unnecessary impacts to the biological resources by briefing them on resource protection measures. The project biologist and crew must be familiar with the identification and life history/habits of light-footed clapper rail.
- C. Prior to the start of construction, a qualified project biologist will supervise installation of orange construction fencing or equivalent along the limits of disturbance within and surrounding sensitive habitats as shown on the approved construction plans. Temporary fencing will be removed after project completion.
- D. The project biologist will monitor all phases of construction to minimize impacts on sensitive species, check that wildlife is not entrapped, verify that the boundary fencing is maintained in good condition, and ensure that construction activities do not encroach into biologically sensitive areas beyond the approved limits of construction.
- E. A wildlife corridor will be maintained during all construction within the river corridor during non-breeding season. Should the berm option be exercised, the wildlife corridor will consist of a spanned low flow channel of the river, approximately 40 feet wide. Orange construction fencing will be installed parallel to the low flow channel to discourage wildlife from accessing the construction areas approved in the plans. The trestle option would provide for a wildlife corridor that maintains the current geometry of the river corridor with the exception of the rows of driven piles that would function similarly to the existing bridge support columns, i.e., would result in a series of passageways across the river.

- F. Construction lighting in upland areas will be the lowest illumination necessary, and directed away, or shielded from the river corridor.
- G. The project site will be kept as clean of debris as possible to avoid attracting predators of sensitive wildlife. All food-related trash items will be enclosed in sealed containers and regularly removed from the site.
- H. Pets of project personnel will not be allowed on the project site.
- I. Disposal or temporary placement of excess fill, brush, or other debris will not be allowed in Waters of the U.S. or within their banks.

II. Specific Clapper Rail Measures

- A. No construction will occur within the river corridor during the clapper rail breeding season (February 1 September 30).
- B. Noise from construction activities outside of the river corridor will not exceed 60 dBA (1-hour) at the river corridor (or ambient, whichever is greater) during the light-footed clapper rail breeding season. If the noise limit is exceeded, the noise will be reduced by using temporary noise measures such as plywood barriers, equipment mufflers, or sound blankets.
- C. Outside of the breeding season, construction in the river corridor will be limited to daylight hours. No temporary lighting will be installed for construction at night.
- D. Once the clapper rail breeding season has ended (i.e. on October 1), all vegetation within the approved limits of disturbance will be removed prior to the beginning of construction to eliminate the potential for rails to seek vegetative cover within the work area. The project biologist will monitor vegetation removal activities to avoid impacts to rails during this process. Should any rails be detected in the limits of disturbance, vegetation removal activities will be halted temporarily while by the project biologists flushes the rail(s) from the area to be cleared into existing emergent vegetation west and east of the bridge. As part of daily monitoring, the project biologist shall evaluate the response of the fully protected species that come near the project site and implement the appropriate response actions. Biological monitors will notify the construction manager of any activities so that the key personnel may be notified and apprised of the situation and the potential conflict can be resolved.
- E. A wildlife corridor will be maintained during all construction within the river corridor during non-breeding season to allow east/west movement by rails. For the berm option, the wildlife corridor would consist of a low flow channel of the river, approximately 40 feet wide. Orange construction fencing will be installed parallel to the low flow channel to discourage clapper rails from accessing the construction areas approved in the plans. The trestle option would provide a series of openings across the width of the river.
- F. These measures have been developed in an effort to prevent clapper rails from being injured or killed by construction activities within the fenced construction footprint by removing vegetation that might provide cover; fencing to discourage access by the clapper rail; and monitoring to determine the effectiveness of these measures. Should earthen berms be employed for access across the San Dieguito River, a minimum of one

40-foot-wide corridor opening will be provide via installation of a construction bridge to allow river flow and rails and other species to move east and west along the river corridor. Should the trestle option be employed, wildlife movement can occur between parallel rows of driven piles.

- G. The river corridor is defined as all water and wetland vegetation occurring between the banks of the river, similar to area delineated as being CDFW jurisdictional. Where those banks are steep and/or armored, such as the area immediately upstream of the existing bridge, this definition is more obvious. Where the banks are less steep and vegetation exists on the banks, this definition may be less obvious; however, once upland habitats or developed areas occur, these are considered outside of the corridor. Thus, the polo fields and golf course to the east of the bridge are not considered within the river corridor, nor are the Horse Park or fallow agricultural fields to the west of the bridge.
- H. Wetland regulations that require no-net-loss of wetlands would provide additional protection for this species. The proposed project conforms to the conditions of coverage established by the MSCP for this species because proposed mitigation would result in no-net-loss of wetlands. This species is covered by the MSCP because 93 percent of its potential habitat would be preserved under this plan. Although covered by the MSCP, the federal MSCP permit does not authorize harm or lethal take for the species. Also, light-footed clapper rail is a fully protected species; therefore, "take" of this species cannot be authorized by the state.

6.7.2.4 Mitigation for Invasive Species

Bio-12: Invasive Species Mitigation Measures. To ensure the project does not promote the introduction of invasive species to the surrounding undeveloped areas, construction equipment would be cleaned of mud or other debris that may contain invasive plants and/or seeds and would be inspected to reduce the potential of spreading noxious weeds before mobilizing to the site and before leaving the site, during the course of construction. Also, trucks with loads carrying vegetation would be covered, and vegetation materials removed from the site would be disposed of in accordance with applicable laws and regulations. In addition, invasive species will be monitored during the protracted construction period and removed or treated in an environmentally sound manner.

6.7.2.5 Additional Mitigation Measures

Bio-13: Mitigation, Monitoring and Reporting Conditions for Least Bell's Vireo. The following Mitigation, Monitoring and Reporting conditions are required by the City for potential impacts to habitats occupied by sensitive avian species. The measures for State Endangered/Federally Endangered least Bell's vireo, which is the only species applicable to the project, are provided below.

Prior to the preconstruction meeting, the City Manager (or appointed designee) shall verify that the following project requirements regarding the least Bell's vireo are shown on the construction plans:

I. NO CLEARING, GRUBBING, GRADING, OR OTHER CONSTRUCTION ACTIVITIES SHALL OCCUR BETWEEN MARCH 15 AND SEPTEMBER 15, THE BREEDING SEASON OF THE LEAST BELL'S VIREO, UNTIL THE FOLLOWING REQUIREMENTS HAVE BEEN MET TO THE SATISFACTION OF THE CITY MANAGER:

- A. A QUALIFIED BIOLOGIST (POSSESSING A VALID ENDANGERED SPECIES ACT SECTION 10(a)(1)(A) RECOVERY PERMIT) SHALL SURVEY THOSE WETLAND AREAS THAT WOULD BE SUBJECT TO CONSTRUCTION NOISE LEVELS EXCEEDING 60 DECIBELS [dB(A)] HOURLY AVERAGE FOR THE PRESENCE OF THE LEAST BELL'S VIREO. SURVEYS FOR THE THIS SPECIES SHALL BE CONDUCTED PURSUANT TO THE PROTOCOL SURVEY GUIDELINES ESTABLISHED BY THE U.S. FISH AND WILDLIFE SERVICE WITHIN THE BREEDING SEASON PRIOR TO THE COMMENCEMENT OF CONSTRUCTION. IF THE LEAST BELL'S VIREO IS PRESENT, THEN THE FOLLOWING CONDITIONS MUST BE MET:
 - 1. BETWEEN MARCH 15 AND SEPTEMBER 15, NO CLEARING, GRUBBING, OR GRADING OF OCCUPIED LEAST BELL'S VIREO HABITAT SHALL BE PERMITTED. AREAS RESTRICTED FROM SUCH ACTIVITIES SHALL BE STAKED OR FENCED UNDER THE SUPERVISION OF A QUALIFIED BIOLOGIST; <u>AND</u>
 - 2. BETWEEN MARCH 15 AND SEPTEMBER 15, NO CONSTRUCTION ACTIVITIES SHALL OCCUR WITHIN ANY PORTION OF THE SITE WHERE CONSTRUCTION ACTIVITIES WOULD RESULT IN NOISE LEVELS EXCEEDING 60 dB(A) HOURLY AVERAGE AT THE EDGE OF OCCUPIED LEAST BELL'S VIREO OR HABITAT. AN ANALYSIS SHOWING THAT NOISE GENERATED BY CONSTRUCTION ACTIVITIES WOULD NOT EXCEED 60 dB (A) HOURLY AVERAGE AT THE EDGE OF OCCUPIED HABITAT MUST BE COMPLETED BY A OUALIFIED ACOUSTICIAN (POSSESSING CURRENT NOISE ENGINEER LICENSE OR REGISTRATION WITH MONITORING NOISE LEVEL EXPERIENCE WITH LISTED ANIMAL SPECIES) AND APPROVED BY THE CITY MANAGER AT LEAST TWO WEEKS PRIOR TO THE COMMENCEMENT OF CONSTRUCTION ACTIVITIES. PRIOR TO THE COMMENCEMENT OF ANY OF CONSTRUCTION ACTIVITIES DURING THE BREEDING SEASON, AREAS RESTRICTED FROM SUCH ACTIVITIES SHALL BE STAKED OR FENCED UNDER THE SUPERVISION OF A QUALIFIED BIOLOGIST; OR
 - 3. AT LEAST TWO WEEKS PRIOR TO THE COMMENCEMENT OF CONSTRUCTION ACTIVITIES, UNDER THE DIRECTION OF A QUALIFIED ACOUSTICIAN, NOISE ATTENUATION MEASURES (e.g., BERMS, WALLS) SHALL BE IMPLEMENTED TO ENSURE THAT NOISE LEVELS RESULTING FROM CONSTRUCTION ACTIVITIES WILL NOT EXCEED 60 dB(A) HOURLY AVERAGE AT THE EDGE OF HABITAT OCCUPIED BY THE LEAST BELL'S VIREO. CONCURRENT WITH THE COMMENCEMENT OF CONSTRUCTION ACTIVITIES AND THE CONSTRUCTION OF NECESSARY NOISE ATTENUATION FACILITIES. NOISE MONITORING* SHALL BE CONDUCTED AT THE EDGE OF THE OCCUPIED HABITAT AREA TO ENSURE THAT NOISE LEVELS DO NOT EXCEED 60 dB (A) HOURLY AVERAGE. IF THE NOISE ATTENUATION TECHNIQUES IMPLEMENTED ARE DETERMINED TO BE INADEQUATE BY THE QUALIFIED ACOUSTICIAN OR BIOLOGIST, THEN THE ASSOCIATED CONSTRUCTION

ACTIVITIES SHALL CEASE UNTIL SUCH TIME THAT ADEQUATE NOISE ATTENUATION IS ACHIEVED OR UNTIL THE END OF THE BREEDING SEASON (SEPTEMBER 16).

* Construction noise monitoring shall continue to be monitored at least twice weekly on varying days, or more frequently depending on the construction activity, to verify that noise levels at the edge of occupied habitat are maintained below 60 dB (A) hourly average or to the ambient noise level if it already exceeds 60 dB (A) hourly average. If not, other measures shall be implemented in consultation with the biologist and the City Manager, as necessary, to reduce noise levels to below 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average or to the ambient noise level if it already exceeds 60 dB(A) hourly average. Such measures may include, but are not limited to, limitations on the placement of construction equipment and the simultaneous use of equipment.

- B. IF LEAST BELL'S VIREO ARE NOT DETECTED DURING THE PROTOCOL SURVEY, THE QUALIFIED BIOLOGIST SHALL SUBMIT SUBSTANTIAL EVIDENCE TO THE CITY MANAGER AND APPLICABLE RESOURCE AGENCIES WHICH DEMONSTRATES WHETHER OR NOT MITIGATION MEASURES SUCH AS NOISE WALLS ARE NECESSARY BETWEEN MARCH 15 AND SEPTEMBER 15 AS FOLLOWS:
 - 1. IF THIS EVIDENCE INDICATES THE POTENTIAL IS HIGH FOR LEAST BELL'S VIREO TO BE PRESENT BASED ON HISTORICAL RECORDS OR SITE CONDITIONS, THEN CONDITION A.III SHALL BE ADHERED TO AS SPECIFIED ABOVE.
 - 2. IF THIS EVIDENCE CONCLUDES THAT NO IMPACTS TO THIS SPECIES ARE ANTICIPATED, NO MITIGATION MEASURES WOULD BE NECESSARY.

Bio-14: Biological Resource Protection During Construction

The following general biological construction protection measures are used within the City of San Diego for protection of ESL, MHPA, ESA species, and CEQA related biological resources.

I. Prior to Construction

- A. **Biologist Verification** -The owner/permittee shall provide a letter to the City's Mitigation Monitoring Coordination (MMC) section stating that a Project Biologist (Qualified Biologist) as defined in the City of San Diego's Biological Guidelines (2012), has been retained to implement the project's biological monitoring program. The letter shall include the names and contact information of all persons involved in the biological monitoring of the project.
- B. **Preconstruction Meeting -** The Qualified Biologist shall attend the preconstruction meeting, discuss the project's biological monitoring program, and arrange to perform any follow up mitigation measures and reporting including site-specific monitoring, restoration or revegetation, and additional fauna/flora surveys/salvage.
- C. **Biological Documents -** The Qualified Biologist shall submit all required documentation to MMC verifying that any special mitigation reports including but not limited to, maps,

plans, surveys, survey timelines, or buffers are completed or scheduled per City Biology Guidelines, Multiple Species Conservation Program (MSCP), Environmentally Sensitive Lands Ordinance (ESL), project permit conditions; California Environmental Quality Act (CEQA); endangered species acts (ESAs); and/or other local, state or federal requirements.

- D. BCME -The Qualified Biologist shall present Biological Construction а Mitigation/Monitoring Exhibit (BCME) which includes the biological documents in C above. In addition, include: restoration/revegetation plans, plant salvage/relocation requirements (e.g., coastal cactus wren plant salvage, burrowing owl exclusions, etc.), avian or other wildlife surveys/survey schedules (including general avian nesting and USFWS protocol), timing of surveys, wetland buffers, avian construction avoidance areas/noise buffers/ barriers, other impact avoidance areas, and any subsequent requirements determined by the Qualified Biologist and the City ADD/MMC. The BCME shall include a site plan, written and graphic depiction of the project's biological mitigation/monitoring program, and a schedule. The BCME shall be approved by MMC and referenced in the construction documents.
- E. Avian Protection Requirements To avoid any direct impacts to raptors and/or any native/migratory birds, removal of habitat that supports active nests in the proposed area of disturbance should occur outside of the breeding season for these species (February 1 to September 15). If removal of habitat in the proposed area of disturbance must occur during the breeding season, the Qualified Biologist shall conduct a pre-construction survey to determine the presence or absence of nesting birds on the proposed area of disturbance. The pre-construction survey shall be conducted within 10 calendar days prior to the start of construction activities (including removal of vegetation). The applicant shall submit the results of the pre-construction survey to City DSD for review and approval prior to initiating any construction activities. If nesting birds are detected, a letter report or mitigation plan in conformance with the City's Biology Guidelines and applicable State and Federal Law (i.e. appropriate follow up surveys, monitoring schedules, construction and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that take of birds or eggs or disturbance of breeding activities is avoided. The report or mitigation plan shall be submitted to the City for review and approval and implemented to the satisfaction of the City. The City's MMC Section and Biologist shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction.
- F. **Resource Delineation** Prior to construction activities, the Qualified Biologist shall supervise the placement of orange construction fencing or equivalent along the limits of disturbance adjacent to sensitive biological habitats and verify compliance with any other project conditions as shown on the BCME. This phase shall include flagging plant specimens and delimiting buffers to protect sensitive biological resources (e.g., habitats/flora & fauna species, including nesting birds) during construction. Appropriate steps/care should be taken to minimize attraction of nest predators to the site.
- G. **Education** –Prior to commencement of construction activities, the Qualified Biologist shall meet with the owner/permittee or designee and the construction crew and conduct an on-site educational session regarding the need to avoid impacts outside of the approved construction area and to protect sensitive flora and fauna (e.g., explain the avian and wetland buffers, flag system for removal of invasive species or retention of sensitive plants, and clarify acceptable access routes/methods and staging areas, etc.).

II. During Construction

- A. **Monitoring** All construction (including access/staging areas) shall be restricted to areas previously identified, proposed for development/staging, or previously disturbed as shown on "Exhibit A" and/or the BCME. The Qualified Biologist shall monitor construction activities as needed to ensure that construction activities do not encroach into biologically sensitive areas, or cause other similar damage, and that the work plan has been amended to accommodate any sensitive species located during the preconstruction surveys. In addition, the Qualified Biologist shall document field activity via the Consultant Site Visit Record (CSVR). The CSVR shall be e-mailed to MMC on the 1st day of monitoring, the 1st week of each month, the last day of monitoring, and immediately in the case of any undocumented condition or discovery.
- B. **Subsequent Resource Identification -** The Qualified Biologist shall note/act to prevent any new disturbances to habitat, flora, and/or fauna onsite (e.g., flag plant specimens for avoidance during access, etc). If active nests or other previously unknown sensitive resources are detected, all project activities that directly impact the resource shall be delayed until species specific local, state or federal regulations have been determined and applied by the Qualified Biologist.

III. Post Construction Measures

A. In the event that impacts exceed previously allowed amounts, additional impacts shall be mitigated in accordance with City Biology Guidelines, ESL and MSCP, State CEQA, and other applicable local, state and federal law. The Qualified Biologist shall submit a final BCME/report to the satisfaction of the City ADD/MMC within 30 days of construction completion.

	Impacts	Mitigation	<u>Mitigation</u> <u>Requirement</u>			
Vegetation Community	(acres)	Ratio	(acres)			
Wetland impacts associated with road and bridge improvement						
Disturbed southern willow scrub (DSWS)	0.12	3:1	0.36			
Mulefat scrub (MFS)	0.29	3:1	0.87			
Disturbed mulefat scrub (DMFS)		<u>3:1</u>	0.75			
Disturbed wetland (DW)	0.07	2:1	0.14			
Tamarisk scrub		<u>2:1</u>	0.006			
Subtotal DSWS, MFS, MFS, DMFS, DW			<u>2.126</u>			
Coastal freshwater marsh (CFM)		<u>4:1</u>	<u>4.7684</u>			
Disturbed coastal freshwater marsh (DCFM)		<u>4:1</u>	<u>1.52</u>			
Subtotal CFM, CFM, DCFM			<u>6.2884</u>			
Disturbed southern coastal salt marsh (CSM)		<u>4:1</u>	<u>9.08</u>			
Subtotal CSM	2.27		<u>9.08</u>			
Subtotal wetland impacts associated with road and bridge improvement	4.5761		<u>17.4944</u>			
Wetland impacts associated with JPA Mitigation Site						
Disturbed southern willow scrub	0.07	<u>1:1</u>	0.07			
Alkali marsh	0.48	1:1	0.48			
Disturbed wetland	0.23	1:1	0.23			
Tamarisk scrub	1.22	1:1	1.22			
Tamarisk scrub (berm)	0.11	2:1	0.22			
Subtotal wetland impacts associated with JPA Mitigation Site	2.11	<u>1:1</u>	2.22			
Total wetland impacts and mitigation	6.6891		<u>19.7144</u>			
Upland impacts associated with road and bridge improvement						
Disturbed Diegan coastal sage scrub – coastal form	<u>0.44</u>	<u>1:1</u>	<u>0.44</u>			
Disturbed Diegan coastal sage scrub - Baccharis dominated	0.0002	<u>1:1</u>	0.0002			
Disturbed Land	<u>2.94</u>	<u>0:1</u>	<u>0.0</u>			
Eucalyptus woodland	<u>0.285</u>	<u>0:1</u>	<u>0.0</u>			
Ornamental	<u>0.49</u>	<u>0:1</u>	<u>0.0</u>			
Bare ground	<u>0.37</u>	<u>0:1</u>	<u>0.0</u>			
Urban/Developed	<u>8.44</u>	<u>0:1</u>	<u>0.0</u>			
Subtotal upland impacts associated with road and bridge improvement	<u>17.67</u>		<u>0.4402</u>			
Upland impacts associated with JPA Mitigation Site	1					
Disturbed Diegan coastal sage scrub – coastal form (berm)	<u>0.03</u>	<u>1:1</u>	<u>0.03</u>			
Disturbed Diegan coastal sage scrub – Baccharis dominated (berm)	<u>1.13</u>	<u>1:1</u>	<u>1.13</u>			
Disturbed Diegan coastal sage scrub – Baccharis dominated	<u>13.17</u>	<u>1:1</u>	<u>13.17</u>			
Disturbed Land	<u>3.41</u>	<u>0:0</u>	<u>0.0</u>			
Non-native grassland	<u>0.04</u> 17.81	<u>1:1</u>	0.04			
Subtotal upland impacts associated with JPA Mitigation Site			<u>14.37</u>			
Total upland impacts and mitigation			<u>14.8102</u>			
ORIGINAL TOTAL IMPACTS AND MITIGATION			<u>34.5246</u>			

<u>Table 6-1</u> <u>Projected Mitigation Requirements for the Eastern Alignment Alternative</u> <u>with Fairbanks Ranch Mitigation Area Considered</u>

<u>Table 6-1</u>					
Projected Mitigation Requirements for the Eastern Alignment Alternative					
with Fairbanks Ranch Mitigation Area Considered					

	Impacts	Mitigation	<u>Mitigation</u> Requirement		
Vegetation Community	<u>(acres)</u>	Ratio	(acres)		
ADJUSTED MITIGATION CALCULATION*					
Impacts outside Fairbanks Ranch Mitigation Site	<u>40.4691</u>	<u>0:1-4:1</u>	<u>30.1306</u> †		
Impact within Fairbanks Ranch Mitigation Site		<u>4:1</u>	<u>6.80</u>		
PROJECTED TOTAL IMPACTS AND MITIGATION*	<u>42.1691</u>		<u>36.9306</u>		
*The adjusted mitigation calculation assumes the following impacts fall within the boundary of the Fairbanks Ranch Mitigation Site: 0.29 acre mulefat scrub, 0.04 acre disturbed mulefat scrub, 0.80 acre coastal freshwater marsh, 0.04 acre disturbed coastal freshwater marsh, 0.06 acre disturbed Diegan coastal sage scrub – coastal form, 0.06 acre disturbed land, 0.22 acre eucalyptus woodland, and 0.18 acre urban/developed.					
[†] For the adjusted mitigation calculation, the impacts and associated mitigation for each of these vegetation categories were subtracted from the original road and bridge subtotals. Wetland and upland impacts required for the road and bridge were then re-calculated separately from wetland and upland impacts for the road and bridge that overlap with the Fairbanks Ranch mitigation site.					
Mitigation for road and bridge impacts was calculated at the ratios listed above. The adjusted wetland mitigation needed for road and bridge improvements subtotaled to 13.1604 acres; total wetland mitigation (including JPA mitigation site) was 15.3804 acres. The adjusted subtotal for upland impacts associated with road and bridge improvements was 0.3802; total upland mitigation (including JPA mitigation site) was 14.7502 acres. In total, project impacts outside of the Fairbanks Ranch mitigation site require mitigation of 30.1306 acres. Mitigation for project impacts that fall within the boundary of the Fairbanks Ranch mitigation site was calculated at a 4:1 ratio for a total of approximately 6.8 acres.					

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SECTION 8 INDIVIDUALS AND AGENCIES CONSULTED

The following table lists the principal individuals representing permitting agencies and stakeholders who were consulted in the preparation of the 2006 and Recirculated Draft EIR, in accordance with the City of San Diego Environmental Impact Report Guidelines (City of San Diego 2005).

Individual	Agency/Company	
Shawna Anderson		
	San Dieguito River Valley Joint Powers Authority	
Bruce April	Caltrans District 11	
Sally Brown	U.S. Fish and Wildlife Service	
Susan Carter	San Dieguito River Valley Joint Powers Authority	
Lisa Cathcart-Randall	Federal Highway Administration	
Bryant Chesney	National Marine Fisheries Service	
Susan DeSaddi	U. S. Army Corps of Engineers	
John DiGregoria	U. S. Fish and Wildlife Service	
Tim Dillingham	California Department of Fish and Wildlife	
Elizabeth Goldman	U.S. Environmental Protection Agency	
Stephanie Hall	U. S. Army Corps of Engineers	
Bob Hoffman	National Marine Fisheries Service	
Kevin Hovey	Caltrans District 11	
Dr. and Mrs. Hu	Property Owners	
Robert James	Caltrans District 11	
Donna Jones	Sheppard, Mullin, Richter & Hampton, Attorneys	
Jeff Lewis	Federal Highway Administration	
Ellen Lirley	California Coastal Commission	
Libby Lucas	California Department of Fish and Wildlife	
Michelle Matson	U.S. Army Corps of Engineers	
Mike Mosley	Mary's Tack and Feed	
Alan Monji	San Diego Regional Water Quality Control Board	
Cesar Perez	Federal Highway Administration	
Michael Porter	San Diego Regional Water Quality Control Board	
Jason Reynolds	Caltrans District 11	
Sherilyn Sarb	California Coastal Commission	
Sue Scatolini	Caltrans District 11	
Tamara Spear	California Department of Fish and Wildlife	
Stephanie Stoermer	Federal Highway Administration	
Samir Tanious	Southern California Edison	
Tony Tomera	Caltrans District 11	
Gary Vettese	Caltrans District 11	

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SECTION 9 CERTIFICATION PAGE

This document has been completed by the City of San Diego's Environmental Analysis Section under the direction of the Assistant Deputy Director of the Land Development Review Section of the Development Services Department and is based on independent analysis and determinations made pursuant to the San Diego Land Development Code Section 128.0103.

9.1 RECIRCULATED EIR

9.1.1 CEQA Lead Agency

City of San Diego Public Works Department, Engineering Branch (formerly Engineering and Capital Projects Department)

Brad Johnson, Senior Civil Engineer Jayna Straughn, Assistant Engineer

City of San Diego Development Services Department

Jeff Szymanski, Senior Planner Patrick Thomas, Assistant Engineering Geologist, LDR Geology Terre Lien, Senior Landscape Planner, LDR Landscaping Conan Murphy, Associate Planner, LDR Planning Review Jim Lundquist, Associate Traffic Engineer, LDR Transportation Development Morris Dye, Development Project Manager Lisa Wood, Senior Planner, Environmental Services Department Don Weston, Senior Civil Engineer, LDR Engineering Farah Mahzari, Associate Engineer, LDR Transportation Development Anita Eng, Biologist

City of San Diego Planning Department

Dan Monroe, Senior Planner Holly Smit-Kicklighter, Associate Planner, MSCP

9.1.2 Consultants

Hon Consulting

Katherine Hon, President Responsibilities: Document Preparation; Purpose and Need, Project Description, Land Use, Farmlands/Agricultural Lands, Public Utilities/Services, Paleontological Resources, Growth-Inducing Impacts, Cumulative Effects, Alternatives

RECON

Lisa Lind, Principal, Project Manager Responsibilities: Document Management Rob Hobbs, Senior Restoration Biologist Responsibilities: Biological Resources

Raquel Atik, Restoration Biologist Responsibilities: Biological Resources

William Maddux, Senior Noise Analyst Responsibilities: Noise, Air Quality, Greenhouse Gas Emissions

Jesse Fleming, Environmental Analyst Responsibilities: Air Quality, Greenhouse Gas Emissions

Karyl Palmer, Environmental Analyst Responsibilities: Greenhouse Gas Emissions

Frank McDermott, GIS Coordinator Responsibilities: GIS

Sean Bohac, GIS Specialist Responsibilities: GIS

Chris Nixon, GIS Specialist Responsibilities: GIS, Graphic Design

Jennifer Gutierrez, Production Specialist Responsibilities: Document Review

Ldn Consulting

Jeremy Louden, Principal Responsibilities: Noise

Rick Engineering

Dennis Bowling, Principal Responsibilities: Water Resources

Edgar Camerino, Project Engineer Responsibilities: Project Engineering

Joshua Reeves, Project Engineer Responsibilities: Project Engineering

Brendan Hastie, Project Engineer Responsibilities: Hydrology/Hydraulics

TY Lin International

Jim Rucker, Senior Bridge Engineer Responsibilities: Bridge Design Jeremy LaHaye, Bridge Engineer Responsibilities: Bridge Design

Wade Durant, Civil Engineer Responsibilities: Construction Methodology

Nordby Biological Consulting

Chris Nordby, Principal Biologist Responsibilities: Biological Resources

Tierra Environmental Services

Michael Baksh, Principal Anthropologist Responsibilities: Historical Resources, Native American Consultation

Chris Shaver, Project Archaeologist Responsibilities: Historical Resources

Urban Systems Associates

Andrew Schlaefli, Principal Responsibilities: Traffic/Circulation

Justin Schlaefli, Traffic Engineer Responsibilities: Traffic/Circulation

Jacob Swim, Project Manager Responsibilities: Traffic/Circulation

Ourston Roundabout Engineering, Inc.

Jedidiah Munroe, Engineer Responsibilities: Traffic/Circulation for Roundabout Alternative

Mark Lenters, Engineer Responsibilities: Traffic/Circulation for Roundabout Alternative

KTU+A

Mike Singleton, Principal Responsibilities: Visual/Aesthetics

Michael Johnston, Senior Designer Responsibilities: Visual/Aesthetics

Craig Richardson, Senior Planner/Designer Responsibilities: Visual/Aesthetics

ICF International

Erica Eidson, Associate Biologist Responsibilities: Biological Resources

9.2 2006 DRAFT EIR ONLY

9.2.1 City of San Diego

Richard Leja, Senior Civil Engineer Abi Palaseyed, Associate Civil Engineer Mark Weis, Project Engineer Allison Sherwood, Senior Planner Eliana Barreiros, Associate Planner Donna Clark, Associate Planner Chris Zirkle, Assistant Deputy Director/Environmental Review Manager

9.2.2 Consultants

Rick Engineering

Norman Arndt, Engineering Manager Responsibilities, Project Engineering

Chang Consultants

Howard H. Chang, Ph.D., Principal Responsibilities: Water Resources

Earth Tech

Keith Gallistel, Project Manager Responsibilities: Project Engineering

Jerry Wallenborn, GIS Manager Responsibilities: Project graphics

Nicholas Haigh, Project Designer Responsibilities: Project Engineering

Leanne Crow, Project Engineer Responsibilities: Hydraulics, Hazardous Materials

Tierra Environmental Services

Anita Eng, Project Biologist Responsibilities: Biological Resources

Monica Alfaro, Associate Biologist Responsibilities: Biological Resources Erica Alfaro, Associate Biologist Responsibilities: Biological Resources

Patrick McInnes, Project Archaeologist Responsibilities: Historical Resources

EDAW

James Kurtz, Noise and Air Quality Specialist Responsibilities: Noise and Air Quality

William Maddux, Noise and Air Quality Specialist Responsibilities: Noise and Air Quality

Ninyo & Moore

Erik Olsen, Geotechnical Engineer Responsibilities: Geology

Ronald D. Hallum, Senior Geologist Responsibilities: Geology

Gregory T Farrand, Principal Geologist Responsibilities: Geology This page is intentionally blank.

EL CAMINO REAL BRIDGE/ROAD WIDENING PROJECT

RECIRCULATED FINAL ENVIRONMENTAL IMPACT REPORT

APPENDICES

Project Number 2982

SCH No. 1999071104

Prepared for

City of San Diego

June 2016

Appendices

- A: Notice of Preparation
- B: 404 (b)(1) Guidelines Information
- C: Agency Correspondence
- D: Bridge Construction Methodology & Associated Noise Reduction Measures, and Biological & Hydraulic Impacts
- E: Letters of Comment on 2006 Draft EIR
- F: Review of Section 3.8 of EIR for El Camino Real Road and Bridge Widening Project, San Diego, California, Ninyo & Moore, December 6, 2012

Appendix A

Notice of Preparation



Gray Davis Governor

STATE OF CALIFORNIA Governor's Office of Planning and Research State Clearinghouse



Notice of Preparation

November 6, 2002

To: Reviewing Agencies

Re: El Camino Real Road/Bridge Widening SCH# 1999071104

Attached for your review and comment is the Notice of Preparation (NOP) for the El Camino Real Road/Bridge Widening draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Donna Clark City of San Diego 1222 First Ave. MS 501 San Diego, CA 92101

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Hecley Frank

Becky Frank Project Analyst, State Clearinghouse

Attachments cc: Lead Agency



Document Details Report State Clearinghouse Data Base

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SCH# Project Title Lead Agency	1999071104 El Camino Real Road/Bndge Widening San Diego, City of					
Турө	NOP Notice of Preparation					
Description	Widen a 0.5 mile section of El Camino Real between Via de la Valle and San Dieguito Road to a four-lane major road with curbs, gutters, pedestrian walkways, bike lanes, equestrian/pedestrian crossings, and landscpaed medians. The existing bridge would be replaced with a new structure and a portion of the river channel would be deepened and widened. The western portion of the site is within the Subarea II of the Future Urbanizing Area, and the eastern portion is in the Fairbanks Ranch Country Club Community Planning Area.					
Lead Agend	cy Contact					
Name	Donna Clark					
Agency	City of San Diego					
Phone	619-446-5387 Fax					
emall						
Address	1222 First Ave.					
	MS 501					
City	San Diego State CA Zlp 92101					
Project Loca	ation					
County	San Diego					
City	San Diego					
Region	·					
Cross Streets	Via De La Vaile & San Dieguito Road					
Parcel No.						
Township	14S Range 3W Section 6,7 Bese SBBM					
Proximity to):					
Highways	I-5					
Airports						
Ral/weys	x					
Waterways	San Dieguito River					
Schools						
Land Use	Existing two-lane road with and existing bridge.					
Project Issues	Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Geologic/Selsmic; Noise; Traffic/Clrculation; Vegetation; Water Quality; Wetland/Riparian; Wildlife; Other Issues					
Reviewing Agencies	Resources Agency; Department of Boating and Waterways; Department of Conservation; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Game, Region 5; Native American Heritage Commission; State Lands Commission; Caltrans, District 11; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 9					
Date Received	11/06/2002 Start of Review 11/06/2002 End of Review 12/05/2002					

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Resources Agency	Fish and Game	Colorado River Board Gerald R. Zimmerman	Dept. of Transportation 10 Torn Dumas District 10	State Water Resources Con. Board Greg Frantz
Resources Agency Nadell Gayou Dept. of Boating & Waterways Bill Curry California Coastal Commission Elizabeth A. Fuchs Dept. of Conservation Roseanne Taylor Dept. of Forestry & Fire Protection Allen Robertson Office of Historic Preservation Hans Kreutzberg Dept of Parks & Recreation B. Noah Tilghman Environmental Stewardship Section Reclamation Board Pam Bruner S.F. Bay Conservation &	 Fish and Game Dept. of Fish & Game Scott Flint Environmental Services Division Dept. of Fish & Game 1 Donald Koch Region 1 Dept. of Fish & Game 2 Banky Curtis Region 2 Dept. of Fish & Game 3 Robert Floerke Region 3 Dept. of Fish & Game 4 William Laudermilk Region 4 Dept. of Fish & Game 5 Don Chadwick Region 5, Habitat Conservation Program Dept. of Fish & Game 6 Gabrina Gatchel Region 6, Habitat Conservation Program 	 Colorado River Board Gerald R. Zhmmerman Tahoe Regional Planning Agency (TRPA) Lyn Barnett Office of Emergency Services John Rowden, Manager Delta Protection Commission Debby Eddy Santa Monica Mountains Conservancy Paul Edelman Dept. of Transportation 1 Mike Eagan District 1 Dept. of Transportation 2 Don Anderson District 2 Dept. of Transportation 3 	Dept. of Transportation 10 Tom Dumas	Board
Dev't. Comm. Steve McAdam Dept. of Water Resources Resources Agency Nadell Gayou	 Dept, of Fish & Game 6 I/M Tammy Allen Region 6, Inyo/Mono, Habitat Conservation Program Dept. of Fish & Game M Tom Napoli Marine Region 	Jeff Pulverman District 3 Dept. of Transportation 4 Jean Finney District 4 Dept. of Transportation 5 David Murray	Air Resources Board Airport Projects Jim Lemer Transportation Projects Kurt Karperos	RWQCB 5S Central Valley Region (5) RWQCB 5F Central Valley Region (5) Fresno Branch Office RWQCB 5R Central Valley Region (5)
Health & Welfare Wayne Hubbard Dept. of Health/Drinking Water Food & Agriculture Food & Agriculture Steve Shaffer Dept. of Food and Agriculture	Independent Commissions California Energy Commission Environmental Office Native American Heritage Comm. Debble Treadway Public Utilities Commission Ken Lewis State Lands Commission Betty Silva Governor's Office of Planning & Research State Clearinghouse Planner	 District 5 Dept. of Transportation 6 Marc Birnbaum District 6 Dept. of Transportation 7 Stephen J. Buswell District 7 Dept. of Transportation 8 Linda Grimes, District 8 Dept. of Transportation 9 Katy Walton District 9 	 Industrial Projects Mike Tollstrup California Integrated Waste Management Board Sue O'Leary State Water Resources Control Board Diane Edwards Division of Clean Water Programs 	Redding Branch Office RWQCB 6 Lahontan Region (6) Lahontan Region (6) Victorville Branch Office RWQCB 7 Colorado River Basin Region (7) RWQCB 8 Santa Ana Region (8) RWQCB 9 San Diego Region (9)

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NDV - 7 2002

THE CITY OF SAN DIEGO

Date: November 6, 2002

City of San Diego Development Services Department LAND DEVELOPMENT REVIEW DIVISION 1222 First Avenue Mail Station 501 San Diego, CA 92101 (619) 446-5460

REVISED

NOTICE OF PREPARATION OF A DRAFT JOINT ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL ASSESSMENT

THE CITY OF SAN DIEGO will prepare a joint Environmental Impact Report/Environmental Assessment (EIR/EA) in compliance with the California Environmental Quality Act (CEQA), Section 102 (2)(c) of the National Environmental Policy Act (NEPA) of 1969, and Council of Environmental Quality Guidelines (40 CFR, Part 1500) for the following project:

PROJECT: EL CAMINO REAL ROAD WIDENING/BRIDGE REPLACEMENT: CITY COUNCIL APPROVAL/COASTAL DEVELOPMENT PERMIT/SITE DEVELOPMENT PERMIT/CAPITAL IMPROVEMENT PROJECT NO. 52-479.0 (PTS No. 2982) to widen a 0.5 mile section of El Camino Real between Via de la Valle and San Dieguito Road to a four-lane major road with curbs, gutters, pedestrian walkways, bike lanes, equestrian/pedestrian crossings, and landscaped medians. The existing bridge would be replaced with a new structure and a portion of the river channel would be deepened and widened. The western portion of the site is within Subarea II of the Future Urbanizing Area, and the eastern portion is in the Fairbanks Ranch Country Club Community Planning Area. Legal Description: Site extends north and south through the center of Sections 6 and 7, Township 14 South, Range 3 West, San Bernardino Base Meridian. Applicant: City of San Diego Engineering and Capital Projects Department in partnership with the California Department of Transportation.

LDR NO.: 42-0351

SCH No. Pending

Based on an Initial Study, it appears that the project may result in significant environmental impacts in the following areas: Land Use, Transportation, Hydrology/Water Quality, Biological Resources, Historical/Unique Archaeological Resources, Geology/Seismicity/Soils, Paleontological Resources, Visual Quality, Noise, Air Quality, and Agricultural Resources.

For more information, or to provide comments on the scope and content of the draft EIR, contact the following person at the address above: Donna Clark, Associate Planner, (619) 446-5387.

Written comments on the scope and content of the draft EIR/EA must be sent to the above address by no later than 30 days after receipt of this notice.



Responsible agencies are requested to indicate their statutory responsibilities in connection with this project when responding.

Attachments: Scoping Letter

Distribution:

U.S. Government U. S. Department of Transportation (2) U. S. Army Corps of Engineers (16, 26) Environmental Protection Agency (19) U. S. Department of the Interior, Fish and Wildlife Service (23) U.S. Department of Agriculture (25) State of California Caltrans, District 11 (31) California Department of Fish and Game (32) California Department of Food and Agriculture (34) California Department of Parks and Recreation (40, 474) Office of Historic Preservation (41) Resources Agency (43) Regional Water Quality Control Board (44) State Clearinghouse (46) California Coastal Commission (47, 48) Native American Heritage Commission (56) 22nd District Agricultural Association (349, 411) County of San Diego San Diego County Agricultural Department (64) San Diego County Department of Planning and Land Use (68, 420) San Diego County Department of Public Works (70, 72) City of San Diego Councilmember Peters, District 1 Tom Story, Senior Policy Advisor, Mayor's Office (91) **Development Services Department** Library Department - Government Documents (81) Real Estate Assets Department (85) Historical Resources Board (87) Wetland Advisory Board (91A, 171) General Services (92) Gary Hess (352) Others City of Del Mar (96, 358,413) City of Solana Beach (105, 414) San Diego Transit Corporation (112) San Diego Gas and Electric Company (114) Metropolitan Transit Development Board (115) San Dieguito River Park Joint Powers Authority (116) Rancho Santa Ana Botanic Garden at Claremont (161) Environmental Law Society (164) Sierra Club (165, 165A) San Diego Earth Times (165B) San Diego Natural History Museum (166) San Diego Audubon Society (167) California Native Plant Society (170) Stuart Hurlbert (172) San Diego Regulatory Alert (174) The Center for Biological Diversity (176)

Citizens Coordinate for Century III (179) Endangered Habitats League (182) Dr. Florence Shipek (208) Dr. Lynne E. Christenson (208A) South Coastal Information Center (210) San Diego Historical Society (211) San Diego Archaeological Center (212) San Diego Natural History Museum (213) Save Our Heritage Organisation (214) Ron Christman (215) Louie Guassac (215A) San Diego County Archaeological Society, Inc. (218) National Trust for Historic Preservation (219) Native American Heritage Commission (222) Kumeyaay Cultural Repatriation Committee (225) Southern Diegueno Bands (225A through 225I) Northern Diegueno Bands (225J through 225L) Luiseno/Cupeno Bands (225M through 225Q) Cahuilla Band (225R) Carmel Valley Community Service Center (344A) Pardee Construction Company (345, 355) City Attorney of Del Mar (346) Brian Biamonte (348) Carmel Valley Community Planning Board (350) Carmel Mountain Conservancy (184,408, 476) San Dieguito Lagoon Committee (409) San Dieguito Planning Group (412) San Dieguito River Park CAC (415) Friends of San Dieguito River Valley (419, 421) San Dieguito River Valley and Conservancy (422) RVR PARC (423) Fairbanks Ranch Association (424) San Dieguito River Park JPA (425A) Torrey Pines Community Planning Group (469) Polo Plaza M. L. Mosley, Mary's Tack Shop San Diego Polo Club at Rancho Santa Fe Seltzer, Caplan, Wilkins, and McMahon Coastal Environments Southern California Edison Hu Family Trust/Angelica Insurance Co., Ltd. R.M. and E.A. Gain Plaza Partners All Creatures Investment Partners R.H. and A.T. Speck Boudreau Trust of 1990 Donald T. and Mary L. Meagher Jacqueline Winterer Anne Harvey Marvin Gerst Vicki Touchstone Jan Fuchs Richard Manning Stephenson, Worley, Garratt, Schwartz, and Prairie

George Saddic Lucy Ann Albert Professor T. C. Hu, UCSD Mitch Berner

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THE CITY OF SAN DIEGO

Updated and Reissued November 6, 2002

Mark M. Weis City of San Diego Transportation and Drainage Design Engineering and Capital Projects 1010 Second Avenue, Suite 1100, MS 611 San Diego, CA 92101

SUBJECT: SCOPE OF WORK FOR DRAFT ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL ASSESSMENT (EIR/EA) FOR THE EL CAMINO REAL ROAD WIDENING/BRIDGE REPLACEMENT PROJECT (LDR NO. 42-0351, PTS NO. 2982, SCH No. Pending).

Dear Mr. Weis:

Update: The Environmental Analysis Section (EAS) of the Land Development Review Division has conducted an Initial Study for the proposed widening of a portion of El Camino Real and the replacement of the bridge over the San Dieguito River. A letter outlining the scope of work for the draft Environmental Impact Report/Environmental Assessment was prepared and distributed on July 22, 1999. Subsequently, due to the adoption of the City of San Diego Land Development Code, the required discretionary actions have changed from a Resource Protection Ordinance (RPO) Permit to a Site Development Permit.

The project, which is proposed by the City of San Diego Engineering and Capital Projects' Transportation and Drainage Design Division, includes widening El Camino Real between Via de la Valle and San Dieguito Road, and replacing the existing bridge over the San Dieguito River with a new structure (See Figures 1 and 2). El Camino Real at this location is currently a twolane rural roadway without shoulders, divided median, or pedestrian walkways. The existing bridge, built in 1940, is approximately 340 feet long and 27 feet wide. The bridge piles are 30 feet long, and are set in sediments that could liquefy in a seismic event. The road at this location is subject to inundation by the 100-year flood. Although the bridge surface would not be inundated, the 100-year flood level would rise to the bottom of the bridge deck, so there is not adequate freeboard to allow debris to pass under the bridge.

The proposed project would widen the road to a four-lane major road, and add curbs, gutters, pedestrian walkways, bike lanes, equestrian/pedestrian crossings, and landscaped medians. The existing bridge would be replaced with a new structure. Construction is proposed to occur in phases, keeping the existing road and bridge open until the new eastern side is constructed, then diverting traffic to the new side while the road and bridge are replaced.



Development Services 1222 First Avenue, MS 501 • San Diego, CA 92101-4155 Tel (619) 446-5460 Page 2 Mark M. Weis November 6, 2002

Project goals and objectives include the following:

- Provide 100-year flood protection on road and bridge, and improve access during high flood events.
- Improve bridge to acceptable seismic safety standards.
- Improve traffic flow to acceptable levels.
- Improve public safety for drivers, bicyclists, pedestrians, and equestrians.
- Make the road and bridge consistent with approved policy documents for the area.
- Make the road and bridge consistent with regional recreational plans for the area.

Required discretionary actions include City of San Diego Approval of a Coastal Development Permit, Site Development Permit, and Capital Improvement Project No. 52-479.0; U.S. Army Corps of Engineers (ACOE) approval of an Individual 404 Permit; California Department of Fish and Game (CDGF) approval of a 1601 Streambed Alteration Agreement; Regional Water Quality Control Board (RWQCB) issuance of a 401 Water Quality Certification, California Coastal Commission (CCC) approval of a Coastal Development Permit and Coastal Consistency Determination, Federal Highways Administration (FHWA) approval of the programmatic Section 4(f) Evaluation, and, potentially, a Letter of Map Revision (LOMR) from the Federal Emergency Management Agency. FHWA approval of the project is also needed because federal Highway Bridge Replacement Rehabilitation (HBRR) funds are being requested for bridge construction.

Because of the federal involvement in the proposed project (i.e., a request for federal funds and the need for an ACOE Individual 404 permit), a joint Environmental Impact Report/Environmental Assessment (EIR/EA) will be prepared to satisfy the requirements of the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). The ACOE Individual 404 permit also triggers a requirement for implementation of the NEPA/404 Integration Process for Surface Transportation Projects in Arizona, California, and Nevada. The FHWA is the lead for the 404 Integration process, which will be facilitated by Caltrans.

The City of San Diego is the Lead Agency under CEQA in the preparation of the EIR/EA. The FHWA is the Lead Agency under NEPA, with Caltrans acting as FHWA's agent providing oversight. A minimum 45-day public review period will be provided for the draft EIR/EA.

The purpose of this letter is to identify the issues to be specifically addressed in the EIR/EA. Because there is a difference in the way the determination of "significance" is dealt with in CEQA versus NEPA, the EIR/EA should be prepared generally in accordance with the City's "Format for Environmental Impact Report Guidelines", except that any discussion of the significance of impacts should be provided in a separate chapter entitled "CEQA Significance". The issues to be addressed are discussed below. A Notice of Preparation will be distributed to Responsible Agencies and others who may have an interest in the project. Changes or additions to this scope of work may be required as a result of input received in response to the Notice of Preparation. Page 3 Mark M. Weis November 6, 2002

In conformance with the Integrated NEPA/404 Process, a letter must be prepared to develop preliminary agreement from the ACOE, EPA, U.S. Fish and Wildlife Service (USFWS), Caltrans, and FHWA on the overall project purpose and need, criteria for alternative selection, project alternatives to be evaluated in the environmental document, and level of agency involvement. The document's Purpose and Need statement must have written concurrence from the NEPA/404 signatories.

Please note that several of the reports required in the following pages must be prepared in conformance with FHWA, Caltrans, and City of San Diego guidelines. The methodologies specified by such guidelines may vary from agency to agency. If discrepancies arise from the directions provided in each agency's guidelines, please consult with EAS to ensure that the reports meet both CEQA and NEPA standards.

I. PROJECT DESCRIPTION

Discuss the need for, and goals of, the project. A clear, precise description of the project goals is an important tool in defining project alternatives. Describe all discretionary actions needed to implement the project, including all permits required from federal, state, and local agencies. Describe the major project features, including grading (cut and fill) and relocation of existing facilities. Describe any off-site activities necessary to construct the proposed project, including areas. Provide a background discussion on the Project Report and summarize the initial public outreach program.

II. ENVIRONMENTAL ISSUES

Land Use

Issue 1: How would the proposed project implement the goals, objectives, and recommendations of the City of San Diego Progress Guide and General Plan, the Framework Plan for the North City Future Urbanizing Area, and the City's adopted community plans and existing policies? Would the project be compatible with the surrounding existing and future planned land uses in the project vicinity?

Discuss how the project accomplishes or fails to implement the goals and objectives of the General Plan, the Future Urbanizing Area Framework Plan, the Fairbanks Ranch Country Club Specific Plan, and appropriate planning documents and policies for the San Dieguito River Valley. Include the issues of grading, erosion and siltation, and transportation. Assess the compatibility of the project with existing, planned, and proposed land uses in the surrounding communities. Identify conflicts with existing residences, businesses, or other land uses during project construction and operation. Identify any conflicts with established recreational, educational, religious, or scientific uses of the project area. Page 4 Mark M. Weis November 6, 2002

Issue 2: Would the project result in a conflict with the purpose and intent of any current planning process or adopted environmental plans or policies in the area?

The project location is within the boundaries of the focused planning area for the proposed San Dieguito River Valley Regional Open Space Park. Evaluate the project's consistency with the goals and objectives adopted for the planning area by the Joint Powers Authority (JPA). In addition, address the project's consistency with the adopted City of San Diego San Dieguito River Regional Park Plan.

Issue 3: Would the proposed project result in a conflict with the purpose and intent of the Environmentally Sensitive Lands (ESL) regulations of the Land Development Code (LDC)?

Upland and wetland biological resources, as well as, potentially important historic and prehistoric resources, which are protected by ESL, would be affected by project activities. Provide an analysis of the project's conformance with ESL. Any required approval of findings for alternative compliance should be fully addressed in this section. The analysis should address the preservation of designated or proposed open space areas and wildlife corridors. Discuss the project's conformance to City of San Diego design standards for features such as lane configuration, road design speed, sighting distance, and road grade. Note that the cumulative loss of wetlands is considered significant and unmitigated by the City of San Diego.

Issue 4: Would the proposed project affect recreational activities or plans for recreational areas on adjacent properties?

According to Title 23 (Highways) of the Code of Federal Regulation, the FHWA must not approve a project that "uses" land from a significant publicly owned public park, recreation area, or wildlife and waterfowl refuge, or any significant historic site unless a determination is made that there is not a feasible and prudent alternative to the use of the land, and the action includes all possible planning to minimize harm to the property resulting from such use.

There are several publicly owned recreational areas near the portion of El Camino Real proposed for widening. Show Park is owned by a State agency (22nd District Agricultural Association). The Polo Field is owned by the City of San Diego, as are the Open Space Preserve lands that extend south of the river to San Dieguito Road. In the future, multi-use recreational trails planned by the San Dieguito River Park JPA may cross on, under or near the bridge and road. Therefore, evaluation of potential impacts to these areas will be necessary. A Section 4(f) evaluation must be prepared if the lands are determined to be "used" by the project, through permanent incorporation into the transportation facility, temporary occupancy during construction, or indirect impacts. Early coordination with FHWA is required to identify any "use" of 4(f) resources and determine the appropriate level of evaluation and the level of review required (i.e., Department of the Interior or FHWA). The evaluation should also address the project's

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consistency with regional conservation efforts (see Issue 5 below). The 4(f) evaluation should be summarized in the text of the EIR/EA and included as an appendix.

The land use section of the EIR/EA should include an impact assessment and mitigation measures for recreational impacts. Identify where construction or operation of the project could disrupt existing or planned recreational uses for an extended period of time (i.e., for more than three months), and where the potential for enhancement of recreational opportunities exists (e.g., providing enhanced road crossing for equestrians at Show Park, and coordinating with the San Diequito River Park trails).

Issue 5: How is the project consistent with the region's Multiple Species . Conservation Program (MSCP) and the City of San Diego Subarea Plan?

Portions of the project alignment are within and/or adjacent to land identified in the City's MSCP Subarea Plan as Multiple Habitat Planning Area (MHPA). Is the project consistent with the specific guidelines for the Northern Area? Would any MSCP Subarea Plan-identified wildlife corridors be affected by project implementation? How would those portions of the alignment adjacent to the MHPA comply with the Northern Area Land Use Adjacency Guidelines in terms of land use, drainage, toxic substances, lighting, noise barriers, and invasive plant species? This section should identify any special conditions of coverage that may apply to the species affected by the project (a brief summary only is needed in the Land Use section). Refer the reader to the Biological Resources section of the EIR/EA for a detailed biological assessment. Describe the incorporation of applicable planning and land use adjacency guidelines into the project's mitigation proposal (e.g., lighting, signage, etc.). Summarize and refer to the Biological Resources section of the EIR/EA for a full discussion of mitigation measures for impacts to vegetation communities and covered species.

Traffic/Circulation

Issue 1: What direct and cumulative impacts would this project have on traffic circulation, traffic volume, and road capacity in the vicinity?

Future traffic (year 2015) on El Camino Real in the project area is projected to be 30,000 average daily trips. It is expected that this amount will increase through the horizon year 2020. Prepare a traffic study report in accordance with the EAS Significance Determination Guidelines and Transportation Development Section Traffic Guidelines for this roadway. This analysis should be included as an appendix and will form the basis of the traffic impact analysis section of the EIR/EA. The traffic consultant should coordinate with the City Transportation Development Section to determine the parameters of the traffic study and assessment of potential traffic impacts and benefits. This evaluation should consider impacts to existing roadways and intersections from: 1) additional, temporary construction traffic; 2) lane closures and road damage during construction; and 3) increased traffic from project operation. Evaluate existing, construction, and near-term traffic scenarios with the project implemented, and horizon Page 6 Mark M. Weis November 6, 2002

year (2020) conditions with the project. Analyze whether the response times of police, fire, or emergency medical services would be affected during construction.

Issue 2: What direct and cumulative impacts would the project have on the safety of pedestrians, bicyclists, and equestrians using facilities in the area crossed by the road during construction of the road and bridge, and during operation of the completed project?

Address the construction phasing and traffic control concepts for the project, and measures that would be taken to safely route pedestrians, bicyclists and equestrians while each side of the road and bridge are constructed. Analyze the project features that would be provided to enhance the safety of these users after the project is completed.

Hydrology/Water Quality

Issue 1: How would the proposed project affect the hydrology of the San Dieguito River? What features have been incorporated to protect the project components and surrounding land uses from inundation during a 100-year flood? What drainage facilities are proposed to control runoff?

The proposed project lies within the flood plain of the San Dieguito River. Provide a hydrology study which describes how the project would affect the velocity, water surface elevations, and flood patterns of the 100-year flood both upstream and downstream of the bridge. The study should be included in the appendices and summarized in the body of the EIR/EA. Discuss drainage from the wider road and bridge, and identify any additional facilities proposed to handle runoff. Include details such as location, ownership, and maintenance responsibilities for the recreated drainage channel parallel to El Camino Real. Discuss the requirement for an Executive Order 11988 Floodplain Finding and, if appropriate, the requirement to obtain an LOMR from FEMA.

Include a discussion of natural and beneficial floodplain values. Discuss the consistency of the project with the regulatory floodway. Evaluate and discuss practicable alternatives if it has been determined that there is a significant encroachment.

Issue 2: To what extent would the construction and ultimate development of the project affect the water quality of the San Dieguito River and Iagoon, as well as the ground water supply?

Discuss the creation of additional impervious surfaces along the wider road and bridge, and resulting urban runoff or concentration of urban pollutants from a wider road that would carry additional traffic. Discuss the potential for pollution from irrigation runoff with dissolved fertilizers and pesticides along the road landscaped parkway. Address the potential for construction-related and long-term erosion and/or siltation. Discuss Best Management Practices that would be incorporated into the construction plans to protect the river and lagoon from water quality impairment during construction of the road and bridge, especially during dredging operations. Address cumulative impacts, and note that Page 7 Mark M. Weis November 6, 2002

> cumulative downstream water quality impacts are considered significant and unmitigated by the City of San Diego.

Biological Resources

Issue 1: Would the proposed project result in impacts to important habitat or to sensitive upland and/or animal species?

Both upland and wetland biological resources would be affected by project implementation. Provide a detailed biological technical report, prepared by a qualified biologist in accordance with the City of San Diego's "Biology Guidelines" and Caltrans "Guidance for Consultants - Procedures for Completing the Natural Environmental Study and Related Biological Reports". The report should be included in the appendices and summarized in the environmental analysis section of the EIR/EA. The report should discuss the biological resources present on the site, including habitat type, predominant plant and animal species, known and expected sensitive, rare, proposed threatened or endangered species, and narrow endemic species as defined by the City of San Diego, CDFG, and the USFWS. Provide information for Caltrans to solicit the USFWS endangered, threatened, and proposed species list. Provide a wetland delineation and a waters determination for affected wetland and waters areas. Identify jurisdictional areas of the CDFG and the ACOE for affected wetland habitats. Discuss the requirement for an Executive Order 11990 Wetlands Finding.

Conduct a habitat evaluation for the Pacific pocket mouse, Belding's savannah sparrow, least Bell's vireo, and the Southwestern willow flycatcher. Conduct focused surveys, as appropriate, for federally listed endangered species. If field surveys confirm the presence of a listed species, informal consultation will be initiated with USFWS and the transportation engineer from FHWA, and will be facilitated by Caltrans. If formal consultation with the USFWS is required, a draft Biological Assessment will be submitted to Caltrans for review. Caltrans will submit the final Biological Assessment to FHWA, and FHWA will request formal consultation pursuant to Section 7 of the Endangered Species Act with the USFWS.

The report should contain a 200-foot scale vegetation map showing existing habitats and areas which support or could support sensitive species. The EIR/EA should describe the significance of the resources. Address the potential for indirect and cumulative impacts to any resources within, adjacent to, or downstream from the project area. Such impacts may include construction noise, lighting, and increased traffic noise.

The mitigation section should propose measures to avoid any identified impacts or reduce them to below a level of significance. Mitigation ratios for impacts to upland species and wetlands should be in accordance with those specified in the enclosed Biology Guidelines. Page 8 Mark M. Weis November 6, 2002

Issue 2: Would the proposed project interfere with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors?

The project proposes to excavate the southern river bank area to create a wider river upstream and downstream of the bridge. Identify and discuss potential impacts to MSCPdesignated wildlife corridors and the movement of fish and wildlife through this area and under the bridge.

Issue 3: Would the project affect the long-term conservation of biological resources?

Portions of the project area are within the City's Northern Area MHPA. The EIR/EA should address whether the project would affect the maintenance and enhancement of biological diversity in the region and the conservation of viable populations of endangered, threatened, and key sensitive species and their habitats. Discuss any potential lighting impacts that might occur to existing on-site or off-site habitat. Appropriate Land Use Adjacency Guidelines from the City of San Diego MSCP Subarea Plan should be included as mitigation measures.

Historical Resources

Issue 1: How would the proposed project affect historic and prehistoric resources in the Area of Potential Effect (APE)?

The coastal areas of San Diego County are known for intense and diverse prehistoric occupation and important archaeological resources. The county has been inhabited by various cultural groups spanning 10,000 years or more. Camp sites, villages, and artifacts have been recorded along the coast from Del Mar to Tijuana. Provide a Historic Property Survey Report and a historical resources technical report. All studies must be prepared by a qualified archaeologist, and must be consistent with the California Office of Historic Preservation's "Archaeological Resource Management Reports (ARMR): Recommended Contents and Format" and Caltrans "Guidance for Consultants - Procedures for the Protection of Historic Properties: The Section 106 Process" (1991). The report should include the results of the initial archaeological site survey and literature review already conducted for the proposed road widening area. Provide appropriate graphics, including a map of the APE. Complete additional field surveys, as appropriate, to address the potential direct, indirect, and cumulative impacts of all project components. Any newly discovered sites should be recorded at the San Diego Museum of Man and the South Coastal Information Center. For sites that are expected to be impacted by project implementation, a testing program should be conducted to determine site significance according to CEOA and ESL criteria. Evaluate sites for inclusion in the California Register of Historic Places. Because of the federal involvement in the project, sites must also be evaluated for eligibility for nomination to the National Register of Historic Places, per Section 106 of the National Historic Preservation Act. Include the report as an appendix. The records search results should be separately bound as a confidential

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appendix. The EIR/EA should summarize the results of the report and discuss the need for a research design and data recovery program to mitigate impacts on those sites that are determined to be significant. Discuss measures that will be implemented during construction to avoid, minimize, and mitigate impacts to important archaeological sites.

The bridge over the San Diego River was built over 45 years ago, and is therefore, potentially historically significant as defined by CEQA. Substantial modification or demolition of a significant historic structure would be considered a significant environmental impact under CEQA. Therefore, in addition to the above technical studies, provide a historic architectural survey report. The evaluation should be conducted by a qualified historian or architectural historian and should include the following components:

- consideration of the age, location, context, association with important persons or events, uniqueness and structural integrity of the bridge;
- the names of the architect, builder, and the year built, along with information regarding any significant contributions they made to the area;
- a brief analysis of the historical integrity of the immediate neighborhood and evaluation of any indirect impact the loss of the structure may have on the historical integrity of the surrounding neighborhood;
- consideration of the possibility of the site containing buried historical resources associated with the structure; and
- a one-mile record search for historical resources.

If it is determined that the bridge is not historically significant under CEQA and ESL, and not eligible for nomination to the National Register of Historic Places or the California Register of Historic Places, and that any indirect impact of the loss of the structure on the historical integrity of the surrounding neighborhood would be less than significant, the results of the evaluation may be submitted in a letter format along with a State of California Department of Parks and Recreation Primary Record Form (DPR 523A) and a Building, Structure, and Object Record Form (DPR 523B), complete with State Clearinghouse numbers.

If the bridge is determined to be historically significant, or if the loss of the structure would represent a significant impact on the historic fabric of the neighborhood, a complete historical report must be prepared in accordance with the above-referenced guidelines. The report should propose mitigation measures to reduce impacts to less than significant levels.

Please note that the above-referenced Section 106 process must be initiated before the draft environmental document may be released for public review. At a minimum, a Preliminary Finding of Effect must be made. The finding can be made only after the

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technical studies have been submitted to and reviewed by Caltrans, the State Historic Preservation Officer, and FHWA. This process may take approximately four months.

Issue 2: How would the proposed project affect resources with Native American values?

Conduct a Native American contact program to identify Traditional Cultural Properties and concerns in the area. Discuss the participation of Native Americans in monitoring of test excavations. Evaluate the potential significance of impacts to any resources with Native American values, and provide mitigation measures for a any significant impacts.

Geology/Seismicity/Soils

Issue 1: How would the proposed project affect or be affected by geologic, seismic, and soils conditions (including contamination)?

According to the City of San Diego's Seismic Safety Study (Map No. 42), the project site is assigned a geologic hazard rating of 32 (low potential for liquefaction; fluctuating groundwater; minor drainages). While this is not an adverse rating, one major component of the project is a seismic retrofit or replacement of the existing bridge structure. Provide a geologic reconnaissance in conformance with the City of San Diego's "Technical Guidelines for Geotechnical Reports". Include the report as an appendix and summarize the information in the body of the EIR/EA. Describe the geologic and subsurface conditions in the project area. Describe the general setting in terms of existing topography, geology, tectonics, and soil types. Document known seismic parameters for the project. Discuss the existing seismic hazards and unfavorable soil conditions, including ground shaking and liquefaction. Address potential erosion during construction and after implementation of the project, particularly for the widened river, new drainage channel, and road slopes.

Conduct an Initial Site Assessment which includes a Hazardous Materials Data Base Records Search for historical fills or incidents along effected areas of the road and river corridor. Utilize this information to evaluate the potential for soil contamination to affect the construction of any project components.

Paleontological Resources

Issue 1: How would the proposed project affect paleontological resources?

The northern- and southernmost portions of the project area are underlain by the Baypoint Formation. According to "Paleontological Resources, County of San Diego" (Thomas A. Demere and Stephen L. Walsh, Department of Paleontology, San Diego Natural History Museum, August 1994), this formation has produced large and diverse assemblages of well-preserved marine invertebrate fossils and rare vertebrate fossils, and is assigned a high resource sensitivity. Using the City of San Diego's "Paleontological Guidelines", Page 11 Mark M. Weis November 6, 2002

discuss the potential for project grading activities to impact fossil resources and identify mitigation measures for any significant impacts.

Visual Quality

Issue 1: How would the project affect the visual quality of the area, especially with regard to views from public roadways and public open space?

The project would alter the visual landscape along the road and the San Dieguito River. The new bridge would be higher and wider than the existing structure. Provide a graphic analysis in conformance with the FHWA's "Visual Assessment Guidelines." Include visual simulations of key visual impact points. Address the amount of contrast the project would have with the existing visual quality, view quality, landform quality, and community character. Include a discussion of visual impacts to users of the San Dieguito River Park. Describe compatibility of the lighting, landscaping, and other aesthetic themes that would be provided along the road and on the bridge with the existing rural character of the area. Describe measures to mitigate any potentially significant direct and/or cumulative visual impacts.

Noise

Issue 1: Would the surrounding uses experience noise levels that would exceed City of San Diego and Caltrans standards due to implementation of the project?

Future traffic in excess of 30,000 average daily trips and noise-generating land uses in the project area may expose sensitive receptors to noise levels in excess of allowable limits. Provide an acoustical analysis in conformance with the City of San Diego's "Acoustical Report Guidelines" and Caltrans "Noise Protocol". The noise analysis should be included in the appendices and summarized in the body of the EIR/EA. Include the following in the analysis: noise from construction of various project components (road, bridge, river widening, drainage channel), and noise from current and future (20 years) traffic and surrounding land uses. Describe the allowable noise level limits for construction activities and operation of the facilities. Identify surrounding uses that might be impacted in the short term and the long term, including any sensitive receptors. Where there is a potential for the project to exceed allowable limits, recommend measures to reduce the impact.

<u>Air Quality</u>

Issue 1: Would the proposed project affect the ability of the San Diego region to meet federal, state, and local air quality regulations?

Provide an air quality analysis that estimates project combustion emissions from construction equipment and construct vehicles, dust emissions from earthwork during construction, carbon monoxide emissions during construction (CO hot spots), and

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emissions from operation of the road and bridge. The analysis should be included as an appendix and summarized in the body of the EIR/EA. Prepare a discussion of Transportation Conformity of the project, as required by FHWA. Address cumulative air quality impacts.

Agricultural Resources

Issue 1: Would the proposed project result in the conversion of agricultural land to a nonagricultural use or impairment of the agricultural productivity of agricultural land?

Agricultural fields occur along portions of the project alignment. Therefore, evaluation of potential impacts to agricultural resources will be necessary. Describe existing farmlands and the consultation done to identify them. Farmland includes: 1) prime, 2) unique, 3) other than prime or unique that is of statewide importance, and 4) other than prime or unique that is of local importance. Where any of the four specified types of farmland could be directly or indirectly impacted by any alternative under consideration, summarize the results of early consultation with the Soil Conservation Service (SCS) and, as appropriate, State and local agriculture agencies. Where farmland would be impacted, include a map showing the location of all farmlands in the project impact area, discuss the impacts of the various alternatives and identify measures to avoid or reduce the impacts. Form AD 1006 (Farmland Conversion Impact Rating) should be processed, as appropriate, and a copy included as an appendix. Where the Land Evaluation and Site Assessment score (from Form AD 1006) is 160 points or greater, discuss alternatives to avoid farmland impacts. If avoidance is not possible, measures to minimize or reduce the impacts should be evaluated and, where appropriate, included in the analysis.

If other potentially significant issue areas arise during detailed environmental investigation of the project, consultation with this division is required to determine if these other areas need to be addressed in the EIR/EA. Should the project description be amended, an additional scope of work may be required. Furthermore, as the project design progresses and supplementary information becomes available, the EIR/EA may need to be expanded to include additional issue areas.

Mitigation measures should be clearly identified and discussed and their effectiveness assessed in each issue section of the EIR/EA. In addition, a monitoring and reporting program for each mitigation measure must be included. At a minimum, this program should identify: 1) the department responsible for the monitoring; 2) the monitoring and reporting schedule; and 3) the completion requirements. Mitigation measures and the monitoring and reporting program for each impact should also be contained (verbatim) in a separate, stand-alone document to be paper clipped to the back of the EIR/EA.

Page 13 Mark M. Weis November 6, 2002

A separate section of the EIR/EA should include a brief discussion of why certain areas were not considered to be potentially significant.

III. GROWTH INDUCEMENT

Evaluate the project potential to foster substantially increased economic or population growth, or the construction of additional housing in the surrounding area, either directly, indirectly, or cumulatively, based on the following questions:

- Are the road and bridge critical infrastructure in the chain of factors that support growth?
- What aspects of the project could remove obstacles to population growth?
- Would the project add an amenity that could accelerate growth in the vicinity?

IV. CUMULATIVE EFFECTS

Discuss the cumulative effects of the project in a separate section. The document should address the cumulative impacts of this project in combination with other planned and existing projects in the surrounding area. The discussion should address the potential cumulative effects related to land use, traffic/circulation, hydrology/water quality, biological resources, historical resources, visual quality/landform alteration, air quality, and agricultural resources.

V. MANDATORY DISCUSSION AREAS

In accordance with CEQA Guidelines Section 15126, the EIR/EA must include a discussion of the following issue areas:

- a. The relationship between local short-term uses of man's environment and the maintenance and enhancement of long term production.
- b. Any significant irreversible environmental changes which would be involved in the proposed action should it be implemented.

Page 14 Mark M. Weis November 6, 2002

VI. ALTERNATIVES

The EIR/EA should place major attention on reasonable alternatives which avoid or mitigate the project's significant impacts. These alternatives should be identified and discussed in detail, and should address all significant impacts. The alternatives analysis should be conducted in sufficient graphic and narrative detail to clearly assess the relative level of impacts and feasibility. Preceding the detailed alternatives analysis should be a section entitled "Alternatives Considered but Rejected." This section should include a discussion of preliminary alternatives that were considered but not analyzed in detail. The reason for rejection should be explained.

At a minimum, the following alternatives should be considered in the detailed alternative analysis.

A. <u>No Project</u>

The No Project alternative should address the effects of maintaining the current conditions of the road and the bridge. Discuss the impacts that would be avoided under this alternative. Discuss this alternative in relation to the project goals and objectives.

B. Reduced Project Alternative A

Discuss a reduced footprint for the project that could avoid impacts to the existing drainage channel parallel to El Camino Real. This alternative would, at a minimum, eliminate the parkway, pedestrian walkway, bicycle lanes, and landscaped median, but would still provide four traffic lanes. The bridge would be replaced and the road would be raised. Include a conceptual graphic reflecting the alternative. Identify and quantify the impacts that would be avoided/reduced under this alternative. Discuss this alternative in relation to the project goals and objectives.

C. <u>Reduced Project Alternative B</u>

Discuss a reduced footprint for the project that could avoid impacts to the existing drainage channel parallel to El Camino Real. This alternative would involve replacing the bridge and raising the road, but only providing two lanes as under the existing condition. Other amenities, such as bicycle lanes and a landscaped median would be included, although the parkway and pedestrian walkway would not. Include a conceptual graphic reflecting the alternative. Identify and quantify

Page 15 Mark M. Weis November 6, 2002

the impacts that would be avoided/reduced under this alternative. Discuss this alternative in relation to the project goals and objects.

D. Modified Project Location Alternative

Discuss a project with the road widened to four lanes to the west, which would avoid impacts to the existing drainage channel parallel to El Camino Real. This alternative would involve the full proposed widened footprint, but would require right-of-way from the 22nd District Agricultural Association and the private property landowners at the northern and southern ends of the project, at Via de la Valle and San Dieguito Road, respectively. Include a conceptual graphic reflecting the alternative. Describe the status of the existing bridge under this alternative. Identify and quantify the impacts that would be avoided/reduced under this alternative. Discuss this alternative in relation to the project goals and objectives.

If, during the environmental analysis process, other alternatives become apparent which would mitigate potential impacts, these should be discussed with EAS staff prior to including them in the EIR/EA. It is important to emphasize that the alternatives section of the EIR/EA should constitute a major part of the report. The timely processing of the environmental review will likely be dependent on the thoroughness of effort exhibited in the alternatives analysis.

The EIR/EA should be prepared in draft form by a consultant of your choice, based upon the scope of work determined by this office. It is important to note that timely processing of your project will be contingent in large part upon your selection of a well-qualified consultant. Prior to starting work on the EIR/EA, a meeting between the consultant and EAS will be required to discuss and clarify the scope of work.

Please contact Donna Clark of this office at (619) 446-5387 if you have any questions about the scope of the analysis presented in this letter or the environmental processing of the proposed project.

Sincerely,

Lawrence C. Monut

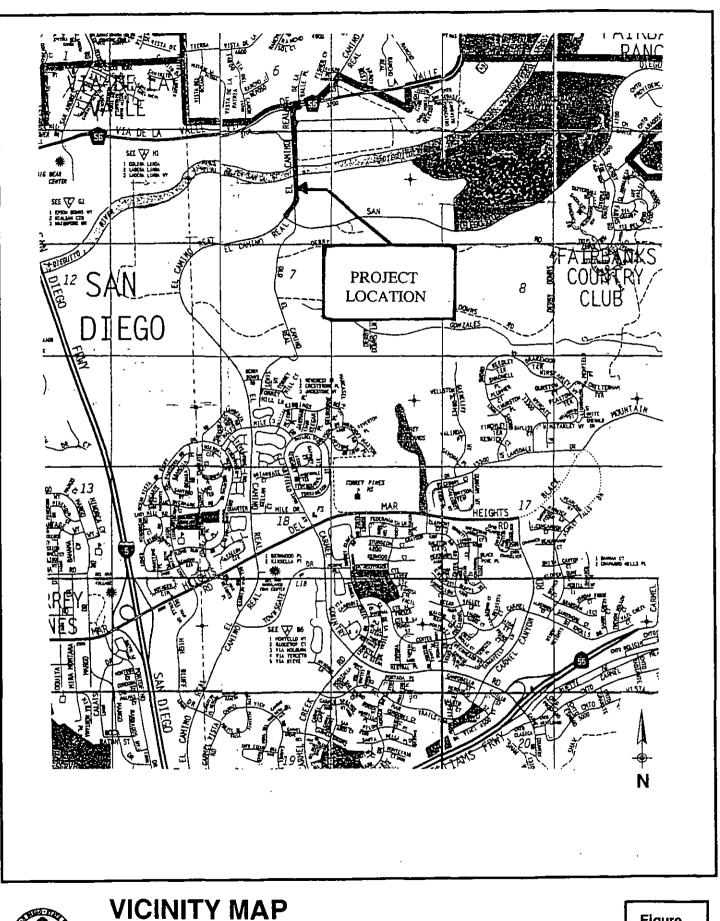
Lawrence C. Monserrate, Assistant Deputy Director Environmental Review Manager Development Services Department

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Attachments: Figure 1 (Vicinity Map) Figure 2 (Location Map)

cc:

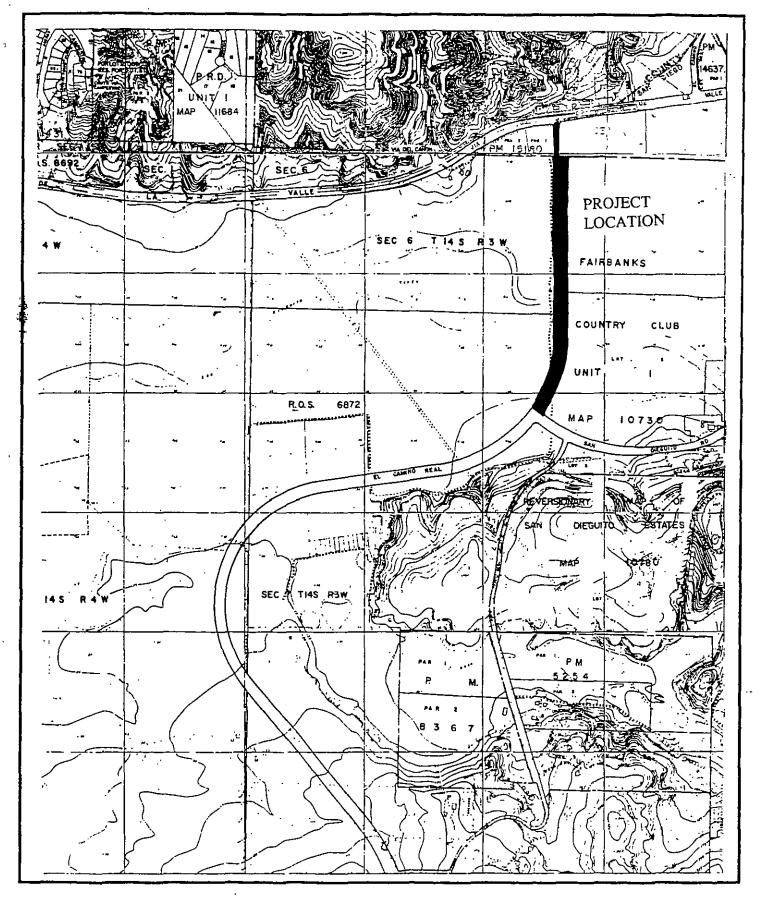
John Fisher, Development Project Manager Allison Raap, Senior Environmental Planner Kerry Santoro, Senior Planner David Nagy, Caltrans Tirzo Gonzalez, Earth Tech EAS Seniors Environmental File



EL CAMINO REAL ROAD WIDENING/BRIDGE REPLACEMENT

Figure 1

CITY OF SAN DIEGO • DEVELOPMENT SERVICES DEPARTMENT





LOCATION MAP

EL CAMINO REAL ROAD WIDENING/BRIDGE REPLACEMENT

Figure 2

CITY OF SAN DIEGO • DEVELOPMENT SERVICES DEPARTMENT

CITY OF SAN DIEGO M E M O R A N D U M

DATE:	December 4, 2002
TO:	Donna Clark, Associate Planner, Environmental Analysis Section
FROM:	Chris Gascon, Associate Civil Engineer, Water Review Section
SUBJECT:	El Camino Real Road Widening/Bridge Replacement - Notice of Preparation of a Draft Joint Environmental Impact Report/Environmental Assessment, LDR No. 42-0351

We have completed our review of the subject Notice of Preparation of a Draft Environmental Impact Report/Environmental Assessment dated November 6, 2002. The project proposes the widening of a .5 mile section of El Camino Real between Via de la Valle and San Dieguito Road to a four-lane major road with curbs, gutters, pedestrian walkways, bike lanes, pedestrian/equestrian crossings and landscaped medians. The existing bridge would be replaced with a new structure and a portion of the river channel would be deepened and widened. The western portion of the site is within Subarea II of the Future Urbanizing Area and the eastern portion is in the Fairbanks Ranch Country Club Community Planning Area.

The Water Review Section looks forward to reviewing the Draft Environmental Impact Report.

If you have any questions or require further information, please call me at 533-7417.

Chris Gascon, P.E.

cc: Shahin Moshref, Senior Civil Engineer, Development Services

02-164-21.016



JOINT POWERS AUTHORITY BOARD OF DIRECTORS

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Dr. Philip Pryde Citizens Advisory Committee

Dick Bobertz Executive Director San Dieguito River Valley Regional Open Space Park 18372 Sycamore Creek Road Escondido, CA 92025 (858) 674-2270 Fax (858) 674-2280 www.sdrp.org

December 5, 2002

Donna Clark Development Services Dept. Land Development Review Division 1222 First Avenue, Fifth Floor Mail Station 501 San Diego, CA 92101

Subject: Notice of Preparation of Draft EIR/EA El Camino Real Road Widening/Bridge Replacement

Dear Ms. Clark:

Thank you for providing the San Dieguito River Park Joint Powers Authority (JPA) staff an opportunity to comment on the Notice of Preparation (NOP) for the above-listed project. River Park staff has met with City of San Diego staff on this project regarding its design and incorporation of the River Park's Coast to Crest trail alignment into the project design. The NOP adequately references the project site's location in the River Park's Focused Planning Area (FPA) and recognizes the potential impacts of the project on the River Park to be analyzed in the draft EIR/EA. In addition to the issues mentioned in the NOP, River Park staff also requests that the EIR/EA specifically evaluate the project's compatibility with the River Park's proposed wetland restoration project at the San Dieguito Lagoon. The subject segment of El Camino Real represents the eastern boundary of the \$50 million restoration project to be implemented jointly by Southern California Edison and the San Dieguito River Park JPA. A certified EIR/EIS is available for this project. Construction of this project is anticipated to begin in late 2003.

River Park staff appreciates City staff's recognition of the project's sensitive location and potential impacts. We look forward to reviewing the EIR/EA. In addition, this project will be reviewed by the River Park's Citizens Advisory Committee and JPA Board of Directors when the environmental documentation becomes available. Thank you for your consideration.

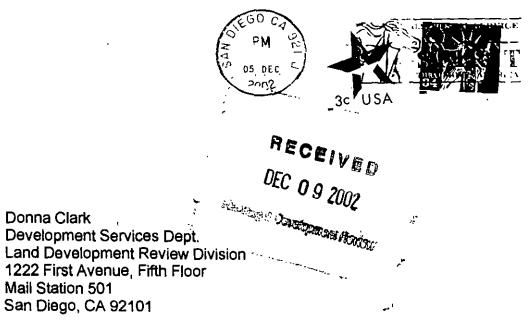
Sincerely.

Shawna C. Anderson, AICP Environmental Planner

Cc: Jan Fuchs, PRC Chair



San Dieguito River Park Joint Powers Authority 18372 Sycamore Creek Road Escondido, CA 92025



November 13, 2002



Ms. Donna Clark, Associate Planner City of San Diego Development Services Department Land Development Review Division 1222 First Avenue, MS 501 San Diego, California 92101

Subject: Response to the Revised Notice of Preparation of a Draft Joint Environmental Impact Report/Environmental Assessment for the El Camino Real Road Widening/Bridge Replacement project.

Dear Ms. Clark:

San Diego Gas and Electric Company (SDG&E) by its duly authorized agent and parent company, Sempra Energy Utilities, is responding to your Revised Notice of Preparation for the El Camino Real Road Widening/Bridge Replacement Joint EIR/EA. The following information is provided for your consideration:

- Please include specific environmental impact analyses related to any proposed utility relocation including any new facilities, such as poles needed to accommodate the relocations. The Draft EIR/EA should include a description of any SDG&E utility/facility that could be impacted by the proposed project and identify the utility on all diagrams. For example, several electric distribution poles and one electric transmission tower are located within the project site boundary. Project impacts to these poles or other SDG&E facilities should be fully analyzed in the Draft EIR/EA. Underground utility facilities are also located in the area of the project site.
- Please note that access to any transmission and distribution facilities must be provided during and after construction.
- Proposed access roads and grading must comply with SDG&E Guidelines for any encroachment to, and into any transmission rights-of-way. Furthermore, any grading to be performed within SDG&E right-of-way would require a "permission to grade letter" from SDG&E.

Ms. Donna Clark November 13, 2002 Page 2

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- Any changes in grade shall not direct drainage in a manner that increases the potential for erosion around SDG&E facilities or access roads.
- Project grades shall be coordinated to assure clearances as required by California Public Utilities Commission General Order 95.
- Any temporary or permanent relocation of facilities or placement of facilities underground and/or associated temporary outages shall be completed at the cost of the City of San Diego.

All project plans that affect or could affect SDG&E facilities and/or rights-of-way must be coordinated with Mike Williams of Sempra Energy Utilities, Land Management (858) 654-1201. We appreciate the opportunity to comment on this Revised NOP. If you have any questions, please feel free to contact me at (619) 696-4943.

Sincerely,

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Patrick O'Neill Land Planner Sempra Energy Utilities SDG&E



US Fish and Wildlife Service Carlsbad Fish and Wildlife Office 6010 Hidden Valley Road Carlsbad, California 92009 (760) 431-9440 FAX (760) 431-5902



California Department of Fish & Game South Coast Regional Office 4949 Viewridge Avenue San Diego, California 92123 (858) 467-4201 FAX (858) 467-4299

In Reply Refer to: FWS-SDG-3236.1

Donna Clark City of San Diego Development Services Department Land Development Review Division 1222 First Avenue, MS 501 San Diego, CA 92101

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DEC 12 2002

Re: Comments on the Notice of Preparation of a Draft Joint Environmental Impact Report/Environmental Assessment for the El Camino Real Road Widening/Bridge Replacement Project (SCH# 1999071104)

Dear Ms. Clark:

The California Department of Fish and Game (Department) and U. S. Fish and Wildlife Service (Service) (collectively, "Wildlife Agencies") have received, on November 12, 2002, and reviewed the above-referenced notice of preparation (NOP) of a draft environmental impact report environmental assessment (DEIR/EA) for the El Camino Real Road Widening/Bridge Replacement Project (Proposed Project), and the November 6, 2002, letter from the City of San Diego's (City) Development Service's Department regarding the scope of work for the DEIR/EA (City's letter). We also attended the City's April 10, 2002, pre-application meeting on the proposed project.

The comments provided herein are based on the information provided at the April 10 meeting and in the DEIR/EA, the Wildlife Agencies knowledge of sensitive and declining vegetation communities in San Diego County (County), and our participation in regional conservation planning efforts. To assist the City of San Diego in minimizing and mitigating project impacts to biological resources, and to assure that the project is consistent with ongoing regional habitat conservation planning efforts, we offer our recommendations and comments in Enclosure 1. In summary, we have the following major concerns about the proposed project as described in the NOP: (1) the potential effects to biological resources within the San Dieguito River; (2) potential impacts to the federally and state listed as endangered light-footed clapper rail (*Rallus longirostris levipes*); (3) potential impacts to wildlife corridors and movement; and (4) potential impacts to sensitive riparian species.

The primary concern and mandate of the Service is the protection of public fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Endangered Species Act of 1973, as amended

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Ms. Donna Clark (FWS-SDG-3236.1)

(Act) (16 U.S.C. 1531 et seq.). The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA) and is responsible for ensuring appropriate conservation of fish and wildlife resources including rare, threatened, and & endangered plant and animal species, pursuant to the California Endangered Species Act (CESA). The Department also administers the Natural Community Conservation Planning (NCCP) program.

The proposed project would widen a 0.5-mile section of El Camino Real between Via de la Valle and San Dieguito Road from a two-lane rural roadway, without shoulders, divided median, or pedestrian walkways, to a four lane major road with curbs, gutters, pedestrian walkways, bike lanes, equestrian/pedestrian crossings, and landscaped medians. The existing bridge would be replaced with a new structure and a portion of the San Dieguito River would be deepened and widened.

The City's preferred alternative at the time of the April 10, 2002, meeting proposed to widen the river by excavating approximately 8.7 acres of upland along its southern bank. The project would widen the river by up to 100 feet for a distance of 800 feet upstream of (i.e., east of) El Camino Real and up to 300 feet for 1,000 feet downstream of the road. Project construction is proposed to occur in phases.

The western portion of the site is within the Subarea II of the Future Urbanizing Area, and the eastern portion is in the Fairbanks Ranch Country Club Community Planning Area. Portions of the project are within the Multiple Habitat Preservation Area of the City's Multiple Species Conservation Program (MSCP) Subarea Plan. The project is upstream of San Dieguito Lagoon, and may affect the restoration efforts for the Lagoon under the San Dieguito River Park Joint Powers Authority (JPA) Restoration Plan (2000).

The Wildlife Agencies appreciate the opportunity to comment on this NOP. We are available to work with the City and their consultants to obtain any necessary permits for the proposed project. Please contact Libby Lucas of the Department at (858) 467-4230 or John DiGregoria of the Service at (760) 431-9440 if you have any questions or comments concerning this letter.

Susan E. Wynn Acting Assistant Field Supervisor U.S. Fish and Wildlife Service

Enclosure

Sincerely,

Chand

William E. Tippets Environmental Program Manager California Department of Fish and Game

cc: California Coastal Commission (Ellen Lirley) Department of Fish and Game (Tamara Spear) 2

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WILDLIFE AGENCY COMMENTS AND RECOMMENDATIONS ON NOTICE OF PREPARATION OF A DRAFT JOINT ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL ASSESSMENT FOR THE EL CAMINO REAL ROAD WIDENING/BRIDGE REPLACEMENT PROJECT IN SAN DIEGO, CALIFORNIA

Major Concerns

- 1. The Wildlife Agencies have the following comments regarding potential project-related effects to the biological resources supported by the San Dieguito River.
 - a. We are concerned about the project-related potential direct and indirect hydrological impacts, particularly the long-term impacts on the riparian resources from widening and deepening the river. The DEIR/EA should provide a thorough analysis of the project's potential impacts on the riparian system supported by the San Dieguito River (including the river, the riparian habitat it supports, and the floodplain), and describe measures that would be taken to avoid indirect impacts on the morphology, habitat, and natural functions of the system. The DEIR/EA should also provide an analysis of the effects on the existing hydraulics of San Dieguito Lagoon, including scouring and deposition patterns. The preferred alternative should not adversely affect the design hydrology intended for the JPA Restoration Plan. The DEIR/EA should clarify the need and purpose of widening the river by as much as 100 feet, for a distance of 800 feet upstream of (i.e., east of) El Camino Real, and up to 300 feet, for a distance of 1,000 feet, downstream of the road.
 - b. The embankments that would be built to support the raised road would occupy floodplain that now accommodates flood flows. The DEIR/EA should provide a thorough discussion about the proposed reduction of the floodplain (including a quantification of the reduction in flood flow capacity), and the resulting need to widen San Dieguito River to accommodate 100-year flood flows and to avoid an increase in the size of the 100-year floodplain and potential flooding of Via de la Valle. The DEIR/EA should consider an alternative design with the proposed bridge spanning the entire 100-year floodplain using supports that do not occupy large areas of the floodplain (unlike the proposed embankments) within the project footprint, and other designs that would not adversely affect stream morphology and floodplain function and connectivity.
 - c. It is not clear from the documentation we reviewed whether any of the area used to widen San Dieguito River would be considered as mitigation for the impacts on wetlands. Any portion of that area requiring maintenance at any frequency, would not be acceptable to the Wildlife Agencies as mitigation.
 - d. In addition to describing the direct impacts on the riparian habitat, the DEIR/EA should include a discussion of: (a) the entire riparian area that would be partially or fully shaded by the project in the impact analysis; and (b) the existing riparian habitat, if any, that would require maintenance (at any frequency) to maintain the hydraulic capacity of

Enclosure 1 (FWS-SDG-3236.1)

the modified 100-year floodplain. The DEIR/EA should propose appropriate mitigation for these impacts. Off-site mitigation should be within the San Dieguito River watershed and enhance existing watershed level restoration efforts.

- 2. According to the Endangered Species Consultation Biological Assessment for the Interstate 5 Northbound Auxiliary Lane: Del Mar Heights Road to Via De La Valle (September 2002), the state and federally listed as endangered light-footed clapper rail (clapper rail) occurs within the proposed project's preferred alternative project footprint. Pursuant to Section 3511 of the California Fish and Game Code, the clapper rail is also designated as a State Fully Protected species. This designation prohibits take or possession of this species at any time (i.e., no take authorizations from the State are available). This also applies to any parts of the animal (e.g., in the case of birds, their eggs). The San Dieguito River should be surveyed for the presence of this species to determine whether clapper rails are utilizing the emergent wetlands around the existing El Camino Real bridge. The DEIR/EA should discuss the presence of the clapper rail within the project's area of potential effect.
- 3. We are concerned about the project-related potential impacts on wildlife corridors and movement within the project footprint and the vicinity. The DEIR/EA should comprehensively discuss this issue, including consideration of the cumulative impacts on wildlife movement from the proposed project and proposed modifications of the Boudreau property adjacent to and to the west of the project site (this discussion should be in the biology section of the DEIR/EA). The DEIR/EA's discussion regarding mitigation for impacts should include consideration of the installation of directional fencing long enough to prevent end runs, reconstruction of culverts that accommodate or could accommodate wildlife, construction of adequately sized new culverts where need is indicated for wildlife movement, installation of structures (e.g., berms, sound walls) to attenuate noise levels, and light (e.g., car and street lights) attenuation measures. If necessary to ascertain the potential impacts on wildlife movement and to assist in determining appropriate measures to eliminate or minimize these impacts, the City should conduct a wildlife movement study. The Wildlife Agencies request the opportunity to review the scope of work intended for any such study the City plans to conduct. If no such study is done, the DEIR/EA should demonstrate that the information used for the impact analysis is adequate.
- 4. The City's letter requires a habitat evaluation for the state listed as endangered Belding's savannah sparrow (*Passerculus sandwichensis beldingi*), the state and federally listed as endangered least Bell's vireo (*Vireo bellii pusillus*) and southwestern willow flycatcher (*Empidonax traillii extimus*), the federally listed as endangered and California Species of Special Concern (CSC) arroyo toad (*Bufo californicaus*), and the federally listed as endangered and CSC Pacific pocket mouse (*Perognathus longimembris pacificus*). The City's letter also requires focused surveys for federally listed endangered species. We recommend that the habitat evaluation also determine suitability of the habitat for and/or conduct surveys for all CSC (e.g., western spadefoot, *Scaphiopus hamondii*) and species designated as locally rare associated with the wetland habitats that would be affected, and all avian species that may nest within the project's area of potential effect. Project construction should be timed and conducted to avoid direct and indirect impacts (e.g., lighting) to all such species.

Additional Comments

- 1. The City has an approved Subarea Plan and Implementing Agreement under the Natural Community Conservation Planning program. The DEIR/EA for the proposed project must ensure and verify that all requirements and conditions of the Subarea Plan and Implementing Agreement are met. The DEIR/EA should also address biological issues that are not addressed in the Subarea Plan and Implementing Agreement, such as specific impacts to and mitigation requirements for wetlands or sensitive species and habitats that are not covered by the Subarea Plan and Implementing Agreement.
- 2. Issue areas in the DEIR/EA that may be influenced by the Subarea Plan and Implementing Agreement include "Land Use," "Landform Alteration/Visual Quality," "Traffic/Circulation," "Biological Resources," "Drainage/Urban Runoff/Water Quality," "Noise," and "Cumulative Effects." In addition, the DEIR/EA should describe why the proposed project, irrespective of other alternatives to the project, is consistent with and appropriate in the context of the Subarea Plan.
- 3. The Service is signatory to the NEPA/404 Integration Process for Transportation Projects in Arizona, California, and Nevada. As such, the Service should be a participant in the development of the purpose and needs statement, and project alternatives to ensure that the final project avoids and minimizes impacts to biological resources to the maximum extent possible. The NOP describes a series of alternatives, including a preferred alternative, when there has been no NEPA/404 Integration Process to develop these alternatives. The NOP is getting ahead of the process by presenting alternatives without signatory agency participation and concurrence.
- Pursuant to Section 143.0130(d) of the City's Environmentally Sensitive Lands (ESL) 4. Regulations, uses permitted in wetlands within the Coastal Overlay Zone are limited to aquaculture, nature study projects or similar resource-dependant uses, wetland restoration projects, and incidental public service projects. The project site is within the Coastal Overlay Zone and the proposed project would comport with none of the aforementioned categories. Section 143.0141(b) of the ESL Regulations states, "outside and inside the MHPA, impacts to wetlands,, shall be avoided." and, "Mitigation for impacts associated with a deviation¹ shall achieve the goal of no-net-loss and retain in-kind functions and values." In adopting a process for deviations from the ESL Regulations within the Coastal Overlay, the San Diego City Council contemplated situations in which the City would seek exemptions to the prohibition against affecting wetlands in the Coastal Overlay Zone. Section 143.0150(c) of the ESL Regulations states, "Within the Coastal Overlay Zone, deviations from the ESL Regulations may be granted only if the decision maker makes the findings in Section 126.0708." Therefore, the DEIR/EA should provide draft findings pursuant to Section 126.0708.

^{1 &}quot;Deviation" refers to the section of the City's Land Development Code, entitled "Deviations from Environmentally Sensitive Lands Regulations Within the Coastal Overlay Zone" (Section 143.0150[c])

Enclosure 1 (FWS-SDG-3236.1)

- 5. If avoidance of the avian breeding season is infeasible, pursuant to Sections 3503, 3503.5 and 3513 of the California Fish and Game Code², the DEIR should require that: (a) all vegetation clearing occur outside of the avian breeding season (i.e., should occur between September 1 and February 14, January 14 for raptors) in areas that would support avian nests; and (b) where there is suitable nesting habitat for any non-game birds within 300 feet of the project work area (within 500 feet for raptors), measures are implemented to avoid disturbing avian breeding behavior from indirect effects (e.g., noise, line-of-sight disturbances, night-lighting).
- 6. The DEIR/EA should clarify that a biological assessment is required for both informal and formal section 7 consultation under the Act if the project results in a "may effect" to federally listed species.
- 7. The Biological Resources section in the DEIR/EA should discuss the biological resources within the project's area of potential effect, not just within the project footprint.
- 8. The DEIR/EA should discuss the use of non-invasive, preferably native species, for all proposed landscaping (e.g., median, and shoulders).³ For native species, local seed (or plantings from local seed) should be used to the extent possible. We are concerned about the potential for invasive species to establish in areas of native vegetation, thereby reducing the biological viability of the habitat. We are also concerned about the use of any chemical pesticides or fertilizers that may pollute the San Dieguito River and negatively affect the aquatic species in the river and predators of those species. The use of native species in landscaping precludes or minimizes the need for such products.
- 9. The Hydrology/Water Quality section should address increased peak flows from increased impervious surface area associated with the road widening and provide mechanisms for attenuating these flows to preconstruction conditions. The DEIR/EA should quantify and propose mitigation for the habitat used to accommodate the associated best management practices.
- 10. As the City acknowledges, the proposed project will require a Streambed Alteration Agreement (SAA) from the Department. The Department's issuance of a SAA for a project

² Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal Migratory Bird Treaty Act of 1918 [50 C.F.R. Section 10.13]; MBTA). See specific Sections of the Code for particulars. Migratory nongame native bird species are protected by international treaty under the MBTA.

³ Exotic plant species not to be used include those species listed on Lists A & B of the California Exotic Pest Plant Council's list of "Exotic Pest Plants of Greatest Ecological Concern in California as of October 1999." This list includes such species as: pepper trees, pampas grass, fountain grass, ice plant, myoporum, black locust, capeweed, tree of heaven, periwinkle, sweet alyssum, English ivy, French broom, Scotch broom, and Spanish broom. A copy of the complete list can be obtained by contacting the California Exotic Pest Plant Council at 32912 Calle del Tesoro, San Juan Capistrano, CA 92675-4427, or by accessing their web site at http://www.caleppc.org.

that is subject to the California Environmental Equality Act (CEQA) requires CEQA compliance actions by the Department as a Responsible Agency. As a Responsible Agency under CEQA, the Department may consider the City's CEQA documentation. To minimize additional requirements by the Department pursuant to Section 1600 *et seq.* and/or under CEQA, the documentation should fully identify the potential impacts to the river, riparian resources, and wetlands, and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the agreement.

- 11. The City's letter identifies the required discretionary actions necessary for the proposed project. In addition to the regulatory actions listed, we believe that the project would also be subject to the State Water Resources Control Board's General Construction Storm Water Permit.
- 12. The City's letter indicates that the piles of the existing bridge are set in sediment that could liquefy in a seismic event. However, in the section on geology/seismicity/soils, the letter indicates that the project site has a low potential for liquefaction. The DEIR should thoroughly substantiate the need for any features of the proposed project designed to address seismic stability that would also increase biological impacts.

STEPHENSON WORLEY GARRATT SCHWARTZ GARFIELD & PRAIRIE

TIMOTHY K. GARFIELD GREGORY C.M. GARRATT LAUREL LEE HYDE CAROL A. LEONE SARAH H. MASON DIANE B. MCCLOSKEY MICHAEL W PRAIRIE WILLIAM J. SCHWARTZ, JR. DIANE M. SEABERG GARY J. STEPHENSON DONALD R. WORLEY A LOUTED LIABLITY PARTNERSHEP LAWYERS 401 "B" Street, Suite 2400 San Diego, California 92101-4200

> OF COUNSEL: ELAINE L. CHAN KENT H. FOSTER RALPH E. HUGHES

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E-MAIL SDLAW@SWGSGP.COM

December 4, 2002

WRITER'S EXT.

Ms. Donna Clark, Associate Planner City of San Diego Development Services Dept. Land Development Review Division 1222 First Avenue, M.S. 501 San Diego, CA 92101

Re: Revised Notice of Preparation of Draft Joint EIR/EA

Dear Ms. Clark:

We represent Dr. and Mrs. T.C. Hu, whose family trust owns property at the southeast corner of Via de la Valle and El Camino Real.

For years the Hus have experienced drainage problems on their property because the City, over their objections, directed drainage from a convalescent home across Via de la Valle onto their property. The City allowed the developer to put pipes under Via de la Valle and to build a "headwall" on the Hus' property to divert drainage west along Via de la Valle. It was hoped the water would eventually drain into the San Dieguito River Valley. It has worked very poorly in that regard.

Copies of photographs of that construction and the resulting ponding are attached, as well as correspondence regarding same. In effect, the City has ignored their complaints over the years.

Now, with the bridge and road widening, the Hus are faced with a new problem. The raised elevation of the roadway will undoubtedly increase runoff and/or the velocity of runoff onto the Hu property. This needs to be addressed in the EIR/EA and appropriate mitigation measures adopted. The Hydrology section of the revised scoping letter is inadequate in this regard.

STEPHENSON WORLEY GARRATT SCHWARTZ GARFIELD & PRAIRIE, LLP

Donna Clark, Associate Planner City of San Diego December 4, 2002 Page 2

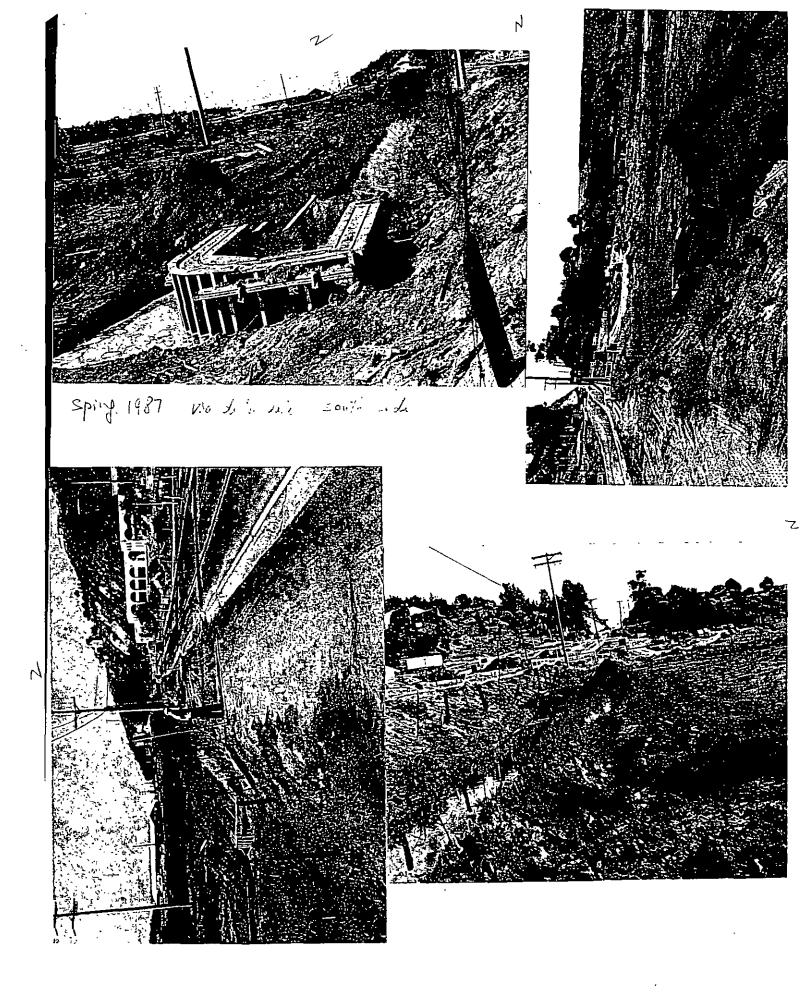
This project presents a unique opportunity to the City. The "hole" created by the proposed new elevation of El Camino Real can be filled as part of this project and it will not only solve the adverse drainage condition created by the City, and thus avoid further legal dispute, but also provide access to El Camino from the Hu property, as other adjacent properties enjoy access.

Because the whole purpose of the new project is to address flooding impacts in the area, it would seem logical to solve local drainage conditions which now exist and will be exacerbated by the project.

Please see to it that these problems are appropriately addressed in the Draft EIR/EA, and also please note my name and address for future notices.

Thank you for your courtesy and cooperation. Yours very trul Donald R. Worley

DRW:sc Encs. cc: Mr. & Mrs. Hu



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AMENTS:

'rs. Hu lives on the southeast corner of Via de la Valle and Camino Real. 'here is a very large drainage pipe that has drained so much water from the eavy rains recently that there is almost a small lake now in the area. The iding School was closed due to the excess water. She suggests that the pipe 'e moved to spill into the San Dieguito River that is very close by. Please nvestigate this request.

LSE REPLY BELOW IF POSSIBLE AND RETURN MATERIAL SUBMITTED WITH ROUTE SLIP

PONSE:	File No.:

Date: March 3, 1986

The drain pipe mentioned by Mrs. Hu does discharge into the floodplain of the San Dieguito River. To extend the pipe to the stream thread of the river would require installation of some 500 to 1,000 feet of pipe. Since extension of the pipe has no public benefit, expenditure of public funds for this purpose is not warranted.

RESPONSE E

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STREELY BELOW IF POBSIBLE AND RETURN MATERIAL SUBMITTED WITH ROUTE SUP

File ho.:

JASE:

February 28, 1986

Mrs. Hu was contacted by a Street Division supervisor and advised to contact E & D if she wishes to have the storm grain pipe extended. Extending the drain pipe in question is not the responsibility of the Street Division.

C. 3:

C. Buchanan General Utility Supervisor

2000:





ABBE WOLFSHEIMER COUNCILMEMBER FIRST DISTRICT

April 2, 1986

Dr. T. C. Hu 8422 Prestwick Drive La Jolla, CA 92037

Dear Dr. Hu:

I have received a reply from the General Services Department and I am enclosing a copy for you.

If you have any additional questions, please do not hesitate to contact my office. Your interest on community matters is appreciated.

Sincerely,

aboe

Abbe Wolfsheimer Councilmember - District 1

AW/bj

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GEORGE S. DELAFIELD ROBERT G. SULLIVAN RICHARD D. HEDORNED ROBERT D. HIDDENOORT WILLIAM A. BRAMLEY N. ERIC V. BENMAM RANDOLPH C. HOUTS

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SULLIVAN, DELAFIELD, MCDONALD & MIDDENDORF A PROFESSIONAL CORPORATION ATTORNEYS AT LAW SECURITY PACIFIC PLAZA SUITE 1405 + 1200 THIRD AVENUE SAN DIEGO, CALIFORNIA 92101 TELEPHONE (619) 232-1400

February 19, 1987

John Fowler, Asst. City Manager CITY OF SAN DIEGO City Administration Building 202 C Street, Ninth Floor San Diego, California 92101

HAND DELIVERED

Dear Mr. Fowler:

This firm represents T. C. Hu, the owner of North County Riding Center, 3995 Via De La Valle in the County of San Diego. According to Mr. Hu, a retirement home is being built on an adjacent site by Roel Construction Company, Work No: TM-86-0245, Permit No: 230-85-D, Drawing No: 230-85-1-B.

discharge pipe has been installed at or near the boundary of the construction site and my client's property. This pipe apparently discharges water onto my client's property. Also, a fence was knocked down, property was trespassed on and dug up during the installation of this pipe.

Mr. Hu respectfully requests an immediate investigation of this matter and would like any necessary repairs to the fence and/or his property to be made by the contractor. Moreover, Mr. Hu would like insurance against further property damage resulting from the construction of the retirement home.

The address of Roel Construction Company is P. O. Box 80216, San Diego, California, 92138, the phone number is 297-4156, and the president is George Line.

If you have any questions or comments, please feel free to give me a call. Otherwise, you may contact Mr. Hu directly at his office (534-3854). Thank you for your time and attention.

Very truly yours,

SULLIVAN, DELAFIELD, MCDONALD & MIDDENDORF

RANDOLPH C. HOUTS

RCH:dkn cc: T.C. Hu



SAN DIEGO

1222 First Avenue • M.S. 407 • SAN DIEGO, CA 92101 TELEPHONE: (619) 236-6001

ENGINEERING & DEVELOPMENT DEPARTMENT

February 27, 1987

Sullivan, Delafield, McDonald & Middendorf Attorneys at Law Security Pacific Plaza 1200 Third Avenue, Suite 1405 San Deigo, CA 92101 RECEIVED MAR 3 1937 SULLIVAN, DELAFIELD, MODOMALD & MICDENDORF

Attention: Randolph C. Houts

Your letter of February 19, 1987, to Mr. Fowler, Assistant City Manager, has been referred to me for response.

A Conditional Use Permit (C.U.P.) for a convalescent hospital at the northeast corner of Via de la Valle and El Camino Real has been approved. One of the conditions of the C.U.P. is to improve the north side of Via de la Valle and the east side of El Camino Real. The existing 18" culvert under Via de la Valle, just east of El Camino Real, is not large enough to carry the anticipated run off from the drainage area, based on today's design standards. Therefore, an additional 18" pipe has been installed adjacent to the existing culvert. Also, a new headwall was constructed which will direct the water westerly along Via de la Valle, rather than directly on to your client's property. There are two other culverts under Via de la Valle in this area that are not being altered because of this development.

I talked to Mr. Hu, by telephone, a few days ago. I discussed with him why the additional culvert and headwall was constructed. I also discussed the damage to the fence and advised him to get in touch with the City Engineer's Inspector to get his assistance to get the fence repaired. He indicated that he had just talked to Mr. Allen in our Field Division, and that Mr. Allan would investigate and get back to him. Incidentally, the fence is not on the property line. It encroaches several feet inside the street right of way. The property line is 40 feet from the center of the street.

Your letter is being forwarded to our Field Division to follow up on the repair of the fence or any other damage that the contractor may have caused to your client's property.

C. R. LOCHHEAD Subdivision Engineer

cc: Fowler Zull SULLIVAN, DELAFIELD, MCDONALD & MIDDENDORF

GEORDE & DELARELO ROBERT G. SULLIVAN RCHARD D. HODONALD ROBERT D. HIDDENDORF WILLIAM A. BRAMLEY M. ERIC V. BENHAM RANDOLPH C. HOUTS A PROFESSIONAL CORPORATION ATTORNEYS AT LAW SECURITY PACIFIC PLAZA SUITE 1405 • 1200 THIRD AVENUE SAN DIEGO, CALIFORNIA 92101 TELEPHONE (619) 232-1400

March 3, 1987

Mr. T. C. Hu 8422 Prestwick Drive La Jolla, California 92037

Re: Drainage Problem on Via De La Valle Property

Dear Mr. Hu:

Enclosed please find a copy of a letter I received from the City of San Diego regarding your complaint with respect to the construction of a convalescent hospital adjacent to your property located on Via De La Valle.

Pursuant to our conversations, I plan to take no further action on this matter without your specific instruction. If you have any questions or comments, please feel free to give myself or Mr. Middendorf a call.

Sincerely yours,

SULLIVAN, DELAFIELD, MCDONALD & MIDDENDORF

RANDOLPH C. HOUTS

RCH:dkn Enclosure

J. B.YOUNG & associates, Itd

February 27, 1987

Professor T. C. Hu Computer Science Center University of California - San Diego C-14 La Jolla, California 92093

SUBJECT: Drainage along Via De La Valle

Dear Professor Hu:

This summarizes our understanding of your conversation with our Paul Danielson on February 26, 1987. It is our understanding that we have permission to grade on your property in the area around the headwall. We will restore the damaged areas of your property near the headwall to their original condition. The wire fence, running parallel to Via De La Valle, will be repaired in the area of the headwall.

Grading operations will begin when the area dries from the recent rains. We will call you at 534-3854 not less than 24 hours before we plan to enter your property.

If any further information is required, please feel free to contact us. If our understanding of this matter is not correct, as outlined above, please notify us immediately so that corrective action can be taken. Thank you for your cooperation and understanding.

Very truly yours,

JB YOUNG & ASSOCIATES, LTD.

Jeffery B. Young Principal

PBD/JBY/gb YAWO: 8607

cc: Robert Stowell, Roel Construction Company, Inc.

Appendix B

404(b)(1) Guidelines Information

APPENDIX B 404(b)(1) GUIDELINES INFORMATION

Relevant policies of the 404(b)(1) Guidelines include the following:

230.70 (b) Designing the discharge to avoid a disruption of periodic water inundation patterns

230.71

230.71(a) Disposal of dredged material in such a manner that physiochemical conditions are maintained and the potency and availability of pollutants are reduced.

230.71 (b) Limiting the solid, liquid, and gaseous components of material to be discharged at a particular site.

230.71 (c) Adding treatment substances to the discharge material.

230.71 (d) Utilizing chemical flocculants to enhance the deposition of suspended particulates in diked disposal areas.

Sec. 230.73 Actions affecting the method of dispersion.

The effects of a discharge can be minimized by the manner in which it is dispersed, such as:

230.73(a) Where environmentally desirable, distributing the dredged material widely in a thin layer at the disposal site to maintain natural substrate contours and elevation.

230.73(b) Orienting a dredged or fill material mound to minimize undesirable obstruction to the water current or circulation pattern, and utilizing natural bottom contours to minimize the size of the mound.

230.73(c) Using silt screens or other appropriate methods to confine suspended particulate/turbidity to a small area where settling or removal can occur.

230.73(d) Making use of currents and circulation patterns to mix, disperse and dilute the discharge.

230.73(e) Minimizing water column turbidity by using a submerged diffuser system. A similar effect can be accomplished by submerging pipeline discharges or otherwise releasing materials near the bottom.

230.73(f) Selecting sites or managing discharges to confine and minimize the release of suspended particulates to give decreased turbidity levels and to maintain light penetration for organisms.

230.73(g) Setting limitations on the amount of material to be discharged per unit of time or volume of receiving water.

Sec. 230.74 Actions related to technology.

Discharge technology should be adapted to the needs of each site. In determining whether the discharge operation sufficiently minimizes adverse environmental impacts, the applicant should consider:

230.74(a) Using appropriate equipment or machinery, including protective devices, and the use of such equipment or machinery in activities related to the discharge of dredged or fill material.

230.74(b) Employing appropriate maintenance and operation on equipment or machinery, including adequate training, staffing, and working procedures.

230.74(c) Using machinery and techniques that are especially designed to reduce damage to wetlands. This may include machines equipped with devices that scatter rather than mound excavated materials, machines with specially designed wheels or tracks, and the use of mats under heavy machines to reduce wetland surface compaction and rutting.

230.74(d) Designing access roads and channel spanning structures using culverts, open channels, and diversions that will pass both low and high water flows, accommodate fluctuating water levels, and maintain circulation and faunal movement.

230.74(e) Employing appropriate machinery and methods of transport of the material for discharge.

Sec. 230.75 Actions affecting plant and animal populations.

Minimization of adverse effects on populations of plants and animals can be achieved by:

(a) Avoiding changes in water current and circulation patterns which would interfere with the movement of animals;

(b) Selecting sites or managing discharges to prevent or avoid creating habitat conducive to the development of undesirable predators or species which have a competitive edge ecologically over indigenous plants or animals;

(c) Avoiding sites having unique habitat or other value, including habitat of threatened or endangered species;

(d) Using planning and construction practices to institute habitat development and restoration to produce a new or modified environmental state of higher ecological value by displacement of some or all of the existing environmental characteristics. Habitat development and restoration techniques can be used to minimize adverse impacts and to compensate for destroyed habitat. Use techniques that have been demonstrated to be effective in circumstances similar to those under consideration wherever possible. Where proposed development and restoration techniques have not yet advanced to the pilot demonstration stage, initiate their use on a small scale to allow corrective action if unanticipated adverse impacts occur;

(e) Timing discharge to avoid spawning or migration seasons and other biologically critical time periods;

(f) Avoiding the destruction of remnant natural sites within areas already affected by development.

Sec. 230.76 Actions affecting human use.

Minimization of adverse effects on human use potential may be achieved by:

230.76(a) Selecting discharge sites and following discharge procedures to prevent or minimize any potential damage to the aesthetically pleasing features of the aquatic site (e.g. viewscapes), particularly with respect to water quality.

230.76(b) Selecting disposal sites which are not valuable as natural aquatic areas.

230.76(c) Timing the discharge to avoid the seasons or periods when human recreational activity associated with the aquatic site is most important.

230.76(d) Following discharge procedures which avoid or minimize the disturbance of aesthetic features of an aquatic site or ecosystem.

230.76(e) Selecting sites that will not be detrimental or increase incompatible human activity, or require the need for frequent dredge or fill maintenance activity in remote fish and wildlife areas.

(f) Locating the disposal site outside of the vicinity of a public water supply intake.

Sec. 230.77 Other actions.

230.77(a) In the case of fills, controlling runoff and other discharges from activities to be conducted on the fill.

230.77(b) In the case of dams, designing water releases to accommodate the needs of fish and wildlife.

230.77(c) In dredging projects funded by Federal agencies other than the Corps of Engineers, maintain desired water quality of the return discharge through agreement with the Federal funding authority on scientifically defensible pollutant concentration levels in addition to any applicable water quality standards.

230.77(d) When a significant ecological change in the aquatic environment is proposed by the discharge of dredged or fill material, the permitting authority should consider the ecosystem that will be lost as well as the environmental benefits of the new system.

230.10

(b) No discharge of dredged or fill material shall be permitted if it:

(1) Causes or contributes, after consideration of disposal site dilution and dispersion, to violations of any applicable State water quality standard;

(2) Violates any applicable toxic effluent standard or prohibition under section 307 of the Act;

(3) Jeopardizes the continued existence of species listed as endangered or threatened under the Endangered Species Act of 1973, as amended, or results in likelihood of the destruction or adverse modification of a habitat which is determined by the Secretary of Interior or Commerce, as appropriate, to be a critical habitat under the Endangered Species Act of 1973, as amended. If an exemption has been granted by the Endangered Species Committee, the terms of such exemption shall apply in lieu of this subparagraph;

(4) Violates any requirement imposed by the Secretary of Commerce to protect any marine sanctuary designated under title III of the Marine Protection, Research, and Sanctuaries Act of 1972.

(c) Except as provided under section 404(b)(2), no discharge of dredged or fill material shall be permitted which will cause or contribute to significant degradation of the waters of the United

States. Findings of significant degradation related to the proposed discharge shall be based upon appropriate factual determinations, evaluations, and tests required by subparts B and G, after consideration of subparts C through F, with special emphasis on the persistence and permanence of the effects outlined in those subparts. Under these Guidelines, effects contributing to significant degradation considered individually or collectively, include:

(1) Significantly adverse effects of the discharge of pollutants on human health or welfare, including but not limited to effects on municipal water supplies, plankton, fish, shellfish, wildlife, and special aquatic sites.

(2) Significantly adverse effects of the discharge of pollutants on life stages of aquatic life and other wildlife dependent on aquatic ecosystems, including the transfer, concentration, and spread of pollutants or their byproducts outside of the disposal site through biological, physical, and chemical processes;

(3) Significantly adverse effects of the discharge of pollutants on aquatic ecosystem diversity, productivity, and stability. Such effects may include, but are not limited to, loss of fish and wildlife habitat or loss of the capacity of a wetland to assimilate nutrients, purify water, or reduce wave energy; or

(4) Significantly adverse effects of discharge of pollutants on recreational, aesthetic, and economic values.

Appendix C

Agency Correspondence

From: Greer, Keith [mailto:Keith.Greer@sandag.org]
Sent: Tuesday, May 20, 2014 11:19 AM
To: Marsden, Dean
Cc: 'Lavender-Martin, Sandra E@DOT'
Subject: RE: REMP Working Group Meeting Minutes (I-5 NCC Project)

Dean – Here are the USFWS, USACE-LA and CCC emails regarding the language on temporary impacts associates with the lagoon enhancements.

Sandra can you pass along Tim Dillingham's comments and any comments from the Carlsbad USACE.

What this means for you, is that the resources agencies are not going to require that we mitigate areas of wetlands that we impact. We may not get credit, but they will not call them an impact and there will be no ratio applied to the restoration.

If you have any question please call.

Keith Greer, SANDAG 619-699-7390

From: Brown, Sally [mailto:sally_brown@fws.gov] Sent: Tuesday, May 20, 2014 11:12 AM

To: Lavender-Martin, Sandra E@DOT

Cc: aevans@dudek.com; Kosup, Allan R@DOT; awinecki@dudek.com; Jacobo, Arturo@DOT; Bryant.Chesney@noaa.gov; April, Bruce@DOT; goldmann.elizabeth@epa.gov; Buhr, Gabriel@Coastal; Greer, Keith; Smith, Kim T@DOT; Porter, Mike@Waterboards; McCaffery, Emery@DOT; Harrison, Shay Lynn M@DOT; Spencer.D.Macneil@usace.army.mil; Stephanie.J.Hall@usace.army.mil; Scatolini, Susan@DOT; susan_wynn@fws.gov; Brown, Kanani@Coastal; mcooper@scc.ca.gov; Larry.Vinzant@dot.gov; tim_dillingham@wildlife.ca.gov; Therese.O.Bradford@usace.army.mil; Meris.Bantilan-Smith@usace.army.mil **Subject:** Re: FW: Temporary Impact/Mitigation Language + REMP WKGP Structure

Subject: Re: FW: Temporary Impact/willigation Language + REMP WKGP Structure

Hi Sandra, Susan and I have no further comments, thanks for the opportunity to review!

Sally Brown U. S. Fish and Wildlife Service 2177 Salk Avenue, Suite 250 Carlsbad, CA 92008 Office: (760) 431-9440 x278 Cell: (619) 261-6027 FAX: (760) 431-5901 Sally Brown@fws.gov

From: Hall, Stephanie J SPL [mailto:Stephanie.J.Hall@usace.army.mil] Sent: Tuesday, May 20, 2014 9:58 AM To: Buhr, Gabriel@Coastal; Lavender-Martin, Sandra E@DOT; aevans@dudek.com; Kosup, Allan R@DOT; awinecki@dudek.com; Jacobo, Arturo@DOT; Bryant.Chesney@noaa.gov; April, Bruce@DOT; goldmann.elizabeth@epa.gov; Greer, Keith; Smith, Kim T@DOT; Porter, Mike@Waterboards; McCaffery, Emery@DOT; Sally_Brown@fws.gov; Harrison, Shay Lynn M@DOT; Macneil, Spencer D SPL; Scatolini, Susan@DOT; susan_wynn@fws.gov; Brown, Kanani@Coastal; mcooper@scc.ca.gov; Larry.Vinzant@dot.gov; tim_dillingham@wildlife.ca.gov; Bradford, Therese O. SPL; Bantilan-Smith, Meris SPL

Subject: RE: Temporary Impact/Mitigation Language + REMP WKGP Structure (UNCLASSIFIED)

Classification: UNCLASSIFIED Caveats: NONE

Sorry Sandra,

The Corps is also fine with the language regarding "Temporary Impact/Mitigation Language below...

-Stephanie

Stephanie J. Hall Senior Project Manager, Caltrans Liaison Transportation & Special Projects Branch USACE Los Angles District, Regulatory Division 915 Wilshire Blvd, Suite 930, Los Angeles, California 90017-3401 P: 213.452.3410 | M: 213.304.9682 | F: 213.452.4196

Assist us in better serving you! You are invited to complete our customer survey, located at the following link: http://corpsmapu.usace.army.mil/cm_apex/f?p=regulatory_survey

From: Buhr, Gabriel@Coastal [mailto:Gabriel.Buhr@coastal.ca.gov]

Sent: Tuesday, May 20, 2014 8:07 AM

To: Lavender-Martin, Sandra E@DOT; aevans@dudek.com; Kosup, Allan R@DOT; awinecki@dudek.com; Jacobo, Arturo@DOT; Bryant.Chesney@noaa.gov; April, Bruce@DOT; goldmann.elizabeth@epa.gov; Greer, Keith; Smith, Kim T@DOT; Porter, Mike@Waterboards; McCaffery, Emery@DOT; Sally_Brown@fws.gov; Harrison, Shay Lynn M@DOT; Spencer.D.Macneil@usace.army.mil; Stephanie.J.Hall@usace.army.mil; Scatolini, Susan@DOT; susan_wynn@fws.gov; Brown, Kanani@Coastal; mcooper@scc.ca.gov; Larry.Vinzant@dot.gov; tim_dillingham@wildlife.ca.gov; Therese.O.Bradford@usace.army.mil; Meris.Bantilan-Smith@usace.army.mil Subject: RE: Temporary Impact/Mitigation Language + REMP WKGP Structure

Both look fine to me Sandra.

Coastal Program Manager

On Tue, May 20, 2014 at 7:58 AM, Lavender-Martin, Sandra E@DOT <<u>sandra.lavender@dot.ca.gov</u>> wrote:

Good Morning Everyone!

Just following up to see if anyone has any comments on the attached REMP Structure and/or the Temporary Impact Language below. To date, I have only received comments from Tim. Please provide any comments by this Thursday COB, so that these items can be finalized.

Thank you,

Sandra

From: Lavender-Martin, Sandra E@DOT

Sent: Monday, April 28, 2014 3:44 PM

To: 'aevans@dudek.com'; 'allan_kosup@dot.ca.gov'; 'awinecki@dudek.com'; 'arturo_jacobo@dot.ca.gov'; 'Bryant.Chesney@noaa.gov'; 'bruce_april@dot.ca.gov'; 'goldmann.elizabeth@epa.gov'; 'gbuhr@coastal.ca.gov'; 'kgr@sandag.org'; 'kim_t_smith@dot.ca.gov'; 'mporter@waterboards.ca.gov'; 'emery_mccaffery@dot.ca.gov'; 'Sally_Brown@fws.gov'; 'shay_lynn_harrison@dot.ca.gov'; 'Spencer.D.Macneil@usace.army.mil'; 'Stephanie.J.Hall@usace.army.mil'; 'susan_scatolini@dot.ca.gov'; 'susan_wynn@fws.gov'; 'kbrown@coastal.ca.gov'; 'mcooper@scc.ca.gov'; 'Larry.Vinzant@dot.gov'; 'tim_dillingham@wildlife.ca.gov'; 'Therese.O.Bradford@usace.army.mil'; 'Meris.Bantilan-Smith@usace.army.mil' **Subject:** Temporary Impact/Mitigation Language + REMP WKGP Structure

•

Hello Everyone,

The proposed temporary impact/mitigation language for the REMP is below. The poposed structure for the REMP Working Group has been revised to include all edits received to date. Please review both and provide comments by Tuesday, May 6th.

Temporary Impact/Mitigation Language

Implementation of Resource Mitigation and Enhancement Program (REMP) as outlined in the NCC Public Works Plan will result in some temporary impacts to low quality wetlands, such as disturbed wetlands and non-tidal salt marsh, to re-establish, restore, and enhance high quality tidal and freshwater wetlands. Any potential impacts resulting from the re-establishment, restoration, and enhancement will be identified in the site specific HMMPs. No additional mitigation would be required for these temporary impacts as long as there is a net benefit or a significant increase in quality and function of the re-established/restored/enhanced wetlands. If any portion of the mitigation site fails to meet its success criteria under the HMMP, no credits would be released and mitigation for temporary impacts maybe required at that time.

Thank you, Sandra

Sandra Lavender-Martín

Associate Environmental Planner Department of Transportation - District 11 Environmental Stewardship/Ecological Studies Branch P: (619) 688-0115

CITY OF SAN DIEGO EL CAMINO REAL ROAD/BRIDGE PROJECT AGENCIES MEETING

Meeting Notes for September 26, 2012

Attendees

City: Kerry Santoro, Jerry Jakubauskas, Brad Johnson Rick Engineering: Edgar Camerino, Brendan Hastie RECON: Lisa Lind Hon Consulting: Katherine Hon Nordby Biological: Chris Nordby RBF: Monica Kling Caltrans: Kevin Hovey, Bob James CDFG: Tim Dillingham, Libby Lucas, Kyle Dutro US Fish and Wildlife: Sally Brown USACOE: Michelle Madsen, Stephanie Hall State Water Board: Alan Monji

Discussion

1. Review of Project Purpose and Need (City) – Following introductions, Kerry provided an overview of the project, including the project purpose related to the structural deficiencies and potential flood hazards of the existing El Camino Real Bridge. The bridge is not high enough for a 100 year flood event and does not meet current seismic standards.

2. Background/History/Timetable (City) – 1998 FHWA approved funding for the project with a 10-year timeline. In 2006 a Draft EIR was circulated for public review. Since that time, the City has been looking into additional alternatives and narrowing the footprint in response to community and agency concerns. The City also updated technical studies. The City was also granted an extension from FHWA and as a result is looking to complete the environmental by March 2013. Because the March 2013 deadline may not be met, Caltrans on behalf of the City has requested an unprecedented second extension. The City is currently waiting for the FHWA decision.

3. Current Project/Changes from Past Project - Bridge Design (Rick Engineering) - Edgar and Brendan reviewed the major changes, including: a reduction of 18-feet for the cross sections with reduced widths for travel lanes, bicycle lanes, and medians, a new tie-in to the D R Horton project, and eliminating the channel on the Kruer (former Hu) property in place of a new storm drain plan. Removal of the existing bridge after construction of a new bridge, and the introduction of roundabout alternatives are also changes from the past project. USACOE requested clarification on the length of the bridge and requested that a longer bridge be evaluated. Brendan indicated that the proposed bridge meets the hydraulic requirements. A longer bridge is discussed in the Alternatives Considered but Rejected chapter of both the EIR and the EA. The current proposed bridge design maintains the width of the channel for the protection of clapper rail habitat, and a longer bridge would not provide a benefit to clapper rail habitat. The river channel only carries the 10-year flow within its banks. Higher flows overtop the river banks. The substructure of the bridge needs to be clearly defined and may need to be retained so as not to negatively affect that area. All aboveground elements of the existing bridge will be removed entirely. When the engineers say the "substructure" would remain, they mean the buried piles. Rick Engineering clarified that the bridge for the Eastern Alignment and Roundabout alternatives is at an angle for geometry, so the road can meet De La Valle Place. This design does not affect hydraulics because the columns are round.

Agencies requested additional exhibits be added to the document, including an existing cross-section and a cross-section exhibit for each of the project alternatives. In addition, the location of the sewer line and protective rip rap blanket should be noted. Sally would like to see the rip rap blanket removed if it isn't

necessary to protect the columns; however, we need to look at whether a stabilized river bed may be something the clapper rail like and therefore replacing the rip rap blanket would be needed to avoid impacts.

The agencies requested that the environmental documents disclose that this project would not limit or preclude what can happen on the Fairbanks Ranch property, including creation of additional riparian areas. CDFG clarified that the diagram of mitigation that was supposed to occur attached to their 2006 letter was to be a gentle transition of freshwater marsh with riparian scrub terrace, not a widening of the river.

Michelle asked for clarification of the City departments and Kerry explained what Real Estate Assets, Development Services, and Capital Improvements do.

4. Bridge Construction Methodology Memorandum (Rick Engineering) – Rick Engineering discussed the two methodologies that will be included in the Draft EIR: berm versus trestle. The agencies provided their major concerns: berm would result in fill and a potential for washout during a significant rain event while the trestle would require piles for false work. The trestle would allow construction equipment to be above low river flows. CDFG requested data for sediment transport through the river channel and clear description of the materials that will be used to construct the berm. Kevin suggested that the environmental documents explain what storm event might wash out a berm. USACOE said the trestle may be preferable to the berm for construction; however, the agencies did not identify a preferred method and noted they will wait until the Draft EIR is out for public review in order to assess impacts for both options. All are looking for analysis that considers wildlife movement, hydrology, and duration of construction.

5. Other Impacts/Concerns (Nordby/Agencies) – USFWS brought up potential impacts to mule-fat scrub as a result of the grading under the north abutment. Brad mentioned that the north bridge abutment of the new bridge will be approximately 9 feet higher than the existing bridge, and as a result of the new fill, the existing vegetation will be disturbed regardless of whether or not a trail is constructed. There was confusion about the map of biological impacts showing impacts west of the existing bridge, and this needs to be clarified. The north abutment has been designed to accommodate a planned JPA trail. Per NEPA Section 4(f) requirements the project must not preclude any existing or future (planned) trail. This issue will be looked at. Eastern Alignment as City preferred alternative was raised as a concern by both wildlife agencies due to potential wetland impacts. Environmental documents need to clearly state impacts from all alternatives. Kevin stated Caltrans does not know yet which alternative is less impactive, and emphasized they have to consider more than biological resources impacts.

6. Mitigation (City/Nordby/Agencies) - Project impacts include disturbance of the salt marsh on the Kruer property, however mitigation for this vegetation community is not available on the JPA mitigation site for this project. There would be excess freshwater marsh creation available to satisfy the other mitigation requirements, and that could include Clapper Rail habitat mitigation needs. Chris noted that the mitigation approach to be ultimately approved will dictate if the JPA mitigation site can accommodate all of the mitigation needs for the project. Michelle noted that a proposed invasives removal plan in the river that would be implemented sooner rather than later would be viewed favorably. They are looking for a watershed approach. Tamarisk and pampas grass removal upstream would help protect the future W-19 restoration and the San Dieguito Lagoon restoration downstream. She suggested proposing this aspect as part of the mitigation plan rather than having the agencies require it as maintenance. Libby asked what was the invasive removal requirement for Fairbanks Ranch and the Polo Field code violation. This cannot be counted twice and may limit the "credit" for invasive removal plans as part of El Camino Real. Michelle stated they understand the expense associated with the "in perpetuity" requirement and would accept a defined time frame. The City will confirm if this mitigation has already been established as mitigation for the Fairbanks Ranch project and if it would be a viable option for this project. The agencies were interested in what would happen to the vacated roadway. Sally, Michelle and Libby agreed they would like to see the asphalt removed. Jerry explained that a portion will need to be retained for access to adjacent properties. The agencies asked if any of the W-19 acreage would be available for Fairbanks Ranch mitigation, and Kerry said she didn't think so, given the number of projects already wanting to use the mitigation area, including LOSSAN, I-5 widening, and EI Camino Real.

From: Elizabeth Lucas [mailto:ELucas@dfg.ca.gov]
Sent: Thursday, November 15, 2012 12:50 PM
To: Santoro, Kerry
Cc: Kyle Dutro; Tim Dillingham; 'kevin_hovey@dot.ca.gov'; 'Robert A James'; Sally Brown@fws.gov; nordbybio@gmail.com; aashimine@rbf.com; 'Lisa Lind'; bhastie@rickengineering.com; ecamerino@rickengineering.com; Johnson, Brad; Marsden, Dean; Jerry Jakubauskas; Michelle L SPL Mattson; stephanie.j.hall@usace.army.mil; Alan@Waterboards' 'Monji
Subject: El Camino Real Project Update Meeting Minutes

Hello Kerry,

Thank you for the minutes of the 9-26 meeting on the El Camino Real Bridge Project (Project). Just for the record, the minutes did not capture the following two points made during the meeting (for our purposes, this email effectively modifies the minutes).

1. DFG requested that the recirculated EIR address all the comments in the Wildlife Agencies' October 26, 2006, letter on the draft EIR for the Project.

2. Because the equestrian trail was a subject of significant discussion during the meeting, DFG explicitly pointed to comment #11 in that 2006 letter; that comment addresses the need for the EIR to include in its analysis the impacts of the equestrian trail (not just the grading for the trail).

Regarding the discussion of invasive species removal in San Dieguito River (item #6 in the minutes), attached is DFG's 2003 letter re: the last nine holes of the Fairbanks Ranch golf course; see #7 on page 4 re: the invasive species removal within the River. I assume that the City also required on-going invasive species removal within this reach of the River, but don't know for sure.

I think you were going to include the sign-in sheet for the 9-26 meeting with the minutes. Would you please email it out now?

Thank you.

Libby

Libby Lucas Staff Environmental Scientist NCCP Program California Department of Fish and Game 3883 Ruffin Road San Diego CA 92123 Phone: 858 467-4230 Fax: 858 467-4299 e-mail: <u>ELucas@dfg.ca.gov</u>



GRAY DAVIS, Governor

DEPARTMENT OF FISH AND GAME http://www.dfg.ca.gov 4949 Viewridge Avenue San Diego, CA 92123 (858) 467-4201



June 9, 2003

Jon Petke The Planning Associate 3151 Airway Avenue, Suite R-1 Costa Mesa, CA 92626

Subject: Notification of Lake or Streambed Alteration Notification No. R5-2003-0139 (Fairbanks Ranch Country Club Golf Course Completion)

Dear Mr. Petke;

This letter is in response to the Lake or Streambed Alteration Notification Package (No. R5-2003-0135) that you submitted to the Department of Fish and Game (Department) for your proposed completion of the Fairbanks Ranch Country Club's golf course, located within the City of San Diego, San Diego County.

The Fairbanks Ranch Country Club's ("FRCC") project restarts construction work to complete the nine "holes" necessary to make the existing 18 holes of golf consistent with the originally approved 27-hole golf course complex, and complete the restoration of wetland/riparian habitats. The Department originally authorized the 27-hole golf course project pursuant to Streambed Alteration Agreement Notification No.V-82-311, issued on January 20, 1983. The northern perimeter of the project (i.e., the south river channel) was designed and approved for an earthen berm and rip-rap with a variable slope gradient built up to the 22-23 foot contour. It was constructed as designed along most of the realigned river, but in the area now targeted for completion of the nine holes of golf, the interim grading has built the area up to the approximate 10-14 foot level.

Project Description

FRCC purposes to complete construction of the golf course substantially as it was originally designed and authorized, with the construction of the final nine "holes" of golf. This work also includes raising the river channel berm on the northern edge of the construction site to its originally designed 22-23 foot contour level.

In completing the golf course complex, FRCC will undertake to enhance and maintain existing riparian habitat, and create new riparian habitat, using the native riparian plants prescribed by the original Landscape Concept Plan. See attached <u>Table 1</u> and <u>Exhibits D-1 and D-2</u> for the

listing and location of the existing 97 acres of riparian habitat, its status and its proposed enhancement ("use area" 1-3), and the proposal to create 12 new acres of marsh and riparian inter-connected habitat ("use area" 4 on Exhibit D-2) that is included as part of the proposed completion of the remaining nine holes of golf. The result is 109 acres of riparian habitat. The location of these wetlands is generally conforming to the original project description; however, FRCC has proposed to shift approximately 12 acres of mitigation area from the northern edge of the San Dieguito River to the south. FRCC shall annually monitor and report to the Department for five years on the status of this riparian habitat enhancement and creation undertaking.

Although not required by any project approvals nor credited as habitat mitigation by the Department, FRCC has committed to incorporate an additional 15 acres of marsh and/or riparian habitat into the nine hole golf course design ("use area" 7, 8 on <u>Table 1</u>, as depicted on <u>Exhibits</u> <u>D-1 and E</u>). Combining this with the existing 4 acres of preserved willow pond ("use area" 5) and the 19 acres of previously created lakes on the existing 18-hole golf course ("use area" 6), the overall aquatic/riparian habitat total associated with the 27-hole complex will be 147 acres. See <u>Table 1</u>.

Described in more detail below is the planned construction associated with the completion of the nine holes of golf and the planned work on the existing river channel berm.

Golf Course Construction Work

The nine hole construction project will involve clearing and grubbing, depositing additional clean fill and associated rough grading to reconfigure the construction base, and finally, finished contour grading and installation of the golf course components (tee boxes, fairways, greens, cart path, etc.). See Exhibit F for a schematic of the finished site.

Environmental Commitments:

- At a minimum, a total of 109 acres of riparian habitat will be enhanced, maintained, and created as described on <u>Table 1</u>, including 12 new acres of interconnected marsh and riparian habitat incorporated into the design of the 9-hole golf course completion ("use area" 4 on <u>Table 1</u>).
- A soft-bottom overpass structure will be created for the existing golf course cart path that currently crosses through the existing depression located in "Area 1" on <u>Exhibit D-2</u>. The will allow for a natural habitat corridor connection between the planned riparian areas in the nine hole construction area and the San Dieguito River channel.

River Channel Berm Work

The river channel berm work will involve widening the inland reach of the river's south

perimeter with an approximately ten-foot setback and raising its berm height from the existing 10-14 feet to 22-23 feet. No construction work, equipment or workers will be operating within the existing riparian vegetation. This will be accomplished by staking the upland edge of the existing riparian vegetation dripline (including any pickleweed that is part of the riparian line of vegetation). An additional 5-foot buffer will be added to this exclusion zone.

Above the 5-foot buffer, the existing berm will be widened in the upland area (*i.e.*, away from the riparian vegetation) and raised by excavating into the existing graded area down to the water line and sloping the reconfigured berm back, with additional earthen fill, to its new height of 22-23 feet. Native planting with trees and shrubs from the approved Landscape Plan will be installed to stabilize the berm slope. Subject to specific field construction opportunities, the excavated portion of the berm cut will only be partially backfilled so as to leave a "shelf" along the river's edge that will be conducive to the establishment of riparian willows and other native riparian species. See Exhibits G-1, G-2, G-3 for a series of schematics illustrating this construction work.

Environmental Commitments:

- 3. All work will be conducted above a five foot buffer measured from the 8-10 foot contour line which describes the upland edge of the river's riparian vegetation. This line will be staked and contractors will be required to keep men and equipment on the upland side of this line.
- 4. Best management practices will be employed to insure that the construction work will not result in discharges to the river. These BMPs, summarized from the SWPPP, include, but are not limited to:
 - a Vehicle and equipment service
 - b. Material delivery, handling and storage
 - c. Dust control
 - d. Sediment basins
 - e. Slope stabilization
 - f. Drain inlet protection
 - g. Spill prevention and response.
- 5. Once completed, the river side berm will be vegetated with native riparian and upland plant species from the Landscape Plan's approved plant list. See <u>Exhibit H</u>. Generally, Sand Bar Willow Thickets, Arroyo Willow Forest, and Black Willow Hummocks will be planted in the lower reaches of the river berm, and groves of cottonwood and sycamores will be planted in the upper reaches. The source plant material will include, to the extent available, seeds and cuttings recovered from the riparian species that can occasionally be found growing in upland areas away from

the existing riparian vegetation line.

- 6. All earth moving work will occur between April 15th and October 15th, 2003 (unless otherwise approved by the Department).
- On an annual basis, the FRCC will cause the removal of non-native vegetation in the San Dieguito river channel south perimeter and throughout the riparian areas of the completed 9-hole area.

In the river channel itself, the non-native plant removal will focus on hand removal of tamarisk; however, if other invasive exotic species are encountered, they will also be removed. The only equipment used in the river channel will be hand held chainsaws and other handheld tools. Removal of the tamarisk trees will be carefully undertaken in a manner to avoid, to the extent practicable, any adverse effect on the existing native riparian habitat. The tamarisk removal is scheduled to occur after September 15th of this year, but before the onset of the rainy season. If necessary due to early rains, tamarisk removal would be continued until the fall of 2004.

Enhancement activities shall comply with California Fish and Game Code Section 3503, which prohibits the take, possession or needless destruction of the nest or eggs of any bird. Therefore, unless a nesting survey is conducted by qualified biologist seven-days (or less) prior to riparian habitat enhancement activities, such activities will be conducted out-side of nesting season (March 15 through July 31). All nest sites shall be avoided until the nest is no longer active, and the young are no-longer dependent on the parent(s). A minimum 100-foot work exclusion zone will be established around an active nest by using flagging ribbon, or similar method. The work exclusion zone could be modified, based on the sensitivity of the species to human presence and activity. The Department shall be provided copies of the biologist's field notes for the nesting survey prior to commencing activities.

Construction practices common to work on both the river channel berm and the golf course construction will include pre-construction surveys by qualified biologists for nesting birds as well as any endangered or threatened species, including the least Bell's vireo among others. Construction will not commence without the advance approval of the Department in any area where nesting birds or any listed species are found. A one million dollar construction bond is posted in favor of the City of San Diego to financially guarantee the completion of the project elements, including the proposed riparian habitat enhancement and creation work described herein. FRCC will cause a post-construction monitoring report to be completed by a qualified biologist which will evaluate the effect of the environmental commitments and will make recommendations, if any are required, to address any documented shortcoming in the intended effect of the commitments. This document will be provided to the Department for review and

comment.

FRCC intends for the subject grading work to commence during June 2003. FRCC's contractor is Ranger Construction Industries, Inc. All earth moving work is scheduled for completion by October 15, 2003.

To help evaluate and monitor the success of these commitments, FRCC has given permission for site visits from any representative of the Department at any time. For safety and liability purposes, FRCC requests that the Department give as much advance notice as possible prior to visiting the site so that appropriate arrangements can be made. Please note that Department Peace Officers have authority per law to enter onto properties when they are carryout their law enforcement duties, and no statements in this letter should be interpreted to limit a Department Peace Officer's right of entry as defined by State law.

Conclusion

Based on the Department's review of the information you submitted and through a site visit (conducted by Don Chadwick of the Department), the Department has determined that a Streambed or Lake Alteration Agreement is not required for your project or activity because the project or activity 1) does not substantially divert, obstruct, or change any natural flow or bed, channel, or bank of a river, stream, or lake, or 2) use material from a streambed, or 3) substantially adversely effect existing fish or wildlife resources.

As a result, you may begin your project or activity if you have obtained all other necessary permits. If the project or activity changes from that stated in the submitted notification package above, a new notification shall be submitted to the Department.

Nothing in this letter authorizes the Operator to trespass on any land or property, nor does it relieve the Operator of responsibility for compliance with applicable federal, state, or local laws or ordinances. This letter does not constitute the Department's endorsement of the proposed project or activity, or assures the Department's concurrence with permits required form other agencies.

A copy of this letter and attachments thereto should be readily available at the work site(s) at all times during periods of active work and must be presented to any Department personnel, or personnel from another agency upon demand.

Sincerely,

4 R. Mandurak

Donald R. Chadwick Senior Environmental Scientist

Attachments:

- Table-1 Exhibit D-1 Exhibit D-2 Exhibit E Exhibit F Exhibit G-1 Exhibit G-2 Exhibit G-3 Exhibit H
- cc: Stream Alteration Compliance Team Cathy Cibit, City of San Diego

TABLE 1

SUMMARY OF RIPARIAN AREAS

The table below is a summary Project Description of the existing and proposed riparian areas associated with FRCC's proposed completion of the 9-holes of golf at its existing golf course.

Use Area Number	Area of Use	Riparian Acreage	Current Status	Project Description
1	Excavated Channel	65 <u>+</u> 1	Riparian vegetation with tamarisk and other non-native plants	Remove the non- native tamarisk.
2	Riparian Vegetation	13 (Area 'K') 6 (Area '8')	Riparian vegetation with non-native plants	Remove the non- native plants.
3	East Tributary	13	Riparian vegetation with non-native plants	Remove the non- native plants.
4	West - Water/Marsh Area (Created))	12	Rough graded; populated with non-native plants	Creation of 12 acres of water/marsh areas in the 9-hole proposed area.
RIPARIAN ACREAGE TOTAL		109		
5	Preserved Willow Pond	4	Intact.	N/A
6	Lakes (Existing)	19	Intact.	N/A
7	Wetland/Riparian Planting (Created)	12	Rough graded, populated with non-native plants.	To be created.
8	East – Water Marsh Area (Created)	3	Rough graded, populated with non-native plants.	To be created.
AQUATIC HABITAT TOTALS		147		

¹ The original 300-foot wide excavated channel has been widened to 550 feet where it turns west and has been fully vegetated. The entitlement to remove vegetation from the channel for flood conveyance purposes is neither valid any longer nor is it proposed by the applicant or the City.



U.S. DEPARTMENT OF TRANSPORTATION FEDERAL HIGHWAY ADMINISTRATION CALIFORNIA DIVISION 650 Capitol Mall, Suite 4-100 Sacramento, CA. 95814 March 2, 2006

> N REPLY REFER TO HDA-CA File #: 11-SD-00 El Camino Real Document #: P54022

Mr. Pedro Orso-Delgado, District Director California Department of Transportation District 11 P. O. Box 85406 San Diego, CA 92186-5406

Attention: Kevin Hovey, DLA NEPA Coordinator

MAR 0 6 RECTD

Dear Mr. Orso-Delgado:

SUBJECT: 11-SD-00 El Camino Real Bridge Widening project PES for the City of San Diego

Enclosed please find the original signed signature page and pages 6-31 through 6-43 for the subject project. Please note the change made to the statement pertaining to PM 2.5. Thank you for your assistance as we look forward to our continued discussions on this project.

If you have any questions, please contact Lisa Cathcart-Randall, Lead Transportation Specialist, at (916) 498-5048.

Sincerely, For

Gene K. Fong Division Administrator

Enclosure





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EXHIBIT 6-A PRELIMINARY ENVIRONMENTAL STUDIES (PES) FORM

PRELIMINARY ENVI	RONMEN	TA:	Ľ	ST	UDIES (PES) FORM	
TO: (DLAE) Gary Vettese (District) 11 (Address) 2829 J. Strick	(Fede	ral P	rog	. Pi	OJECT NUMBER: refix-Proj. No., Agreement No.) הכץ (נוצ)	
FROM: City of San Diego 1010 Second Avenue, Suite 1100, MS 611 San Diego, CA 92101 Abi Palaseyed 619-533-3756					N: Expected Start Date: 06/06	
Is this project "ON" the State Highway System?	FSTI	P: (1 (1	Pla Pag	n E ge #	Date) $T_{1e} 30^{10}$, 2012 is amended #) 56	
Yes No IF YES, STOP HERE and contact the District DLA	المعاد ا				ach Project Component is Programmed for STIP:	
regarding the completion of other environmental documentation		$\begin{array}{ccc} PE & FY \stackrel{o \ S}{\longrightarrow} \\ FW & FY \stackrel{o \ S}{\longrightarrow} \\ CONST & FY \stackrel{o \ L}{\longrightarrow} \\ \end{array}$				
PROJECT DESCRIPTION AS SHOWN IN FSTI (Via de la Valle to San Diejvito Re	P: El Cur	رز مه رو کر	R l	د ا	I Road and Bridge Willening Velle connection Nead S El Coning Real	
relieve traffic congestion, and improve consistency improvements include raising and widening El Cam higher, wider, and has deeper piles. <i>See continuation</i> PRELIMINARY DESIGN INFORMATION	nino Real roa at end of this	dway Exhi	ibil	nd : t.	replacing the bridge with a structure that is	
Does the project involve any of the following? Please check the ap additional pertinent information Yes No	propriate boxes :	Yes			on an attached map, plan, or layout including any	
Any vegetation removal				_	Railroad	
Bridge work (If yes, discuss bridge type/approach	n work)		K]]	Ramp closure	
Construct access roads Disposal/borrow site(s)		B	╞		Realignment	
Disposal/borrow site(s) Drainage/culverts		日	╞		Removal of trees R/W acquisition (If yes, attach map/APN#'s)	
Drainage/culverts Equipment staging Flooding			Ī		Road cut(s)	
Flooding			K		Temporary road/Detour	
Capacity Increasing Ground disturbance (outside of existing cut slope	and all work		X	_	Sound walls Stream channel work	
outside the toe of fill)						
Material site(s)			Ę		Temporary easements	
New alignment Off-pavement detour			╞		Utility relocation Widen existing roadway	
Will increase number of through lanes	·	Ħ	k		Part of larger or adjacent project	
REQUIRED ATTACHMENTS:					·····	

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EXAMINE FOR POTENTIAL EFFECTS ON THE ENVIRONMENT, DIRECT OR INDIRECT, AND ANSWER THE FOLLOWING QUESTIONS (Utilize the notes page at the end of the PES Form to document conclusions)

A. The Physical Environment	Yes	To Be <u>Determined</u>	<u>No</u>
 Is the project a Type I project as defined in 23 CFR 772.5(h) "construction on new location or the physical alteration of a existing highway, which significantly changes either the hor or vertical alignment or increases the number of through-trat lanes"? 	n rizontal		
2. Are there water resources (rivers, streams, bays, inlets, lakes drainage sloughs) within or immediately adjacent to the proj area?			
3. Is project within a designated sole-source aquifer?			\boxtimes
4. Is project within the State Coastal Zone?	\boxtimes		
5. Is the construction area located within a regulatory floodway within the base floodplain (100-year) elevation of a watercor lake?		, L	
 Is the project within or immediately adjacent to a Wild and S River System? 	Scenic		\boxtimes
7. Is there a potential for a federally listed, threatened, or endar species or their critical or sensitive habitat within the constru- area?			
8. Is there a potential for wetlands within the construction area	?		
9. Is there a potential for agricultural wetlands within the const area?	ruction		
 10. Air Quality a. Transportation Conformity (Air) Does Transportation Conformity apply? b. Is the project exempt from the requirement to determine conformity (40 CFR 93.126)? 			
11. Air Quality: Does the project have the potential for adverse emission impacts?		\boxtimes	
12. Is there a potential for prime or unique farmlands within or immediately adjacent to the construction area?	\boxtimes		
13. Is there a potential for hazardous materials (including under tanks) or hazardous material remains within or immediately adjacent to the construction area?	ground	\boxtimes	
14. Are there any publicly owned public parks, recreation areas, wildlife or waterfowl refuges [Section 4(f)] within construct area?			
15. Are there any aesthetically visual resources within the project	ct area?		

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The Sc	cial and Economic Environment	Yes	To Be <u>Determined</u>	<u>No</u>
16.	Will the project require any right-of-way, including partial or full takes? Consider construction easements and utility relocations.	\boxtimes		
17.	Is the project inconsistent with plans and goals adopted by the community?			\boxtimes
18.	Will the project result in the need for public services, including utilities other than those presently available or proposed?			\boxtimes
19.	Will the project involve changes in access control?	\boxtimes		
20.	Will project involve the use of a temporary road, detour or ramp closure?			\boxtimes
21.	Will the project reduce available parking?		\boxtimes	
22.	Will the project require future construction to fully utilize the design capabilities included in the proposed project?			
23.	Will the project generate public controversy based on potential environmental effects?			
24.	Will project construction encroach on State or federal Lands?	\boxtimes		
25.	Are there National Register listed or potentially eligible historic properties or archaeological resources [Section 106, Section 4(f)] NOTE: CT PQS DETERMINES APPLICABILITY OF QUESTION #25.		\boxtimes	
26.	Is there a potential for the introduction or spread of invasive species?			

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SECTION C, D & E - CHECK APPROPRIATE BOX TO INDICATE REQUIRED TECHNICAL STUDIES, COORDINATION, PERMITS OR APPROVALS

C.	REQUIRED TECHNICAL STUDIES	D.	COORDINATION	E.	PERMIT/APPROVALS
	NOISE STUDY _X_Traffic Related _X_Construction Related	_X_ _X_	FHWA FHWA		
Ø	WATER QUALITY STUDY _X_Discharge Dredged/Fill material (US waters) _Construction in Navigable Waters _Construction of Bridges/Causeways Across Navigable Waters _X_Construction of Bridge		U.S. Army Corps of Engineers U.S. Coast Guard California Regional Water Quality Control Board		Issues Section 404 Permit Section 10 Permit Approves Plans Water Quality Certification
	_X_Stream or Lake Alteration NEPA/404 MOU SOLE SOURCE AQUIFER	_^_	California Department of Fish & Game FHWA EPA (S.F. Regional Office)	_^_	Section 1601/03 Permit Contamination Threat
L X			State Coastal Zone Management agency (California Coastal Commission (CCC))		Coastal Zone Consistency
	FLOODPLAIN STUDY * WILD & SCENIC RIVERS		Federal Emergency Management Agency FHWA U.S. Department of Interior Heritage Conservation/Recreation	_X_	Floodplain Finding
		$_X_{-}$	Service FHWA California Department of Fish & Game	_x_	Sec 7 Consultation Incidental Take Permit
\boxtimes	WETLANDS STUDY * Agricultural Wetlands	_x_ _x_	FHWA/EPA U.S. Fish & Wildlife U.S. Army Corps of Engineers National Marine Fisheries Service Natural Resources Conservation Service	_x_	Wetlands Findings Venfies juris, wetlands Venfies agri, wetlands
\boxtimes	AIR QUALITY STUDY*	_x_	FHWA	_x_	Conformity Finding
Ø	FARMLANDS STUDY	_x_	Natural Resources Conservation Service U.S. Army Corps of Engineers	_x_	Verifies prime/unique Approves Conversions
	HAZARDOUS MATERIAL STUDY (Cleanup of Hazardous Material Sites)	_x_	 CALIF. EPA; Department of Toxic Substances Control, Biennial Reports, Lists of Active Annual Work plan Sites CALIF. Office of Planning and Research; Hazardous Wastes & Substances Sites List, List of Contaminated Sites LOCAL; Health & Human Services Dept., Hazardous Waste Operations Div 	,	

[•] FHWA has responsibility for consultation under regulation or interagency agreement or FHWA has responsibility for a finding or determination required by law, regulation or Executive Order.

C.	REQUIRED TECHNICAL STUDIES	Đ.	COORDINATION	E.	PERMIT/APPROVALS
\boxtimes	SECTION 4(f) EVALUATION *	_x_	FHWA	_x_	Makes Determination
		x	Public Official w/Jurisdictional Responsibility.		
			SHPO/ACHP (as appropriate)		
		x	DOI/DOA/HUD/USDA (as appropriate)		
⊠	SECTION 6(f) EVALUATION	_X_	Park Official		
		—	DOI		
⊠	VISUAL IMPACT STUDY (AESTHETICS)	_X_	FHWA		· · · · · · · · · · · · · · · · · · ·
đ	RELOCATION IMPACTS STUDY		State & Local Planning Departments		
	SOCIO-ECONOMIC STUDY		Airports, Schools, State and Local		<u>-</u>
		_	Planning Departments		
Ø	TRAFFIC	_x_	FHWA		
\boxtimes	SECTION 106 STUDY *				<u></u>
	Exempt Undertaking		Caltrans (PQS & DLAE approve APE)	_	Determines whether project qualifies as exempt
	_X_APE Map	_X_	Caltrans	_X_	Determines applicability of Minimal APE
	X Historic Property Survey Report (HPSR)	_x_	Caltrans Local Preservation groups and/or Native	_X_	Approves document Provides comment on
		X	American Tribes		concerns with project
		x	FHWA	_x_	Concurs or Consults with SHPO/ACHP
			SHPO	<u>X</u>	Concurs
Ø	CONSTRUCTION/ENCROACH ON STATE LANDS	;			
	_X_Under State Lands Commission Jurisdiction	_X_	State Lands Commission	_x_	General Permit/Revise General Plans
	Under Caltrans Jurisdiction	_	Caltrans	_X_	Encroachment Permit
◨	CONSTRUCTION/ENCROACHMENT		U.S. Bureau of Reclamation		Encroachment Permit
	ON FEDERAL LANDS		Private Land Owner	_	Right-of-Entry Permit
	Additional	studio	es may be required for other federal ag	encie	S.

F. Public Hearing and Public Availability

____ Not Required

- ____ Notices of Availability
- ____ Environmental Document ONLY

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<u>X</u> Opportunity for a Public Hearing <u>X</u> Public Hearing Required

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^{*} FHWA has responsibility for consultation under regulation or interagency agreement or FHWA has responsibility for a finding or determination required by law, regulation or Executive Order.

G. Preliminary Environmental Document Classification (NEPA)

Based on the evaluation of the project, the environmental document to be developed should be:

- _____ Environmental Impact Statement
- Environmental Assessment
- Categorical Exclusion, with required technical studies (involving federal action)
- Programmatic Categorical Exclusion, without required technical studies
- Programmatic Categorical Exclusion, with required technical studies (not involving federal action)

LOCAL AGENCY STAFF or CONSULTANT SIGNATURE

LOCAL AGENCY STAFF or CONSULTANT SIGNATURE
Prepared by: <u>A. Palasey</u> Date <u>2/8/06</u> Telephone #: <u>619-533</u> -3756
LOCAL AGENCY PROJECT ENGINEER SIGNATURE: This document was prepared under my supervision, in accordance with the Local Assistance Procedures Manual, Exhibit 6- B, "Instructions for Completing the Preliminary Environmental Study Form."
Signature local agency: <u>A. Palasey</u> Date: 2/8/06 Telephone #: 619-533-3756
THE FOLLOWING SIGNATURES ARE REQUIRED FOR ALL PCEs, REGULAR CEs, EAs, AND EISs
CALTRANS DISTRICT ENVIRONMENTAL OFFICE CHIEF (EOC) OR DESIGNEE SIGNATURE I have reviewed this Preliminary Environmental Study (PES) form and determined that the submittal is complete and sufficient. I concur with the studies to be performed and the recommended level of environmental document (if required). Signature EOC (or designee): Date: $2/4$ 0.6 Telephone #: $355-616-6653$
CALTRANS DISTRICT PROFESSIONALLY QUALIFIED STAFF (PQS) SIGNATURE Project does not meet definition of an "undertaking". No further review is necessary under Section 106. ("No" Sec B, #25) Project meets the definition of an "undertaking", involves the types of activities listed in Attachment 2 of the Section 106 PA, and, based on the information provided in the PES Form, does not have the potential to affect historic properties. ("No" Sec B, #25) Project meets the definition of an "undertaking" and involves the types of activities listed in Attachment 2 of the Section 106 PA, but the following additional procedures or information is meded, to determine the potential for effect: ("To Be Determined" Sec B, #25) Records Search The proposed undertaking to have the potential to affect historic properties. Further studies for 106 compliance are indicated in Sections OP and Potthis PES Form (Yer Sec B, #25) Signature PQS:
DLAE SIGNATURE: I have reviewed this Preliminary Environmental Study (PES) form and determined that the submittal is complete and sufficient. I concur with the studies to be performed and the recommended level of environmental document (if required). Signature DLAE: $Date: \frac{2/24}{06}$ Telephone #: $\frac{058-616-6523}{058-616-6523}$
THE FOLLOWING SIGNATURE IS REQUIRED FOR EAS, EISS, AND (WHEN RECOMMENDED BY THE EOC (or DESIGNEE), OR DLAE) FOR REGULAR CEs:
FHWA SIGNATURE: I concur with the studies to be performed and the recommended leyel of environmental document.
Signature FHWA: Date: <u>3./.06</u> Telephone #: <u>916.498.5</u> 048
Distribution: Original: District Local Assistance Engineer Copy: Local Agency Project Files, District EOC (or designee), District PQS

PRELIMINARY ENVIRONMENTAL INVESTIGATION NOTES TO SUPPORT THE CONCLUSIONS OF THIS CHECKLIST (May also include continuation of Detailed Project Description from Page.)

Continuation of Detailed Project Description

Scope of Work: All of the alternatives considered feasible and studied in detail involve these common elements:

- The roadway of El Camino Real would be raised above the 100-year flood level from San Dieguito Road to Via de la Valle.
- The bridge over the San Dieguito River would be replaced with a new structure that would be approximately the
 same length as the existing bridge, and raised above the 100-year flood level. The bridge would be supported on
 bridge piles that would be cast-in-drilled-hole construction, and would extend to a depth of approximately 27.4
 meters (90 feet) below the ground. Above the ground, the piles would become cylindrical finished concrete columns
 (piers).
- Via de la Valle would be widened to its ultimate width from the modified intersection with El Camino Real eastward to El Camino Real North. The drainage channel along the south edge of Via de la Valle would be relocated further south and enlarged to carry a 100-year flow from the upstream watershed. The corrugated metal pipe storm drain under Via de la Valle at El Camino Real North would be replaced with a concrete box sized to pass a 100-year flow from upstream.
- Project impacts to wetlands would be mitigated by enhancement and creation on the San Dieguito River Park JPA (former Boudreau) property west of the affected portion of El Camino Real.

Project Limits: The road being modified is El Camino Real from Via de la Valle on the north to San Dieguito Road on the south. This portion of El Camino Real, classified as a 2-lane collector, is approximately 2,400 feet long. This segment includes the 300-foot-long bridge over the San Dieguito River. Approximately 1,000 feet of Via de la Valle also would be widened to accommodate new turn lanes from El Camino Real, and a new, larger drainage ditch would be constructed along the southern edge of Via de la Valle, from existing El Camino Real to El Camino Real North.

Purpose and Need: The purposes of the proposed project are the following:

1) To provide structurally sound and operationally efficient access across the San Dieguito River during flood and non-flood events

- 2) To help achieve the goals of the SANDAG Regional Transportation Plan
- 3) To provide congestion relief in order to improve traffic flow
- 4) To obtain improved consistency with the applicable land use documents in the project area
- 5) To improve pedestrian and vehicular access to nearby coastal and recreational resources

The specific problems associated with the existing transportation facility involve several categories of needs. These are the following:

1) Capacity and transportation demand: The segment of El Camino Real proposed for widening currently operates at LOS F conditions. In the future year 2030, El Camino Real between Via de la Valle and San Dieguito Road is projected to carry 28,500 ADT, resulting in more severe congestion. The segment of Via de la Valle proposed for widening currently operates at LOS F conditions. In the future year 2030, Via de la Valle between El Camino Real and El Camino Real North is projected to carry 23,500 ADT, resulting in more severe congestion. If the El Camino Real and Via de la Valle road segments were widened to be 4-lane major roadways, they would operate at LOS C with the future projected traffic.

2) Roadway and bridge deficiencies: Based on the study of geotechnical and structural conditions conducted for this project (Ninyo & Moore 2005), the existing bridge is vulnerable to damage in a severe seismic event. The top 20 feet of the existing,

30-foot deep bridge piles are set in sediments that could liquefy in an earthquake. The geotechnical report concluded that the existing bridge foundation system may not be adequate to support the bridge service loads from traffic driving over it, and may not have an acceptable safety factor. Furthermore, the bridge abutment slopes could slide in a major earthquake. Hydraulic analyses to determine flood elevations in the river channel upstream and downstream of the bridge indicate that the 100-year water surface elevation would rise above the bottom of the bridge, but would not overtop the bridge deck. An existing buried rip rap layer installed to protect an adjacent sewer pipeline under the river protects the existing bridge foundation footings from scour. However, without the rip rap "blanket," potential scour could extend as deep as elevation 15 feet below msl. The project proposes to correct the bridge deficiency issues by replacing the structure completely.

3) Local land use plan and policy consistency: The Framework Plan designates El Camino Real as a four-lane Major Arterial with an LOS of B. However, El Camino Real is currently a two-lane collector operating at LOS F. Therefore, this project proposes modifications to improve compatibility with the approved planning documents for the area in terms of road classification and LOS.

4) Regional transportation plan consistency: The Regional Transit Vision includes goals such as making walking "more convenient, faster, and safer," and encouraging "more smoothly flowing automobile traffic." Currently, there are no sidewalks, no dedicated horse paths, and no designated bicycle lanes on the portion of El Camino Real addressed in this EIR. The bridge is narrow and provides no facilities for pedestrians. There are no controlled pedestrian or equestrian crossings. The project is proposed to improve consistency with the Regional Transit Vision by including pedestrian, equestrian, and bicycle elements.

Logical Termini and Independent Utility:

<u>Southern Terminus</u> - The southern terminus for the project is at San Dieguito Road. This location was selected for the following reasons: The design deficiencies the proposed project would correct are focused on the bridge over the San Dieguito River. If the bridge is raised higher to be above the 100-year flood level, the road to the south must be higher to line up vertically with the bridge. However, the higher road elevation could transition back to existing ground elevation at San Dieguito Road. El Camino Real south of San Dieguito Road is not in the 100-year floodplain, so there is no need to raise the road south of this point. Also, in terms of related projects, other entities are taking responsibility for widening the southern segment of El Camino Real from San Dieguito Road to the existing full width improvements north of Sea Country Lane, a distance of approximately 0.9 mile. The planned improvements for the portion of El Camino Real south of San Dieguito Road to the existing full width improvements north of San Dieguito Road include widening to four lanes, and providing bike lanes and a raised median. This portion of El Camino Real is addressed in a separate environmental document being prepared by others. Design and environmental documentation of the two segments are being closely coordinated.

Northern/Eastern Terminus - The northern/eastern terminus for the project is at the intersection of Via de la Valle and El Camino Real North. This location was selected for the following reasons: This is the northernmost extent of the portion of El Camino Real affected by the proposed change in elevation of the bridge. This is also the road segment that is currently operating at a congested traffic level of service (LOS F). The eastern end terminus for the project at the intersection of Via de la Valle and El Camino Real North was selected for the following reasons: City of San Diego design standards for transitioning from the modified intersection at the project portion of El Camino Real and Via de la Valle require widening eastward along Via de la Valle for a minimum of approximately 800 feet. To avoid impacts to developed property and drainage facilities on the northern edge of Via de la Valle, the widening is proposed to hold the north curb line and extend to the south. The existing drainage ditch parallel to the southern edge of Via de la Valle would be filled by this part of the project, and would have to be replaced adjacent to the widened road. Due to inadequacies in the existing hydraulic system, this ditch should be widened, and it is also proposed to vegetate the replacement ditch with brackish marsh. In order to place the new vegetated ditch in its permanent location, the transitional widening of Via de la Valle would be constructed at its ultimate width eastward for approximately 1,080 feet to El Camino Real North. In this way, the wetlands created in the new ditch would not be disturbed by the eventual plan to widen Via de la Valle to four lanes. Arrangement for right of way from the private property south of Via de la Valle would be most efficient and fair if the land ultimately needed is obtained at one time. Also, future, costly changes to the storm drain system would be avoided if the system components (box culvert under Via de la Valle and vegetated drainage ditch parallel to the road) were installed in their ultimate location.

NOTES TO SUPPORT THE CONCLUSIONS OF THIS CHECKLIST

1. This project proposes to add an additional through lane for each side of the roadway (to meet existing and 20-year projected traffic needs), along with other appurtenant improvements, including pedestrian walkways and bike lanes.

The existing bridge would be replaced with a seismically designed structure. El Camino Real is currently a two-lane rural roadway, and not a highway. The horizontal alignment will remain essentially the same. However, the vertical alignment will be raised to bring the bridge above the 100-year flood level, and for the roadway/bridge approaches to return to existing gradeline at the northern and southern ends (Via de la Valle and San Dieguito Road, respectively) in accordance with acceptable design standards. Meeting design standards for vertical curves will also enable the roadway to be above the 100-year flood level so the bridge is accessible in flood conditions.

- 2. The San Dieguito River flows under the bridge.
- 3. The site is in San Diego County, which has no Sole-source aquifers.
- 4. On the City of San Diego Coastal Development Permit Jurisdiction Map C-730.1 42 of 44, the Coastal Zone boundary within the project area is shown on the alignment of existing El Camino Real between Via de la Valle and San Dieguito Road. The Coastal Zone is west of the boundary line, and the Coastal Development Permit for project impacts within the Coastal Zone would be issued by the City of San Diego. The San Dieguito River corridor west of El Camino Real is indicated as being within Coastal Commission Appeal Jurisdiction on Map C-730.1 42 of 44.
- 5. The project study area is in the 100-year floodplain of the San Dieguito River. Floodplain mapping conducted for the Federal Emergency Management Agency (FEMA) in the mid 1980s was not fully accepted, and the floodplain is noted as approximate only on the floodplain maps.
- 6. The San Dieguito River is not classified as a Wild and Scenic River.
- 7. A joint letter was received from the USFWS and CDFG on December 12, 2002 presenting their concerns regarding the proposed project. Focused surveys and habitat assessments were conducted to address these concerns. The USFWS has indicated that the project area would include possible habitat for the federally-endangered light-footed clapper rail (*Rallus longirostris levipes*) and San Diego ambrosia (*Ambrosia pumila*). Habitat assessments were conducted for Quino checkerspot butterfly (*Euphydryas editha quino*), Pacific pocket mouse (*Perognathus longimembris pacificus*) and light-footed clapper rail. Focused surveys also were conducted for federally endangered arroyo toad and least Bell's vireo. Multiple pairs of clapper rail have been detected at and upstream of the bridge during surveys conducted in 2004 and 2005. In 2004, two least Bell's vireo territories were occupied in the project area. No suitable habitat and no occurrences were detected for San Diego ambrosia, Quino checkerspot butterfly, Pacific pocket mouse, arroyo toad, or southwestern willow flycatcher.
- 8. Based on biological resources surveys conducted in 1998 and 2003, and wetland delineations conducted in 1998 and 2004, the vegetation types occurring in the project area include southern willow scrub, disturbed southern willow scrub, disturbed mule-fat scrub, disturbed coastal brackish marsh, and disturbed southern coastal salt marsh. Wetland impacts, depending upon alternative, range between 4.36 acres and 4.57 acres.
- 9. Based on the biological resources surveys conducted previously, there is the potential for agricultural wetlands in the study area.
- 10. The proposed project is included in the 2030 RTP Technical Appendix 9, Table TA 9.1, line item 16 (SANDAG 2003a) and the 2004 RTIP Amendment No. 1, City of San Diego Section, MPO ID SD 34 (SANDAG 2004). The air quality analysis and conformity finding for the 2030 RTP was prepared by SANDAG (SANDAG 2003b), and the conformity finding was approved by the FHWA and FTA on April 9, 2003 (USDOT 2003). The air quality conformity determination for the 2004 RTIP Amendment No. 1 was approved by the USDOT on December 8, 2004 (FHWA 2004a). The design of the project is similar to that anticipated in the RTP and the RTIP.
- 11. The SDAB was redesignated as a CO attainment area subsequent to the passage of the 1990 Clean Air Act amendments. Continued attainment has been verified with the San Diego APCD. The project would not substantially increase traffic volumes or the percentage of vehicles operating in cold start mode, or increase the average delay at signalized intersections operating at level of service E or F. Potential release of PM 10 during construction is to be addressed in the Air Quality Study. The project will not require a P.M 2.5 hot spot analysis since it is in an attainment area.
- 12. The 2000 Important Farmland Map for San Diego County indicates that there is no Prime Farmland within the study area. However, project features and proposed mitigation for biological resources would affect Farmland of

Statewide Importance and Farmland of Local Importance. The only land being farmed in the study area as of 2004 is the property west of El Camino Real and south of the river. This area is classified as Farmland of Statewide Importance. Wetlands creation for mitigation purposes is proposed for this property, which has been purchased by the San Dieguito River Park JPA for eventual restoration to sensitive biological resources, including wetlands.

- 13. Federal, state and local environmental databases of reported hazardous waste sites for the project were reviewed to determine if any known sites are within the project area, and a report was provided by Environmental Data Resources, Inc. (EDR 2003). The databases were reviewed to evaluate the potential for subsurface soil and /or groundwater contamination to be present on the site from an unauthorized release of hazardous materials or wastes. None of the information retrieved indicates ongoing hazardous materials issues exist that could cause contamination of soil or groundwater that would interfere with construction of the proposed project components.
- 14. Three potential 4(f) resources in the project area: Del Mar Horse Park on the west side of El Camino Real, which is owned by the 22nd District Agricultural Association, a state agency; the Polo Club field on the east side of El Camino Real, which is on property owned by the City of San Diego; and the Fairbanks Ranch Country Club Golf Course, which is on property owned by the City of San Diego. Studies to be included in the EA indicate none of these properties qualify as 4(f) resources, however. Del Mar Horsepark is not protected by Section 4(f) because it functions primarily for commercial purposes rather than recreation and because visitation during its normal operating hours is permitted only to a select group of paying customers and not the entire public. Also, in terms of Section 4(f) applicability, the Del Mar Horsepark is rightly considered a fairground rather than a recreational facility. Similarly for the Polo Club fields, although they are publicly owned, the entire public is not permitted visitation at any time. Use of the polo fields is restricted to the playing membership, who must pay for the use, and therefore represent a select group. Also, the public must pay to view the recreational activities that occur onsite. Therefore, the provisions of Section 4(f) are not triggered for the Polo Club property. Use of the Fairbanks Ranch Country Club Golf Course is restricted to members, who are a select group. The golf course has set daily operation times when members are allowed to play. Also, the golf course does not play a critical role in meeting park, recreational, or refuge objectives of the City of San Diego, the responsible entity, since it is one of many golf courses in the City limits, and is privately operated with use restricted to members only. Therefore, the provisions of Section 4(f) are not triggered for the Fairbanks Ranch Country Club Golf Course property.
- 15. The project area is a visually attractive rural area. Visual impact studies will be conducted during the environmental documentation process.
- 16. Partial takes along the frontage of El Camino Real would be needed from several properties. The properties affected differ with the various alternatives considered feasible and studied in detail in the environmental document.
- 17. The affected portion of El Camino Real is in the northwestern part of the North City Future Urbanizing Area (NCFUA), a diverse planning area that extends from I-5 on the west to I-15 on the east, and from Los Penasquitos Canyon on the south to Santa Fe Valley on the north. The NCFUA Framework Plan (City of San Diego 1995) was initially adopted by the City Council in 1992 as an amendment to the General Plan. The Framework Plan designates El Camino Real as a four-lane Major Arterial with an LOS of B. However, El Camino Real is currently a two-lane collector operating at LOS F. Therefore, this project proposes modifications to improve compatibility with the approved planning documents for the area in terms of road classification and LOS. El Camino Real is identified in the City of San Diego General Plan Transportation Element.
- 18. The project will not generate the need for additional public services, although some utilities may need to be relocated, depending on the alternative selected.
- 19. The project would not impact access to a highway system. However, access to businesses along the roadway, including Mary's Tack and Feed, Del Mar Horse Park, and the Polo Club field would be affected by the change in vertical alignment and the road widening.
- 20. The project would not change local traffic patterns in the short or long term. The basic concept of construction of the raised and widened road and bridge is to huild one side or the other completely, without closing the existing road or bridge, then routing traffic to the new two-lane facility to allow demolition of the existing bridge and construction of the new adjacent two-lane facility. All of the alternatives are considered constructible without closing this segment of El Camino Real and requiring detours. One alternative located east of the existing El Camino Real alignment would offer the ability to construct the entire bridge and the four-lane roadway north of the bridge to Via

EXHIBIT 6-A Preliminary Environmental Studies (PES) Form

de la Valle completely separately from existing El Camino Real, and therefore, without the construction phasing required for the other alternatives. South of the bridge, the new road for this alternative would be constructed in phases, with the eastern half constructed first, unconstrained by existing El Camino Real. Then traffic would be moved to the new eastern half, and the western half of the new road would be constructed.

- 21. No parking is allowed on El Camino Real or Via de la Valle in the project area. Parking spaces in the lots north of Via de la Valle would not be affected by any of the alternatives. Spaces in the upper lot of Mary's Tack and Feed, and in the veterinary hospital parking lot would not be affected by any of the alternatives. Parking in the lower parking lot of Mary's Tack and Feed, which is not striped for parking, could be reduced by as much as an estimated 5 spaces, based on 8.5 feet width for parking spaces in a length of approximately 40 feet, depending on the alternative. Parking in the dirt lot at Horsepark would be affected only by one alternative that would extend approximately 70 feet into usable parking area on the dirt lot parallel to El Camino Real. In the affected area, one row of parking spaces approximately 600 feet long (south from the entrance to the river) would be eliminated by the widened road and slope. Assuming 8.5-foot wide parking spaces, approximately 70 parking spaces on Horsepark would be eliminated by this alternative. This number of spaces would represent approximately 17 percent of the estimated 420 available spaces in the parking area. To the extent that occasional parking occurs on the privately owned vacant property south of Via de la Valle and east of El Camino Real, this parking would be reduced along the western edge of the property for various road alignment alternatives, and along the northern edge of this property due to the widening of Via de la Valle, and construction of a new, wider drainage channel parallel to Via de la Valle. However, there is no master plan for this site to indicate where and when parking occurs on this property.
- 22. The road widening has independent utility and would not need future construction to improve road capacity, bridge safety, and flood protection along the portion of El Camino Real addressed by this project.
- 23. Public controversy may be raised over this project due to potential environmental effects and particular properties affected by the selected alignment alternative. Federal, state, and local guidelines for soliciting and incorporating public comment and input will be followed. Public input was sought during the initial project development and alternatives analysis.
- 24. The project may encroach on land owned by the 22nd District Agricultural Association, a state agency, depending on the selected alignment alternative.
- 25. Specific archaeological and historical studies have been conducted of the entire study area, to determine the presence of National Register listed or potentially eligible historic properties. No important archaeological resources were located within the project APE. A portion of site CA-SDI-686 Locus C was identified by the record search as within the cultural resources study area but the locus has been destroyed and was not relocated within the project APE. The potential for buried and undiscovered archaeological resources does exist within the APE, which is essentially made up of Holocene alluvium. Archaeological monitoring and Native American monitoring is recommended during earth moving activities associated with the project in order to identify buried cultural resources that may be uncovered during construction. Pursuant to the Caltrans/SHPO/FHWA Memorandum of Understanding for the evaluation of post-1950 buildings and pre-1950 buildings, all buildings and structures within the APE were inspected and photographed during the field survey. None of the buildings less than 50 years old reveals any exceptional importance necessary to meet the National Register's criteria considerations. The property located at El Camino Real and San Dieguito Road contains three buildings older than 50 years and later buildings that were moved on the property, in addition to buildings of a recent date that were constructed on site. An early 1910s Craftsman farmhouse meets the criteria for significance under CEQA. However, the road-widening project would not affect this historic resource. Project impacts would be more than 900 feet away from this building and would not affect the qualities of this structure or integrity of setting that makes it a significant historical resource under CEQA. There are no resources associated with the Mexican rancho period, nor with 19th century settlement or agriculture. Loss of farm groves and land to post World War II and recent development precludes any continued association with that theme, and there are no remaining structures associated with early railroad development.

The El Camino Real Bridge crossing San Dieguito River in the APE, was classified as Category 5 in the Caltrans Historic Bridge Inventory. The structure has been evaluated for significance twice, most recently in 1998. It was found not to be significant and in accordance with existing policy does not require reevaluation at this time.

26. The project would involve re-vegetation of areas disturbed during construction, and creation/enhancement of wetlands for mitigation of permanent impacts. Use of invasive plants, or any non-native landscaping/planting as

part of the project would be prohibited. Impacts to sensitive wetland habitats would be mitigated by: 1) creating habitat of equal value in the vicinity of the project; 2) enhancing degraded wetland habitats in the project vicinity through the removal of exotic plant species; and, 3) restoring wetland areas impacted during construction to their pre-project condition. Mitigation for impacts to sensitive upland habitats, i.e., coastal sage scrub, will be mitigated through contribution to the City's Habitat Acquisition Fund. Brackish marsh creation includes perennial herbaceous species established from container stock. The dominant species include a mixture of traditional fresh and salt marsh species including pickleweed (Salicornia virginica), alkali heath (Frankenia salina), saltgrass (Distichlis spicata), spiny rush (Juncus acutus), southern cattail (Typha domingensis), bulrush (Scirpus maritimus) and California bulrush (Scirpus californicus). Riparian scrub, composed of mule-fat/southern willow scrub habitat will be planted with mule-fat (Baccharis salicifolia), willow species (Salix spp.) and selected understory elements. Additional shrub and grass species are proposed for the riparian scrub areas to provide diversity and food sources for wildlife. These include San Diego marsh elder (Iva hayesiana), giant wild rye (Elymus condensatus) and California rose (Rosa californica). Several species will be planted in the revegetation site from seed, including western ragweed (Ambrosia psylostachya), Douglas mugwort (Artemisia douglasiana), Palmer's sage wort (Artemisia palmeri), creeping wild rye (Leymus triticoides) and great marsh evening-primrose (Oenothera hookeri). The plant palette for the creation of high salt marsh is similar to that for brackish marsh, with the exception of Scirpus and Juncus species. The intent of this mitigation component is to create non-tidal high salt marsh that is self-sufficient and of higher quality than that impacted by the project.

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MEMORANDUM

To: KEVIN HOVEY Senior Environmental Planner Environmental / Local Assistance Date: April 10, 2006

File: El Camino Real Bridge #57C-0042, San Diego City

From: MARTIN D. ROSEN

Senior Environmental Planner/PQS-P.I. Prehistoric Archaeology

Subject: Completion of Section 106 and Filing of Historic Property Survey Report (HPSR)

Attached is the HPSR for this undertaking. Since the City is using federal funding for the project, cultural resource studies had to comply with the requirements of Section 106 of the National Historic Preservation Act, and its regulations, as promulgated in 36CFR§800, and as specifically handled in accordance with the stipulations of the Section 106 Programmatic Agreement (PA), which became effective January 1, 2004.

The City of San Diego proposes to widen El Camino Real between Via de la Valle and San Dieguito Road and either widen or replace the existing El Camino Real Bridge (#57C-0042). City of San Diego contracted environmental studies to Earth Tech, Hon Consulting, and Tierra Environmental Services; Tierra was subcontracted to handle the cultural resource studies, and they subcontracted with Mooney · Jones & Stokes to do the historic architectural study. I prepared the Historic Property Survey Report (HPSR), based on information collected and synthesized by Tierra; Tierra prepared the Archaeological Survey Report (ASR) and Late Discovery Plan; and Mooney · Jones & Stokes prepared the Historical Resource Evaluation Report (HRER). All cultural resource documents were prepared under my oversight. The HRER was reviewed and approved with revisions, which have been incorporated into the final attached document, by Caltrans Principal Architectural Historian Andrew Hope. Due to Area of Potential Effects (APE) changes, the HRER ultimately became superfluous; but it is included because of the valuable information it contains on resources that are now located outside the project's APE. One nearby property, the Barnett House, appears to be eligible to the National Register of Historic Places; but because it no longer occurs near the APE, no concurrence from the State Historic Preservation Officer (SHPO) is being sought at this time.

Because there are no cultural resources within the APE, and because no concurrence on any historic property determination is being sought from the SHPO, the Section 106 finding for this undertaking is No Historic Properties Affected. The attached HPSR was prepared in accordance with *PA* stipulation IX.A(2). In accordance with the same stipulation, the document does not need to be reviewed by the SHPO or the Federal Highway Administration (FHWA). With this document, Section 106 responsibilities have been satisfied; the effective date being March 27, 2006, when the document was finalized by myself and reviewed by Kevin Hovey. No further cultural resource studies or evaluations will be required unless there are changes to the APE. If there are any questions or comments regarding the above or the attached, please do not hesitate to contact me (858.616.6615, mrosen@dot.ca.gov).

C: KCrafts/D-11 Cult Res. Files JHupp/HQ/CCSO SCIC/SDSU ATomera/D-11 DLAE w/o Attachment



United States Department of the Interior

FISH AND WILDLIFE SERVICE Ecological Services Carlsbad Fish and Wildlife Office 6010 Hidden Valley Road Carlsbad, California 92009



In Reply Refer To: FWS-SDG-3236.2

JUN 1 1 2003

Mr. Chris Norby Principal Biologist Tierra Environmental Services 9903 Businesspark Ave., Ste. E San Diego California 92131-1120

Re: Request for Candidate, Proposed, Threatened, or Endangered Species List for the Proposed El Camino Real Road and Bridge Widening Project, San Diego County, California

Dear Mr. Norby:

The U.S. Fish and Wildlife Service (Service) has reviewed the information provided in your May 1, 2003, letter to assess the potential presence of federally listed threatened, endangered, or proposed species at the proposed project site. We do not have site specific information for your project area. However, to assist you in evaluating whether or not the proposed project may affect listed species, we are providing the attached list of species that occur in the general project area. We recommend that you seek assistance from a biologist familiar with your project site, and with the listed species to assess the potential for direct, indirect, and cumulative effects likely to result from the proposed activity. You should also contact the California Department of Fish and Game for State-listed and sensitive species that may occur in the area of the proposed project. Please note that State-listed species are protected under the provisions of the California Endangered Species Act.

If it is determined that the proposed project may affect a listed or proposed species, or the designation of any critical habitat you should initiate consultation (or conference for proposed species) with the Service pursuant to section 7 of the Endangered Species Act of 1973, as amended (Act). Informal consultation may be used to exchange information and resolve conflicts with respect to listed species prior to a written request for formal consultation.

Should you have any questions regarding the species listed or your responsibilities under the Act, please call John DiGregoria of my staff at (760) 431-9440.

Sincerely,

Ru (mn Canange Peter C. Sorensen Acting Assistant Field Supervisor

Enclosure

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Listed Endangered, Threatened and Proposed Species that may occur in the vicinity of the El Camino Real Bridge at the San Dieguito River in San Diego County, California

Common Name	Scientific Name	Status
BIRDS light-footed clapper rail	Rallus longirostris levipes	E
<u>PLANTS</u> San Diego ambrosia	Ambrosia pumila	Е

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khon@honconsultinginc.com

From:	<john_digregoria@r1.fws.gov></john_digregoria@r1.fws.gov>
To:	<tierraenv@aol.com></tierraenv@aol.com>
Sent:	Wednesday, October 13, 2004 3:51 PM
Subject:	Re: El Camino Real

Chris,

Based on your July 23, 2002 survey report and current conditions, there is no need to conduct further arroyo toad surveys for the El Camino Real Bridge project at the San Dieguito River.

John DiGregoria Fish and Wildlife Biologist Carlsbad Fish and Wildlife Office 6010 Hidden Valley Road Carlsbad, California 92009 760 431-9440 fax 431-5901 John DiGregoria@r1.fws.goy

TierraEnv@aol.comTo:John_Digregoria@fws.gov10/13/2004 10:11cc:AMSubject: El Camino Real

John: The City of San Diego has asked me to contact you regarding arroyo toad at the El Camino Real Bridge project site. Several years ago, Jessie Delaya insisted that I do protocol surveys for the toad even though it was my opinion that there was no appropriate breeding habitat. Given the current situation with brackish conditions and clapper rails, do you agree? Can you please e-mail me regarding the need to do updated surveys for this species?

Thanks

Chris

Chris Nordby Principal Biologist



JOINT POWERS AUTHORITY BOARD OF DIRECTORS

Chair Jerry Finnell Del Mar City Council

Vice-Chair Ed Gallo Escondido City Council

Betty Rexford Poway City Council

Dianne Jacob Supervisor, County of San Diego

Pam Slater-Price Supervisor, County of San Diego

Bnan Malenschein San Diego City Council

Scott Peters San Diego City Council

Lesa Heebner Solana Beach City Council

Dr. Philip Pryde Citizens Advisory Committee

Kelly Burt, Ex Officio 22nd District Agricultural Assoc

Dick Bobertz Executive Director San Dieguito River Valley Regional Open Space Park 18372 Sycamore Creek Road Escondido, CA 92025 (858) 674-2270 Fax (858) 674-2280 www.sdrp.org

April 17, 2006

Richard Leja, Senior Civil Engineer City of San Diego Transportation Engineering Division, Engineering and Capital Projects 1010 Second Avenue, Suite 1200 San Diego, CA 92101

Dear Richard:

SUBJECT: El Camino Real Bridge Replacement

The City staff/consultant team that is working on the El Camino Real Bridge Replacement project has proposed an alternative that would not demolish the existing El Camino Real bridge when the new structure is constructed, but would keep it in place for use as a public trail for hikers, bicyclists and equestrians. The San Dieguito River Park Joint Powers Authority (JPA) staff was asked if we support this concept and would we be willing to assume responsibility for it when it becomes a trail. After discussing the concept with our Trails Committee, I am pleased to inform you that we do believe that the bridge would serve well as a multi-use trail, and that it would enable trail users who are south of the San Dieguito River to cross the river and join the Coast to Crest Trail.

One issue that was raised as a concern is the existing railing. We believe that the height and spacing of the railing would not meet current codes for a trail railing for pedestrians, bicyclists or equestrians. In addition, the railing appears to be in a poor condition that would need considerable maintenance. We have been informed by one of your consultants that the City is considering retaining the existing railing and adding a 42-inch high chain link fence. A chain link fence would not be an aesthetically acceptable railing for trail users or for drivers on the new bridge to view. We would like to work with you and your consultants to find an aesthetic, safe and economic solution to the railing issue.

The JPA staff would be willing to work with the City to pursue an agreement for the JPA to accept ownership and maintenance responsibility of the existing El Camino Real Bridge if it is preserved as a multi-use trail, provided that the railing is replaced or repaired to meet standards as noted above. Formal acceptance would require JPA Board action.

Sincerely, Dick Probertz, Dick Bobertz,

Executive Director

cc:

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Abi Palasayed, Transportation Engineering Div., City of San Diego Katherine Hon, Hon Consulting



JOINT POWERS AUTHORITY BOARD OF DIRECTORS

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Scott Peters San Diego City Council

Lesa Heebner Solana Beach City Council

Dr. Philip Pryde Citizens Advisory Committee

Kelly Burt, Ex Officio 22nd District Agricultural Assoc.

Dick Bobertz Executive Director Regional Open Space Park 18372 Sycamore Creek Road Escondido, CA 92025 (858) 674-2270 Fax (858) 674-2280 www.sdrp.org

San Dieguito River Valley

April 17, 2006

Richard Leja, Senior Civil Engineer City of San Diego Transportation Engineering Division, Engineering and Capital Projects 1010 Second Avenue, Suite 1200 San Diego, CA 92101

Dear Richard:

SUBJECT: El Camino Real Bridge Mitigation

The City staff/consultant team that is working on the El Camino Real Bridge Replacement project has proposed to use the adjacent Boudreau floodplain property as a mitigation site for wetland impacts associated with the El Camino Real Bridge Replacement project. The Boudreau property is now owned by the San Dieguito River Park Joint Powers Authority (JPA).

We would be pleased to have the City create wetlands on the former Boudreau property, as that is the intended use of the site. In fact, the San Dieguito River Valley Conservancy prepared a conceptual restoration plan for the site. I understand that your consultant, Chris Nordby, who was also the biologist who prepared that conceptual restoration plan, has been retained by the City to prepare a mitigation plan for the City on the former Boudreau property. I also understand that the City's mitigation needs do not exactly match the conceptual restoration plan design, and that you and Mr. Nordby are exploring alternative designs that would provide the City with the mitigation habitat and acreage that you need.

I propose that the City and the JPA enter into a Memorandum of Agreement that contains the following terms:

- The JPA will not require payment from the City for the use of the property.
- The City will include in its plan and will create when it creates its own mitigation acreage, three acres of salt marsh that is a JPA mitigation requirement for the Coast to Crest Trail and Wetland Treatment Ponds in the San Dieguito Lagoon.
- The City will be responsible for maintaining and monitoring the restoration site for the first five years or until the project meets its success criteria.

• At the time the project is approved, the City will provide a non-wasting endowment to the JPA that will provide income to enable the JPA to manage the restored wetlands after the City's project meets its success criteria. The amount of the endowment depends on the degree of surveying, reporting or long-term maintenance is required by the Resources Agency

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If you are interested in pursuing the use of the former Boudreau property for your mitigation needs, please contact me so that we can proceed with the preparation of the MOA.

Sincerely, Dick Bobertz.

Executive Director

cc:

Abi Palasayed, Transportation Engineering Div., City of San Diego Katherine Hon, Hon Consulting

CITY OF SAN DIEGO EL CAMINO REAL ROAD/BRIDGE PROJECT MEETING SUMMARY JULY 14, 2004

ATTENDEES						
NAME	AFFILIATION	PHONE	E-MAIL			
John DiGregoria	USFWS	760-431-9440	John_Digregoria@fws.gov			
Stephanie Hall	USACOE Regulatory	213-452-3410	shall@spl.usace.army.mil			
Bob Hoffman	NOAA Fisheries	562-980-4043	Bob.hoffman@noaa.gov			
Larry Vinzant	FHWA	telecon	Larry.vinzant@fhwa.dot.gov			
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Tamara Spear	CDFG	858-467-4223	tspear@dfg.ca.gov			
Tim Dillingham	CDFG	858-467-4204	tdilling@dfg.ca.gov			
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Ellen Lirley	Coastal Commission	619-767-2370	elirley@coastal.ca.gov			
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Bruce April	Caltrans – Env.	858-616-6614	Bruce.april@dot.ca.gov			
Gladys Baird	Caltrans – Env.	858-616-6632	Gladys.t.baird@dot.ca.gov			
Sue Scatolini	Caltrans – Env.	858-616-6640	Susan.scatolini@dot.ca.gov			
David Nagy	Caltrans – Env.	858-616-6650	David.l.nagy@dot.ca.gov			
Anthony Tomera	Caltrans Local Assist.	858-616-6531	Anthony_Tomera@dot.ca.gov			
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Abi Palaseyed	City of San Diego	619-533-3756	apalaseyed@sandiego.gov			
Mark Weis	City of San Diego	619-533-3791	mweis@sandiego.gov			
Kerry Santoro	City of San Diego	619-533-3749	ksantoro@sandiego.gov			
Donna Clark	City of San Diego	619-446-5387	declark@sandiego.gov			
Chris Nordby	Tierra Environmental	858-578-9064	Tierraenv@aol.com			
Katherine Hon	Hon Consulting Inc.	619-294-8990	khon@honconsultinginc.com			
Chris Knopp	PDC	619-881-3390	chrisk@projectdesign.com			

DISCUSSION SUMMARY

1. Hydraulic effects of river widening are crucial in the decision of whether or not this is a desirable project feature. Potential changes in flow characteristics upstream and downstream, and in the 2-year, 10-year, and 100-year flow are all of concern and need to be understood by the agencies before they can give an opinion about river widening. They also would like to know if hydraulics vary with the different river widening concepts (South Only, North Only, and North & South). How does the flow regime change with removal of the bottleneck at the bridge?

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- 2. All the agencies would appreciate an explanation by Dr. Howard Chang, who has conducted extensive hydraulic modeling for the San Dieguito Lagoon Wetlands Restoration Project. They would like to have a letter report from Dr. Chang a week in advance of the next meeting, and have a presentation by Dr. Chang at the next meeting.
- 3. Effects on groundwater of river widening are also of concern and an important factor. Would a wider river reduce groundwater flow downstream in low-flow conditions because there would be more infiltration upstream? If there is increased infiltration, where would that water re-surface?
- 4. Impacts of the road/bridge project must be evaluated in the context of the potential impacts on the San Dieguito Lagoon Wetlands Restoration Project. The issue of how river widening could affect the clapper rail habitat also is important, since it is documented that there are at least 6 pair in the river at/upstream of the bridge. The effects could be beneficial or detrimental, depending on how the river hydraulics are affected.
- 5. If there is a benefit to the JPA/SCE project, benefit to river hydraulics, and benefit to clapper rail habitat, USFWS would not be opposed to the river widening concept.
- 6. Mitigation areas within the watershed are desirable. There may be mitigation land available in a potential mitigation bank created as part of the San Dieguito Lagoon Wetlands Restoration Project, and/or there may be suitable land within the lagoon project area that is not currently planned for wetlands development.
- 7. The additional wetlands impacts indicated in Table 1 of the June 17 letter as caused by river widening are conservative. With proper construction restrictions and design, edge effects may be reduced to be near zero.
- 8. The agencies agreed that **permanent** impacts are where valued vegetation is dug up and/or filled in, even if replacement vegetation is planted nearby. Therefore, the impacts to the drainage ditches would be considered permanent.
- 9. Although disturbance from activities in construction easements is often considered a temporary impact, there is a temporal consideration, according to USFWS. If the duration of construction is lengthy, impacts in a construction easement may be considered permanent. In the case of El Camino Real, the river in the project area encompasses inhabited clapper rail habitat, and the construction time would be extensive (estimated as at least 18 months), so construction easements probably would be considered permanent impacts.
- 10. The Corps of Engineers generally only counts permanent impacts when they determine if a project is or is not in the NEPA/404 Integration Process. The

threshold for being in the NEPA/404 process is 5 acres or more of permanent wetlands impacts.

- 11. EPA generally combines both permanent and temporary impacts when counting acreage for determining if a project is in the NEPA/404 Integration Process. What qualifies as "temporary impacts" has not been well defined.
- 12. In the case of the City's El Camino Real project, the total of temporary and permanent wetlands impacts is estimated as roughly 4 acres without river widening. If river widening is not incorporated, or if it could be accomplished with minimal wetlands impacts, the project would not be in the NEPA/404 Integration Process. However, all participants expressed the desire to continue to work together toward creating the best project possible and facilitating future permitting efforts, even if the project does not end up in the formal NEPA/404 Integration Process.
- 13. Wetland vegetation is underneath the bridge. A wider bridge could be considered to fragment the clapper rail habitat.
- 14. Potential mitigation sites must be identified now, and their impact on river hydraulics must be modeled.
- 15. The priority is to avoid wetlands impacts.
- 16. The Coastal Commission has many of the same concerns as the other agencies, including avoiding impacts to wetlands, and differentiating between permanent and temporary impacts of the project. The mitigation ratio they typically use for permanent impacts of the kind that would occur for the City's El Camino Real project is 4:1. There needs to be a demonstrated improvement in fish and wildlife habitat for a project component to be permissible.
- 17. For the Coastal Commission, widening the road (and bridge) to provide 4 travel lanes is increasing capacity, and this may not be an acceptable incidental public purpose when there are wetlands impacts. It was noted that currently, peak hour traffic is at Level of Service F. The offsets included in the project must be defined. A separate meeting will be needed with Coastal Commission to discuss their specific issues.
- 18. Caltrans noted that the project alternatives discussed in detail in the EIR/EA will have to satisfy the project purpose and need. Narrow footprint road cross-sections that would not improve traffic level of service or public safety would not satisfy the purpose and need.
- 19. The purpose and need was summarized in the June 17 letter.

- 20. The focus of FHWA is on the bridge. Lengthening the bridge by 100 feet to accommodate river widening adds roughly \$4 million to the project estimated construction cost.
- 21. The JPA and Lagoon project team members should be invited to the next meeting. Bruce McIntyre with PDC should be consulted for input on who should be invited.
- 22. MSCP staff from the City should be invited to the process. Clapper rail management directives will be needed for the project.

NOTE: These minutes are the preparer's understanding of the items discussed at the meeting. If discrepancies are noted, please contact the preparer within three days of receipt.

PREPARED BY:	Katherine Hon, P.E.
	Hon Consulting, Inc.
	619-294-8990 phone
	khon@honconsultinginc.com
DISTRIBUTION:	Attendees
DATE:	July 28, 2004

CITY OF SAN DIEGO EL CAMINO REAL ROAD/BRIDGE PROJECT AGENCY COORDINATION MEETING SUMMARY SEPTEMBER 7, 2004

ATTENDEES (in alphaberical order)					
NAME	AFFILIATION	PRESENT?	PHONE	E-MAIL	
Shawna	JPA	Yes	858-674-2275	shawna@sdrp.org	
Anderson			x13		
Norm Arndt	Rick Engineering	Yes	619-291-0707	ncarndt@rickengineering.com	
Eliana Barreiros	City of San Diego	Yes	619-446-5321	ebarreiros@sandiego.gov	
Edgar Camerino	Rick Engineering	Yes	619-291-0707	ecamerino@rickengineering.com	
Susan Carter	JPA	Yes	858-674-2275	susan@sdrp.org	
			x11		
Dr. Howard	Chang Consultants	Yes		changh@mail.sdsu.edu	
Chang					
Bryant Chesney	NMFS	absent		Bryant.chesney@noaa.gov	
Susan DeSaddi	Corps of Engineers	Yes	213-452-3412	Susan.a.desaddi@usace.army.mil	
John DiGregoria	USFWS	Yes	760-431-9440	John Digregoria@fws.gov	
Tim Dillingham	CDFG	Yes	858-467-4204	tdilling@dfg.ca.gov	
Stephanie Hall	Corps of Engineers	Yes	213-452-3410	shall@spl.usace.army.mil	
Bob Hoffman	NMFS	absent		Bob.hoffman@noaa.gov	
Katherine Hon	Hon Consulting	Yes	619-294-8990	khon@honconsultinginc.com	
Donna Jones	Sheppard, Mullin,	Yes	619-338-6500	djones@sheppardmullin.com	
	Richter &				
	Hampton,				
	Attorneys]]	
Chris Knopp	ProjectDesign	Yes	619-881-3390	chrisk@projectdesign.com	
	Consultants				
Dennis Landaal	Kimley-Horn	Yes	619-744-0110	Dennis.landaal@kimley-horn.com	
Richard Leja	City of San Diego	Yes	619-533-3764	rleja@sandiego.gov	
Ellen Lirley	Coastal	Yes	619-767-2370	elirley@coastal.ca.gov	
-	Commission				
Libby Lucas	CDFG	Yes	858-467-4230	elucas@dfg.ca.gov	
Chris Nordby	Tierra	Yes	858-578-9064	Tierraenv@aol.com	
	Environmental				
	Services			1	
Abi Palaseyed	City of San Diego	Yes	619-533-3756	apalaseyed@sandiego.gov	
Mike Porter	San Diego	Yes	858-467-2726	portm@rb9.swrcb.ca.gov	
	Regional Water				
	Quality Control				
	Board			1	
Nick Psyhogios	ProjectDesign	Yes	619-881-2549	nicholasp@projectdesign.com	
	Consultants				
Kai Ramer	Rick Engineering	Yes	619-291-0707	ker@rickeng.com	
Kerry Santoro	City of San Diego	Yes	619-533-3749	ksantoro@sandiego.gov	
Sherilyn Sarb	Coastal	absent	619-767-2370	ssarb@coastal.ca.gov	
	Commission				
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ATTENDEES (in alphabetical order)

NAME	AFFILIATION	PRESENT?	PHONE	E-MAIL
Steve Schroeter	Biologist,	Yes	760-438-5953	schroete@lifesci.ucsb.edu
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Tamara Spear	CDFG	Yes	858-467-4223	tspear@dfg.ca.gov
Samir Tanious	Southern	absent		Samir.Tanious@sce.com
	California Edison	}	}	
Mark Weis	City of San Diego	absent	619-533-3791	mweis@sandiego.gov
CALTRANS		+		
Bruce April		Yes	858-616-6614	Bruce.april@dot.ca.gov
Gladys Baird		Yes	858-616-6632	Gladys.t.baird@dot.ca.gov
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Sue Scatolini		Yes	858-616-6640	Susan.scatolini@dot.ca.gov
Tony Tomera		absent	858-616-6531	Anthony Tomera@dot.ca.gov
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VIA				<u> </u>
TELECON-				
FERENCE			}	
Elizabeth	EPA	Yes		Goldmann.elizabeth@epa.gov
Goldmann				
Liz Varnhagen	EPA	Yes		Varnhagen.liz@epa.gov
Larry Vinzant	FHWA	Yes		Larry.vinzant@fhwa.dot.gov

DISCUSSION SUMMARY

- 1. Based on recent hydraulic analyses, the City finds that the river would not need to be widened substantially upstream and downstream and the bridge would not need to be lengthened 100 feet in order to achieve no net rise in 100-year water surface elevations upstream. The river widening as has been proposed is now not considered necessary to meet the project purpose and need. However, the City does not want to remove a prominent feature from the alternatives studied in detail in the EIR without consulting with the agencies.
- 2. Dr. Chang presented highlights from his hydrologic study, which focused on potential effects of the four river widening concepts on the downstream San Dieguito Lagoon Wetlands Restoration Project ("Edison/JPA project" herein), in response to questions from the agencies at the July 14, 2004 meeting. All agency contacts received an electronic copy of this brief report. The handout provided at the meeting presented two of the color graphics from the presentation, a diagram of the proposed Edison/JPA project, and an aerial photo of flooding in 1980 (35-year flood) from the beach east to El Camino Real. Dr. Chang's presentation included the following points:
 - The existing roadway is subject to overtopping in the 100-year flood.
 - Hydraulics in the river system are controlled by downstream conditions; therefore, changes in the floodplain at El Camino Real would only affect flood

levels upstream. Flood levels on the Edison/JPA project, which is downstream, would not be affected by El Camino Real.

- Effects of river widening on groundwater would likely not be significant because the widening would increase groundwater recharge area within the widened channel during low flow, but decrease groundwater recharge area upstream during low flow, and decrease groundwater recharge from inundated areas during relatively brief flood conditions.
- River widening would represent a removal of sediment from the watershed, so in the long term, there could be less beach sand supply resulting from river widening. This would not impact the JPA project because of the design of that project, but potentially could have an impact long-term on beach supply and/or foundation scour of downstream bridges/roads.
- River widening would increase sediment deposition in the widened area during low flow because velocity would be less. This could be adverse for wetlands created in the river. Also, downstream flows would contain less sediment, and scour potential in the downstream river channel could increase.
- The tidal basins that would be created by the Edison/JPA project would be protected from changes in the river conditions by berms.
- Certain changes to the bridge abutments under the proposed new bridge would be needed to avoid a net rise in upstream 100-year water surface elevations, but the extensive river widening and lengthening of the bridge would not be needed. These limited changes will be defined and analyzed in the EIR.
- 3. The clapper rails at and adjacent to the existing El Camino Real bridge are a major issue. The wetted area upstream of the bridge could decrease with a substantially widened river. CDFG is very concerned that the existing habitat, which is successfully supporting a dense population of the federal- and state-endangered bird, could diminish over time if conditions were drier in the river bed. Upstream conditions with the project implemented must be addressed thoroughly in the EIR. Clapper rail habitat that is impacted must be replaced per MSCP guidelines with clapper rail habitat, and not other habitat types.
- 4. Because the potential wetlands impacts from river widening were estimated very conservatively, USFWS and Caltrans believe total impacts to wetlands would be less than 5 acres even with river widening, and the project will not fall under the formal NEPA/404 Integration Process. In any event, the conclusion to not consider river widening/bridge lengthening as a variation on the alternatives means there will be no formal NEPA/404 Integration Process. However, the City will continue to have periodic joint agency coordination meetings, and will meet about specific issues with various agencies as the environmental process continues.
- 5. The extent, depth, and quality of groundwater are important factors in successfully creating wetlands. Groundwater infiltrates into the river bed and into the ponds on the golf course south of the river. Groundwater total dissolved solids (TDS) content is roughly 17,000 mg/l, or brackish water. Brackish marsh would be the most likely wetlands type to develop naturally and be sustainable.

- 6. Potential mitigation site locations for El Camino Real include 1) the Boudreau property south of the river and west of El Camino Real, which was recently purchased by the JPA; 2) City-owned Polo Fields north of the river and east of El Camino Real; 3) a privately-owned (Hu Family Trust) vacant property south of Via de la Valle and east of El Camino Real, which currently is mapped with substantial acreage of salt marsh although it is often used as a parking lot; and 4) approximately 16 acres controlled by Southern California Edison west of Horsepark's western boundary and north of the river.
- 7. The agencies agreed the private parcel adjacent to Via de la Valle is too far north of the river for creation of a beneficial clapper rail habitat. An off-river location such as the Polo Field, set apart from the river by berms, may require connection to the river via culverts set high enough to avoid collecting sediment, unless groundwater can sustain the wetlands. Silts and clays can significantly harm wetlands, and this would be an issue for in-river mitigation.
- 8. The JPA would prefer that mitigation planning for El Camino Real focus on either the former Boudreau property, as their goal is to develop habitat restoration in this area, or on the 16-acre site for which Southern Edison developed a mitigation plan, but which it does not need to create. The JPA is open to including the types of wetlands needed for El Camino Real mitigation in the draft restoration plan developed for the former Boudreau property, which currently emphasizes a non-tidal design.
- 9. Alternative D, which is further to the east than the other alternatives, would allow the bridge and road north of the bridge to be constructed without phasing. This would avoid the need to build a two-lane bridge and road to one side of existing El Camino Real, then shift traffic to the new segment, demolish the existing bridge, and build the other half, a process that would be required for all of the other alignment alternatives. The eastern alignment alternative could be built in roughly half the time of the phased alternatives, and would create substantially less temporal impacts in the river during construction. This would help with impact avoidance and minimization, which are important to the CDFG and others. It is possible that single columns rather than pairs of columns could be appropriate for the eastern alignment bridge, which would cause less temporary and permanent impacts in the river than the other alignments. For the eastern alignment alternative, the old bridge would be demolished, but the timing would be more flexible because there would not be any traffic on it once the new facility is completed. The agencies requested that details on the timing and duration of construction for each alignment alternative be provided in the EIR. CDFG wants construction work in the river done outside the breeding/nesting season of March - mid-August.
- 10. JPA wants to see the EIR address cumulative effects, including the I-5 widening and other projects mentioned during the discussion.
- 11. At the end of the meeting, all agencies concurred that the substantial river widening and bridge lengthening concept could be addressed in the EIR as a concept that was considered but rejected, and not included as a feature of the road/bridge alignment alternatives addressed in detail. Agency comments are highlighted as follows.

- USFWS: Even if the choice were made to create wetlands in the river, the mitigation could be accomplished without widening the river under the new bridge, and requiring a substantially longer bridge. The EIR must document how the not substantially lengthened bridge would avoid increasing flow rate and velocity downstream of the bridge, since more flow in the 100-year event would be forced under the bridge due to the road embankments north of the bridge. Mitigation location(s) and concepts are the next issue to address, as well as potential impacts to the clapper rail. Wants to explore widening the river in areas outside of the bridge location to create mitigation.
- CDFG: The document does not need to address river widening as a variation of alternatives analyzed in detail in the EIR. Any upstream changes that could affect the clapper rail would be of concern. Mitigation development must focus on creating habitat that is of the type and in a location that would be beneficial to the clapper rail. Locations that are distant from the river would not be desirable to CDFG for effective clapper rail habitat mitigation. Salt marsh must be mitigated with salt marsh.
- FHWA: Putting public money to the best use is an important consideration. Could the money needed to create the wider river and longer bridge be applied more effectively elsewhere or saved?
- Corps of Engineers: Substantially lengthening the bridge is not an essential project feature.
- Coastal Commission: The current direction of minimizing wetlands impacts by not widening the river and lengthening the bridge substantially is acceptable. Discussions between the City and the Coastal Commission regarding increasing the road capacity to four lanes are ongoing, because Coastal Commission is concerned about widening the bridge/roadway when wetlands are impacted.
- San Diego Regional Water Quality Control Board: The current direction of the group is acceptable. The eastern alignment alternative that would allow the bridge to be built all at once and not phased in two construction stages would reduce temporal impacts of construction in the river, which is a favorable aspect of that alternative.
- City of San Diego Environmental: For CEQA, the alternatives are driven by what is needed to meet the project purpose and need. Because the substantial river widening variations would not be needed to accomplish the project, and because they complicate the EIR, the City would prefer to not include substantial river widening and bridge lengthening as part of the detailed alternatives.

JPA: The JPA would prefer to not have substantial river widening included in the alternatives for El Camino Real because of uncertainties in long-term beach sand supply, which was an extremely sensitive issue for the San Dieguito Lagoon Wetland Restoration Project. Cumulative impacts on the river system, particularly on the overall health and function of the river, should be addressed in the EIR.

NOTE: These minutes are the preparer's understanding of the items discussed at the meeting. If discrepancies are noted, please contact the preparer within five working days of receipt.

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Sent:	Monday, November 15, 2004 8:40 AM
Attach:	El Camino Meeting Notes Mitigation 10-28-04.DOC; ElCaminoRestSites.pdf

Subject: El Camino Real Initial Mitigation Site Planning

Hello Permitting Agencies and Interested Parties - Based on guidance from the Permitting Agencies at the September 7, 2004 El Camino Real Multi-Agency Coordination Meeting, the project team has been evaluating potential mitigation sites for wetlands creation. The attached Word file summarizes the results of two planning meetings, at which a City and consultant team developed mitigation planning guidelines, identified six feasible sites, agreed upon seven key site evaluation criteria, selected a site evaluation methodology, and conducted the evaluation on the six sites. The two tables at the end of the meeting summary present the evaluation "scoring" process and the results. The attached pdf file is a map illustrating the location of the six sites evaluated.

Based on this process, which by this e-mail we are presenting to the Permitting Agencies for comment, the former Boudreau site (now owned by the JPA- Site #2)) is ranked highest (most preferable for mitigation), the Southem California Edison parcel (Site #4) is ranked second, and the Polo Club fields (Site #1) and a City-owned property (Site (#3) are tied at third.

In view of everyone's busy schedule, the project mitigation planning team is sending this e-mail for review and comment by the permitting agencies (and interested parties). We would be pleased to arrange a Multi-Agency coordination meeting to discuss this very important issue, if requested. Please route any comments, questions, or requests to me. We are particularly interested in the opinions of the permitting agencies on our site planning process and results. It is crucial to the progress of El Camino Real that we hear from each of our permitting agencies no later than November 30. Please reply with your concurrence, questions, or concerns as soon as reasonably possible.

Thank you for your attention to this matter, which is crucial for progress on the El Camino Real project.

Best regards,

Katherine

Katherine Hon, P.E. Hon Consulting Inc. 619-294-8990 phone 619-269-5515 fax

CITY OF SAN DIEGO EL CAMINO REAL ROAD/BRIDGE PROJECT MITIGATION PLANNING MEETING #2 SUMMARY OCTOBER 28, 2004

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DISCUSSION SUMMARY

The purpose of the meeting was to reach consensus within the project team on the mitigation sites and evaluation process, and to use the selected process to rank the feasible mitigation sites. Results of the meeting are summarized below.

1. MITIGATION GUIDELINES

- a. The group agreed on the following guidelines for our mitigation planning.
 - The focus of mitigation is on wetlands creation.
 - The habitat type is brackish/salt marsh primarily to benefit clapper rail.
 - It is preferable to accomplish all needed wetlands mitigation on one site.
 - It is preferable to accomplish all needed wetlands mitigation in the Coastal Zone.

2. IDENTIFICATION OF FEASIBLE SITES

At Mitigation Planning Meeting #1 on October 7, 2004, the group developed the following Site Identification Criteria as essential characteristics of any site considered for mitigation:

- The site is within City of San Diego city boundaries.
- The site is within the *lower* San Dieguito River watershed.
- It would be feasible to create brackish marsh on the site.
- For mitigating impacts that occur in the San Dieguito River, it would be feasible to create habitat for the clapper rail on the site.
- The site does not currently have a use that would prohibit developing biological resources mitigation on it.
- The site would not require continual maintenance that would affect wetlands.
- The site is available to be considered for use as biological resources mitigation.
- For mitigating impacts that are within the Coastal Zone (west of the eastern edge of El Camino Real right-of way), the site is within the Coastal Zone.

At Mitigation Planning Meeting #1 on October 7, 2004, the group identified six feasible sites for wetlands mitigation to be evaluated. The group confirmed today there are no additional feasible sites. The San Pasqual Valley is not considered feasible because brackish marsh could not be created there. For this reason, the group modified the second Site Identification Criterion to be the *lower* San Dieguito River watershed.

The group verified the following sites will be evaluated:

- 1. Polo Club fields (north of river, east of El Camino Real)
- 2. Former Boudreau property, now owned by San Dieguito River Park JPA (about 70 acres south of river, west of El Camino Real)
- 3. City's San Dieguito Lagoon Mitigation Area (about 16 acres south of river, west of El Camino Real, fewer than 2 acres used by MWWD for mitigation)
- 4. SCE Property in San Dieguito Lagoon Wetland Restoration Project area (about 20 acres north of river, west of El Camino Real)
- 5. Hu Property (about 15 acres north of river, east of El Camino Real
- 6. City's Eastern Polo Club area (about 30 acres north of river, east of El Camino Real)

Regarding Site #2, Katherine noted that informal communication with the JPA indicates they intend to "market" the land for restoration mitigation only. The land cannot be sold as mitigation because it has already been purchased for open space preservation using a grant. However, the grant money did not include the cost to restore the property. It is likely that the JPA would actually do the mitigation if the participating agency would prefer that.

Regarding Site #3, Madison noted it does not appear that MWWD has specific ownership. He will verify that the property is under general City ownership. Norm noted the Lagoon Wetlands Restoration Plan would bring a branch of the river close to this area.

Regarding Site #4, Chris noted that Southern California Edison has verified this site is available for another entity to pay to implement the restoration plan. SCE would not do the restoration unless they have funding from another entity, as they do not need this acreage to accomplish their mitigation requirements.

3. SITE EVALUATION CRITERIA

- a. The group agreed with the following guidelines:
 - If we can't measure the criterion, it isn't useful.
 - If the criterion doesn't differentiate the sites, it isn't useful.
- b. Of the preliminary evaluation criteria the group identified at Mitigation Planning Meeting #1, the group agreed some should be deleted and some new ones should be added, as follows:
 - Ownership (retain)
 - Cost (delete; difficult to measure at this time due to federal limitations on negotiations)
 - Impacts on existing infrastructure (delete; does not differentiate)
 - Impacts on existing biological resources (retain)
 - Impacts on other projects (add: "plans, or existing uses")
 - Ability to connect to the San Dieguito River (retain)
 - Ability to enhance existing biological resources for mitigation credit (delete; not meaningful since focus is on wetlands creation)
 - Suitable zoning (delete; does not differentiate)
 - Designated for restoration (new)
 - Proximity of site to project impacts to clapper rail (new)
 - Location of site in relation to Coastal Zone (new)

4. SITE EVALUATION METHODOLOGY

- a. The group agreed to develop an objective evaluation methodology rather than a comparative methodology (meaning we will have an absolute "performance scoring" process, rather than compare the sites to each other).
- b. The group agreed to assign points for characteristics/criteria in accordance with a simple 1-2-3 scale, with the high score being most favorable.

The definitions developed for performance scoring of the selected evaluation criteria are listed in Table 1. The results of the site evaluation with the process are in Table 2.

With this process, the JPA (former Boudreau) site is ranked highest, the SCE site is second, and the Polo Field and City Lagoon site are tied at third. We propose to investigate the feasibility of an arrangement with the JPA, with the SCE site as an alternative.

5. NEXT STEPS AND ACTION ITEMS

The group decided the next steps should be as follows:

- 1. Provide a summary of the mitigation planning to the agencies, and ask if they want to meet, or if they concur based on their review of the summary. *Action: Katherine Hon*
- 2. Request a meeting with the JPA to discuss the feasibility of a mitigation agreement. *Action: Abi Palaseyed*
- 3. Investigate the City's ownership of Site #3. Action: Real Estate Assets

NOTE: These minutes are the preparer's understanding of the items discussed at the meeting. If discrepancies are noted, please contact the preparer within five working days of receipt.

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DATE:	October 29, 2004
DISTRIBUTION	Permitting Agencies and Interested Parties
DATE:	November 15, 2004

TABLE 1 PERFORMANCE SCORING DEFINITIONS

Ownership

- 3 = Owned by City of San Diego
- 2 =Owned by a cooperative entity
- 1 = Other ownership

Impacts on Existing Biological Resources

- 3 = No impacts on sensitive biological resources
- 2 = Minimal impacts on existing biological resources
- 1 = Implementing mitigation would add to project wetlands impacts

Impacts on Other Projects/Plans/Existing Uses

- 3 = No impacts
- 2 = Mitigable impacts
- 1 = Would substantially interfere with other projects, plans, or uses of the site

Ability to Connect to the San Dieguito River

- 3 = Easily connected without changing river hydraulics
- 2 = Feasible to connect to San Dieguito River
- 1 = Difficult to connect to San Dieguito River, or could change river hydraulics

Designated for Restoration

- 3 = Site is already designated for wetlands restoration/creation
- 2 = Site is available for designation as a restoration area
- 1 = Site is not likely to be designated for restoration

Proximity of Site to Project Impacts to Clapper Rail

- 3 = Site is adjacent to clapper rail impact area
- 2 = Site is within $\frac{1}{2}$ mile from clapper rail impact area
- 1 = Site is more than $\frac{1}{2}$ mile from clapper rail impact area

Location of Site in Relation to Coastal Zone

- 3 = Site is entirely within the Coastal Zone
- 2 = Site is partially within the Coastal Zone
- 1 = Site is not within the Coastal Zone

TABLE 2 MITIGATION SITE EVALUATION PROCESS RESULTS

SITE	1 City's Polo Field	2 JPA (former Boudreau)	3 City's Lagoon Site	4 SCE Lagoon Site	5 Hu Parcel	6 City's Eastern Polo Field
CRITERIA						
Ownership	3	2	3	2	1	3
Biological Impacts	3	3	3	3	1	3
Project/Plan/Use Impacts	1	3	1	3	1	2
Ability to Connect to River	3	3	2	3	1	3
Restoration Designation	1	3	2	3	1	1
Proximity to Clapper Rail Impact Area	3	3	1	1	2	1
Location in Coastal Zone	1	3	3	3	1	1
TOTAL SCORE	15	20	15	18	8	14
RANKING OF SCORE	3 rd (tie)	1 st	3 rd (tie)	2 nd	5 th	4 th

.



CITY OF SAN DIEGO EL CAMINO REAL ROAD/BRIDGE PROJECT AGENCY COORDINATION MEETING SUMMARY FEBRUARY 28, 2005

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DISCUSSION SUMMARY

- 1. The objectives of the meeting were to obtain input and subsequent written concurrence from the permitting agencies on the following: proposed mitigation ratios, and the preferred mitigation site.
- 2. Detailed impacts on sensitive biological resources based on planning level GIS estimates were provided in the background information e-mailed February 24, 2005. A summary of wetland impacts handed out at the meeting is included in these notes as Table 1. Acreage differences among alternatives in terms of impacts in the river relate to assumptions about construction easements, and the planning level of the mapping. There will be more accuracy in the impact areas when detailed final design is prepared. However, the impact to disturbed coastal brackish marsh in the river is similar for the three alternatives presented: more than 0.5 acre and less than 1 acre.

TABLE 1 CITY OF SAN DIEGO EL CAMINO REAL ROAD/BRIDGE PROJECT WETLANDS IMPACT/MITIGATION SUMMARY (acres)

	Central Alignment & Lower Elevation		Western Alignment		Eastern Alignment	
Vegetation Type	Impacts	Proposed Mitigation	Impacts	Proposed Mitigation	Impacts	Proposed Mitigation
Riparian Scrub	0.66	1.98	0.53	1.59	0.86	2.58
DCBM with Clapper Rail	0.86	3.44	0.63	2.52	0.77	3.08
DCBM without Clapper Rail	2.19	8.76	1.81	7.24	2.19	8.76
Salt Marsh	0.65	2.6	0.39	1.56	0.75	3.0
TOTAL	4.36	16.78	3.36	12.91	4.57	17.42

DCBM = Disturbed Coastal Brackish Marsh

3. Proposed mitigation ratios were discussed in the background information, summarized in the meeting agenda, and are repeated below.

Riparian Scrub – 3:1 overall 1:1 on-site restoration/off-site creation

2:1 enhancement

Coastal Wetlands - 4:1 overall

- 4:1 creation for clapper rail habitat
- 1:1 creation plus 3:1 enhancement for non-clapper rail habitat

Coastal Sage Scrub 1:1 contribution to City's Habitat Acquisition Fund

These ratios were developed by the Project Biologist (Chris Nordby with Tierra Environmental Services) as a synthesis of the CDFG and other agency guidance (1:1 for no net loss) and the City's Environmentally Sensitive Lands guidance (4:1 for coastal wetlands).

- 4. The agencies agreed no-net-loss is typically required, and the proposed 1:1 creation (or restoration where appropriate) meets this requirement. The Corps stated the proposed ratios are adequate. USFWS noted they will defer to the Corps on the issue of mitigation ratios. The Regional Board noted the 1:1 ratio is acceptable, and the 4:1 ratio is more than adequate for Regional Board's needs. CDFG stated that the 1600 representative, who was not in attendance, would have to review the proposed ratios. The attending CDFG representative said CDFG typically requires no net loss (or 1:1), and the proposed 4:1 ratio is higher than they typically see. However, the presence of clapper rail in the river is a special circumstance that must be considered.
- 5. USFWS stated that due to the temporal nature of the impacts, "temporary" impacts should be considered permanent and mitigated as such.
- 6. The required timing for accomplishment of mitigation was discussed. NOAA noted that mitigation needs to be accomplished before construction occurs. The mitigation must be functionally equivalent to what is lost. Caltrans and the City noted the proposed ratios incorporate an assumption that mitigation would be installed concurrently with the construction project, and having the wetlands creation in place a year before the proposed construction start time of September 2007 is not possible. The mitigation must be included in the environmental and permitting processes for entire project. The earliest the CEQA/NEPA process can be expected to be completed is the beginning of 2006, and permits would probably require another 6 months after that. CDFG noted ratios can decrease if mitigation is in place before the actual disturbance.
- 7. Construction timing and duration were discussed. A handout presenting construction activities and timing for two basic types of bridges is included in these meeting notes as Table 2. The single-stage bridge applies to the Eastern Alignment only, which is separated from the existing bridge and road to the north. All other alignment alternatives would require a multiple-stage bridge as only half could be built at a time.
- 8. As Table 2 indicates, no construction in the river is proposed during the breeding season. USFWS noted then there shouldn't be take of clapper rail, but there will be a temporary loss of habitat. Biological monitoring will be required during construction.
- 9. The City's preferred mitigation site is the former Boudreau site (tomato fields west of El Camino Real), now owned by the San Dieguito River Park JPA. The JPA noted they support the City's proposal to implement mitigation on this site. The City would not have to pay for the use of the land, but the JPA would have to be reimbursed for maintenance. The City's El Camino Real project would have to include CEQA/NEPA clearance for the mitigation on the site, and would have to obtain the needed permits.

TABLE 2 CITY OF SAN DIEGO EL CAMINO REAL ROAD/BRIDGE PROJECT CONSTRUCTION DURATION SUMMARY

Construction/Breeding Season	Single-Stage Bridge Construction Activity	Multiple-Stage Bridge Construction Activity
	(Eastern Alignment only)	(All other alternatives)
Construction Period #1	Construct bridge	Construct substructure and
Sept. 2007-Feb. 2008	substructure (piles & columns)	falsework for half of bridge
Breeding Season #1 Feb. 2008-Sept. 2008	No Construction	Construct Via de la Valle and half of El Camino Real where possible
Construction Period #2 Sept. 2008-Feb. 2009	Construct bridge superstructure (falsework, soffit, deck)	Complete superstructure and surface for half of bridge, complete half of El Camino Real; transition traffic, demolish existing bridge
Breeding Season #2 Feb. 2009-Sept. 2009	Construct along Via de la Valle	No Construction
Construction Period #3 Sept. 2009-Feb. 2010	Install bridge surface features (sidewalk, barrier, handrail); construct El Camino Real; transition traffic; demolish existing bridge at any acceptable time in the future	Construct substructure and falsework for other half of bridge
Breeding Season #3 Feb. 2010-Sept. 2010		Begin construction of other half of El Camino Real where possible
Construction Period #4 Sept. 2010-Feb. 2011		Complete superstructure and surface for other half of bridge, complete other half of El Camino Real; transition traffic
TOTAL CONSTRUCTION DURATION	~2.5 years	~3.5 years
BREEDING SEASONS SPANNED	Two	Three

- 10. Dr. Chang noted that a hydraulic connection to the river to feed the wetlands created on JPA's "Boudreau" site would have to be very carefully designed, but it would be possible to accomplish the connection without having an adverse effect on river flow and sediment flow.
- 11. The agencies agreed the JPA "Boudreau" site is a suitable location for mitigation.
- 12. CDFG noted they would prefer mitigation be accomplished on the Polo Club fields, as this location, being east of the bridge, is closer to the currently occupied clapper rail habitat in the river. Also, CDFG research indicates the area of the Polo Club fields was supposed to be restored in the past, and the JPA's "Boudreau" site is already committed to eventual restoration.
- 13. The City noted that the current lease with the Polo Club expires in 2012, and removing up to 16 acres for mitigation related to the El Camino Real Bridge project could generate the need to compensate the lessee or replace the lost acreage for the Polo Club perhaps by acquiring the Hu property to the north, filling that land and amending the lease to include the replacement area. The City's environmental consultant emphasized including such a proposal in the EIR/EA would substantially increase the wetlands impacts to salt marsh, and drive the environmental process into NEPA/404. The project biologist noted clapper rail are under the bridge, and probably originally came from downstream, so the birds could move west to the JPA "Boudreau" site.
- 14. FHWA suggested a matrix be prepared to compare the two mitigation sites, and this information distributed via e-mail to see if a consensus can be reached. The City and CDFG should investigate previous Streambed Alteration Agreements to determine if all commitments have been met.
- 15. A comparison summary will be prepared, and a meeting date will be arranged for the end of March. If consensus is reached on the mitigation site, the next topic for agreement will be the preferred alignment.

NOTE: These minutes are the preparer's understanding of the items discussed at the meeting. If discrepancies are noted, please contact the preparer within five working days of receipt.

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Attendees and Interested Parties
March 16, 2005

CITY OF SAN DIEGO EL CAMINO REAL ROAD/BRIDGE PROJECT AGENCY COORDINATION MEETING SUMMARY APRIL 4, 2005

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DISCUSSION SUMMARY

- 1. The objective of the meeting was to follow up on questions and concerns communicated by the permitting agencies on the City's preferred mitigation site, which is the former Boudreau site purchased by the JPA (herein referred to as the "JPA site").
- 2. Clarifications to the February 28, 2005 agency coordination meeting notes and additional comments were received from CDFG and the USFWS, as summarized below.

Libby Lucas with CDFG stated in a March 2, 2005 e-mail that CDFG generally agrees with the proposed mitigation ratios. However, she requested clarification on the definition of "restoration," stating that for CDFG "to consider whether restoration alone or a restoration/creation mix would meet the no-net loss requirement, we would need to know the details of the proposal." She also noted that if the term "coastal wetlands" includes the clapper rail habitat to the east of the bridge, "the proposed 4:1 creation for the loss of clapper rail habitat will be acceptable to DFG, as will be the 1:1 creation plus 3:1 enhancement (i.e., removal for non-native invasive species from the riparian area)."

In a subsequent letter to the City e-mailed on March 24, 2005, CDFG made the following additional comment on the February 28, 2005 meeting notes: "The minutes correctly reflect that CDFG indicated that the proposed 4:1 mitigation is higher that we usually see for the loss of coastal wetlands. What I meant to say is that 4:1 <u>creation</u> is higher than we usually see. City of San Diego requires 4:1 for coastal wetlands, but does not specify that it all be creation. As we have said in a previous e-mail, we agree with the 4:1 creation for the loss of habitat that supports the clapper rail." This letter also posed additional questions regarding the Polo Club fields as a mitigation site. These questions were the focus of the April 4, 2005 meeting.

John DiGregoria with USFWS stated the following in a March 23, 2005 e-mail: "A couple of notes from your minutes. The Service stated that there will likely be no direct injury or kill from construction equipment. However, the permanent removal of occupied habitat will constitute "take" from harm (loss of occupied habitat) and we will need to go through formal consultation with the project. The Service also supports the CDFG position regarding the Polo Fields and any outstanding issues regarding the Polo Fields needs to be closed before we move forward with this project."

- 3. The feasibility of the alternative alignments that affect the western edge of the Polo Club Fields leasehold was discussed. The alternatives for the road are feasible because the lease specifically allows the City to build a road and to have other utility easements over and across the property. However, taking land for mitigation is not specifically allowed in the lease, so this action would have to be negotiated separately. The lease is for 26 years. It started in 1986 and runs to the end of 2012. The lease does not include language regarding implementing mitigation on the property referenced in the 1981 Fairbanks Country Club EIR prepared for Watt Industries, the property owner at the time. A Corporation Grant Deed transferred the property to the City on October 24, 1983. The City noted that mitigation never being implemented on the Polo Club fields for the 1981 project is a code enforcement issue, and the City will investigate this issue. It was agreed by CDFG that mitigation for El Camino Real and mitigation for the 1981 Fairbanks Country Club project are two different issues. CDFG also concurred that if the road is in the lease, then the road alignments affecting the property are feasible.
- 4. Potential actions by Polo Club if part of the property were taken for the road and for mitigation were discussed. Caltrans emphasized that it is speculation to predict any actions on the lessee's part, and the environmental document will not speculate. City Real Estate Assets stated that with only 7 years left on the lease, it is not likely that the lessee would go to the expense of obtaining the private property to the north in order to continue operations.
- 5. Demolition of the existing bridge was discussed. CDFG suggested leaving the pier walls of the existing bridge in place if the Eastern Alignment Alternative, with the completely separate new bridge, is selected. The hydraulic effects of the existing bridge and other components of the river system in this location, including the rip rap blanket and existing bridge abutments, must be analyzed. USFWS noted the rip rap blanket has helped establish the emergent marsh, which is attractive to the clapper rail. The hydraulic

analysis must determine if steepening the abutments as proposed would be detrimental to the hydraulic system that supports the clapper rail. The project description must include how and when the existing bridge would be demolished. CDFG noted that we must balance river functionality with the clapper rail requirements.

6. The biological suitability of the JPA site and the Polo Club site for clapper rail mitigation was discussed. The project biologist read the following from a government annotated bibliography about clapper rail written by Dick Zembal, former USFWS expert:

"The light-footed clapper rail is non-migratory. Once established on a territory, the birds stay throughout the year and from year to year.

Local wandering, however, has been documented, with sightings of rails in winter, sometimes far inland. Whittier Narrows, 32 km from the coast, and Walnut Canyon Reservoir (Nohl Ranch Lake), 23 km from the coast, are the farthest inland sites documented thus far. The most probable explanation for winter dispersal is that young birds must seek their own territories, once the family unit breaks up at the end of breeding season."

- 7. Coastal Commission policy regarding mitigation for impacts in the Coastal Zone was discussed. The City's Local Coastal Program requires impacts in the Coastal Zone to be mitigated in the Coastal Zone. However, the Coastal Commission noted that state coastal requirements would be the review standard in the project area, not the City's Local Coastal Program. The Coastal Commission said that if there is biological benefit to mitigating outside of the Coastal Zone, they would consider such a plan.
- 8. Potential impacts to the JPA trail that is currently on the north bank of the river were discussed. If mitigation were on the Polo Club site, allowance for at least a 100-foot buffer would have to be made in addition to the width of the mitigation area. JPA noted moving the trail as far north as the property line between the private property and the Polo Club field property could be a problem for their Coast to Crest trail alignment. However, they do not have a set trail alignment east of the bridge, because they must still address how to go through the Morgan Run area.
- 9. Potential legal issues associated with implementing mitigation on the Polo Club site were discussed. Caltrans noted that they generally cannot condemn for mitigation land, and they must prove necessity. In this case, since the JPA site is also considered feasible, it would be difficult to prove necessity for using the Polo Club site.
- 10. USFWS and CDFG concluded that neither agency has the authority to require the City to select a particular mitigation site if several are adequate. If it can be demonstrated that emergent marsh can be established on the JPA site, then that site is acceptable for mitigation for El Camino Real Road/Bridge Project. Hydrologic feasibility is related to the depth of groundwater on the site, and the ability to connect to the river without affecting river hydraulics.

11. The City will pursue having borings drilled on the JPA site to determine the existing groundwater level. The City will have Dr. Chang develop and analyze a river connection. The City will also have Dr. Chang evaluate the hydraulic conditions that would occur if the existing bridge were left in place and a new bridge built to the east. Results of the feasibility and hydraulics analysis will be reported in future e-mail correspondence.

NOTE: These minutes are the preparer's understanding of the items discussed at the meeting. If discrepancies are noted, please contact the preparer within five working days of receipt.

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CITY OF SAN DIEGO EL CAMINO REAL ROAD/BRIDGE PROJECT AGENCY COORDINATION MEETING SUMMARY OCTOBER 25, 2005

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The purpose of the meeting was to show available locations for wetlands creation and enhancement, and present the basic concepts of the wetlands mitigation plan for the project on the JPA (former Boudreau) property. The acreages of impact and mitigation needs presented reflect those of the Eastern Alignment, which is the City's Preferred

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Alternative. The mitigation acreages proposed are a conservative estimate that would cover any of the alternatives.

The meeting discussion is summarized below.

DISCUSSION SUMMARY

- 1. **Preferred Mitigation Site**. The JPA (former Boudreau) property lies west of El Camino Real in the Coastal Zone. This property was selected by the City as the preferred mitigation site after a multiple-site, group-process evaluation, as discussed with the agencies in meetings on February 28, 2005 and April 4, 2005.
- 2. Utility Corridor. The JPA property is split diagonally by a 150-foot wide utility corridor running southeast to northwest between El Camino Real and Via de la Valle. The utility corridor is controlled by SDG&E. High voltage steel transmission towers are in the utility corridor above ground, and three pipelines are in the utility corridor below ground. The pipelines carry fuel and high-pressure gas. The pipelines are at shallow depths (top of pipes at 4 to 9.5 feet below the ground). Therefore, culverts cannot be buried in the utility corridor to hydraulically connect the east and west sides of the JPA property. After developing concepts for each side and analyzing these hydraulically, the City has selected the east side of the utility corridor for the mitigation plan. This will place the created brackish marsh as close as possible to the clapper rails east of El Camino Real.
- 3. **Topography and Groundwater Levels.** Based on borings drilled on the JPA site by Ninyo & Moore on June 13, 2005, the groundwater levels east of the utility corridor vary from approximately 3 to 6 feet below the existing ground surface. Based on topographic mapping, the existing agricultural fields are at elevations of 12 to 14 feet above mean sea level (msl). Therefore, the groundwater table is at an elevation of about 8 feet msl. The river bed elevation is about 3 to 5 feet msl. High tide up the San Dieguito River is at a maximum elevation of approximately 4 feet msl. Tidal influence on the mitigation site is not likely.
- 4. **Flooding Issues**. The JPA property is in the 100-year floodplain of the San Dieguito River. The 100-year flood elevation in this area is approximately 19 feet msl, or 5 to 7 feet above the existing ground surface of the agricultural fields. Based on historic flooding patterns of the San Dieguito River along the JPA site, if brackish marsh is planted in an area that is lowered about 3 to 6 feet to be close enough to groundwater to be sustainable, the area will be subject to damage from high floods. In greater than about the 10- to 15-year flood, high-velocity water carrying sediment would overtop the river banks and pour into the lowered wetlands area. The sediment would deposit in the depression, and erosion would occur from the fast flowing water.

- 5. **Protective Vegetated Berm.** In order to protect the planted wetlands from flood and sediment damage, a vegetated berm is proposed to be constructed parallel to the river along the edge of the area lowered to create brackish marsh. The berm would have a side slope of 2.5:1 on the river side and would rise 10 feet above the existing ground surface to provide 100-year flood protection of the created wetlands. The vegetated berm would be set back from the south bank of the river along the effective flow line, but would be within the 100-year floodplain. Without the berm, the lowered mitigation area would capture sediment during high flows, which would bury the planted brackish marsh and reduce sand supply to the beach downstream. JPA noted this is why the San Dieguito Lagoon Wetlands Restoration Project also has berms along the river. Their project was in litigation for 2 years over the beach sand supply issue.
- 6. **Inflow Weir.** A weir (lowered notch) about 250 feet long would be constructed in the eastern edge of the berm to divert a portion of high river flows into the created brackish marsh. The weir would be protected by open stabilization material such as Armorflex, which would be planted with site-appropriate vegetation. Water flowing over the weir would enter the created wetlands in a controlled fashion that would prevent erosion and sedimentation. Some of the high river flows must be allowed into the created wetlands so that upstream 100year water surface elevations would not be increased by the vegetated berm in the floodplain.
- 7. Low Flow Culverts. Pipes would be installed through the protective vegetated berm to allow low river flows to enter the created brackish marsh. The culverts would allow flow exchanges between the river and the created brackish marsh. The bottom of the culverts would be set at an elevation of 6 feet msl, (slightly above the river bottom to prevent sediment from entering the created brackish marsh) and would allow slowly moving water to enter the area. Slowly moving water is desirable for the clapper rail.
- 8. Outflow Weir. During high flow events, flow entering the created brackish marsh through the inflow weir would exit to the west over the utility corridor. The ground surface of the utility corridor would need scour protection, which would be developed in coordination with SDG&E.
- 9. **Impacts.** The impacts of the Eastern Alignment Alternative, the mitigation ratios, and the mitigation required were presented in the table sent in advance of the meeting.
- 10. Available Mitigation Areas and the Proposed Mitigation Concept. The graphic sent in advance of the meeting showed where enhancement and creation would be possible. The following discussion occurred regarding the graphic:
 - The graphic shows the mitigation potential for El Camino Real without incorporating JPA's needs.

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- The 22nd Ag District owns the area of the river where the 0.68 acre of brackish marsh enhancement potential is shown, and where the 0.38 acre of mule fat/southern willow scrub enhancement potential is shown. The 0.24 acre of potential riparian enhancement on the east side of the bridge may not be a viable area for enhancement for the Eastern Alignment because of future shading by the bridge. These areas are not included in the mitigation concept.
- On the east side of the utility corridor, approximately 10.8 acres would be available for brackish marsh creation behind the protective vegetated berm. This is enough area for all of the needed brackish marsh creation (5 acres), and for most of the brackish marsh enhancement (all but approximately 1 acre).
- About 2.9 acres of riparian area along the southern edge of the river could be enhanced by removal of tamarisk.
- Contiguous with the southern river edge, 4.29 acres of mule fat/southern willow scrub could be created, which is more than the acreage needed to mitigate for project impacts. However, this leaves a gap between the berm and the created riparian area that is not desirable to any of the agencies present or to the U.S. Fish and Wildlife Service, who discussed the graphic with CDFG in advance of the meeting. After a group discussion regarding what could be planted in the gap, it was decided that the area of riparian creation will be changed to close the gap.
- The riparian creation area would not meet the definition of Corps wetlands unless the area north of the berm were lowered to the depth of the river. This may not be desirable because it could change river hydraulics.
- More than 3 acres of high salt marsh could be created on the west side of the utility corridor. The area shown on the graphic will be moved to the south, to avoid property owned by CDFG.
- A 100-foot buffer is shown between the brackish marsh creation area and the western side of the proposed pedestrian walkway on widened El Camino Real. The buffer is intended to be planted with native species, likely upland types. CDFG would not want to see this buffer width reduced.
- The berm is required to protect the brackish marsh. However, mule fat is expected to easily flourish on the site without lowering the area. If out-of-kind mitigation were acceptable, the berm could

be eliminated and a high ratio of riparian creation could be provided on the east side of the JPA property. CDFG noted they do want to see brackish marsh created as mitigation for the impacts to clapper rail habitat. The Coastal Commission noted they typically require 4:1 in-kind mitigation for such impacts in the Coastal Zone.

- The Coastal Commission noted they require all impacts in the Coastal Zone to be mitigated by creation, and do not allow enhancement to be counted. Impacts of the Eastern Alignment in the Coastal Zone are 0.61 acre riparian scrub and 0.96 acre coastal wetlands (brackish marsh and salt marsh), with the present Coastal Zone boundary along the eastern edge of existing El Camino Real. Impact acreages in the Coastal Zone will be provided for all alternatives in the environmental document. The City will request a boundary determination from the Coastal Commission for each alternative.
- 11. **Clapper Rail Movement**. Connectivity of the existing clapper rail habitat to the proposed mitigation area is critical. There are an estimated 12 pair of clapper rail between El Camino Real and Morgan Run, according to CDFG. How will the clapper rail know there is a desirable area created, and how will they get into the mitigation area created behind the berm? These questions must be answered in the environmental document.
- 12. **Revised Concept**. Based on the above meeting discussion, a revised concept will be prepared and provided in a separate letter to the permitting agencies. A field meeting could be arranged if the agencies decide it would be beneficial.



June 17, 2005 Project No.103645002

Mr. Edgar A. Camerino, P.E. Rick Engineering Company 5620 Friars Road San Diego, California 92110-2596

Subject: Limited Geotechnical Evaluation JPA Mitigation Project San Diego, California

Dear Mr. Camerino:

In accordance with your request and authorization, we have performed a limited geotechnical evaluation regarding the proposed JPA Mitigation Project, in San Diego, California. The purpose of our evaluation was to provide subsurface data with respect to groundwater elevations (depths) at the site. The data will be used to help evaluate the suitability of the proposed site to be converted to a wetlands area as part of the El Camino Real Bridge widening project.

Our services included review of readily available background information including, previously prepared geotechnical reports prepared by Ninyo & Moore for the proposed widening of the El Camino Real Bridge, geologic maps, topographic maps, and stereoscopic aerial photographs. Our services also included preparation of a County of San Diego Department of Environmental Health boring permit waiver, performance of a field reconnaissance and limited subsurface exploration, analysis of data obtained, and the preparation of this letter report presenting our findings and conclusions.

As you know, we have previously performed a geotechnical evaluation for widening of El Camino Real between Via De La Valle and San Dieguito Road, as well as preparation of a foundation report for the widening of the subject bridge over the San Dieguito River. The proposed exploratory borings for this phase of the project were advanced in the proposed mitigation area, west of the El Camino Real Bridge. The site area slopes gently toward the north (San

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Dieguito River) and is currently being utilized for agricultural purposes. Based on our review of topographic data, the elevation at the site is approximately 20 feet above mean sea level.

Our subsurface evaluation was performed on June 13, 2005, and consisted of the excavation, logging, and sampling of four exploratory borings. The borings were advanced with a hand auger system to the depth of groundwater. Selected soil samples were collected for sample identification. In general, the groundwater depths encountered during our subsurface evaluation ranged from approximately 2.7 feet to 6 feet below the existing ground surface. The borings were backfilled with bentonite in general accordance with the County of San Diego Department of Environmental Health guidelines.

If you have any questions regarding this report, please contact the undersigned. We appreciate the opportunity to be of service on this project.

Respectfully submitted, NINYO & MOORE

Robert T. Wheeler Project Geologist

RTW/RI/gg

Distribution: (1) Addressee

Attachments: - Figure 1 - Site Location Map Figure 2 - Boring Location Map Figure 3 - Boring Logs

Randal L. Irwin, C.E.G. Chief Engineering Geologist





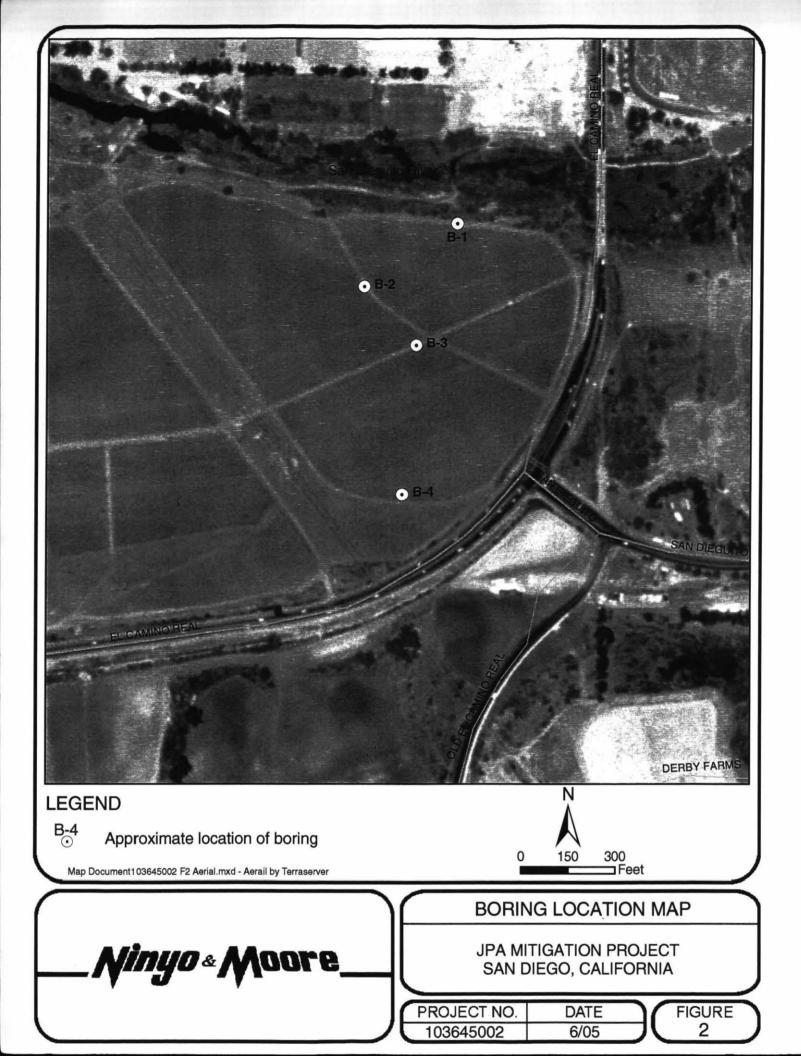


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1927 Fifth Avenue Son Diego, CA 92101-2358 P 619 308 9333 F 619 308 9334 www.recon-us.com

RECON

March 21, 2006

Mr. Norm Arndt **Rick Engineering Company** 5620 Friars Road San Diego, CA 92110-2596

Reference: Results of the Bat Presence/Absence Survey for the El Camino Real Road and Bridge Widening (RECON Number 4256B)

Dear Mr. Arndt:

This letter describes the results of a bat survey conducted on March 16, 2006 for the El Camino Real Road and Bridge Widening project in San Diego, California. The proposed project includes widening El Camino Real from Via de la Valle to San Dieguito Road and widening or replacing the bridge over the San Dieguito River. The purpose of the survey was to determine whether bats are using the bridge.

The survey was conducted between 5:20 P.M. and 6:30 P.M., the temperature was 60 degrees Fahrenheit, wind speeds ranged from one to five miles per hour, and the sky was mostly clear with a band of clouds on the western horizon. Sunset occurred at 5:57 Р.м. The survey methods included visually examining the underside of the bridge for bats and structures that would support bat roosting or nursery sites. The ground below and adjacent to the bridge was also visually examined for bat sign (guano). After visually inspecting the bridge, I monitored the bridge as the sun set and for one half-hour afterward for bats leaving the bridge to begin nighttime foraging.

The bridge design is such that it does not provide much suitable roosting or nursery habitat for bats. The exception is the expansion gap in the center of the bridge. Due to the inundation of the San Dieguito River, it was not possible to examine the expansion gap directly. There are many cliff swallow (Petrochelidon pyrthonota) nests along the side of the bridge, and one black phoebe (Sayomis nigricans semiatra) nest is tucked in a corner under the bridge.

No bats were observed using the bridge, exiting the bridge to begin foraging, or flying with the flocks of swallows flying over the adjacent agricultural fields.

There is a low potential for bats to use this bridge in the future, due to the lack of suitable roosting or nursery areas. However, if the approved project includes impacts to the bridge, a preconstruction clearance survey may be warranted to ensure that bats and/or nesting birds are not impacted during construction.

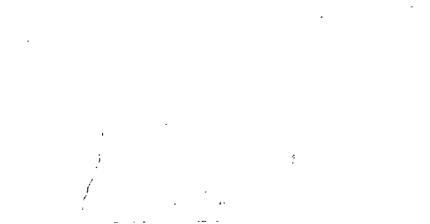
If you have any questions regarding this letter, please do not hesitate to contact me at aclark@recon-us.com or 619-308-9333.

Sincerely,

Amy E. Clark

Biologist

AEC:sh



NATIVE AMERICAN CONTACT LETTERS

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January 17, 2006

Ms. Rhonda Welch-Scalco, Chairperson Barona Band of Mission Indians 1095 Barona Road Lakeside, California 92040

Dear Ms. Welch-Scalco:

Our firm has been retained by Earth Tech, Inc. to conduct an archaeological survey for a portion of El Camino Real in the City of San Diego (Figure 1). Because we have not contacted you since 1998 on this project, one purpose of this letter is too provide you with a current update. Tierra Environmental Services (Tierra) conducted cultural resource inventories of approximately 37 acres in 1998, 2003, 2004, and 2005 for proposed improvements to a portion of El Camino Real crossing the San Dieguito River Valley, to determine if cultural resources would be impacted. The project crosses the San Dieguito River northeast of Del Mar. The project site is located within Sections 6 and 7, T14S, R3W, of the Del Mar 7.5 minute USGS Quadrangle (Figure 2).

The cultural resources study is being conducted pursuant to the National Historic Preservation Act (NHPA), California Environmental Quality Act (CEQA) and City of San Diego Guidelines. A records search was conducted and revealed that one previously recorded site CA-SDI-686 Locus C was located within the area of potential effect (APE). The site was previously determined by the City of San Diego not to be significant, and it was not relocated during the surveys conducted in 1998 and 2003. Overall, 33 previous cultural resource studies have been conducted within a one-mile radius of the project area and 55 previously recorded cultural resources have been located within a one-mile radius of the project area. Three sites CA-SDI-14,969, CA-SDI-8,225/H and CA-SDI-10,117 were recorded adjacent to the project area and an effort was made to ensure that these sites did not extend into the APE. All three of these sites were relocated and found to be outside the APE. We are currently preparing a report for this project.

In addition to informing you about this project, a major purpose of this letter is to request any information that you and other tribal elders may have regarding cultural resources located in the vicinity of the project site, pursuant to City Guidelines and Section 106 of the NHPA. Any information you may have about cultural resources on the property would greatly benefit our study.

If you or other tribal members have any knowledge about cultural resources located on the project site, please contact me. If I can provide any additional information, please contact me immediately at (858)578-9064. Thank you for your assistance.

Sincerely,

Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures

9915 Businesspark Ave., Suite C, San Diego, CA 92131-1120 Phone: (858) 578-9064 ▲ Fax: (858) 578-3646 E-mail: TierraEnv@aol.com



January 17, 2006

Mr. Anthony Pico, Chairman Viejas Band of Kumeyaay Indians P.O. Box 908 Alpine, CA 91903

Dear Mr. Pico:

Our firm has been retained by Earth Tech, Inc. to conduct an archaeological survey for a portion of El Camino Real in the City of San Diego (Figure 1). Because we have not contacted you since 1998 on this project, one purpose of this letter is too provide you with a current update. Tierra Environmental Services (Tierra) conducted cultural resource inventories of approximately 37 acres in 1998, 2003, 2004, and 2005 for proposed improvements to a portion of El Camino Real crossing the San Dieguito River Valley, to determine if cultural resources would be impacted. The project crosses the San Dieguito River northeast of Del Mar. The project site is located within Sections 6 and 7, T14S, R3W, of the Del Mar 7.5 minute USGS Quadrangle (Figure 2).

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Sincerely,

Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures

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January 17, 2006

Mr. Mark Romero, Chairman Mesa Grande Band of Mission Indians P.O. Box 270 Santa Ysabel, California 92070

Dear Mr. Romero:

Our firm has been retained by Earth Tech, Inc. to conduct an archaeological survey for a portion of El Camino Real in the City of San Diego (Figure 1). Because we have not contacted you since 1998 on this project, one purpose of this letter is too provide you with a current update. Tierra Environmental Services (Tierra) conducted cultural resource inventories of approximately 37 acres in 1998, 2003, 2004, and 2005 for proposed improvements to a portion of El Camino Real crossing the San Dieguito River Valley, to determine if cultural resources would be impacted. The project crosses the San Dieguito River northeast of Del Mar. The project site is located within Sections 6 and 7, T14S, R3W, of the Del Mar 7.5 minute USGS Quadrangle (Figure 2).

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Sincerely,

Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures



January 17, 2006

Mr. Allen Lawson, Spokesman San Pasqual Band of Mission Indians P.O. Box 365 Valley Center, California 92082

Dear Mr. Lawson:

Our firm has been retained by Earth Tech, Inc. to conduct an archaeological survey for a portion of El Camino Real in the City of San Diego (Figure 1). Because we have not contacted you since 1998 on this project, one purpose of this letter is too provide you with a current update. Tierra Environmental Services (Tierra) conducted cultural resource inventories of approximately 37 acres in 1998, 2003, 2004, and 2005 for proposed improvements to a portion of El Camino Real crossing the San Dieguito River Valley, to determine if cultural resources would be impacted. The project crosses the San Dieguito River northeast of Del Mar. The project site is located within Sections 6 and 7, T14S, R3W, of the Del Mar 7.5 minute USGS Quadrangle (Figure 2).

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Sincerely,

Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures

9915 Businesspark Ave., Suite C, San Diego, CA 92131-1120 Phone: (858) 578-9064 ▲ Fax: (858) 578-3646 E-mail: TierraEnv@aol.com



January 17, 2006

Mr. Albert Phoenix Barona Band of Mission Indians 1095 Barona Road Lakeside, California 92040

Dear Mr. Phoenix:

Our firm has been retained by Earth Tech, Inc. to conduct an archaeological survey for a portion of El Camino Real in the City of San Diego (Figure 1). Because we have not contacted you since 1998 on this project, one purpose of this letter is too provide you with a current update. Tierra Environmental Services (Tierra) conducted cultural resource inventories of approximately 37 acres in 1998, 2003, 2004, and 2005 for proposed improvements to a portion of El Camino Real crossing the San Dieguito River Valley, to determine if cultural resources would be impacted. The project crosses the San Dieguito River northeast of Del Mar. The project site is located within Sections 6 and 7, T14S, R3W, of the Del Mar 7.5 minute USGS Quadrangle (Figure 2).

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Sincerely,

Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures

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El Camino Real: Native American Mailing List

Ms. Rhonda Welch-Scalco, Chairperson Barona Band of Mission Indians 1095 Barona Road Lakeside, CA 92040

Mr. Albert Phoenix Barona Band of Mission Indians 1095 Barona Road Lakeside, CA 92040

Mr. Allen Lawson, Spokesman Attn: Ms. Dorothy Tavui San Pasqual Band of Mission Indians P.O. Box 365 Valley Center, CA 92082

Mr. Steve Banegas Kumeyaay Cultural Repatriation Committee 1095 Barona Road Lakeside, CA 92040+

Mr. Mark Romero, Chairman Mesa Grande Band of Mission Indians P.O. Box 270 Santa Ysabel, CA 92070

Mr. Anthony Pico, Chairman Viejas Band of Kumeyaay Indians P.O. Box 908 Alpine, CA 91903

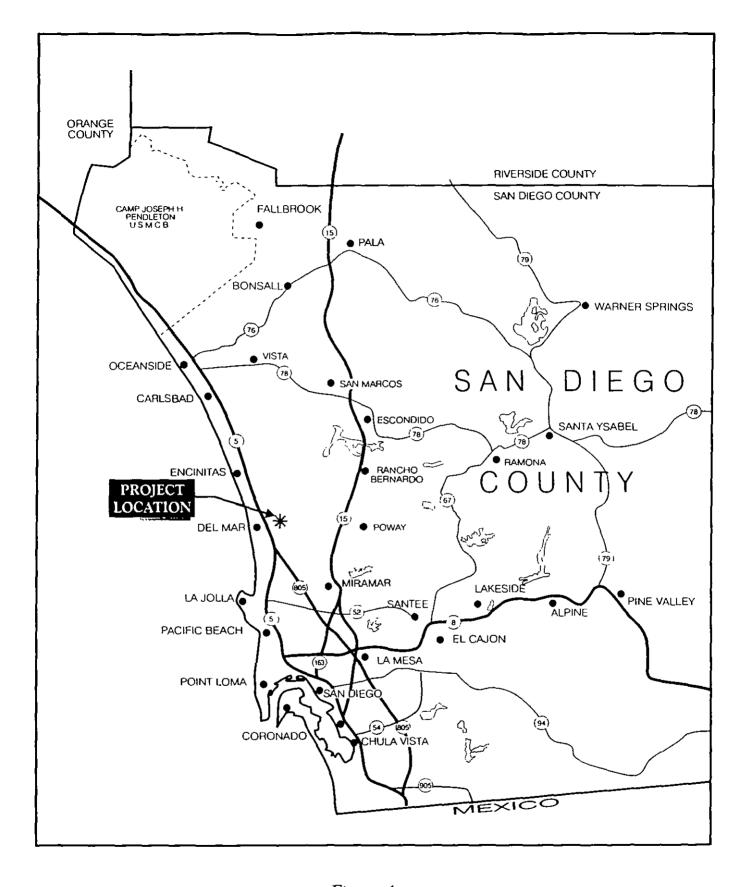
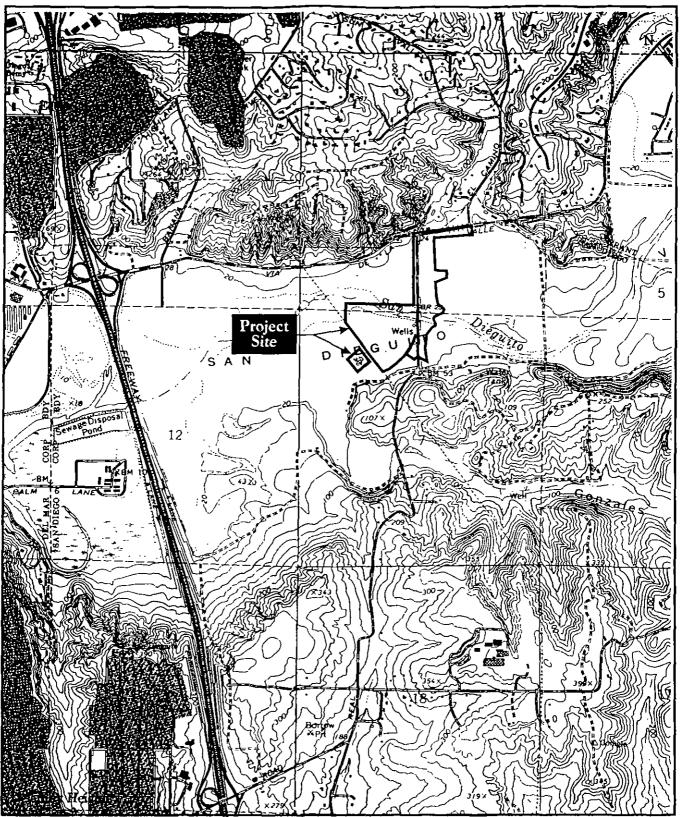




Figure 1 Regional Location Map



TIERRA ENVIRONMENTAL SERVICES



SOURCE: USGS 7.5' Quad Maps (Del Mar 1969 Edition Photorevised in 1975)



Figure 2 Project Location Map



TIERRA Environmental Services



December 11, 1998

Mr. Clifford LaChappa, Chairman Barona Reservation 1095 Barona Road Lakeside, California 92040

Dear Mr. LaChappa:

Our firm has been retained by Earth Tech, Inc. to conduct an archaeological survey for a portion of El Camino Real in the City of San Diego (Figure 1). The proposed project consists of widening El Camino Real to a four-lane road for a length of approximately 0.5 miles between San Dieguito Road and Via de la Valle. The project site is located within Sections 6 and 7, T14S, R3W, of the Del Mar 7.5 minute USGS Quadrangle (Figure 2).

The cultural resources study is being conducted pursuant to the National Historic Preservation Act (NHPA), California Environmental Quality Act (CEQA) and City of San Diego Guidelines. A records search identified site SDM-W-45 at the northern end of the project and CA-SDI-686 (Locus C) near the southern terminus of the project. A cultural resource survey revealed a light scatter of *Mytilus* shell in the area of SDM-W-45, suggesting that at least a portion of the site still exists. The area of CA-SDI-686 Locus C appears to have been heavily impacted by the previous realignment of El Camino Real, although isolated shell fragments near this location suggest a potential for buried deposits in the area. We are currently preparing a draft report for this project.

In addition to informing you about this project, a major purpose of this letter is to request any information that you and other tribal elders may have regarding cultural resources located in the vicinity of the project site, pursuant to City Guidelines and Section 106 of the NHPA. Any information you may have about cultural resources on the property would greatly benefit our study.

If you or other tribal members have any knowledge about cultural resources located on the project site, please contact me. If I can provide any additional information, please contact me immediately at 619-578-9064. Thank you for your assistance.

Sincerely,

Michael Bakel

Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures

9903-E Businesspark Ave., San Diego, CA 92131-1120 Phone: (619) 578-9064 ▲ Fax: (619) 578-3646

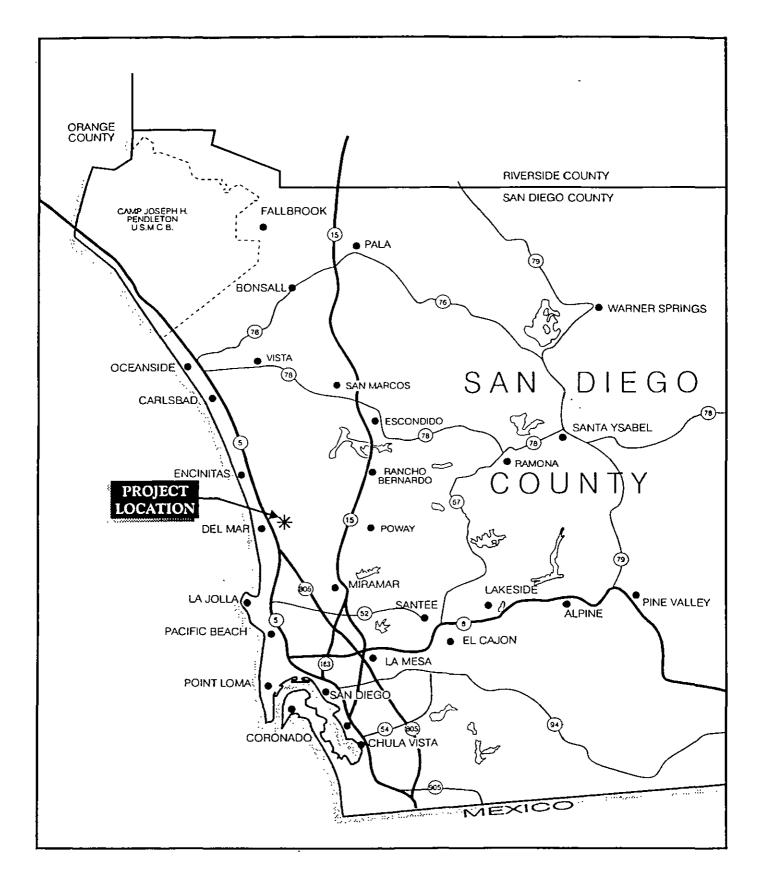
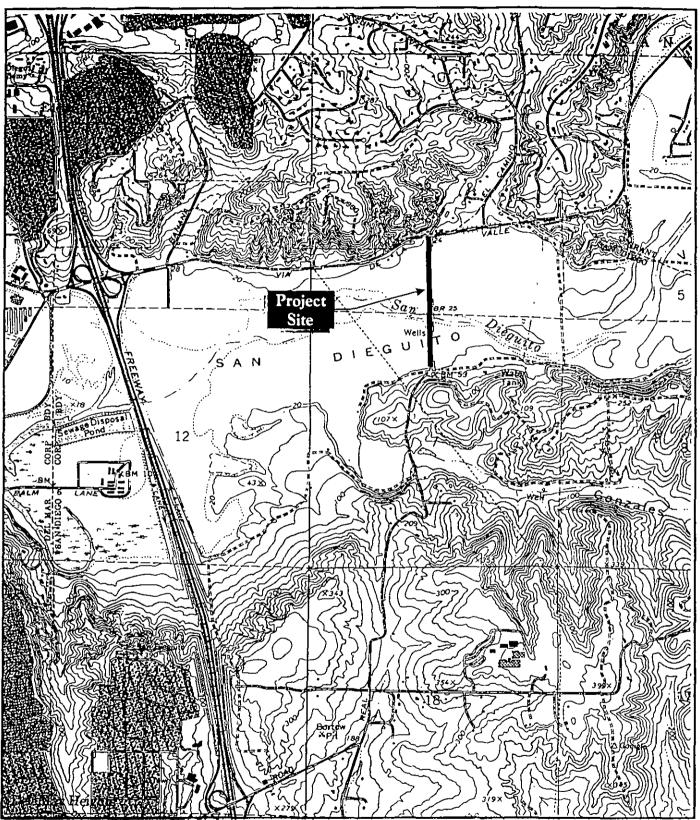


Figure 1 Regional Location Map



ENVIRONMENTAL SERVICES



SOURCE: USGS 7.5' Quad Maps (Del Mar 1969 Edition Photorevised in 1975)



Figure 2 Project Location Map



TIERRA ENVIRONMENTAL SERVICES

El Camino Real Widening: Native American Mailing List

Mr. Clifford LaChappa, Chairman Barona Group of the Capitan Grande Band of Mission Indians 1095 Barona Road Lakeside, California 92040

Mr. Albert Phoenix Barona Group of the Capitan Grande Band of Mission Indians 1095 Barona Road Lakeside, California 92040

Mr. Ralph Goff, Chairman Campo Band of Mission Indians 36190 Church Road, Suite 1 Campo, California 91906

Tribal Chairman Capitan Grande General Council 1095 Barona Road Lakeside, California 92040

Mr. Tony J. Pinto, Chairman Cuyapaipe Band of Mission Indians 2271 Alpine Blvd #D Alpine, California 91901

Ms. Rebecca Maxcy Inaja & Cosmit Reservation P.O. Box 186 Santa Ysabel, California 92070

Mr. Kenneth Meza, Chairperson Jamul Band of Mission Indians P.O. Box 612 Jamul, California 91935

Ms. Gwendolyn Parada, Chairperson La Posta Reservation 8 Crestwood Road Boulevard, California 91905 -

Ms. Frances Shaw, Chairperson Manzanita Band of Mission Indians P.O. Box 1302 Boulevard, California 91905

Mr. Howard Maxcy, Chairman Mesa Grande Band of Mission Indians P.O. Box 270 Santa Ysabel, California 92070

Mr. Allen Lawson, Spokesman Attn: Ms. Dorothy Tavui San Pasqual Band of Mission Indians P.O. Box 365 Valley Center, California 92082

Mr. Ben Scerato, Chairman Santa Ysabel Band of Diegueño Indians P.O. Box 130 Santa Ysabel, California 92070

Ms. Georgia Kimble, Spokesperson Sycuan Band of Mission Indians 5459 Dehesa Road El Cajon, California 92019

Mr. Anthony Pico, Chairman Viejas Group of Capitan Grande Band of Mission Indians P.O. Box 908 Alpine, California 91903

.

Mr. Clarence Brown Viejas Group of Capitan Grande P.O. Box 908 Alpine, California 91903



December 11, 1998

Mr. Ralph Goff, Chairman Campo Band of Mission Indians 36190 Church Road, Suite 1 Campo, California 91906

Dear Mr. Goff:

Our firm has been retained by Earth Tech, Inc. to conduct an archaeological survey for a portion of El Camino Real in the City of San Diego (Figure 1). The proposed project consists of widening El Camino Real to a four-lane road for a length of approximately 0.5 miles between San Dieguito Road and Via de la Valle. The project site is located within Sections 6 and 7, T14S, R3W, of the Del Mar 7.5 minute USGS Quadrangle (Figure 2).

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If you or other tribal members have any knowledge about cultural resources located on the project site, please contact me. If I can provide any additional information, please contact me immediately at 619-578-9064. Thank you for your assistance.

Sincerely,

Wichard Brlich

Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures



December 11, 1998

Tribal Chairman Capitan Grande General Council 1095 Barona Road Lakeside, California 92040

Dear Tribal Chairman:

Our firm has been retained by Earth Tech, Inc. to conduct an archaeological survey for a portion of El Camino Real in the City of San Diego (Figure 1). The proposed project consists of widening El Camino Real to a four-lane road for a length of approximately 0.5 miles between San Dieguito Road and Via de la Valle. The project site is located within Sections 6 and 7, T14S, R3W, of the Del Mar 7.5 minute USGS Quadrangle (Figure 2).

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Sincerely,

Michael Babel

Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures



December 11, 1998

Mr. Tony J. Pinto, Chairman Cuyapaipe Band of Mission Indians 2271 Alpine Blvd #D Alpine, California 91901

Dear Mr. Pinto:

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Michael Brhah

Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures

9903-E Businesspark Ave., San Diego, CA 92131-1120 Phone: (619) 578-9064 ▲ Fax: (619) 578-3646



December 11, 1998

Ms. Rebecca Maxcy Inaja & Cosmit Reservation P.O. Box 186 Santa Ysabel, California 92070

Dear Ms. Maxcy:

Our firm has been retained by Earth Tech, Inc. to conduct an archaeological survey for a portion of El Camino Real in the City of San Diego (Figure 1). The proposed project consists of widening El Camino Real to a four-lane road for a length of approximately 0.5 miles between San Dieguito Road and Via de la Valle. The project site is located within Sections 6 and 7, T14S, R3W, of the Del Mar 7.5 minute USGS Quadrangle (Figure 2).

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Sincerely,

Michael Brikeh

Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures



December 11, 1998

Mr. Kenneth Meza, Chairperson Jamul Band of Mission Indians P.O. Box 612 Jamul, California 91935

Dear Mr. Meza:

Our firm has been retained by Earth Tech, Inc. to conduct an archaeological survey for a portion of El Camino Real in the City of San Diego (Figure 1). The proposed project consists of widening El Camino Real to a four-lane road for a length of approximately 0.5 miles between San Dieguito Road and Via de la Valle. The project site is located within Sections 6 and 7, T14S, R3W, of the Del Mar 7.5 minute USGS Quadrangle (Figure 2).

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Sincerely,

Michael Ballety

Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures



December 11, 1998

Ms. Gwendolyn Parada, Chairperson La Posta Reservation 1064 Barona Road Lakeside, California 92040

Dear Ms. Parada:

Our firm has been retained by Earth Tech, Inc. to conduct an archaeological survey for a portion of El Camino Real in the City of San Diego (Figure 1). The proposed project consists of widening El Camino Real to a four-lane road for a length of approximately 0.5 miles between San Dieguito Road and Via de la Valle. The project site is located within Sections 6 and 7, T14S, R3W, of the Del Mar 7.5 minute USGS Quadrangle (Figure 2).

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Sincerely,

Michael Balleh

Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures



December 11, 1998

Mr. Howard Maxcy, Chairman Mesa Grande Band of Mission Indians P.O. Box 270 Santa Ysabel, California 92070

Dear Mr. Maxcy:

Our firm has been retained by Earth Tech, Inc. to conduct an archaeological survey for a portion of El Camino Real in the City of San Diego (Figure 1). The proposed project consists of widening El Camino Real to a four-lane road for a length of approximately 0.5 miles between San Dieguito Road and Via de la Valle. The project site is located within Sections 6 and 7, T14S, R3W, of the Del Mar 7.5 minute USGS Quadrangle (Figure 2).

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Sincerely,

Wichael Bruch

Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures



TIERRA ENVIRONMENTAL SERVICES

December 11, 1998

Mr. Allen Lawson, Spokesman San Pasqual Band of Mission Indians P.O. Box 365 Valley Center, California 92082

Dear Mr. Lawson:

Our firm has been retained by Earth Tech, Inc. to conduct an archaeological survey for a portion of El Camino Real in the City of San Diego (Figure 1). The proposed project consists of widening El Camino Real to a four-lane road for a length of approximately 0.5 miles between San Dieguito Road and Via de la Valle. The project site is located within Sections 6 and 7, T14S, R3W, of the Del Mar 7.5 minute USGS Quadrangle (Figure 2).

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Sincerely,

Michael Bakely

Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures



December 11, 1998

Mr. Ben Scerato, Chairman Santa Ysabel Band of Diegueño Indians P.O. Box 130 Santa Ysabel, California 92070

Dear Mr. Scerato:

Our firm has been retained by Earth Tech, Inc. to conduct an archaeological survey for a portion of El Camino Real in the City of San Diego (Figure 1). The proposed project consists of widening El Camino Real to a four-lane road for a length of approximately 0.5 miles between San Dieguito Road and Via de la Valle. The project site is located within Sections 6 and 7, T14S, R3W, of the Del Mar 7.5 minute USGS Quadrangle (Figure 2).

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Michael Brlich

Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures



December 11, 1998

Ms. Georgia Kimble, Spokesperson Sycuan Band of Mission Indians 5459 Dehesa Road El Cajon, California 92019

Dear Ms. Kimble:

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Michael Bachel

Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures



TIERRA ENVIRONMENTAL SERVICES

December 11, 1998

Mr. Anthony Pico, Chairman Viejas Group of Capitan Grande Band of Mission Indians P.O. Box 908 Alpine, California 91903

Dear Mr. Pico:

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Sincerely,

Michael Britch

Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures

9903-E Businesspark Ave., San Diego, CA 92131-1120 Phone: (619) 578-9064 ▲ Fax: (619) 578-3646



TIERRA Environmental Services

December 11, 1998

Mr. Clarence Brown Viejas Group of Capitan Grande Band of Mission Indians P.O. Box 908 Alpine, California 91903

Dear Mr. Brown:

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Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures

9903-E Businesspark Ave., San Diego, CA 92131-1120 Phone: (619) 578-9064 ▲ Fax: (619) 578-3646



TIERRA ENVIRONMENTAL SERVICES

December 11, 1998

Mr. Albert Phoenix Barona Indian Reservation 1095 Barona Road Lakeside, California 92040

Dear Mr. Phoenix:

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Enclosures

9903-E Businesspark Ave., San Diego, CA 92131-1120 Phone: (619) 578-9064 ▲ Fax: (619) 578-3646



TIERRA Environmental Services

December 11, 1998

Ms. Frances Shaw, Chairperson Manzanita Band of Mission Indians P.O. Box 1302 Boulevard, California 91905

Dear Ms. Shaw:

Our firm has been retained by Earth Tech, Inc. to conduct an archaeological survey for a portion of El Camino Real in the City of San Diego (Figure 1). The proposed project consists of widening El Camino Real to a four-lane road for a length of approximately 0.5 miles between San Dieguito Road and Via de la Valle. The project site is located within Sections 6 and 7, T14S, R3W, of the Del Mar 7.5 minute USGS Quadrangle (Figure 2).

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CITY OF SAN DIEGO EL CAMINO REAL ROAD/BRIDGE PROJECT AGENCIES MEETING

Meeting Notes for September 26, 2012

Attendees

City: Kerry Santoro, Jerry Jakubauskas, Brad Johnson Rick Engineering: Edgar Camerino, Brendan Hastie RECON: Lisa Lind Hon Consulting: Katherine Hon Nordby Biological: Chris Nordby RBF: Monica Kling Caltrans: Kevin Hovey, Bob James CDFG: Tim Dillingham, Libby Lucas, Kyle Dutro US Fish and Wildlife: Sally Brown USACOE: Michelle Madsen, Stephanie Hall State Water Board: Alan Monji

Discussion

1. Review of Project Purpose and Need (City) – Following introductions, Kerry provided an overview of the project, including the project purpose related to the structural deficiencies and potential flood hazards of the existing El Camino Real Bridge. The bridge is not high enough for a 100 year flood event and does not meet current seismic standards.

2. Background/History/Timetable (City) – 1998 FHWA approved funding for the project with a 10-year timeline. In 2006 a Draft EIR was circulated for public review. Since that time, the City has been looking into additional alternatives and narrowing the footprint in response to community and agency concerns. The City also updated technical studies. The City was also granted an extension from FHWA and as a result is looking to complete the environmental by March 2013. Because the March 2013 deadline may not be met, Caltrans on behalf of the City has requested an unprecedented second extension. The City is currently waiting for the FHWA decision.

3. Current Project/Changes from Past Project - Bridge Design (Rick Engineering) - Edgar and Brendan reviewed the major changes, including: a reduction of 18-feet for the cross sections with reduced widths for travel lanes, bicycle lanes, and medians, a new tie-in to the D R Horton project, and eliminating the channel on the Kruer (former Hu) property in place of a new storm drain plan. Removal of the existing bridge after construction of a new bridge, and the introduction of roundabout alternatives are also changes from the past project. USACOE requested clarification on the length of the bridge and requested that a longer bridge be evaluated. Brendan indicated that the proposed bridge meets the hydraulic requirements. A longer bridge is discussed in the Alternatives Considered but Rejected chapter of both the EIR and the EA. The current proposed bridge design maintains the width of the channel for the protection of clapper rail habitat, and a longer bridge would not provide a benefit to clapper rail habitat. The river channel only carries the 10-year flow within its banks. Higher flows overtop the river banks. The substructure of the bridge needs to be clearly defined and may need to be retained so as not to negatively affect that area. All aboveground elements of the existing bridge will be removed entirely. When the engineers say the "substructure" would remain, they mean the buried piles. Rick Engineering clarified that the bridge for the Eastern Alignment and Roundabout alternatives is at an angle for geometry, so the road can meet De La Valle Place. This design does not affect hydraulics because the columns are round.

Agencies requested additional exhibits be added to the document, including an existing cross-section and a cross-section exhibit for each of the project alternatives. In addition, the location of the sewer line and protective rip rap blanket should be noted. Sally would like to see the rip rap blanket removed if it isn't

necessary to protect the columns; however, we need to look at whether a stabilized river bed may be something the clapper rail like and therefore replacing the rip rap blanket would be needed to avoid impacts.

The agencies requested that the environmental documents disclose that this project would not limit or preclude what can happen on the Fairbanks Ranch property, including creation of additional riparian areas. CDFG clarified that the diagram of mitigation that was supposed to occur attached to their 2006 letter was to be a gentle transition of freshwater marsh with riparian scrub terrace, not a widening of the river.

Michelle asked for clarification of the City departments and Kerry explained what Real Estate Assets, Development Services, and Capital Improvements do.

4. Bridge Construction Methodology Memorandum (Rick Engineering) – Rick Engineering discussed the two methodologies that will be included in the Draft EIR: berm versus trestle. The agencies provided their major concerns: berm would result in fill and a potential for washout during a significant rain event while the trestle would require piles for false work. The trestle would allow construction equipment to be above low river flows. CDFG requested data for sediment transport through the river channel and clear description of the materials that will be used to construct the berm. Kevin suggested that the environmental documents explain what storm event might wash out a berm. USACOE said the trestle may be preferable to the berm for construction; however, the agencies did not identify a preferred method and noted they will wait until the Draft EIR is out for public review in order to assess impacts for both options. All are looking for analysis that considers wildlife movement, hydrology, and duration of construction.

5. Other Impacts/Concerns (Nordby/Agencies) – USFWS brought up potential impacts to mule-fat scrub as a result of the grading under the north abutment. Brad mentioned that the north bridge abutment of the new bridge will be approximately 9 feet higher than the existing bridge, and as a result of the new fill, the existing vegetation will be disturbed regardless of whether or not a trail is constructed. There was confusion about the map of biological impacts showing impacts west of the existing bridge, and this needs to be clarified. The north abutment has been designed to accommodate a planned JPA trail. Per NEPA Section 4(f) requirements the project must not preclude any existing or future (planned) trail. This issue will be looked at. Eastern Alignment as City preferred alternative was raised as a concern by both wildlife agencies due to potential wetland impacts. Environmental documents need to clearly state impacts from all alternatives. Kevin stated Caltrans does not know yet which alternative is less impactive, and emphasized they have to consider more than biological resources impacts.

6. Mitigation (City/Nordby/Agencies) - Project impacts include disturbance of the salt marsh on the Kruer property, however mitigation for this vegetation community is not available on the JPA mitigation site for this project. There would be excess freshwater marsh creation available to satisfy the other mitigation requirements, and that could include Clapper Rail habitat mitigation needs. Chris noted that the mitigation approach to be ultimately approved will dictate if the JPA mitigation site can accommodate all of the mitigation needs for the project. Michelle noted that a proposed invasives removal plan in the river that would be implemented sooner rather than later would be viewed favorably. They are looking for a watershed approach. Tamarisk and pampas grass removal upstream would help protect the future W-19 restoration and the San Dieguito Lagoon restoration downstream. She suggested proposing this aspect as part of the mitigation plan rather than having the agencies require it as maintenance. Libby asked what was the invasive removal requirement for Fairbanks Ranch and the Polo Field code violation. This cannot be counted twice and may limit the "credit" for invasive removal plans as part of El Camino Real. Michelle stated they understand the expense associated with the "in perpetuity" requirement and would accept a defined time frame. The City will confirm if this mitigation has already been established as mitigation for the Fairbanks Ranch project and if it would be a viable option for this project. The agencies were interested in what would happen to the vacated roadway. Sally, Michelle and Libby agreed they would like to see the asphalt removed. Jerry explained that a portion will need to be retained for access to adjacent properties. The agencies asked if any of the W-19 acreage would be available for Fairbanks Ranch mitigation, and Kerry said she didn't think so, given the number of projects already wanting to use the mitigation area, including LOSSAN, I-5 widening, and EI Camino Real.

From: Elizabeth Lucas [mailto:ELucas@dfg.ca.gov]
Sent: Thursday, November 15, 2012 12:50 PM
To: Santoro, Kerry
Cc: Kyle Dutro; Tim Dillingham; 'kevin_hovey@dot.ca.gov'; 'Robert A James'; Sally Brown@fws.gov; nordbybio@gmail.com; aashimine@rbf.com; 'Lisa Lind'; bhastie@rickengineering.com; ecamerino@rickengineering.com; Johnson, Brad; Marsden, Dean; Jerry Jakubauskas; Michelle L SPL Mattson; stephanie.j.hall@usace.army.mil; Alan@Waterboards' 'Monji
Subject: El Camino Real Project Update Meeting Minutes

Hello Kerry,

Thank you for the minutes of the 9-26 meeting on the El Camino Real Bridge Project (Project). Just for the record, the minutes did not capture the following two points made during the meeting (for our purposes, this email effectively modifies the minutes).

1. DFG requested that the recirculated EIR address all the comments in the Wildlife Agencies' October 26, 2006, letter on the draft EIR for the Project.

2. Because the equestrian trail was a subject of significant discussion during the meeting, DFG explicitly pointed to comment #11 in that 2006 letter; that comment addresses the need for the EIR to include in its analysis the impacts of the equestrian trail (not just the grading for the trail).

Regarding the discussion of invasive species removal in San Dieguito River (item #6 in the minutes), attached is DFG's 2003 letter re: the last nine holes of the Fairbanks Ranch golf course; see #7 on page 4 re: the invasive species removal within the River. I assume that the City also required on-going invasive species removal within this reach of the River, but don't know for sure.

I think you were going to include the sign-in sheet for the 9-26 meeting with the minutes. Would you please email it out now?

Thank you.

Libby

Libby Lucas Staff Environmental Scientist NCCP Program California Department of Fish and Game 3883 Ruffin Road San Diego CA 92123 Phone: 858 467-4230 Fax: 858 467-4299 e-mail: <u>ELucas@dfg.ca.gov</u>



GRAY DAVIS, Governor

DEPARTMENT OF FISH AND GAME http://www.dfg.ca.gov 4949 Viewridge Avenue San Diego, CA 92123 (858) 467-4201



June 9, 2003

Jon Petke The Planning Associate 3151 Airway Avenue, Suite R-1 Costa Mesa, CA 92626

Subject: Notification of Lake or Streambed Alteration Notification No. R5-2003-0139 (Fairbanks Ranch Country Club Golf Course Completion)

Dear Mr. Petke;

This letter is in response to the Lake or Streambed Alteration Notification Package (No. R5-2003-0135) that you submitted to the Department of Fish and Game (Department) for your proposed completion of the Fairbanks Ranch Country Club's golf course, located within the City of San Diego, San Diego County.

The Fairbanks Ranch Country Club's ("FRCC") project restarts construction work to complete the nine "holes" necessary to make the existing 18 holes of golf consistent with the originally approved 27-hole golf course complex, and complete the restoration of wetland/riparian habitats. The Department originally authorized the 27-hole golf course project pursuant to Streambed Alteration Agreement Notification No.V-82-311, issued on January 20, 1983. The northern perimeter of the project (i.e., the south river channel) was designed and approved for an earthen berm and rip-rap with a variable slope gradient built up to the 22-23 foot contour. It was constructed as designed along most of the realigned river, but in the area now targeted for completion of the nine holes of golf, the interim grading has built the area up to the approximate 10-14 foot level.

Project Description

FRCC purposes to complete construction of the golf course substantially as it was originally designed and authorized, with the construction of the final nine "holes" of golf. This work also includes raising the river channel berm on the northern edge of the construction site to its originally designed 22-23 foot contour level.

In completing the golf course complex, FRCC will undertake to enhance and maintain existing riparian habitat, and create new riparian habitat, using the native riparian plants prescribed by the original Landscape Concept Plan. See attached <u>Table 1</u> and <u>Exhibits D-1 and D-2</u> for the

listing and location of the existing 97 acres of riparian habitat, its status and its proposed enhancement ("use area" 1-3), and the proposal to create 12 new acres of marsh and riparian inter-connected habitat ("use area" 4 on Exhibit D-2) that is included as part of the proposed completion of the remaining nine holes of golf. The result is 109 acres of riparian habitat. The location of these wetlands is generally conforming to the original project description; however, FRCC has proposed to shift approximately 12 acres of mitigation area from the northern edge of the San Dieguito River to the south. FRCC shall annually monitor and report to the Department for five years on the status of this riparian habitat enhancement and creation undertaking.

Although not required by any project approvals nor credited as habitat mitigation by the Department, FRCC has committed to incorporate an additional 15 acres of marsh and/or riparian habitat into the nine hole golf course design ("use area" 7, 8 on <u>Table 1</u>, as depicted on <u>Exhibits</u> <u>D-1 and E</u>). Combining this with the existing 4 acres of preserved willow pond ("use area" 5) and the 19 acres of previously created lakes on the existing 18-hole golf course ("use area" 6), the overall aquatic/riparian habitat total associated with the 27-hole complex will be 147 acres. See <u>Table 1</u>.

Described in more detail below is the planned construction associated with the completion of the nine holes of golf and the planned work on the existing river channel berm.

Golf Course Construction Work

The nine hole construction project will involve clearing and grubbing, depositing additional clean fill and associated rough grading to reconfigure the construction base, and finally, finished contour grading and installation of the golf course components (tee boxes, fairways, greens, cart path, etc.). See Exhibit F for a schematic of the finished site.

Environmental Commitments:

- At a minimum, a total of 109 acres of riparian habitat will be enhanced, maintained, and created as described on <u>Table 1</u>, including 12 new acres of interconnected marsh and riparian habitat incorporated into the design of the 9-hole golf course completion ("use area" 4 on <u>Table 1</u>).
- A soft-bottom overpass structure will be created for the existing golf course cart path that currently crosses through the existing depression located in "Area 1" on <u>Exhibit D-2</u>. The will allow for a natural habitat corridor connection between the planned riparian areas in the nine hole construction area and the San Dieguito River channel.

River Channel Berm Work

The river channel berm work will involve widening the inland reach of the river's south

perimeter with an approximately ten-foot setback and raising its berm height from the existing 10-14 feet to 22-23 feet. No construction work, equipment or workers will be operating within the existing riparian vegetation. This will be accomplished by staking the upland edge of the existing riparian vegetation dripline (including any pickleweed that is part of the riparian line of vegetation). An additional 5-foot buffer will be added to this exclusion zone.

Above the 5-foot buffer, the existing berm will be widened in the upland area (*i.e.*, away from the riparian vegetation) and raised by excavating into the existing graded area down to the water line and sloping the reconfigured berm back, with additional earthen fill, to its new height of 22-23 feet. Native planting with trees and shrubs from the approved Landscape Plan will be installed to stabilize the berm slope. Subject to specific field construction opportunities, the excavated portion of the berm cut will only be partially backfilled so as to leave a "shelf" along the river's edge that will be conducive to the establishment of riparian willows and other native riparian species. See Exhibits G-1, G-2, G-3 for a series of schematics illustrating this construction work.

Environmental Commitments:

- 3. All work will be conducted above a five foot buffer measured from the 8-10 foot contour line which describes the upland edge of the river's riparian vegetation. This line will be staked and contractors will be required to keep men and equipment on the upland side of this line.
- 4. Best management practices will be employed to insure that the construction work will not result in discharges to the river. These BMPs, summarized from the SWPPP, include, but are not limited to:
 - a Vehicle and equipment service
 - b. Material delivery, handling and storage
 - c. Dust control
 - d. Sediment basins
 - e. Slope stabilization
 - f. Drain inlet protection
 - g. Spill prevention and response.
- 5. Once completed, the river side berm will be vegetated with native riparian and upland plant species from the Landscape Plan's approved plant list. See <u>Exhibit H</u>. Generally, Sand Bar Willow Thickets, Arroyo Willow Forest, and Black Willow Hummocks will be planted in the lower reaches of the river berm, and groves of cottonwood and sycamores will be planted in the upper reaches. The source plant material will include, to the extent available, seeds and cuttings recovered from the riparian species that can occasionally be found growing in upland areas away from

the existing riparian vegetation line.

- 6. All earth moving work will occur between April 15th and October 15th, 2003 (unless otherwise approved by the Department).
- On an annual basis, the FRCC will cause the removal of non-native vegetation in the San Dieguito river channel south perimeter and throughout the riparian areas of the completed 9-hole area.

In the river channel itself, the non-native plant removal will focus on hand removal of tamarisk; however, if other invasive exotic species are encountered, they will also be removed. The only equipment used in the river channel will be hand held chainsaws and other handheld tools. Removal of the tamarisk trees will be carefully undertaken in a manner to avoid, to the extent practicable, any adverse effect on the existing native riparian habitat. The tamarisk removal is scheduled to occur after September 15th of this year, but before the onset of the rainy season. If necessary due to early rains, tamarisk removal would be continued until the fall of 2004.

Enhancement activities shall comply with California Fish and Game Code Section 3503, which prohibits the take, possession or needless destruction of the nest or eggs of any bird. Therefore, unless a nesting survey is conducted by qualified biologist seven-days (or less) prior to riparian habitat enhancement activities, such activities will be conducted out-side of nesting season (March 15 through July 31). All nest sites shall be avoided until the nest is no longer active, and the young are no-longer dependent on the parent(s). A minimum 100-foot work exclusion zone will be established around an active nest by using flagging ribbon, or similar method. The work exclusion zone could be modified, based on the sensitivity of the species to human presence and activity. The Department shall be provided copies of the biologist's field notes for the nesting survey prior to commencing activities.

Construction practices common to work on both the river channel berm and the golf course construction will include pre-construction surveys by qualified biologists for nesting birds as well as any endangered or threatened species, including the least Bell's vireo among others. Construction will not commence without the advance approval of the Department in any area where nesting birds or any listed species are found. A one million dollar construction bond is posted in favor of the City of San Diego to financially guarantee the completion of the project elements, including the proposed riparian habitat enhancement and creation work described herein. FRCC will cause a post-construction monitoring report to be completed by a qualified biologist which will evaluate the effect of the environmental commitments and will make recommendations, if any are required, to address any documented shortcoming in the intended effect of the commitments. This document will be provided to the Department for review and

comment.

FRCC intends for the subject grading work to commence during June 2003. FRCC's contractor is Ranger Construction Industries, Inc. All earth moving work is scheduled for completion by October 15, 2003.

To help evaluate and monitor the success of these commitments, FRCC has given permission for site visits from any representative of the Department at any time. For safety and liability purposes, FRCC requests that the Department give as much advance notice as possible prior to visiting the site so that appropriate arrangements can be made. Please note that Department Peace Officers have authority per law to enter onto properties when they are carryout their law enforcement duties, and no statements in this letter should be interpreted to limit a Department Peace Officer's right of entry as defined by State law.

Conclusion

Based on the Department's review of the information you submitted and through a site visit (conducted by Don Chadwick of the Department), the Department has determined that a Streambed or Lake Alteration Agreement is not required for your project or activity because the project or activity 1) does not substantially divert, obstruct, or change any natural flow or bed, channel, or bank of a river, stream, or lake, or 2) use material from a streambed, or 3) substantially adversely effect existing fish or wildlife resources.

As a result, you may begin your project or activity if you have obtained all other necessary permits. If the project or activity changes from that stated in the submitted notification package above, a new notification shall be submitted to the Department.

Nothing in this letter authorizes the Operator to trespass on any land or property, nor does it relieve the Operator of responsibility for compliance with applicable federal, state, or local laws or ordinances. This letter does not constitute the Department's endorsement of the proposed project or activity, or assures the Department's concurrence with permits required form other agencies.

A copy of this letter and attachments thereto should be readily available at the work site(s) at all times during periods of active work and must be presented to any Department personnel, or personnel from another agency upon demand.

Sincerely,

4 R. Mandurak

Donald R. Chadwick Senior Environmental Scientist

Attachments:

- Table-1 Exhibit D-1 Exhibit D-2 Exhibit E Exhibit F Exhibit G-1 Exhibit G-2 Exhibit G-3 Exhibit H
- cc: Stream Alteration Compliance Team Cathy Cibit, City of San Diego

TABLE 1

SUMMARY OF RIPARIAN AREAS

The table below is a summary Project Description of the existing and proposed riparian areas associated with FRCC's proposed completion of the 9-holes of golf at its existing golf course.

Use Area Number	Area of Use	Riparian Acreage	Current Status	Project Description
1	Excavated Channel	65 <u>+</u> 1	Riparian vegetation with tamarisk and other non-native plants	Remove the non- native tamarisk.
2	Riparian Vegetation	13 (Area 'K') 6 (Area '8')	Riparian vegetation with non-native plants	Remove the non- native plants.
3	East Tributary	13	Riparian vegetation with non-native plants	Remove the non- native plants.
4	West - Water/Marsh Area (Created))	12	Rough graded; populated with non-native plants	Creation of 12 acres of water/marsh areas in the 9-hole proposed area.
RIPARIAN ACREAGE TOTAL		109		
5	Preserved Willow Pond	4	Intact.	N/A
6	Lakes (Existing)	19	Intact.	N/A
7	Wetland/Riparian Planting (Created)	12	Rough graded, populated with non-native plants.	To be created.
8	East – Water Marsh Area (Created)	3	Rough graded, populated with non-native plants.	To be created.
AQUATIC HABITAT TOTALS		147		

¹ The original 300-foot wide excavated channel has been widened to 550 feet where it turns west and has been fully vegetated. The entitlement to remove vegetation from the channel for flood conveyance purposes is neither valid any longer nor is it proposed by the applicant or the City.

From: Greer, Keith [mailto:Keith.Greer@sandag.org]
Sent: Tuesday, May 20, 2014 11:19 AM
To: Marsden, Dean
Cc: 'Lavender-Martin, Sandra E@DOT'
Subject: RE: REMP Working Group Meeting Minutes (I-5 NCC Project)

Dean – Here are the USFWS, USACE-LA and CCC emails regarding the language on temporary impacts associates with the lagoon enhancements.

Sandra can you pass along Tim Dillingham's comments and any comments from the Carlsbad USACE.

What this means for you, is that the resources agencies are not going to require that we mitigate areas of wetlands that we impact. We may not get credit, but they will not call them an impact and there will be no ratio applied to the restoration.

If you have any question please call.

Keith Greer, SANDAG 619-699-7390

From: Brown, Sally [mailto:sally_brown@fws.gov] Sent: Tuesday, May 20, 2014 11:12 AM

To: Lavender-Martin, Sandra E@DOT

Cc: aevans@dudek.com; Kosup, Allan R@DOT; awinecki@dudek.com; Jacobo, Arturo@DOT; Bryant.Chesney@noaa.gov; April, Bruce@DOT; goldmann.elizabeth@epa.gov; Buhr, Gabriel@Coastal; Greer, Keith; Smith, Kim T@DOT; Porter, Mike@Waterboards; McCaffery, Emery@DOT; Harrison, Shay Lynn M@DOT; Spencer.D.Macneil@usace.army.mil; Stephanie.J.Hall@usace.army.mil; Scatolini, Susan@DOT; susan_wynn@fws.gov; Brown, Kanani@Coastal; mcooper@scc.ca.gov; Larry.Vinzant@dot.gov; tim_dillingham@wildlife.ca.gov; Therese.O.Bradford@usace.army.mil; Meris.Bantilan-Smith@usace.army.mil **Subject:** Re: FW: Temporary Impact/Mitigation Language + REMP WKGP Structure

Subject: Re: FW: Temporary Impact/willigation Language + REMP WKGP Structure

Hi Sandra, Susan and I have no further comments, thanks for the opportunity to review!

Sally Brown U. S. Fish and Wildlife Service 2177 Salk Avenue, Suite 250 Carlsbad, CA 92008 Office: (760) 431-9440 x278 Cell: (619) 261-6027 FAX: (760) 431-5901 Sally Brown@fws.gov

From: Hall, Stephanie J SPL [mailto:Stephanie.J.Hall@usace.army.mil] Sent: Tuesday, May 20, 2014 9:58 AM To: Buhr, Gabriel@Coastal; Lavender-Martin, Sandra E@DOT; aevans@dudek.com; Kosup, Allan R@DOT; awinecki@dudek.com; Jacobo, Arturo@DOT; Bryant.Chesney@noaa.gov; April, Bruce@DOT; goldmann.elizabeth@epa.gov; Greer, Keith; Smith, Kim T@DOT; Porter, Mike@Waterboards; McCaffery, Emery@DOT; Sally_Brown@fws.gov; Harrison, Shay Lynn M@DOT; Macneil, Spencer D SPL; Scatolini, Susan@DOT; susan_wynn@fws.gov; Brown, Kanani@Coastal; mcooper@scc.ca.gov; Larry.Vinzant@dot.gov; tim_dillingham@wildlife.ca.gov; Bradford, Therese O. SPL; Bantilan-Smith, Meris SPL

Subject: RE: Temporary Impact/Mitigation Language + REMP WKGP Structure (UNCLASSIFIED)

Classification: UNCLASSIFIED Caveats: NONE

Sorry Sandra,

The Corps is also fine with the language regarding "Temporary Impact/Mitigation Language below...

-Stephanie

Stephanie J. Hall Senior Project Manager, Caltrans Liaison Transportation & Special Projects Branch USACE Los Angles District, Regulatory Division 915 Wilshire Blvd, Suite 930, Los Angeles, California 90017-3401 P: 213.452.3410 | M: 213.304.9682 | F: 213.452.4196

Assist us in better serving you! You are invited to complete our customer survey, located at the following link: http://corpsmapu.usace.army.mil/cm_apex/f?p=regulatory_survey

From: Buhr, Gabriel@Coastal [mailto:Gabriel.Buhr@coastal.ca.gov]

Sent: Tuesday, May 20, 2014 8:07 AM

To: Lavender-Martin, Sandra E@DOT; aevans@dudek.com; Kosup, Allan R@DOT; awinecki@dudek.com; Jacobo, Arturo@DOT; Bryant.Chesney@noaa.gov; April, Bruce@DOT; goldmann.elizabeth@epa.gov; Greer, Keith; Smith, Kim T@DOT; Porter, Mike@Waterboards; McCaffery, Emery@DOT; Sally_Brown@fws.gov; Harrison, Shay Lynn M@DOT; Spencer.D.Macneil@usace.army.mil; Stephanie.J.Hall@usace.army.mil; Scatolini, Susan@DOT; susan_wynn@fws.gov; Brown, Kanani@Coastal; mcooper@scc.ca.gov; Larry.Vinzant@dot.gov; tim_dillingham@wildlife.ca.gov; Therese.O.Bradford@usace.army.mil; Meris.Bantilan-Smith@usace.army.mil Subject: RE: Temporary Impact/Mitigation Language + REMP WKGP Structure

Both look fine to me Sandra.

Coastal Program Manager

On Tue, May 20, 2014 at 7:58 AM, Lavender-Martin, Sandra E@DOT <<u>sandra.lavender@dot.ca.gov</u>> wrote:

Good Morning Everyone!

Just following up to see if anyone has any comments on the attached REMP Structure and/or the Temporary Impact Language below. To date, I have only received comments from Tim. Please provide any comments by this Thursday COB, so that these items can be finalized.

Thank you,

Sandra

From: Lavender-Martin, Sandra E@DOT

Sent: Monday, April 28, 2014 3:44 PM

To: 'aevans@dudek.com'; 'allan_kosup@dot.ca.gov'; 'awinecki@dudek.com'; 'arturo_jacobo@dot.ca.gov'; 'Bryant.Chesney@noaa.gov'; 'bruce_april@dot.ca.gov'; 'goldmann.elizabeth@epa.gov'; 'gbuhr@coastal.ca.gov'; 'kgr@sandag.org'; 'kim_t_smith@dot.ca.gov'; 'mporter@waterboards.ca.gov'; 'emery_mccaffery@dot.ca.gov'; 'Sally_Brown@fws.gov'; 'shay_lynn_harrison@dot.ca.gov'; 'Spencer.D.Macneil@usace.army.mil'; 'Stephanie.J.Hall@usace.army.mil'; 'susan_scatolini@dot.ca.gov'; 'susan_wynn@fws.gov'; 'kbrown@coastal.ca.gov'; 'mcooper@scc.ca.gov'; 'Larry.Vinzant@dot.gov'; 'tim_dillingham@wildlife.ca.gov'; 'Therese.O.Bradford@usace.army.mil'; 'Meris.Bantilan-Smith@usace.army.mil' **Subject:** Temporary Impact/Mitigation Language + REMP WKGP Structure

•

Hello Everyone,

The proposed temporary impact/mitigation language for the REMP is below. The poposed structure for the REMP Working Group has been revised to include all edits received to date. Please review both and provide comments by Tuesday, May 6th.

Temporary Impact/Mitigation Language

Implementation of Resource Mitigation and Enhancement Program (REMP) as outlined in the NCC Public Works Plan will result in some temporary impacts to low quality wetlands, such as disturbed wetlands and non-tidal salt marsh, to re-establish, restore, and enhance high quality tidal and freshwater wetlands. Any potential impacts resulting from the re-establishment, restoration, and enhancement will be identified in the site specific HMMPs. No additional mitigation would be required for these temporary impacts as long as there is a net benefit or a significant increase in quality and function of the re-established/restored/enhanced wetlands. If any portion of the mitigation site fails to meet its success criteria under the HMMP, no credits would be released and mitigation for temporary impacts maybe required at that time.

Thank you, Sandra

Sandra Lavender-Martín

Associate Environmental Planner Department of Transportation - District 11 Environmental Stewardship/Ecological Studies Branch P: (619) 688-0115

CITY OF SAN DIEGO EL CAMINO REAL ROAD/BRIDGE PROJECT AGENCY COORDINATION MEETING SUMMARY APRIL 4, 2005

AGENCY REP	AGENCY REPRESENTATIVES AND INTERESTED PARTIES (in alphabetical order)						
NAME	AFFILIATION	PRESENT?	PHONE	E-MAIL			
Shawna	JPA	Yes	858-674-2275	shawna@sdrp.org			
Anderson			x13				
Norm Arndt	Rick Engineering	No	619-291-0707	ncarndt@rickengineering.com			
Eliana Barreiros	City of San Diego	Yes	619-446-5321	ebarreiros@sandiego.gov			
Edgar Camerino	Rick Engineering	No	619-291-0707	ecamerino@rickengineering.com			
Susan Carter	JPA	No	858-674-2275 x11	susan@sdrp.org			
Lisa Cathcart- Randall	FHWA	No		Lisa.cathcart-randall@fhwa.dot.gov			
Dr. Howard Chang	Chang Consultants	No		changh@mail.sdsu.edu			
Bryant Chesney	NMFS	No		Bryant.chesney@noaa.gov			
Lori Cosio	City of San Diego	Yes	619-533-3453	lcosio@sandiego.gov			
Susan DeSaddi	Corps of Engineers	No	213-452-3412	Susan.a.desaddi@usace.army.mil			
John DiGregoria	USFWS	Yes	760-431-9440	John Digregoria@fws.gov			
Tim Dillingham	CDFG	No	858-467-4204	tdilling@dfg.ca.gov			
Elizabeth Goldman	EPA	No		Goldmann.elizabeth@epa.gov			
Stephanie Hall	Corps of Engineers	No	213-452-3410	shall@spl.usace.army.mil			
Bob Hoffman	NMFS	No		Bob.hoffman@noaa.gov			
Katherine Hon	Hon Consulting	Yes	619-294-8990	khon@honconsultinginc.com			
Donna Jones	Sheppard, Mullin, Richter & Hampton, Attorneys	No	619-338-6500	djones@sheppardmullin.com			
Chris Knopp	ProjectDesign Consultants	No	619-881-3390	chrisk@projectdesign.com			
Dennis Landaal	Kimley-Horn	No	619-744-0110	Dennis.landaal@kimley-horn.com			
Richard Leja	City of San Diego	Yes	619-533-3764	rleja@sandiego.gov			
Ellen Lirley	Coastal Commission	Yes	619-767-2370	elirley@coastal.ca.gov			
Libby Lucas	CDFG	Yes	858-467-4230	elucas@dfg.ca.gov			
Chris Nordby	Tierra Environmental Services	Yes	858-578-9064	<u>Tierraenv@aol.com</u>			
Abi Palaseyed	City of San Diego	Yes	619-533-3756	apalaseyed@sandiego.gov			
Cesar Perez	FHWA	No					
Mike Porter	San Diego Regional Water Quality Control Board	No	858-467-2726	portm@rb9.swrcb.ca.gov			

AGENCY REPRESENTATIVES AND INTERESTED PARTIES (in alphabetical order)

NAME	AFFILIATION	PRESENT?	PHONE	E-MAIL
Nick Psyhogios	ProjectDesign	No	619-881-2549	nicholasp@projectdesign.com
	Consultants			
Kai Ramer	Rick Engineering	No	619-291-0707	ker@rickeng.com
Kerry Santoro	City of San Diego	No	619-533-3749	ksantoro@sandiego.gov
Sherilyn Sarb	Coastal	No	619-767-2370	ssarb@coastal.ca.gov
	Commission			
Steve Schroeter	Biologist,	No	760-438-5953	schroete@lifesci.ucsb.edu
	UCSB/CCC			
Allison	City of San Diego	Yes	446-5379	araap@sandiego.gov
Sherwood				
Tamara Spear	CDFG	Yes	858-467-4223	tspear@dfg.ca.gov
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Stoermer				
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DISCUSSION SUMMARY

- 1. The objective of the meeting was to follow up on questions and concerns communicated by the permitting agencies on the City's preferred mitigation site, which is the former Boudreau site purchased by the JPA (herein referred to as the "JPA site").
- 2. Clarifications to the February 28, 2005 agency coordination meeting notes and additional comments were received from CDFG and the USFWS, as summarized below.

Libby Lucas with CDFG stated in a March 2, 2005 e-mail that CDFG generally agrees with the proposed mitigation ratios. However, she requested clarification on the definition of "restoration," stating that for CDFG "to consider whether restoration alone or a restoration/creation mix would meet the no-net loss requirement, we would need to know the details of the proposal." She also noted that if the term "coastal wetlands" includes the clapper rail habitat to the east of the bridge, "the proposed 4:1 creation for the loss of clapper rail habitat will be acceptable to DFG, as will be the 1:1 creation plus 3:1 enhancement (i.e., removal for non-native invasive species from the riparian area)."

In a subsequent letter to the City e-mailed on March 24, 2005, CDFG made the following additional comment on the February 28, 2005 meeting notes: "The minutes correctly reflect that CDFG indicated that the proposed 4:1 mitigation is higher that we usually see for the loss of coastal wetlands. What I meant to say is that 4:1 <u>creation</u> is higher than we usually see. City of San Diego requires 4:1 for coastal wetlands, but does not specify that it all be creation. As we have said in a previous e-mail, we agree with the 4:1 creation for the loss of habitat that supports the clapper rail." This letter also posed additional questions regarding the Polo Club fields as a mitigation site. These questions were the focus of the April 4, 2005 meeting.

John DiGregoria with USFWS stated the following in a March 23, 2005 e-mail: "A couple of notes from your minutes. The Service stated that there will likely be no direct injury or kill from construction equipment. However, the permanent removal of occupied habitat will constitute "take" from harm (loss of occupied habitat) and we will need to go through formal consultation with the project. The Service also supports the CDFG position regarding the Polo Fields and any outstanding issues regarding the Polo Fields needs to be closed before we move forward with this project."

- 3. The feasibility of the alternative alignments that affect the western edge of the Polo Club Fields leasehold was discussed. The alternatives for the road are feasible because the lease specifically allows the City to build a road and to have other utility easements over and across the property. However, taking land for mitigation is not specifically allowed in the lease, so this action would have to be negotiated separately. The lease is for 26 years. It started in 1986 and runs to the end of 2012. The lease does not include language regarding implementing mitigation on the property referenced in the 1981 Fairbanks Country Club EIR prepared for Watt Industries, the property owner at the time. A Corporation Grant Deed transferred the property to the City on October 24, 1983. The City noted that mitigation never being implemented on the Polo Club fields for the 1981 project is a code enforcement issue, and the City will investigate this issue. It was agreed by CDFG that mitigation for El Camino Real and mitigation for the 1981 Fairbanks Country Club project are two different issues. CDFG also concurred that if the road is in the lease, then the road alignments affecting the property are feasible.
- 4. Potential actions by Polo Club if part of the property were taken for the road and for mitigation were discussed. Caltrans emphasized that it is speculation to predict any actions on the lessee's part, and the environmental document will not speculate. City Real Estate Assets stated that with only 7 years left on the lease, it is not likely that the lessee would go to the expense of obtaining the private property to the north in order to continue operations.
- 5. Demolition of the existing bridge was discussed. CDFG suggested leaving the pier walls of the existing bridge in place if the Eastern Alignment Alternative, with the completely separate new bridge, is selected. The hydraulic effects of the existing bridge and other components of the river system in this location, including the rip rap blanket and existing bridge abutments, must be analyzed. USFWS noted the rip rap blanket has helped establish the emergent marsh, which is attractive to the clapper rail. The hydraulic

analysis must determine if steepening the abutments as proposed would be detrimental to the hydraulic system that supports the clapper rail. The project description must include how and when the existing bridge would be demolished. CDFG noted that we must balance river functionality with the clapper rail requirements.

6. The biological suitability of the JPA site and the Polo Club site for clapper rail mitigation was discussed. The project biologist read the following from a government annotated bibliography about clapper rail written by Dick Zembal, former USFWS expert:

"The light-footed clapper rail is non-migratory. Once established on a territory, the birds stay throughout the year and from year to year.

Local wandering, however, has been documented, with sightings of rails in winter, sometimes far inland. Whittier Narrows, 32 km from the coast, and Walnut Canyon Reservoir (Nohl Ranch Lake), 23 km from the coast, are the farthest inland sites documented thus far. The most probable explanation for winter dispersal is that young birds must seek their own territories, once the family unit breaks up at the end of breeding season."

- 7. Coastal Commission policy regarding mitigation for impacts in the Coastal Zone was discussed. The City's Local Coastal Program requires impacts in the Coastal Zone to be mitigated in the Coastal Zone. However, the Coastal Commission noted that state coastal requirements would be the review standard in the project area, not the City's Local Coastal Program. The Coastal Commission said that if there is biological benefit to mitigating outside of the Coastal Zone, they would consider such a plan.
- 8. Potential impacts to the JPA trail that is currently on the north bank of the river were discussed. If mitigation were on the Polo Club site, allowance for at least a 100-foot buffer would have to be made in addition to the width of the mitigation area. JPA noted moving the trail as far north as the property line between the private property and the Polo Club field property could be a problem for their Coast to Crest trail alignment. However, they do not have a set trail alignment east of the bridge, because they must still address how to go through the Morgan Run area.
- 9. Potential legal issues associated with implementing mitigation on the Polo Club site were discussed. Caltrans noted that they generally cannot condemn for mitigation land, and they must prove necessity. In this case, since the JPA site is also considered feasible, it would be difficult to prove necessity for using the Polo Club site.
- 10. USFWS and CDFG concluded that neither agency has the authority to require the City to select a particular mitigation site if several are adequate. If it can be demonstrated that emergent marsh can be established on the JPA site, then that site is acceptable for mitigation for El Camino Real Road/Bridge Project. Hydrologic feasibility is related to the depth of groundwater on the site, and the ability to connect to the river without affecting river hydraulics.

11. The City will pursue having borings drilled on the JPA site to determine the existing groundwater level. The City will have Dr. Chang develop and analyze a river connection. The City will also have Dr. Chang evaluate the hydraulic conditions that would occur if the existing bridge were left in place and a new bridge built to the east. Results of the feasibility and hydraulics analysis will be reported in future e-mail correspondence.

NOTE: These minutes are the preparer's understanding of the items discussed at the meeting. If discrepancies are noted, please contact the preparer within five working days of receipt.

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Attendees and Interested Parties
April 26, 2005

CITY OF SAN DIEGO EL CAMINO REAL ROAD/BRIDGE PROJECT AGENCY COORDINATION MEETING SUMMARY MARCH 14, 2007 DISCUSSION SUMMARY

A. FAIRBANKS RANCH GOLF COURSE

- A.1 A new Streambed Alteration Agreement was not required by CDFG for the golf course expansion in 2003. Ponds in the golf course covering approximately 12 acres were agreed upon as mitigation that addressed the 109-acre obligation that was originally shown as being north of the river at Polo Field. CDFG does not believe the ponds that were built are consistent with the agreed-upon configuration, as the ponds are set back from the river. However, it is CDFG's responsibility to enforce this issue.
- A.2 Apparently, 13 acres of mitigation were exchanged for revegetation of an area upstream designated as "Area 3." Agency documentation is not clear on when or how this occurred; CDFG is exploring this issue further.
- A.3 CDFG and USFWS are concerned about temporal loss because of the delay between impacts that occurred in 1981 and the mitigation that was constructed in 2003. However, it is not clear if temporal loss was a consideration in the agreements made with CDFG regarding the project in the 1980's. USFWS did not assume jurisdiction at that time.
- A.4 There is also a maintenance requirement for the golf course to remove invasives in the river from El Camino Real Bridge to 3,000 feet upstream for 5 years. This activity may be occurring at the wrong time of year.

B EL CAMINO REAL MITIGATION SITE

- B.1 CDFG's primary concerns are that the proposed mitigation concept is a contrived and artificial wetlands system. They want to explore more in-river riparian creation and enhancement. They want to focus on optimizing the natural system along the banks of the river and removal of invasives. They are concerned about the possibility of the clapper rail not utilizing the proposed mitigation site. However, it was recognized that there is potential benefit of having an off-system "refuge" for the clapper rail because of the potential for the population to be displaced or decimated by a big flood event.
- B.2 Ideas from CDFG for alternative mitigation concepts that could be added to the EIR include the following:
 - Long-term invasive species removal using appropriate techniques
 - Riparian creation along the north bank of the Polo Field
 - Laying back upland slopes and creating brackish to freshwater marsh in other areas further upstream
 - The above combined with a downscaled version of the proposed mitigation concept
- B.3 In response to specific questions, USFWS noted they would not accept out-of-kind mitigation for brackish marsh impacts. USFWS also noted they would identify bridge

shading impacts as permanent, unless there was a special study clearly demonstrating that a bridge would be high enough to allow sufficient light for habitat to grow.

- B.4 According to Caltrans, FHWA would not participate in a higher cost mitigation program if a lower-cost solution exists.
- B.5 Caltrans noted there may be some federal participation allowed in a long-term maintenance program.
- B.6 Mitigation ratios would be lower if the mitigation were in place before the impacts occurred. The City would consider ways to construct the mitigation before starting the road and bridge construction.

C. EIR COMMENTS

- C.1 The City is confident the existing bridge would not cause hydraulic problems for the new bridge as proposed for the Eastern Alignment. However, based on comments made at meetings and the letter the JPA wrote on the Draft EIR, the JPA now does not favor taking responsibility for the existing bridge if it were retained as part of the Eastern Alignment. Five other comment letters on the EIR also noted the existing bridge should not be retained. Therefore, the City will propose an option for the "Modified Eastern Alignment" to demolish the existing bridge when construction is completed.
- C.2 The hydraulic experts agreed that the existing bridge does not affect the low flows in the river. The river flows bank to bank from the 10-year flood. Higher flood events overtop the banks.
- C.3 Additional text should be added to the discussion of potential clapper rail impacts in the EIR. The possible impacts should be identified, considering the bird is in the river year-round. Methods to minimize impacts should be listed, for example, noise attenuation measures, and exclusion fencing.

ACTION ITEMS

- Beth will arrange a separate meeting with the agencies and Fairbanks Ranch CC representatives to discuss their issues.
- Consultants will develop mitigation alternatives to show to the agencies at a follow-up El Camino Real meeting.
- Tierra will draft text regarding potential clapper rail impacts for agency review.
- City will arrange a follow-up meeting with the agencies.

Appendix D

Bridge Construction Methodology & Associated Noise Reduction Measures, and Biological & Hydraulic Impacts

El Camino Real Road/Bridge Widening

Bridge Construction Methodology & Associated Noise Reduction Measures, and Biological & Hydraulic Impacts



Nordby Biological Consulting

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PROJECT BACKGROUND

The City of San Diego (City) proposes to modify the segment of El Camino Real between Via de la Valle and San Dieguito Road in order to improve the structural integrity of the vehicular bridge over the San Dieguito River, alleviate problems associated with high flood events, improve pedestrian and vehicular access to nearby coastal and recreational resources, relieve traffic congestion, and improve consistency with the adopted land use plan for the project area.

The project area is in the northwestern part of the City of San Diego. The City of Del Mar is to the west, the Fairbanks Ranch Country Club development within the City of San Diego is to the east, and County of San Diego lands are to the north. The road being modified is El Camino Real from Via de la Valle on the north to San Dieguito Road on the south. This portion of El Camino Real, classified as a 2-lane collector, is approximately 2,400 feet long, 23 feet wide, has one travel lane in each direction, and has no shoulders, bike lanes, or pedestrian walkways. The road segment includes a bridge over the San Dieguito River that is 340 feet long and 27 feet wide. The San Dieguito River crosses under El Camino Real approximately 1,500 feet south of Via de la Valle.

In this location, El Camino Real would be inundated during a 100-year flood at several low points north of the river. Although the bridge surface would not be inundated, the 100-year flood level would rise to the bottom of the bridge deck, so there is not adequate room to allow debris to pass under the bridge. Also, the bridge is not structurally adequate for the local seismic conditions, because the piles are relatively shallow and buried in sediments that could fail in an earthquake due to liquefaction. In addition, this segment of El Camino Real is subject to severe congestion during peak travel times. The segment of El Camino Real included in the project currently operates at Level of Service (LOS) F at peak hours, reflecting congested traffic conditions. The proposed improvements include raising and widening El Camino Real roadway and replacing the bridge with a structure that is higher, wider, and has deeper piles.

Modifications to Via de la Valle from El Camino Real on the west to El Camino Real North on the east are also part of this project. This segment of Via de la Valle also operates at Level of Service (LOS) F. Most of this segment would need to be widened for appropriate transitions from widened El Camino Real.

Multiple build alternatives have been studied for this project, but for the purpose of this report, the focus will be on the Eastern Alignment Alternative.

EASTERN ALIGNMENT

Full widened roadway cross section with an alignment shifted east to allow independent construction of the new bridge, minimize impacts to developed properties along the western side of El Camino Real (Horsepark and Mary's Tack and Feed), and reduce impacts to wetlands in the drainage ditch parallel to the eastern edge of El Camino Real. The alignment for this alternative would be shifted eastward to where the toe of the new road's western embankment would tie in along the existing Polo Club fence. For this alternative, the roadway would be raised above the 100-year flood level on embankment.

PURPOSE

The purpose of this report is to discuss the following:

- Construction methodologies of the proposed bridge;
- Noise Reduction Measures during construction;
- Biological Impacts due to bridge construction; and
- Hydraulic Impacts during construction.

CONSTRUCTION METHODOLOGY

Temporary Berm Option

<u>Overview</u>

The option for utilizing a berm for construction the El Camino Real Bridge replacement is for a

Contractor to build a temporary berm that would provide a working pad area approximately 30 feet east of the new east edge of deck to approximately 30 feet west of the new west edge of deck of the bridge. The total width of the berm would vary based on the height of the fill placed. It would extend from the north bank to the south bank of the San Dieguito River, with openings (culverts or bridge crossings) for low flow channels as required for hydraulics. Using the berm and the embankment, the Contractor will construct the pile, columns, place temporary falsework, and for the construction of the superstructure of the bridge. Upon completion of the bridge, the Contractor will deconstruct the falsework, and remove the berm material from the river.

Once the bridge construction is done, the berm material will remobilize the same materials to the west side of the new bridge to construct a berm to be used for the demolition of the existing structure. This berm will also need to provide a 30' working pad on each side of the existing bridge. This document is intended to provide an explanation of construction, and impacts, of the steps required to:

- Construct and deconstruct a berm
- Construct and deconstruct falsework
- (Includes skeletal description of building columns and the bridge superstructure)
- Demolish the existing bridge

Constructing the berm

- Contractor will mobilize heavy equipment to include a large dump trucks, bulldozers, front-end loaders, and excavators. It is expected that multiple quantities of each piece of equipment will be used.
- Contractor will mobilize substantial amounts of dirt, and large 1-2 ton angular rock near berm location with large dump trucks. Depending on the source and availability of material, the Contractor may be able to run a continuous import operation without a temporary staging area near the berm location.

- Prior to the operation beginning, the Contractor will identify the area within the River that will be impacted by the berm and place an impermeable barrier along the perimeter to avoid an increase in turbidity while the berm is being constructed. This barrier may be in the form of floating tubes with plastic sheeting hanging down and weighted at the bottom to prevent significant tidal water from passing through the impacted area.
- Contractor will utilize a bull dozer to grade the area along embankment where the berm will be located.
- Contractor will place geotextile, plastic sheeting or other impermeable material along the footprint of the berm starting at the embankment, above the high water mark, and working outwards into the river, perpendicular to the shoreline.
- The Contractor will start placing the dirt at the shoreline on top of the impermeable material and work outwards into the river. Along the perimeter of the berm the Contractor will place 1-2 ton rock as a protective barrier for the soil material.
- An operation using a dump truck, dozer and excavator will move the soil and 1-2 ton rock outwards from the shoreline onto the impermeable material.
- As the berm is constructed, the excavator will move out onto berm. The dozer or frontend loader will move material onto the constructed berm to allow the excavator to pick and place material.
- The impermeable material will be incrementally placed ahead of soil and rock-placing operation.
- The Contractor will establish openings in the berm as required to allow the river to flow. Openings may be constructed of multiple corrugated metal pipes (CMP) placed perpendicular to the alignment of the berm. Annular space between CMPs will be filled with dirt and plates will likely be placed over the CMPs. An alternative is for the Contractor to build a small bridge made of steel stringers and steel plates or timber decking material to span the opening(s).
- The width of the berm may vary to accommodate locations where outriggers for Contractor's cranes or concrete pumps may be placed.

Notes:

- The Contractor can complete construction of each abutment for the permanent structure concurrently while constructing the temporary berm.
- Upon completion of the temporary berm, the Contractor can begin construction of the Cast-In-Drilled Hole (CIDH) piles, the columns for the permanent structure, and the temporary falsework for the bridge.

Constructing large CIDH piles for columns

- Upon completion of the berm, the CIDH piles can be placed. Note: With the allowance of the placement of a significant amount of fill material in the River, the Contractor should not need to create cofferdams in order to construct the CIDH piles for the columns. Other

options may be available to the Contractor with the placement of the large temporary berm, such as enlarging the berm around the pile locations or placing a large diameter casing at each column location, essentially creating a temporary cofferdam.

- Piles will be constructed using a large drill rig, large crane, front-end loader, Baker tanks for drilling fluid storage, dump trucks for spoil removal, and other typical construction equipment. It is expected that 3 WMBD Alt 2C Large Berms the drilling will be done under drilling fluid, or slurry, or with the use of a full length temporary casing, based on the water level expected at the side.
- It is expected that a steel casing will be used to stabilize the top of the drilled shaft at each location, and although typically called a temporary casing, it is typically left in place. This casing could be as deep as 30' depending on the soil parameters found.
- Concurrently with constructing the berm, ironworkers will be building the steel cage for the CIDH piles and columns. Depending on availability of space, the pile and column cages may be built on the berm. If space is not available, the cages will be constructed in the Contractor's staging area near the embankment. In either scenario, reinforcing steel will be mobilized to the site by means of semi-trailers and off-loaded with the use of a large crane.
- The Contractor will construct the CIDH pile foundation by drilling through the berm, placing a casing and/or drilling slurry to maintain the hole, placing the pre-fabricated steel cage into the hole and pumping the required concrete mix into the drilled shaft while holding the steel cage and casing in place with other large cranes. As the level of the concrete rises, the casing used to maintain the drilled hole will be raised simultaneously to avoid excessive head pressure.
- This operation will be repeated to construct the required number of columns.
- Upon completion of each pile, the Contractor can begin construction on the columns for the bridge.

Constructing temporary falsework from the berm

Note: There is a possibility that no piles would be needed if the berm was stabilized during

construction and can support the load from the falsework on spread footings. This would be up to the contractor during their falsework design process. This could possibly eliminate the need for any driven piles. For the purposes of this study it will be assumed that the Contractor cannot stabilize the foundation for the falsework and that piles are required. Falsework on a spread footing foundation is a best case scenario and falsework on piles is worst case.

- At the face of each abutment the Contractor will place a short falsework bent, likely constructed of wooden corbels, a 12X12 sill beam and 12X12 posts, and a 12X12 cap beam.
- Starting on the north end of the structure the Contractor will drive temporary steel piles through the berm to create a foundation for a falsework bent. Falsework piles will likely

be 20" diameter steel shell piles. This will be accomplished by staging the pile driving rig on the berm or on the embankment near the abutment. (Subsequent piles will be driven with the pile rig on the berm.)

- A steel pile cap will be placed on top of the driven piles, by use of a crane, and secured by welding or other mechanical connection.
- Steel or wooden falsework posts will be placed on top of the steel pile cap, by use of a crane, and secured by welding or other mechanical connection.
- A steel cap beam will be placed on top of the falsework posts, by use of a crane, and secured by welding and/or mechanical connection. **This completes one falsework bent.**

Note: The use of one large berm creates a working platform for constructing falsework and allows for ease of access for laborers.

- Alternatively, the Contractor may elect to pre-fabricate the falsework bents in the staging yard, mobilize them on site with semi-trailers and put them in place by use of a crane staged on the berm.

Because stability of falsework bents is critical, it is likely that once the Contractor completes two adjacent falsework bents the Contractor will place multiple steel stringers across the span, connect them to each bent and create a frame.

- This same sequence is repeated until all falsework bents and stringers are constructed. Access to the connection of stringer and cap beam can be obtained from the berm by use of a basket or cherry picker.
- There are a number of concurrent operations that can occur while the falsework bents are being constructed and stringers are placed. The ability of a Contractor to work concurrent operations is dependent on the availability of equipment, labor and materials.
- Once steel stringers are placed the Contractor will build a platform of 4x4 timbers and plywood on top of the stringers. The soffit of the bridge will be poured on this platform.
- Placement of stringers and remaining falsework items, and steel and concrete for the stem, soffit and deck construction will occur from the berm. This will require semi-trailers to access the embankment and deliver materials to the berm by either driving onto the berm or staging on the embankment and being off-loaded by a large crane.

The number of piles (if used) in a falsework bent and the number of falsework spans is to be determined by the Contractor. However an estimate of the typical spacing of piles is as follows: 1 falsework bent every 40' max, with piles spaced at 5' on center measured transversely to the bridge.

Constructing superstructure

- Once falsework is complete, construction of the superstructure of the bridge can commence.
- Delivery of forms, reinforcement steel and concrete will be from the berm and from the abutment locations.

- Concrete pumps will be staged at the abutments and on the berm. Concrete trucks will deliver concrete to the pump on the berm by accessing the berm.

Deconstructing the falsework

- Upon completion of bridge construction the Contractor will deconstruct the falsework in an opposite manner in which it was constructed.
- The falsework design and construction will include jacks, wedges, and pulleys that allow the Contractor to separate the platform and steel stringers from the bottom of the soffit after the bridge is prestressed.

Note: The use of the berm creates a working platform for removing falsework and allows for ease of access for laborers and welders, as well as demobilization of materials.

- Combining access from on top of the newly constructed bridge and the berm, the Contractor will remove the 4x4 platform and stringers.
- Working on the berm the Contractor will deconstruct each falsework bent and move material to the embankment.
- Removal of the falsework piles (if used) will be constrained vertically due to the construction of the new bridge. Permit requirements may dictate a number of options, to include:
 - 1) The contractor may leave piles in place but cut the top of the piles to the low water elevation.
 - 2) The Contractor must cut off the top of the piles down to 2 feet below the original riverbed. This may require the Contractor to dewater and/or divert the river away from the area where the piles will be cut, dig around each pile to 2 feet below riverbed and cut piles.
 - 3) The Contractor must remove all piles full length. This will be challenging for Contractors and force them to mobilize special equipment under the structure, raise each pile a certain length and cut off the portion above water. This operation will likely be the most expensive and time consuming of the options listed.
- Once all falsework material is removed it will be placed in the staging area in preparation for the next phase of construction.

Demolishing the existing bridge

- The construction of a temporary berm allows for ease of demolition of the existing structure.
- The Contractor will mobilize crews onto the temporary berm on the side of the existing bridge in order to facilitate demolition and removal of the concrete deck, beams and pier walls. It is likely that the combined access from the berm and the deck of the existing structure will be utilized to remove the deck and beams.

- With the berm acting as a barrier and preventing demolished concrete, steel and debris from falling into the San Dieguito River, the Contractor can mobilize demolition equipment onto the berm, demolish each pier and collect the material on the berm.
- It is proposed that the contractor would remove existing pier walls 2 feet below the original riverbed, leaving footings and piles below in place. This will be the least impactful and more feasible scenario.
- Demolished concrete, steel and other material will be mobilized off site by accessing the berm.
- Contractor will reestablish the existing conditions at each pier location and demobilize from the site. Repairs to the protective rock mat may be needed where the pier walls were removed.

Deconstructing the berm

- Upon completion of bridge construction the Contractor will deconstruct the berm in an opposite manner in which it was constructed.
- An operation of a dump truck, dozer and excavator will demobilize the soil, 1-2 ton rock, and the CMPs (or bridge) from the end of the berm towards the shoreline.
- The excavator will remove the material and place it into the bed of large dump trucks.
- A succession of large trucks will travel along the constructed berm and move the material off-site. Multiple trucks will be required to maintain a continuous operation.
- As the impermeable material is exposed it will be lifted out of the water and rolled up onto the end of the berm.
- This operation will continue until the berm is deconstructed to the embankment.
- Upon demobilization of the berm, the Contractor will deconstruct the turbidity barrier.
- The Contractor will restore the embankment area in accordance with permit requirements.

Trestle Construction Option

General:

- Typical width 30'
- Side trestle needed at each pier location. Assume 3 bents at 25' spacing, overall dimension = width of the structure x 50 ft.
- Extend trestle full length across San Dieguito River
- Temporary piles will be driven for trestles using impact and vibratory hammers.
- Temporary piles for trestles can be removed using a vibratory hammer.

Construction process:

- Grade slope for crane access at abutment, set abutment foundation for trestle.
- Drive piles at 35' away from abutment. It is assumed a combination of vibratory hammer and impact hammer will be used to drive the piles. Spacing of piles will be roughly 4' to 5'. Approximately 6 or 7 piles will be needed at each bent. Workers will be required to access the bent location by boat or other means in the riverbed to set up driving template, to cut piles to height, to set cap beam, set beams, etc.
- Set transverse cap beam on top of row of piles. Connect to piles.
- Set longitudinal beams from abutment to first bent. 9 or 10 W24x117 or similar sized beams will likely be used in each span. Place lateral bracing for beams.
- Place crane pads or timber decking on beams.
- Drive crane and pile driving hammer and leads to the first bent.
- Repeat #2 to #6 above all the way across the river.

<u>At Piers:</u>

- From trestle, drive 3 rows of piles 25 feet apart, at similar spacing transversely, to the opposite side of the bridge. Pile spacing will be controlled by CIDH pile equipment loads.
- Set cap beam on top of row of piles. Connect to piles.
- Set beams between bents. Place lateral bracing for beams.
- Place crane pads or timber decking on beams.
- Use this 50' wide area to access the pier for drilling CIDH piles, constructing columns, etc.

Bridge Falsework Construction:

Falsework will be used to construct the new bridge superstructure. See El Camino Real Berm Construction Description document for detailed description of the bridge falsework and bridge construction. When no berm is used, the falsework will need to be placed on driven piles.

Demolition of existing structure:

Demolition of the existing structure could be done using a berm or trestle. This document will discuss the use of a trestle. See El Camino Real Berm Construction Description document for description of the use of a berm to remove the existing structure.

Demolition of existing structure using a trestle:

- A temporary trestle will be required to provide access for demolition of existing bridge.
- Trestle for demolition would be as complex as trestle built to construct the bridge, however it won't need to be as wide.

- Use of a trestle for demolition will require a netting system (or equivalent) supported from the trestle and existing piers to prevent debris from dropping into the San Diego River during demolition.
- Upon completion of the demolition of the existing superstructure, an additional trestle will be required to provide access to drive sheet piles around existing piers to facilitate partial removal of the substructure below grade.

Other Considerations during construction:

- Temporary turbidity barrier will need to be installed around the trestle prior to the start of pile driving. At least one opening on each side should be provided at main flow area to allow main river flow easy flow up and down stream.
- Elevation of the bottom of the trestle should be set above a significant flood elevation, to prevent it from being impacted in case of flood. Hydraulic analysis will be necessary to determine this elevation.
- Falsework piles will be driven from the temporary trestle.
- Pile spacing and span lengths will be controlled by the largest load on the trestle, likely the CIDH pile drill and the crane used when setting the rebar cage for the CIDH piles.

Removal of trestle:

- Remove decking from beams.
- Remove beams with crane sitting on adjacent span.
- Remove cap beams. Access to trestle bents by boat or other means in the riverbed will be needed for workers to cut welds, rig crane, etc.
- Using vibratory hammer, remove piles with crane sitting on adjacent span.
- Remove turbidity barrier by boat or other means in the riverbed.

Other Considerations:

- Removal of the piles will create a swelling of soil around the pile as it is pulled out that could be on the order of 2' to 4' high, depending on the cohesion properties of the soil. There will be a hole at the pile location as well. Depending on the type of material, it could collapse and fill itself in, or remain open for a long period of time.
- Falsework piles will be needed for this option for certain. For the berm options, it will depend on the capacity of the material placed in the channel and the underlying material. It is possible that falsework piles will be needed for the berm options as well.
- Removal of the falsework piles is limited in the trestle option by the elevation of the trestle because the equipment must work from the trestle. In the berm options, the removal is still limited, but possibly less so if the berm elevation can be lower than the elevation of the trestle. This could be done during the berm removal to allow greater headroom for pile removal.

NOISE REDUCTION MEASURES

A combination of the following methods may be used to reduce noise levels associated with construction:

- Timing and duration of operations was adjusted so that the required average hourly noise levels could be met. Noisy operations were only done intermittently during any given hour.
- All backup alarms were disconnected on manlifts and large equipment, and spotters were used around this equipment for safety purposes.
- Noise dampening panels were used to block the sound from the sensitive habitat areas. Sometimes this was just a sheet of plywood. Other times during operations like the bridge demo, these panels were large (8'x16') and insulated with noise dampening insulation. Multiple panels were used during many operations. These were used around stationary equipment such as light plants, locations used for sawing, and were supported on a forklift and moved around for mobile operations such as the bridge demolition.
- Noise monitoring was done daily during the breeding season and nightly during potentially noisy operations to monitor the noise levels and mitigation measures were adjusted as necessary during the operations.
- Typically propped into place around the equipment, leaned up against it. They put some up on the handrail around the bentcaps, and occasionally tied to the sides of the manlifts they were working from. The large ones were hung from a forklift.

PROPOSED METHODS TO AVOID AND MINIMIZE IMPACTS TO BIOLOGICAL RESOURCES

General

- Staging and equipment storage areas, and equipment maintenance will be located outside of the river corridor;
- A qualified biologist will train construction crews (including utility personnel) to avoid unnecessary impacts to the biological resources by briefing them on resource protection measures;
- Prior to the start of construction, a qualified project biologist will supervise installation of orange construction fencing or equivalent along the limits of disturbance within and surrounding sensitive habitats as shown on the approved construction plans. Temporary fencing will be removed after project completion.
- The project biologist will monitor all phases of construction to minimize impacts on sensitive species, check that wildlife is not entrapped, verify that the boundary fencing is maintained in good condition, and ensure that construction activities do not encroach into biologically sensitive areas beyond the approved limits of construction.

- A wildlife corridor will be maintained during all construction within the river corridor during non-breeding season. The wildlife corridor will consist of a spanned low flow channel of the river, approximately 40 feet wide. Orange construction fencing will be installed parallel to the low flow channel to discourage wildlife from accessing the construction areas approved in the plans.
- Construction lighting in upland areas will be the lowest illumination necessary, and directed away, or shielded from the river corridor
- The project site will be kept as clean of debris as possible to avoid attracting predators of sensitive wildlife. All food-related trash items will be enclosed in sealed containers and regularly removed from the site.
- Pets of project personnel will not be allowed on the project site.
- Disposal or temporary placement of excess fill, brush, or other debris will not be allowed in Waters of the U.S. or within their banks.

Light-footed Clapper Rail. Light-footed clapper rails have been documented both east and west of the existing ECR bridge. In order to avoid impacts to this species the following measures are proposed:

- No construction will occur within the river corridor during the clapper rail breeding season (February 15 September 15);
- Noise from construction activities outside of the river corridor will not exceed 60dBA (1-hour) at the river corridor (or ambient, whichever is greater) during the light-footed clapper rail breeding season. If the noise limit is exceeded, the noise will be reduced by using temporary noise measures such as plywood barriers, equipment mufflers, or sound blankets;
- Outside of the breeding season, construction in the river corridor will be limited to daylight hours. No temporary lighting will be installed for construction at night;
- Prior to beginning construction at the end of the clapper rail breeding season (September 15) all vegetation within the approved limits of disturbance will be removed to eliminate the potential for rails to seek vegetative cover. The project biologist will monitor vegetation removal activities to avoid impacts to rails during this process. Should any rails be detected in the limits of disturbance, vegetation removal activities will be halted temporarily while the project biologists flushes the rail(s) from the area to be cleared into existing emergent vegetation west of east of the bridge;
- A wildlife corridor will be maintained during all construction within the river corridor during non-breeding season to allow east/west movement by rails. The wildlife corridor will consist of a spanned low flow channel of the river, approximately 40 feet wide. Orange construction fencing will be installed parallel to the low flow channel to discourage clapper rails from accessing the construction areas approved in the plans.

Least Bell's Vireo. Least Bell's vireo have been documented approximately 100- 300 feet west of the CER bridge. Measures to minimize impacts to this species include:

- No construction will occur within the river corridor during the combined breeding seasons of the light-footed clapper rail and least Bell's vireo (February 15 – September 15);
- Noise from construction activities outside of the river corridor will not exceed 60dBA (1 hour) at the river corridor (or ambient, whichever is greater) during the combined breeding seasons of the light-footed clapper rail and least Bell's vireo If the noise limit is exceeded, the noise will be reduced by using temporary noise measures such as plywood barriers, equipment mufflers, or sound blankets;

HYDRAULIC IMPACTS DURING CONSTRUCTION

Rick Engineering Company has prepared a preliminary assessment of the hydraulic impacts of the proposed temporary construction options anticipated for the El Camino Real Bridge. This section is intended to summarize the temporary hydraulic conditions that should be considered for potential construction methods.

As described previously, the construction methods specific to the bridge include the use of a Berm and/or Trestle in order to provide the required construction access and platform for equipment during construction. These access areas are already considered within the project boundary and in addition to the structural considerations of constructing the bridge; biological resources and hydraulic conditions within the river corridor are being considered. Therefore, an approach reflecting each of these potential issues is needed. Hydraulic issues should include specific return frequency storm events, daily flows, and tidal flow (if applicable). At this time, tidal flows are not being considered since the approximate limit of tidal influence is considered to occur at the downstream edge of the bridge.

Construction Phase

In order to provide required access for construction equipment, the berm or trestle option will need to elevate the berm/trestle to an elevation that is above daily flows within the river, however, low enough that it limits potential increases in water surface elevations for larger storm The main channel of the river corridor contains events (i.e. - 100-year storm event). approximately the 10-year storm event; however, nearly the entire 100-year storm event is conveyed under the existing bridge along the main channel corridor. During previous site visits, daily flows have been observed to occur at in the lower foot of the channel (plus or minus). Therefore, an opening in the berm would be needed, either in the form of culverts or a low flow channel opening that is sized to convey these daily flows, plus up to a preferred storm event (i.e. 2-year storm event or 1-inch storm event, etc). It is important to note that providing an opening to convey the 10-year storm event would not be practical since the main channel capacity is already limited to the 10-year storm event. Given the biological resources which include the presence of clapper rail and other species, a natural low flow opening may be preferable to allow a wildlife corridor during construction. Based on input from the structural engineer, it sounds like a 30 to 40-foot span could be provided over such a low-flow opening, which may equate to approximately a 20-foot bottom width. If additional low-flow capacity is needed, culverts could also be added to extend through the berm.

For typical construction activities, equipment can be removed at the end of each work day outside the limits of the main channel. However, for the large platform and crane that will be needed, it is not practical to remove at the end of each work day; therefore, this would be removed only with a predicted chance of precipitation greater than a specified amount (i.e. -a 50% chance of precipitation for 0.5 inches of rain or greater). For example, if the low-flow system has capacity to convey anticipated runoff from a 1-inch storm event, then the equipment would be removed if there is a 50% chance of precipitation expected to exceed 0.5-inches (providing a factor of safety).

In summary, key hydraulic considerations include:

- Elevation of temporary berm or trestle
- Low-flow opening(s) sized for daily flows and up to a specific storm event (i.e. 1- inch storm or 2-year storm event)
- Minimize increase to water surface elevations for larger storm events (i.e. 10-year, 50-year, 100-year).
- Removal of equipment from the channel with the prediction of storm events larger than those capable of bypassing through the low flow opening(s), including a factor of safety.

Modeling and Analysis

Once a preferred approach is selected, modeling can be provided to assess required elevations for the berm/trestle, capacity of low-flow openings, impacts to water surface elevations, and storm events that can be passed through the temporary configuration within the bridge corridor.

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Appendix E

Letters of Comment on 2006 Draft EIR

El Camino Real Bridge – EIR Comment Letters

Native American Heritage Commission San Diego County Archaeological Society, Inc. R.B. General, LLC Barbara Salvini, City of San Diego County of San Diego Hecht, Solberg, Robinson, Goldberg, Bagley Dr. & Mrs. Hu California Coastal Commission Carl Schroeder State of California Wertz, McDade, Wallace, Moot, Brower San Pasqual Reservation City of Del Mar Carmel Valley Community Planning Board San Dieguito Planning Group Santa Fe Irrigation District San Diego Audubon Society Rancho Santa Fe Association Friends of San Dieguito River Valley Allen Matkins San Dieguito River Valley Regional Open Space Park US Fish & Wildlife and Cal Fish & Game State of California, State Clearinghouse and Planning Unit July 28, 2006 July 29, 2006 August 21, 2006 August 29, 2006 August 30, 2006 September 5, 2006 September 6, 2006 September 6, 2006 September 11, 2006 September 12, 2006 October 2, 2006 October 9, 2006 October 9, 2006 October 10, 2006 October 12, 2006 October 15, 2006 October 17, 2006 October 19, 2006 October 19, 2006 October 19, 2006 October 20, 2006 October 23, 2006 October 24, 2006

STATE OF CALIFORNIA

Amold Schwarzenegger, Governor

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 384 SACRAMENTO, CA 95914 (916) 653-4082 Fax (916) 657-5390 Web Site www.naho.ca.gov

July 28, 2006

Ms. Donna Clark

City of San Diego Development Services Department 1222 First Avenue, MS 501 San Diego, CA 92101

Re: <u>SCH#2006071104; CEQA Draft EIR; Development Permit</u>, <u>Widening El Camino Real and Replacing Bridge of</u> San Dieguito River crossed by Via De La Valle; North City future urbanization; San Diego County, California.

Dear Ms. Clark:

Thank you for the opportunity to comment on the above-referenced document. The California Environmental Quality Act (CEQA) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR per CEQA guidelines § 15064.5(b)(c). In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the area of project effect (APE), and if so, to mitigate that effect. To adequately assess the project-related impacts on historical resources, the Commission recommends the following action:

√ Contact the appropriate California Historic Resources Information Center (CHRIS). The record search will determine:

- If a part or the entire APE) has been previously surveyed for cultural resources.
- If any known cultural resources have already been recorded in or adjacent to the APE.
- If the probability is low, moderate, or high that cultural resources are located in the APE.
- If a survey is required to determine whether previously unrecorded cultural resources are present.

 $\sqrt{1}$ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.

- The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
- The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.

V Contact the Native American Heritage Commission (NAHC) for:

- * A Sacred Lands File (SLF) search of the project area and information on tribal contacts in the project vicinity who may have additional cultural resource information. Please provide this office with the following citation format to assist with the Sacred Lands File search request. <u>USGS 7.5-minute guadrangle citation</u> with name, township, range and section;
- The NAHC advises the use of Native American Monitors to ensure proper identification and care given cultural resources that may be discovered. The NAHC recommends that contact be made with Native American Contacts on the attached list to get their input on potential project impact, particularly the contacts of the on the list.

 $\sqrt{}$ Lack of surface evidence of archeological resources does not preclude their subsurface existence.

- Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5 (f).
 In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
- Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.

 $\sqrt{}$ Lead agencies should include provisions for discovery of Native American human remains or unmarked cemeteries in their mitigation plans.

* CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens.

 \checkmark Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the CEQA Guidelines mandate procedures to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cometery.

<u>V</u> Lead agencies should consider avoidance, as defined in § 15370 of the CEQA Guidelines, when significant cultural resources are discovered during the course of project planning.

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely Dave Singleter Program Analys

Cc: State Clearinghouse Attachment: List of Native American Contacts Barona Group of the Capitan Grande Rhonda Welch-Scalco, Chairperson 1095 Barona Road Diegueno , CA 92040 Lakeside sue@barona.org (619) 443-6612

Native American Contact San Diego County July 28, 2006 San Pasqual Band of Mission Indians Allen E. Lawson, Chairperson PO Box 365 Diegueno Valley Center .CA 92082

Kumeyaay Cultural Historic Committee

,CA 92001

(760) 749-3200

56 Viejas Grade Road

(760) 749-3876 Fax

Ron Christman

(619) 445-0385

Alpine

Santa Ysabel Band of Diegueno Indians Johnny Hernandez, Spokesman **PO Box 130** Diequeno Santa Ysabel ,CA 92070 brandietavior@yahoo. (760) 765-0845

(760) 765-0320 Fax

Los Covotes Band of Mission Indians Katherine Saubel, Spokesperson P.O. Box 189 Cahuilla Warner Springs , CA 92086

(760) 782-0711

(760) 782-2701 - FAX

Pala Band of Mission Indians Robert Smith, Chairperson PMB 50, 35008 Pala Temecula Road Pala ,CA 92059

(760) 742-3784

(760) 742-1411 Fax

Mesa Grande Band of Mission Indians Mark Romero, Chairperson P.O Box 270 Santa Ysabel CA 92070 mesagrandeband@m (760) 782-3818

Diegueno

Diegueno/

(760) 782-9092 Fax

Kumeyaay Cultural Heritage Preservation Paul Cuero 36190 Church Road, Suite 5 , CA 91906 Campo

Diegueno/

(619) 478-9046 (619) 478-9505 (619) 478-5818 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

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Cupeno

This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#1999071104; CEQA Draft EIR, Specific Plan for El Camino real Road/Bridge Widening Project; crosssed by San Dieguito. Road and Via De La Vi near Interstate 5; replace existing bridge over San Dieguito River; North City/County; San Diego County, California.

07/28/2006 13:12 FAX 916 657 5390	NAHC	2 004
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	Native American Contac San Diego County July 28, 2006	t
Kwaaymii Laguna Band of Mission India Carmen Lucas P.O. Box 775 Pine Valley , CA 91962 Die	ans Kumeyaay Cultura Steve Banegas, S 1095 Barona Road	
(619) 709-4207	(619) 443-6612	
· •	(619) 443-0681 FA	x
San Luis Rey Band of Mission Indians Russell Romo, Chairman 12064 Old Pomerado Road Poway , CA 92064 (858) 748-1586	P.O. Box 369	
Santa Ysabel Band of Diegueno Indians Devon Reed Lomayesva, Esq, Tribal At PO Box 130 Dieg Santa Ysabel , CA 92070 Dieg (760) 765-0845 (760) 765-0320 Fax	torney Carmen Mojado, C aueno 1889 Sunset Dr.	d of Mission Indians Co-Chair , CA 92081 ^{Luiseno}
(700) 705-0320 Fax		
	Seno Cupa Cultural Cen Shasta Gaughen, J 35008 Pala-Temecula Re Pala , cupa@palatribe.co (760) 742-1590	Assistant Director d.PMB Box 445 CA 92059 Luiseno

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,CA 92070

Native American Contact San Diego County July 28, 2006

Clint Linton P.O. Box 507 Santa Ysabel

Diegueno/

(760) 803-5694

cjlinton73@aol.com

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

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To:

San Diego County Archaeological Society, Inc.

Environmental Review Committee

29 July 2006

Ms. Donna Clark Development Services Department City of San Diego 1222 First Avenue, Mail Station 501 San Diego, California 92101

Subject: Draft Environmental Impact Report El Camino Real Road/Bridge Widening Project Project No. 2982

Dear Ms. Clark:

I have reviewed the historical resources aspects of the subject DEIR on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the DEIR and it archaeological and historical properties assessment appendices, we agree with the impact analysis and mitigation measures as prescribed in the DEIR.

SDCAS appreciates being included in the City's environmental review process for this project.

Sincerely,

Japies W. Royle, Jr., Chairr Environmental Review Committee

cc: Tierra Environmental Services SDCAS President File

RB General, LLC

August 21, 2006

Donna Clark Environmental Planner, City of San Diego Development Services Center 1222 First Avenue, MS 501 San Diego, CA 92101

Roger Boesky Managing Member, Polo Plaza, LLC 810 Emerald Street San Diego, 92109

SUBJECT: EL CAMINO REAL ROAD/BRIDGE WIDENING PROJECT AFFECTING 3790 and 3702 Via de la Valle, Del Mar, CA 92014

To Whom It May Concern:

We are the owners of the shopping centers at 3790 Via de la Valle and 3702 Via de la Valle. Del mar, CA 92014. Either of the two proposed bridge widening projects will substantially change the traffic pattern for our buildings and it is imperative that the following issues are considered before construction, to ensure a safe and reasonable raffic pattern in the areas affected.

We have employed Jim Federhart, a licensed engineer specializing in traffic studies to assist us in the proposed projects set forth above. His findings are attached to this letter for your consideration. I have attached a map outlining the entrances to our property for your reference, as well as maps showing the four (4) U-Turns that we are requesting to be installed.

We ask that you consider these changes, not only for the safety of the public, but to recognize the rights of reasonable and convenient access that our tenants, guests and invitees have grown accustom to over the past 20 years.

<u>WESTERN ALIGNMENT</u> – Expanding the existing El Camino Real roadway The plan that we would prefer, is the one that will cause the least disruption to the existing traffic pattern. This plan involves keeping El Camino Real in its current location and widening the existing road and the existing bridge.

El Camino Real intersects at Via de la Valle directly in front of our 3702 Via de la Valle building. With the expansion of this traditional alignment, traffic heading north on El Camino Real would have a traffic signal allowing traffic to continue straight into our parking area. It would also allow for a signalized left turn into our parking area for traffic traveling east on Via de la Valle.

This alignment uses the existing El Camino Real roadway and seems the most logical for an expansion by utilizing existing casements and existing roadways.

Under both plans, there will be a raised median dividing the road along the frontage of our property. The raised medians will change the ease of ingress and egress into our

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810 Emerald, San Diego, CA 92109 Phone 858 272 1245 • Fax 858 272 1563

rbgener@aoi.com

property. To increase safety, and to not restrict access into the property, we are requesting signaled U-turns to be installed at each intersection affected by the road work and raised medians.

We request a signaled U-turn at the following intersections:

1. We request a signaled U-turn at Via del Canon/Via de la Valle for west bound traffic on Via de la Valle to return east.

2. We request a signaled U-turn at El Camino Real/Via de la Valle for east bound traffic on Via de la Valle to return west.

3. We request a signaled U-turn at El Camino Real/Via de la Valle for west bound traffic on Via de la Valle to return east.

4. We request a signaled U-turn at El Camino Real North/Via de la Valle for cast bound traffic on Via de la Valle to return west.

It is imperative that, if the raised median is installed as planned, that each of these intersections not only have a traffic signal, but that they each allow for a U-Turn for our guests and tenants to be able to safely and conveniently access our property.

EASTERN ALIGNMENT-Moving El Camino Real Roadway

The second proposal is moving El Camino Real, known as the "Eastern Alignment". In this proposed arrangement, we would still request four (4) signaled U-turns are made available to allow safe access to our property since the raised medians will not allow for a left turn into our property while heading east on Via de la Valle.

The signaled U-turns are also vital for those wishing to head east after leaving our property.

1. We request a signaled U-turn at Via del Canon/Via de la Valle for west bound traffic on Via de la Valle to return east.

2. We request a signaled U-turn at El Camino Real/De la Valle Place for east bound traffic on Via de la Valle to return west.

3. We request a signaled U-turn at El Camino Real/De la Valle Place for west bound traffic on Via de la Valle to return east.

4. We request a signaled U-turn at El Camino Real North/Via de la Valle for east bound traffic on Via de la Valle to return west.

Thank you in advance for considering the four (4) signaled U-turns and helping to ensure the safety of our clients and patrons during this time of growth and expansion.

Sincerely,

⁷Róger Boesky Polo Plaza, LLC RB General, LLC Managing Member

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810 Emerald, San Diego, CA 92109 Phone 958 272 1245 • Fax 858 272 1563

<u>.</u>

rbgener@aol.com

3790 Via de la Valle, Del Mar. CA 92014 Phone 858 792 6600 • Fax 858 792 6384



THE CITY OF SAN DIEGO

August 29, 2006

Ms. Donna Clark, Environmental Planner, City of San Diego Development Services Center 1222 First Avenue, MS 501 San Diego, CA 92101

Dear Ms. Clark:

Subject: Draft Environmental Impact Report for El Camino Real Road/ Bridge Widening Project

We have reviewed the subject report dated July 25, 2006 which was received by our offices July 25, 2006. Our comments as follows:

The Metropolitan Wastewater Department has existing facilities that would be affected by the subject project. All existing sewer facilities are described on pages 3.6-3 in the report.

The existing sewer facilities need to be evaluated for impact from the project. According to your report additional fill will be placed over the existing sewer alignment. Please provide loading calculations for the existing sewer main with the anticipated fill load.

If you choose the relocation alternative for the existing sewer mains within your project area, you must submit a sewer study, contents of which are outlined in the "2004 City of San Diego's Sewer Design Guide" and sewer relocation plans to MWWD/Development/Wastewater, Barbara Salvini., Senior Civil Engineer, 600 B St., Suite 2210, San Diego, CA 92101.

If you have any questions or require any additional information please call me at 619-533-5106 or Assistant Engineer Irina Itkin at 619 533-4248.

Sincerely,

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Burbaro Giro, Salu-

BARBARA A.B. SALVINI Senior Civil Engineer



Ms. Donna Clark August 29, 2006 Page 2

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cc: Chris Toth, Deputy Director, Metropolitan Wastewater Department Ann Sasaki, Deputy Director, Metropolitan Wastewater Department Isam Hireish, Senior Civil Engineer, Metropolitan Wastewater Department Mehdi Rastakhiz, Associate Engineer-Civil, Metropolitan Wastewater Department Hushmand Yazdani, Associate Engineer-Civil, Metropolitan Wastewater Department Janet Buttmann, Assistant Engineer-Civil, Metropolitan Wastewater Department

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CITY OF SAN DIEGO M E M O R A N D U M

DATE:	September 21, 2006
TO:	Abi Palaseyed, Engineering and Capital Projects
FROM:	Donna Clark, Development Services
SUBJECT:	El Camino Real Road/Bridge Widening Project

Attached is a letter I received from the water and sewer reviewer in response to the draft EIR. We do not respond in the EIR to comment letters from City departments. Therefore, I am attaching a note to the letter when I forward it to Katherine telling her not to provide a response. However, I still need to respond to Barbara Salvini's letter.

Please review the letter and provide responses to her issues and send to me so that I may write a formal letter. You may want to discuss with Katherine whether the EIR needs any revision in regard to the issues raised in the letter.

If you have any questions, please let me know.

Thank you!



County of San Diego

DEPARTMENT OF PUBLIC WORKS

JOHN L. SNYDER DIRECTOR

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5555 OVERLAND AVE, SUITE 2188 SAN DIEGO, CALIFORNIA 92123-1295 (858) 694-2212 FAX: (858) 268-0461 Web Site: sdcdpw.org

August 30, 2006

Donna Clark Environmental Planner City of San Diego Development Services Center 1222 First Avenue, MS 501 San Diego, CA 92101

Dear Ms. Clark:

PROJECT NUMBER 2982; EL CAMINO REAL ROAD / BRIDGE WIDENING PROJECT

San Diego County Department of Public Works staff has reviewed the Transportation Analysis (TA) prepared by Urban Systems Associates, Inc dated May 9, 2006 regarding the City of San Diego's proposed El Camino Real road/bridge widening project. The project proposes to widen El Camino Real from two to four lanes between Via de la Valle and San Dieguito Road. The following are our comments:

- The TA should indicate if the proposed road/bridge widening is in conformance with the City's Circulation Element classification for El Camino Real.
- The TA should include a "with" and "without/no build" project analysis to determine what effect the proposed project would have on year 2030 traffic volumes for the segments of El Camino Real, San Dieguito Road, and Via de la Valle located within the County's jurisdiction. The TA should verify that the proposed project and the resulting redistribution of traffic for study area roads will not cause significant traffic impacts to County roadway facilities.
- The LOS tables in the TA should identify which roadway segments and intersections are located within the County's jurisdiction.
- The LOS assessment of roadway segments within the County's jurisdiction should be based on the County's Public Road Standard LOS Criteria.

Ms. Clark August 30, 2006 Page 2

- The TIA should identify if the eastern segments of Via de la Valle at the Via de la Valle/El Camino Real intersection is maintained by the City or the County.
- The TA should note that the County would require construction and encroachment permits for any work performed within the County's right-of-way.
- The TA only includes a year 2030 analysis. If the TA will function as a projectlevel/specific analysis instead of a program-level assessment, the TA should provide the following information:
 - An opening day (post-widening) analysis
 - Fully dimensioned conceptual striping and signing plans for all proposed road and intersection improvements.
 - Plans that show existing and future right-of-way along project roadway segments
 - City staff should coordinate with the DPW Traffic Section regarding proposed improvements affecting County roads. All proposed traffic control mitigation measures should be coordinated with the County's DPW Traffic Section.

If you have any questions or need additional information, please contact Lee Shick, DPW Project Manager, at (858) 694-3235.

Sincerely,

RILE. Cpto

RICHARD E. CROMPTON, Assistant Director Department of Public Works

cc: Darren Gretler (O336); Bob Goralka (O334); Nick Ortiz (O334), Mike Robinson (O334); Eric Swanson (O334); Tom Harrington (O200); Lee Shick (O336); Greg Carlton (O336)

 HECHT
SOLBERG
ROBINSON
GOLDBERG
BAGLEY
 LLP

PAUL E. ROBINSON E-Mail:probinson@hsrgb.com

September 5, 2006

Via E-mail and U.S. Mail

Donna Clark, Environmental Planner City of San Diego Development Services Center 1222 First Avenue, MS 501 San Diego, California 92101

El Camino Real Road, Bridge Widening Project Ret Project No. 2982, SCH No. 1999071104

Dear Ms. Clark:

On behalf of our client, the San Diego Polo Club ("Polo Club"), we are submitting comments on the Draft Environmental Impact Report ("DEIR") for the above-referenced matter ("Project"). The DEIR's preferred eastern alignment would significantly impact the Polo Club's property and its operations. The eastern alignment would encroach into an existing polo field resulting in a loss of the entire polo field and thereby reducing the number of polo fields from five to four. The loss of the polo field could bring about the cancellation of soccer practices and the bi-annual Surf Cup. In addition, the Polo Club would have to buy back or reduce the number of Polo Club memberships offered. Any reduction in membership or activities at the Polo Club results in an enormous financial impact to the Polo Club.

In addition, any closure of the El Camino Real entrance to the Polo Club's property, although temporary, would create a significant safety hazard by forcing Polo Club patrons to use other entrances to and parking areas of the Polo Club that were not designed for high volume use. This closure would cause motor vehicles to closely mix with the numerous horses housed at the Polo Club. This safety concern could result in the cancellation of the Sunday polo matches, costing the Polo Club approximately \$200,000 per year in lost revenues, and cancellation of soccer practices for the Surf Cup.

In light of the foregoing, the Polo Club supports the DEIR's central or western alignment alternatives. Should you have any questions concerning our client's comments, please do not hesitate to contact me.

Sincerely.

Paul E. Robinson HECHT SOLBERG ROBINSON GOLDBERG & BAGLEY LLP

PER/ma 60495.00 313682_2

Council President Scott Peters CC: Jim Waring, Chief Operating Officer, Land Use and Economic Development Mr. Chris Maloney, San Diego Polo Club Mr. Chris Collins, San Diego Polo Club

ATTORNEYS AT LAW 600 WEST BROADWAY, EKSHTH FLOOR SAN DIEGO, CALIFORNIA 92101 TELEPHONE 619,239,3444 FACSIMLE 619,232,6828

Dr. and Mrs. T. C. Hu 8775 Costa Verde Boulevard, No. 604 San Diego, CA 92122

September 6, 2006

Ms. Donna Clark Environmental Planner City of San Diego Development Services Center 1222 First Avenue, MS 501 San Diego, CA 92101

Re: Draft Environmental Impact Report JO 119733; Project No. 2982; SCH No. 1999071104 El Camino Real Road/Bridge Widening Project

Dear Ms. Clark:

My family represents one of the few private property owners directly affected by the subject project. We own approximately 24 acres located on the south side of Via de la Valle, just east of El Camino Real. Our property consists of three legal parcels (APN # 302-090-29-00, 302-090-31-00, and 302-090-32-00). We want to thank you for the opportunity to submit our comments in response to the above referenced environmental impact report. It is obvious that a Herculean effort has been undertaken to create the most comprehensive document possible. This effort is most appreciated. We are generally in support of the project and hope that the Decision Maker selects the best alternative that fulfills the needs of the City, the Community and those impacted by the project.

While it may be appropriate to suggest a number of minor corrections or clarifications to the Report, most of these adjustments would not result in any revision to the conclusions made by this Report. Consequently, we would rather focus on a few major issues that materially impact both the Project and our property. These issues will be discussed below:

Land Use: In Section 3.1.2.1 and in Table 3.1-1, the Report characterizes our property as simply being "vacant". Overall, the Report gives the impression that, without a phase shift, the highest and best use of the property is nothing more than open space. This characterization draws the reader to the conclusion that our property could easily provide the right-of-way necessary for this Project with little or no consequence to the utilization of the balance of our property.

This characterization is both inaccurate and unreasonable. Over the 27 years of our ownership alone, the property has been used agriculturally to grow and sell crops. It was used for over ten years by the North County Riding School (horses). The City even

Letter to Ms. Donna Clark El Camino Real Road/Bridge Widening Project Draft Environmental Impact Report JO 119733; Project No. 2982; SCH No. 1999071104 September 6, 2006 Page 2

presented us with a citation for making the property available to the Olympics when the equestrian events were here back in 1984. Those familiar with the area also know that our property is used regularly for parking for the Surf Cup soccer tournaments and the San Diego County Fair.

Even though the Report cites the North City Future Urbanizing Area Framework Plan as the current planning document (Section 3.1), the identified use of our property is not open space but rather Estate Residential and Commercial Recreation. While it may be common knowledge that the existing A-1 zoning was applied simply as a "holding zone", even without a zone change, the A-1 zone would also permit residential development, churches, schools, senior housing and other institutional uses on our property. Consequently, it is respectfully requested that the Report be revised to reflect the proposed land uses for our property consistent with the adopted Framework Plan.

Wetlands: With each of the evaluated alternatives, the Project proposes to construct a drainage channel approximately 60 feet wide along the southerly side of the proposed Via de la Valle right-of-way to accommodate approximately 616 cfs of runoff originating on the north side of Via de la Valle. As clearly documented in Appendix "A" of the Report, the installation of the existing drainage facilities underneath Via de la Valle in 1986-87, discharging onto our property, was done so illegally and without our permission. This illegal installation resulted in the creation of wetlands vegetation in the existing drainage swale that presently runs westerly along the southerly side of Via de la Valle. This is in spite of the fact that in the Abstract of Judgment regarding a Superior Court decision, which was made in 1996, stated that our property "... is not wetland or environmentally sensitive." To perpetuate this illegal activity with the construction of an even larger drainage facility and then revegetate it with wetland species is seemingly inappropriate. In Section 3.7, the Report clarifies that this drainage channel was selected in order to evaluate the most significant impact possible. However, the scope of the project should be revised to eliminate a component that, through its genesis, was created illegally. We respectfully request that the scope of the project be revised to eliminate the drainage channel and to replace it with a storm drain conduit that can be situated within the proposed Via de la Valle right-of-way.

<u>Hydraulics</u>: Hydraulically, the drainage channel proposed for the southerly side of Via de la Valle won't work as currently plotted. The plans call for approximately 600 cfs to be transported underneath Via de la Valle within a newly constructed box culvert and discharged into the drainage channel where the flow is expected to make an immediate 90° turn to the west within a 60' wide earth-lined channel. Flow of this magnitude cannot make this turn in this small of an area, particularly within an earth-lined channel. Consequently, the size of the drainage channel, specifically at the point of this change in

Letter to Ms. Donna Clark El Camino Real Road/Bridge Widening Project Draft Environmental Impact Report JO 119733; Project No. 2982; SCH No. 1999071104 September 6, 2006 Page 3

flow direction, is understated. This design detail deficiency only reinforces the conclusion that the 100 year storm flow originating northerly of Via de la Valle should be contained in a box culvert at this location as the flow can not be expected to be contained in an open channel as currently depicted.

<u>Access</u>: Although our property currently does not take physical access off of Via de la Valle between the intersections of El Camino Real South and El Camino Real North, we are not precluded from doing so. That not withstanding, we have never been asked to relinquish our access rights to Via de la Valle between these two intersections. Following the road widening improvements on Via de la Valle, our property will still have approximately 900 lineal feet of frontage to Via de la Valle where access could be taken. However, the proposed construction of a 60-foot wide open drainage channel along the southerly side of Via de la Valle. This denial of physical access should be addressed in Section 3.2.3.2 Issue 1b (page 3.2-9) as a Long-term Impact. As discussed in the paragraphs above, this long-term impact could be easily mitigated by the substitution of a box culvert for the open channel.

Ultimate Improvement of Via de la Valle: The Framework Plan classifies Via de la Valle between El Camino Real South and El Camino Real North as a four-lane major roadway. However, the project proposed to transition from four lanes at El Camino Real South to two lanes before traffic reaches the intersection of El Camino Real North. The proposed Year 2030 volumes of traffic eastbound on Via de la Valle, e.g. 23,500 ADT (Table 3.2-5), can not be accommodated at an acceptable level of service, e.g. LOS C, with only two travel lanes. It only makes sense to fully improve Via de la Valle as a four-lane roadway between the two El Camino Real intersections and thus achieve a true Level of Service C and then taper back to two lanes easterly of the intersection of El Camino Real North where it is anticipated that Via de la Valle will never be widened to four-lanes. At this point, however, the Report does not address this requirement and its associated impacts.

<u>Impacts of Bridge Construction on Private Development</u>: In the "Hydraulics Section" of Section 3.7.3.1 Issue 1a: Impacts on Hydrology and Hydraulics of the San Dieguito River (page 3.7-19), it states the following:

"Regardless, the proposed steepening of the abutments under the bridge from 2:1 to 1.5:1 would provide the additional capacity needed to offset the potential increase in water surface elevation upstream. The existing condition 100-year water surface elevations estimated with year 2004 topography would be maintained or lowered (as shown in the previous table, Table 3.7-2).

Letter to Ms. Donna Clark El Camino Real Road/Bridge Widening Project Draft Environmental Impact Report JO 119733; Project No. 2982; SCH No. 1999071104 September 6, 2006 Page 4

Table 3.7-2 goes on further to demonstrate that, with the design features for the El Camino Real bridge, the proposed water surface elevation for the 100-year flood easterly of the bridge will be less than that under existing conditions. It is not clear, however, if the analysis performed by Rick Engineering Company – April 2006 anticipated any development of our property. Any future fill on our property to elevate site improvements to above the 100-year flood levels could impact flood flows at or upstream of the bridge.

Normally, grading upstream would be an individual private development concern. However, since the bridge construction will go first, its design will dictate what can or cannot ultimately be accomplished upstream of the bridge. If the bridge construction limits our ability to fill portions of our property, e.g. it becomes economically infeasible to improve our property once the bridge construction has been completed, then the construction of the bridge has created a long term – permanent impact to our property. This impact should be analyzed and then discussed in Section 3.7.3.1. Failure to incorporate this matter into the design of the bridge would be tantamount to condemnation of our property. Hopefully, that will not be the case. However, such documentation needs to be incorporated into this Report.

Thank you again for the opportunity to comment on this Report. I would be more than happy to meet with you to discuss the above and any other issues related to this project.

Sincerely yours,

cc.

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Dr. T.C. Hu, PhD. Property Owner, PIF #2

Mr. John D. Leppert, Leppert Engineering Corporation

STATE OF CALLFORNIA -- THE RESOURCES AGENCY

CALIFORNIA COASTAL COMMISSION SAN DIEGO AREA 7575 METROPOLITAN DRIVE, SUITE 103 SAN DIEGO, CA 92108-4421 (619) 767-2370



September 6, 2006

City of San Diego Development Services Center Attn: Donna Clark, Environmental Planner 1222 First Avenue, MS 501 San Diego, CA 92101

Re: Project No. 2981, SCH No. 1999071104 (El Camino Real Bridge EIR)

Dear Ms. Clark:

Thank you for providing the opportunity to review the draft Environmental Impact Report (EIR) for the El Camino Real Road/Bridge Widening project. Unfortunately, workload constraints do not permit a thorough review of this document at this time. The following comments are those that were immediately apparent in a brief overview of the document. The draft EIR raises a number of issues, particularly with respect to coastal development permit jurisdiction. As explained below, the Coastal Commission has coastal development permit jurisdiction for this project.

In the draft EIR, Coastal Development Permit jurisdiction has been determined through use of the City of San Diego's C-730 map series. However, for purposes of depicting coastal development permit jurisdiction, these maps are in draft form and contain many errors. The project site is in an area of deferred certification, which means coastal development permit jurisdiction rests solely with the California Coastal Commission, not with the City of San Diego. The Commission's partial approval of the North City Future Urbanizing Area (NCFUA) Framework Plan in 1993 specifically identified that coastal development permit authority would only transfer to the City of San Diego upon certification of subarea plans. When the Commission certified Subarea III (Pacific Highlands Ranch) and Subarea V (Del Mar Mesa), the City requested coastal development permit authority for those specific subareas, and the Commission formally transferred said authority to the City at the time the plans were effectively certified.

The project site is located in Subarea II of the NCFUA. No subarea plan has ever been certified for Subarea II (as noted on Page 3.1-2 of the draft EIR), such that the entire subarea in the coastal zone remains in the Coastal Commission's coastal development permit jurisdiction. As such, the legal standard of review for the coastal development permit is Chapter 3 of the Coastal Act, although the cited planning documents will be considered as guidance. The incorrect coastal development permit jurisdiction is cited on Pages 1-5, 1-9, 1-11, 1-16, 2-20, not cited at all on Table 2-2 on Page 2-21, and again cited incorrectly on Page 3.1-2 of the Draft EIR. Figure 3.1-3 is also incorrect. In addition, Section 3.12.1.2 fails to identify the Coastal Commission within the Regulatory Setting as regulating biological resources pursuant to Coastal Act policies.

City of San Diego/Clark August 31, 2006 Page 2

Also on Page 1-10 or 1-11, and in Table 2-2 on Page 2-21, it should be noted that a Federal Consistency Certification from the California Coastal Commission may be required because of the need for federal permits and use of federal monies for the proposed development. Ultimately, the Consistency Certification process may be waived since the Commission will also be issuing the Coastal Development Permit; however, at this time, it should be identified as a required discretionary approval.

The draft EIR identifies that the San Dieguito River Park Joint Powers Authority (JPA) property west of El Camino Real and south of the San Dieguito River (formerly Boudreau property) will be used as the project's mitigation site. This property is also identified as the site of mitigation for the JPA trails portion of the San Dieguito Wetlands Restoration Plan. The draft indicates that the project applicant and JPA are coordinating on use of this site. As such, we are making an assumption that the site is large enough to accommodate both mitigation proposals.

The Coastal Commission will be reviewing the application for the coastal development permit for this project. The main issues the Commission is likely to focus on are biological resources, hydrology, visual amenities and public access. These issues will be addressed in the context of Chapter 3 policies of the Coastal Act of 1976. In addition, the Commission is researching how the proposed development will affect the location of the coastal zone boundary, especially if the eastern alignment is chosen for the proposed project.

Again, thank you for the opportunity to review the draft EIR for the El Camino Real Road/Bridge project. Although it will not be possible to prepare additional comments within the allotted review period, the final document will be consulted as part of the coastal development permit process. Please call me if you have any questions.

Sincerely,

len Toiley

Ellen Lirley Coastal Planner

cc: Sherilyn Sarb, Coastal Commission Larry Simon, Coastal Commission

(G:\San Diego\ELLEN\EIR Comments\El Camino Real Bridge EIR Comment Letter.doc)

SEP 17 MB To: Donna Clark Fron : Casl Schroeder Re : Project No. 2982 (ElCanino Real + Via de la Valle) Thank you for giving my father the information on the referenced project. Whave reviewed all the information and an attaching my response as af affected business owner D work beven dans all week from 10Am to 11 or 12 P.M. Therefore dive deked my dad to help me with this important issue. You may contact me directly Jusing my cell phone 85/8-259-7603 or it may be gainen to dontact my father at 858-459-1611. Please send all notices of hearings are other information. to me at CARLON. SCHROEDER % R.A. SCHROEDER 7733 WHITEFIELD PL. LA JOLLA, CA 92037

September 11, 2006

Donna Clark, Environmental Planner City of San Diego Development Services Center 1222 First Avenue MS 501 San Diego, CA 92101

Re: Project No. 2982, SCH No. 1999071104 El Camino Real Road/Bridge Widening Project

Dear Ms. Clark:

I am the managing owner and chef of Blackhorse Grille, a popular restaurant, located on the ground floor of a two story building at 3702 Via de la Valle (where El Camino Real terminates at Via de la Valle). This property may be seriously impacted by the above referenced project. My restaurant serves over 150 patrons for dinner 7 days a week and employs over 30 staff members.

The only parking lot exclusively allocated for parking by our customers and unloading by delivery trucks servicing my restaurant is located along Via de la Valle, adjacent to the west of my restaurant. For both adequate traffic flow and health/safety reasons, the parking area has two entrances/exits on Via de la Valle (referred to as the west entrance/exit and the east entrance/exit).

The west entrance/exit allows traffic coming from the east and south to enter the restaurant lot. When exiting from the west entrance/exit cars and trucks are restricted to a right turn (west only). Therefore, the west exit is used only by traffic whose destination is west from the restaurant.

The east entrance/exit is tied into the current fully signalized intersection of Via de la Valle and El Camino Real. The traffic control lights at the intersection allow the restaurant customers and service vehicles to enter the lot from the south, east, and west. The traffic control lights also allow the cars and trucks to exit the lot and turn east or west on Via de la Valle or continue south through the traffic signal on El Camino Real. The majority of my restaurant's customers come from the east and south. Therefore, the current alignment allows them to exit from the parking lot in a way that takes them back to their homes and businesses in a very direct path.

The Central Alignment Plan being considered within the above referenced proposal maintains the current traffic linkage that continues this efficient and safe flow of traffic.

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Therefore, on behalf of myself, the restaurant's investors, employees and customers, I urge its adoption.

If the Eastern Alignment Plan is selected, a raised median would be built along the entire frontage of the restaurant and parking lot, forcing <u>all</u> of the customers and vendors exiting the lot to travel <u>only</u> in a westerly direction. This forced exit pattern would take <u>all east and south</u> destination automobiles and vendor trucks all the way west to the Flower Hill Mall near Highway 5 before they could make a U-Turn to start a return to their homes or business stops to the east or south of the restaurant. This Eastern Alignment Plan, thus, at best, places more traffic on Via de la Valle, creating traffic, environmental, and business problems.

If adopted, the Eastern Alignment Plan would probably destroy my restaurant business and also would make the space we lease near by unleasable to others. I hope the referenced environmental report will consider the people who will be affected by each solution proposed within the referenced project report. In my case, the people affected by your decision are the ownership, the employees, the vendors and most of the restaurant's customers.

I respectfully request you adopt the Central Alignment Plan to avert the adverse environmental and human effects outlined in this letter.

Very truly yours,

hul Carl N. Schroeder

Chef/Managing Owner Blackhorse Grille



Arnold Schwarzenegger Governor

STATE OF CALIFORNIA Governor's Office of Planning and Research State Clearinghouse and Planning Unit



Sean Walsh Director

Memorandum

Date:September 12, 2006To:All Reviewing AgenciesFrom:Scott Morgan, Senior PlannerRe:SCH # 1999071104El Camino Real Road/Bridge Widening

Pursuant to the attached letter, the Lead Agency has extended the review period for the above referenced project to October 21, 2006 to accommodate the review process. All other project information remains the same.

cc:

Donna Clark City of San Diego 1222 First Avenue, MS 501 San Diego, CA 92101

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044

Notice of Completion and Environmental				See NOTE below		
Document Transmittal Form				SCH # 1999071104		
Mail to: State Clearingh	ouse, 1400 Tenth Stre	et, S	Sacramento, CA 95814 916/44	\$5-0613	SCH # 1999071104	
1. Project Title: El Camino Rea	I Road/Bridge Widenin	a Pro	ject			
2. Lead Agency: City of San Die	GO	3.	Contact Person: Donna Clark			
3a. Street Address: 1222 First A			City: San Diego			
3c. County: San Diego		3d.	Zip: <u>92101</u> 3e. Pl	hone: (619)	446-5387	
Project Location El Camino Real b	etween San Dieguito	Road	and Via de la Valle.			
4. County: San Diego		4a.	City/Community: <u>San Diego</u>			
4b. Assessor's Parcel No		4c.	Section:	Township:	Range;	
5. Cross Streets: San Dieguito	Road and Via de la Va	lle	5a. For Rural, Nearest Commun	nity:		
6. Within 2 Miles: a. State Hu	/y #: <u>1-5</u>	6a.	Airports:			
6b. Railways: 6c			Waterways: <u>San Dieguito Rive</u>	я.		
7. Document Type						
			t EIR NEPA: 09. 🗆 NOI 0			
	Prior SCH No.:				Final Document	
	J NOË 1 NOC		11. 🛛 Draft EIS 12. 🖵 EA		. 🛛 Other	
			·····			
8. Local Action Type 01.	05. 🗇 Annexation		09. 🗆 Rezone		12, 🛛 Waste Mgmt Plan	
02. I New Element	06. D Specific Pla				13. Cancel Ag Preserve	
03. General Plan Amendment	07. Community			ap, etc.)	14. Ø Other	
04. 🛛 Master Plan	08. 🛛 Redevelop	nent	11. 🖸 Use Permit		Development Permit	
9. Development Type 06. S Transportation: Ty	pe Road widening and	bride	re replacement			
					CEIVED	
10. Total Acres			11. Total Jobs Created	1		
JÚL 2 6 2006						
12. Project Issues Discussed in Document						
					CLEARING HOUSE	
01. X Aesthetic/Visual	09. X Geologic/Seisn		17. D Social		etland/Binarian	
02. X Agricultural Land	10. D Jobs/Housing		nce 18. X Soil Erosion 19. D Solid Waste	26. X W		
03. X Air Quality 04. X Archaeological/Historical	11. I Minerals		20. Toxic/Hazardous		rowth inducing compatible Land Use	
04. X Archaeological/Historical 05. X Coastal Zone	12. X Noise 13. D Public Service		20. D Toxic/Hazardous 21. X Traffic/Circulation		compatible Land Use	
06. D Economic	14. D Schools	0	22. X Vegetation		leontological Resources	
07. D Fire Hazard	15. C Septic System	s	23. X Water Quality	31.00		
08. XI Flooding/Drainage	16. I Sewer Capacit		24. Water Supply	J	···•·	
13. Funding (approx.) Federal \$	15-19 MILLION		State \$	Total \$		
14. Present Land Use and Zoning:						

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15. Project Description Widen El Camino Real between San Dieguito Road and Via de la Vaile, replace the existing bridge over San Dieguito River, and widen Via de la Valle between El Camino Real and El Camino Real North.

State Clearinghouse Contact 4* (916) 445-0613

State	Review	Began:	

10-21 \overline{E} SCH COMPLIANCE

Exte vian l

Please note State Clearinghouse Number (SCH#) on all Comments

7 - 26 - 2006

2006

SCH#: 1999071104 Please forward late comments directly to the Lead Agency

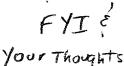
AQMD/APCD_27

(Resources: 7/29)

Project Sent to the following State Agencies

Resources Х Boating & Waterways 🖉 Coastal Comm Colorado Rvr Bd Conservation Conservation X Fish & Game # 5 Delta Protection Comm Forestry & Fire Prot Historic Preservation X Parks & Rec Reclamation Board Bay Cons & Dev Comm OES (Emergency Svcs) Bus Transp Hous Aeronautics <u>Σ</u> CHP X Caltrans # 11 Trans Planning Housing & Com Dev Food & Agriculture Health Services

State/Consumer Svcs General Services Cal EPA ARB - Airport Projects ARB - Transportation Projects ARB - Major Industrial Projects Integrated Waste Mgmt Bd SWRCB: Clean Wir Prog SWRCB: Wir Quality SWRCB: Wir Rights X Reg. WQCB #____ Toxic Sub Ctrl-CTC Yth/Adlt Corrections Corrections Independent Comm Energy Commission
X NAHC
Public Utilities Comm State Lands Comm Tahoe Rgi Plan Agency Ð AN



WERTZ MCDADE WALLACE MOOT BROWER

LAWYERS A

A PROFESSIONAL CORPORATION Lynn M. Beekman J. Michael McDade Sandra I. Brower Kathleen J. McKee Iulie A. Delahunt John S. Moot Richard T. Forsyth Elaine A. Rogers Jenny K. Goodman John H. Stephens Bonny Hsu Robert A. Vacchi Sarah H. Lapham Bruce R. Wallace Joseph C. Lavelle John Ross Wertz Larry L. Marshall Pamela Lawton Wilson

Rebecca Michael Evan S. Ravich

Of Counsel

Administrator Fred Mahady, Jr.

October 2, 2006

Richard Leja, Sr. Civil Engineer City of San Diego Engineering and Capital Projects 1010 Second Avenue, Suite 1200 San Diego, CA 92101

Re: <u>El Camino Real Bridge/Road Project</u>

Dear Mr. Leja :

We represent Mr. Michael Mosley, owner of Mary's Tack and Feed on Via de la Valle in San Diego. We are writing in response to Mr. Marsden's email of June 19, 2006 requesting a letter supporting or opposing the various design choices for the realignment of El Camino Real. At this point, Mr. Mosley remains in favor of the eastern alignment, and opposes the western or central alignments for the street.

It is our understanding that the western and central alignments will require additional dedication and/or improvement of land adjacent to Mary's Tack and Feed. Such alignment and improvements are detrimental to Mr. Mosley's continued use of the property and his long range plans for development. The existing topography and development on the site, as well as the shared access driveway, dictate that any expansion or remodel of the existing use must take place in the same area proposed for street dedication and/or improvement. In addition, any reduction in size of the current site will negatively impact customer parking and access for the delivery of goods for sale.

Mr. Mosley needs all of the existing site to maintain and grow the existing successful business. Every week, 4 to 6 large trucks deliver merchandise to the site. If the western or central alignment is chosen, these trucks will have no place to stop and unload without impacting the existing parking area and access to the property next door. The existing truck turnaround will also be effectively destroyed. Encroachment into the existing parking area will also have a detrimental impact on business. Many of Mr. Mosley's customers drive onto the site in trucks, often towing horse trailers. Past experience with construction has shown that customers will not go out of their way to find off-site parking and will patronize other stores if convenient parking is unavailable, or if access to the site is hindered by construction materials. This problem is made

945 Fourth Avenue, San Diego, California 92101

[170203v1/5408-002] Telephone 619-233-1888 • Facsimile 619-696-9476 • www.wertzmcdade.com

Richard Leja, Sr. Civil Engineer October 2, 2006 Page 2

even more serious due to the impending widening of Via de la Valle. A two to three year project immediately adjacent to the store will very likely force Mr. Mosley to close his business and lay off 50 employees.

The western and central alignments also present problems with access and traffic on both El Camino Real and Via de la Valle. These alignments require the placement of a median along the existing portion of El Camino Real which will require all users of the shared driveway to exit the site to the south. We believe that this median will create a traffic safety hazard by forcing any driver wishing to exit north, east, or west to perform an illegal u-turn to gain access to Via de la Valle. The eastern alignment creates a frontage road access for Mary's Tack and Feed with a required southeasterly exit from the property to the El Camino Real and Via de la Valle intersection. The eastern alternative's service road approach eliminates the opportunity for a u-turns across traffic, and the new alignment with Via de la Valle Place improves traffic flow along Via de la Valle through a single signalized intersection.

Given the conditions described above, Mr. Mosley remains in favor of the eastern alignment and opposed to the western and central alignments. Please call me if you have any additional questions.

Very truly yours,

Robert A. Vacchi

K.

LAWYERS



IPAI

San Pasqual Band of Diegueño Mission Indians of California

SAN PASQUAL RESERVATION

TRIBAL COUNCIL

Allen E. Lawson Chairman

Rudy Contreras Vice-Chairman

Angela Martinez-McNeal Secretary-Treasurer

Re: Project No. 2982, North City Future Urbanizing Area

The City of San Diego Development Services Center

Dear Ms. Clark:

October 9, 2006

1222 First Avenue, MS 501 San Diego, CA 92101

Donna Clark

Jerald Cope Delegate

David Toler Delegate In regards to your letter dated September 7, 2006, please be advised that the San Pasqual Band of Mission Indians considers this area as Kumeyaay ancestral territory. As always we are concerned with the disturbance of remaining cultural properties.

As this time we do not know of any sacred or sensitive sites at the proposed project site. Should you discover any funerary items or cultural remains please inform our offices, as they may include our ancestors.

Sincerely,

Rual h Jol

David L. Toler Councilman

P.O. Box 365 • 27458 N. LAKE WOHLFORD RD., VALLEY CENTER, CA 92082 PHONE 760-749-3200 • FAX 760-749-3876 • WWW.SANPASQUALINDIANS.ORG

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City of Del Mar

1050 Camino Del Mar • Del Mar, California 92014-2698

October 9, 2006

Donna Clark, Environmental Planner City of San Diego Development Services Center 1222 First Avenue, MS 501 San Diego, CA 92101

Re: Draft Environmental Impact Report (DEIR) for JO: 119733 El Camino Real Road/Bridge Widening Project

Dear Ms. Clark;

On behalf of the Del Mar City Council, I am forwarding the City's comments regarding the DEIR for the El Camino Real Road/Bridge Widening Project. As you are aware, the City of Del Mar has been a partner in the efforts to restore the San Dieguito Lagoon for more than two decades. Many years of environmental, hydrological, grading and design work have gone into that project to make sure that it adequately restores the lagoon habitat. The Restoration Project has been worked on and reviewed by numerous jurisdictions, as well as the resource agencies, the San Dieguito River Valley JPA and Southern California Edison to ensure that the project design and hydrology work correctly to accomplish the goal of restoration of the San Dieguito Lagoon.

We understand that the El Camino Real Road/Bridge Widening project is necessary to accommodate the current and future traffic needs in the area, however, we are very concerned that the City of San Diego include the appropriate mitigation measures in the project design to ensure the following: 1) that there be no significant impacts to the habitat in the San Dieguito River Valley, 2) that the project grading and design hydrology not negatively impact the upcoming Lagoon Enhancement project, and 3) that the visual quality of the views of the Lagoon and River Valley will not be significantly compromised.

To that end, Del Mar submits the following comments on the DEIR for the El Camino Real Road/Bridge widening project:

3.1 Land Use

3.1.1.1 Planned Land Uses Per Planning Documents.

The matrix identifies key goals and guidelines from each of the existing Land Use (LU) documents that govern the area. In response to all LU documents the matrix glosses over the goals for retaining the visual quality and natural scenic character of the area by proposing small fixes such as additional landscape or selections for treatments on the bridge rails. The impact to visual/aesthetics being proposed in the preferred Eastern Alignment Alternative would be significant in that this alternative proposes to build a new bridge east of the existing bridge and leave the current bridge in place. The reason being given for leaving the current bridge is

Donna Clark, Environmental Planner City of San Diego DEIR El Camino Real Road/Bridge Widening Page 2 of 5

so it can be used for pedestrian, equestrians and bicycles. If the preferred alternative goes forward, alternative designs for accomplishing these trails should be explored rather than having two bridges at this location over the river. The current bridge should be removed and the habitat restored.

<u>3.2 Traffic</u>

The City of Del Mar has concerns for any alternative that would decrease the overflow parking currently being used at Horsepark by the Fairgrounds during the Fair and Race seasons. We feel that the removal of 70 spaces at Horsepark will be a significant impact to the City of Del Mar and the surrounding areas during the Fair and Race seasons, and alternative overflow parking should be identified and required.

How is "substantial reduction" defined in regard to the reduction of parking spaces? For the Western Alignment Alternative, an estimated 70 parking spaces, or 17% of the existing parking spaces, would be eliminated at Horsepark.

Although the parking spaces at Horsepark are not striped for parking, nevertheless, this is being used as parking for Horsepark and more importantly to the City of Del Mar, for overflow parking for the Del Mar Fairgrounds. Eliminating these 70 parking spaces (out of the 420 existing spaces) for the Western Alignment Alternative would not prevent the countless number of visitors who attend events at Horsepark and the Del Mar Fairgrounds from coming. Events at the Del Mar Fairgrounds directly impact traffic conditions for the City of Del Mar and surrounding areas. Eliminating 70 spaces without plans to provide alternative parking off-site would only worsen traffic conditions in the area.

3.3 Visual/Aesthetics

As noted in Section 3.1 above, the City of Del Mar is not only concerned about the visual impacts of the preferred Eastern Alignment alternative due to the fact that a new bridge is proposed and the current bridge is proposed to be retained, but that most of the alternatives propose bridge widths that exceed the widths necessary to provide adequate traffic lanes to reduce the LOS to a level below significance. It appears that there are other alternative designs that would accomplish the goal of improving the LOS while providing less visual impact to the San Dieguito River Valley. Some of those additional alternatives are being identified by the San Dieguito River Valley JPA in their comment letter which is supported by the City of Del Mar. Donna Clark, Environmental Planner City of San Diego DEIR El Camino Real Road/Bridge Widening Page 3 of 5

Additionally, view blockage as a result of the proposed bridge railings and the chain link fencing from the River Valley is significant and alternative designs need to be explored.

3.4 Historical

There is a concern that a historic expedition trail may be located in the project construction footprint. Section 3.4.3.2 on page 3.4-4 does not address the significance of the dirt road along the edge of the proposed triangular staging area (according to Figure 3.1-1 the dirt road appears to be within the right-of-way for El Camino Real and connects to Old ECR). This road may be a remnant of Portola's 1769 expedition but the EIR does not address this specifically. The concern is that this section may be the only remaining piece of this historic event and still retains some integrity. This information should be investigated and mitigation identified in the EIR if this is in fact correct.

3.7 Hydrology/Water Quality

San Dieguito Lagoon Enhancement Project

As noted in our letter, the City of Del Mar has been a partner in the efforts to restore the San Dieguito Lagoon for more than two decades. Many years of environmental, hydrological, grading and design work have gone into that project to make sure that it adequately restores the lagoon habitat. The Restoration Project has been worked on and reviewed by numerous jurisdictions, as well as the resource agencies, the San Dieguito River Valley JPA and Southern California Edison to ensure that the project design and hydrology work correctly to accomplish the goal of restoration of the San Dieguito Lagoon.

Appropriate mitigation measures must be included in the project design to ensure that there will be no significant impacts to the habitat in the San Dieguito River Valley and that the project grading and design hydrology will not impact the upcoming Lagoon Enhancement project.

Retaining the Existing Bridge

As noted above in Sections 3.1 and 3.3 the City of Del Mar has concerns that the preferred Eastern Alignment alternative proposes to leave the existing bridge in place and build a new bridge to the east of it. The EIR does not address the issue of floodwater trapping debris against the old bridge. The EIR actually states on Page 1 that there is not adequate room to pass debris under the existing bridge during flooding conditions. This needs to be addressed and mitigation proposed in the EIR.

Donna Clark, Environmental Planner City of San Diego DEIR El Camino Real Road/Bridge Widening Page 4 of 5

Increased velocities

Due to the age of the existing bridge, the increased velocity that will occur as a result of this project has the potential for causing damage to the existing bridge and needs to be addressed in the EIR and mitigation should be proposed.

The EIR does not address potential impacts on habitat in the river as a result of increased flow velocity. The Draft EIR and hydrology study state that 100-year velocities would <u>increase</u> in the river corridor from downstream of the existing bridge to upstream of the new bridge.

It is imperative that the hydrologic conditions that exist in the project area be studied so as to ensure that any changes due to the project will not significantly impact the existing clapper rail population. It has not been made clear in the EIR that increasing the velocities of the flow will not negatively impact the population.

3.12 Biological

The City of Del Mar is very concerned that the habitat and wildlife species in the River Valley be protected as much as possible from negative impacts. The EIR does not discuss whether the preferred alternative for building a new bridge while retaining the old bridge will impact the wildlife corridor by adding further obstructions to wildlife movement. The document does state that the new bridge will improve the function of the wildlife corridor (pages 3.12-47 and 3.12-49, #4), but it does not address the possible obstruction caused by the existing bridge that will is located to the west of the newly proposed bridge. The new bridge will be considerably higher so as to facilitate wildlife movement underneath it, but the old bridge, being so much lower, may block the movement due to the collection of debris.

Clapper Rails

All of the proposed alternatives would significantly impact habitat for the clapper rail. Due to the significance of this population in the project area it is recommended that the proposed mitigations be implemented prior to the impacts occurring for the project. This will provide substitute habitat for the rails during the construction disturbance of the river corridor.

Additionally, the project and mitigation sites should both be incorporated into a long-term monitoring program and the project should be required to implement or contribute a fair share to establishing these areas as monitoring sites.

Donna Clark, Environmental Planner City of San Diego DEIR El Camino Real Road/Bridge Widening Page 5 of 5

The City of Del Mar appreciates the opportunity to comment on the Draft EIR and hopes that you will take into consideration our comments and require the appropriate mitigation measures be included in the EIR and ultimately in the project construction. If you have any questions, please do not hesitate to contact Linda S. Niles, at 858-755-9313 x155.

Sincerely,

cc:

Criptal Crawford

Crystal Crawford, Mayor

Members, Del Mar City Council Lauraine Brekke-Esparza, City Manager Linda S. Niles, Planning and Community Development Director Tim Finnell, 22nd District Agricultural Association Lee McEachern, California Coastal Commission

CARMEL VALLEY COMMUNITY PLANNING BOARD c/o MNA Consulting 427 "C" Street, Suite 308 San Diego, CA 92101 PH: 619/239-9877; FAX: 619/239-9878 www.cvcsd.com/groups/planning.html

October 10, 2006

Donna Clark, Environmental Planner City of San Diego Development Services Center 1222 First Avenue, MS 501 San Diego, CA 92101 DSDEAS@sandiego.gov

Subject: Comments on the Draft EIR (Project No. 2982):

EL CAMINO REAL ROAD/BRIDGE WIDENING PROJECT Coastal Development Permit/Site Development Permit To Widen El Camino Real Between San Dieguito Road and Via de la Valle, Replace the Existing Bridge Over the San Dieguito River, and to Widen Via de la Valle Between El Camino Real and El Camino Real North.

Dear Ms. Clark:

GENERAL COMMENTS ON PROJECT OBJECTIVES

The proposed road/bridge construction occurs at the northern gateway to Carmel Valley. Completion and impacts of project alternatives will forever alter the subregion. Its locale---the western San Dieguito River Valley---is extremely valued by the community for its semi-rural, lowdensity, and pastoral break from development assured when much of this area was approved for housing, retail, and commercial use.

We actively support the "San Dieguito River Park Concept Plan" (approved by the City Council 2006) and its goals to preserve and restore the wetlands and uplands of this unique setting.

We understand the objectives to raise the road above the 100-year flood level and to replace the existing bridge for seismic activity. We also understand City of San Diego policy to build roads and bridges for their maximum carrying capacity. <u>However, these goals must be balanced</u> with the equally important City and State (Coastal Act) policies which set this area as a priority for preservation, for open space values as well as for this area's role in the Multiple Species Conservation Program Plan (MSCP.)

We do not believe that the City's primary criterion for the preferred 4lane alternatives for this project is appropriate. A "design speed of 55 miles per hour" in the heart of the river valley, replete with wetlands and upland habitat and endangered species, and on a road that only conveys traffic to the complicated intersections, stoplights, and the County, 2lane continuation of Via de la Valle, is excessive.

September 14, 1999 and June 11, 2002, this Board wrote to Development Services in response to this proposal:

"Our major concerns aside from the obvious traffic circulation benefit are the design and function of the new road and bridge over the San Dieguito River Valley.

"The environmental review...should consider foremost the critical importance of the locale---the western San Dieguito River Valley.

"Equally important is the opportunity to promote the 'semi-rural quality of the river valley..."

"We recommend that the overall effect of the widened road, with its slopes and berms, landscaping, and paths, should be that of a naturally occurring landform...

"...as the North City has continued to urbanize, and proposals within the river valley have come and gone, accompanied by vociferous and vehement opposition, we have learned that the river valley is most valuable to people for its visual sweep, its 'pastoral' quality

"Such landscapes are rare in coastal San Diego.

"Ten years from now, this project should not look as though a roadway was engineered and built across the San Dieguito River Valley, but, rather, as though the road had historically followed the path of least resistance, along the top of a naturally occurring causeway, winding its way through stands of upland habitat." Given the high priority of our community to preserve its few remaining open space and natural areas, the Board submits its recommendations on the scope and accuracy of the DEIR:

ALTERNATIVES CONSIDERED MUST BE EXPANDED

"Conclusions", Project Summary [S-2 and S-3] and Project Description [2-2 and 2-3] delineate the six "build alternatives" considered to merit environmental review. All of the four-lane alternatives, including the City's preferred "Eastern Alignment Alternative", would vastly increase the bulk and scale of the road and bridge from their current 23-ft. (road) and 27-ft. (bridge) widths.

The "Eastern Alignment" (City's preferred) alternative would result in a road 340-ft. long, 94-ft. wide, with the total road width at 122 ft. It would be "5-10-ft. higher" than the current road [2-2] The proposed new bridge would be built diagonally approximately 50 ft. east of the existing bridge at the south end and approximately 90 ft. east of the existing bridge at the north end. It would be 354 ft. long [2-23], 14 ft. longer than the existing bridge. Height would be "5-10 ft." above the existing bridge. Even more troubling than these numbers provided in the DEIR are recent statements made by project planners that the new road and bridge actually would be 12' higher than the existing ones.

This alignment also includes retention of the current bridge for hiking, biking, and equestrian use. This is most puzzling, since the original aim of the project was to allow unimpeded flow during a 100-year flood. The DEIR states the current bridge does not allow for possible debris passage but does allow for 100-year floodwaters to pass. All build alternatives propose channel reconfiguration, which can be part of a current bridge alternative, thus removing one justification for the "Eastern Alignment" (City's preferred.)

The DEIR provides excellent <u>visual simulations of the 4-lane alternatives</u> [Figure 3.3-7]. <u>These show, by design and by magnitude, that what is</u> proposed completely contradicts the Board's and community's requests in 1999 and 2002 for a bridge and road improvement that simulate "a naturally occurring landform...as though the road had followed the path of least resistance, along the top of a naturally occurring causeway..."

California Environmental Quality Act (CEQA) Guidelines state that an EIR "shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation."

The DEIR does not evaluate other alternatives that would have less impact on the river valley and environs while also improving circulation. Because we believe the 4-lane alternatives and bridge proposed are too massive, and because they are justified in the DEIR to provide 55 miles per hour travel capacity, we have worked with San Dieguito River Park Citizen's Advisory Committee and staff to provide two new alternatives which should be analyzed. Both of these alternatives would achieve the project goal of improving seismic protection and raising El Camino Real above the 100-year flood level. Both would include an undercrossing for equestrian use and connections from the south part of the river valley for all trail use.

• <u>"Modified Central Alignment" Alternative</u>

• "Modified Current Road/Bridge" Alternative

"Modified Central Alignment"

The "Central Alignment" described [Summary 2; S-3;2-2-5] and shown in "Visual Simulation 4" [figure 3.3-7] would feature:

.pedestrian walkway/parkway	22 ft.
.bicycle lane	8 ft.
.outside travel lane	12 ft.
inside travel lane	12 ft.
.median (solid, raised)	14 ft.
.inside travel lane	12 ft.
.outside travel lane	12 ft.
.bicycle lane	8 ft.
.pedestrian walkway/parkway	22 ft.
Total width	122 ft.

A modified version of the above would replace the old bridge and roadway with new structures in the same location as the "Central Alignment" described in the DEIR. However, the "Modified Central Alignment" would: (1) remove two travel lanes; (2) include 8-ft. bike lanes on both sides; (3) include a 6- to 10-ft. wide landscaped median, (4) include a 13ft. wide pedestrian/equestrian lane on the west side, and (5) include a 5ft. wide pedestrian walkway on the east side, reducing the width by nearly half.

Intersection improvements would vastly improve LOS conditions: extending the right-turn only lane from northbound El Camino Real onto Via de la Valle and the same onto San Dieguito Rd, and the possible use of roundabouts at some or all of the intersections. Options to improve access to and from the Polo Fields and Horsepark could include roundabouts or right-turn only improvements. Via de la Valle between El Camino Real and El Camino Real North can accommodate a fulllength third middle lane for turning south and north, with "keep clear" cuts for De Valle Place and the office complex. The Via de la Valle to El Camino Real south right turn lane also can be lengthened with minimal impacts to businesses at the intersection.

The "Modified Central Alignment" also would provide access to the Coast to Crest Trail via the 13-ft. pedestrian/equestrian lane (the equestrian portion would exist only on the bridge itself, ending at the trail) and pedestrian traffic would continue on the road. The 5-ft. wide pedestrian lane on the east side would be separated from all other traffic. Additionally, a ramp on the west side of the bridge, similar to those recently built on Highway 101 just south of Del Mar, would provide the vital connections to the equestrian/pedestrian trails in and around Gonzales Canyon and the MHPA to the east and south.

A particular advantage of this alternative is that the 1 foot of "intrusion into Horsepark Property" (state of California) [3.1-52] projected for the DEIR "Central Alignment" could be eliminated.

"Modified Current Road/Bridge "

The existing road and bridge would be modified to accomplish seismic safety and 100-year flood conditions by retrofitting, which would increase the depth of the existing piers and by increasing the slope ratios from 2:1 to 1.5:1. This would improve flow capacity.

This design would incorporate bike, pedestrian, and equestrian lanes, cantilevered over the slopes. Cantilevers would be built on both sides of the existing bridge to accommodate bikes and pedestrians on the east side and equestrians and pedestrians on the west side.

The same intersection improvements suggested in the "Modified Central Alignment" would be included.

5

SPECIFIC COMMENTS ON THE ACCURACY AND SCOPE OF THE DEIR

<u>Overview</u>

We believe that, in addition to the error of defining only a major, 4-lane roadway 122-ft. wide as acceptable, the DEIR is considerably flawed in its selective use of CEQA guidelines. With few exceptions, the CEQA categories analyzed focus on the traffic-carrying capacity of the system. In each section analyzed by us below, we cite only some of the many instances in which alternatives are shown as having CEQA impacts only if they do not improve traffic flow.

For example, "Mandatory CEQA Discussion Areas...Traffic Circulation" [4-2] states that the "Road Capacity Alternative would have significant and unmitigable impacts under CEQA for an increase in hazards to pedestrians and bicyclists, for long-term operations (LOS F)...In addition, the Central Alignment, Western Alignment, and Lower Elevation alternatives would have significant impacts under CEQA for long-term operations due to LOS E level of delay at the intersection of El Camino Real and Via de la Valle in the 2030 AM and PM peak hour."

Treated only minimally are environmental impacts. "Visual/Aesthetics", is described as: "All build alternatives except the Eastern Alignment would have view impacts that would be significant and unmitigable under CEQA from blocking a view corridor...due to the fencing needed on the outside of the cantilever equestrian trail on the west side of the bridge." In fact, cantilevered trails can be fenced with vertical pickets rather than chain link, preventing view blockage.

Visual impacts should be the same for all alternatives and significance should be based on the overall and significant visual impacts wrought by the creation of a large, 122-ft. roadway that, as proposed, looks like a industrial levee or big-city train trestle visible throughout the river valley.

<u>Comments on "Project Summary" and on "Section 1---Introduction and</u> <u>Environmental Setting"</u>

Here and throughout the DEIR, the western San Dieguito River Valley is mischaracterized as an increasingly urbanized setting; therefore, the 4lane road and bridge designs are not seen as impacts. Cumulative Effects [4-3] describes the western river valley as an area where projects being built reflect a "trend toward creating views of urban development."

The reality experienced by residents and commuters daily is that more than 600 acres of land here previously zoned for development, from I-5 to east of El Camino Real has, in just ten years, been acquired as open space. This is testimony to the uniqueness and value of this setting, one of the last of its kind in California. This has been accomplished because of the express and primary goal of the City, County, the State of California, communities, and conservation organizations to actively preserve the wetland/upland complex of the river valley.

Regarding consistency with the City's "North City Local Coastal Program Plan" the goal is to *"Preserve floodplains and significant topographic features such as canyons, ridges, and hillsides."* The 4-lane build alternatives "(do) not propose new development in the floodplain because the widened road and new bridge would be constructed in the same general corridor as the existing road and bridge." [3.1-15] <u>Replacing the current road (23-ft.wide) and bridge (27-ft.wide) with a 12-ft. higher and 122-ft. wide system is not seen to introduce a major structural intrusion into this natural setting.</u>

Similarly, because "El Camino Real and Via de la Valle are not identified as existing or proposed scenic routes." [3.1-7] the General Plan goal for roads to "emphasize aesthetics and noise reduction" is not an issue. Clearly the important role of the river valley as habitat and open space offering wide vistas as breaks from development is minimized in the DEIR.

Comments on Section 3----"Land Use"

The DEIR vastly underestimates the impacts of the fully-widened alternatives on the western river valley. The serenity of the river valley would be destroyed with the proposal to spend \$24 million on a new 122ft. wide road and bridge that would only marginally improve traveling speed at the intersection of El Camino Real and Via de la Valle---from LOS F to LOS D at the P.M. peak. Travel along El Camino Real at today's conditions, is slowed only at peak hours.

However, the 4-lane build alternatives, as described below in text indicating consistency with established land use plans, are seen only in the context of their ability to move traffic faster through this area:

Table 3.1-2, "Project Consistency with the...General Plan Transportation Element" states the primary goal for *"A transportation system that is safe*,

functional, efficient, environmentally acceptable, and aesthetically pleasing." All alternatives except the smaller or no build ones are seen to meet this goal. Similarly, the goal to have "a street and highway system whose components are consistent with the character of the area traversed and suitable for the type and volume of traffic served" is seen to be met for the simple reason that "all (larger) alternatives would provide 4 travel lanes." (emphasis added)

Both findings clearly emphasize the increase in road capacity and ignore the goal texts emphasizing *"environmentally acceptable and aesthetically pleasing"* and *"consistent with the character of the area traversed."*

The transportation goal to "Respect the natural environment and scenic character of the area traversed" is judged to be met by all alternatives because trees, shrubs, and plants would be planted on manufactured slopes.

<u>Project Consistency with the General Plan Open Space Element [3.1-7]</u> refers to the goal of "The installation of public and private improvements in designated open space areas <u>should respect the natural environment to</u> <u>the maximum extent possible.</u>" (emphasis added) Again, the bulk and scale of the proposed 4-lane, 122-144-ft. wide alternatives are not seen as an impact on the western river valley.

The DEIR discussion of Project Consistency with Other Policies/Plans [3.1-33 – 3.1-47] continues this theme. The "NCFUA Framework Plan established that "Within the 100-year floodplain fringe of the San Dieguito River Valley, fill for roads...will be permitted only if such development is consistent with the policies detailed in the North City Local Coastal Program Plan whose goal [3.1-15] is to "preserve floodplains..."

In these and numerous other places in the DEIR the build alternatives are seen as having a neutral impact on the river valley because a road and a bridge already exist in this location.

In our view, the critical goals to not impose new development and visual and structural impediments in a mostly natural setting are ignored.

Section 3.1.3.4, "Conflict with Environmental Plans or Policies" should be revised to reflect the San Diego City Council acceptance of the "San Dieguito River Park Concept Plan" (2006.) The Concept Plan is merely described as "prepared to formally establish the vision and goals for the future use of the...river valley." The EIR should better describe the plan's goals: only the goals for the "floodplain" and "conservation" are listed. The EIR should emphasize the major Concept Plan goal for "Special Design Considerations" for this area [p. 41]:

"Due to the special characteristics within the Del Mar Coastal Lagoon Landscape Unit...

.the sweeping open space views within this landscape should be protected.

.future development should be compatible with the open space character of the lagoon area in terms of both visual compatibility and intensity of use.

.view opportunities of the lagoon and ocean from trails and existing circulation routes should be preserved and, where appropriate, enhanced."

Comments on "Traffic Circulation" [3.2-1 – Figure 3.2-6]

Justification for the road/bridge widening includes "The Series 10 Long-Range (2030) modeling of traffic volume projections..."

Section 3.2.2.2 describes "Existing Traffic Volumes and Levels of Service." Noting that the current road segments except for El Camino Real North operate at LOS F, the DEIR takes as its basis existing traffic volumes "obtained by counts conducted in July 2003."

Since July 2003 much new development has occurred both in the immediate Carmel Valley area and Pacific Highlands Ranch vicinity, as well as in the large developments to the east and south---Torrey Highlands; Del Mar Mesa; Camino Del Sur, etc. All of these developments would feed traffic into the project area, so, presumably, the traffic counts would be much higher today than in 2003. <u>The proposed increase over today's traffic may be significantly less than the increase from 17,000 to 28,000 ADT depicted.</u>

The final EIR should thoroughly analyze the difference between traffic volumes counted in 2003 and in 2006.

<u>Comments on Visual/Aesthetics</u> [3.3-1 – Figure 3.3-15]

Although the DEIR, commendably, treats potential visual and aesthetics impacts with detail, we cannot agree with the DEIR conclusions that the impacts of the City's proposed 4-lane alternatives---especially the City's preferred Eastern Alternative---are benign. "Visual Simulation #3" [Figure 3.3-6] compares the proposed, 12-ft. higher, 94-ft.-wide bridge with the current, 27-ft. one. Although aesthetics and visual quality are somewhat subjective, no one of us reviewing this project and seeing this visual simulation can agree with the DEIR conclusion that: "the overall visual quality and character remains the same...Though some views to the east would be blocked by the development of the new bridge, these views were limited to road drivers that would be traveling on the new bridge with increased views to the east and west."

The visual simulations also well represent a design flaw, in our view. The box girder bridge design simply is not compatible with the aesthetics goals of the river valley park. The existing bridge with arched underpinnings and a less massive appearance is far more pleasing and consistent with the early California feel of the river valley. The design proposed here, with its 12-ft. "apron" would be at home in an industrial or a downtown setting, or an open freeway setting but is inappropriate in the historic El Camino Real.

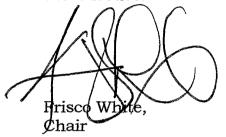
Comments on "Biological Resources" [3.12-1]

"The Natural Environment Study Report for the El Camino Real Road/Bridge Widening Project" included by reference in the DEIR states that this project will not include a wildlife undercrossing because the project is north of the existing culvert. A wildlife undercrossing is required by MHPA guidelines and, although this project is north of the existing box culvert, this proposal would significantly impact wildlife and habitat in the MHPA and river valley. Loss of habitat would occur with any of the build alternatives, and, to a lesser extent, with our suggested 2-lane-plus alternatives, as well. An undercrossing at El Camino Real is now a City of San Diego CIP project, although only the engineering and application processing are now funded. Therefore, it seems appropriate that this road and bridge project contribute to this undercrossing, given project impacts that will further limit and/or destroy wildlife access to nests, homes, and food.

SUMMARY

The DEIR does not reflect the reality of the western San Dieguito River Valley and its environs. The "trend toward urbanization" used to justify a new road and bridge of large proportions has been reversed through local, state, and conservation efforts. Environmental review of any proposed road or other improvements in this area should thoroughly underscore the threats to this rare environment, one so important to surrounding communities and so critical to wildlife, interconnected corridors which support this wildlife, and to unique vegetation nearly depleted in this City and County.

A final EIR on a project to improve travel on El Camino Real must reflect these issues.



Jan Fuchs/Anne Harvey, Co-Chairs Regional Issues Subcommittee

Cc: Council President, Scott Peters Jim Waring, Mayor's Office Bernard Turgeon, Senior Planner San Dieguito River Valley Joint Powers Authority

SAN DIEGUITO PLANNING GROUP P.O. Box 2789, Rancho Santa Fe, CA 92067

October 12, 2006

Ms. Donna Clark Environmental Planner City of San Diego Development Services Center 1222 First Avenue, MS 501 San Diego, CA 92101

RE: Draft Environmental Impact Report – JO 119733 El Camino Real Road / Bridge Widening Project

Dear Ms. Clark:

The San Dieguito Planning Group (SDPG) of the County of San Diego appreciates having the opportunity to respond to the Draft EIR for the El Camino Real Road / Bridge Widening Project.

After review and discussion at our Public Meeting October 12, 2006 the SDPG requests that the City of San Diego staff reconsider the options proposed in the EIR and add several alternatives. This expanded analysis of the concept should include the following items:

- Keeping El Camino Real and the bridge across the San Dieguito River at the current 2 lane configuration (one lane each way) to support the rural character found in this area and to preserve the scenic beauty of the proposed River Park which it transects.
- Rebuild the aging bridge in the same configuration as it is currently found with the same placement. In its new rebuilt form additional space can be added to support equestrian, pedestrian and bike user pathways to support use by the River Park.
- Evaluate placing round-abouts at the intersections on Via de la Valle instead of the current stop light configuration. In the near-term this configuration will facilitate improved traffic flow and in the long-term the additional land acquired for the round-abouts will facilitate any increased capacity changes required.

The San Dieguito Planning Group would like to request that one key aspect of the study be enhanced, namely the review of the effects of restricting the flow of water during the 100 year flood with the new proposed raised road bed and bridge and the effects upstream on the surrounding areas in both the City of San Diego and the Unincorporated areas in the County of San Diego. We are concerned that 100 year flood water restrained up stream behind this new configuration could move water up into areas, with homes, normally not considered part of the active flood plain simply because of the volume of water moving toward the ocean backing up behind the road bed and bridge as currently proposed. The San Dieguito River Valley has been flooded side to side several times in the collective memory of the SDPG members. Consider too that in this same time frame we have not yet experienced the 100 year flood. Homes in the areas of Sun Valley,

SAN DIEGUITO PLANNING GROUP P.O. Box 2789, Rancho Santa Fe, CA 92067

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Fairbanks Ranch, Whispering Palms and the new residential construction in the El Apajo area could be severely impacted by water seeking a path to the ocean, restrained by the proposed configuration of road and bridge. The Planning Group requests City Staff to conduct an in depth review of the river valley at several locations including sites in the Sun Valley area, at the Fairbanks Country Club, at Morgan' Run, at the proposed El Apajo Bridge and at Chino's Farm relative to the elevation of the new raised El Camino Real road bed.

We request your hydrology consultant consider further the impact of having additional, restrained water, caused by the new road and bridge configuration, added in on top of the normal flow from the 100 year flood event and its potential impact on areas up stream. We are concerned that projects and homes have been approved and built in the areas potentially impacted. Steps need to be taken to mitigate the impact on these homes now, before the major flood event finally arrives.

Thank you for your consideration.

Sincerely

Paul Marks, Chair San Dieguito Planning Group



Santa Fe Irrigation District P.O. Box 409 • Rancho Santa Fe, CA 92067-0409

October 15, 2006

Donna Clark, Environmental Planner City of San Diego Developmental Services Center 1222 First Avenue, MS 501 San Diego, CA 92101

RE: Project No. 2982, SCH No. 1999071104

Dear Donna;

The Santa Fe Irrigation District has received a copy of the draft Environmental Impact Report JO. 119733 for the proposed EL CAMINO REAL ROAD/BRIDGE WIDENING PROJECT. The District has reviewed the document and offers the following comments:

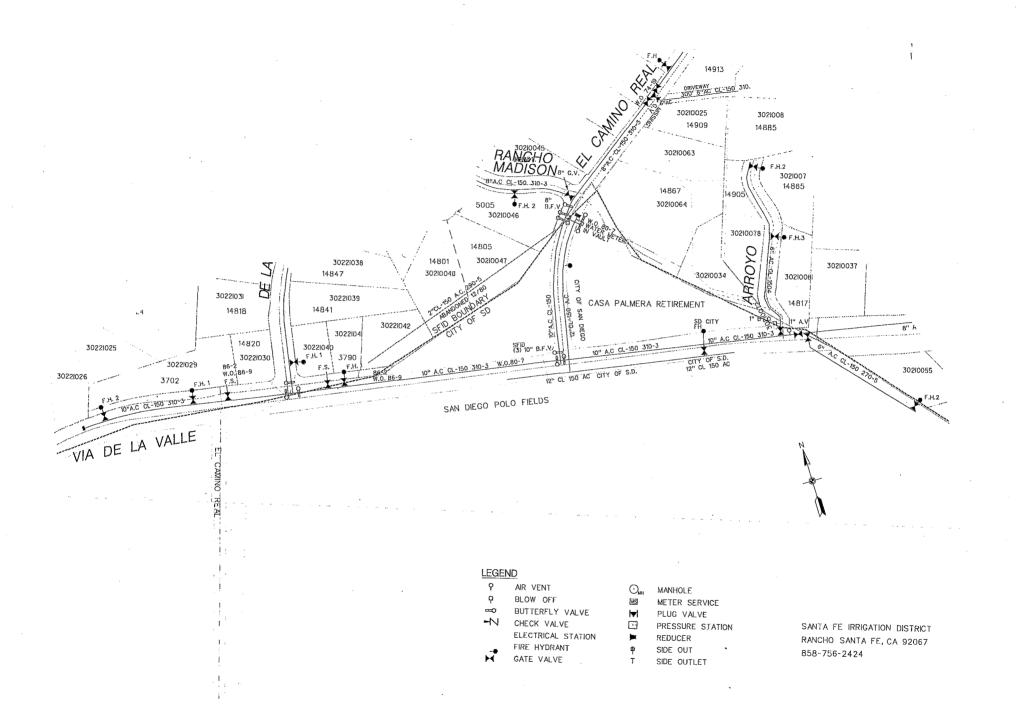
- 1. The District has an existing 10" ac waterline in Via de la Valle between El Camino Real North to about 500 feet west of the intersection of Via de la Valle and El Camino Real South (see attachment). This serves the commercial area on the north side of Via de la Valle as well as Mary's' Tack Shop and the All Creatures Animal Hospital. We serve fire protection for those areas. This line was install in about 1980 and does not need to be replaced. The commercial area at Via de la Valle Place is actually in our District. This was not identified in Section 3.6.2.1 Existing Public Utilities and nor Section 3.6.3.1 Issue 1 Impacts on Public Utilities/Services during construction.
- 2. Section 2.2.1 identifies the replacement of an existing corrugated metal storm drain that runs under Via de la Valle at El Camino Real North would be replaced with a concrete box sized to pass a 100-year flood from upstream. The District needs to be involved in this process to insure that our facilities are protected in place. Should our 10 inch water line be in conflict, the District assumes that it will be relocated within the cost of this project.
- 3. The District is currently working on its Integrated Water Resources Plan (IRWP) which will include evaluating the development of a recycled water and raw water system to serve customers as an alternative irrigation system. Since the IWRP will not be complete by October 22, the District will not have evaluated if customers in this area would qualify for recycled water or raw water. Should this area become a potential site for one of the two new systems, the District would be interested in installing the new system in connection with the project.

All correspondence to the District should be addressed to:

Dana Johnson, Engineering Manager Santa Fe Irrigation District P.O. Box 409 Rancho Santa Fe, Ca 92067-0409 858-756-2424 858-756-0450 fax 858-414-9978 cell djohnson@sfidwater.org

Sincerely, mar

Dana Johnson Engineering Manager





SAN DIEGO AUDUBON SOCIETY

4891 Pacific Highway, Suite 112 • San Diego CA 92110 • 619/682-7200

October 17, 2006

Donna Clark City of San Diego Development Services Center 1222 First Avenue, MS 501 San Diego, CA 92101

Re: Project #2982 - El Camino Real Road/Bridge Widening

Dear Ms. Clark:

Thank you for the opportunity to comment on the proposed widening of El Camino Real (Project Number 2982). The San Diego Audubon Society (SDAS) fosters the protection of birds and other wildlife through education, study and advocacy and supports the preservation of native habitats throughout San Diego County.

SDAS is opposed to this project because of its potential impact on a large clapper rail population in the immediate vicinity and the effect of the wider road on the view and character in this scenic, already highly developed portion of the San Dieguito River Park. We would further like to make the following comments:

In the draft EIR, the City fails to adequately address both the significance of the third-largest population of clapper rails, a federally-listed species, residing in the area under and immediately adjacent to the existing El Camino Real bridge and the likelihood that any disturbance in this area will disperse that population, probably permanently. Clapper rails are year-round residents, already constrained to small pockets of productive wetlands with suitable vegetation for cover. For this reason, it is highly unlikely they will find similar habitat anywhere near the current location. The San Dieguito Lagoon restoration project cannot be counted on to provide suitable clapper rail habitat for a great many years under the best scenario, and the perilous condition of the species makes the proposed impacts to this population, in SDAS' opinion, unmitigable. If any variant of the proposed project does go forward, however, the City should complete mitigation for the impacts to clapper rail habitat long enough before construction that the replacement habitat has fully matured and is well occupied by clapper rails before any disturbance to the existing habitat is allowed.

An urban thoroughfare of the proposed scale is neither suitable for the current location nor will it maintain the open, semi-rural character of this section of the San Dieguito River Park. The route already crosses an area of sensitive biological resources and scenic beauty in the most heavily populated part of the Park. This is even more reason to maintain the natural character of the viewshed for the benefit of local residents and the thousands of travelers who have the chance to gaze on the soon to be restored lagoon as they pass by on the I-5 freeway. Nearly \$100 million is being spent to restore the Lagoon as a functioning wetland; the proposed widening would be an unnecessary blight on this effort.

Discussions with the City revealed that the original impetus for this project was the need to modify the current bridge to meet 100-year flood standards. The subsequent additions to the project to improve traffic flow on El Camino Real and Via de la Valle – an already heavily contested proposal – are unrelated and unjustified. Instead, the proposed widening will facilitate urbanization, bringing with it the associated problems of air pollution due to increased vehicular emissions, degradation of water quality due to contaminated runoff, trash, and noise. This is not only contrary to the less congested character of the area but also to the River Park plan to preserve natural habitat areas for the protection of native species and the enjoyment of nature enthusiasts.

At a time when the City can ill afford to waste financial resources, we strongly suggest the City revisit its circulation plan and take into consideration changes that have taken place over the past two decades, particularly the establishment of the San Dieguito River Park. The Lagoon area is already developed beyond what is compatible with a natural river park. We request that an Environmental Impact Report be prepared with alternatives for modifying the existing bridge to meet flood control requirements without further compromising the value of this natural corridor. We also urge City planners to better coordinate with San Dieguito River Park staff in designing bike paths that are suitable for commuters separate from the roadways in the lagoon area, to lessen the need for wider roads and improve bicyclists' safety.

Please feel free to contact me at (619) 224-4591 if you have questions regarding this comment letter.

Respectfully,

James A. Peugh

Chair, Conservation Committee

CC:

Carolyn Lieberman, US Fish and Wildlife Service Elizabeth Lucas, California Department of Fish and Game Terry Dean, Army Corps of Engineers Bruce Posthumus, Regional Water Quality Control Board

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Peter B. Smith Association Manager

October 19, 2006

Rancho Santa Fe Association Post Office Box A • Rancho Santa Fe, CA 92067-0359. (858) 756-1174 • FAX (858) 756-9814

www.rsfassociation.org

Mark McClure, President Diane Larsen, Vice President Jack Queen, Secretary Gail Frazar Ken Markstein

> Robert I. Green **Building Commissioner**

Ms. Donna Clark, Environmental Planner City of San Diego Developmental Services Center 1222 First Ave., MS 501 San Diego, CA 92101

DEIR JO: 119733 - Proposed El Camino Real Bridge & Roadway Expansion & Re: **Re-Alignment**

Dear Ms. Clark:

The Rancho Santa Fe Association is opposed to the new bridge, road expansion and realignment proposed for El Camino Real within the San Dieguito River Valley. The EIR has failed to consider viable alternatives, including the establishment of roundabouts at the intersections of Via de la Valle/El Camino Real and San Dieguito Road/El Camino Real, as a far less intrusive and effective method for increasing capacity, enhancing safety and protecting environmental and aesthetic values.

As with the plan to expand the adjacent Via de la Valle roadway segment (see enclosed letter), the proposal to widen EL Camino Real will merely create four lanes feeding into two lanes. A dubious benefit especially in light of the significant negative impacts to the preservation of the environmental/open space values associated with the San Dieguito River Park's "coast to crest" trail. Further, the EIR does not consider the ramifications of the San Diego County Board of Supervisors recent action to endorse the re-connection of El Apajo Road to Via de la Valle in the Circulation Element of the County's General Plan. This and the other numerous traffic, circulation, development and other material changes that have occurred in the area since the original plans to expand the roadway and build a new bridge were developed so many years ago, need to be accounted for in a new comprehensive traffic study. In light of the approved El Apajo re-connection and the roundabouts alternatives, what are the traffic circulation impacts on Rancho Santa Fe and surrounding areas with and without the project and with and without roundabouts and the re-connection of El Apajo Road to Via de la Valle?

The EIR needs to consider the cumulative effect of the project in conjunction with the proposed widening of Via de la Valle, and also the traffic impacts on Ranch roads which have not been assessed by the EIR. These are serious deficiencies.



Is there really a need and justification for such an expensive and intrusive project in such a sensitive area? In light of all the changes that have occurred subsequent to when the project was originally considered and proposed, a careful evaluation of all the issues, including all traffic circulation impacts and mitigations, need to re-assessed and fully disclosed. The Association joins with the other numerous groups, organizations and communities in opposing the proposed development and in questioning the adequacy of the EIR.

Thank you for the opportunity to comment on these issues.

Sincerely. Kenneth W King Jr.

President

Encl: Letter dated July 20, 2006

Cc: Supervisor Bill Horn Supervisor Pam Slater-Price Council President Peters Dick Bobertz, San Dieguito River Park Paul Marks, SDPG Dave Abrams, Fairbanks Ranch

BOARD OF DIRECTORS

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Kenneth W. King, Jr., President Stephen H. Heidel, Vice President Donna D. Ferrier, Treasurer Robert M. Spears Marie Addario Lois A. Jones Stephen Shillington

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(858) 756-1174 • FAX (858) 756-9814 www.rsfassociation.org Mark McClure, President Diane Larsen, Vice President Jack Queen, Secretary Gail Frazar Ken Markstein

> Robert J. Green Building Commissioner

July 20, 2006

Marilyn Mirrasoul Environmental Planner City of San Diego Development Services Center 1222 First Avenue, MS 501 San Diego, CA 92101

Re: Comments on Via de la Valle Street Widening Recirculated Mitigated Negative Declaration Project No. 12657, SCH No. 2005061089

Dear Ms. Mirrasoul:

The Rancho Santa Fe Association is opposed to the widening of Via de la Valle to four lanes between San Andres Drive and El Camino Real. This proposed widening is unnecessary and detrimental to the character of the community.

East of the proposed project site, Via de la Valle is classified as a two lane road on the County Circulation Element, and there are no plans or intentions for expansion now or in the future. The situation is likewise to the north with El Camino Real. Therefore, any widening of Via de la Valle within the City of San Diego adjacent to the County portion of the road will not ease the flow of traffic or increase overall roadway capacity. The resulting benefit to drivers would be minimal to nonexistent.

Widening Via de la Valle would also be detrimental to the rural character and the natural environment of the San Dieguito River Valley. Via de la Valle is identified as a "scenic drive" within the San Dieguito River Park, and is the gateway into the Rancho Santa Fe Covenant, where the narrow, rural, and winding character of the roadways is a major reason for the community's Cultural Landscape designation by the State of California in addition to its Historic Landmark status. Expanding Via de la Valle to a 4 lane road would suburbanize this corridor, destroying the character of the surrounding community.

In addition to the scenic and cultural reasons for maintaining the existing 2 lane roadway, Via de la Valle is immediately adjacent to the San Dieguito Lagoon restoration project. Any expansion of the roadway could potentially impact sensitive habitat and environmental resources.

ART JURY

For the above reasons, the Rancho Santa Fe Association strongly opposes the proposed widening of Via de la Valle, and urges that a full EIR analysis be conducted to determine the potential impacts of the project.

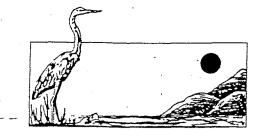
Thank you for your consideration of these comments. If you have any questions about the Association's positions, please contact me at (858) 756-1174.

Sincerely,

Kee Keith Behner

Planning Director

Cc: Supervisor Horn Supervisor Slater-Price Council President Peters Dick Bobertz, San Dieguito River Park Paul Marks, SDPG Arnold Torma, Katz-Okitsu and Assoc.



Friends of the San Dieguito River Valley

P. 0. Box 973 Del Mar CA 92014

October 19, 2006

Donna Clark, Environmental Planner Development Services Center City of San Diego 1222 First Avenue, MS 501 San Diego, CA 92101

SUBJECT: COMMENTS ON THE DRAFT EIR (Project No. 2982) EL CAMINO REAL ROAD/BRIDGE WIDENING PROJECT

The Friends have reviewed the draft EIR and respectfully submit the comments below. The Friends was established in 1986 as an incorporated volunteer citizens group to advocate for the preservation of the San Dieguito River Valley and have been involved since that time in providing community input.

GENERAL COMMENTS:

Although we understand the need to improve the existing El Camino Real Bridge, we are concerned that the draft EIR ignores and even mis-states regional efforts to preserve and, where possible, restore the open space-river valley environment in the area of the proposed project. In our opinion there are two glaring inaccuracies in the Draft:

1. The Report finds that city-owned property currently leased by the San Diego Polo Club is not public and therefore exempt from provisions of Section 4.10 (f) of the NCFUA Framework Plan which does not allow development to block public views. In fact the property leased by the Polo Club is preserved public open space (Fairbanks County Club Specific Plan, City of SanDiego, 1982; Fairbanks Country Club EIR, City of San Diego, 1982; the Corporation Grant Deed for the property, City of San Diego, 1983, and the Club's Lease Agreement with the City of San Diego, 1986). The current lease is set to expire in 2012. It is expected that this *temporary* lease will not be renewed and the property will no longer be limited to a "select group of paying

customers" (to quote the draft EIR). This inaccuracy in the Draft EIR must be corrected and related findings re-evaluated. For instance the finding (Section 4.3.4)

that all build alternatives *except* (emphasis ours) the Eastern Alignment Alternative have unmitigable impacts, must be re-evaluated because the Eastern Alignment does in fact block a significant public view. <u>Therefore, based on the City's own analysis, it appears</u> that ALL the alternatives have unmitigable impacts and new build alternatives must be developed.

2. The Report finds that the area "reflects a trend toward creating views of urban development" when in fact community groups and local governments, including the City of San Diego, have worked tirelessly over the past 20 years to secure private donations and public funds to acquire and preserve open space in this area. These acquisitions along with plans for restoring significant acreage to its natural habitat reflect a trend toward preserving views of the river valley open space (NOT views of urban development). Finally, the City of San Diego has adopted the San Dieguito River Park Concept Plan that calls for protecting "the sweeping open space views within this landscape" and assuring that "future development (is) compatible with the open space the lagoon area in terms of both visual compatibility and intensity of use" character of and "view opportunities of the lagoon and ocean from trails and existing ciruclation routes (are) preserved " The draft EIR does not give appropriate weight to these goals.

(In this regard, Table 4-1 Cumulative Projects should be corrected to include the 275 acres of permanent public open space provided in the Fairbanks Country Club Specific Plan and the acres rezoned to Open Space as part of the Villa Paraiso Project.)

SPECIFIC COMMENTS:

1. The Friends do not support retaining the old bridge AND constructing a second bridge. In fact we are puzzled that the Draft EIR identifies the project goal as providing seismic and flood protection (as well as protecting environmental goals) and then preceeds to identify a preferred alternative that keeps the (presumably unsafe) existing bridge in place and builds a second higher, wider and longer bridge. Doing so would appear to actually double the obstruction of water flow during flooding, as well as more than double the amount of structures in the River Valley viewshed. Additionally Simulation #3 (Eastern Alignment) shows that the new raised bridge/roadway would block an important public view corridor to the east from the existing bridge which is proposed to be used by nonvehicular traffic, i.e. the sight-seeing public.

Also, Simulation #3 seems at odds with the description of the preferred Eastern Alignment bridge as three feet (36-inches) higher than the existing bridge. In the simulation "a 42-inch high fence for pedestrian protection" appears to be much lower than the new bridge. How high is the bridge in the Eastern Alignment Alternative? It would be helpful to have the alternatives pictorially superimposed over the old bridge to clarify the actual heights and impact of the project on public views and the semi-rural character of the River Valley in the area of the proposed project.

2. Via de la Valle in the area of the proposed project IS identified as part of the San Dieguito River Park Scenic Drive in the River Park Concept Plan (Figure 3D, page 37) adopted by the City of San Diego. The statement in the Draft that "...Via de la Valle (is) not identified as (an) existing or proposed scenic drive is incorrect.

3. Whereever an alternative alignment takes away public open space, that loss must be replaced with comparable public open space in the area. For instance, this was not addressed in the Eastern Alignment analysis even though there would be a loss of public open space for a new right-of-way.

4. Re-evaluate the need for a new signalized intersection at the Horse Park entrance since it is likely the property currently leased to the Polo Club will become open to the public "at all times" for **non-commercial** uses as specified in the deed restrictions and Specific Plan. Further, a signalized traffic light would have a negative impact on the predominantly semi-rural use and feeling of the area.

UNRECOGNIZED HISTORICAL TRAIL

The Friends bring to your attention a specific area of possible historical value that is not considered in the Draft Report: a remnant of the oldest site in the River Valley, the trail of Gaspar de Portolà's 1769 expedition to create bases along the California coast. The remnant is located within the El Camino Real right of way at the southern end of the existing bridge at the exact location of the proposed project's staging area (Figure 3.1-1). We have attached specific information and photographs from our research, for your review. Assuming the written record confirms our findings it is essential to preserve this fragile vestige of a fabled road critical to the history of the region.

The following passage is in the diary of Juan Crespi, who accompanied de Portola:

"We pitched camp near a large pool of good fresh water, which the soldiers called Well of Ozuna, and which we called the valley of San Jacome de la Marca. As soon as we arrived, about 18 Indians came to visit us, with their women and children, all very affable and not at all noisy. It seems this place is near the sea, judging by our view of it aas we came down the valley. The hills that surround this valley are not very high, and all are of pure earth, covered with pasture, the only thing lacking to the site being trees."

MINOR CORRECTIONS: 1) Correct spelling to San Andres, not Andreas and 2) there is no Villages Stallions Crossing that we are aware of; there is the Villas at Stallions Crossing on El Camino Real.

SUMMARY:

The Draft describes the visual setting of the proposed project thusly: "The presence of open water, natural landforms and the distant ocean all combine to provide a high quality

visual setting unique in the San Diego region (Section 3.3.2.2)", but inexplicably concludes that "overall, the set of projects (in Table 4-1) evaluated indicate a trend toward creating views of urban development, including buildings, paving, and more visible structure..." As noted above, this conclusion is incorrect. Table 4-1 should be also be corrected to include the 275 acres currently leased to the Polo Club and the soonto-be-restored open space adjacent to the Villa Paraiso as "permanent Open Space", and the last sentence in the Cumulative Effects paragraph amended to reflect that in fact there is a trend to preserving the open space visual setting and restoring natural habitat in the area of the proposed project.

The preferred Eastern Alignment alternative would not only vastly increase the bulk and scale of the bridge-blocking views from the preserved public open space to the east - but would also significantly decrease natural habitat areas and leave the existing bridge considered an impediment during a 100-year flood and seismically unsafe - in place. We support the suggestion by both the San Dieguito River Park and the Carmel Valley Community Planning Board to modify the Central Alignment and Current Road/Bridge Alignment as more appropriate alternatives.

The Draft EIR is a very thorough and comprehensive document. We hope the City will respectfully consider our comments and, most importantly, work closely with both the River Park staff and the Community Planning Board in order to more clearly reflect the reality of this incomparable open space river valley.

Sincerely. Jacqueline Winterer, President

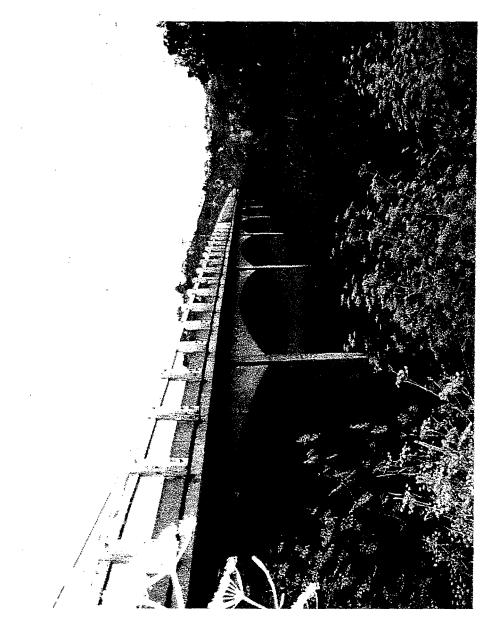
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Ann Gardner, Vice President

Attachments:

- 1. Report 1a EL CAMINO REAL prepared by the Friends of the San Dieguito River Valley, August 7, 2006
- 2. "Trying to save a slice of history," North Coast Times column by Peter Kaye, October 15, 2006
- 3. Figure No. 3D, Scenic Drive Alignment, San Dieguito River Park Concept Plan



Old El Camino Real

FSDRV Attachment

Old El Camino Real in the San Dieguito River Valley

Report 1a Prepared by the Friends of the San Dieguito River Valley 7 August 2006 The crossing of the San Dieguito River by El Camino Real is the oldest site in the whole of the San Dieguito River Valley for which there is a written record. It is imperative to preserve this fragile vestige of a fabled road critical to the history of the region. Unless efforts are made it will disappear.

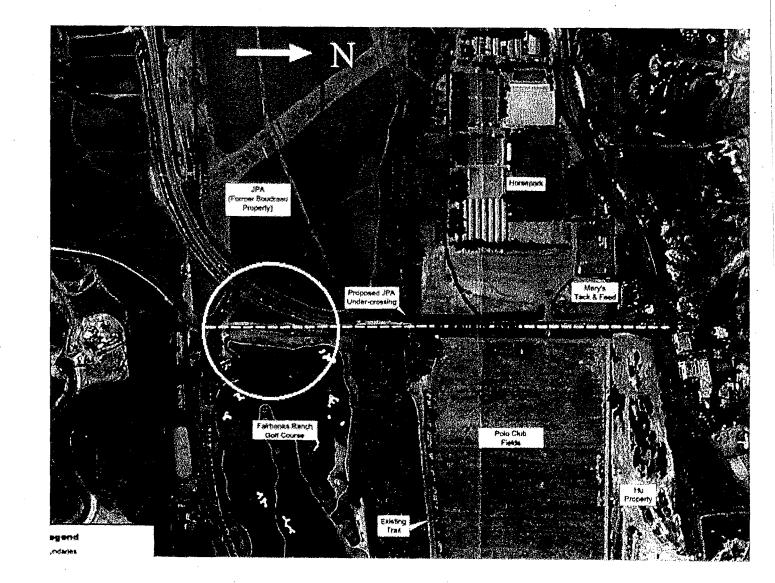
Gaspar de Portolá, a soldier in the Spanish army, was appointed Governor of Las Californias from 1768 to 1770. Starting in 1769, Portolá led an expedition to create bases along the California coast from San Diego to Monterey. His party of 63 left San Diego on July 14, 1776, 64 following age-old indian trails which eventually became the route of El Camino Real. The road, during its active life, was a carefully cleared trail which traversed the length of Southern California, connecting population centers, including misssions, and providing access to food, water and lodging for travelers.

The following passage in the diary of Father Crespi, who accompanied de Portolá, has been identified by Richard F. Pourade in *The Explorers* (1960) as a description of the San Dieguito Valley:

"We pitched camp near a large pool of good, fresh water, which the soldiers called Well of Ozuna, and which we called the valley of San Jacome de la Marca. As soon as we arrived, about 18 indians came to visit us, with their women and children, all very affable and not at all noisy. It seems that this place is near the sea, judging by our view of it as we came down the valley. The hills that surround this valley are not very high, and all are of pure earth, covered with pasture, the only thing lacking to the site being trees."

EIR 1-2

This photograph shows a small portion of El Camino Real on the western boundary of Fairbanks Ranch Golf Course. It is from map 1-2 of the El Camino Real Road Widening Project EIR (2006). This segment was abandoned when El Camino Real was relocated in the 1970s. It is a likely location of Portolá's El Camino Real,



PICT0247a

View towards the North from presently used, asphalt segment of Old El Camino Real, across San Dieguito Drive and continuing North on what is possibly a segment of the "ancient" El Camino Real, now a dirt road.

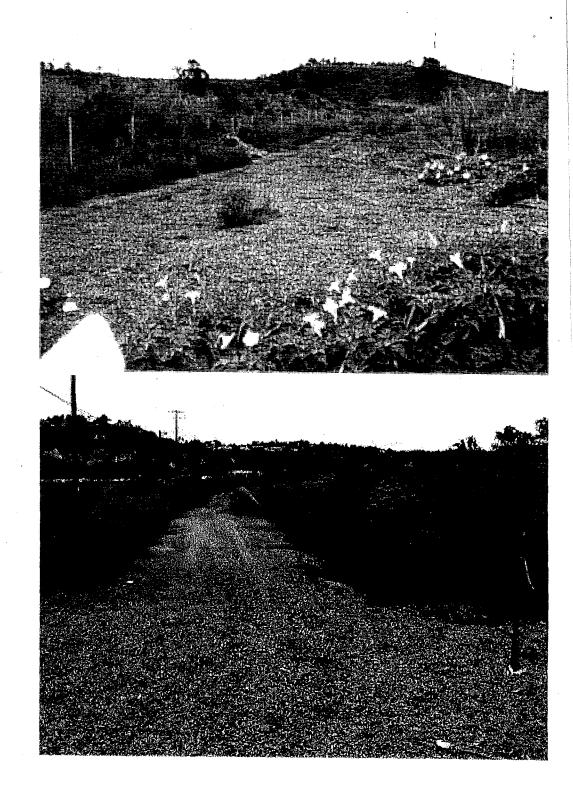


PICT0242

Looking South. View from the south bank of San Dieguito River of "ancient" El Camino Real segment.

PICT0245a

Looking North. View from San Dieguito Drive at what is probably the "ancient" or original El Camino Real.

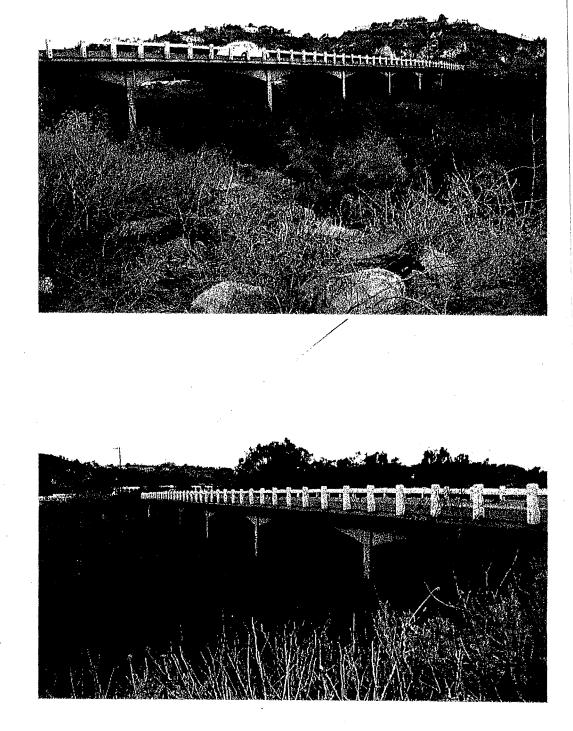


PICT0240

Looking NNW. View of El Camino Real Bridge from the southern bank of the San Dieguito River.

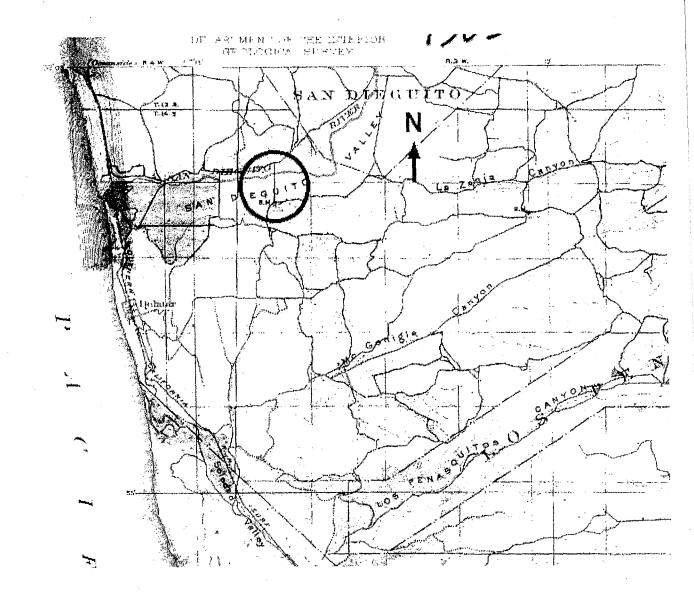
PICT0244

Looking NNE. View of El Camino Real Bridge from the southern bank of the San Dieguito River.



USGS1903

The trace of old El Camino Real across the San Dieguito River is plotted on the USGS topographic map drawn in 1903.



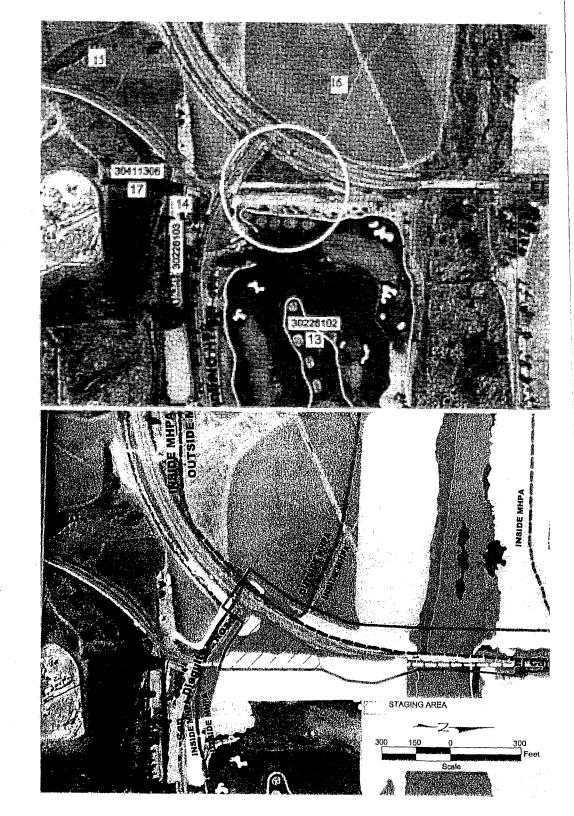
EIR 3.1-1

Tax records indicate this segment of old El Camino Real is not privately owned. The small triangle of land west of it is privately owned, but the parcel number is unknown,

EIR 3.4-1

The EIR (Fig.

3.4-1, El Camino Real Widening Project, Area of Potential Effect) indicates that the current plan is to use the short segment of old El Camino Real and the triangular area to the west as a construction staging area.



Prepared by J. Winterer, Mary Farrell,and Bill Farrell



FRIENDS of the SAN DIEGUITO RIVER VALLEY

JACQUELINE WINTERER

Research Geologist Em., Scripps Institution of Oceanography Friends of the San Dieguito River Valley President

> 289 Ocean View Ave Del Mar CA 92014 (858) 755 4460 jmwinterer@ucsd.edu



8

SUNDAY, OCTOBER 15, 2006

ocean view Trying to save a slice of history

It's not much to look at — just 800 feet of dirt road — and today it's used mostly by horseback riders fording the San Dieguito River. But this stretch of the original El Camino Real has a pedigree dating back to 1770, and that's why Friends



San Dieguito River Valley are trying to save it. It is imperative to preserve this frag-

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PETER KAYE

road critical to the history of the region," the organization argues, "Unless efforts are made, it will disappear."

Leading the charge is Friends President Jacqueline Winterer, who is challenging the city of San Diego's plan to realign the present El Camino Real and widen its bridge over the river.

With four lanes, a 14foot median and trees on either side of the road, she says, the city's project would be bigger and bulkier than necessary. What's worse, it would jeopardize its ancestor. The original El Camino Real parallels the present road a few feet to the west. The south end may be wiped out if it becomes a staging area for construction, Winterer fears, and the north portion would be buried under the city's realignment.

Newcomers to the state and longtimers who've forgotten their fourth grade lessons should be reminded that El Camino Real is a vital part of California's history. Meaning "royal road" or "king's highway," El Camino Real was established by Gaspar de Portola, a Spanish soldier and governor of California from 1768 to 1770.

Following old Indian trails, Portola's expedition of 63 left San Diego in 1770 and established a route that eventually linked missions all the way to Monterey.

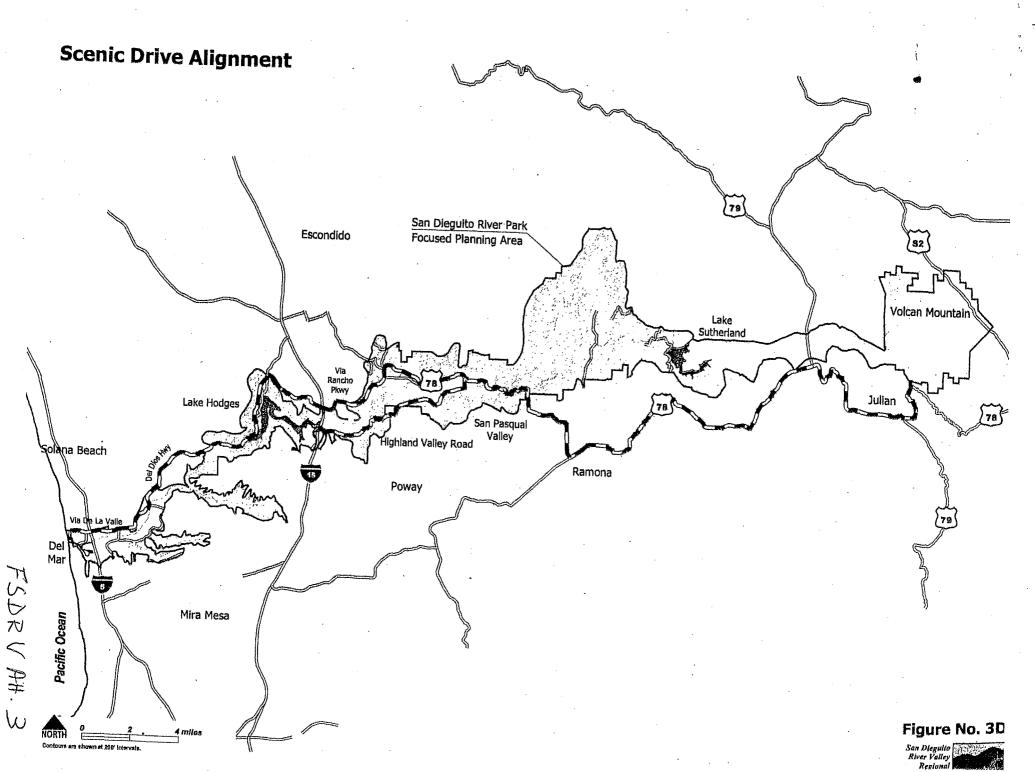
Father Juan Crespi, a Franciscan monk who accompanied the party, wrote this description of the San **Dieguito Valley: "We** pitched camp near a large pool of good, fresh water which the soldiers called Well of Ozuna and which we called the valley of San Jacome de la Marca. ... It seems this place is near the sea, judging by our view of it as we came down the valley. The hills that surround this valley are not very high, and all are of pure earth, covered with pasture, the only thing lacking to the site being trees.?

To bolster her case, Winterer asked Alan Brown, a scholar who has translated Crespi's writings, to map the path of El Camino Real across San Dieguito Valley. From San Dieguito Road northward to the river, it coincides with the dirt road under discussion.

Attachment

Contact Peter Kaye at peterfkaye@aol.com.

FSDRU



From:"Dana Johnson" <djohnson@sfidwater.org>To:<DSDEAS@sandiego.gov>-___Date:10/19/2006 7:48:16 AMSubject:Comments on EIR for City of San Diego El Camino Real Road/bridge Widening Project

Donna; Attached you will find the Santa Fe Irrigation District Comments concerning the EIR for the EI Camino Real Road/Bridge Widening Project.

If you have any questions, please call me at 858-414-9978

I will be on vacation from 11:00 am Thursday Oct 19 thru Tuesday October 24 and returning to work on Wed Oct 25. I will have my cell phone on and have access to my computer

Thanks

Dana Johnson Engineering Manager P.O. Box 409 Rancho Santa Fe, CA 92067-0409 858-756-2424 858-756-0450 fax 858-414-9978 cell djohnson@sfidwater.org

Allen Matkins

Allen Matkins Leck Gamble Mallory & Natsis LLP Attorneys at Law

501 West Broadway, 15th Floor | San Diego, CA 92101-3541 Telephone: 619.233.1155 | Facsimile: 619.233.1158 www.allenmatkins.com

Lynne L. Heidel E-mail: lheidel@allenmatkins.com Direct Dial: 619.235.1542 File Number: S7133-002/SD659700.02

October 19, 2006

Donna Clark, Environmental Planner City of San Diego Development Services Center 1222 First Avenue, MS 501 San Diego, California 92101

Re: Draft Environmental Impact Report - El Camino Real Road/Bridge Widening Project

Dear Ms. Clark:

We represent San Diego Surf Cup, Inc. ("Surf Cup"), the holder of a contract, dated January 1, 1998, with the San Diego Polo Club ("Polo Club"). According to the terms of the contract, Surf Cup is permitted to use the Polo Fields on El Camino Real for soccer tournaments through December 31, 2013. Surf Cup plays host to two annual soccer tournaments in July/August and November of each year at the Polo Fields, in an effort to promote the highest level of competition available in youth soccer. These tournaments operate pursuant to special events permits issued on a tournament by tournament basis by the City of San Diego ("City").

We thank you for this opportunity to provide comments on the Draft Environmental Impact Report ("DEIR") for the El Camino Real Road/Bridge Widening Project ("project") pursuant to the California Environmental Quality Act ("CEQA"). The project, as proposed, will have an extremely negative impact on the environment and on the future of Surf Cup, as detailed below. The impact on Surf Cup depends to a great extent on the alternative selected by the decision maker. In particular, the alternative preferred by the City of San Diego Transportation and Drainage Division, the Eastern Alternative, will have the most negative impact on Surf Cup, as it will remove seven fields from tournament play. The impact to the property is shown on Exhibit 1, which is attached to this letter for your review. After reviewing the DEIR, it is our belief that the document needs to be revised to address the inadequacies highlighted in this letter.

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Surf Cup

According to the San Diego Convention and Visitor's Bureau ("ConVis"), Surf Cup is the largest annual sporting event in San Diego County, akin to a large convention. ConVis presented its Client of the Year Award to Surf Cup in 2005. The San Diego City Council has recognized Surf Cup and its healthy and positive contribution to the community every year with resolutions declaring "Surf Cup Days in San Diego" to coincide with the three weekends of tournament play. The Mayor of San Diego, together with the City Department of Special Events and ConVis, invited Surf Cup's organizers to a press conference in July 2006, at which time Mayor Jerry Sanders publicly recognized the importance of the economic impact of Surf Cup, as well as the recognition Surf Cup brings to the City.

The two Surf Cup tournaments are held at the Polo Fields over three weekends and are among the most prominent tournaments in the United States. They bring approximately 16,000 visitors to San Diego annually and have an economic impact of over \$19.5 million on the San Diego regional economy. Participants in the annual events account for approximately 18,000 hotel roomnights each year. Excess funds generated by the tournaments are put back into the community by way of donations to the San Dieguito Surf Soccer Club ("Surf Soccer Club"), as well as other charitable and non-profit organizations.

The Surf Cup contract with the Polo Club includes providing field space to the Surf Soccer Club for general practices for eleven months of the year and games throughout the fall. This partnership utilizes the funds generated by the tournaments to provide field space for approximately 600 children to practice and play games at no cost to the City. This arrangement relieves the City of the responsibility to provide field space on the City's already overcrowded park land.

Surf Cup participants, who range in age from 9 to 18, come from all over the world. Coaches from some of the most prestigious colleges and universities attend the tournament to scout talent for scholarships. In fact, Surf Cup is considered to be the premier scouting opportunity for youth soccer players striving to continue playing soccer in college.

All Surf Cup games are played at the San Diego Polo Club on 18 full-sized fields. The ability to hold each of the two annual tournaments in a single location is one of the main reasons Surf Cup has grown to such prominence since its move to the Polo Fields in 1992. A single location provides opportunities for corporate sponsorship and college scouting that are not possible at a multi-site event. However, implementation of the project in its proposed form will remove seven fields from play, thereby eliminating the critical mass required for a single site event and bringing an end to the tournament.

Moreover, loss of the Surf Cup tournaments also will negatively impact the Surf Soccer-Club, which benefits financially from the tournaments and is provided field space as a result of this unique partnership. Without Surf Cup financial support and the use of the Polo Fields, the Surf

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Soccer Club will be without a facility on which to hold their operations. Over 600 children will lose their place to play soccer.

As a result of the project's potential negative impacts on the environment and on soccer in San Diego, we have reviewed the DEIR on behalf of Surf Cup and provide the following comments thereon.

CEQA Significance Thresholds

As a preliminary issue, the DEIR appears to rely on the City of San Diego Significance Determination Guidelines from November 2004. Such a reliance is contrary to well-settled law. Specifically, according to the Guidelines for the California Environmental Quality Act (14 Cal.Code Regs. §§ 15000, *et seq.*), "[t]hresholds of significance to be adopted for general use as part of the local agency's environmental review process must be adopted by ordinance, resolution, rule or regulation, and developed through a public review process and be supported by substantial evidence." *See*, CEQA Guidelines § 15064.7(b). It is our understanding that the City has never formally adopted the draft significance guidelines that are used in the DEIR. As a result, City staff improperly relied on unsupportable significance thresholds. Such an error leads to inaccurate analysis, which should be rejected.

Environmental Setting

The Environmental Setting discussion of the DEIR is flawed, in that it fails to adequately consider the project's impact on Surf Cup. This error stems from the fact that the document's Environmental Setting fails to identify Surf Cup as an existing land use in the project's vicinity. By not including Surf Cup within the environmental setting, the remainder of the analysis included in the DEIR is incomplete and erroneous.

Project Description

Next, the DEIR's Project Description is inaccurate. With regard to the project's location within the Coastal Zone, the DEIR's project description states that a coastal development permit ("CDP") is needed from the City, which is then appealable to the California Coastal Commission. However, a second CDP is needed for any portion of the mitigation monitoring program that falls within the jurisdiction of the California Coastal Commission. This second CDP process is not addressed in the project description. Failure to properly identify a project in the project description is a significant defect under CEQA. Because the DEIR falls victim to that error, the remainder of the document is therefore, questionable.

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Project Segmentation

The DEIR improperly piecemeals one transportation project into three separate projects. Specifically, at the same time the City is working to widen El Camino Real between San Dieguito Road north to Via de la Valle through this DEIR, the City also is working to: (1) widen El Camino Real from San Dieguito Road south to Sea Country Lane, and (2) widen Via de la Valle from San Andreas Drive east to El Camino Real. As shown on Exhibit 3.1-2, both of these proposed projects are immediately adjacent to the road widening proposed in the DEIR. In light of the related aspect of these two other projects, it is arguable that the individual projects are all part of one whole, and should be considered in one EIR. In effect, the City has chosen to segment the widening of roads in the area into multiple projects with different EIRs, in an effort to avoid full environmental analysis. Failure to adequately analyze the full extent of a project in an EIR is specifically prohibited by CEQA. Thus, the City's decision to segment these related projects into three separate environmental reviews is improper and the DEIR should be rejected.

Federal Environmental Review

Another overarching problem with the DEIR is that the document was not processed and released together with the environmental review required by the National Environmental Policy Act ("NEPA"). As noted in the DEIR, the project requires NEPA analysis because of federal funding from the Federal Highway Administration ("FHWA"). However, the environmental assessment ("EA") that allegedly is being prepared was not available for review and comment at the same time as the DEIR. Such a process is in direct conflict with CEQA Guidelines § 15222, which encourages the preparation of joint CEQA/NEPA documents. There is no discussion in the DEIR as to why a joint document was not prepared, or whether the FHWA was consulted on preparation of the DEIR. Moreover, there is no meaningful information provided as to when the EA will be published, or how it will impact the City's review and implementation of the project. Failure to include this information leads to a defective document, which cannot be the basis for ultimate review by the San Diego City Council.

Land Use Impacts

The DEIR's Land Use analysis is defective. As noted, the DEIR does not consider Surf Cup, an existing land use adjacent to the property since 1992. This failure is particularly conspicuous in the Land Use section, wherein Issue 4 addresses the Effects on Existing and Planned Recreational Facilities, and considers the Polo Club. There is no discussion in that subsection, or anywhere else in the Land Use section for that matter, of Surf Cup and/or the project's impacts on the annual soccer tournaments. Moreover, the analysis that is included regarding the Polo Club is abbreviated and does not contain any comments from the Polo Club's spokesperson, but instead relies on the Polo Club's website for information. When compared to Table 3.1-10 and the discussion of the project's impacts on the Del Mar Horsepark, which sits just across El Camino Real from the Polo

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Club, the minimal analysis of the Polo Club and the total lack of information on Surf Cup and local soccer become even more apparent and more egregious.

Another flaw apparent in our review of the Land Use section is that, although the DEIR states that the City will work with the Polo Club to reduce impacts on the property, including adjusting the play areas, there is no support for such a statement. In fact, the DEIR fails to discuss whether such adjustment would be possible under any of the alternatives, and more particularly, under the Eastern Alternative, which is estimated to impact 225 feet of Polo Club property. If such adjustment is not possible, and it may not be, then the DEIR should include a discussion of the ultimate impact the project would have on polo in San Diego, including the economic and recreation impacts caused by road widening. Similarly, the DEIR needs to include the same impact discussion relative to Surf Cup and the Surf Soccer Club, including the temporary and permanent impacts a loss of 225 feet would have on recreation and soccer in San Diego.

The DEIR's discussion of Section 4(f) of the U.S. Department of Transportation Act of 1986 also fails to consider the project's impact on Surf Cup. Soccer at the Polo Fields is open to thousands of participants and spectators during the three weekends of the two annual tournaments. Failure to discuss Surf Cup in this context is a significant error. The Surf Soccer Club's use of the Polo Fields on a regular basis is similarly ignored, which again represents a significant flaw in the DEIR.

The DEIR also is in error as it relates to the term of the City's lease with the Polo Club. It is our understanding that the lease does not expire until 2013, contrary to the DEIR's claim that the lease expires on March 31, 2012.

Traffic/Circulation

Because the description of the environmental setting is inaccurate, the DEIR fails to adequately consider the project's impact on parking at the Polo Club and on the Hu property. During polo season, participants park at the west end of the Polo Fields, which parking will be impacted by the project. Similarly, participants in the Surf Cup tournaments park on the adjacent Hu property, pursuant to an agreement with the neighboring property owner. Although the proposed project will negatively impact a substantial portion of the leased space used for parking, this issue is not addressed in the DEIR with regard to weekly polo matches, Surf Cup tournaments or Surf Soccer Club practices and games.

The DEIR identifies significant traffic impacts associated with Central Alignment, Western Alignment and Lower Elevation alternatives, but nonetheless, decides to forgo feasible mitigation measures associated with those alternatives. As explained in the DEIR, the impact on long-term level of service ("LOS") at Via de la Valle eastbound to El Camino Real southbound would be LOS E in the AM and PM peak for these alternatives, which would be a significant impact under the CEQA threshold. The impact could be mitigated by providing a dedicated right turn lane; however,

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the mitigation measure is not being selected because the configuration would cause land use impacts at Mary's Tack and Feed. Despite this broad statement, no specific land use impacts are explained or even noted in the DEIR's discussion of long-term LOS.

In fact, a review of the Land Use section, as it relates to Mary's Tack and Feed, indicates that the project's impact on that existing use would be limited to the store's driveway, and would not impact the store. There is no information included in the DEIR to justify the statement that a land use impact on Mary's Tack and Feed prevents the implementation of an otherwise feasible mitigation measure needed to mitigate traffic impacts caused by the Central Alignment, Western Alignment and Lower Elevation alternatives. As a result, the decision not to recommend feasible mitigation measures is inappropriate.

Preferred Alternative

For the same reason identified in the Traffic/Circulation discussion, Surf Cup objects to the City's preferred alternative decision. In contrast to the limited impact the Western Alternative would have on Mary's Tack and Feed, the Eastern Alternative, selected by the City as the preferred project, will severely limit the ability of the Polo Club and Surf Cup to continue using the Polo Fields, and will most likely result in the demise of Surf Cup soccer in San Diego.

Additionally, the benefits associated with the Eastern Alternative's plan to retain the current bridge for non-vehicular use are not as clear cut as indicated throughout the DEIR. Buried within the Biological Resources section is a brief mention that the board of the Joint Powers Authority ("JPA") that manages the adjacent property must act to accept the bridge. If the JPA does not act, then the Visual/Aesthetic mitigation measure relative to bridge fencing would presumably apply to the Eastern Alternative. In particular, the significant impact associated with the fencing will be applicable to the Eastern Alternative since the new bridge would have to accommodate nonvehicular traffic in the same manner as the other alternatives. Such information should be included within the discussion of the preferred alternative, to allow the City Council to consider the full impacts of the project and its alternatives.

In addition, the plans to retain the existing bridge under the Eastern Alternative appear to be either unsafe, illegal or both. The DEIR states that the current bridge must be removed because, in its current position, the 100-year floor level would rise to the bottom of the bridge deck, thereby preventing debris from passing underneath. Significantly, the DEIR notes that the existing bridge is not structurally adequate for the local seismic conditions, because the piles are relatively shallow and buried in sediments that could fail in an earthquake due to liquefaction. Despite these very serious concerns, which are not adequately considered in the text of the DEIR, the City has identified the Eastern Alternative as the preferred alternative. Such a decision seems ill-advised in light of the unanalyzed impacts.

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To compound this error, the DEIR does not provide a full description of the preferred alternative, which cuts the project's estimated completion time by only 85 days, or approximately 3 months (705 days for the Western or Central Alternative versus 620 days for the Eastern Alternative). Such a delay is inconsequential when compared to the project's entire timeframe. The difference should be pointed out clearly in the discussion of the preferred alternative, as the benefits of the preferred alternative are not as clear cut as indicated in the DEIR.

Therefore, in light of the DEIR's failure to adequately disclose the project's impacts as they relate to each alternative, Surf Cup does not believe the document can support approval by the City Council of the Eastern Alternative.

Hydrology/Water Quality

The DEIR fails to include adequate mitigation for the project's Hydrology/Water Quality impacts. First, the document improperly delays identification of mitigation measures to a future date. The DEIR states that mitigation measures will be developed during negotiations with the permitting agencies, which agencies are not defined in the mitigation measures, after completion of the DEIR. Such a postponement is contrary to well-settled law and violates CEQA. Second, the mitigation measures that are included are not supported by the DEIR. Specifically, Mitigation Measure 7-1 states that buried bank stabilization would mitigate for increased 100-year velocities. However, this conclusion is not adequately considered or analyzed in the document, and therefore, should not be considered therein.

Geology/Seismicity/Soils

The DEIR identifies significant geologic impacts caused by the project, but states that "typically, standard construction practices recommended in a geologic report would not be mitigation." Toward that end, none of the recommended construction practices are included within the text of the DEIR or identified as specific mitigation measures. Failure to include the recommended procedures as mitigation measures leaves project implementation susceptible to attack, in that none of the measures are included within the enforceable Mitigation Monitoring and Reporting Program ("MMRP") pursuant to CEQA. Such an oversight is in error.

Air Quality

The DEIR fails to include any discussion of the project's air quality health effects, as required by law. Moreover, the air quality section of the EIR identifies a number of fugitive dust emission standards that would be incorporated into project plans. However, as with the geology section discussed above, failure to include these standards as mitigation measures leaves the project vulnerable. The DEIR's consistent disregard for the MMRP leads to the inevitable conclusion that the document is flawed and subsequent efforts to implement the project will significantly impact the environment, without proper recourse to the enforceable MMRP.

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Noise

Similar to the issues raised with regard to geology and air quality, the DEIR identifies noise impacts that would result from construction of the project, pursuant to the "Consistency with the Environmental Assessment" discussion. Although identified as a potential necessity, there is no mitigation measure that controls the construction of a wall on the Prime 10 Steak House. In fact, the document fails to make permit conditions that would be required for wall construction into mitigation measures. This lack of enforceability at the time of project implementation subjects the EIR to challenge.

Biological Resources

The final impact area discussed in the DEIR is Biological Resources, which also happens to be the most extensive discussion therein. However, the document fails to adequately consider the project's impacts, and as a result, should not be relied upon by the decisionmakers. The primary Biological Resources defect lies with its mitigation measures.

Specifically, the DEIR does not identify the possibility that the project could result in a take of an endangered species. Although the document states that between 31 and 36 pairs of Light-Footed Clapper Rail and two Least-Bell's Vireo territories were detected in the project vicinity, the DEIR states that direct impacts to wildlife species are *not* anticipated. Such a conclusory statement is not supported by the document. Similarly, the DEIR indicates that the Coastal California Gnatcatcher is not expected to occur onsite, despite the fact that no gnatcatcher specific surveys were conducted for the project. These inconsistencies with regard to listed endangered species cannot support project approval.

In addition, the failure to specify impacts to identified species is compounded by the DEIR's mitigation measures, which seek to mitigate project impacts by creation or restoration of habitat. Such efforts cannot mitigate for the potential loss of endangered species, resulting in significant and unmitigatable biological impacts.

Furthermore, other mitigation measures recommended by the DEIR are flawed. In particular, Mitigation Measure 12-6 fails to identify what agency permits must be obtained prior to the bid opening / bid award; and Mitigation Measure 12-7 states that construction noise would be limited to 60 decibels during clapper rail and least Bell's vireo breeding season, but fails to clarify how such a measure will be implemented, *i.e.*, who will conduct the necessary noise monitoring.

Notice and Consultation

Lastly, copies of the DEIR were not distributed to Surf Cup for its review, despite the City's awareness of the tournament and its importance to the City. As explained above, the San Diego. City Council passes resolutions celebrating the tournaments each year, and in July 2006, Mayor Sanders invited the Surf Cup organizers to participate in a news conference before the start of the

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tournament. Nevertheless, Surf Cup was left off the distribution list and was not consulted by the preparers of the DEIR. Such an oversight is just one of many errors noted in the DEIR with regard to Surf Cup. Therefore, we request that the Surf Cup be added to any distribution and notice lists for the project and be consulted on any revisions to the DEIR.

Conclusion

In sum, we believe that the DEIR is fatally flawed in its current form. The proposed project will result in significant and unmitigatable impacts on the environment, some of which were not addressed in the document. Moreover, the preferred alternative was selected by the City in an improper fashion. The EIR weighs too heavily in favor of the existing uses to the west of El Camino Real, to the substantial detriment of the Polo Club and Surf Cup, such that the ultimate analysis is flawed. Because the DEIR is defective, we do not believe this document can constitute substantial evidence to support City Council approval of the project.

If you have any questions or if we can be of service during the continuing project review process, please do not hesitate to contact us.

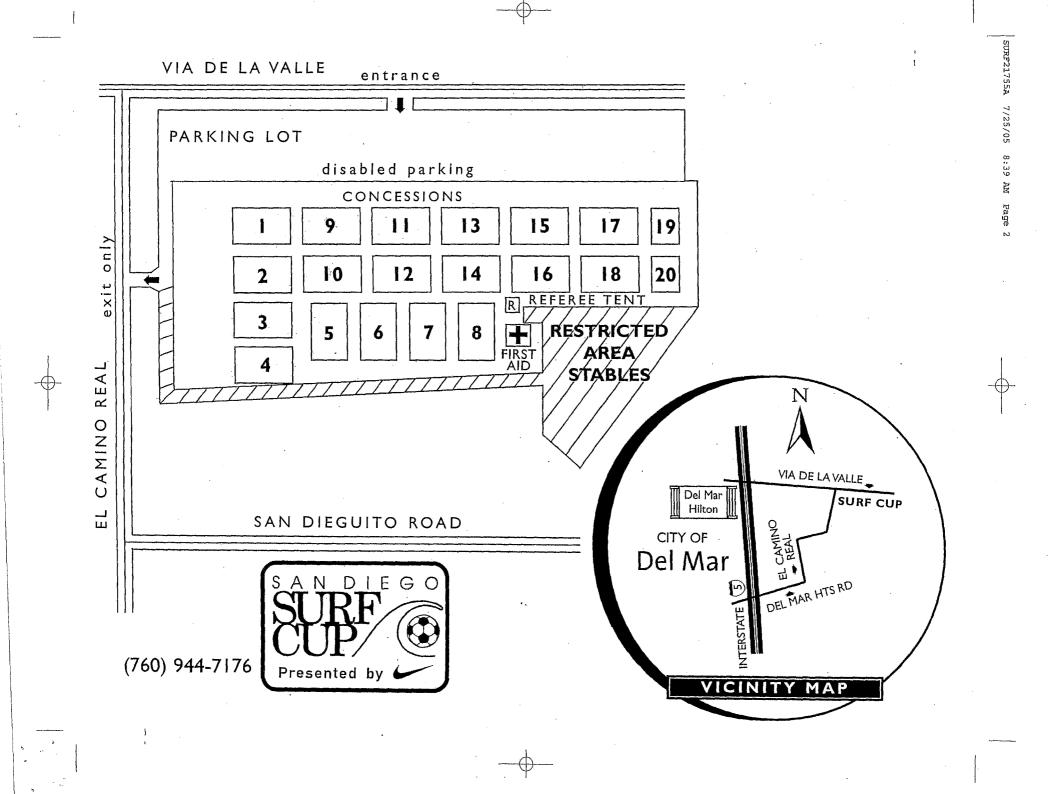
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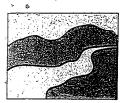
Lynne L. Heidel

Heather S. Riley

LLH:hsr

Council President Scott Peters cc: Mr. R. Michael Connerley Mr. Michael Dawson Mr. Paul E. Robinson, Esq.





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October 20, 2006

Donna Clark City of San Diego Development Services Center 1222 First Avenue, MS 501 San Diego, CA 92101

Subject: El Camino Real Road/Bridge Widening Project #2982 Comments on Draft EIR

Dear Ms. Clark:

We appreciate the opportunity to comment on the El Camino Real Road/Bridge Draft EIR. The JPA Board of Directors considered the DEIR at our October 20, 2006 meeting and while we recognize the need to improve the El Camino Real Bridge for seismic and flood protection, proposed changes to the semi-rural and open vista character of the San Dieguito river valley are a major concern. We feel that the DEIR is inadequate and request that a revised DEIR be circulated for public review reconsidering all the project alternatives per our comments listed below and including new alternatives as described in comment #3. The San Dieguito western river valley is a public treasure that forms the gateway to the 55-mile long regional open space park. We believe that the City's focus on a road and bridge widening project that would only marginally improve traffic flow largely ignores the broader goals of preserving the San Dieguito River Valley.

In addition, widening El Camino Real from Via de la Valle to San Dieguito Road (along with widening a section of Via de la Valle) is not justified at this time. Council President and District 1 Councilman Scott Peters initiated an ad hoc western river valley task force in September 2006 that has already held several meetings to evaluate the land use issues in this area, prompted by the recent proposals to widen El Camino Real and Via de la Valle. The task force should be allowed to complete its work prior to any decisions made on this project. Task force recommendations are expected by January 2007.

Specifically, we have the following comments on the DEIR:

1. As justification for the project, the Draft EIR compares "existing condition" traffic counts taken in July 2003 to the 2030 levels. The EIR should clarify the land use assumptions used in 2003. Since July

> 2003 much new development has occurred both in the immediate Carmel Valley and Pacific Highlands Ranch vicinity as well as in the large developments to the east and south---Torrey Highlands; Del Mar Mesa; Camino Del Sur, etc. All of these developments would feed traffic into the project area, so, presumably, the traffic counts would be much higher today than in 2003. The proposed increase over today's traffic may be significantly less than the 2500-ADT increase depicted. The Final EIR should thoroughly analyze the difference between traffic volumes counted in 2003 and 2006.

2. LOS definitions include speed limits as shown in Table 3.2-1. Justification for widening the roadway to four lanes should not include LOS levels that assume achievement of high speed limits along this stretch of scenic roadway. LOS levels may not approach E or F if it is determined that a speed limit of 35 MPH along the roadway is reasonable.

3. <u>Visual impacts in the river valley from wider (122 feet vs. 23 feet)</u>, longer (354 feet vs. 340 feet), and higher (5-10-ft. higher than current bridge) bridge and roadway should be reduced by reducing the bridge width to the maximum extent possible. The entire project width and scope is excessive. The EIR does not examine other alternatives that would improve circulation but would also be less impactive to visual quality, community character, and endangered species habitat. Recommend adding at least two new alternatives to the Draft EIR analysis, both of which would include an undercrossing for the Coast to Crest Trail and connections from the south for pedestrians, bikes, and equestrians:

a. <u>Modified Current Road/Bridge</u>: Modify the existing bridge to meet seismic and 100-year flood standards. This can be done by seismic retrofit as has been done for other bridges throughout the county (increasing the depth of the existing piers) and by increasing the abutment slopes from 2:1 to 1.5:1 to provide additional flow capacity. This alternative would also include cantilevers on both sides of the existing bridge to accommodate bikes and pedestrians (east side) and pedestrian/equestrians (west side). We believe there is sufficient room under the existing bridge to accommodate a raised platform trail for the Coast to Crest Trail. Also included would be improvements at each intersection, such as

> roundabouts and extending the right-turn only lane on northbound El Camino Real to eastbound Via de la Valle, to improved flow.

- b. Modified Central Alignment: Replace the old bridge and roadway with new as proposed for the Central Alignment (i.e., project would be above the 100-year flood as proposed) with the following modifications: road and bridge would consist of 2 12-foot wide traffic lanes instead of 4, with 8-foot bike lanes on both sides, and a 6- to 10-foot wide landscaped median, a 13-foot wide pedestrian/equestrian lane on the west side (equestrian portion would only exist on bridge itself and would end at connection to Coast to Crest Trail, with pedestrian walkway continuing on the road), and a 5-foot wide pedestrian walkway on the east side. This alternative would also include modifications at the intersections (such as roundabouts) to improve flow. A ramp would also be provided on the west side/north end of the bridge to access the Coast to Crest Trail undercrossing. With this configuration, the total width of the bridge would be 64 to 68 feet wide (depending on the width of the median).
- 4. A traditional box girder design does not meet the objectives to minimize the visual impacts. The box girder is too straight with no visual relief. The design should replicate the existing bridge in style with arched columns to provide visual interest.
- 5. The EIR should include a cross section of the bridge similar to Figure 2-1 for the expanded roadway to clearly depict and label the proposed features.
- 6. View blockage is significant and is not fully mitigated just by changing the railing type on the new bridge (page S-5). View blockage to the west and east from the trail and public property (Polo Club site) would not be mitigable. The EIR does not make it clear that the new road/bridge would be 5 to 10 feet higher than the existing condition it is only stated once on page 2-7 and is not stated at all in the visual impact analysis. In addition, public presentations from City Engineering staff stated that the new bridge would be 12 feet higher than the existing bridge. The DEIR bases conclusions on inaccurate and vague information.

> 7. Fencing for a cantilever can be designed using vertical pickets rather than chain link so as not to further block views to the west. Visual impacts should be the same for all alternatives including the preferred, and significance should not be based on a chain link cautilever railing. The JPA's recommendation for the cantilever railing is a 2-foot high solid toe plate with 6 foot high railing on top for a total height of 8 feet to provide safe use for horses. The fence can be made of vertical metal pickets spaced at 4 inches apart up to 42 inches high (required by building code), but increased spacing above 42 inches to increase views through the fence. This design has been used successfully at the JPA-designed cantilever along Bandy Canyon Road in the San Pasqual Valley.

> 8. The railing proposed for the Eastern Alignment Alternative along the old bridge/new trail (chain link over the existing wood fence) would block views of the river valley and would be a maintenance burden for the JPA. Instead the existing wood railing should be removed and replaced with simple metal posts/pickets spaced no less than 4 inches apart, and 5 to 6 feet high. In addition, the concrete surface of the existing bridge should be scored to provide for a non-slip surface to safely accommodate horses. Also recommend modify striping shown in the DEIR, to specify bikes on outside lanes (closest to edge) and horses and hikers sharing the inside lanes.

9. The Draft EIR does not address the issue of debris potentially becoming trapped by floodwater against the old bridge if retained. Page 1 of the Draft EIR cites insufficient room to pass debris under the existing bridge during flooding conditions; but the Draft EIR fails to address this issue for the preferred alternative, which retains the old bridge.

10. The Draft EIR states that the project would increase flow velocities in the river (page 3.7-19). This change would occur from essentially creating a dam along El Camino Real north of the river forcing floodwaters into the wider channel instead of a more natural sheet flow across the floodplain. Increased flow velocity could also damage the existing bridge, which is not clearly addressed in Section 3.7. The JPA is concerned that we would be vulnerable to lawsuits regarding flood or seismic damage to the old bridge from a change in hydrologic conditions from the project.

11. Section 3.7 of the Draft EIR does not make clear what is proposed to improve flow under the existing bridge if it was retained. Page 3.7-12 states that for all alternatives the abutment slopes would be steepened to 1.5:1 to allow the new bridge to convey a 100-year storm; but page 2-13 states that for the preferred Eastern Alignment Alternative the "river banks under the existing bridge would not be steepened, only the banks under the proposed bridge". The DEIR does not demonstrate how the 100-year storm situation would be improved for the preferred alternative if the existing bridge is retained without improvements to convey the stormwater. The JPA cannot retain responsibility for a bridge structure that remains vulnerable to flood damage, or that could cause damage to other properties or structures.

- 12. The Draft EIR does not address potential impacts on marsh habitat as a result of increased flow velocity in the river. Page 45 of the Natural Environment Study Report states that "100-year flood velocities with the proposed project would be the same as predicted for existing conditions". This is incorrect, and in fact, the Draft EIR and hydrology study state that 100-year velocities would <u>increase</u> in the river corridor from downstream of the existing bridge to upstream of the new bridge. Please also see comment #13.
- 13. The hydrologic conditions that exist in the project area are critical to the survival of the significant clapper rail population. A detailed study of the hydrologic conditions along this segment of river should be conducted to understand the conditions that allow this endangered species to thrive in this location, and to accurately evaluate impacts to the population from this project. The clapper rails prefer slow-moving and ponding water with stands of emergent marsh vegetation to hide, feed and nest. The Draft EIR must evaluate whether the project would change these conditions. Increasing the cfs or other hydrologic changes could change conditions enough to impact the population. The hydrology should be maintained and also duplicated on the mitigation site to provide conditions favorable to the species. This entire issue is completely missing from the Draft EIR, and is the key to determining the significance of the project's impact on the survival of the clapper rail population.
- 14. All of the proposed alternatives would significantly impact habitat for the clapper rail. The mitigation project should be implemented prior to

> the impacts occurring for the project to provide substitute habitat opportunities for the rails during the construction disturbance of the river corridor.

- 15. The Clapper Rail population was found primarily under and to the east of the existing bridge. Therefore, the alignment of the preferred alternative to the east would impact more rail pairs than any of the other alternatives and would potential fragment the habitat by cutting off the area west of the new bridge from the habitat to the east. The habitat between the existing and new bridge should also be counted as impacted. The Eastern Alignment appears to have greater permanent impacts to the endangered species than the other alternatives – despite the shorter construction schedule.
- 16. The DEIR partially justifies the preference of the Eastern Alignment based on the fact that it would result in fewer impacts to the clapper rails during construction because it reduces the construction period to two seasons instead of three. However, the DEIR does not discuss whether retaining the old bridge would benefit the species at all. Are there any benefits to the species from removing the bridge? The Eastern Alignment would cause more permanent impacts to the habitat because two bridges would result in less overall habitat and potentially affect the hydrologic conditions favorable to the species (see comments above). Therefore, it doesn't seem that the reduced number of construction seasons outweighs the greater permanent impacts.
- 17. Considering the significance of this population of clapper rails, the project site and mitigation site should both be incorporated into a long-term ongoing monitoring effort. The proposed 5-year monitoring and maintenance period at the mitigation site is inadequate and does not guarantee its success, which should be a long-term preserve to replace lost habitat from the project. The project should implement or at least contribute a fair share contribution to add both areas to long-term monitoring sites. Long-term management should also be required to maintain the existing population (and hopefully a future population at the mitigation site) as is done for other large populations in the state. The need for long-term management to maintain and hopefully recover this species is well documented in the Management and Population Assessment (Zembal et al, 1997) and annual status and distribution reports (Zembal et al).

- 18. The Draft EIR does not evaluate whether adding a new bridge while retaining the old bridge would impact the wildlife corridor by adding further obstructions to wildlife movement (compared to replacing old bridge with new bridge). The Draft EIR (pages 3.12-47 and 3.12-49, #4) states that the new bridge would "improve" the function of the wildlife corridor because it would be higher and consist of fewer piles. However, it does not explain how the preferred alternative would "improve" the function since the existing bridge would remain. Would adding new piers while leaving the old piers in place create a cumulative impact to wildlife movement?
- 19. The Natural Environment Study Report, page 41, mentions the wildlife corridor culvert required by the MHPA guideline and states that because the project is north of the existing culvert at Gonzales Canyon, the project will not include such a culvert. While it is true that the proposed project is north of the existing culvert, the MHPA guideline does not state how such a culvert would be built. Since the proposed project is within the MHPA and would significantly impact wildlife and habitat within the wildlife corridor, appropriate mitigation should include a fair share contribution to implementing the MHPA guideline for constructing a wildlife corridor culvert.
- 20. Views of the river valley to the west from the City-owned Polo Club property would be blocked by the new bridge. The property is part of the Fairbanks Ranch Country Club Specific Plan and was deed restricted as open space in 1983 as part of the mitigation for development of Fairbanks Ranch, and was dedicated as open space to the City - views are public. The statement on page 3.1-16 that views to the west are "not public views" is incorrect and should be reevaluated. The impact from raising the bridge and road by 5 to 10 feet within a sensitive river valley, most of which is a public open space preserve, is significant and mitigation must be provided or the project redesigned to reduce impacts to less than significant.
- 21. The Draft EIR should address the issue of potentially removing Cityowned open space land for new right-of-way needed for the Eastern Alignment. Would there be a net loss of open space? This is not evaluated in the EIR. Any loss of open space should be mitigated, possibly by transferring unused road right-of-way to public open space.

- 22. The paragraph on page 3.1-57 regarding Polo Club lease area should also state that the Coast to Crest Trail (public trail) alignment must also be retained or replaced if impacted.
- 23. Cumulative Effects Section 4.3 mis-characterizes the project area by stating that the projects list (Table 4-1) reflects a "trend toward creating views of urban development" (Section 4.3.2.2). In fact, over 600 acres of previously development-zoned land within the City of San Diego (from I-5 to El Camino Real) has been converted to open space through public acquisition over the last ten years to preserve the western river valley, reflecting the trend to actively preserve the wetlands and river corridor. Even in 1983 with the approval of the Fairbanks Ranch Specific Plan, the City acknowledged the "unique opportunity" to preserve several hundred acres of land as open space (this land was subsequently leased to the Fairbanks Ranch golf course and polo fields). The San Dieguito River Park Concept Plan and JPA's Park Master Plan for this area documents this trend. The "urban" projects listed in Table 4-1 only represent smaller projects proposed or approved most recently (most outside of the valley itself) and does not accurately represent the trend of preserving the river valley. Land use and visual impacts to the preserve from widening and raising El Camino Real would be significant
- 24. The Draft EIR should include a visual simulation of JPA mitigation site with clearer view of the proposed berms.
- 25. Section 3.4.3.2 (page 3.4-4) does not address the significance of the dirt road along the edge of the proposed triangular staging area (according to Figure 3.1-1 the dirt road appears to be within the right-of-way for El Camino Real and connects to Old El Camino Real). This road may be a remnant of Portola's 1769 expedition but the Draft EIR does not address this particular segment. The concern is that this section may be the only remaining piece of this historic event that still retains some integrity.
- 26. The EIR states that for all but the Eastern Alignment Alternative, currently buried utilities would have to "be relocated vertically because the proposed road elevation would change." [2-26-17]. Not only should all buried lines remain buried; all utilities in this corridor should be placed on the City's priority list to bury utilities.

We hope that these comments will be fully discussed and analyzed in a revised Draft EIR for public consideration before any actions are taken on a Final EIR. Please feel free to call Shawna Anderson of our staff should you wish to discuss our comments further. We look forward to continued dialogue with the City on this important project.

Sincerely,

for Ed Gallo

JPA Board Vice Chair

Cc: Jim Waring

From:"Shawna Anderson" <shawna@sdrp.org>To:"Donna Clark" <DEClark@sandiego.gov>Date:10/23/2006 12:35:11 PMSubject:Follow up on El Camino Real EIR letter

Hi Donna,

I wanted to confirm that you received our JPA comment letter on the ECR Draft EIR. We faxed it on Friday, and the original is in the mail to you.

I also wanted to add a comment that was not made clear in our letter: The JPA would be opposed to any new bridge design that does not accommodate a Coast to Crest Trail undercrossing along the north side of the river.

Thank you!

Shawna

Shawna C. Anderson, AICP Environmental Planner San Dieguito River Park JPA 18372 Sycamore Creek Road Escondido, CA 92025 (858)674-2275, ext. 13 (858)674-2280 FAX www.sdrp.org

CC:

<susan@sdrp.org>, <dbobertz@sdrp.org>, "Richard Leja" <rleja@sandiego.gov>

TO: JPA Board

FROM: Staff

SUBJECT: El Camino Real Bridge/Road Widening Project Draft EIR

RECOMMENDATION:

Direct staff to send attached comment letter in response to the El Camino Real Bridge/Road Widening Project Draft EIR.

SITUATION:

The City of San Diego is proposing to replace the existing El Camino Real Bridge with a new bridge (Attachments 1 and 2) and widen El Camino Real from Via de la Valle to San Dieguito Road. A Draft Environmental Impact Report (EIR) is now available for public review with comments due to the City by October 21, 2006. A draft comment letter is attached for your Board's consideration (Attachment 3).

ISSUES:

The proposed project is within the San Dieguito River Park's Focused Planning Area and represents a substantive change to the existing environment within an important open space viewshed at the eastern end of the lagoon system. The project is adjacent to the Southern California Edison wetland restoration project, crosses the San Dieguito River, and within the path of the future Coast to Crest Trail. In addition, this segment of river provides habitat for a significant population of the federally endangered light-footed clapper rail (over 35 pairs detected in 2006).

The project EIR evaluates six alternatives, but identifies one, the Eastern Alignment Alternative as the preferred project. The project entails widening the segment of El Camino Real between Via de la Valle and San Dieguito Road including replacing the existing bridge over the San Dieguito River in order to improve the structural integrity of the bridge, to raise the bridge above the 100-year flood level, to improve traffic capacity and flow, and to improve pedestrian and vehicular access. The existing segment of El Camino Real is 2 lanes, 2,400 feet long, 23 feet wide, with no shoulders, bike lanes, or pedestrian walkways. The project would widen the roadway between San Dieguito Road and Via de la Valle to four lanes and add bike lanes, a 22-foot wide landscaped parkway/pedestrian walkway, and a 14-foot wide raised concrete median for a total width of 122 feet. A section of Via de la Valle east of El Camino Real would also be widened to four lanes. The bridge itself would be 94 feet wide with 2 sets of triple piers in the river (6 piers total) (Attachment 4, specifically pages 2-1 through 2-7, 2-12 through 2-16, and Figures 2-1, 2-9, and 2-19).

All the alternatives evaluated in the EIR, with the exception of the Eastern Alignment Alternative, would include removing the old bridge and adding an 8-foot wide cantilever trail along the west side of the new bridge to accommodate a connection to the future Coast to Crest Trail from the south.

The Eastern Alignment Alternative would not have a cantilever, but instead the existing bridge would be retained and the City would vacate it to the JPA for non-vehicular trail use (Attachment 5). The existing bridge would be restriped for pedestrian, bicyclist, and equestrian use. All of the new bridge alternatives, with the exception of the Lower Elevation Alternative, would include a 12-foot wide trail undercrossing under the north end to accommodate the Coast to Crest Trail. The trail undercrossing would connect to the existing trail on the City-owned Polo Club lease property east of the new bridge and to the planned trail along the north side of the river west of the bridge. The new bridge design would be 5 to 12 feet higher than the original bridge to accommodate flood flows and the trail undercrossing.

The comprehensive Draft EIR cites several significant impacts associated with the project, and includes mitigation for those impacts. A key mitigation is the creation and restoration of wetlands associated with impacts from the bridge crossing. The proposed mitigation consists of creating and restoring 15 acres of wetlands (primarily salt and brackish marsh and riparian) on the JPA-owned property (former Boudreau property) just west of El Camino Real. JPA staff have been working with City staff on terms for this mitigation proposal, which meets the JPA's objectives of the original Boudreau property purchase to eventually restore the land to natural habitat (with a direct connection to the SCE restoration project). Other mitigation consists of incorporating landscaping and wood-appearing railing on the new bridge to reduce visual impacts.

Because of the community concern over several recent road widening projects in the western river valley including the widening of El Camino Real and Via de la Valle, Councilman Scott Peters initiated an ad hoc task force in September 2006 to evaluate the land use issues in this area. Your Board as well as the Carmel Valley Planning Board has expressed concerns over the lack of coordinated planning in the western river valley and the threat of several proposed projects to the visual quality and rural character of the open space preserve. The task force includes several members of the CAC, JPA staff, and members of the community. Task force recommendations are expected by January 2007.

CAC RECOMMENDATION:

The CAC considered the Draft EIR at their September 8th and October 6th, 2006 meetings and voted in favor of recommending the Board send a comment letter asking the City to recirculate a new Draft EIR addressing the issues reflected in Attachment 3 (y-19, n-3).

RECOMMENDATION:

Direct staff to send attached comment letter in response to the El Camino Real Bridge/Road Widening Project Draft EIR.

ALTERNATIVES

- 1. Direct staff to send attached DEIR comment letter.
- 2. Provide direction on additional issues/items to include in a letter.

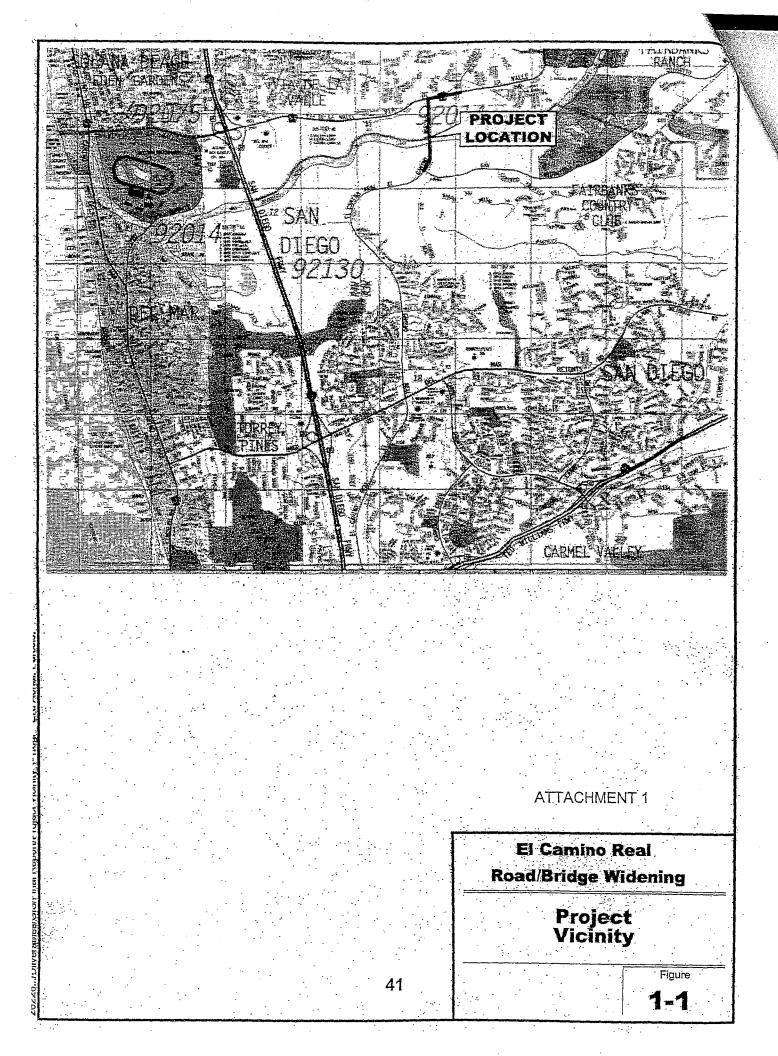
3. Give staff other direction.

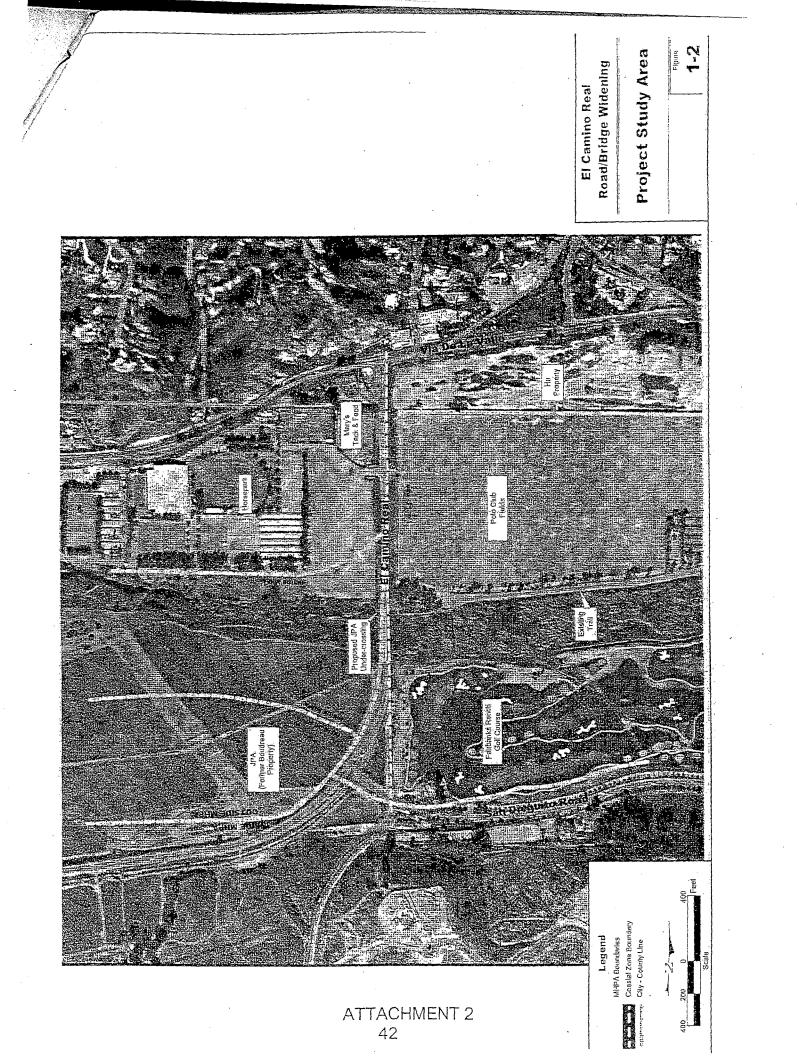
Respectfully submitted,

Shawna Anderson Principal Environmental Planner

Attachments:

- 1. Project Vicinity
- 2. Project Study Area
- 3. Draft DEIR comment letter
- 4. EIR Project Description (in September 15, 2006 agenda)
- 5. Visual Simulation





October 20, 2006

Donna Clark City of San Diego Development Services Center 1222 First Avenue, MS 501 San Diego, CA 92101

Subject: El Camino Real Road/Bridge Widening Project #2982 Comments on Draft EIR

Dear Ms. Clark:

We appreciate the opportunity to comment on the El Camino Real Road/Bridge Draft EIR. The JPA Board of Directors considered the DEIR at our October 20, 2006 meeting and while we recognize the need to improve the El Camino Real Bridge for seismic and flood protection, proposed changes to the semi-rural and open vista character of the San Dieguito river valley are a major concern. We feel that the DEIR is inadequate and request that a revised DEIR be circulated for public review reconsidering all the project alternatives per our comments listed below and including new alternatives as described in comment #3. The San Dieguito western river valley is a public treasure that forms the gateway to the 55-mile long regional open space park. We believe that the City's focus on a road and bridge widening project that would only marginally improve traffic flow largely ignores the broader goals of preserving the San Dieguito River Valley.

In addition, widening El Camino Real from Via de la Valle to San Dieguito Road (along with widening a section of Via de la Valle) is not justified at this time. Council President and District 1 Councilman Scott Peters initiated an ad hoc western river valley task force in September 2006 that has already held several meetings to evaluate the land use issues in this area, prompted by the recent proposals to widen El Camino Real and Via de la Valle. The task force should be allowed to complete its work prior to any decisions made on this project. Task force recommendations are expected by January 2007.

Specifically, we have the following comments on the DEIR:

As justification for the project, the Draft EIR compares "existing condition" traffic counts taken in July 2003 to the 2030 levels. The EIR should clarify the land use assumptions used in 2003. Since July 2003 much new development has occurred both in the immediate Carmel Valley and Pacific Highlands Ranch vicinity as well as in the large developments to the east and south---Torrey Highlands; Del Mar Mesa; Camino Del Sur, etc. All of these developments would feed traffic into the project area, so, presumably, the traffic counts would be much higher today than in 2003. The proposed increase over today's traffic may be significantly less than the 2,500 ADT increase depicted. The Final EIR should thoroughly analyze the difference between traffic volumes counted in 2003 and 2006.

WHAT IS

- 2. LOS definitions include speed limits as shown in Table 3.2-1. Justification for widening the roadway to four lanes should not include LOS levels that assume achievement of high speed limits along this stretch of scenic roadway. LOS levels may not approach E or F if it is determined that a speed limit of 35 MPH along the roadway is reasonable.
- 3. <u>Visual impacts in the river valley from wider (122 feet vs. 23 feet), longer (354 feet vs. 340 feet), and higher (5-10-ft. higher than current bridge) bridge and roadway should be reduced by reducing the bridge width to the maximum extent possible. The entire project width and scope is excessive. The EIR does not examine other alternatives that would improve circulation but would also be less impactive to visual quality, community character, and endangered species habitat. Recommend adding at least two new alternatives to the Draft EIR analysis, both of which would include an undercrossing for the Coast to Crest Trail and connections from the south for pedestrians, bikes, and equestrians:</u>
 - a. <u>Modified Current Road/Bridge</u>: Modify the existing bridge to meet seismic and 100-year flood standards. This can be done by seismic retrofit as has been done for other bridges throughout the county (increasing the depth of the existing piers) and by increasing the abutment slopes from 2:1 to 1.5:1 to provide <u>additional flow</u>, capacity. This alternative would also include cantilevers on both sides of the existing bridge to accommodate bikes and pedestrians (east side) and pedestrian/equestrians (west side). We believe there is sufficient room under the existing bridge to accommodate a raised platform trail for the Coast to Crest Trail. Also included would be improvements at each intersection, such as roundabouts and extending the right-turn only lane on northbound El Camino Real to eastbound Via de la Valle, to improved flow.
 - b. <u>Modified Central Alignment</u>: Replace the old bridge and roadway with new as proposed for the Central Alignment (i.e., project would be above the 100-year flood as proposed) with the following modifications: road and bridge would consist of 2 12-foot wide traffic lanes instead of 4, with 8-foot bike lanes on both sides, and a 6- to 10-foot wide landscaped median, a 13-foot wide pedestrian/equestrian lane on the west side (equestrian portion would only exist on bridge itself and would end at connection to Coast to Crest Trail, with pedestrian walkway continuing on the road), and a 5-foot wide pedestrian walkway on the east side. This alternative would also include modifications at the intersections (such as roundabouts) to improve flow. A ramp would also be provided on the west side/north end of the bridge to access the Coast to Crest Trail undercrossing. With this configuration, the total width of the bridge would be 64 to 68 feet wide (depending on the width of the median).
- 4. A traditional box girder design does not meet the objectives to minimize the visual impacts. The box girder is too straight with no visual relief. The design should replicate the existing bridge in style with arched columns to provide visual interest.

5. The EIR should include a cross section of the bridge similar to Figure 2-1 for the expanded roadway to clearly depict and label the proposed features.

View blockage is significant and is not fully mitigated just by changing the railing type on the new bridge (page S-5). View blockage to the west and east from the trail and public property (Polo Club site) would not be mitigable. The EIR does not make it clear that the new road/bridge would be 5 to 10 feet higher than the existing condition – it is only stated once on page 2-7 and is not stated at all in the visual impact analysis. In addition, public presentations from City Engineering staff stated that the new bridge would be 12 feet higher than the existing bridge. The DEIR bases conclusions on inaccurate and vague information.

7. Fencing for a cantilever can be designed using vertical pickets rather than chain link so as not to further block views to the west. Visual impacts should be the same for all alternatives including the preferred, and significance should not be based on a chain link cantilever railing. The JPA's recommendation for the cantilever railing is a 2-foot high solid toe plate with 6 foot high railing on top for a total height of 8 feet to provide safe use for horses. The fence can be made of vertical metal pickets spaced at 4 inches apart up to 42 inches high (required by building code), but increased spacing above 42 inches to increase views through the fence. This design has been used successfully at the JPA-designed cantilever along Bandy Canyon Road in the San Pasqual Valley.

8. The railing proposed for the Eastern Alignment Alternative along the old bridge/new trail (chain link over the existing wood fence) would block views of the river valley and would be a maintenance burden for the JPA. Instead the existing wood railing should be removed and replaced with simple metal posts/pickets spaced no less than 4 inches apart, and 5 to 6 feet high. In addition, the concrete surface of the existing bridge should be scored to provide for a non-slip surface to safely accommodate horses. Also recommend modify striping shown in the DEIR, to specify bikes on outside lanes (closest to edge) and horses and hikers sharing the inside lanes.

. The Draft EIR does not address the issue of debris potentially becoming trapped by floodwater against the old bridge if retained. Page 1 of the Draft EIR cites insufficient room to pass debris under the existing bridge during flooding conditions; but the Draft EIR fails to address this issue for the preferred alternative, which retains the old bridge.

10. The Draft EIR states that the project would increase flow velocities in the river (page 3.7-19). This change would occur from essentially creating a dam along El Camino Real north of the river forcing floodwaters into the wider channel instead of a more natural sheet flow across the floodplain. Increased flow velocity could also damage the existing bridge, which is not clearly addressed in Section 3.7. The JPA is concerned that we would be vulnerable to lawsuits regarding flood or seismic damage to the old bridge from a change in hydrologic conditions from the project.

11. Section 3.7 of the Draft EIR does not make clear what is proposed to improve flow under the existing bridge if it was retained. Page 3.7-12 states that for all alternatives the

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abutment slopes would be steepened to 1.5:1 to allow the new bridge to convey a 100year storm; but page 2-13 states that for the preferred Eastern Alignment Alternative the "river banks under the existing bridge would not be steepened, only the banks under the proposed bridge". The DEIR does not demonstrate how the 100-year storm situation would be improved for the preferred alternative if the existing bridge is retained without improvements to convey the stormwater. The JPA cannot retain responsibility for a bridge structure that remains vulnerable to flood damage, or that could cause damage to other properties or structures.

- 12. The Draft EIR does not address potential impacts on marsh habitat as a result of increased flow velocity in the river. Page 45 of the Natural Environment Study Report states that "100-year flood velocities with the proposed project would be the same as predicted for existing conditions". This is incorrect, and in fact, the Draft EIR and hydrology study state that 100-year velocities would increase in the river corridor from downstream of the existing bridge to upstream of the new bridge. Please also see comment #13.
- 13. The hydrologic conditions that exist in the project area are critical to the survival of the significant clapper rail population. A detailed study of the hydrologic conditions along this segment of river should be conducted to understand the conditions that allow this endangered species to thrive in this location, and to accurately evaluate impacts to the population from this project. The clapper rails prefer slow-moving and ponding water with stands of emergent marsh vegetation to hide, feed and nest. The Draft EIR must evaluate whether the project would change these conditions. Increasing the cfs or other hydrologic changes could change conditions enough to impact the population. The hydrology should be maintained and also duplicated on the mitigation site to provide conditions favorable to the species. This entire issue is completely missing from the Draft EIR, and is the key to determining the significance of the project's impact on the survival of the clapper rail population.
- 14. All of the proposed alternatives would significantly impact habitat for the clapper rail. The mitigation project should be implemented prior to the impacts occurring for the project to provide substitute habitat opportunities for the rails during the construction disturbance of the river corridor.
- 15. The Clapper Rail population was found primarily under and to the east of the existing bridge. Therefore, the alignment of the preferred alternative to the east would impact more rail pairs than any of the other alternatives and would potential fragment the habitat by cutting off the area west of the new bridge from the habitat to the east. The habitat between the existing and new bridge should also be counted as impacted. The Eastern Alignment appears to have greater permanent impacts to the endangered species than the other alternatives despite the shorter construction schedule.
- 16. The DEIR partially justifies the preference of the Eastern Alignment based on the fact that it would result in fewer impacts to the clapper rails during construction because it reduces the construction period to two seasons instead of three. However, the DEIR does

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October 20, 2006

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- 17/Considering the significance of this population of clapper rails, the project site and mitigation site should both be incorporated into a long-term ongoing monitoring effort. The proposed 5-year monitoring and maintenance period at the mitigation site is inadequate and does not guarantee its success, which should be a long-term preserve to replace lost habitat from the project. The project should implement or at least contribute a fair share contribution to add both areas to long-term monitoring sites. Long-term management should also be required to maintain the existing population (and hopefully a future population at the mitigation site) as is done for other large populations in the state. The need for long-term management to maintain and hopefully recover this species is well documented in the Management and Population Assessment (Zembal et al, 1997) and annual status and distribution reports (Zembal et al).
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- 21. The Draft EIR should address the issue of potentially removing City-owned open space land for new right-of-way needed for the Eastern Alignment. Would there be a net loss of open space? This is not evaluated in the EIR. Any loss of open space should be mitigated, possibly by transferring unused road right-of-way to public open space.
- 22. The paragraph on page 3.1-57 regarding Polo Club lease area should also state that the Coast to Crest Trail (public trail) alignment must also be retained or replaced if impacted.
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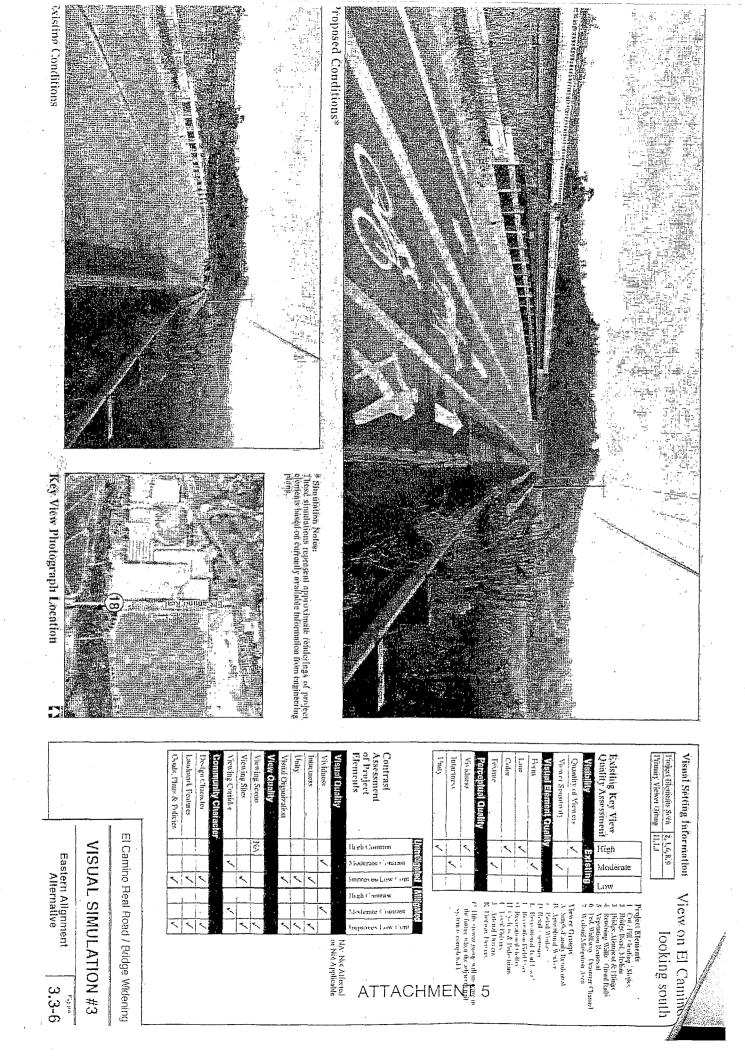
We hope that these comments will be fully discussed and analyzed in a revised Draft EIR for public consideration before any actions are taken on a Final EIR. Please feel free to call Shawna Anderson of our staff should you wish to discuss our comments further. We look forward to continued dialogue with the City on this important project.

Agenda Item 5 October 20, 2006

Sincerely,

Ed Gallo JPA Board Vice-Chair

cc: Jim Waring



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STATE OF CALIFORNIA-THE RESOURCES AGENCY

ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF FISH AND GAME



FACSIMILE TRANSMITTAL

TO: Donna Clark, Environmental Planner City of San Diego Development Services Center Telephone (619) 446-5387 Fax (619) 446-5499

> State Clearinghouse Fax (916) 323-3018

FROM: Libby Lucas South Coast Region 4949 Viewridge Avenue San Diego, California 92123 Telephone (858) 467-4230 Fax (858) 627-3984

DATE: 10/23/06

TIME:

OF PAGES SENT INCLUDING TRANSMITTAL SHEET 20

COMMENTS:

This is the joint comment letter from the Department of Fish and Game and the U.S. Fish and Wildlife Service on the Draft Environmental Impact Report for the El Camino Real Road Widening/ Bridge Replacement Project (SCH# 1999071104). We will also send the City the letter by regular mail, and copies to the cc's by regular mail.

IF YOU DO NOT RECEIVE ALL OF THE PAGES INDICATED PLEASE CALL THE SENDER AS SOON AS POSSIBLE.



In Reply Refer to: FWS-SDG-3236.4 US Fish and Wildlife Service Carlsbad Fish and Wildlife Office 6010 Hidden Valley Road Carlsbad, California 92011 (760) 431-9440 FAX (760) 431-5902



California Department of Fish & Game South Coast Regional Office 4949 Viewridge Avenue San Diego, California 92123 (858) 467-4201 FAX (858) 467-4299

October 23, 2006

Donna Clark, Environmental Planner City of San Diego Development Services Center 1222 First Avenue, MS 501 San Diego, California 92101

Re: Comments on the Draft Environmental Impact Report for the El Camino Real Road Widening/Bridge Replacement Project (SCH# 1999071104)

Dear Ms. Clark:

The California Department of Fish and Game (Department) and U. S. Fish and Wildlife Service (Service) (collectively, "Wildlife Agencies") have reviewed the above-referenced draft environmental impact report (DEIR) for the El Camino Real Road Widening/Bridge Replacement Project, which we received on July 26, 2006. The public review period for this DEIR ends on October 21, 2006, a Saturday. However, on October 18, 2006, you kindly granted the Wildlife Agencies an extension until 5:00 PM on Monday, October 23. We appreciate the extension.

The primary concern and mandate of the Service is the protection of public fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Endangered Species Act of 1973, as amended (Act) (16 U.S.C. 1531 *et seq.*). The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA) and is responsible for ensuring appropriate conservation of fish and wildlife resources including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act (CESA), and other sections of the California Fish and Game Code. The Department also administers the Natural Community Conservation Planning program.

The proposed project would modify the 0.5 mile segment of El Camino Real between Via de la Valle and San Dieguito Road and replace the bridge over the San Dieguito River in order to improve the structural integrity of the bridge, alleviate problems associated with high flood events, improve pedestrian and vehicular access to nearby coastal and recreational resources, relieve traffic congestion, and improve consistency with the adopted land use plan in the project area. Approximately 1,000 feet of Via de la Valle would also be widened to accommodate the new configuration of El Camino Real. The western portion of the project site is within the Subarea II of the Future Urbanizing Area, and the eastern portion is in the Fairbanks Ranch Country Club Community Planning Area. Portions of the project are within the Multiple Habitat Preservation Area (MHPA) of the City of San Diego's (City) Multiple Species Conservation Program (MSCP) Subarea Plan. El Camino Real is upstream of San Dieguito Lagoon and the restoration efforts for the Lagoon under way by the San Dieguito River Park Joint Powers Authority (JPA) Restoration Plan.

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FWS-SDG-3236.1, SCH#1999071104

On December 12, 2002, we sent the City a comment letter on the notice of preparation (NOP) of a draft environmental impact report / environmental assessment for the project. From April 10, 2002, through October 25, 2005, we attended several meetings coordinated by the City of San Diego (City) on the proposed project. We also corresponded with the City through many electronic mails, providing feedback on the subjects addressed at the meetings and on the minutes for the meetings.

We appreciate the City's efforts to resolve major issues related to the potential project-related biological impacts prior to preparation of the DEIR, so that the document circulated for public review would reflect avoidance and mitigation measures that satisfy the requirements and recommendations of the Wildlife Agencies and other resource agencies (*e.g.*, California Coastal Commission, Regional Water Quality Control Board, U.S. Army Corps of Engineers). However, as the DEIR acknowledges, there are several outstanding matters that remain to be resolved through further coordination and consultation with the agencies. From our perspective, the primary outstanding matters are the project-related (a) potential negative impacts on the Federal and State endangered light-footed clapper rail (*Rallus longirostris levipes*, clapper rail), also a State Fully Protected Species, and (b) proposed wetland mitigation.

For the City's preferred alternative (*i.e.*, the Eastern Alignment Alternative, EAA), the new bridge would be set on a diagonal, completely separate from the existing El Camino Real bridge. The west edge of the new bridge would be approximately 50 feet east of the existing bridge at the south end, and approximately 90 feet east of the existing bridge at the north end. The new bridge would be 354 feet long, approximately 14 feet longer than the existing bridge, and 94 feet wide and would have two sets of three piers each. By comparison, the existing bridge is 340 feet long and 27 feet wide and has eight piers.

The EAA is the only build alternative for which the existing bridge would be retained and vacated by the City to the JPA for non-vehicular use as a trail for pedestrians, equestrians, and bicyclists. Changes to this bridge would be minimal. The new bridge for the EAA would also have pedestrian walkways and bike lanes in the road and bridge cross section.

As with all the build alternatives, the river banks under the new bridge would be excavated to have a steeper slope than currently exists. The steeper bank slopes would be protected from erosion by rip rap that would be toed into the river bed. The steep slopes and bridge shading would prevent successful planting of open stabilization materials, so such materials are not proposed for the new bridge abutments. The existing rip rap under the river bed that currently protects the sewer pipeline would be replaced if it were disturbed by construction. The river banks under the existing bridge would not be steepened.

As with all except one of the six build alternatives, the EAA would provide a JPA multi-use trail crossing under the north bridge abutment. The trail platform would be set at the 10-year flood level (approximately 13 feet above mean sea level). The under crossing would be paved, and would be approximately 12 feet wide. It would connect to the existing public trail along the north bank of the river east of El Camino Real, and the planned Coast to Crest Trail alignment on the north bank of the river west of El Camino Real.

In addition to the clapper rail, the sensitive wildlife species within the project's area of potential effect include least Bell's vireo (*Vireo bellii pusillus*, a Federal and State endangered species, vireo), white-tailed kite (*Elanus leucurus*, a State Fully Protected Species), American bittern (*Botaurus lentiginosus*), and the following State Species of Special Concern: yellow warbler (*Dendroica petchia*), Vaux's swift (*Chaetura vauxi*), white-faced ibis (*Plegadis chihi*), and northern harrier

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FWS-SDG-3236.1, SCH#1999071104

(*Circus cyaneus*). Of these, yellow warbler and the clapper rail are known to nest within the project alignment. While the clapper rail is an MSCP-covered species, the Federal MSCP permit does not authorize harm or lethal take for the species. And, since the clapper rail is a State Fully Protected Species, take authorization from the State is not feasible.

The losses of sensitive habitats associated with the EAA include the following: 4.57 acres of wetland habitats, over half of which are occupied by clapper rail; and 0.77 acre of coastal sage scrub (no habitat occupied by the coastal California gnateatcher). The DEIR proposes to mitigate for the losses of wetland habitats by the construction, creation, and enhancement of wetland habitats to the west of (*i.e.*, downstream) El Camino Real on the JPA's property (formerly the Boudreau property) and along the San Dieguito River. The DEIR provides considerable detail about the phases of the construction and creation of the proposed wetland mitigation habitats (*i.e.*, coastal brackish marsh, riparian scrub, and high salt marsh). Among the other biological mitigation measures included in the DEIR are the following, most of which pertain to project construction.

- a. Regardless of the alternative built, no construction would occur within the River corridor during the breeding season of the clapper rail and vireo (February 15 to September 15).
- b. Noise from construction activities outside of the River corridor would be prohibited from exceeding 60 dBA at the River corridor during the breeding seasons of the clapper rail and the vireo.
- c. Outside of the breeding seasons, construction in the River would occur during daylight hours.
- d. All construction equipment would be removed from the wildlife corridor at the end of each construction day.
- e. Staging areas and storage areas for equipment and materials would be located outside of the River.
- f. Temporary construction lighting has not been proposed as part of the project.
- g. A qualified biologist would train the construction crews and field workers to avoid unnecessary impacts to biological resources in the area.
- h. Prior to the start of construction, the project biologist would supervise the placement of orange construction fencing or equivalent along the limits of disturbance within and surrounding sensitive habitats as shown on the approved plans to protect adjacent environmentally sensitive lands including sensitive upland and wetland habitat.
- i. All construction activities (including staging areas) shall be restricted to the development areas as shown on the approved plan. A qualified biologist would monitor all phases of the construction to minimize impacts on sensitive species, and ensure that the construction activities do not encroach into biologically sensitive areas beyond the limits of disturbance as shown on the approved plan.
- j. If unauthorized disturbances occur or sensitive biological resources are discovered that were not previously identified on the Landscape Construction Documents and/or the revegetation/restoration monitoring exhibit, the contractor would be directed to temporarily

divert construction in the area of disturbance or discovery and immediately notify the appropriate people.

k.

After completion of construction, permanent low-sodium lighting would be installed along the El Camino Real bridge, and directed away from the MHPA and areas that might be used for wildlife movement.

To assist the City in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources, and to assure that the project is consistent with the City's MSCP Subarca Plan, we offer our recommendations and comments in the Enclosure. The comments and recommendations are based on the information provided during the meetings we attended, the minutes from those meetings, our previous correspondence with the City (cited above), our knowledge of sensitive and declining vegetation communities in San Diego County, and our participation in regional conservation planning efforts. In summary, our primary comments address the following: (1) consultation between the City and the Wildlife Agencies; (2) need to revise the DEIR and recirculate it for public review; (3) future management of the reach of San Dieguito River upstream of El Camino Real; (4) construction-related impacts to the clapper rail during and outside of the breeding season; (5) reducing and re-quantifying the loss of clapper rail habitat; (6) inadequate analyses of the post-construction impacts on the clapper rail, including impacts from the projectrelated hydraulic and hydrologic modifications, and the proposed equestrian trail; (7) concerns about the proposed wetland mitigation and alternatives to consider; and (8) the need to resolve the matter of the Fairbanks Ranch Country Club's wetland mitigation obligations per the 1981 EIR, prior to proceeding with the proposed project.

The Wildlife Agencies appreciate the opportunity to comment on this DEIR. We are hopeful that further consultation between the City and us will ensure the protection we find necessary for the biological resources that will be affected by this project. Please contact Libby Lucas of the Department at (858) 467-4230 or Kurt Roblek of the Service at (760) 431-9440 if you have any questions or comments concerning this letter.

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Therese O'Rourke Assistant Field Supervisor U.S. Fish and Wildlife Service

Sincerely,

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Michael J. Mulligan for Deputy Regional Manager California Department of Fish and Game

Enclosure

cc: California Coastal Commission (Ellen Lirley)

Department of Fish and Game (Marjorie Caisley, Libby Lucas, Kris Vyverberg, Tamara Spear) Federal Highways (Steve Healow)

Regional Water Quality Control Board (Mike Porter)

- San Dieguito River Valley Conservancy (Craig Adams)
- U.S. Army Corps of Engineers (Stephanie Hall)
- U.S. Environmental Protection Agency (Elizabeth Goldmann)
- U.S. Fish and Wildlife Service (Carolyn Lieberman)

Wildlife Agency Comments and Recommendations on the Draft Environmental Impact Report for the El Camino Real Road Widening/Bridge Replacement Project, San Diego, California

Our comments and recommendations are not in order of priority, but rather in chronological order, with pre-construction considerations first, followed by considerations related to the construction period, followed by post-construction considerations.

PRE-CONSTRUCTION

Consultation with the Wildlife Agencies

1. As the DEIR indicates, it is likely that the effects of the proposed project on light-footed clapper rail (clapper rail) and least Bell's virco (virco) will require Section 7 consultation under the Act. The DEIR also indicates that the City contemplates applying to the Department for authorization for take of clapper rail under CESA, specifically section a 2080.1 of the Fish and Game Code. Because the clapper rail is a State Fully Protected Species, the Department cannot authorize its take. It is essential that the project result in no take of this species, and why, the continued pre-project consultation is critical.

2. As evidenced by the ensuing comments and recommendations, there are many matters that remain to be resolved for the project to proceed. Among the matters we wish to discuss in depth during further consultation are:

- a. the feasibility of the Central Alignment Alternative (e.g., the duration of the construction);¹
- b. the project-related impacts on the clapper rail and measures to avoid or minimize the impacts (see comments under the During Construction and Post-Construction sections);
- c. the proposed wetland mitigation (see comments under the Post-Construction section); and,
- d. the methodology and biological implications of the hydraulic and hydrologic studies conducted for the project (see comments under the Post-Construction section).
- 3. We do not yet have enough information to determine, with the exception of the No Build Alternative, which of the alternatives would have the least significant biological impacts. We must consider the impacts of the demolition of the existing bridge, both during and after its demolition. In this regard, we request some elaboration. Our understanding is that the EAA is the only build alternative that would not involve the demolition of the existing bridge. If the bridge is not demolished, please (a) clarify whether any structural changes

¹ The Central Alignment Alternative would have the same design as the EAA, but it would be centered on the existing alignment of El Camino Real, and would affect adjacent properties on the east and west sides relatively equally

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would be made to the deck or supporting structure, and (b) reconcile the retention of the bridge as is with the following statements in the DEIR which indicate that it needs to be removed or rebuilt: "the existing bridge does not completely convey the 100-year flood. Debris in the river carried during a large flood event could be trapped at the bridge, further decreasing capacity. Debris and flood flows could also damage the gas pipeline mounted on the bridge. Therefore, the entire bridge should be raised above the 100-year flood level" (page 1-4).

4. We would like to discuss with the City the possibility of (a) extending the existing MHPA designation along the San Dieguito River west of El Camino Real to the reach of the River east of El Camino Real (*i.e.*, so that the MHPA to the east of El Camino Real includes both the River and Gonzales Canyon), (b) developing and preparing Area Specific Management Directives for the clapper rail within this reach of the River, and (c) ensuring adequate funding to manage for this species. We may determine such measures to be necessary (in addition to other mitigation measures) if we are unable to determine during our consultation whether the project will result in significant indirect effects to the clapper rail.

Need to Revise the DEIR and Recirculate it for Public Review

5. Without sufficient information to support the conclusion, the DEIR concludes that there would be no project-related direct impacts on the clapper rail. As to indirect impacts on the species, the DEIR provides no discussion or analysis, but states, "potential indirect impacts to sensitive wildlife species would be significant but mitigable." The DEIR correctly states, "it is anticipated that ... [the Wildlife Agencies] will require further assessment and documentation of the potential project impacts" on the clapper rail. However, since the indirect impacts alone on the clapper rail may be significant (even with mitigation), the lack of any analysis in the DEIR for these impacts, with the exception of the direct loss of occupied habitat, undermines the basic purposes of CEOA. These purposes include, but are not limited to the following: (a) informing governmental decision-makers and the public about the potential, significant environmental effects of proposed activities; (b) identifying the ways that environmental damage can be avoided or significantly reduced; and (c) preventing significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible [CEQA Guidelines, section 15002(a)]. Deferring a thorough analysis of the direct and indirect impacts on the species until further consultation with the Wildlife Agencies is inappropriate. Given the protected status of the clapper rail and the importance of this population as a whole (see comment #7), the clapper rails within the project's area of potential effect warrant a thorough impact analysis and full mitigation for all significant impacts, both of which the DEIR lacks.

Based on the foregoing and ensuing comments and recommendations, we recommend that the information provided by the City to the Wildlife Agencies upon our request during the course of our consultation, be included in a revised EIR to be recirculated prior to certification for public review pursuant to Section 15088.5 of the CEQA Guidelines. This would be particularly appropriate, for example, if the consultation reveals a feasible project alternative or mitigation measures considerably different from those previously analyzed that would clearly lessen the environmental impacts of the project, but the City declines to adopt them [CEQA Guidelines, Section 15088.5(a)(3)]. While it is common for

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- consultations with the Wildlife Agencies to generate a level of detail (on project impacts and mitigation) not typically expected of or provided by CEQA documents, this recommendation derives from the lack of basic impact analyses in the DEIR, analyses needed to conform to CEQA. The revisions to the DEIR to be recirculated should reflect the impacts discussed during the consultation and provide (a) updated analyses of the project-related biological impacts for each alternative, and (b) additional measures necessary to mitigate the impacts to a level less than significant, including modifications to the proposed wetland mitigation.
- 6. Due to the high probability of project-related adverse effects to several pairs of clapper rails, the proposed loss of clapper rail habitat (including the southern willow scrub and the mulefat scrub adjacent to the occupied marsh see comment #9) should be offset prior to commencement of the project components that would result in the loss. The creation and enhancement of clapper rail habitat will take a number of years to mature and thus provide the basic constituent elements for this species (*e.g.*, cover, prey, refuge etc.). Therefore, it is imperative to the continued success and survival of clapper rails in the area that compensatory creation and enhancement occur prior to the destruction of their habitat to minimize the temporal loss of its functions and values. Ideally, this would occur at least two growing seasons prior to project-related impacts.²

DURING CONSTRUCTION

Light-footed Clapper Rail (clapper rail)

7. During a focused survey conducted in 2006, an estimated 31 pairs of clapper rail were detected within the approximately mile-long reach of the San Dieguito River between El Camino Real and the Morgan Run Gold Course upstream of the bridge to the east (Zembal et al., 2006). Citing John Konecny as the source of the information, the report entitled Natural Environment Study Report for the El Camino Real Road/Bridge Widening Project (Tierra Environmental Services, June 13, 2006; biology report) indicates that there were also four to five pairs reported west of El Camino Real in 2006, while another source informed the Department that there were one pair and three single males west of the bridge (D. Zembal, pers. comm., electronic mail, April 3, 2006).

The biology report suggests that results of surveys conducted east of El Camino Real since 2004 indicate that the clapper rail population in the area has expanded rapidly. We are not aware of data that demonstrates that the population east of El Camino Real has expanded rapidly. It is not known how long or at what density clapper rails have occupied the reach of the San Dieguito River east of El Camino Real.³ Our understanding is that formal

² In an electronic mail dated November, 28, 2004, to Katherine Hon and copied to several people, the Department stated, "given that the project is likely to potentially affect the clapper rail, it would be best to have the mitigation in place prior to commencement of construction."

³ As described in the report entitled Status and Distribution of The Light-fooled Clapper Rail in California, 2006 (Zembal e al., 2006), from 2004 through 2006, the surveys encompassed progressively longer reaches of the River, until in 2006, they incorporated occupied habitat not previously surveyed southeast of the Morgan Run Golf Course. Clapper rails may have been in this reach of the River prior to its re-alignment for the Fairbanks Ranch Country Club (FRCC). The 1981

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focused surveys for the clapper rail were not conducted along the reach of the San Dieguito River east of El Camino Real prior to 2004. This recently discovered subpopulation of clapper rail is the third largest in the state and the largest ever recorded in a freshwater marsh (Zembal *et al.*, 2006). It is critical that the population be protected. The following comments address some of our concerns about impacts on the clapper rail during construction.

- a. We are concerned about the negative impacts on the clapper rail that might occur during the construction of the project, both during and outside of the species' breeding season. Such impacts include, but are not limited to, (a) direct impacts such as injury or death of a clapper rail, and (b) indirect impacts such as (i) disruption of breeding activities, (ii) disruption of daily activities such as foraging, (iii) displacement, (iv) resultant reduced genetic diversity among the clapper rails within the area, and (v) reduced productivity among the displaced individuals in subsequent breeding season(s). As the DEIR mentioned none of these, much less analyzed them, it will be necessary to discuss these in depth during the future consultation, and address them in the revised and recirculated DEIR.
- b. As the clapper rail is a resident species, we do not believe that the measures proposed for implementation during project construction are adequate to avoid impacts on the species either during or outside of the breeding season. And, depending on the definition of "river corridor," the proposed prohibition of construction activities within the river corridor during the breeding season may not be sufficient to protect the clapper rail from significant impacts.
- c. The potential effects, if any, on the clapper rail of the ground vibrations from driving the piles to a depth of 90 feet requires consideration.
- d. Construction-related noise is one aspect of the construction of concern to us, and the proposed noise controls during the breeding season may not be sufficient to protect the clapper rail from significant impacts. The DEIR indicates that peak noise levels may be 85 to 90 A-weighted decibels (dBA) at a distance of 50 feet during most construction activities, and hourly average noise levels at 50 feet from the edge of the work area would be anticipated to be 70 to 80 dBA Leq.⁴ According to the DEIR, construction noise levels at 50 feet of approximately 80 dBA Leq would be expected from work on the roadway, and noise levels of approximately 86 dBA Leq would be expected from work on the bridge. The distance to the threshold noise level of 60 dBA Leq would be a radius of 500 feet from a point source on the roadway, and 1,000 feet from a point source on the bridge. Appropriately, the DEIR prohibits construction activities that would generate 60 dBA Leq within the noise contour of 1,000 feet of the river during the avian breeding season. We wish to discuss the construction-related

Final Environmental Impact Report for the FRCC does not include them in the list of species within the River, but the species list is clearly incomplete.

4 Examples of common outdoor noise levels are (a) 80 dBA at a distance of 50 feet from a diesel truck going 50 mlles per hour, (b) 100 dBA at a distance of 3 feet from a gas lawn mower, and (c) 110 dBA at a distance of 1,000 feet from a jet fly-over (DEIR, pages 3.11-1 and 3.11-2).

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noise during the consultation, specifically, (a) what "river corridor" means, (b) what peak levels might occur within the 60 dBA Leq standard, (c) noise generated by the pile driving to a depth of 90 feet, and duration of the noise, and (d) what measures will be necessary to adequately attenuate noise levels outside of the breeding season.

- e. We recognize that a biological advantage to the EAA is that its construction would span two breeding seasons, while the construction of the other build alternatives would span three breeding seasons. This aspect of the EAA, relative to the other build alternatives, would be beneficial to the clapper rail and other sensitive species in the project vicinity. However, we wish to further discuss with the City the Central Alignment Alternative (CAA), and the expected duration of construction of the bridge and the road segments north and south of the bridge for both the EAA and the CAA.
- f. The DEIR requires that the biologist responsible for construction monitoring have a minimum of a Bachelor's degree in biology, botany, or related science and will have at least two years of experience in monitoring native habitat restoration projects in southern California. We request that the biologist have experience in surveying for clapper rail and be knowledgeable about the species' requirements and behaviors.
- g. The breeding season for the clapper rail should be considered to be February 15 through September 30.

Habitat Losses

- 8. In the event that the EAA remains the City's preferred alternative and the one that is built, the Wildlife Agencies would like to discuss the possibility of reducing its width, and thereby reduce it biological impacts. As the City proposes it, the EAA would retain the existing bridge, which would be dedicated to non-vehicular use as a trail for pedestrians, equestrians, and bicyclists. The new bridge is also proposed to have pedestrian walkways and bike lanes. While we understand that some space is necessary to accommodate drivers of broken-down vehicles, it is not evident that all the space provided is necessary. Nor is it clear why, given the proposed trail on the existing roadway and bridge, bike lanes are proposed for the new bridge and roadway. Eliminating the non-vehicular amenities (*i.e.*, bike lanes) from the new bridge would reduce its footprint and reduce its direct impacts to the habitats and species present.
- 9. The Wildlife Agencies believe that the DEIR underestimates the project-related loss of clapper rail habitat. Table 3.12-8 on page 3.12-44 of the DEIR indicates that the EAA would result in the loss of 0.77 acre of clapper rail habitat, comprised solely of disturbed coastal brackish marsh. When seeking refuge from high flows (Zembal *et al.* 1989, Shuford 1993) or seeking out alternative forage (*e.g.*, grasshoppers), clapper rails will use riparian and upland habitat adjacent to the habitats supporting the emergent vegetation in which they reside. Although used infrequently, this habitat may be extremely important at reducing mortality during high flows. It is possible that, during the heavy flows of the 2004-2005 rainy season, the clapper rails in the marsh to the east of El Camino Real used the adjacent habitat along the northern bank of the San Dieguito River to escape the flows. Because such habitat is important to clapper rails we consider it as clapper rail habitat.

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Therefore, the southern willow scrub (0.10 acre), and the disturbed mulefat scrub (0.40) within the EAA alignment and adjacent to the occupied disturbed coastal brackish marsh should be added to the 0.77 acre of clapper rail habitat (*i.e.*, the total should be 1.27 acres).

10. It is not clear from the DEIR whether the impacts from the proposed 500 feet of buried bank protection on the eastern side of the bridge are included in the impact analysis. Figure 3.12-5 depicts the outline of impacts associated with the EAA; however, impacts from the bank protection are not shown. Please revise all applicable figures to reflect the location of the bank protection, analyze the acreage and habitat types affected by the bank protection, and provide appropriate mitigation.

11. In a May 12, 2004, electronic mail to Katherine Hon and copied to several people, the Department inquired as to the status of the CEQA review for the JPA's undercrossing for equestrian use. The electronic mail stated the following.

If it has not yet gone through CEQA, it would be appropriate for the Bridge Replacement Project and the equestrian trail (at least the portion of it within the area of potential effect of the Bridge Replacement Project) to be considered under the same CEQA analysis (and NEPA if the trail is funded by federal sources). Since the design of the proposed bridge is affected by the need for the undercrossing (and possibly vice versa), these projects are definitely related and warrant concurrent CEQA analysis per Section 15003(h) of the CEQA Guidelines which states, "The lead agency must consider the whole of an action, not simply its constituent parts, when determining whether it will have a significant environmental effect..." If the equestrian trail has already gone through CEQA, the CEQA/NEPA document for the Bridge Replacement Project should discuss what, if any, aspects of the proposed bridge the approved alignment/design of the trail dictates.

We have no record of receiving a response to this electronic mail. Our concerns about piecmealing remain as it is not clear whether the direct losses of sensitive habitats, or any related impacts (see comment #16), from the proposed multi-use trail under the bridge were accounted for in the impact analysis. Please provide a quantification of the habitat losses and, if they had not already been accounted for, increase the mitigation obligations accordingly.

12. The DEIR discusses the parcels that the project may affect (page 3.1-3). One of these (APN 302-090-28, PIF# 10) is a parcel whose development was the subject of a CEQA document (mitigated negative declaration, MND) the City circulated in December of 2004. The project name was Villa Paraiso and the Wildlife Agencies commented on the MND. Our understanding is that approval of the project was conditioned on meeting several requirements to protect the sensitive wetlands on site. Please explain (a) how, if at all, the widening of Via de La Valle would affect the ability of the Villa Paraiso project to meet its obligations to enhance and protect the on-site wetlands and/or (b) how the widening of Via de La Valle would exacerbate the impacts for which the measures to protect wetlands were imposed, and (c) how the detrimental effects would be mitigated.

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POST-CONSTRUCTION

The two primary concerns we have about the post-construction aspects of the project are (a) 13. the potential for short- or long-term type change or diminution in value of clapper rail habitat resulting from project-related hydrologic and hydraulic effects, and (b) the adequacy of the proposed wetland mitigation areas and plans.⁵ Though hydrologic and hydraulic studies were conducted for the project, the analyses therein were not used to assess potential impacts on clapper rail habitat. Nor does the DEIR provide such an assessment, which we requested in our NOP comment letter. In an effort to determine whether the studies provide sufficient information to make such an assessment, Senior Engineering Geologist (Kris Vyverberg) and Associate Hydraulic Engineer (Marjorie Caisley), both with the Department, reviewed the document entitled Hydraulic Study for El Camino Real Bridge Project on the San Dieguito River (Rick Engineering Company, April 2006; Hydraulic Study) and pertinent excerpts from the DEIR. Their review generated several comments and questions, responses to which will influence our determination as to the adequacy of the proposed locations and designs of the wetland mitigation areas, and as to whether the Eastern Alternative or the Central Alignment Alternative would be less biologically damaging.

In general, Ms. Vyverberg and Ms. Caisley found that the hydraulic study does not provide sufficient information or analysis for a meaningful evaluation of the environmental consequences of the proposed project. More specifically, in the absence of the information outlined below, the impact of this project on the habitat supporting the clapper rail population cannot be determined within the project's area of potential effect. Our review suggests that there could be changes in water depths, water velocities, and the physical form of the channel all of which collectively define the physical habitat the rails depend on. In fact, the DEIR indicates that upstream of the River. The information necessary to determine the magnitude of change to this habitat and the associated potential effects to the clapper rail has yet to be provided; and in its absence, the proposed project should be assumed to be a threat to the population. Specifically, the additional information and analyses required for a meaningful evaluation of the environmental consequences of the proposed project, and to assess the adequacy of the proposed wetland mitigation area, are outlined below.⁶

a. An explanation is needed for why the piers of the existing bridge are modeled in an unconventional manner and differently from the method used for the new bridge. The piers have been coded as ground points rather than as bridge piers [Appendix A, HEC-RAS Output for the Existing Conditions, page 4, figure for River Station (RS) 2.614, and pages 15-16, HEC-RAS Project Data, Hydraulic Study, April 2006]. Accounting for the hydraulic influence of piers in this way likely results in greater channel

⁵ Though we provide these comments in the Post-Construction section, the mitigation for the losses of clapper rail habitat should occur prior to the completion of project construction, as addressed in comment #6.

⁶ Ms. Vyverberg and Ms. Caisley did not have the entire DEIR available for review. Their comments are provided here in their entirety, but there may be information that they request that is available in the DEIR.

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roughness values, reduced channel capacity, and increased water surface elevations than would be expected from a conventional approach.

- b. A discussion is needed on the discrepancy between upstream locations and the water surface elevations (WSE) at section 2.439. The WSE is higher downstream at section 2.439 than at the two sections immediately upstream for the 50- and 100-year recurrence interval events (HEC-RAS Work Map for the Preferred Alternative, Map Pocket 2, Hydraulic Study, Appendix B, HES-RAS Output for the Preferred Alternative, page 3, River Stations 2.59, 2.524, and 2.439). This may be an error in modeling or perhaps an incorrect accounting of flow exiting the channel over the weir and into the wetland area.
- c. Clarification is needed on the ineffective flow area selected for the proposed conditions downstream of the new bridge in the wetland mitigation area. The ineffective flow area on the left bank of RS 2,439 appears to be incorrectly located at station 4220; the berm is actually located at station 4620 (Appendix B, HEC-RAS Output for the Preferred Alternative, page 7, RS 2,439, and HEC-RAS Work Map for the Preferred Alternative, Map Pocket 2, Hydraulic Study). Ineffective flow boundaries define bodies of ponded or recirculating water (e.g., eddies downstream of structures) that are not contributing in a meaningful way to the overall conveyance of the flow downstream. Locating the ineffective flow boundary at station 4220 suggests graphically and hydraulically that the effective channel cross section is wider than it actually is. The net result of using a wider channel than actually exists is artificially improved hydraulics through and downstream of the proposed bridge.
- d. The following information is needed on the hydraulic performance of the proposed weir structures, which otherwise cannot be evaluated from the information provided:
 - (i) the water surface elevations in the wetland at the range of flow events being considered (*i.e.*, low flow undefined in the report, and the 10-, 20-, 50-, and 100-year recurrence interval events);
 - (ii) clarification on whether the weir coefficient in the equations was adjusted to reflect that the weirs are submerged at the 50-and 100-year recurrence interval flow events;
 - (iii) clarification on whether the energy between the flow over the weir and the flow remaining in the channel were balanced when determining how much flow was left in the channel; and,
 - (iv) clarification on which of the two values reported for weir flow is correct, and a discussion on the difference between the values as determined by the Fluvial-12 model [e.g., 7,864 cubic feet per second (cfs) at the peak 100-year flood discharge] versus those determined using the HEC-RAS model (9,385 cfs, Appendix B, page 3, Reach-1, RS 2.59).
- e. The following information is needed on the design and hydraulic function of the wetland mitigation area, the effectiveness of which cannot be evaluated otherwise:

Enclosure page 9 of 15

- (i) a discussion on the discrepancy between the design of the inlet to the wetland mitigation area as specified in the Hydraulic Study [*i.e.*, six 5-foot reinforced concrete pipe (RCP) culverts versus the single 3-foot RCP culvert specified in the main body of the report (respectively, Attachment 2, page 14 of the Hydraulic Study versus Section 5, Brackish Marsh Mitigation Area Hydraulics, paragraph 2, page 10 and Figure 3.12-6, El Camino Real Mitigation Concept Plan];
- (ii) the location of the River at any given flow relative to the location of the proposed inlet;
- (iii) the flow event at which the inlet becomes active and water begins to flow into the wetland area;
- (iv) the range of flows over which the wetland is inundated, to what depths, and for what period of time;
- (v) the typical water surface elevations in the wetland under normal, non-flood conditions; and,
- (vi) the effect that the radical change in the recommended inlet size will have on wetland operation and function.
- f. A complete scour analysis is needed of the proposed structures on bed and bank erosion. The hydraulic study uses a proprietary model (Fluvial-12, Chang 1988) not generally available to us to evaluate changes in general stream scour conditions associated with the proposed project. No evaluation of the local scour associated with local obstructions to flow by a bridge pier or abutment is provided. An evaluation of project-related impacts on bed and bank erosion and the impact of such erosion on the integrity of the physical habitat requires the following information.
 - (i) A transparent consideration is needed of general scour effects using a nonproprietary and standard model (such as HEC-RAS) and the methods described in Hydraulic Engineering Circular No. 18 (HEC-18, Evaluating Scour at Bridges, FHWA, 2001). HEC-18 presents the state of knowledge and practice for the design, evaluation and inspection of bridges for scour. A scour analysis using the methods in HEC-18 may also be required if the proposed project uses federal funds.
 - (ii) An analysis is needed that considers the project-related effects on general as well as local scour conditions, including the influence of debris and impinging flows. The DEIR indicates that the height of the bridge will be 3-feet higher than the elevation otherwise required to pass the 100-year recurrence interval (Section 2.2.11, page 2-16), but neither the DEIR nor the hydraulic study address whether the height of the water surface elevation includes any consideration of the confounding influence of flood debris on freeboard calculations.

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- g. Consideration is needed of the potential influence of tidal flux on the hydraulic performance of the proposed structure and river channel. Although this may have been considered and determined to be of no engineering or biological consequence, there is no mention in the various project documents of any consideration given to the effect (if any) of storm tides on the proposed design.
- h. Consideration is needed of a project alternative that includes a longer bridge span. The span length of the proposed bridge is essentially the same width as the existing bridge (355 feet and 340 feet, respectively) even though the possible effective width of a new structure located 75 feet upstream could be 490 feet long. The proposed span length results in an undersized bridge opening and higher water velocities and stream channel scour that the project proponents address by over-steepening the stream banks to increase the capacity beneath the bridge. Lengthening the bridge span will provide a larger capacity opening beneath the bridge, will reduce local scour, eliminate the need to line the channel beneath the bridge with rock, eliminate the need for rip rap on the banks, and allow the banks beneath the bridge to be laid back to a slope flatter than the 1.5:1 slope proposed.

Locations of the Proposed Wetland Mitigation

14. One of the main subjects of discussion during the meetings the City held on the proposed project was the mitigation for the project-related losses of wetlands. The locations of the proposed mitigation for the loss of southern willow scrub and mulefat scrub (*i.e.*, along the southern bank of the River, just downstream of El Camino Real) appear acceptable as the mitigation that occurs there may adequately meet the compensation requirements for losses of acreage, functions, and values (*e.g.*, providing vireo habitat and fringe clapper rail habitat). However, though the gaps in the habitat have been lessened based on previous discussions, it is not clear whether these areas would remain in their current state (*i.e.*, disturbed and agriculture) or if there can be further modifications to actively restore them to provide greater contiguity to the other proposed mitigation areas.

The brackish marsh habitat proposed as mitigation would occur southwest of the bridge and result in an 11.35-acre area being converted from tomato fields. The area would be surrounded on two sides (north and west) by berms approximately 14 feet tall (final grade) with 10-foot wide tops. A 100-foot buffer of upland vegetation and the existing El Camino Real would create the eastern and southern boundaries. The area would receive fresh water from the San Dieguito River during lesser flows via a 36-inch corrugated pipe, and during larger events a spillway would allow for overflow into the area. The enclosed cell surrounded by berms and roadway on all sides would be an artificial system with little biological connectivity. A ramp is proposed for clapper rail access across the berm; however, clapper rail usage of this type of access is unknown.

The likelihood of the success of creating and managing brackish marsh habitat in an area which does not experience tidal influence and relies on saline soils to mimic salt water presence is questionable. There is a high potential for type conversion as the salts leach from the soils over time. The project area does not experience tidal influence due to (a)

Enclosure page 11 of 15

historical changes in the watercourse itself (primarily channelization), (b) year-round freshwater flows (versus primarily in the winter only), and (c) frequent blockage of the River's mouth. The brackish marsh creation area would receive flows (freshwater only) after precipitation events large enough to allow flow into the corrugated metal pipe and over the inlet weir. Brackish and salt marsh habitat is regularly inundated in sequence with the tidal prism at some point in time, whereas tidal influence may never reach this far upstream again.

San Dieguito River will become further channelized with the presence of a berm on the southern bank of the River and the construction of a larger bridge within the 100-year floodplain. Considerable channelization has already occurred in this system; as the DEIR states, "the area was generally wetlands (swamps, and overflow lands and tidelands) and a braided river channel." Channelization of watercourses may provide a human benefit by temporarily alleviating flooding and loss of property, but throughout the country this practice has resulted in inestimable losses of wetland habitats, functions, and values. Restoration of riparian corridors almost always involves reconnecting the floodplain/ geomorphology as the arteries of the system. The proposed artificial means of creation may provide habitat for a certain target species; however, as a whole, the River system will be further degraded.

As to the suitability of the proposed location of the mitigation for the loss of clapper rail nesting habitat, the transmission towers and lines within the utility corridor adjacent to the western boundary of the mitigation area must be considered. They likely serve as perches for raptors which prey on clapper rail chicks, which also renders the mitigation area inappropriate.⁷ The presence of the utility corridor, especially the underground lines, could hamper any wetland restoration efforts by leaving a barrier (*i.e.*, a berm to protect the underground lines) across the floodplain after excavation for the restoration. Removal or other means of lessening the impacts of the utility corridor must be considered if high value and naturally functioning wetlands in this area are to be restored.

The high salt marsh mitigation area is located west of the proposed brackish marsh site. The two sites are separated by SDG&E's right-of-way. The DEIR provides very little information on the specifics of this mitigation site. It appears that the area would be excavated to create a 3-acre depression, but it is unclear how the area would be inundated or connected to river flow, tidal regimes, or groundwater. This mitigation area would be surrounded by agriculture, and it appears it would have no connection to the proposed or existing native habitats.

The future discussions regarding the questions above on the hydraulic and hydrologic studies should inform us about certain aspects of concern to us about these mitigation plans. In addition to other mitigation options mentioned in this letter, mitigation

⁷ The JPA property is split diagonally by a 150-foot wide utility corridor running southeast to northwest between El Camino Real and Via de la Valle. The utility corridor is controlled by San Diego Gas and Electric (SDG&E). In addition to the high voltage steel transmission towers are within the utility corridor above ground, there are three pipelines below ground. The pipelines carry fuel and high-pressure gas.

approaches that better complement the ongoing restoration efforts in San Dieguito Lagoon/River should be considered.

15. The Wildlife Agencies have repeatedly indicated that some of the mitigation for the projectrelated loss of wellands and clapper rail habitat should occur along the northern bank of the San Dieguito River starting immediately upstream of the existing bridge, and we have requested that any outstanding issues regarding the previously required mitigation in this area be resolved before the City proceeds with this project.

Per the 1981 Environmental Impact Report (EIR) for the Fairbanks Ranch Country Club (FRCC), part of the FRCC's mitigation obligation was to create an area of riparian vegetation along the northern bank of the San Dieguito River. The approximately 1700-foot long mitigation area along the bank was to have averaged 250-350 feet in width, occupying over nine acres.⁸ This area is roughly depicted in the figure at the end of this Enclosure. During the April 4, 2005, meeting held by the City, the City explained that its 26-year lease of the City lands to the Polo Club Fields (*i.e.*, the leasehold adjacent to the northern bank of the San Dieguito River) which commenced in 1986 does not reflect the mitigation on the property referenced in the FRCC EIR. The City also noted that the failure of FRCC to carry out the required mitigation for the 1981 project is a code enforcement issue, and that the City would investigate it. We would like to discuss what actions, if any, the City has made to resolve this matter.⁹

We understand that the projected increase in the 100-year velocities upstream of the proposed bridge require stabilization of the north bank of the San Dieguito River, and that this may impair efforts to provide mitigation along the north bank. However, we wish to further discuss this potential mitigation location with the City. We also request clarification on the following statement in the DEIR (page 3.7-27, Mitigation Measure 7.1), "the slope would be refilled and re-contoured and revegetated with native coastal sage scrub plant materials." This seems to conflict with information that the proposed riprap area would not be vegetated.

16. As addressed in comment #11, it is not apparent from the DEIR that the City analyzed the indirect (or any) impacts from the JPA's proposed trail under the bridge. Among the related subjects that we will discuss during the consultation will be (a) relocating the trail, (b) the impacts of the trail users on the clapper rail and other sensitive species in the San

⁸ This does not include FRCC's entire mitigation obligation north of the San Dieguito River. The riparian vegetation was to have extended farther upstream by at least double the 1700-foot reach, and was to have reached a maximum width of approximately 500 feet.

⁹ The minutes from the April 4, 2006, meeting correctly reflect that the Wildlife Agencies indicated that neither agency has the authority to require the City to select a particular mitigation site if several are adequate. The minutes go on to state, "If it can be demonstrated that emergent marsh can be established on the JPA site, then that site is acceptable for mitigation for El Camino Real Road/Bridge Project." We do not agree with this because the mitigation for the establishment alone of the marsh will not necessarily mitigate for the loss of clapper rail habitat; there are other factors involved. Also of note from the minutes is the following statement, "The Coastal Commission said that if there is biological benefit to mitigating outside of the Coastal Zone, they would consider such a plan." The Coastal Zone extends to El Camino Real (*i.e.*, it does not include the potential mitigation area to the east of El Camino Real).

Dieguito River, (c) the effects (e.g., erosional runoff) of the paved trail on the downslope substrate and habitat, (d) the management of the horse manure, (e) cowbirds, and (f) measures to adequately mitigate for these impacts.

Another alternative to consider as part of the mitigation to enhance the existing clapper rail 17. habitat would be to provide a transition of wetland (e.g., southern willow scrub, mule fat scrub) to upland habitat along the southern bank of the River east of El Camino Real. The City's preferred alternative at the time of the April 10, 2002, meeting proposed to widen the river by excavating approximately 8.7 acres of upland along its southern bank. The project then proposed to widen the river by up to 100 feet for a distance of 800 feet upstream of (i.e., east of) El Camino Real and up to 300 feet for 1,000 feet downstream of the road. Project construction is proposed to occur in phases. It was subsequently determined that this extensive widening was not necessary to achieve no net rise in the 100-year water surface elevation, and the Wildlife Agencies expressed concern about the scale of the widening and its potential impacts on the extant habitat. The point is that if it was previously feasible to use some of the property along the southern bank of the San Dieguito River for this project, it must still be feasible to do so. A widening of 100 by 800 feet would occupy approximately 1.84 acres. We would like to discuss the possibility of incorporating this area into the mitigation by laying back (not widening the bed of the River) the slope and planting it with appropriate vegetation. This would provide an extension to the clapper rail habitat and an area for their use as a refugium and/or foraging.

Nature of the Proposed Wetland Mitigation

- 18. The DEIR states (and the City has explained to us before), "no sites for potential enhancement of coastal wetland habitat were found in the immediate project vicinity." Therefore, the City proposes to provide a considerable excess of creation of wetland habitat than will likely be required to compensate for the project-related losses. Because of our concerns about the proposed wetland creation, we requested that the City further investigate the enhancement opportunities within the San Dieguito River that the City may not have considered. We did not find evidence in the DEIR that the City had done so. We request again that the City consider opportunities for long-term / in-perpetuity invasive plant removal upstream of the existing bridge between the bridge and Morgan Run golf course, or beyond (at the first occurrence of invasive plants). We believe that both FRCC and MRGC are obligated to remove invasive plants, but we do not know the duration or aerial extent of their obligations. We request that the City investigate the terms of these obligations. If they do not include all the areas within the entire reach of the San Dieguito River between the bridge and the MRGC infested with invasive species and/or if the obligations are short-term, then long-term exotic species removal in those areas could partially or wholly replace excess creation proposed for the enhancement component of the mitigation, and could prove more ecologically beneficial (for wetland functions, including clapper rail needs) than the proposed creation of habitat.
- Included in the Planting Plan for Riparian Scrub habitat are sensitive species such as San Diego marsh elder (*Iva hayesiana*) container stock and Palmer's sagewort (*Artemesia palmeri*) seed. These species are already present naturally. Therefore, to sustain the

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FWS-SDG-3236.4, SCH#1999071104

Enclosure page 14 of 15

genetic stock of these sensitive plant species, cuttings and seeds should be collected from those individuals on site and grown out at a nursery for later reintroduction during restoration activities. The locations of each species should also be documented and provided in a figure in the final EIR. Impacts to the naturally occurring specimens should be avoided and/or minimized.

20. The proposed wetland mitigation is intended to provide species specific mitigation by, for example, applying a mitigation ratio of 4:1 to the habitat occupied by the clapper rail and meeting the 4:1 ratio with creation only. The success criteria for this mitigation are based solely on the condition of the vegetation to be planted. Success criteria specific to the use of the mitigation area by the clapper rail should also be included. Absent exceptional circumstances (e.g., clapper rail do not persist in the project area for reasons unrelated to the project), there must be evidence that the clapper rail uses the created habitat before it can be considered a success.

Water Quality and Noise

21. The DEIR explains that the created drainage ditches along El Camino Real and Via del la Valle would serve as best management practices (BMPs) by filtering contaminants out of the runoff from the roads. Proposed improvements to the drainage ditch would result in a trapezoidal channel 22 feet wide and 6 feet deep with the ability to handle 616 cfs (Q_{100}) from a 631-acre watershed. The alternative to this mentioned in the DEIR is an underground storm drain. Please explain how a channel of this capacity or an underground storm drain would provide water quality remediation. It is imperative that road improvements such as this one also include improvements to water quality to address concerns for the release of contaminants such as polyaromatic hydrocarbons, fecal coliform, pesticides, etc. which are regularly discharged into surface waters. We recommend that a treatment facility (e.g., retention basin, vault system or an appropriately designed vegetated swale) be incorporated into the project to provide the necessary mitigation to offset the deleterious effects of storm water pollution on the sensitive species and habitats found in the river corridor. For example, research indicates that low fertility and egg-hatching success in northern populations of clapper rail may result from contaminants (Eddleman et al., 1998).

We also request information on the BMPs that will be incorporated into the project design to accept flows from the bridge prior to their entry into San Dieguito River.

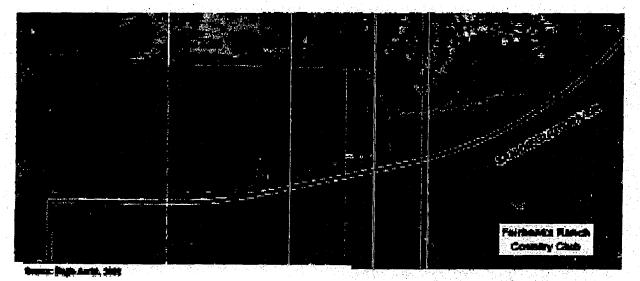
22. If the EAA is built, the sound of traffic will travel farther into the clapper rail habitat than it does now. We request that the City investigate and incorporate into the bridge and road design measures to dissipate the noise from traffic. For example, porous Elastic Road Surfaces (*i.e.*, asphalt-rubber) and/or noise dampening barriers could provide a reduction in noise pollution below harmful and disruptive levels.

Enclosure page 15 of 15

Literature Cited

- Eddleman, W.R., and C.J. Conway. 1998. Clapper Rail (*Rallus longirostris*). In The Birds of North America, No. 340 (A. Poole and F. Gill, eds.). The Birds of North America, Inc. Philadelphia. PA.
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- Zembal, R., B.W. Massey, and J.M. Fancher. 1989. Movements and activity patterns of the light-footed clapper rail. J. Wildl. Manage. 53:39-42 pp.
- Zembal, R., Hoffman, S., and Konecny, J. 2006. Status and Distribution of The Light-footed Clapper Rail in California, 2006. Report To California Department of Fish and Game and U.S. Fish and Wildlife Service on Behalf of Clapper Rail Recovery Fund, June 2006.

The figure below is associated with comment #15.





20 455 Ú 200 Peru Contractor a 200 fact This image is excerpted from the DEIR for a project of the Olivenhain Municipal Water District (San Dieguito Water Storage and Project, Figure 2-1). Ignore the double yellow line.

approximate mitigation area.

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DFG R5 Southcoast Region

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STATE OF CALIFORNIA THE RESOURCES AGENCY

ARNOLD SCHWARZENEGGER. Governor



FACSIMILE TRANSMITTAL

TO: Donna Clark, Environmental Planner City of San Diego Development Services Center Telephone (619) 446-5387 Fax (619) 446-5499

> State Clearinghouse Fax (916) 323-3018

- FROM: Libby Lucas South Coast Region 4949 Viewridge Avenue San Diego, California 92123 Telephone (858) 467-4230 Fax (858) 627-3984
- DATE: 10/23/06

TIME: 1735

OF PAGES SENT INCLUDING TRANSMITTAL SHEET 20

COMMENTS:

This is the joint comment letter from the Department of Fish and Game and the U.S. Fish and Wildlife Service on the Draft Environmental Impact Report for the El Camino Real Road Widening/ Bridge Replacement Project (SCH# 1999071104). We will also send the City the letter by regular mail, and copies to the cc's by regular mail.

IF YOU DO NOT RECEIVE ALL OF THE PAGES INDICATED PLEASE CALL THE SENDER AS SOON AS POSSIBLE.



Arnold Schwarzenegger Governor STATE OF CALIFORNIA Governor's Office of Planning and Research State Clearinghouse and Planning Unit



Sean Walsh Director

October 24, 2006

Donna Clark City of San Diego 1222 First Avenue, MS 501 San Diego, CA 92101

Subject: El Camino Real Road/Bridge Widening SCH#: 1999071104

Dear Donna Clark:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on October 21, 2006, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Serving Roberts

Terry Roberts \checkmark Director, State Clearinghouse

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1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044 TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Report State Clearinghouse Data Base

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For 619-446-3449

STATE OF CALIFORNIA

Arnold Schwarzenegger, Governor

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364 SACRAMENTO, CA 95814 (916) 653-4082 Fax (916) 657-5390 Web Site www.nahc.ca.gov

September 18, 2006

Ms. Donna Clark **City of San Diego** 1222 First Avenue, MS 501 San Diego, CA 92101 RECEIVED OCT 0 4 2006 STATE CLEARING HOUSE

Re: <u>SCH#1999071104</u>; <u>CEQA Notice of Completion</u>; <u>Development Permit for Road widening</u>, <u>El Comino Real and</u> <u>Ridge Replacement</u>; <u>San Diego County</u>, <u>California</u>

Dear Ms. Clark:

Thank you for the opportunity to comment on the above-referenced document. The California Environmental Quality Act (CEQA) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR per CEQA guidelines § 15064.5(b)(c). In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the area of project effect (APE), and if so, to mitigate that effect. To adequately assess the projectrelated impacts on historical resources, the Commission recommends the following action: √ Contact the appropriate California Historic Resources Information Center (CHRIS). The record search will

determine:

- If a part or the entire APE) has been previously surveyed for cultural resources.
- If any known cultural resources have already been recorded in or adjacent to the APE.
- If the probability is low, moderate, or high that cultural resources are located in the APE.
- If a survey is required to determine whether previously unrecorded cultural resources are present.

 $\sqrt{1}$ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.

The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for pubic disclosure.

The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.

√ Contact the Native American Heritage Commission (NAHC) for:

- * A Sacred Lands File (SLF) search of the project area and information on tribal contacts in the project vicinity who may have additional cultural resource information. Please provide this office with the following citation format to assist with the Sacred Lands File search request: <u>USGS 7.5-minute quadrangle citation</u> with name, township, range and section:
- The NAHC advises the use of Native American Monitors to ensure proper identification and care given cultural resources that may be discovered. The NAHC recommends that contact be made with Native American Contacts on the attached list to get their input on potential project impact, particularly the contacts of the on the list.

 $\sqrt{1}$ Lack of surface evidence of archeological resources does not preclude their subsurface existence.

- Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5 (f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
- Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.

 $\sqrt{}$ Lead agencies should include provisions for discovery of Native American human remains or unmarked cemeteries in their mitigation plans.

* CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens.

 $\sqrt{}$ Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the CEQA Guidelines mandate procedures to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

<u>V</u> Lead agencies should consider avoidance, as defined in § 15370 of the CEQA Guidelines, when significant cultural resources are discovered during the course of project planning.

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely, Dave Singleton Program Analyst

Cc: State Clearinghouse Attachment: List of Native American Contacts

Appendix F

Review of Section 3.8 of EIR for El Camino Real Road and Bridge Widening Project, San Diego, California, Ninyo & Moore, December 6, 2012



December 6, 2012 Project No. 107179004

Mr. Dean Marsden City of San Diego Engineering and Capital Projects Department c/o Ms. Lisa Lind Recon Environmental 1927 5th Avenue San Diego, California 92101

Subject: Review of Section 3.8 of EIR for El Camino Real Bridge and Road Widening Project San Diego, California

Dear Mr. Marsden:

In accordance with your request, we are providing this letter in support of the City of San Diego – El Camino Real Bridge/Road Widening Environmental Impact (EIR) document in support of the California Environmental Quality Act (CEQA) requirements. The El Camino Real Bridge/Road Widening project involves the widening of El Camino Real including the existing bridge over the San Dieguito River to a four-lane major road.

Based on the results of our Geotechnical Update (Ninyo & Moore, 2012), we recommend the following updates to the EIR document:

- Within the Local Geologic Setting subsection of Section 3.8.2.2, the most recent geologic map should be referenced (Kennedy and Tan, 2008). Furthermore, the term "Baypoint Formation" should be updated to "Old Paralic Deposits", as described by Kennedy and Tan (2008).
- Within the Local Tectonic Settings/Seismicity subsection of Section 3.8.2.2, the maximum moment magnitude for the Rose Canyon fault, the closest fault to the study area, should be updated to 7.2.
- Table 3.8-2 should be updated to present the updated distances to principal active faults and the maximum moment magnitudes of those faults. The updated fault distances and magnitudes are given in Table 1 below.

5710 Ruffin Road • San Diego, California 92123 • Phone (858) 576-1000 • Fax (858) 576-9600

Fault	Distance miles (kilometers) ^{1,2}	Moment Magnitude ²
Rose Canyon	4.4 (7.1)	7.2
Newport-Inglewood (Offshore)	17 (21)	7.1
Coronado Bank	18 (29)	7.6
Elsinore (Julian Segment)	30 (48)	7.1
Elsinore (Temecula Segment)	30 (49)	6.8
Notes: ¹ Blake (2001); ² Cao, et al. (2003)		

Table 1 – Principal Active Faults

- Within the Local Setting/Seismicity subsection of Section 3.8.2.2, discussion and quantification of ground acceleration is no longer applicable based on current building codes and industry practice. Discussion of ground acceleration may be removed from the CEQA document.
- In discussion of Table 3.8-3, it should be noted that earthquake magnitude as measured by earthquake moment differs from the Richter scale, particularly for earthquakes with moment magnitudes greater than 5.0.

We appreciate the opportunity to be of service on this project.

Sincerely, NINYO & MOORE

Ronald D. Hallum, PG, CEG Senior Geologist

NMM/RDH/GTF/gg

Attachment: References

Distribution: (1) Addressee



1/1/

Gregory T. Farrand, PG, CEG Principal Geologist

REFERENCES

- Blake, T.F., 2001, FRISKSP (Version 4.00) A Computer Program for the Probabilistic Estimation of Peak Acceleration and Uniform Hazard Spectra Using 3-D Faults as Earthquake Sources.
- Cao, T., Bryant, W. A., Rowshandel, B., Branum, D., and Willis, C. J., 2003, The Revised 2002 California Probabilistic Seismic Hazards Maps: California Geological Survey: dated June City of San Diego, 2008, Seismic Safety Study, Geologic Hazards and Faults.
- City of San Diego, 2008, Seismic Safety Study, Geologic Hazards and Faults, Grid 42, Scale 1:9,600.
- Kennedy, M.P., and Tan, S.S., 2008, Geologic Map of the San Diego 30'x 60' Quadrangle, California; California Geological Survey, Regional Geologic Map Series.
- Ninyo & Moore, 2012, Geotechnical Update, El Camino Real Bridge and Roadway Widening Project, San Diego, California: dated December 4.

Appendices

- A: Notice of Preparation
- B: 404 (b)(1) Guidelines Information
- C: Agency Correspondence
- D: Bridge Construction Methodology & Associated Noise Reduction Measures, and Biological & Hydraulic Impacts
- E: Letters of Comment on 2006 Draft EIR
- F: Review of Section 3.8 of EIR for El Camino Real Road and Bridge Widening Project, San Diego, California, Ninyo & Moore, December 6, 2012

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Appendix A

Notice of Preparation



Gray Davis Governor

STATE OF CALIFORNIA Governor's Office of Planning and Research State Clearinghouse



Notice of Preparation

November 6, 2002

To: Reviewing Agencies

Re: El Camino Real Road/Bridge Widening SCH# 1999071104

Attached for your review and comment is the Notice of Preparation (NOP) for the El Camino Real Road/Bridge Widening draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Donna Clark City of San Diego 1222 First Ave. MS 501 San Diego, CA 92101

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Hecley Frank

Becky Frank Project Analyst, State Clearinghouse

Attachments cc: Lead Agency



Document Details Report State Clearinghouse Data Base

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SCH# Project Title Lead Agency	1999071104 El Camino Real Road/Bndge Widening San Diego, City of			
Турө	NOP Notice of Preparation			
Description	Widen a 0.5 mile section of El Camino Real between Via de la Valle and San Dieguito Road to a four-lane major road with curbs, gutters, pedestrian walkways, bike lanes, equestrian/pedestrian crossings, and landscpaed medians. The existing bridge would be replaced with a new structure and a portion of the river channel would be deepened and widened. The western portion of the site is within the Subarea II of the Future Urbanizing Area, and the eastern portion is in the Fairbanks Ranch Country Club Community Planning Area.			
Lead Agend	cy Contact			
Name	Donna Clark			
Agency	City of San Diego			
Phone	619-446-5387 Fax			
emall				
Address	1222 First Ave.			
	MS 501			
City	San Diego State CA Zlp 92101			
Project Loca	ation			
County	San Diego			
City	San Diego			
Region	·			
Cross Streets	Via De La Vaile & San Dieguito Road			
Parcel No.				
Township	14S Range 3W Section 6,7 Bese SBBM			
Proximity to):			
Highways	I-5			
Airports				
Ral/weys	x			
Waterways	San Dieguito River			
Schools				
Land Use	Existing two-lane road with and existing bridge.			
Project Issues	Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Geologic/Selsmic; Noise; Traffic/Circulation; Vegetation; Water Quality; Wetland/Riparian; Wildlife; Other Issues			
Reviewing Agencies	Resources Agency; Department of Boating and Waterways; Department of Conservation; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Game, Region 5; Native American Heritage Commission; State Lands Commission; Caltrans, District 11; Air Resources Board, Transportation Projects; Regional Water Quality Control Board, Region 9			
Date Received	11/06/2002 Start of Review 11/06/2002 End of Review 12/05/2002			

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Resources Agency	Fish and Game	Colorado River Board Gerald R. Zimmerman	Dept. of Transportation 10 Torn Dumas District 10	State Water Resources Con. Board Greg Frantz
Resources Agency Nadell Gayou Dept. of Boating & Waterways Bill Curry California Coastal Commission Elizabeth A. Fuchs Dept. of Conservation Roseanne Taylor Dept. of Forestry & Fire Protection Allen Robertson Office of Historic Preservation Hans Kreutzberg Dept of Parks & Recreation B. Noah Tilghman Environmental Stewardship Section Reclamation Board Pam Bruner S.F. Bay Conservation &	 Fish and Game Dept. of Fish & Game Scott Flint Environmental Services Division Dept. of Fish & Game 1 Donald Koch Region 1 Dept. of Fish & Game 2 Banky Curtis Region 2 Dept. of Fish & Game 3 Robert Floerke Region 3 Dept. of Fish & Game 4 William Laudermilk Region 4 Dept. of Fish & Game 5 Don Chadwick Region 5, Habitat Conservation Program Dept. of Fish & Game 6 Gabrina Gatchel Region 6, Habitat Conservation Program 	 Colorado River Board Gerald R. Zhmmerman Tahoe Regional Planning Agency (TRPA) Lyn Barnett Office of Emergency Services John Rowden, Manager Delta Protection Commission Debby Eddy Santa Monica Mountains Conservancy Paul Edelman Dept. of Transportation 1 Mike Eagan District 1 Dept. of Transportation 2 Don Anderson District 2 Dept. of Transportation 3 	Dept. of Transportation 10 Tom Dumas	Board
Dev't. Comm. Steve McAdam Dept. of Water Resources Resources Agency Nadell Gayou	 Dept, of Fish & Game 6 I/M Tammy Allen Region 6, Inyo/Mono, Habitat Conservation Program Dept. of Fish & Game M Tom Napoli Marine Region 	Jeff Pulverman District 3 Dept. of Transportation 4 Jean Finney District 4 Dept. of Transportation 5 David Murray	Air Resources Board Airport Projects Jim Lemer Transportation Projects Kurt Karperos	RWQCB 5S Central Valley Region (5) RWQCB 5F Central Valley Region (5) Fresno Branch Office RWQCB 5R Central Valley Region (5)
Health & Welfare Wayne Hubbard Dept. of Health/Drinking Water Food & Agriculture Food & Agriculture Steve Shaffer Dept. of Food and Agriculture	Independent Commissions California Energy Commission Environmental Office Native American Heritage Comm. Debble Treadway Public Utilities Commission Ken Lewis State Lands Commission Betty Silva Governor's Office of Planning & Research State Clearinghouse Planner	 District 5 Dept. of Transportation 6 Marc Birnbaum District 6 Dept. of Transportation 7 Stephen J. Buswell District 7 Dept. of Transportation 8 Linda Grimes, District 8 Dept. of Transportation 9 Katy Walton District 9 	 Industrial Projects Mike Tollstrup California Integrated Waste Management Board Sue O'Leary State Water Resources Control Board Diane Edwards Division of Clean Water Programs 	Redding Branch Office RWQCB 6 Lahontan Region (6) Lahontan Region (6) Victorville Branch Office RWQCB 7 Colorado River Basin Region (7) RWQCB 8 Santa Ana Region (8) RWQCB 9 San Diego Region (9)

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NDV - 7 2002

THE CITY OF SAN DIEGO

Date: November 6, 2002

City of San Diego Development Services Department LAND DEVELOPMENT REVIEW DIVISION 1222 First Avenue Mail Station 501 San Diego, CA 92101 (619) 446-5460

REVISED

NOTICE OF PREPARATION OF A DRAFT JOINT ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL ASSESSMENT

THE CITY OF SAN DIEGO will prepare a joint Environmental Impact Report/Environmental Assessment (EIR/EA) in compliance with the California Environmental Quality Act (CEQA), Section 102 (2)(c) of the National Environmental Policy Act (NEPA) of 1969, and Council of Environmental Quality Guidelines (40 CFR, Part 1500) for the following project:

PROJECT: EL CAMINO REAL ROAD WIDENING/BRIDGE REPLACEMENT: CITY COUNCIL APPROVAL/COASTAL DEVELOPMENT PERMIT/SITE DEVELOPMENT PERMIT/CAPITAL IMPROVEMENT PROJECT NO. 52-479.0 (PTS No. 2982) to widen a 0.5 mile section of El Camino Real between Via de la Valle and San Dieguito Road to a four-lane major road with curbs, gutters, pedestrian walkways, bike lanes, equestrian/pedestrian crossings, and landscaped medians. The existing bridge would be replaced with a new structure and a portion of the river channel would be deepened and widened. The western portion of the site is within Subarea II of the Future Urbanizing Area, and the eastern portion is in the Fairbanks Ranch Country Club Community Planning Area. Legal Description: Site extends north and south through the center of Sections 6 and 7, Township 14 South, Range 3 West, San Bernardino Base Meridian. Applicant: City of San Diego Engineering and Capital Projects Department in partnership with the California Department of Transportation.

LDR NO.: 42-0351

SCH No. Pending

Based on an Initial Study, it appears that the project may result in significant environmental impacts in the following areas: Land Use, Transportation, Hydrology/Water Quality, Biological Resources, Historical/Unique Archaeological Resources, Geology/Seismicity/Soils, Paleontological Resources, Visual Quality, Noise, Air Quality, and Agricultural Resources.

For more information, or to provide comments on the scope and content of the draft EIR, contact the following person at the address above: Donna Clark, Associate Planner, (619) 446-5387.

Written comments on the scope and content of the draft EIR/EA must be sent to the above address by no later than 30 days after receipt of this notice.



Responsible agencies are requested to indicate their statutory responsibilities in connection with this project when responding.

Attachments: Scoping Letter

Distribution:

U.S. Government U. S. Department of Transportation (2) U. S. Army Corps of Engineers (16, 26) Environmental Protection Agency (19) U. S. Department of the Interior, Fish and Wildlife Service (23) U.S. Department of Agriculture (25) State of California Caltrans, District 11 (31) California Department of Fish and Game (32) California Department of Food and Agriculture (34) California Department of Parks and Recreation (40, 474) Office of Historic Preservation (41) Resources Agency (43) Regional Water Quality Control Board (44) State Clearinghouse (46) California Coastal Commission (47, 48) Native American Heritage Commission (56) 22nd District Agricultural Association (349, 411) County of San Diego San Diego County Agricultural Department (64) San Diego County Department of Planning and Land Use (68, 420) San Diego County Department of Public Works (70, 72) City of San Diego Councilmember Peters, District 1 Tom Story, Senior Policy Advisor, Mayor's Office (91) **Development Services Department** Library Department - Government Documents (81) Real Estate Assets Department (85) Historical Resources Board (87) Wetland Advisory Board (91A, 171) General Services (92) Gary Hess (352) Others City of Del Mar (96, 358,413) City of Solana Beach (105, 414) San Diego Transit Corporation (112) San Diego Gas and Electric Company (114) Metropolitan Transit Development Board (115) San Dieguito River Park Joint Powers Authority (116) Rancho Santa Ana Botanic Garden at Claremont (161) Environmental Law Society (164) Sierra Club (165, 165A) San Diego Earth Times (165B) San Diego Natural History Museum (166) San Diego Audubon Society (167) California Native Plant Society (170) Stuart Hurlbert (172) San Diego Regulatory Alert (174) The Center for Biological Diversity (176)

Citizens Coordinate for Century III (179) Endangered Habitats League (182) Dr. Florence Shipek (208) Dr. Lynne E. Christenson (208A) South Coastal Information Center (210) San Diego Historical Society (211) San Diego Archaeological Center (212) San Diego Natural History Museum (213) Save Our Heritage Organisation (214) Ron Christman (215) Louie Guassac (215A) San Diego County Archaeological Society, Inc. (218) National Trust for Historic Preservation (219) Native American Heritage Commission (222) Kumeyaay Cultural Repatriation Committee (225) Southern Diegueno Bands (225A through 225I) Northern Diegueno Bands (225J through 225L) Luiseno/Cupeno Bands (225M through 225Q) Cahuilla Band (225R) Carmel Valley Community Service Center (344A) Pardee Construction Company (345, 355) City Attorney of Del Mar (346) Brian Biamonte (348) Carmel Valley Community Planning Board (350) Carmel Mountain Conservancy (184,408, 476) San Dieguito Lagoon Committee (409) San Dieguito Planning Group (412) San Dieguito River Park CAC (415) Friends of San Dieguito River Valley (419, 421) San Dieguito River Valley and Conservancy (422) RVR PARC (423) Fairbanks Ranch Association (424) San Dieguito River Park JPA (425A) Torrey Pines Community Planning Group (469) Polo Plaza M. L. Mosley, Mary's Tack Shop San Diego Polo Club at Rancho Santa Fe Seltzer, Caplan, Wilkins, and McMahon Coastal Environments Southern California Edison Hu Family Trust/Angelica Insurance Co., Ltd. R.M. and E.A. Gain Plaza Partners All Creatures Investment Partners R.H. and A.T. Speck Boudreau Trust of 1990 Donald T. and Mary L. Meagher Jacqueline Winterer Anne Harvey Marvin Gerst Vicki Touchstone Jan Fuchs Richard Manning Stephenson, Worley, Garratt, Schwartz, and Prairie

George Saddic Lucy Ann Albert Professor T. C. Hu, UCSD Mitch Berner

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THE CITY OF SAN DIEGO

Updated and Reissued November 6, 2002

Mark M. Weis City of San Diego Transportation and Drainage Design Engineering and Capital Projects 1010 Second Avenue, Suite 1100, MS 611 San Diego, CA 92101

SUBJECT: SCOPE OF WORK FOR DRAFT ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL ASSESSMENT (EIR/EA) FOR THE EL CAMINO REAL ROAD WIDENING/BRIDGE REPLACEMENT PROJECT (LDR NO. 42-0351, PTS NO. 2982, SCH No. Pending).

Dear Mr. Weis:

Update: The Environmental Analysis Section (EAS) of the Land Development Review Division has conducted an Initial Study for the proposed widening of a portion of El Camino Real and the replacement of the bridge over the San Dieguito River. A letter outlining the scope of work for the draft Environmental Impact Report/Environmental Assessment was prepared and distributed on July 22, 1999. Subsequently, due to the adoption of the City of San Diego Land Development Code, the required discretionary actions have changed from a Resource Protection Ordinance (RPO) Permit to a Site Development Permit.

The project, which is proposed by the City of San Diego Engineering and Capital Projects' Transportation and Drainage Design Division, includes widening El Camino Real between Via de la Valle and San Dieguito Road, and replacing the existing bridge over the San Dieguito River with a new structure (See Figures 1 and 2). El Camino Real at this location is currently a twolane rural roadway without shoulders, divided median, or pedestrian walkways. The existing bridge, built in 1940, is approximately 340 feet long and 27 feet wide. The bridge piles are 30 feet long, and are set in sediments that could liquefy in a seismic event. The road at this location is subject to inundation by the 100-year flood. Although the bridge surface would not be inundated, the 100-year flood level would rise to the bottom of the bridge deck, so there is not adequate freeboard to allow debris to pass under the bridge.

The proposed project would widen the road to a four-lane major road, and add curbs, gutters, pedestrian walkways, bike lanes, equestrian/pedestrian crossings, and landscaped medians. The existing bridge would be replaced with a new structure. Construction is proposed to occur in phases, keeping the existing road and bridge open until the new eastern side is constructed, then diverting traffic to the new side while the road and bridge are replaced.



Development Services 1222 First Avenue, MS 501 • San Diego, CA 92101-4155 Tel (619) 446-5460 Page 2 Mark M. Weis November 6, 2002

Project goals and objectives include the following:

- Provide 100-year flood protection on road and bridge, and improve access during high flood events.
- Improve bridge to acceptable seismic safety standards.
- Improve traffic flow to acceptable levels.
- Improve public safety for drivers, bicyclists, pedestrians, and equestrians.
- Make the road and bridge consistent with approved policy documents for the area.
- Make the road and bridge consistent with regional recreational plans for the area.

Required discretionary actions include City of San Diego Approval of a Coastal Development Permit, Site Development Permit, and Capital Improvement Project No. 52-479.0; U.S. Army Corps of Engineers (ACOE) approval of an Individual 404 Permit; California Department of Fish and Game (CDGF) approval of a 1601 Streambed Alteration Agreement; Regional Water Quality Control Board (RWQCB) issuance of a 401 Water Quality Certification, California Coastal Commission (CCC) approval of a Coastal Development Permit and Coastal Consistency Determination, Federal Highways Administration (FHWA) approval of the programmatic Section 4(f) Evaluation, and, potentially, a Letter of Map Revision (LOMR) from the Federal Emergency Management Agency. FHWA approval of the project is also needed because federal Highway Bridge Replacement Rehabilitation (HBRR) funds are being requested for bridge construction.

Because of the federal involvement in the proposed project (i.e., a request for federal funds and the need for an ACOE Individual 404 permit), a joint Environmental Impact Report/Environmental Assessment (EIR/EA) will be prepared to satisfy the requirements of the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). The ACOE Individual 404 permit also triggers a requirement for implementation of the NEPA/404 Integration Process for Surface Transportation Projects in Arizona, California, and Nevada. The FHWA is the lead for the 404 Integration process, which will be facilitated by Caltrans.

The City of San Diego is the Lead Agency under CEQA in the preparation of the EIR/EA. The FHWA is the Lead Agency under NEPA, with Caltrans acting as FHWA's agent providing oversight. A minimum 45-day public review period will be provided for the draft EIR/EA.

The purpose of this letter is to identify the issues to be specifically addressed in the EIR/EA. Because there is a difference in the way the determination of "significance" is dealt with in CEQA versus NEPA, the EIR/EA should be prepared generally in accordance with the City's "Format for Environmental Impact Report Guidelines", except that any discussion of the significance of impacts should be provided in a separate chapter entitled "CEQA Significance". The issues to be addressed are discussed below. A Notice of Preparation will be distributed to Responsible Agencies and others who may have an interest in the project. Changes or additions to this scope of work may be required as a result of input received in response to the Notice of Preparation. Page 3 Mark M. Weis November 6, 2002

In conformance with the Integrated NEPA/404 Process, a letter must be prepared to develop preliminary agreement from the ACOE, EPA, U.S. Fish and Wildlife Service (USFWS), Caltrans, and FHWA on the overall project purpose and need, criteria for alternative selection, project alternatives to be evaluated in the environmental document, and level of agency involvement. The document's Purpose and Need statement must have written concurrence from the NEPA/404 signatories.

Please note that several of the reports required in the following pages must be prepared in conformance with FHWA, Caltrans, and City of San Diego guidelines. The methodologies specified by such guidelines may vary from agency to agency. If discrepancies arise from the directions provided in each agency's guidelines, please consult with EAS to ensure that the reports meet both CEQA and NEPA standards.

I. PROJECT DESCRIPTION

Discuss the need for, and goals of, the project. A clear, precise description of the project goals is an important tool in defining project alternatives. Describe all discretionary actions needed to implement the project, including all permits required from federal, state, and local agencies. Describe the major project features, including grading (cut and fill) and relocation of existing facilities. Describe any off-site activities necessary to construct the proposed project, including areas. Provide a background discussion on the Project Report and summarize the initial public outreach program.

II. ENVIRONMENTAL ISSUES

Land Use

Issue 1: How would the proposed project implement the goals, objectives, and recommendations of the City of San Diego Progress Guide and General Plan, the Framework Plan for the North City Future Urbanizing Area, and the City's adopted community plans and existing policies? Would the project be compatible with the surrounding existing and future planned land uses in the project vicinity?

Discuss how the project accomplishes or fails to implement the goals and objectives of the General Plan, the Future Urbanizing Area Framework Plan, the Fairbanks Ranch Country Club Specific Plan, and appropriate planning documents and policies for the San Dieguito River Valley. Include the issues of grading, erosion and siltation, and transportation. Assess the compatibility of the project with existing, planned, and proposed land uses in the surrounding communities. Identify conflicts with existing residences, businesses, or other land uses during project construction and operation. Identify any conflicts with established recreational, educational, religious, or scientific uses of the project area. Page 4 Mark M. Weis November 6, 2002

Issue 2: Would the project result in a conflict with the purpose and intent of any current planning process or adopted environmental plans or policies in the area?

The project location is within the boundaries of the focused planning area for the proposed San Dieguito River Valley Regional Open Space Park. Evaluate the project's consistency with the goals and objectives adopted for the planning area by the Joint Powers Authority (JPA). In addition, address the project's consistency with the adopted City of San Diego San Dieguito River Regional Park Plan.

Issue 3: Would the proposed project result in a conflict with the purpose and intent of the Environmentally Sensitive Lands (ESL) regulations of the Land Development Code (LDC)?

Upland and wetland biological resources, as well as, potentially important historic and prehistoric resources, which are protected by ESL, would be affected by project activities. Provide an analysis of the project's conformance with ESL. Any required approval of findings for alternative compliance should be fully addressed in this section. The analysis should address the preservation of designated or proposed open space areas and wildlife corridors. Discuss the project's conformance to City of San Diego design standards for features such as lane configuration, road design speed, sighting distance, and road grade. Note that the cumulative loss of wetlands is considered significant and unmitigated by the City of San Diego.

Issue 4: Would the proposed project affect recreational activities or plans for recreational areas on adjacent properties?

According to Title 23 (Highways) of the Code of Federal Regulation, the FHWA must not approve a project that "uses" land from a significant publicly owned public park, recreation area, or wildlife and waterfowl refuge, or any significant historic site unless a determination is made that there is not a feasible and prudent alternative to the use of the land, and the action includes all possible planning to minimize harm to the property resulting from such use.

There are several publicly owned recreational areas near the portion of El Camino Real proposed for widening. Show Park is owned by a State agency (22nd District Agricultural Association). The Polo Field is owned by the City of San Diego, as are the Open Space Preserve lands that extend south of the river to San Dieguito Road. In the future, multi-use recreational trails planned by the San Dieguito River Park JPA may cross on, under or near the bridge and road. Therefore, evaluation of potential impacts to these areas will be necessary. A Section 4(f) evaluation must be prepared if the lands are determined to be "used" by the project, through permanent incorporation into the transportation facility, temporary occupancy during construction, or indirect impacts. Early coordination with FHWA is required to identify any "use" of 4(f) resources and determine the appropriate level of evaluation and the level of review required (i.e., Department of the Interior or FHWA). The evaluation should also address the project's

Page 5 Mark M. Weis November 6, 2002

consistency with regional conservation efforts (see Issue 5 below). The 4(f) evaluation should be summarized in the text of the EIR/EA and included as an appendix.

The land use section of the EIR/EA should include an impact assessment and mitigation measures for recreational impacts. Identify where construction or operation of the project could disrupt existing or planned recreational uses for an extended period of time (i.e., for more than three months), and where the potential for enhancement of recreational opportunities exists (e.g., providing enhanced road crossing for equestrians at Show Park, and coordinating with the San Diequito River Park trails).

Issue 5: How is the project consistent with the region's Multiple Species . Conservation Program (MSCP) and the City of San Diego Subarea Plan?

Portions of the project alignment are within and/or adjacent to land identified in the City's MSCP Subarea Plan as Multiple Habitat Planning Area (MHPA). Is the project consistent with the specific guidelines for the Northern Area? Would any MSCP Subarea Plan-identified wildlife corridors be affected by project implementation? How would those portions of the alignment adjacent to the MHPA comply with the Northern Area Land Use Adjacency Guidelines in terms of land use, drainage, toxic substances, lighting, noise barriers, and invasive plant species? This section should identify any special conditions of coverage that may apply to the species affected by the project (a brief summary only is needed in the Land Use section). Refer the reader to the Biological Resources section of the EIR/EA for a detailed biological assessment. Describe the incorporation of applicable planning and land use adjacency guidelines into the project's mitigation proposal (e.g., lighting, signage, etc.). Summarize and refer to the Biological Resources section of the EIR/EA for a full discussion of mitigation measures for impacts to vegetation communities and covered species.

Traffic/Circulation

Issue 1: What direct and cumulative impacts would this project have on traffic circulation, traffic volume, and road capacity in the vicinity?

Future traffic (year 2015) on El Camino Real in the project area is projected to be 30,000 average daily trips. It is expected that this amount will increase through the horizon year 2020. Prepare a traffic study report in accordance with the EAS Significance Determination Guidelines and Transportation Development Section Traffic Guidelines for this roadway. This analysis should be included as an appendix and will form the basis of the traffic impact analysis section of the EIR/EA. The traffic consultant should coordinate with the City Transportation Development Section to determine the parameters of the traffic study and assessment of potential traffic impacts and benefits. This evaluation should consider impacts to existing roadways and intersections from: 1) additional, temporary construction traffic; 2) lane closures and road damage during construction; and 3) increased traffic from project operation. Evaluate existing, construction, and near-term traffic scenarios with the project implemented, and horizon Page 6 Mark M. Weis November 6, 2002

year (2020) conditions with the project. Analyze whether the response times of police, fire, or emergency medical services would be affected during construction.

Issue 2: What direct and cumulative impacts would the project have on the safety of pedestrians, bicyclists, and equestrians using facilities in the area crossed by the road during construction of the road and bridge, and during operation of the completed project?

Address the construction phasing and traffic control concepts for the project, and measures that would be taken to safely route pedestrians, bicyclists and equestrians while each side of the road and bridge are constructed. Analyze the project features that would be provided to enhance the safety of these users after the project is completed.

Hydrology/Water Quality

Issue 1: How would the proposed project affect the hydrology of the San Dieguito River? What features have been incorporated to protect the project components and surrounding land uses from inundation during a 100-year flood? What drainage facilities are proposed to control runoff?

The proposed project lies within the flood plain of the San Dieguito River. Provide a hydrology study which describes how the project would affect the velocity, water surface elevations, and flood patterns of the 100-year flood both upstream and downstream of the bridge. The study should be included in the appendices and summarized in the body of the EIR/EA. Discuss drainage from the wider road and bridge, and identify any additional facilities proposed to handle runoff. Include details such as location, ownership, and maintenance responsibilities for the recreated drainage channel parallel to El Camino Real. Discuss the requirement for an Executive Order 11988 Floodplain Finding and, if appropriate, the requirement to obtain an LOMR from FEMA.

Include a discussion of natural and beneficial floodplain values. Discuss the consistency of the project with the regulatory floodway. Evaluate and discuss practicable alternatives if it has been determined that there is a significant encroachment.

Issue 2: To what extent would the construction and ultimate development of the project affect the water quality of the San Dieguito River and Iagoon, as well as the ground water supply?

Discuss the creation of additional impervious surfaces along the wider road and bridge, and resulting urban runoff or concentration of urban pollutants from a wider road that would carry additional traffic. Discuss the potential for pollution from irrigation runoff with dissolved fertilizers and pesticides along the road landscaped parkway. Address the potential for construction-related and long-term erosion and/or siltation. Discuss Best Management Practices that would be incorporated into the construction plans to protect the river and lagoon from water quality impairment during construction of the road and bridge, especially during dredging operations. Address cumulative impacts, and note that Page 7 Mark M. Weis November 6, 2002

> cumulative downstream water quality impacts are considered significant and unmitigated by the City of San Diego.

Biological Resources

Issue 1: Would the proposed project result in impacts to important habitat or to sensitive upland and/or animal species?

Both upland and wetland biological resources would be affected by project implementation. Provide a detailed biological technical report, prepared by a qualified biologist in accordance with the City of San Diego's "Biology Guidelines" and Caltrans "Guidance for Consultants - Procedures for Completing the Natural Environmental Study and Related Biological Reports". The report should be included in the appendices and summarized in the environmental analysis section of the EIR/EA. The report should discuss the biological resources present on the site, including habitat type, predominant plant and animal species, known and expected sensitive, rare, proposed threatened or endangered species, and narrow endemic species as defined by the City of San Diego, CDFG, and the USFWS. Provide information for Caltrans to solicit the USFWS endangered, threatened, and proposed species list. Provide a wetland delineation and a waters determination for affected wetland and waters areas. Identify jurisdictional areas of the CDFG and the ACOE for affected wetland habitats. Discuss the requirement for an Executive Order 11990 Wetlands Finding.

Conduct a habitat evaluation for the Pacific pocket mouse, Belding's savannah sparrow, least Bell's vireo, and the Southwestern willow flycatcher. Conduct focused surveys, as appropriate, for federally listed endangered species. If field surveys confirm the presence of a listed species, informal consultation will be initiated with USFWS and the transportation engineer from FHWA, and will be facilitated by Caltrans. If formal consultation with the USFWS is required, a draft Biological Assessment will be submitted to Caltrans for review. Caltrans will submit the final Biological Assessment to FHWA, and FHWA will request formal consultation pursuant to Section 7 of the Endangered Species Act with the USFWS.

The report should contain a 200-foot scale vegetation map showing existing habitats and areas which support or could support sensitive species. The EIR/EA should describe the significance of the resources. Address the potential for indirect and cumulative impacts to any resources within, adjacent to, or downstream from the project area. Such impacts may include construction noise, lighting, and increased traffic noise.

The mitigation section should propose measures to avoid any identified impacts or reduce them to below a level of significance. Mitigation ratios for impacts to upland species and wetlands should be in accordance with those specified in the enclosed Biology Guidelines. Page 8 Mark M. Weis November 6, 2002

Issue 2: Would the proposed project interfere with the movement of any resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors?

The project proposes to excavate the southern river bank area to create a wider river upstream and downstream of the bridge. Identify and discuss potential impacts to MSCPdesignated wildlife corridors and the movement of fish and wildlife through this area and under the bridge.

Issue 3: Would the project affect the long-term conservation of biological resources?

Portions of the project area are within the City's Northern Area MHPA. The EIR/EA should address whether the project would affect the maintenance and enhancement of biological diversity in the region and the conservation of viable populations of endangered, threatened, and key sensitive species and their habitats. Discuss any potential lighting impacts that might occur to existing on-site or off-site habitat. Appropriate Land Use Adjacency Guidelines from the City of San Diego MSCP Subarea Plan should be included as mitigation measures.

Historical Resources

Issue 1: How would the proposed project affect historic and prehistoric resources in the Area of Potential Effect (APE)?

The coastal areas of San Diego County are known for intense and diverse prehistoric occupation and important archaeological resources. The county has been inhabited by various cultural groups spanning 10,000 years or more. Camp sites, villages, and artifacts have been recorded along the coast from Del Mar to Tijuana. Provide a Historic Property Survey Report and a historical resources technical report. All studies must be prepared by a qualified archaeologist, and must be consistent with the California Office of Historic Preservation's "Archaeological Resource Management Reports (ARMR): Recommended Contents and Format" and Caltrans "Guidance for Consultants - Procedures for the Protection of Historic Properties: The Section 106 Process" (1991). The report should include the results of the initial archaeological site survey and literature review already conducted for the proposed road widening area. Provide appropriate graphics, including a map of the APE. Complete additional field surveys, as appropriate, to address the potential direct, indirect, and cumulative impacts of all project components. Any newly discovered sites should be recorded at the San Diego Museum of Man and the South Coastal Information Center. For sites that are expected to be impacted by project implementation, a testing program should be conducted to determine site significance according to CEOA and ESL criteria. Evaluate sites for inclusion in the California Register of Historic Places. Because of the federal involvement in the project, sites must also be evaluated for eligibility for nomination to the National Register of Historic Places, per Section 106 of the National Historic Preservation Act. Include the report as an appendix. The records search results should be separately bound as a confidential

Page 9 Mark M. Weis November 6, 2002

appendix. The EIR/EA should summarize the results of the report and discuss the need for a research design and data recovery program to mitigate impacts on those sites that are determined to be significant. Discuss measures that will be implemented during construction to avoid, minimize, and mitigate impacts to important archaeological sites.

The bridge over the San Diego River was built over 45 years ago, and is therefore, potentially historically significant as defined by CEQA. Substantial modification or demolition of a significant historic structure would be considered a significant environmental impact under CEQA. Therefore, in addition to the above technical studies, provide a historic architectural survey report. The evaluation should be conducted by a qualified historian or architectural historian and should include the following components:

- consideration of the age, location, context, association with important persons or events, uniqueness and structural integrity of the bridge;
- the names of the architect, builder, and the year built, along with information regarding any significant contributions they made to the area;
- a brief analysis of the historical integrity of the immediate neighborhood and evaluation of any indirect impact the loss of the structure may have on the historical integrity of the surrounding neighborhood;
- consideration of the possibility of the site containing buried historical resources associated with the structure; and
- a one-mile record search for historical resources.

If it is determined that the bridge is not historically significant under CEQA and ESL, and not eligible for nomination to the National Register of Historic Places or the California Register of Historic Places, and that any indirect impact of the loss of the structure on the historical integrity of the surrounding neighborhood would be less than significant, the results of the evaluation may be submitted in a letter format along with a State of California Department of Parks and Recreation Primary Record Form (DPR 523A) and a Building, Structure, and Object Record Form (DPR 523B), complete with State Clearinghouse numbers.

If the bridge is determined to be historically significant, or if the loss of the structure would represent a significant impact on the historic fabric of the neighborhood, a complete historical report must be prepared in accordance with the above-referenced guidelines. The report should propose mitigation measures to reduce impacts to less than significant levels.

Please note that the above-referenced Section 106 process must be initiated before the draft environmental document may be released for public review. At a minimum, a Preliminary Finding of Effect must be made. The finding can be made only after the

Page 10 Mark M. Weis November 6, 2002

technical studies have been submitted to and reviewed by Caltrans, the State Historic Preservation Officer, and FHWA. This process may take approximately four months.

Issue 2: How would the proposed project affect resources with Native American values?

Conduct a Native American contact program to identify Traditional Cultural Properties and concerns in the area. Discuss the participation of Native Americans in monitoring of test excavations. Evaluate the potential significance of impacts to any resources with Native American values, and provide mitigation measures for a any significant impacts.

Geology/Seismicity/Soils

Issue 1: How would the proposed project affect or be affected by geologic, seismic, and soils conditions (including contamination)?

According to the City of San Diego's Seismic Safety Study (Map No. 42), the project site is assigned a geologic hazard rating of 32 (low potential for liquefaction; fluctuating groundwater; minor drainages). While this is not an adverse rating, one major component of the project is a seismic retrofit or replacement of the existing bridge structure. Provide a geologic reconnaissance in conformance with the City of San Diego's "Technical Guidelines for Geotechnical Reports". Include the report as an appendix and summarize the information in the body of the EIR/EA. Describe the geologic and subsurface conditions in the project area. Describe the general setting in terms of existing topography, geology, tectonics, and soil types. Document known seismic parameters for the project. Discuss the existing seismic hazards and unfavorable soil conditions, including ground shaking and liquefaction. Address potential erosion during construction and after implementation of the project, particularly for the widened river, new drainage channel, and road slopes.

Conduct an Initial Site Assessment which includes a Hazardous Materials Data Base Records Search for historical fills or incidents along effected areas of the road and river corridor. Utilize this information to evaluate the potential for soil contamination to affect the construction of any project components.

Paleontological Resources

Issue 1: How would the proposed project affect paleontological resources?

The northern- and southernmost portions of the project area are underlain by the Baypoint Formation. According to "Paleontological Resources, County of San Diego" (Thomas A. Demere and Stephen L. Walsh, Department of Paleontology, San Diego Natural History Museum, August 1994), this formation has produced large and diverse assemblages of well-preserved marine invertebrate fossils and rare vertebrate fossils, and is assigned a high resource sensitivity. Using the City of San Diego's "Paleontological Guidelines", Page 11 Mark M. Weis November 6, 2002

discuss the potential for project grading activities to impact fossil resources and identify mitigation measures for any significant impacts.

Visual Quality

Issue 1: How would the project affect the visual quality of the area, especially with regard to views from public roadways and public open space?

The project would alter the visual landscape along the road and the San Dieguito River. The new bridge would be higher and wider than the existing structure. Provide a graphic analysis in conformance with the FHWA's "Visual Assessment Guidelines." Include visual simulations of key visual impact points. Address the amount of contrast the project would have with the existing visual quality, view quality, landform quality, and community character. Include a discussion of visual impacts to users of the San Dieguito River Park. Describe compatibility of the lighting, landscaping, and other aesthetic themes that would be provided along the road and on the bridge with the existing rural character of the area. Describe measures to mitigate any potentially significant direct and/or cumulative visual impacts.

Noise

Issue 1: Would the surrounding uses experience noise levels that would exceed City of San Diego and Caltrans standards due to implementation of the project?

Future traffic in excess of 30,000 average daily trips and noise-generating land uses in the project area may expose sensitive receptors to noise levels in excess of allowable limits. Provide an acoustical analysis in conformance with the City of San Diego's "Acoustical Report Guidelines" and Caltrans "Noise Protocol". The noise analysis should be included in the appendices and summarized in the body of the EIR/EA. Include the following in the analysis: noise from construction of various project components (road, bridge, river widening, drainage channel), and noise from current and future (20 years) traffic and surrounding land uses. Describe the allowable noise level limits for construction activities and operation of the facilities. Identify surrounding uses that might be impacted in the short term and the long term, including any sensitive receptors. Where there is a potential for the project to exceed allowable limits, recommend measures to reduce the impact.

<u>Air Quality</u>

Issue 1: Would the proposed project affect the ability of the San Diego region to meet federal, state, and local air quality regulations?

Provide an air quality analysis that estimates project combustion emissions from construction equipment and construct vehicles, dust emissions from earthwork during construction, carbon monoxide emissions during construction (CO hot spots), and

Page 12 Mark M. Weis November 6, 2002

emissions from operation of the road and bridge. The analysis should be included as an appendix and summarized in the body of the EIR/EA. Prepare a discussion of Transportation Conformity of the project, as required by FHWA. Address cumulative air quality impacts.

Agricultural Resources

Issue 1: Would the proposed project result in the conversion of agricultural land to a nonagricultural use or impairment of the agricultural productivity of agricultural land?

Agricultural fields occur along portions of the project alignment. Therefore, evaluation of potential impacts to agricultural resources will be necessary. Describe existing farmlands and the consultation done to identify them. Farmland includes: 1) prime, 2) unique, 3) other than prime or unique that is of statewide importance, and 4) other than prime or unique that is of local importance. Where any of the four specified types of farmland could be directly or indirectly impacted by any alternative under consideration, summarize the results of early consultation with the Soil Conservation Service (SCS) and, as appropriate, State and local agriculture agencies. Where farmland would be impacted, include a map showing the location of all farmlands in the project impact area, discuss the impacts of the various alternatives and identify measures to avoid or reduce the impacts. Form AD 1006 (Farmland Conversion Impact Rating) should be processed, as appropriate, and a copy included as an appendix. Where the Land Evaluation and Site Assessment score (from Form AD 1006) is 160 points or greater, discuss alternatives to avoid farmland impacts. If avoidance is not possible, measures to minimize or reduce the impacts should be evaluated and, where appropriate, included in the analysis.

If other potentially significant issue areas arise during detailed environmental investigation of the project, consultation with this division is required to determine if these other areas need to be addressed in the EIR/EA. Should the project description be amended, an additional scope of work may be required. Furthermore, as the project design progresses and supplementary information becomes available, the EIR/EA may need to be expanded to include additional issue areas.

Mitigation measures should be clearly identified and discussed and their effectiveness assessed in each issue section of the EIR/EA. In addition, a monitoring and reporting program for each mitigation measure must be included. At a minimum, this program should identify: 1) the department responsible for the monitoring; 2) the monitoring and reporting schedule; and 3) the completion requirements. Mitigation measures and the monitoring and reporting program for each impact should also be contained (verbatim) in a separate, stand-alone document to be paper clipped to the back of the EIR/EA.

Page 13 Mark M. Weis November 6, 2002

A separate section of the EIR/EA should include a brief discussion of why certain areas were not considered to be potentially significant.

III. GROWTH INDUCEMENT

Evaluate the project potential to foster substantially increased economic or population growth, or the construction of additional housing in the surrounding area, either directly, indirectly, or cumulatively, based on the following questions:

- Are the road and bridge critical infrastructure in the chain of factors that support growth?
- What aspects of the project could remove obstacles to population growth?
- Would the project add an amenity that could accelerate growth in the vicinity?

IV. CUMULATIVE EFFECTS

Discuss the cumulative effects of the project in a separate section. The document should address the cumulative impacts of this project in combination with other planned and existing projects in the surrounding area. The discussion should address the potential cumulative effects related to land use, traffic/circulation, hydrology/water quality, biological resources, historical resources, visual quality/landform alteration, air quality, and agricultural resources.

V. MANDATORY DISCUSSION AREAS

In accordance with CEQA Guidelines Section 15126, the EIR/EA must include a discussion of the following issue areas:

- a. The relationship between local short-term uses of man's environment and the maintenance and enhancement of long term production.
- b. Any significant irreversible environmental changes which would be involved in the proposed action should it be implemented.

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VI. ALTERNATIVES

The EIR/EA should place major attention on reasonable alternatives which avoid or mitigate the project's significant impacts. These alternatives should be identified and discussed in detail, and should address all significant impacts. The alternatives analysis should be conducted in sufficient graphic and narrative detail to clearly assess the relative level of impacts and feasibility. Preceding the detailed alternatives analysis should be a section entitled "Alternatives Considered but Rejected." This section should include a discussion of preliminary alternatives that were considered but not analyzed in detail. The reason for rejection should be explained.

At a minimum, the following alternatives should be considered in the detailed alternative analysis.

A. <u>No Project</u>

The No Project alternative should address the effects of maintaining the current conditions of the road and the bridge. Discuss the impacts that would be avoided under this alternative. Discuss this alternative in relation to the project goals and objectives.

B. Reduced Project Alternative A

Discuss a reduced footprint for the project that could avoid impacts to the existing drainage channel parallel to El Camino Real. This alternative would, at a minimum, eliminate the parkway, pedestrian walkway, bicycle lanes, and landscaped median, but would still provide four traffic lanes. The bridge would be replaced and the road would be raised. Include a conceptual graphic reflecting the alternative. Identify and quantify the impacts that would be avoided/reduced under this alternative. Discuss this alternative in relation to the project goals and objectives.

C. <u>Reduced Project Alternative B</u>

Discuss a reduced footprint for the project that could avoid impacts to the existing drainage channel parallel to El Camino Real. This alternative would involve replacing the bridge and raising the road, but only providing two lanes as under the existing condition. Other amenities, such as bicycle lanes and a landscaped median would be included, although the parkway and pedestrian walkway would not. Include a conceptual graphic reflecting the alternative. Identify and quantify

Page 15 Mark M. Weis November 6, 2002

the impacts that would be avoided/reduced under this alternative. Discuss this alternative in relation to the project goals and objects.

D. Modified Project Location Alternative

Discuss a project with the road widened to four lanes to the west, which would avoid impacts to the existing drainage channel parallel to El Camino Real. This alternative would involve the full proposed widened footprint, but would require right-of-way from the 22nd District Agricultural Association and the private property landowners at the northern and southern ends of the project, at Via de la Valle and San Dieguito Road, respectively. Include a conceptual graphic reflecting the alternative. Describe the status of the existing bridge under this alternative. Identify and quantify the impacts that would be avoided/reduced under this alternative. Discuss this alternative in relation to the project goals and objectives.

If, during the environmental analysis process, other alternatives become apparent which would mitigate potential impacts, these should be discussed with EAS staff prior to including them in the EIR/EA. It is important to emphasize that the alternatives section of the EIR/EA should constitute a major part of the report. The timely processing of the environmental review will likely be dependent on the thoroughness of effort exhibited in the alternatives analysis.

The EIR/EA should be prepared in draft form by a consultant of your choice, based upon the scope of work determined by this office. It is important to note that timely processing of your project will be contingent in large part upon your selection of a well-qualified consultant. Prior to starting work on the EIR/EA, a meeting between the consultant and EAS will be required to discuss and clarify the scope of work.

Please contact Donna Clark of this office at (619) 446-5387 if you have any questions about the scope of the analysis presented in this letter or the environmental processing of the proposed project.

Sincerely,

Lawrence C. Monut

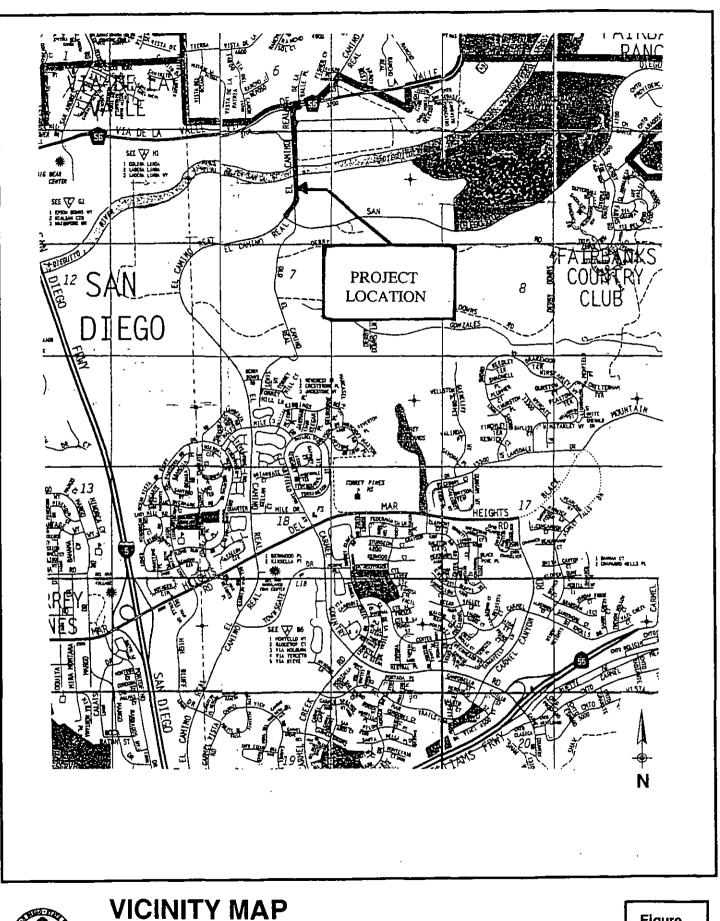
Lawrence C. Monserrate, Assistant Deputy Director Environmental Review Manager Development Services Department

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Attachments: Figure 1 (Vicinity Map) Figure 2 (Location Map)

cc:

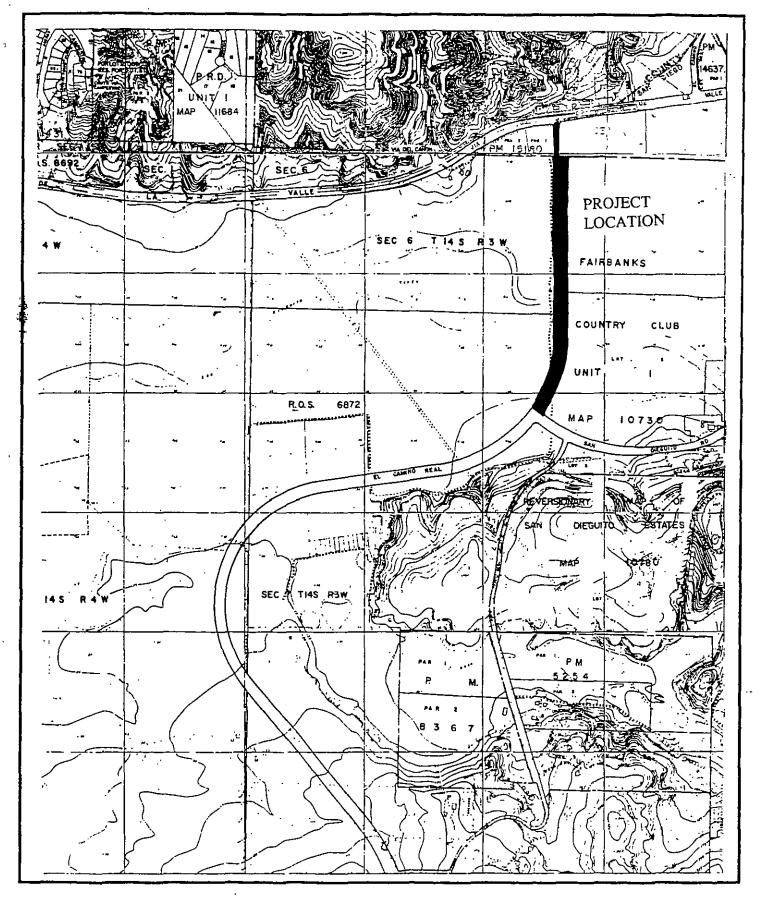
John Fisher, Development Project Manager Allison Raap, Senior Environmental Planner Kerry Santoro, Senior Planner David Nagy, Caltrans Tirzo Gonzalez, Earth Tech EAS Seniors Environmental File



EL CAMINO REAL ROAD WIDENING/BRIDGE REPLACEMENT

Figure 1

CITY OF SAN DIEGO • DEVELOPMENT SERVICES DEPARTMENT





LOCATION MAP

EL CAMINO REAL ROAD WIDENING/BRIDGE REPLACEMENT

Figure 2

CITY OF SAN DIEGO • DEVELOPMENT SERVICES DEPARTMENT

CITY OF SAN DIEGO M E M O R A N D U M

DATE:	December 4, 2002
TO:	Donna Clark, Associate Planner, Environmental Analysis Section
FROM:	Chris Gascon, Associate Civil Engineer, Water Review Section
SUBJECT:	El Camino Real Road Widening/Bridge Replacement - Notice of Preparation of a Draft Joint Environmental Impact Report/Environmental Assessment, LDR No. 42-0351

We have completed our review of the subject Notice of Preparation of a Draft Environmental Impact Report/Environmental Assessment dated November 6, 2002. The project proposes the widening of a .5 mile section of El Camino Real between Via de la Valle and San Dieguito Road to a four-lane major road with curbs, gutters, pedestrian walkways, bike lanes, pedestrian/equestrian crossings and landscaped medians. The existing bridge would be replaced with a new structure and a portion of the river channel would be deepened and widened. The western portion of the site is within Subarea II of the Future Urbanizing Area and the eastern portion is in the Fairbanks Ranch Country Club Community Planning Area.

The Water Review Section looks forward to reviewing the Draft Environmental Impact Report.

If you have any questions or require further information, please call me at 533-7417.

Chris Gascon, P.E.

cc: Shahin Moshref, Senior Civil Engineer, Development Services

02-164-21.016



JOINT POWERS AUTHORITY BOARD OF DIRECTORS

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Dick Bobertz Executive Director San Dieguito River Valley Regional Open Space Park 18372 Sycamore Creek Road Escondido, CA 92025 (858) 674-2270 Fax (858) 674-2280 www.sdrp.org

December 5, 2002

Donna Clark Development Services Dept. Land Development Review Division 1222 First Avenue, Fifth Floor Mail Station 501 San Diego, CA 92101

Subject: Notice of Preparation of Draft EIR/EA El Camino Real Road Widening/Bridge Replacement

Dear Ms. Clark:

Thank you for providing the San Dieguito River Park Joint Powers Authority (JPA) staff an opportunity to comment on the Notice of Preparation (NOP) for the above-listed project. River Park staff has met with City of San Diego staff on this project regarding its design and incorporation of the River Park's Coast to Crest trail alignment into the project design. The NOP adequately references the project site's location in the River Park's Focused Planning Area (FPA) and recognizes the potential impacts of the project on the River Park to be analyzed in the draft EIR/EA. In addition to the issues mentioned in the NOP, River Park staff also requests that the EIR/EA specifically evaluate the project's compatibility with the River Park's proposed wetland restoration project at the San Dieguito Lagoon. The subject segment of El Camino Real represents the eastern boundary of the \$50 million restoration project to be implemented jointly by Southern California Edison and the San Dieguito River Park JPA. A certified EIR/EIS is available for this project. Construction of this project is anticipated to begin in late 2003.

River Park staff appreciates City staff's recognition of the project's sensitive location and potential impacts. We look forward to reviewing the EIR/EA. In addition, this project will be reviewed by the River Park's Citizens Advisory Committee and JPA Board of Directors when the environmental documentation becomes available. Thank you for your consideration.

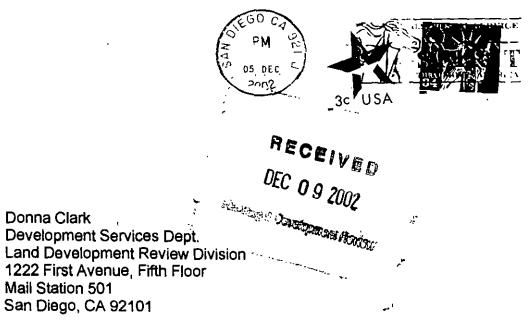
Sincerely.

Shawna C. Anderson, AICP Environmental Planner

Cc: Jan Fuchs, PRC Chair



San Dieguito River Park Joint Powers Authority 18372 Sycamore Creek Road Escondido, CA 92025



November 13, 2002



Ms. Donna Clark, Associate Planner City of San Diego Development Services Department Land Development Review Division 1222 First Avenue, MS 501 San Diego, California 92101

Subject: Response to the Revised Notice of Preparation of a Draft Joint Environmental Impact Report/Environmental Assessment for the El Camino Real Road Widening/Bridge Replacement project.

Dear Ms. Clark:

San Diego Gas and Electric Company (SDG&E) by its duly authorized agent and parent company, Sempra Energy Utilities, is responding to your Revised Notice of Preparation for the El Camino Real Road Widening/Bridge Replacement Joint EIR/EA. The following information is provided for your consideration:

- Please include specific environmental impact analyses related to any proposed utility relocation including any new facilities, such as poles needed to accommodate the relocations. The Draft EIR/EA should include a description of any SDG&E utility/facility that could be impacted by the proposed project and identify the utility on all diagrams. For example, several electric distribution poles and one electric transmission tower are located within the project site boundary. Project impacts to these poles or other SDG&E facilities should be fully analyzed in the Draft EIR/EA. Underground utility facilities are also located in the area of the project site.
- Please note that access to any transmission and distribution facilities must be provided during and after construction.
- Proposed access roads and grading must comply with SDG&E Guidelines for any encroachment to, and into any transmission rights-of-way. Furthermore, any grading to be performed within SDG&E right-of-way would require a "permission to grade letter" from SDG&E.

Ms. Donna Clark November 13, 2002 Page 2

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- Any changes in grade shall not direct drainage in a manner that increases the potential for erosion around SDG&E facilities or access roads.
- Project grades shall be coordinated to assure clearances as required by California Public Utilities Commission General Order 95.
- Any temporary or permanent relocation of facilities or placement of facilities underground and/or associated temporary outages shall be completed at the cost of the City of San Diego.

All project plans that affect or could affect SDG&E facilities and/or rights-of-way must be coordinated with Mike Williams of Sempra Energy Utilities, Land Management (858) 654-1201. We appreciate the opportunity to comment on this Revised NOP. If you have any questions, please feel free to contact me at (619) 696-4943.

Sincerely,

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Patrick O'Neill Land Planner Sempra Energy Utilities SDG&E



US Fish and Wildlife Service Carlsbad Fish and Wildlife Office 6010 Hidden Valley Road Carlsbad, California 92009 (760) 431-9440 FAX (760) 431-5902



California Department of Fish & Game South Coast Regional Office 4949 Viewridge Avenue San Diego, California 92123 (858) 467-4201 FAX (858) 467-4299

In Reply Refer to: FWS-SDG-3236.1

Donna Clark City of San Diego Development Services Department Land Development Review Division 1222 First Avenue, MS 501 San Diego, CA 92101

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DEC 12 2002

Re: Comments on the Notice of Preparation of a Draft Joint Environmental Impact Report/Environmental Assessment for the El Camino Real Road Widening/Bridge Replacement Project (SCH# 1999071104)

Dear Ms. Clark:

The California Department of Fish and Game (Department) and U. S. Fish and Wildlife Service (Service) (collectively, "Wildlife Agencies") have received, on November 12, 2002, and reviewed the above-referenced notice of preparation (NOP) of a draft environmental impact report environmental assessment (DEIR/EA) for the El Camino Real Road Widening/Bridge Replacement Project (Proposed Project), and the November 6, 2002, letter from the City of San Diego's (City) Development Service's Department regarding the scope of work for the DEIR/EA (City's letter). We also attended the City's April 10, 2002, pre-application meeting on the proposed project.

The comments provided herein are based on the information provided at the April 10 meeting and in the DEIR/EA, the Wildlife Agencies knowledge of sensitive and declining vegetation communities in San Diego County (County), and our participation in regional conservation planning efforts. To assist the City of San Diego in minimizing and mitigating project impacts to biological resources, and to assure that the project is consistent with ongoing regional habitat conservation planning efforts, we offer our recommendations and comments in Enclosure 1. In summary, we have the following major concerns about the proposed project as described in the NOP: (1) the potential effects to biological resources within the San Dieguito River; (2) potential impacts to the federally and state listed as endangered light-footed clapper rail (*Rallus longirostris levipes*); (3) potential impacts to wildlife corridors and movement; and (4) potential impacts to sensitive riparian species.

The primary concern and mandate of the Service is the protection of public fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Endangered Species Act of 1973, as amended

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Ms. Donna Clark (FWS-SDG-3236.1)

(Act) (16 U.S.C. 1531 et seq.). The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA) and is responsible for ensuring appropriate conservation of fish and wildlife resources including rare, threatened, and & endangered plant and animal species, pursuant to the California Endangered Species Act (CESA). The Department also administers the Natural Community Conservation Planning (NCCP) program.

The proposed project would widen a 0.5-mile section of El Camino Real between Via de la Valle and San Dieguito Road from a two-lane rural roadway, without shoulders, divided median, or pedestrian walkways, to a four lane major road with curbs, gutters, pedestrian walkways, bike lanes, equestrian/pedestrian crossings, and landscaped medians. The existing bridge would be replaced with a new structure and a portion of the San Dieguito River would be deepened and widened.

The City's preferred alternative at the time of the April 10, 2002, meeting proposed to widen the river by excavating approximately 8.7 acres of upland along its southern bank. The project would widen the river by up to 100 feet for a distance of 800 feet upstream of (i.e., east of) El Camino Real and up to 300 feet for 1,000 feet downstream of the road. Project construction is proposed to occur in phases.

The western portion of the site is within the Subarea II of the Future Urbanizing Area, and the eastern portion is in the Fairbanks Ranch Country Club Community Planning Area. Portions of the project are within the Multiple Habitat Preservation Area of the City's Multiple Species Conservation Program (MSCP) Subarea Plan. The project is upstream of San Dieguito Lagoon, and may affect the restoration efforts for the Lagoon under the San Dieguito River Park Joint Powers Authority (JPA) Restoration Plan (2000).

The Wildlife Agencies appreciate the opportunity to comment on this NOP. We are available to work with the City and their consultants to obtain any necessary permits for the proposed project. Please contact Libby Lucas of the Department at (858) 467-4230 or John DiGregoria of the Service at (760) 431-9440 if you have any questions or comments concerning this letter.

Susan E. Wynn Acting Assistant Field Supervisor U.S. Fish and Wildlife Service

Enclosure

Sincerely,

Chand

William E. Tippets Environmental Program Manager California Department of Fish and Game

cc: California Coastal Commission (Ellen Lirley) Department of Fish and Game (Tamara Spear) 2

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WILDLIFE AGENCY COMMENTS AND RECOMMENDATIONS ON NOTICE OF PREPARATION OF A DRAFT JOINT ENVIRONMENTAL IMPACT REPORT/ENVIRONMENTAL ASSESSMENT FOR THE EL CAMINO REAL ROAD WIDENING/BRIDGE REPLACEMENT PROJECT IN SAN DIEGO, CALIFORNIA

Major Concerns

- 1. The Wildlife Agencies have the following comments regarding potential project-related effects to the biological resources supported by the San Dieguito River.
 - a. We are concerned about the project-related potential direct and indirect hydrological impacts, particularly the long-term impacts on the riparian resources from widening and deepening the river. The DEIR/EA should provide a thorough analysis of the project's potential impacts on the riparian system supported by the San Dieguito River (including the river, the riparian habitat it supports, and the floodplain), and describe measures that would be taken to avoid indirect impacts on the morphology, habitat, and natural functions of the system. The DEIR/EA should also provide an analysis of the effects on the existing hydraulics of San Dieguito Lagoon, including scouring and deposition patterns. The preferred alternative should not adversely affect the design hydrology intended for the JPA Restoration Plan. The DEIR/EA should clarify the need and purpose of widening the river by as much as 100 feet, for a distance of 800 feet upstream of (i.e., east of) El Camino Real, and up to 300 feet, for a distance of 1,000 feet, downstream of the road.
 - b. The embankments that would be built to support the raised road would occupy floodplain that now accommodates flood flows. The DEIR/EA should provide a thorough discussion about the proposed reduction of the floodplain (including a quantification of the reduction in flood flow capacity), and the resulting need to widen San Dieguito River to accommodate 100-year flood flows and to avoid an increase in the size of the 100-year floodplain and potential flooding of Via de la Valle. The DEIR/EA should consider an alternative design with the proposed bridge spanning the entire 100-year floodplain using supports that do not occupy large areas of the floodplain (unlike the proposed embankments) within the project footprint, and other designs that would not adversely affect stream morphology and floodplain function and connectivity.
 - c. It is not clear from the documentation we reviewed whether any of the area used to widen San Dieguito River would be considered as mitigation for the impacts on wetlands. Any portion of that area requiring maintenance at any frequency, would not be acceptable to the Wildlife Agencies as mitigation.
 - d. In addition to describing the direct impacts on the riparian habitat, the DEIR/EA should include a discussion of: (a) the entire riparian area that would be partially or fully shaded by the project in the impact analysis; and (b) the existing riparian habitat, if any, that would require maintenance (at any frequency) to maintain the hydraulic capacity of

Enclosure 1 (FWS-SDG-3236.1)

the modified 100-year floodplain. The DEIR/EA should propose appropriate mitigation for these impacts. Off-site mitigation should be within the San Dieguito River watershed and enhance existing watershed level restoration efforts.

- 2. According to the Endangered Species Consultation Biological Assessment for the Interstate 5 Northbound Auxiliary Lane: Del Mar Heights Road to Via De La Valle (September 2002), the state and federally listed as endangered light-footed clapper rail (clapper rail) occurs within the proposed project's preferred alternative project footprint. Pursuant to Section 3511 of the California Fish and Game Code, the clapper rail is also designated as a State Fully Protected species. This designation prohibits take or possession of this species at any time (i.e., no take authorizations from the State are available). This also applies to any parts of the animal (e.g., in the case of birds, their eggs). The San Dieguito River should be surveyed for the presence of this species to determine whether clapper rails are utilizing the emergent wetlands around the existing El Camino Real bridge. The DEIR/EA should discuss the presence of the clapper rail within the project's area of potential effect.
- 3. We are concerned about the project-related potential impacts on wildlife corridors and movement within the project footprint and the vicinity. The DEIR/EA should comprehensively discuss this issue, including consideration of the cumulative impacts on wildlife movement from the proposed project and proposed modifications of the Boudreau property adjacent to and to the west of the project site (this discussion should be in the biology section of the DEIR/EA). The DEIR/EA's discussion regarding mitigation for impacts should include consideration of the installation of directional fencing long enough to prevent end runs, reconstruction of culverts that accommodate or could accommodate wildlife, construction of adequately sized new culverts where need is indicated for wildlife movement, installation of structures (e.g., berms, sound walls) to attenuate noise levels, and light (e.g., car and street lights) attenuation measures. If necessary to ascertain the potential impacts on wildlife movement and to assist in determining appropriate measures to eliminate or minimize these impacts, the City should conduct a wildlife movement study. The Wildlife Agencies request the opportunity to review the scope of work intended for any such study the City plans to conduct. If no such study is done, the DEIR/EA should demonstrate that the information used for the impact analysis is adequate.
- 4. The City's letter requires a habitat evaluation for the state listed as endangered Belding's savannah sparrow (*Passerculus sandwichensis beldingi*), the state and federally listed as endangered least Bell's vireo (*Vireo bellii pusillus*) and southwestern willow flycatcher (*Empidonax traillii extimus*), the federally listed as endangered and California Species of Special Concern (CSC) arroyo toad (*Bufo californicaus*), and the federally listed as endangered and CSC Pacific pocket mouse (*Perognathus longimembris pacificus*). The City's letter also requires focused surveys for federally listed endangered species. We recommend that the habitat evaluation also determine suitability of the habitat for and/or conduct surveys for all CSC (e.g., western spadefoot, *Scaphiopus hamondii*) and species designated as locally rare associated with the wetland habitats that would be affected, and all avian species that may nest within the project's area of potential effect. Project construction should be timed and conducted to avoid direct and indirect impacts (e.g., lighting) to all such species.

Additional Comments

- 1. The City has an approved Subarea Plan and Implementing Agreement under the Natural Community Conservation Planning program. The DEIR/EA for the proposed project must ensure and verify that all requirements and conditions of the Subarea Plan and Implementing Agreement are met. The DEIR/EA should also address biological issues that are not addressed in the Subarea Plan and Implementing Agreement, such as specific impacts to and mitigation requirements for wetlands or sensitive species and habitats that are not covered by the Subarea Plan and Implementing Agreement.
- 2. Issue areas in the DEIR/EA that may be influenced by the Subarea Plan and Implementing Agreement include "Land Use," "Landform Alteration/Visual Quality," "Traffic/Circulation," "Biological Resources," "Drainage/Urban Runoff/Water Quality," "Noise," and "Cumulative Effects." In addition, the DEIR/EA should describe why the proposed project, irrespective of other alternatives to the project, is consistent with and appropriate in the context of the Subarea Plan.
- 3. The Service is signatory to the NEPA/404 Integration Process for Transportation Projects in Arizona, California, and Nevada. As such, the Service should be a participant in the development of the purpose and needs statement, and project alternatives to ensure that the final project avoids and minimizes impacts to biological resources to the maximum extent possible. The NOP describes a series of alternatives, including a preferred alternative, when there has been no NEPA/404 Integration Process to develop these alternatives. The NOP is getting ahead of the process by presenting alternatives without signatory agency participation and concurrence.
- Pursuant to Section 143.0130(d) of the City's Environmentally Sensitive Lands (ESL) 4. Regulations, uses permitted in wetlands within the Coastal Overlay Zone are limited to aquaculture, nature study projects or similar resource-dependant uses, wetland restoration projects, and incidental public service projects. The project site is within the Coastal Overlay Zone and the proposed project would comport with none of the aforementioned categories. Section 143.0141(b) of the ESL Regulations states, "outside and inside the MHPA, impacts to wetlands,, shall be avoided." and, "Mitigation for impacts associated with a deviation¹ shall achieve the goal of no-net-loss and retain in-kind functions and values." In adopting a process for deviations from the ESL Regulations within the Coastal Overlay, the San Diego City Council contemplated situations in which the City would seek exemptions to the prohibition against affecting wetlands in the Coastal Overlay Zone. Section 143.0150(c) of the ESL Regulations states, "Within the Coastal Overlay Zone, deviations from the ESL Regulations may be granted only if the decision maker makes the findings in Section 126.0708." Therefore, the DEIR/EA should provide draft findings pursuant to Section 126.0708.

^{1 &}quot;Deviation" refers to the section of the City's Land Development Code, entitled "Deviations from Environmentally Sensitive Lands Regulations Within the Coastal Overlay Zone" (Section 143.0150[c])

Enclosure 1 (FWS-SDG-3236.1)

- 5. If avoidance of the avian breeding season is infeasible, pursuant to Sections 3503, 3503.5 and 3513 of the California Fish and Game Code², the DEIR should require that: (a) all vegetation clearing occur outside of the avian breeding season (i.e., should occur between September 1 and February 14, January 14 for raptors) in areas that would support avian nests; and (b) where there is suitable nesting habitat for any non-game birds within 300 feet of the project work area (within 500 feet for raptors), measures are implemented to avoid disturbing avian breeding behavior from indirect effects (e.g., noise, line-of-sight disturbances, night-lighting).
- 6. The DEIR/EA should clarify that a biological assessment is required for both informal and formal section 7 consultation under the Act if the project results in a "may effect" to federally listed species.
- 7. The Biological Resources section in the DEIR/EA should discuss the biological resources within the project's area of potential effect, not just within the project footprint.
- 8. The DEIR/EA should discuss the use of non-invasive, preferably native species, for all proposed landscaping (e.g., median, and shoulders).³ For native species, local seed (or plantings from local seed) should be used to the extent possible. We are concerned about the potential for invasive species to establish in areas of native vegetation, thereby reducing the biological viability of the habitat. We are also concerned about the use of any chemical pesticides or fertilizers that may pollute the San Dieguito River and negatively affect the aquatic species in the river and predators of those species. The use of native species in landscaping precludes or minimizes the need for such products.
- 9. The Hydrology/Water Quality section should address increased peak flows from increased impervious surface area associated with the road widening and provide mechanisms for attenuating these flows to preconstruction conditions. The DEIR/EA should quantify and propose mitigation for the habitat used to accommodate the associated best management practices.
- 10. As the City acknowledges, the proposed project will require a Streambed Alteration Agreement (SAA) from the Department. The Department's issuance of a SAA for a project

² Sections 3503, 3503.5 and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal Migratory Bird Treaty Act of 1918 [50 C.F.R. Section 10.13]; MBTA). See specific Sections of the Code for particulars. Migratory nongame native bird species are protected by international treaty under the MBTA.

³ Exotic plant species not to be used include those species listed on Lists A & B of the California Exotic Pest Plant Council's list of "Exotic Pest Plants of Greatest Ecological Concern in California as of October 1999." This list includes such species as: pepper trees, pampas grass, fountain grass, ice plant, myoporum, black locust, capeweed, tree of heaven, periwinkle, sweet alyssum, English ivy, French broom, Scotch broom, and Spanish broom. A copy of the complete list can be obtained by contacting the California Exotic Pest Plant Council at 32912 Calle del Tesoro, San Juan Capistrano, CA 92675-4427, or by accessing their web site at http://www.caleppc.org.

that is subject to the California Environmental Equality Act (CEQA) requires CEQA compliance actions by the Department as a Responsible Agency. As a Responsible Agency under CEQA, the Department may consider the City's CEQA documentation. To minimize additional requirements by the Department pursuant to Section 1600 *et seq.* and/or under CEQA, the documentation should fully identify the potential impacts to the river, riparian resources, and wetlands, and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the agreement.

- 11. The City's letter identifies the required discretionary actions necessary for the proposed project. In addition to the regulatory actions listed, we believe that the project would also be subject to the State Water Resources Control Board's General Construction Storm Water Permit.
- 12. The City's letter indicates that the piles of the existing bridge are set in sediment that could liquefy in a seismic event. However, in the section on geology/seismicity/soils, the letter indicates that the project site has a low potential for liquefaction. The DEIR should thoroughly substantiate the need for any features of the proposed project designed to address seismic stability that would also increase biological impacts.

STEPHENSON WORLEY GARRATT SCHWARTZ GARFIELD & PRAIRIE

TIMOTHY K. GARFIELD GREGORY C.M. GARRATT LAUREL LEE HYDE CAROL A. LEONE SARAH H. MASON DIANE B. MCCLOSKEY MICHAEL W PRAIRIE WILLIAM J. SCHWARTZ, JR. DIANE M. SEABERG GARY J. STEPHENSON DONALD R. WORLEY A LOUTED LIADLITY PARTNERSHEP LAWYERS 401 "B" Street, Suite 2400 San Diego, California 92101-4200

> OF COUNSEL: ELAINE L. CHAN KENT H. FOSTER RALPH E. HUGHES

Telephone (619) 696-3500

FACSIMILE (619) 696-3555

E-MAIL SDLAW@SWGSGP.COM

December 4, 2002

WRITER'S EXT.

Ms. Donna Clark, Associate Planner City of San Diego Development Services Dept. Land Development Review Division 1222 First Avenue, M.S. 501 San Diego, CA 92101

Re: Revised Notice of Preparation of Draft Joint EIR/EA

Dear Ms. Clark:

We represent Dr. and Mrs. T.C. Hu, whose family trust owns property at the southeast corner of Via de la Valle and El Camino Real.

For years the Hus have experienced drainage problems on their property because the City, over their objections, directed drainage from a convalescent home across Via de la Valle onto their property. The City allowed the developer to put pipes under Via de la Valle and to build a "headwall" on the Hus' property to divert drainage west along Via de la Valle. It was hoped the water would eventually drain into the San Dieguito River Valley. It has worked very poorly in that regard.

Copies of photographs of that construction and the resulting ponding are attached, as well as correspondence regarding same. In effect, the City has ignored their complaints over the years.

Now, with the bridge and road widening, the Hus are faced with a new problem. The raised elevation of the roadway will undoubtedly increase runoff and/or the velocity of runoff onto the Hu property. This needs to be addressed in the EIR/EA and appropriate mitigation measures adopted. The Hydrology section of the revised scoping letter is inadequate in this regard.

STEPHENSON WORLEY GARRATT SCHWARTZ GARFIELD & PRAIRIE, LLP

Donna Clark, Associate Planner City of San Diego December 4, 2002 Page 2

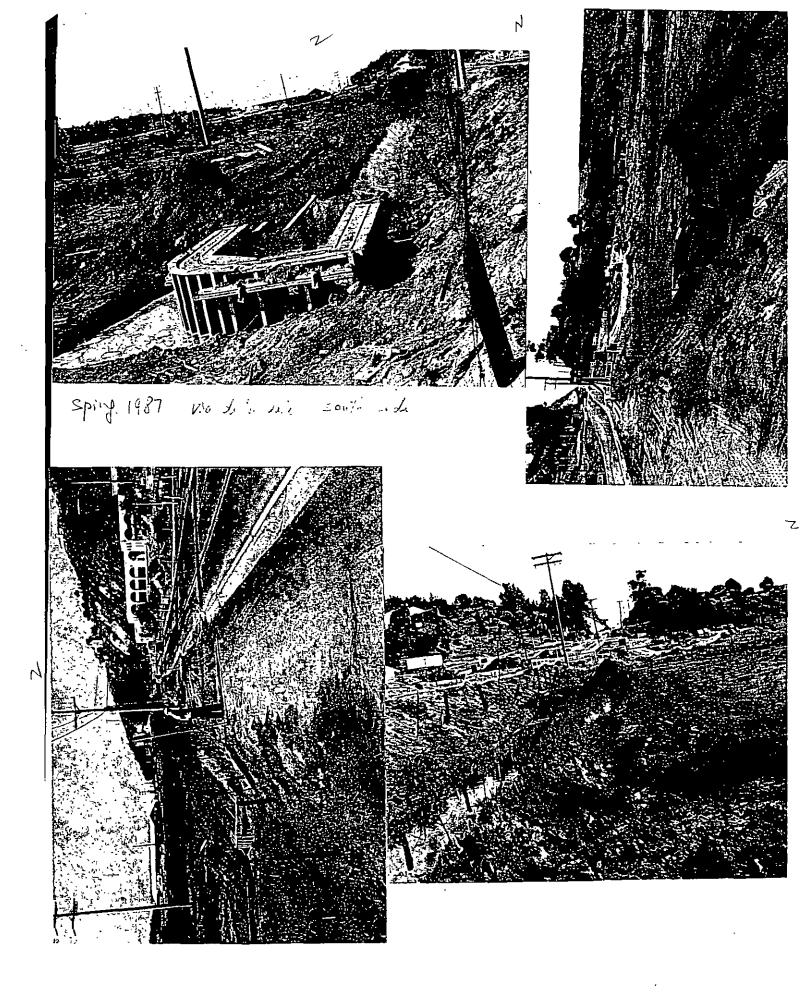
This project presents a unique opportunity to the City. The "hole" created by the proposed new elevation of El Camino Real can be filled as part of this project and it will not only solve the adverse drainage condition created by the City, and thus avoid further legal dispute, but also provide access to El Camino from the Hu property, as other adjacent properties enjoy access.

Because the whole purpose of the new project is to address flooding impacts in the area, it would seem logical to solve local drainage conditions which now exist and will be exacerbated by the project.

Please see to it that these problems are appropriately addressed in the Draft EIR/EA, and also please note my name and address for future notices.

Thank you for your courtesy and cooperation. Yours very trul Donald R. Worley

DRW:sc Encs. cc: Mr. & Mrs. Hu



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AMENTS:

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LSE REPLY BELOW IF POSSIBLE AND RETURN MATERIAL SUBMITTED WITH ROUTE SLIP

PONSE:	File No.:

Date: March 3, 1986

The drain pipe mentioned by Mrs. Hu does discharge into the floodplain of the San Dieguito River. To extend the pipe to the stream thread of the river would require installation of some 500 to 1,000 feet of pipe. Since extension of the pipe has no public benefit, expenditure of public funds for this purpose is not warranted.

RESPONSE E

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JASE:

February 28, 1986

Mrs. Hu was contacted by a Street Division supervisor and advised to contact E & D if she wishes to have the storm grain pipe extended. Extending the drain pipe in question is not the responsibility of the Street Division.

C. 3:

C. Buchanan General Utility Supervisor

200 ;





ABBE WOLFSHEIMER COUNCILMEMBER FIRST DISTRICT

April 2, 1986

Dr. T. C. Hu 8422 Prestwick Drive La Jolla, CA 92037

Dear Dr. Hu:

I have received a reply from the General Services Department and I am enclosing a copy for you.

If you have any additional questions, please do not hesitate to contact my office. Your interest on community matters is appreciated.

Sincerely,

aboe

Abbe Wolfsheimer Councilmember - District 1

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GEORGE S. DELAFIELD ROBERT G. SULLIVAN RICHARD D. HEDORNED ROBERT D. HIDDENOORT WILLIAM A. BRAMLEY N. ERIC V. BENMAM RANDOLPH C. HOUTS

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SULLIVAN, DELAFIELD, MCDONALD & MIDDENDORF A PROFESSIONAL CORPORATION ATTORNEYS AT LAW SECURITY PACIFIC PLAZA SUITE 1405 + 1200 THIRD AVENUE SAN DIEGO, CALIFORNIA 92101 TELEPHONE (619) 232-1400

February 19, 1987

John Fowler, Asst. City Manager CITY OF SAN DIEGO City Administration Building 202 C Street, Ninth Floor San Diego, California 92101

HAND DELIVERED

Dear Mr. Fowler:

This firm represents T. C. Hu, the owner of North County Riding Center, 3995 Via De La Valle in the County of San Diego. According to Mr. Hu, a retirement home is being built on an adjacent site by Roel Construction Company, Work No: TM-86-0245, Permit No: 230-85-D, Drawing No: 230-85-1-B.

discharge pipe has been installed at or near the boundary of the construction site and my client's property. This pipe apparently discharges water onto my client's property. Also, a fence was knocked down, property was trespassed on and dug up during the installation of this pipe.

Mr. Hu respectfully requests an immediate investigation of this matter and would like any necessary repairs to the fence and/or his property to be made by the contractor. Moreover, Mr. Hu would like insurance against further property damage resulting from the construction of the retirement home.

The address of Roel Construction Company is P. O. Box 80216, San Diego, California, 92138, the phone number is 297-4156, and the president is George Line.

If you have any questions or comments, please feel free to give me a call. Otherwise, you may contact Mr. Hu directly at his office (534-3854). Thank you for your time and attention.

Very truly yours,

SULLIVAN, DELAFIELD, MCDONALD & MIDDENDORF

RANDOLPH C. HOUTS

RCH:dkn cc: T.C. Hu



SAN DIEGO

1222 First Avenue • M.S. 407 • SAN DIEGO, CA 92101 TELEPHONE: (619) 236-6001

ENGINEERING & DEVELOPMENT DEPARTMENT

February 27, 1987

Sullivan, Delafield, McDonald & Middendorf Attorneys at Law Security Pacific Plaza 1200 Third Avenue, Suite 1405 San Deigo, CA 92101 RECEIVED MAR 3 1937 SULLIVAN, DELAFIELD, MODOMALD & MICDENDORF

Attention: Randolph C. Houts

Your letter of February 19, 1987, to Mr. Fowler, Assistant City Manager, has been referred to me for response.

A Conditional Use Permit (C.U.P.) for a convalescent hospital at the northeast corner of Via de la Valle and El Camino Real has been approved. One of the conditions of the C.U.P. is to improve the north side of Via de la Valle and the east side of El Camino Real. The existing 18" culvert under Via de la Valle, just east of El Camino Real, is not large enough to carry the anticipated run off from the drainage area, based on today's design standards. Therefore, an additional 18" pipe has been installed adjacent to the existing culvert. Also, a new headwall was constructed which will direct the water westerly along Via de la Valle, rather than directly on to your client's property. There are two other culverts under Via de la Valle in this area that are not being altered because of this development.

I talked to Mr. Hu, by telephone, a few days ago. I discussed with him why the additional culvert and headwall was constructed. I also discussed the damage to the fence and advised him to get in touch with the City Engineer's Inspector to get his assistance to get the fence repaired. He indicated that he had just talked to Mr. Allen in our Field Division, and that Mr. Allan would investigate and get back to him. Incidentally, the fence is not on the property line. It encroaches several feet inside the street right of way. The property line is 40 feet from the center of the street.

Your letter is being forwarded to our Field Division to follow up on the repair of the fence or any other damage that the contractor may have caused to your client's property.

C. R. LOCHHEAD Subdivision Engineer

cc: Fowler Zull SULLIVAN, DELAFIELD, MCDONALD & MIDDENDORF

GEORDE & DELARELO ROBERT G. SULLIVAN RCHARD D. HODONALD ROBERT D. HIDDENDORF WILLIAM A. BRAMLEY M. ERIC V. BENHAM RANDOLPH C. HOUTS A PROFESSIONAL CORPORATION ATTORNEYS AT LAW SECURITY PACIFIC PLAZA SUITE 1405 • 1200 THIRD AVENUE SAN DIEGO, CALIFORNIA 92101 TELEPHONE (619) 232-1400

March 3, 1987

Mr. T. C. Hu 8422 Prestwick Drive La Jolla, California 92037

Re: Drainage Problem on Via De La Valle Property

Dear Mr. Hu:

Enclosed please find a copy of a letter I received from the City of San Diego regarding your complaint with respect to the construction of a convalescent hospital adjacent to your property located on Via De La Valle.

Pursuant to our conversations, I plan to take no further action on this matter without your specific instruction. If you have any questions or comments, please feel free to give myself or Mr. Middendorf a call.

Sincerely yours,

SULLIVAN, DELAFIELD, MCDONALD & MIDDENDORF

RANDOLPH C. HOUTS

RCH:dkn Enclosure

J. B.YOUNG & associates, Itd

February 27, 1987

Professor T. C. Hu Computer Science Center University of California - San Diego C-14 La Jolla, California 92093

SUBJECT: Drainage along Via De La Valle

Dear Professor Hu:

This summarizes our understanding of your conversation with our Paul Danielson on February 26, 1987. It is our understanding that we have permission to grade on your property in the area around the headwall. We will restore the damaged areas of your property near the headwall to their original condition. The wire fence, running parallel to Via De La Valle, will be repaired in the area of the headwall.

Grading operations will begin when the area dries from the recent rains. We will call you at 534-3854 not less than 24 hours before we plan to enter your property.

If any further information is required, please feel free to contact us. If our understanding of this matter is not correct, as outlined above, please notify us immediately so that corrective action can be taken. Thank you for your cooperation and understanding.

Very truly yours,

JB YOUNG & ASSOCIATES, LTD.

Jeffery B. Young Principal

PBD/JBY/gb YAWO: 8607

cc: Robert Stowell, Roel Construction Company, Inc.

Appendix B

404(b)(1) Guidelines Information

APPENDIX B 404(b)(1) GUIDELINES INFORMATION

Relevant policies of the 404(b)(1) Guidelines include the following:

230.70 (b) Designing the discharge to avoid a disruption of periodic water inundation patterns

230.71

230.71(a) Disposal of dredged material in such a manner that physiochemical conditions are maintained and the potency and availability of pollutants are reduced.

230.71 (b) Limiting the solid, liquid, and gaseous components of material to be discharged at a particular site.

230.71 (c) Adding treatment substances to the discharge material.

230.71 (d) Utilizing chemical flocculants to enhance the deposition of suspended particulates in diked disposal areas.

Sec. 230.73 Actions affecting the method of dispersion.

The effects of a discharge can be minimized by the manner in which it is dispersed, such as:

230.73(a) Where environmentally desirable, distributing the dredged material widely in a thin layer at the disposal site to maintain natural substrate contours and elevation.

230.73(b) Orienting a dredged or fill material mound to minimize undesirable obstruction to the water current or circulation pattern, and utilizing natural bottom contours to minimize the size of the mound.

230.73(c) Using silt screens or other appropriate methods to confine suspended particulate/turbidity to a small area where settling or removal can occur.

230.73(d) Making use of currents and circulation patterns to mix, disperse and dilute the discharge.

230.73(e) Minimizing water column turbidity by using a submerged diffuser system. A similar effect can be accomplished by submerging pipeline discharges or otherwise releasing materials near the bottom.

230.73(f) Selecting sites or managing discharges to confine and minimize the release of suspended particulates to give decreased turbidity levels and to maintain light penetration for organisms.

230.73(g) Setting limitations on the amount of material to be discharged per unit of time or volume of receiving water.

Sec. 230.74 Actions related to technology.

Discharge technology should be adapted to the needs of each site. In determining whether the discharge operation sufficiently minimizes adverse environmental impacts, the applicant should consider:

230.74(a) Using appropriate equipment or machinery, including protective devices, and the use of such equipment or machinery in activities related to the discharge of dredged or fill material.

230.74(b) Employing appropriate maintenance and operation on equipment or machinery, including adequate training, staffing, and working procedures.

230.74(c) Using machinery and techniques that are especially designed to reduce damage to wetlands. This may include machines equipped with devices that scatter rather than mound excavated materials, machines with specially designed wheels or tracks, and the use of mats under heavy machines to reduce wetland surface compaction and rutting.

230.74(d) Designing access roads and channel spanning structures using culverts, open channels, and diversions that will pass both low and high water flows, accommodate fluctuating water levels, and maintain circulation and faunal movement.

230.74(e) Employing appropriate machinery and methods of transport of the material for discharge.

Sec. 230.75 Actions affecting plant and animal populations.

Minimization of adverse effects on populations of plants and animals can be achieved by:

(a) Avoiding changes in water current and circulation patterns which would interfere with the movement of animals;

(b) Selecting sites or managing discharges to prevent or avoid creating habitat conducive to the development of undesirable predators or species which have a competitive edge ecologically over indigenous plants or animals;

(c) Avoiding sites having unique habitat or other value, including habitat of threatened or endangered species;

(d) Using planning and construction practices to institute habitat development and restoration to produce a new or modified environmental state of higher ecological value by displacement of some or all of the existing environmental characteristics. Habitat development and restoration techniques can be used to minimize adverse impacts and to compensate for destroyed habitat. Use techniques that have been demonstrated to be effective in circumstances similar to those under consideration wherever possible. Where proposed development and restoration techniques have not yet advanced to the pilot demonstration stage, initiate their use on a small scale to allow corrective action if unanticipated adverse impacts occur;

(e) Timing discharge to avoid spawning or migration seasons and other biologically critical time periods;

(f) Avoiding the destruction of remnant natural sites within areas already affected by development.

Sec. 230.76 Actions affecting human use.

Minimization of adverse effects on human use potential may be achieved by:

230.76(a) Selecting discharge sites and following discharge procedures to prevent or minimize any potential damage to the aesthetically pleasing features of the aquatic site (e.g. viewscapes), particularly with respect to water quality.

230.76(b) Selecting disposal sites which are not valuable as natural aquatic areas.

230.76(c) Timing the discharge to avoid the seasons or periods when human recreational activity associated with the aquatic site is most important.

230.76(d) Following discharge procedures which avoid or minimize the disturbance of aesthetic features of an aquatic site or ecosystem.

230.76(e) Selecting sites that will not be detrimental or increase incompatible human activity, or require the need for frequent dredge or fill maintenance activity in remote fish and wildlife areas.

(f) Locating the disposal site outside of the vicinity of a public water supply intake.

Sec. 230.77 Other actions.

230.77(a) In the case of fills, controlling runoff and other discharges from activities to be conducted on the fill.

230.77(b) In the case of dams, designing water releases to accommodate the needs of fish and wildlife.

230.77(c) In dredging projects funded by Federal agencies other than the Corps of Engineers, maintain desired water quality of the return discharge through agreement with the Federal funding authority on scientifically defensible pollutant concentration levels in addition to any applicable water quality standards.

230.77(d) When a significant ecological change in the aquatic environment is proposed by the discharge of dredged or fill material, the permitting authority should consider the ecosystem that will be lost as well as the environmental benefits of the new system.

230.10

(b) No discharge of dredged or fill material shall be permitted if it:

(1) Causes or contributes, after consideration of disposal site dilution and dispersion, to violations of any applicable State water quality standard;

(2) Violates any applicable toxic effluent standard or prohibition under section 307 of the Act;

(3) Jeopardizes the continued existence of species listed as endangered or threatened under the Endangered Species Act of 1973, as amended, or results in likelihood of the destruction or adverse modification of a habitat which is determined by the Secretary of Interior or Commerce, as appropriate, to be a critical habitat under the Endangered Species Act of 1973, as amended. If an exemption has been granted by the Endangered Species Committee, the terms of such exemption shall apply in lieu of this subparagraph;

(4) Violates any requirement imposed by the Secretary of Commerce to protect any marine sanctuary designated under title III of the Marine Protection, Research, and Sanctuaries Act of 1972.

(c) Except as provided under section 404(b)(2), no discharge of dredged or fill material shall be permitted which will cause or contribute to significant degradation of the waters of the United

States. Findings of significant degradation related to the proposed discharge shall be based upon appropriate factual determinations, evaluations, and tests required by subparts B and G, after consideration of subparts C through F, with special emphasis on the persistence and permanence of the effects outlined in those subparts. Under these Guidelines, effects contributing to significant degradation considered individually or collectively, include:

(1) Significantly adverse effects of the discharge of pollutants on human health or welfare, including but not limited to effects on municipal water supplies, plankton, fish, shellfish, wildlife, and special aquatic sites.

(2) Significantly adverse effects of the discharge of pollutants on life stages of aquatic life and other wildlife dependent on aquatic ecosystems, including the transfer, concentration, and spread of pollutants or their byproducts outside of the disposal site through biological, physical, and chemical processes;

(3) Significantly adverse effects of the discharge of pollutants on aquatic ecosystem diversity, productivity, and stability. Such effects may include, but are not limited to, loss of fish and wildlife habitat or loss of the capacity of a wetland to assimilate nutrients, purify water, or reduce wave energy; or

(4) Significantly adverse effects of discharge of pollutants on recreational, aesthetic, and economic values.

Appendix C

Agency Correspondence

From: Greer, Keith [mailto:Keith.Greer@sandag.org]
Sent: Tuesday, May 20, 2014 11:19 AM
To: Marsden, Dean
Cc: 'Lavender-Martin, Sandra E@DOT'
Subject: RE: REMP Working Group Meeting Minutes (I-5 NCC Project)

Dean – Here are the USFWS, USACE-LA and CCC emails regarding the language on temporary impacts associates with the lagoon enhancements.

Sandra can you pass along Tim Dillingham's comments and any comments from the Carlsbad USACE.

What this means for you, is that the resources agencies are not going to require that we mitigate areas of wetlands that we impact. We may not get credit, but they will not call them an impact and there will be no ratio applied to the restoration.

If you have any question please call.

Keith Greer, SANDAG 619-699-7390

From: Brown, Sally [mailto:sally_brown@fws.gov] Sent: Tuesday, May 20, 2014 11:12 AM

To: Lavender-Martin, Sandra E@DOT

Cc: aevans@dudek.com; Kosup, Allan R@DOT; awinecki@dudek.com; Jacobo, Arturo@DOT; Bryant.Chesney@noaa.gov; April, Bruce@DOT; goldmann.elizabeth@epa.gov; Buhr, Gabriel@Coastal; Greer, Keith; Smith, Kim T@DOT; Porter, Mike@Waterboards; McCaffery, Emery@DOT; Harrison, Shay Lynn M@DOT; Spencer.D.Macneil@usace.army.mil; Stephanie.J.Hall@usace.army.mil; Scatolini, Susan@DOT; susan_wynn@fws.gov; Brown, Kanani@Coastal; mcooper@scc.ca.gov; Larry.Vinzant@dot.gov; tim_dillingham@wildlife.ca.gov; Therese.O.Bradford@usace.army.mil; Meris.Bantilan-Smith@usace.army.mil **Subject:** Re: FW: Temporary Impact/Mitigation Language + REMP WKGP Structure

Subject: Re: FW: Temporary Impact/willigation Language + REMP WKGP Structure

Hi Sandra, Susan and I have no further comments, thanks for the opportunity to review!

Sally Brown U. S. Fish and Wildlife Service 2177 Salk Avenue, Suite 250 Carlsbad, CA 92008 Office: (760) 431-9440 x278 Cell: (619) 261-6027 FAX: (760) 431-5901 Sally Brown@fws.gov

From: Hall, Stephanie J SPL [mailto:Stephanie.J.Hall@usace.army.mil] Sent: Tuesday, May 20, 2014 9:58 AM To: Buhr, Gabriel@Coastal; Lavender-Martin, Sandra E@DOT; aevans@dudek.com; Kosup, Allan R@DOT; awinecki@dudek.com; Jacobo, Arturo@DOT; Bryant.Chesney@noaa.gov; April, Bruce@DOT; goldmann.elizabeth@epa.gov; Greer, Keith; Smith, Kim T@DOT; Porter, Mike@Waterboards; McCaffery, Emery@DOT; Sally_Brown@fws.gov; Harrison, Shay Lynn M@DOT; Macneil, Spencer D SPL; Scatolini, Susan@DOT; susan_wynn@fws.gov; Brown, Kanani@Coastal; mcooper@scc.ca.gov; Larry.Vinzant@dot.gov; tim_dillingham@wildlife.ca.gov; Bradford, Therese O. SPL; Bantilan-Smith, Meris SPL

Subject: RE: Temporary Impact/Mitigation Language + REMP WKGP Structure (UNCLASSIFIED)

Classification: UNCLASSIFIED Caveats: NONE

Sorry Sandra,

The Corps is also fine with the language regarding "Temporary Impact/Mitigation Language below...

-Stephanie

Stephanie J. Hall Senior Project Manager, Caltrans Liaison Transportation & Special Projects Branch USACE Los Angles District, Regulatory Division 915 Wilshire Blvd, Suite 930, Los Angeles, California 90017-3401 P: 213.452.3410 | M: 213.304.9682 | F: 213.452.4196

Assist us in better serving you! You are invited to complete our customer survey, located at the following link: http://corpsmapu.usace.army.mil/cm_apex/f?p=regulatory_survey

From: Buhr, Gabriel@Coastal [mailto:Gabriel.Buhr@coastal.ca.gov]

Sent: Tuesday, May 20, 2014 8:07 AM

To: Lavender-Martin, Sandra E@DOT; aevans@dudek.com; Kosup, Allan R@DOT; awinecki@dudek.com; Jacobo, Arturo@DOT; Bryant.Chesney@noaa.gov; April, Bruce@DOT; goldmann.elizabeth@epa.gov; Greer, Keith; Smith, Kim T@DOT; Porter, Mike@Waterboards; McCaffery, Emery@DOT; Sally_Brown@fws.gov; Harrison, Shay Lynn M@DOT; Spencer.D.Macneil@usace.army.mil; Stephanie.J.Hall@usace.army.mil; Scatolini, Susan@DOT; susan_wynn@fws.gov; Brown, Kanani@Coastal; mcooper@scc.ca.gov; Larry.Vinzant@dot.gov; tim_dillingham@wildlife.ca.gov; Therese.O.Bradford@usace.army.mil; Meris.Bantilan-Smith@usace.army.mil Subject: RE: Temporary Impact/Mitigation Language + REMP WKGP Structure

Both look fine to me Sandra.

Coastal Program Manager

On Tue, May 20, 2014 at 7:58 AM, Lavender-Martin, Sandra E@DOT <<u>sandra.lavender@dot.ca.gov</u>> wrote:

Good Morning Everyone!

Just following up to see if anyone has any comments on the attached REMP Structure and/or the Temporary Impact Language below. To date, I have only received comments from Tim. Please provide any comments by this Thursday COB, so that these items can be finalized.

Thank you,

Sandra

From: Lavender-Martin, Sandra E@DOT

Sent: Monday, April 28, 2014 3:44 PM

To: 'aevans@dudek.com'; 'allan_kosup@dot.ca.gov'; 'awinecki@dudek.com'; 'arturo_jacobo@dot.ca.gov'; 'Bryant.Chesney@noaa.gov'; 'bruce_april@dot.ca.gov'; 'goldmann.elizabeth@epa.gov'; 'gbuhr@coastal.ca.gov'; 'kgr@sandag.org'; 'kim_t_smith@dot.ca.gov'; 'mporter@waterboards.ca.gov'; 'emery_mccaffery@dot.ca.gov'; 'Sally_Brown@fws.gov'; 'shay_lynn_harrison@dot.ca.gov'; 'Spencer.D.Macneil@usace.army.mil'; 'Stephanie.J.Hall@usace.army.mil'; 'susan_scatolini@dot.ca.gov'; 'susan_wynn@fws.gov'; 'kbrown@coastal.ca.gov'; 'mcooper@scc.ca.gov'; 'Larry.Vinzant@dot.gov'; 'tim_dillingham@wildlife.ca.gov'; 'Therese.O.Bradford@usace.army.mil'; 'Meris.Bantilan-Smith@usace.army.mil' **Subject:** Temporary Impact/Mitigation Language + REMP WKGP Structure

•

Hello Everyone,

The proposed temporary impact/mitigation language for the REMP is below. The poposed structure for the REMP Working Group has been revised to include all edits received to date. Please review both and provide comments by Tuesday, May 6th.

Temporary Impact/Mitigation Language

Implementation of Resource Mitigation and Enhancement Program (REMP) as outlined in the NCC Public Works Plan will result in some temporary impacts to low quality wetlands, such as disturbed wetlands and non-tidal salt marsh, to re-establish, restore, and enhance high quality tidal and freshwater wetlands. Any potential impacts resulting from the re-establishment, restoration, and enhancement will be identified in the site specific HMMPs. No additional mitigation would be required for these temporary impacts as long as there is a net benefit or a significant increase in quality and function of the re-established/restored/enhanced wetlands. If any portion of the mitigation site fails to meet its success criteria under the HMMP, no credits would be released and mitigation for temporary impacts maybe required at that time.

Thank you, Sandra

Sandra Lavender-Martín

Associate Environmental Planner Department of Transportation - District 11 Environmental Stewardship/Ecological Studies Branch P: (619) 688-0115

CITY OF SAN DIEGO EL CAMINO REAL ROAD/BRIDGE PROJECT AGENCIES MEETING

Meeting Notes for September 26, 2012

Attendees

City: Kerry Santoro, Jerry Jakubauskas, Brad Johnson Rick Engineering: Edgar Camerino, Brendan Hastie RECON: Lisa Lind Hon Consulting: Katherine Hon Nordby Biological: Chris Nordby RBF: Monica Kling Caltrans: Kevin Hovey, Bob James CDFG: Tim Dillingham, Libby Lucas, Kyle Dutro US Fish and Wildlife: Sally Brown USACOE: Michelle Madsen, Stephanie Hall State Water Board: Alan Monji

Discussion

1. Review of Project Purpose and Need (City) – Following introductions, Kerry provided an overview of the project, including the project purpose related to the structural deficiencies and potential flood hazards of the existing El Camino Real Bridge. The bridge is not high enough for a 100 year flood event and does not meet current seismic standards.

2. Background/History/Timetable (City) – 1998 FHWA approved funding for the project with a 10-year timeline. In 2006 a Draft EIR was circulated for public review. Since that time, the City has been looking into additional alternatives and narrowing the footprint in response to community and agency concerns. The City also updated technical studies. The City was also granted an extension from FHWA and as a result is looking to complete the environmental by March 2013. Because the March 2013 deadline may not be met, Caltrans on behalf of the City has requested an unprecedented second extension. The City is currently waiting for the FHWA decision.

3. Current Project/Changes from Past Project - Bridge Design (Rick Engineering) - Edgar and Brendan reviewed the major changes, including: a reduction of 18-feet for the cross sections with reduced widths for travel lanes, bicycle lanes, and medians, a new tie-in to the D R Horton project, and eliminating the channel on the Kruer (former Hu) property in place of a new storm drain plan. Removal of the existing bridge after construction of a new bridge, and the introduction of roundabout alternatives are also changes from the past project. USACOE requested clarification on the length of the bridge and requested that a longer bridge be evaluated. Brendan indicated that the proposed bridge meets the hydraulic requirements. A longer bridge is discussed in the Alternatives Considered but Rejected chapter of both the EIR and the EA. The current proposed bridge design maintains the width of the channel for the protection of clapper rail habitat, and a longer bridge would not provide a benefit to clapper rail habitat. The river channel only carries the 10-year flow within its banks. Higher flows overtop the river banks. The substructure of the bridge needs to be clearly defined and may need to be retained so as not to negatively affect that area. All aboveground elements of the existing bridge will be removed entirely. When the engineers say the "substructure" would remain, they mean the buried piles. Rick Engineering clarified that the bridge for the Eastern Alignment and Roundabout alternatives is at an angle for geometry, so the road can meet De La Valle Place. This design does not affect hydraulics because the columns are round.

Agencies requested additional exhibits be added to the document, including an existing cross-section and a cross-section exhibit for each of the project alternatives. In addition, the location of the sewer line and protective rip rap blanket should be noted. Sally would like to see the rip rap blanket removed if it isn't

necessary to protect the columns; however, we need to look at whether a stabilized river bed may be something the clapper rail like and therefore replacing the rip rap blanket would be needed to avoid impacts.

The agencies requested that the environmental documents disclose that this project would not limit or preclude what can happen on the Fairbanks Ranch property, including creation of additional riparian areas. CDFG clarified that the diagram of mitigation that was supposed to occur attached to their 2006 letter was to be a gentle transition of freshwater marsh with riparian scrub terrace, not a widening of the river.

Michelle asked for clarification of the City departments and Kerry explained what Real Estate Assets, Development Services, and Capital Improvements do.

4. Bridge Construction Methodology Memorandum (Rick Engineering) – Rick Engineering discussed the two methodologies that will be included in the Draft EIR: berm versus trestle. The agencies provided their major concerns: berm would result in fill and a potential for washout during a significant rain event while the trestle would require piles for false work. The trestle would allow construction equipment to be above low river flows. CDFG requested data for sediment transport through the river channel and clear description of the materials that will be used to construct the berm. Kevin suggested that the environmental documents explain what storm event might wash out a berm. USACOE said the trestle may be preferable to the berm for construction; however, the agencies did not identify a preferred method and noted they will wait until the Draft EIR is out for public review in order to assess impacts for both options. All are looking for analysis that considers wildlife movement, hydrology, and duration of construction.

5. Other Impacts/Concerns (Nordby/Agencies) – USFWS brought up potential impacts to mule-fat scrub as a result of the grading under the north abutment. Brad mentioned that the north bridge abutment of the new bridge will be approximately 9 feet higher than the existing bridge, and as a result of the new fill, the existing vegetation will be disturbed regardless of whether or not a trail is constructed. There was confusion about the map of biological impacts showing impacts west of the existing bridge, and this needs to be clarified. The north abutment has been designed to accommodate a planned JPA trail. Per NEPA Section 4(f) requirements the project must not preclude any existing or future (planned) trail. This issue will be looked at. Eastern Alignment as City preferred alternative was raised as a concern by both wildlife agencies due to potential wetland impacts. Environmental documents need to clearly state impacts from all alternatives. Kevin stated Caltrans does not know yet which alternative is less impactive, and emphasized they have to consider more than biological resources impacts.

6. Mitigation (City/Nordby/Agencies) - Project impacts include disturbance of the salt marsh on the Kruer property, however mitigation for this vegetation community is not available on the JPA mitigation site for this project. There would be excess freshwater marsh creation available to satisfy the other mitigation requirements, and that could include Clapper Rail habitat mitigation needs. Chris noted that the mitigation approach to be ultimately approved will dictate if the JPA mitigation site can accommodate all of the mitigation needs for the project. Michelle noted that a proposed invasives removal plan in the river that would be implemented sooner rather than later would be viewed favorably. They are looking for a watershed approach. Tamarisk and pampas grass removal upstream would help protect the future W-19 restoration and the San Dieguito Lagoon restoration downstream. She suggested proposing this aspect as part of the mitigation plan rather than having the agencies require it as maintenance. Libby asked what was the invasive removal requirement for Fairbanks Ranch and the Polo Field code violation. This cannot be counted twice and may limit the "credit" for invasive removal plans as part of El Camino Real. Michelle stated they understand the expense associated with the "in perpetuity" requirement and would accept a defined time frame. The City will confirm if this mitigation has already been established as mitigation for the Fairbanks Ranch project and if it would be a viable option for this project. The agencies were interested in what would happen to the vacated roadway. Sally, Michelle and Libby agreed they would like to see the asphalt removed. Jerry explained that a portion will need to be retained for access to adjacent properties. The agencies asked if any of the W-19 acreage would be available for Fairbanks Ranch mitigation, and Kerry said she didn't think so, given the number of projects already wanting to use the mitigation area, including LOSSAN, I-5 widening, and EI Camino Real.

From: Elizabeth Lucas [mailto:ELucas@dfg.ca.gov]
Sent: Thursday, November 15, 2012 12:50 PM
To: Santoro, Kerry
Cc: Kyle Dutro; Tim Dillingham; 'kevin_hovey@dot.ca.gov'; 'Robert A James'; Sally Brown@fws.gov; nordbybio@gmail.com; aashimine@rbf.com; 'Lisa Lind'; bhastie@rickengineering.com; ecamerino@rickengineering.com; Johnson, Brad; Marsden, Dean; Jerry Jakubauskas; Michelle L SPL Mattson; stephanie.j.hall@usace.army.mil; Alan@Waterboards' 'Monji
Subject: El Camino Real Project Update Meeting Minutes

Hello Kerry,

Thank you for the minutes of the 9-26 meeting on the El Camino Real Bridge Project (Project). Just for the record, the minutes did not capture the following two points made during the meeting (for our purposes, this email effectively modifies the minutes).

1. DFG requested that the recirculated EIR address all the comments in the Wildlife Agencies' October 26, 2006, letter on the draft EIR for the Project.

2. Because the equestrian trail was a subject of significant discussion during the meeting, DFG explicitly pointed to comment #11 in that 2006 letter; that comment addresses the need for the EIR to include in its analysis the impacts of the equestrian trail (not just the grading for the trail).

Regarding the discussion of invasive species removal in San Dieguito River (item #6 in the minutes), attached is DFG's 2003 letter re: the last nine holes of the Fairbanks Ranch golf course; see #7 on page 4 re: the invasive species removal within the River. I assume that the City also required on-going invasive species removal within this reach of the River, but don't know for sure.

I think you were going to include the sign-in sheet for the 9-26 meeting with the minutes. Would you please email it out now?

Thank you.

Libby

Libby Lucas Staff Environmental Scientist NCCP Program California Department of Fish and Game 3883 Ruffin Road San Diego CA 92123 Phone: 858 467-4230 Fax: 858 467-4299 e-mail: <u>ELucas@dfg.ca.gov</u>



GRAY DAVIS, Governor

DEPARTMENT OF FISH AND GAME http://www.dfg.ca.gov 4949 Viewridge Avenue San Diego, CA 92123 (858) 467-4201



June 9, 2003

Jon Petke The Planning Associate 3151 Airway Avenue, Suite R-1 Costa Mesa, CA 92626

Subject: Notification of Lake or Streambed Alteration Notification No. R5-2003-0139 (Fairbanks Ranch Country Club Golf Course Completion)

Dear Mr. Petke;

This letter is in response to the Lake or Streambed Alteration Notification Package (No. R5-2003-0135) that you submitted to the Department of Fish and Game (Department) for your proposed completion of the Fairbanks Ranch Country Club's golf course, located within the City of San Diego, San Diego County.

The Fairbanks Ranch Country Club's ("FRCC") project restarts construction work to complete the nine "holes" necessary to make the existing 18 holes of golf consistent with the originally approved 27-hole golf course complex, and complete the restoration of wetland/riparian habitats. The Department originally authorized the 27-hole golf course project pursuant to Streambed Alteration Agreement Notification No.V-82-311, issued on January 20, 1983. The northern perimeter of the project (i.e., the south river channel) was designed and approved for an earthen berm and rip-rap with a variable slope gradient built up to the 22-23 foot contour. It was constructed as designed along most of the realigned river, but in the area now targeted for completion of the nine holes of golf, the interim grading has built the area up to the approximate 10-14 foot level.

Project Description

FRCC purposes to complete construction of the golf course substantially as it was originally designed and authorized, with the construction of the final nine "holes" of golf. This work also includes raising the river channel berm on the northern edge of the construction site to its originally designed 22-23 foot contour level.

In completing the golf course complex, FRCC will undertake to enhance and maintain existing riparian habitat, and create new riparian habitat, using the native riparian plants prescribed by the original Landscape Concept Plan. See attached <u>Table 1</u> and <u>Exhibits D-1 and D-2</u> for the

listing and location of the existing 97 acres of riparian habitat, its status and its proposed enhancement ("use area" 1-3), and the proposal to create 12 new acres of marsh and riparian inter-connected habitat ("use area" 4 on Exhibit D-2) that is included as part of the proposed completion of the remaining nine holes of golf. The result is 109 acres of riparian habitat. The location of these wetlands is generally conforming to the original project description; however, FRCC has proposed to shift approximately 12 acres of mitigation area from the northern edge of the San Dieguito River to the south. FRCC shall annually monitor and report to the Department for five years on the status of this riparian habitat enhancement and creation undertaking.

Although not required by any project approvals nor credited as habitat mitigation by the Department, FRCC has committed to incorporate an additional 15 acres of marsh and/or riparian habitat into the nine hole golf course design ("use area" 7, 8 on <u>Table 1</u>, as depicted on <u>Exhibits</u> <u>D-1 and E</u>). Combining this with the existing 4 acres of preserved willow pond ("use area" 5) and the 19 acres of previously created lakes on the existing 18-hole golf course ("use area" 6), the overall aquatic/riparian habitat total associated with the 27-hole complex will be 147 acres. See <u>Table 1</u>.

Described in more detail below is the planned construction associated with the completion of the nine holes of golf and the planned work on the existing river channel berm.

Golf Course Construction Work

The nine hole construction project will involve clearing and grubbing, depositing additional clean fill and associated rough grading to reconfigure the construction base, and finally, finished contour grading and installation of the golf course components (tee boxes, fairways, greens, cart path, etc.). See Exhibit F for a schematic of the finished site.

Environmental Commitments:

- At a minimum, a total of 109 acres of riparian habitat will be enhanced, maintained, and created as described on <u>Table 1</u>, including 12 new acres of interconnected marsh and riparian habitat incorporated into the design of the 9-hole golf course completion ("use area" 4 on <u>Table 1</u>).
- A soft-bottom overpass structure will be created for the existing golf course cart path that currently crosses through the existing depression located in "Area 1" on <u>Exhibit D-2</u>. The will allow for a natural habitat corridor connection between the planned riparian areas in the nine hole construction area and the San Dieguito River channel.

River Channel Berm Work

The river channel berm work will involve widening the inland reach of the river's south

perimeter with an approximately ten-foot setback and raising its berm height from the existing 10-14 feet to 22-23 feet. No construction work, equipment or workers will be operating within the existing riparian vegetation. This will be accomplished by staking the upland edge of the existing riparian vegetation dripline (including any pickleweed that is part of the riparian line of vegetation). An additional 5-foot buffer will be added to this exclusion zone.

Above the 5-foot buffer, the existing berm will be widened in the upland area (*i.e.*, away from the riparian vegetation) and raised by excavating into the existing graded area down to the water line and sloping the reconfigured berm back, with additional earthen fill, to its new height of 22-23 feet. Native planting with trees and shrubs from the approved Landscape Plan will be installed to stabilize the berm slope. Subject to specific field construction opportunities, the excavated portion of the berm cut will only be partially backfilled so as to leave a "shelf" along the river's edge that will be conducive to the establishment of riparian willows and other native riparian species. See Exhibits G-1, G-2, G-3 for a series of schematics illustrating this construction work.

Environmental Commitments:

- 3. All work will be conducted above a five foot buffer measured from the 8-10 foot contour line which describes the upland edge of the river's riparian vegetation. This line will be staked and contractors will be required to keep men and equipment on the upland side of this line.
- 4. Best management practices will be employed to insure that the construction work will not result in discharges to the river. These BMPs, summarized from the SWPPP, include, but are not limited to:
 - a Vehicle and equipment service
 - b. Material delivery, handling and storage
 - c. Dust control
 - d. Sediment basins
 - e. Slope stabilization
 - f. Drain inlet protection
 - g. Spill prevention and response.
- 5. Once completed, the river side berm will be vegetated with native riparian and upland plant species from the Landscape Plan's approved plant list. See <u>Exhibit H</u>. Generally, Sand Bar Willow Thickets, Arroyo Willow Forest, and Black Willow Hummocks will be planted in the lower reaches of the river berm, and groves of cottonwood and sycamores will be planted in the upper reaches. The source plant material will include, to the extent available, seeds and cuttings recovered from the riparian species that can occasionally be found growing in upland areas away from

the existing riparian vegetation line.

- 6. All earth moving work will occur between April 15th and October 15th, 2003 (unless otherwise approved by the Department).
- On an annual basis, the FRCC will cause the removal of non-native vegetation in the San Dieguito river channel south perimeter and throughout the riparian areas of the completed 9-hole area.

In the river channel itself, the non-native plant removal will focus on hand removal of tamarisk; however, if other invasive exotic species are encountered, they will also be removed. The only equipment used in the river channel will be hand held chainsaws and other handheld tools. Removal of the tamarisk trees will be carefully undertaken in a manner to avoid, to the extent practicable, any adverse effect on the existing native riparian habitat. The tamarisk removal is scheduled to occur after September 15th of this year, but before the onset of the rainy season. If necessary due to early rains, tamarisk removal would be continued until the fall of 2004.

Enhancement activities shall comply with California Fish and Game Code Section 3503, which prohibits the take, possession or needless destruction of the nest or eggs of any bird. Therefore, unless a nesting survey is conducted by qualified biologist seven-days (or less) prior to riparian habitat enhancement activities, such activities will be conducted out-side of nesting season (March 15 through July 31). All nest sites shall be avoided until the nest is no longer active, and the young are no-longer dependent on the parent(s). A minimum 100-foot work exclusion zone will be established around an active nest by using flagging ribbon, or similar method. The work exclusion zone could be modified, based on the sensitivity of the species to human presence and activity. The Department shall be provided copies of the biologist's field notes for the nesting survey prior to commencing activities.

Construction practices common to work on both the river channel berm and the golf course construction will include pre-construction surveys by qualified biologists for nesting birds as well as any endangered or threatened species, including the least Bell's vireo among others. Construction will not commence without the advance approval of the Department in any area where nesting birds or any listed species are found. A one million dollar construction bond is posted in favor of the City of San Diego to financially guarantee the completion of the project elements, including the proposed riparian habitat enhancement and creation work described herein. FRCC will cause a post-construction monitoring report to be completed by a qualified biologist which will evaluate the effect of the environmental commitments and will make recommendations, if any are required, to address any documented shortcoming in the intended effect of the commitments. This document will be provided to the Department for review and

comment.

FRCC intends for the subject grading work to commence during June 2003. FRCC's contractor is Ranger Construction Industries, Inc. All earth moving work is scheduled for completion by October 15, 2003.

To help evaluate and monitor the success of these commitments, FRCC has given permission for site visits from any representative of the Department at any time. For safety and liability purposes, FRCC requests that the Department give as much advance notice as possible prior to visiting the site so that appropriate arrangements can be made. Please note that Department Peace Officers have authority per law to enter onto properties when they are carryout their law enforcement duties, and no statements in this letter should be interpreted to limit a Department Peace Officer's right of entry as defined by State law.

Conclusion

Based on the Department's review of the information you submitted and through a site visit (conducted by Don Chadwick of the Department), the Department has determined that a Streambed or Lake Alteration Agreement is not required for your project or activity because the project or activity 1) does not substantially divert, obstruct, or change any natural flow or bed, channel, or bank of a river, stream, or lake, or 2) use material from a streambed, or 3) substantially adversely effect existing fish or wildlife resources.

As a result, you may begin your project or activity if you have obtained all other necessary permits. If the project or activity changes from that stated in the submitted notification package above, a new notification shall be submitted to the Department.

Nothing in this letter authorizes the Operator to trespass on any land or property, nor does it relieve the Operator of responsibility for compliance with applicable federal, state, or local laws or ordinances. This letter does not constitute the Department's endorsement of the proposed project or activity, or assures the Department's concurrence with permits required form other agencies.

A copy of this letter and attachments thereto should be readily available at the work site(s) at all times during periods of active work and must be presented to any Department personnel, or personnel from another agency upon demand.

Sincerely,

4 R. Mandurak

Donald R. Chadwick Senior Environmental Scientist

Attachments:

- Table-1 Exhibit D-1 Exhibit D-2 Exhibit E Exhibit F Exhibit G-1 Exhibit G-2 Exhibit G-3 Exhibit H
- cc: Stream Alteration Compliance Team Cathy Cibit, City of San Diego

TABLE 1

SUMMARY OF RIPARIAN AREAS

The table below is a summary Project Description of the existing and proposed riparian areas associated with FRCC's proposed completion of the 9-holes of golf at its existing golf course.

Use Area Number	Area of Use	Riparian Acreage	Current Status	Project Description
1	Excavated Channel	65 <u>+</u> 1	Riparian vegetation with tamarisk and other non-native plants	Remove the non- native tamarisk.
2	Riparian Vegetation	13 (Area 'K') 6 (Area '8')	Riparian vegetation with non-native plants	Remove the non- native plants.
3	East Tributary	13	Riparian vegetation with non-native plants	Remove the non- native plants.
4	West - Water/Marsh Area (Created))	12	Rough graded; populated with non-native plants	Creation of 12 acres of water/marsh areas in the 9-hole proposed area.
RIPARIAN ACREAGE TOTAL		109		
5	Preserved Willow Pond	4	Intact.	N/A
6	Lakes (Existing)	19	Intact.	N/A
7	Wetland/Riparian Planting (Created)	12	Rough graded, populated with non-native plants.	To be created.
8	East – Water Marsh Area (Created)	3	Rough graded, populated with non-native plants.	To be created.
AQUATIC HABITAT TOTALS		147		

¹ The original 300-foot wide excavated channel has been widened to 550 feet where it turns west and has been fully vegetated. The entitlement to remove vegetation from the channel for flood conveyance purposes is neither valid any longer nor is it proposed by the applicant or the City.



U.S. DEPARTMENT OF TRANSPORTATION FEDERAL HIGHWAY ADMINISTRATION CALIFORNIA DIVISION 650 Capitol Mall, Suite 4-100 Sacramento, CA. 95814 March 2, 2006

> N REPLY REFER TO HDA-CA File #: 11-SD-00 El Camino Real Document #: P54022

Mr. Pedro Orso-Delgado, District Director California Department of Transportation District 11 P. O. Box 85406 San Diego, CA 92186-5406

Attention: Kevin Hovey, DLA NEPA Coordinator

MAR 0 6 RECTD

Dear Mr. Orso-Delgado:

SUBJECT: 11-SD-00 El Camino Real Bridge Widening project PES for the City of San Diego

Enclosed please find the original signed signature page and pages 6-31 through 6-43 for the subject project. Please note the change made to the statement pertaining to PM 2.5. Thank you for your assistance as we look forward to our continued discussions on this project.

If you have any questions, please contact Lisa Cathcart-Randall, Lead Transportation Specialist, at (916) 498-5048.

Sincerely, For

Gene K. Fong Division Administrator

Enclosure





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EXHIBIT 6-A PRELIMINARY ENVIRONMENTAL STUDIES (PES) FORM

PRELIMINARY ENVI	RONMEN	TA:	Ľ	ST	UDIES (PES) FORM
TO: (DLAE) Gary Vettese (District) 11 (Address) 2829 J. Strick	(Fede	ral P	rog	. Pi	OJECT NUMBER: refix-Proj. No., Agreement No.) הכץ (נוצ)
FROM: City of San Diego 1010 Second Avenue, Suite 1100, MS 611 San Diego, CA 92101 Abi Palaseyed 619-533-3756					N: Expected Start Date: 06/06
Is this project "ON" the State Highway System? Yes No IF YES, STOP HERE and contact the District DLAE		FSTIP: (Plan Date) Ine 30 th , 2002 is amended (Page #) 56			
		FY for which each Project Component is Programmed for delivery in the FSTIP:			
regarding the completion of other environmental documentation					FY <u>05/</u> FY <u>05/</u> FY <u>06/©7</u>
PROJECT DESCRIPTION AS SHOWN IN FSTI (Via de la Valle to San Diejvito Re	P: El Cur	رز مه رو کر	R l	دم م 1	I Road and Bridge Willening Velle connection Nead S El Coning Real
relieve traffic congestion, and improve consistency improvements include raising and widening El Cam higher, wider, and has deeper piles. <i>See continuation</i> PRELIMINARY DESIGN INFORMATION	nino Real roa at end of this	dway Exhi	ibil	nd : t.	replacing the bridge with a structure that is
Does the project involve any of the following? Please check the ap additional pertinent information Yes No	propriate boxes :	Yes			on an attached map, plan, or layout including any
Any vegetation removal				_	Railroad
Bridge work (If yes, discuss bridge type/approach	n work)		K]]	Ramp closure
Construct access roads Disposal/borrow site(s)		B	╞		Realignment
Disposal/borrow site(s) Drainage/culverts		日	╞		Removal of trees R/W acquisition (If yes, attach map/APN#'s)
Drainage/culverts Equipment staging Flooding			Ī		Road cut(s)
			K		Temporary road/Detour
Capacity Increasing Ground disturbance (outside of existing cut slope	and all work		X	_	Sound walls Stream channel work
outside the toe of fill)					
Material site(s)			Ę		Temporary easements
New alignment Off-pavement detour			╞		Utility relocation Widen existing roadway
Will increase number of through lanes		Ħ	k		Part of larger or adjacent project
REQUIRED ATTACHMENTS:					·····

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Exhibit 6-A, continued

EXAMINE FOR POTENTIAL EFFECTS ON THE ENVIRONMENT, DIRECT OR INDIRECT, AND ANSWER THE FOLLOWING QUESTIONS (Utilize the notes page at the end of the PES Form to document conclusions)

A. The Physical Environment	Yes	To Be <u>Determined</u>	<u>No</u>
 Is the project a Type I project as defined in 23 CFR 772.5(h) "construction on new location or the physical alteration of an existing highway, which significantly changes either the hor or vertical alignment or increases the number of through-traf lanes"? 	n izontal		
2. Are there water resources (rivers, streams, bays, inlets, lakes drainage sloughs) within or immediately adjacent to the proj area?			
3. Is project within a designated sole-source aquifer?			\boxtimes
4. Is project within the State Coastal Zone?	\boxtimes		
5. Is the construction area located within a regulatory floodway within the base floodplain (100-year) elevation of a watercou- lake?		, L	
 Is the project within or immediately adjacent to a Wild and S River System? 	Scenic		\boxtimes
7. Is there a potential for a federally listed, threatened, or endar species or their critical or sensitive habitat within the constru- area?			
8. Is there a potential for wetlands within the construction area	?		
9. Is there a potential for agricultural wetlands within the const area?	ruction		
 10. Air Quality a. Transportation Conformity (Air) Does Transportation Conformity apply? b. Is the project exempt from the requirement to determine conformity (40 CFR 93.126)? 			
11. Air Quality: Does the project have the potential for adverse emission impacts?		\boxtimes	
12. Is there a potential for prime or unique farmlands within or immediately adjacent to the construction area?	\boxtimes		
13. Is there a potential for hazardous materials (including undergatanks) or hazardous material remains within or immediately adjacent to the construction area?	ground	\boxtimes	
14. Are there any publicly owned public parks, recreation areas, wildlife or waterfowl refuges [Section 4(f)] within construct area?			
15. Are there any aesthetically visual resources within the project	ct area?		

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The So	cial and Economic Environment	Yes	To Be <u>Determined</u>	<u>No</u>
16.	Will the project require any right-of-way, including partial or full takes? Consider construction easements and utility relocations.	\boxtimes		
17.	Is the project inconsistent with plans and goals adopted by the community?			\boxtimes
18.	Will the project result in the need for public services, including utilities other than those presently available or proposed?			\boxtimes
19.	Will the project involve changes in access control?	\boxtimes		
20.	Will project involve the use of a temporary road, detour or ramp closure?			\boxtimes
21.	Will the project reduce available parking?		\boxtimes	
22.	Will the project require future construction to fully utilize the design capabilities included in the proposed project?			
23.	Will the project generate public controversy based on potential environmental effects?		\boxtimes	
24.	Will project construction encroach on State or federal Lands?	\boxtimes		
25.	Are there National Register listed or potentially eligible historic properties or archaeological resources [Section 106, Section 4(f)] NOTE: CT PQS DETERMINES APPLICABILITY OF QUESTION #25.		\boxtimes	
26.	Is there a potential for the introduction or spread of invasive species?			\boxtimes

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SECTION C, D & E - CHECK APPROPRIATE BOX TO INDICATE REQUIRED TECHNICAL STUDIES, COORDINATION, PERMITS OR APPROVALS

C.	REQUIRED TECHNICAL STUDIES	D.	COORDINATION	E.	PERMIT/APPROVALS
	NOISE STUDY _X_Traffic Related _X_Construction Related	_X_ _X_	FHWA FHWA		
	WATER QUALITY STUDY _X_Discharge Dredged/Fill material (US waters) _Construction in Navigable Waters _Construction of Bridges/Causeways Across Navigable Waters _X_Construction of Bridge	 X	U.S. Army Corps of Engineers U.S. Coast Guard California Regional Water Quality Control Board		Issues Section 404 Permit Section 10 Permit Approves Plans Water Quality Certification
	_X_Stream or Lake Alteration NEPA/404 MOU SOLE SOURCE AQUIFER	_^_	California Department of Fish & Game FHWA EPA (S.F. Regional Office)	_^_	Section 1601/03 Permit Contamination Threat
R			State Coastal Zone Management agency (California Coastal Commission (CCC))		Coastal Zone Consistency
	FLOODPLAIN STUDY * WILD & SCENIC RIVERS		Federal Emergency Management Agency FHWA U.S. Department of Interior Heritage Conservation/Recreation Service	_X_	Floodplain Finding
		$_X_{-}$	FHWA California Department of Fish & Game	_x_	Sec 7 Consultation Incidental Take Permit
\boxtimes	WETLANDS STUDY * Agricultural Wetlands	_x_ _x_	FHWA/EPA U.S. Fish & Wildlife U.S. Army Corps of Engineers National Marine Fisheries Service Natural Resources Conservation Service	_x_	Wetlands Findings Venfies juris, wetlands Venfies agri, wetlands
	AIR QUALITY STUDY*	_x_	FHWA	_x_	Conformity Finding
Ø	FARMLANDS STUDY	_x_	Natural Resources Conservation Service U.S. Army Corps of Engineers	_x_	Verifies prime/unique Approves Conversions
N	HAZARDOUS MATERIAL STUDY (Cleanup of Hazardous Material Sites)	_x_	 CALIF. EPA; Department of Toxic Substances Control, Biennial Reports, Lists of Active Annual Work plan Sites CALIF. Office of Planning and Research; Hazardous Wastes & Substances Sites List, List of Contaminated Sites LOCAL; Health & Human Services Dept., Hazardous Waste Operations Div 	,	

[•] FHWA has responsibility for consultation under regulation or interagency agreement or FHWA has responsibility for a finding or determination required by law, regulation or Executive Order.

C.	REQUIRED TECHNICAL STUDIES	Đ.	COORDINATION	E.	PERMIT/APPROVALS
\boxtimes	SECTION 4(f) EVALUATION *	_x_	FHWA	_x_	Makes Determination
		x	Public Official w/Jurisdictional Responsibility.		
			SHPO/ACHP (as appropriate)		
		x	DOI/DOA/HUD/USDA (as appropriate)		
⊠	SECTION 6(f) EVALUATION	_X_	Park Official		
		—	DOI		
⊠	VISUAL IMPACT STUDY (AESTHETICS)	_X_	FHWA		
đ	RELOCATION IMPACTS STUDY		State & Local Planning Departments		
	SOCIO-ECONOMIC STUDY		Airports, Schools, State and Local		<u></u>
		_	Planning Departments		
ً⊠	TRAFFIC	_X_	FHWA		
ً⊠	SECTION 106 STUDY *				
٦	Exempt Undertaking		Caltrans (PQS & DLAE approve APE)		Determines whether project qualifies as exempt
	_X_APE Map	_X_	Caltrans	_x_	Determines applicability of Minimal APE
	X Historic Property Survey Report (HPSR)	_x_	Caltrans Local Preservation groups and/or Native	_X_	Approves document Provides comment on
		X	American Tribes		concerns with project
		x	FHWA	_x_	Concurs or Consults with SHPO/ACHP
			SHPO	<u>X</u>	Concurs
Ø	CONSTRUCTION/ENCROACH ON STATE LANDS				
	_X_Under State Lands Commission Jurisdiction	_X_	State Lands Commission	_x_	General Permit/Revise General Plans
	Under Caltrans Jurisdiction	_	Caltrans	_X_	Encroachment Permit
	CONSTRUCTION/ENCROACHMENT		U.S. Bureau of Reclamation	_	Encroachment Permit
	ON FEDERAL LANDS	_	Private Land Owner	—	Right-of-Entry Permit
	Additional	studio	es may be required for other federal ag	encie	S.

F. Public Hearing and Public Availability

____ Not Required

- ____ Notices of Availability
- ____ Environmental Document ONLY

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<u>X</u> Opportunity for a Public Hearing <u>X</u> Public Hearing Required

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^{*} FHWA has responsibility for consultation under regulation or interagency agreement or FHWA has responsibility for a finding or determination required by law, regulation or Executive Order.

G. Preliminary Environmental Document Classification (NEPA)

Based on the evaluation of the project, the environmental document to be developed should be:

- _____ Environmental Impact Statement
- Environmental Assessment
- Categorical Exclusion, with required technical studies (involving federal action)
- Programmatic Categorical Exclusion, without required technical studies
- Programmatic Categorical Exclusion, with required technical studies (not involving federal action)

LOCAL AGENCY STAFF or CONSULTANT SIGNATURE

LOCAL AGENCY STAFF or CONSULTANT SIGNATURE
Prepared by: <u>A. Palasey</u> Date <u>2/8/06</u> Telephone #: <u>619-533</u> -3756
LOCAL AGENCY PROJECT ENGINEER SIGNATURE: This document was prepared under my supervision, in accordance with the Local Assistance Procedures Manual, Exhibit 6- B, "Instructions for Completing the Preliminary Environmental Study Form."
Signature local agency: <u>A. Palasey</u> Date: 2/8/06 Telephone #: 619-533-3756
THE FOLLOWING SIGNATURES ARE REQUIRED FOR ALL PCEs, REGULAR CEs, EAs, AND EISs
CALTRANS DISTRICT ENVIRONMENTAL OFFICE CHIEF (EOC) OR DESIGNEE SIGNATURE I have reviewed this Preliminary Environmental Study (PES) form and determined that the submittal is complete and sufficient. I concur with the studies to be performed and the recommended level of environmental document (if required). Signature EOC (or designee): Date: $2/4$ 0.6 Telephone #: $355-616-6653$
CALTRANS DISTRICT PROFESSIONALLY QUALIFIED STAFF (PQS) SIGNATURE Project does not meet definition of an "undertaking". No further review is necessary under Section 106. ("No" Sec B, #25) Project meets the definition of an "undertaking", involves the types of activities listed in Attachment 2 of the Section 106 PA, and, based on the information provided in the PES Form, does not have the potential to affect historic properties. ("No" Sec B, #25) Project meets the definition of an "undertaking" and involves the types of activities listed in Attachment 2 of the Section 106 PA, but the following additional procedures or information is meded, to determine the potential for effect: ("To Be Determined" Sec B, #25) Records Search The proposed undertaking to have the potential to affect historic properties. Further studies for 106 compliance are indicated in Sections OP and Potthis PES Form (Yer Sec B, #25) Signature PQS:
DLAE SIGNATURE: I have reviewed this Preliminary Environmental Study (PES) form and determined that the submittal is complete and sufficient. I concur with the studies to be performed and the recommended level of environmental document (if required). Signature DLAE: $2/24/06$ Telephone #: $058-616-6523$
THE FOLLOWING SIGNATURE IS REQUIRED FOR EAS, EISS, AND (WHEN RECOMMENDED BY THE EOC (or DESIGNEE), OR DLAE) FOR REGULAR CEs:
FHWA SIGNATURE: I concur with the studies to be performed and the recommended leyel of environmental document.
Signature FHWA: Date: <u>3./.06</u> Telephone #: <u>916.498.5</u> 048
Distribution: Original: District Local Assistance Engineer Copy: Local Agency Project Files, District EOC (or designee), District PQS

PRELIMINARY ENVIRONMENTAL INVESTIGATION NOTES TO SUPPORT THE CONCLUSIONS OF THIS CHECKLIST (May also include continuation of Detailed Project Description from Page.)

Continuation of Detailed Project Description

Scope of Work: All of the alternatives considered feasible and studied in detail involve these common elements:

- The roadway of El Camino Real would be raised above the 100-year flood level from San Dieguito Road to Via de la Valle.
- The bridge over the San Dieguito River would be replaced with a new structure that would be approximately the
 same length as the existing bridge, and raised above the 100-year flood level. The bridge would be supported on
 bridge piles that would be cast-in-drilled-hole construction, and would extend to a depth of approximately 27.4
 meters (90 feet) below the ground. Above the ground, the piles would become cylindrical finished concrete columns
 (piers).
- Via de la Valle would be widened to its ultimate width from the modified intersection with El Camino Real eastward to El Camino Real North. The drainage channel along the south edge of Via de la Valle would be relocated further south and enlarged to carry a 100-year flow from the upstream watershed. The corrugated metal pipe storm drain under Via de la Valle at El Camino Real North would be replaced with a concrete box sized to pass a 100-year flow from upstream.
- Project impacts to wetlands would be mitigated by enhancement and creation on the San Dieguito River Park JPA (former Boudreau) property west of the affected portion of El Camino Real.

Project Limits: The road being modified is El Camino Real from Via de la Valle on the north to San Dieguito Road on the south. This portion of El Camino Real, classified as a 2-lane collector, is approximately 2,400 feet long. This segment includes the 300-foot-long bridge over the San Dieguito River. Approximately 1,000 feet of Via de la Valle also would be widened to accommodate new turn lanes from El Camino Real, and a new, larger drainage ditch would be constructed along the southern edge of Via de la Valle, from existing El Camino Real to El Camino Real North.

Purpose and Need: The purposes of the proposed project are the following:

1) To provide structurally sound and operationally efficient access across the San Dieguito River during flood and non-flood events

- 2) To help achieve the goals of the SANDAG Regional Transportation Plan
- 3) To provide congestion relief in order to improve traffic flow
- 4) To obtain improved consistency with the applicable land use documents in the project area
- 5) To improve pedestrian and vehicular access to nearby coastal and recreational resources

The specific problems associated with the existing transportation facility involve several categories of needs. These are the following:

1) Capacity and transportation demand: The segment of El Camino Real proposed for widening currently operates at LOS F conditions. In the future year 2030, El Camino Real between Via de la Valle and San Dieguito Road is projected to carry 28,500 ADT, resulting in more severe congestion. The segment of Via de la Valle proposed for widening currently operates at LOS F conditions. In the future year 2030, Via de la Valle between El Camino Real and El Camino Real North is projected to carry 23,500 ADT, resulting in more severe congestion. If the El Camino Real and Via de la Valle road segments were widened to be 4-lane major roadways, they would operate at LOS C with the future projected traffic.

2) Roadway and bridge deficiencies: Based on the study of geotechnical and structural conditions conducted for this project (Ninyo & Moore 2005), the existing bridge is vulnerable to damage in a severe seismic event. The top 20 feet of the existing,

30-foot deep bridge piles are set in sediments that could liquefy in an earthquake. The geotechnical report concluded that the existing bridge foundation system may not be adequate to support the bridge service loads from traffic driving over it, and may not have an acceptable safety factor. Furthermore, the bridge abutment slopes could slide in a major earthquake. Hydraulic analyses to determine flood elevations in the river channel upstream and downstream of the bridge indicate that the 100-year water surface elevation would rise above the bottom of the bridge, but would not overtop the bridge deck. An existing buried rip rap layer installed to protect an adjacent sewer pipeline under the river protects the existing bridge foundation footings from scour. However, without the rip rap "blanket," potential scour could extend as deep as elevation 15 feet below msl. The project proposes to correct the bridge deficiency issues by replacing the structure completely.

3) Local land use plan and policy consistency: The Framework Plan designates El Camino Real as a four-lane Major Arterial with an LOS of B. However, El Camino Real is currently a two-lane collector operating at LOS F. Therefore, this project proposes modifications to improve compatibility with the approved planning documents for the area in terms of road classification and LOS.

4) Regional transportation plan consistency: The Regional Transit Vision includes goals such as making walking "more convenient, faster, and safer," and encouraging "more smoothly flowing automobile traffic." Currently, there are no sidewalks, no dedicated horse paths, and no designated bicycle lanes on the portion of El Camino Real addressed in this EIR. The bridge is narrow and provides no facilities for pedestrians. There are no controlled pedestrian or equestrian crossings. The project is proposed to improve consistency with the Regional Transit Vision by including pedestrian, equestrian, and bicycle elements.

Logical Termini and Independent Utility:

<u>Southern Terminus</u> - The southern terminus for the project is at San Dieguito Road. This location was selected for the following reasons: The design deficiencies the proposed project would correct are focused on the bridge over the San Dieguito River. If the bridge is raised higher to be above the 100-year flood level, the road to the south must be higher to line up vertically with the bridge. However, the higher road elevation could transition back to existing ground elevation at San Dieguito Road. El Camino Real south of San Dieguito Road is not in the 100-year floodplain, so there is no need to raise the road south of this point. Also, in terms of related projects, other entities are taking responsibility for widening the southern segment of El Camino Real from San Dieguito Road to the existing full width improvements north of Sea Country Lane, a distance of approximately 0.9 mile. The planned improvements for the portion of El Camino Real south of San Dieguito Road to the existing full width improvements north of San Dieguito Road include widening to four lanes, and providing bike lanes and a raised median. This portion of El Camino Real is addressed in a separate environmental document being prepared by others. Design and environmental documentation of the two segments are being closely coordinated.

Northern/Eastern Terminus - The northern/eastern terminus for the project is at the intersection of Via de la Valle and El Camino Real North. This location was selected for the following reasons: This is the northernmost extent of the portion of El Camino Real affected by the proposed change in elevation of the bridge. This is also the road segment that is currently operating at a congested traffic level of service (LOS F). The eastern end terminus for the project at the intersection of Via de la Valle and El Camino Real North was selected for the following reasons: City of San Diego design standards for transitioning from the modified intersection at the project portion of El Camino Real and Via de la Valle require widening eastward along Via de la Valle for a minimum of approximately 800 feet. To avoid impacts to developed property and drainage facilities on the northern edge of Via de la Valle, the widening is proposed to hold the north curb line and extend to the south. The existing drainage ditch parallel to the southern edge of Via de la Valle would be filled by this part of the project, and would have to be replaced adjacent to the widened road. Due to inadequacies in the existing hydraulic system, this ditch should be widened, and it is also proposed to vegetate the replacement ditch with brackish marsh. In order to place the new vegetated ditch in its permanent location, the transitional widening of Via de la Valle would be constructed at its ultimate width eastward for approximately 1,080 feet to El Camino Real North. In this way, the wetlands created in the new ditch would not be disturbed by the eventual plan to widen Via de la Valle to four lanes. Arrangement for right of way from the private property south of Via de la Valle would be most efficient and fair if the land ultimately needed is obtained at one time. Also, future, costly changes to the storm drain system would be avoided if the system components (box culvert under Via de la Valle and vegetated drainage ditch parallel to the road) were installed in their ultimate location.

NOTES TO SUPPORT THE CONCLUSIONS OF THIS CHECKLIST

1. This project proposes to add an additional through lane for each side of the roadway (to meet existing and 20-year projected traffic needs), along with other appurtenant improvements, including pedestrian walkways and bike lanes.

The existing bridge would be replaced with a seismically designed structure. El Camino Real is currently a two-lane rural roadway, and not a highway. The horizontal alignment will remain essentially the same. However, the vertical alignment will be raised to bring the bridge above the 100-year flood level, and for the roadway/bridge approaches to return to existing gradeline at the northern and southern ends (Via de la Valle and San Dieguito Road, respectively) in accordance with acceptable design standards. Meeting design standards for vertical curves will also enable the roadway to be above the 100-year flood level so the bridge is accessible in flood conditions.

- 2. The San Dieguito River flows under the bridge.
- 3. The site is in San Diego County, which has no Sole-source aquifers.
- 4. On the City of San Diego Coastal Development Permit Jurisdiction Map C-730.1 42 of 44, the Coastal Zone boundary within the project area is shown on the alignment of existing El Camino Real between Via de la Valle and San Dieguito Road. The Coastal Zone is west of the boundary line, and the Coastal Development Permit for project impacts within the Coastal Zone would be issued by the City of San Diego. The San Dieguito River corridor west of El Camino Real is indicated as being within Coastal Commission Appeal Jurisdiction on Map C-730.1 42 of 44.
- 5. The project study area is in the 100-year floodplain of the San Dieguito River. Floodplain mapping conducted for the Federal Emergency Management Agency (FEMA) in the mid 1980s was not fully accepted, and the floodplain is noted as approximate only on the floodplain maps.
- 6. The San Dieguito River is not classified as a Wild and Scenic River.
- 7. A joint letter was received from the USFWS and CDFG on December 12, 2002 presenting their concerns regarding the proposed project. Focused surveys and habitat assessments were conducted to address these concerns. The USFWS has indicated that the project area would include possible habitat for the federally-endangered light-footed clapper rail (*Rallus longirostris levipes*) and San Diego ambrosia (*Ambrosia pumila*). Habitat assessments were conducted for Quino checkerspot butterfly (*Euphydryas editha quino*), Pacific pocket mouse (*Perognathus longimembris pacificus*) and light-footed clapper rail. Focused surveys also were conducted for federally endangered arroyo toad and least Bell's vireo. Multiple pairs of clapper rail have been detected at and upstream of the bridge during surveys conducted in 2004 and 2005. In 2004, two least Bell's vireo territories were occupied in the project area. No suitable habitat and no occurrences were detected for San Diego ambrosia, Quino checkerspot butterfly, Pacific pocket mouse, arroyo toad, or southwestern willow flycatcher.
- 8. Based on biological resources surveys conducted in 1998 and 2003, and wetland delineations conducted in 1998 and 2004, the vegetation types occurring in the project area include southern willow scrub, disturbed southern willow scrub, disturbed mule-fat scrub, disturbed coastal brackish marsh, and disturbed southern coastal salt marsh. Wetland impacts, depending upon alternative, range between 4.36 acres and 4.57 acres.
- 9. Based on the biological resources surveys conducted previously, there is the potential for agricultural wetlands in the study area.
- 10. The proposed project is included in the 2030 RTP Technical Appendix 9, Table TA 9.1, line item 16 (SANDAG 2003a) and the 2004 RTIP Amendment No. 1, City of San Diego Section, MPO ID SD 34 (SANDAG 2004). The air quality analysis and conformity finding for the 2030 RTP was prepared by SANDAG (SANDAG 2003b), and the conformity finding was approved by the FHWA and FTA on April 9, 2003 (USDOT 2003). The air quality conformity determination for the 2004 RTIP Amendment No. 1 was approved by the USDOT on December 8, 2004 (FHWA 2004a). The design of the project is similar to that anticipated in the RTP and the RTIP.
- 11. The SDAB was redesignated as a CO attainment area subsequent to the passage of the 1990 Clean Air Act amendments. Continued attainment has been verified with the San Diego APCD. The project would not substantially increase traffic volumes or the percentage of vehicles operating in cold start mode, or increase the average delay at signalized intersections operating at level of service E or F. Potential release of PM 10 during construction is to be addressed in the Air Quality Study. The project will not require a P.M 2.5 hot spot analysis since it is in an attainment area.
- 12. The 2000 Important Farmland Map for San Diego County indicates that there is no Prime Farmland within the study area. However, project features and proposed mitigation for biological resources would affect Farmland of

Statewide Importance and Farmland of Local Importance. The only land being farmed in the study area as of 2004 is the property west of El Camino Real and south of the river. This area is classified as Farmland of Statewide Importance. Wetlands creation for mitigation purposes is proposed for this property, which has been purchased by the San Dieguito River Park JPA for eventual restoration to sensitive biological resources, including wetlands.

- 13. Federal, state and local environmental databases of reported hazardous waste sites for the project were reviewed to determine if any known sites are within the project area, and a report was provided by Environmental Data Resources, Inc. (EDR 2003). The databases were reviewed to evaluate the potential for subsurface soil and /or groundwater contamination to be present on the site from an unauthorized release of hazardous materials or wastes. None of the information retrieved indicates ongoing hazardous materials issues exist that could cause contamination of soil or groundwater that would interfere with construction of the proposed project components.
- 14. Three potential 4(f) resources in the project area: Del Mar Horse Park on the west side of El Camino Real, which is owned by the 22nd District Agricultural Association, a state agency; the Polo Club field on the east side of El Camino Real, which is on property owned by the City of San Diego; and the Fairbanks Ranch Country Club Golf Course, which is on property owned by the City of San Diego. Studies to be included in the EA indicate none of these properties qualify as 4(f) resources, however. Del Mar Horsepark is not protected by Section 4(f) because it functions primarily for commercial purposes rather than recreation and because visitation during its normal operating hours is permitted only to a select group of paying customers and not the entire public. Also, in terms of Section 4(f) applicability, the Del Mar Horsepark is rightly considered a fairground rather than a recreational facility. Similarly for the Polo Club fields, although they are publicly owned, the entire public is not permitted visitation at any time. Use of the polo fields is restricted to the playing membership, who must pay for the use, and therefore represent a select group. Also, the public must pay to view the recreational activities that occur onsite. Therefore, the provisions of Section 4(f) are not triggered for the Polo Club property. Use of the Fairbanks Ranch Country Club Golf Course is restricted to members, who are a select group. The golf course has set daily operation times when members are allowed to play. Also, the golf course does not play a critical role in meeting park, recreational, or refuge objectives of the City of San Diego, the responsible entity, since it is one of many golf courses in the City limits, and is privately operated with use restricted to members only. Therefore, the provisions of Section 4(f) are not triggered for the Fairbanks Ranch Country Club Golf Course property.
- 15. The project area is a visually attractive rural area. Visual impact studies will be conducted during the environmental documentation process.
- 16. Partial takes along the frontage of El Camino Real would be needed from several properties. The properties affected differ with the various alternatives considered feasible and studied in detail in the environmental document.
- 17. The affected portion of El Camino Real is in the northwestern part of the North City Future Urbanizing Area (NCFUA), a diverse planning area that extends from I-5 on the west to I-15 on the east, and from Los Penasquitos Canyon on the south to Santa Fe Valley on the north. The NCFUA Framework Plan (City of San Diego 1995) was initially adopted by the City Council in 1992 as an amendment to the General Plan. The Framework Plan designates El Camino Real as a four-lane Major Arterial with an LOS of B. However, El Camino Real is currently a two-lane collector operating at LOS F. Therefore, this project proposes modifications to improve compatibility with the approved planning documents for the area in terms of road classification and LOS. El Camino Real is identified in the City of San Diego General Plan Transportation Element.
- 18. The project will not generate the need for additional public services, although some utilities may need to be relocated, depending on the alternative selected.
- 19. The project would not impact access to a highway system. However, access to businesses along the roadway, including Mary's Tack and Feed, Del Mar Horse Park, and the Polo Club field would be affected by the change in vertical alignment and the road widening.
- 20. The project would not change local traffic patterns in the short or long term. The basic concept of construction of the raised and widened road and bridge is to huild one side or the other completely, without closing the existing road or bridge, then routing traffic to the new two-lane facility to allow demolition of the existing bridge and construction of the new adjacent two-lane facility. All of the alternatives are considered constructible without closing this segment of El Camino Real and requiring detours. One alternative located east of the existing El Camino Real alignment would offer the ability to construct the entire bridge and the four-lane roadway north of the bridge to Via

EXHIBIT 6-A Preliminary Environmental Studies (PES) Form

de la Valle completely separately from existing El Camino Real, and therefore, without the construction phasing required for the other alternatives. South of the bridge, the new road for this alternative would be constructed in phases, with the eastern half constructed first, unconstrained by existing El Camino Real. Then traffic would be moved to the new eastern half, and the western half of the new road would be constructed.

- 21. No parking is allowed on El Camino Real or Via de la Valle in the project area. Parking spaces in the lots north of Via de la Valle would not be affected by any of the alternatives. Spaces in the upper lot of Mary's Tack and Feed, and in the veterinary hospital parking lot would not be affected by any of the alternatives. Parking in the lower parking lot of Mary's Tack and Feed, which is not striped for parking, could be reduced by as much as an estimated 5 spaces, based on 8.5 feet width for parking spaces in a length of approximately 40 feet, depending on the alternative. Parking in the dirt lot at Horsepark would be affected only by one alternative that would extend approximately 70 feet into usable parking area on the dirt lot parallel to El Camino Real. In the affected area, one row of parking spaces approximately 600 feet long (south from the entrance to the river) would be eliminated by the widened road and slope. Assuming 8.5-foot wide parking spaces, approximately 70 parking spaces on Horsepark would be eliminated by this alternative. This number of spaces would represent approximately 17 percent of the estimated 420 available spaces in the parking area. To the extent that occasional parking occurs on the privately owned vacant property south of Via de la Valle and east of El Camino Real, this parking would be reduced along the western edge of the property for various road alignment alternatives, and along the northern edge of this property due to the widening of Via de la Valle, and construction of a new, wider drainage channel parallel to Via de la Valle. However, there is no master plan for this site to indicate where and when parking occurs on this property.
- 22. The road widening has independent utility and would not need future construction to improve road capacity, bridge safety, and flood protection along the portion of El Camino Real addressed by this project.
- 23. Public controversy may be raised over this project due to potential environmental effects and particular properties affected by the selected alignment alternative. Federal, state, and local guidelines for soliciting and incorporating public comment and input will be followed. Public input was sought during the initial project development and alternatives analysis.
- 24. The project may encroach on land owned by the 22nd District Agricultural Association, a state agency, depending on the selected alignment alternative.
- 25. Specific archaeological and historical studies have been conducted of the entire study area, to determine the presence of National Register listed or potentially eligible historic properties. No important archaeological resources were located within the project APE. A portion of site CA-SDI-686 Locus C was identified by the record search as within the cultural resources study area but the locus has been destroyed and was not relocated within the project APE. The potential for buried and undiscovered archaeological resources does exist within the APE, which is essentially made up of Holocene alluvium. Archaeological monitoring and Native American monitoring is recommended during earth moving activities associated with the project in order to identify buried cultural resources that may be uncovered during construction. Pursuant to the Caltrans/SHPO/FHWA Memorandum of Understanding for the evaluation of post-1950 buildings and pre-1950 buildings, all buildings and structures within the APE were inspected and photographed during the field survey. None of the buildings less than 50 years old reveals any exceptional importance necessary to meet the National Register's criteria considerations. The property located at El Camino Real and San Dieguito Road contains three buildings older than 50 years and later buildings that were moved on the property, in addition to buildings of a recent date that were constructed on site. An early 1910s Craftsman farmhouse meets the criteria for significance under CEQA. However, the road-widening project would not affect this historic resource. Project impacts would be more than 900 feet away from this building and would not affect the qualities of this structure or integrity of setting that makes it a significant historical resource under CEQA. There are no resources associated with the Mexican rancho period, nor with 19th century settlement or agriculture. Loss of farm groves and land to post World War II and recent development precludes any continued association with that theme, and there are no remaining structures associated with early railroad development.

The El Camino Real Bridge crossing San Dieguito River in the APE, was classified as Category 5 in the Caltrans Historic Bridge Inventory. The structure has been evaluated for significance twice, most recently in 1998. It was found not to be significant and in accordance with existing policy does not require reevaluation at this time.

26. The project would involve re-vegetation of areas disturbed during construction, and creation/enhancement of wetlands for mitigation of permanent impacts. Use of invasive plants, or any non-native landscaping/planting as

part of the project would be prohibited. Impacts to sensitive wetland habitats would be mitigated by: 1) creating habitat of equal value in the vicinity of the project; 2) enhancing degraded wetland habitats in the project vicinity through the removal of exotic plant species; and, 3) restoring wetland areas impacted during construction to their pre-project condition. Mitigation for impacts to sensitive upland habitats, i.e., coastal sage scrub, will be mitigated through contribution to the City's Habitat Acquisition Fund. Brackish marsh creation includes perennial herbaceous species established from container stock. The dominant species include a mixture of traditional fresh and salt marsh species including pickleweed (Salicornia virginica), alkali heath (Frankenia salina), saltgrass (Distichlis spicata), spiny rush (Juncus acutus), southern cattail (Typha domingensis), bulrush (Scirpus maritimus) and California bulrush (Scirpus californicus). Riparian scrub, composed of mule-fat/southern willow scrub habitat will be planted with mule-fat (Baccharis salicifolia), willow species (Salix spp.) and selected understory elements. Additional shrub and grass species are proposed for the riparian scrub areas to provide diversity and food sources for wildlife. These include San Diego marsh elder (Iva hayesiana), giant wild rye (Elymus condensatus) and California rose (Rosa californica). Several species will be planted in the revegetation site from seed, including western ragweed (Ambrosia psylostachya), Douglas mugwort (Artemisia douglasiana), Palmer's sage wort (Artemisia palmeri), creeping wild rye (Leymus triticoides) and great marsh evening-primrose (Oenothera hookeri). The plant palette for the creation of high salt marsh is similar to that for brackish marsh, with the exception of Scirpus and Juncus species. The intent of this mitigation component is to create non-tidal high salt marsh that is self-sufficient and of higher quality than that impacted by the project.

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MEMORANDUM

To: KEVIN HOVEY Senior Environmental Planner Environmental / Local Assistance Date: April 10, 2006

File: El Camino Real Bridge #57C-0042, San Diego City

From: MARTIN D. ROSEN

Senior Environmental Planner/PQS-P.I. Prehistoric Archaeology

Subject: Completion of Section 106 and Filing of Historic Property Survey Report (HPSR)

Attached is the HPSR for this undertaking. Since the City is using federal funding for the project, cultural resource studies had to comply with the requirements of Section 106 of the National Historic Preservation Act, and its regulations, as promulgated in 36CFR§800, and as specifically handled in accordance with the stipulations of the Section 106 Programmatic Agreement (PA), which became effective January 1, 2004.

The City of San Diego proposes to widen El Camino Real between Via de la Valle and San Dieguito Road and either widen or replace the existing El Camino Real Bridge (#57C-0042). City of San Diego contracted environmental studies to Earth Tech, Hon Consulting, and Tierra Environmental Services; Tierra was subcontracted to handle the cultural resource studies, and they subcontracted with Mooney · Jones & Stokes to do the historic architectural study. I prepared the Historic Property Survey Report (HPSR), based on information collected and synthesized by Tierra; Tierra prepared the Archaeological Survey Report (ASR) and Late Discovery Plan; and Mooney · Jones & Stokes prepared the Historical Resource Evaluation Report (HRER). All cultural resource documents were prepared under my oversight. The HRER was reviewed and approved with revisions, which have been incorporated into the final attached document, by Caltrans Principal Architectural Historian Andrew Hope. Due to Area of Potential Effects (APE) changes, the HRER ultimately became superfluous; but it is included because of the valuable information it contains on resources that are now located outside the project's APE. One nearby property, the Barnett House, appears to be eligible to the National Register of Historic Places; but because it no longer occurs near the APE, no concurrence from the State Historic Preservation Officer (SHPO) is being sought at this time.

Because there are no cultural resources within the APE, and because no concurrence on any historic property determination is being sought from the SHPO, the Section 106 finding for this undertaking is No Historic Properties Affected. The attached HPSR was prepared in accordance with *PA* stipulation IX.A(2). In accordance with the same stipulation, the document does not need to be reviewed by the SHPO or the Federal Highway Administration (FHWA). With this document, Section 106 responsibilities have been satisfied; the effective date being March 27, 2006, when the document was finalized by myself and reviewed by Kevin Hovey. No further cultural resource studies or evaluations will be required unless there are changes to the APE. If there are any questions or comments regarding the above or the attached, please do not hesitate to contact me (858.616.6615, mrosen@dot.ca.gov).

C: KCrafts/D-11 Cult Res. Files JHupp/HQ/CCSO SCIC/SDSU ATomera/D-11 DLAE w/o Attachment



United States Department of the Interior

FISH AND WILDLIFE SERVICE Ecological Services Carlsbad Fish and Wildlife Office 6010 Hidden Valley Road Carlsbad, California 92009



In Reply Refer To: FWS-SDG-3236.2

JUN 1 1 2003

Mr. Chris Norby Principal Biologist Tierra Environmental Services 9903 Businesspark Ave., Ste. E San Diego California 92131-1120

Re: Request for Candidate, Proposed, Threatened, or Endangered Species List for the Proposed El Camino Real Road and Bridge Widening Project, San Diego County, California

Dear Mr. Norby:

The U.S. Fish and Wildlife Service (Service) has reviewed the information provided in your May 1, 2003, letter to assess the potential presence of federally listed threatened, endangered, or proposed species at the proposed project site. We do not have site specific information for your project area. However, to assist you in evaluating whether or not the proposed project may affect listed species, we are providing the attached list of species that occur in the general project area. We recommend that you seek assistance from a biologist familiar with your project site, and with the listed species to assess the potential for direct, indirect, and cumulative effects likely to result from the proposed activity. You should also contact the California Department of Fish and Game for State-listed and sensitive species that may occur in the area of the proposed project. Please note that State-listed species are protected under the provisions of the California Endangered Species Act.

If it is determined that the proposed project may affect a listed or proposed species, or the designation of any critical habitat you should initiate consultation (or conference for proposed species) with the Service pursuant to section 7 of the Endangered Species Act of 1973, as amended (Act). Informal consultation may be used to exchange information and resolve conflicts with respect to listed species prior to a written request for formal consultation.

Should you have any questions regarding the species listed or your responsibilities under the Act, please call John DiGregoria of my staff at (760) 431-9440.

Sincerely,

Ru (mn Canange Peter C. Sorensen Acting Assistant Field Supervisor

Enclosure

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Listed Endangered, Threatened and Proposed Species that may occur in the vicinity of the El Camino Real Bridge at the San Dieguito River in San Diego County, California

Common Name	Scientific Name	Status
BIRDS light-footed clapper rail	Rallus longirostris levipes	E
<u>PLANTS</u> San Diego ambrosia	Ambrosia pumila	Е

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khon@honconsultinginc.com

From:	<john_digregoria@r1.fws.gov></john_digregoria@r1.fws.gov>
To:	<tierraenv@aol.com></tierraenv@aol.com>
Sent:	Wednesday, October 13, 2004 3:51 PM
Subject:	Re: El Camino Real

Chris,

Based on your July 23, 2002 survey report and current conditions, there is no need to conduct further arroyo toad surveys for the El Camino Real Bridge project at the San Dieguito River.

John DiGregoria Fish and Wildlife Biologist Carlsbad Fish and Wildlife Office 6010 Hidden Valley Road Carlsbad, California 92009 760 431-9440 fax 431-5901 John DiGregoria@r1.fws.goy

TierraEnv@aol.comTo:John_Digregoria@fws.gov10/13/2004 10:11cc:AMSubject: El Camino Real

John: The City of San Diego has asked me to contact you regarding arroyo toad at the El Camino Real Bridge project site. Several years ago, Jessie Delaya insisted that I do protocol surveys for the toad even though it was my opinion that there was no appropriate breeding habitat. Given the current situation with brackish conditions and clapper rails, do you agree? Can you please e-mail me regarding the need to do updated surveys for this species?

Thanks

Chris

Chris Nordby Principal Biologist



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Scott Peters San Diego City Council

Lesa Heebner Solana Beach City Council

Dr. Philip Pryde Citizens Advisory Committee

Kelly Burt, Ex Officio 22nd District Agricultural Assoc

Dick Bobertz Executive Director San Dieguito River Valley Regional Open Space Park 18372 Sycamore Creek Road Escondido, CA 92025 (858) 674-2270 Fax (858) 674-2280 www.sdrp.org

April 17, 2006

Richard Leja, Senior Civil Engineer City of San Diego Transportation Engineering Division, Engineering and Capital Projects 1010 Second Avenue, Suite 1200 San Diego, CA 92101

Dear Richard:

SUBJECT: El Camino Real Bridge Replacement

The City staff/consultant team that is working on the El Camino Real Bridge Replacement project has proposed an alternative that would not demolish the existing El Camino Real bridge when the new structure is constructed, but would keep it in place for use as a public trail for hikers, bicyclists and equestrians. The San Dieguito River Park Joint Powers Authority (JPA) staff was asked if we support this concept and would we be willing to assume responsibility for it when it becomes a trail. After discussing the concept with our Trails Committee, I am pleased to inform you that we do believe that the bridge would serve well as a multi-use trail, and that it would enable trail users who are south of the San Dieguito River to cross the river and join the Coast to Crest Trail.

One issue that was raised as a concern is the existing railing. We believe that the height and spacing of the railing would not meet current codes for a trail railing for pedestrians, bicyclists or equestrians. In addition, the railing appears to be in a poor condition that would need considerable maintenance. We have been informed by one of your consultants that the City is considering retaining the existing railing and adding a 42-inch high chain link fence. A chain link fence would not be an aesthetically acceptable railing for trail users or for drivers on the new bridge to view. We would like to work with you and your consultants to find an aesthetic, safe and economic solution to the railing issue.

The JPA staff would be willing to work with the City to pursue an agreement for the JPA to accept ownership and maintenance responsibility of the existing El Camino Real Bridge if it is preserved as a multi-use trail, provided that the railing is replaced or repaired to meet standards as noted above. Formal acceptance would require JPA Board action.

Sincerely, Dick Probertz, Dick Bobertz,

Executive Director

cc:

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Abi Palasayed, Transportation Engineering Div., City of San Diego Katherine Hon, Hon Consulting



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Kelly Burt, Ex Officio 22nd District Agricultural Assoc.

Dick Bobertz Executive Director Regional Open Space Park 18372 Sycamore Creek Road Escondido, CA 92025 (858) 674-2270 Fax (858) 674-2280 www.sdrp.org

San Dieguito River Valley

April 17, 2006

Richard Leja, Senior Civil Engineer City of San Diego Transportation Engineering Division, Engineering and Capital Projects 1010 Second Avenue, Suite 1200 San Diego, CA 92101

Dear Richard:

SUBJECT: El Camino Real Bridge Mitigation

The City staff/consultant team that is working on the El Camino Real Bridge Replacement project has proposed to use the adjacent Boudreau floodplain property as a mitigation site for wetland impacts associated with the El Camino Real Bridge Replacement project. The Boudreau property is now owned by the San Dieguito River Park Joint Powers Authority (JPA).

We would be pleased to have the City create wetlands on the former Boudreau property, as that is the intended use of the site. In fact, the San Dieguito River Valley Conservancy prepared a conceptual restoration plan for the site. I understand that your consultant, Chris Nordby, who was also the biologist who prepared that conceptual restoration plan, has been retained by the City to prepare a mitigation plan for the City on the former Boudreau property. I also understand that the City's mitigation needs do not exactly match the conceptual restoration plan design, and that you and Mr. Nordby are exploring alternative designs that would provide the City with the mitigation habitat and acreage that you need.

I propose that the City and the JPA enter into a Memorandum of Agreement that contains the following terms:

- The JPA will not require payment from the City for the use of the property.
- The City will include in its plan and will create when it creates its own mitigation acreage, three acres of salt marsh that is a JPA mitigation requirement for the Coast to Crest Trail and Wetland Treatment Ponds in the San Dieguito Lagoon.
- The City will be responsible for maintaining and monitoring the restoration site for the first five years or until the project meets its success criteria.

• At the time the project is approved, the City will provide a non-wasting endowment to the JPA that will provide income to enable the JPA to manage the restored wetlands after the City's project meets its success criteria. The amount of the endowment depends on the degree of surveying, reporting or long-term maintenance is required by the Resources Agency

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If you are interested in pursuing the use of the former Boudreau property for your mitigation needs, please contact me so that we can proceed with the preparation of the MOA.

Sincerely, Dick Bobertz.

Executive Director

cc:

Abi Palasayed, Transportation Engineering Div., City of San Diego Katherine Hon, Hon Consulting

CITY OF SAN DIEGO EL CAMINO REAL ROAD/BRIDGE PROJECT MEETING SUMMARY JULY 14, 2004

ATTENDEES						
NAME	AFFILIATION	PHONE	E-MAIL			
John DiGregoria	USFWS	760-431-9440	John_Digregoria@fws.gov			
Stephanie Hall	USACOE Regulatory	213-452-3410	shall@spl.usace.army.mil			
Bob Hoffman	NOAA Fisheries	562-980-4043	Bob.hoffman@noaa.gov			
Larry Vinzant	FHWA	telecon	Larry.vinzant@fhwa.dot.gov			
Liz Varnhagen	EPA	telecon	Varnhagen.liz@epa.gov			
Elizabeth Goldmann	EPA	telecon	Goldmann.elizabeth@epa.gov			
Libby Lucas	CDFG	858-467-4230	elucas@dfg.ca.gov			
Tamara Spear	CDFG	858-467-4223	tspear@dfg.ca.gov			
Tim Dillingham	CDFG	858-467-4204	tdilling@dfg.ca.gov			
Sherilyn Sarb	Coastal Commission	619-767-2370	ssarb@coastal.ca.gov			
Ellen Lirley	Coastal Commission	619-767-2370	elirley@coastal.ca.gov			
Mike Porter	SD RWQCB	858-467-2726	portm@rb9.swrcb.ca.gov			
Jason A. Reynolds	Caltrans – Env.	858-616-6609	Jason.a.reynolds@dot.ca.gov			
Bruce April	Caltrans – Env.	858-616-6614	Bruce.april@dot.ca.gov			
Gladys Baird	Caltrans – Env.	858-616-6632	Gladys.t.baird@dot.ca.gov			
Sue Scatolini	Caltrans – Env.	858-616-6640	Susan.scatolini@dot.ca.gov			
David Nagy	Caltrans – Env.	858-616-6650	David.l.nagy@dot.ca.gov			
Anthony Tomera	Caltrans Local Assist.	858-616-6531	Anthony_Tomera@dot.ca.gov			
Richard Leja	City of San Diego	619-533-3764	rleja@sandiego.gov			
Abi Palaseyed	City of San Diego	619-533-3756	apalaseyed@sandiego.gov			
Mark Weis	City of San Diego	619-533-3791	mweis@sandiego.gov			
Kerry Santoro	City of San Diego	619-533-3749	ksantoro@sandiego.gov			
Donna Clark	City of San Diego	619-446-5387	declark@sandiego.gov			
Chris Nordby	Tierra Environmental	858-578-9064	Tierraenv@aol.com			
Katherine Hon	Hon Consulting Inc.	619-294-8990	khon@honconsultinginc.com			
Chris Knopp	PDC	619-881-3390	chrisk@projectdesign.com			

DISCUSSION SUMMARY

1. Hydraulic effects of river widening are crucial in the decision of whether or not this is a desirable project feature. Potential changes in flow characteristics upstream and downstream, and in the 2-year, 10-year, and 100-year flow are all of concern and need to be understood by the agencies before they can give an opinion about river widening. They also would like to know if hydraulics vary with the different river widening concepts (South Only, North Only, and North & South). How does the flow regime change with removal of the bottleneck at the bridge?

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- 2. All the agencies would appreciate an explanation by Dr. Howard Chang, who has conducted extensive hydraulic modeling for the San Dieguito Lagoon Wetlands Restoration Project. They would like to have a letter report from Dr. Chang a week in advance of the next meeting, and have a presentation by Dr. Chang at the next meeting.
- 3. Effects on groundwater of river widening are also of concern and an important factor. Would a wider river reduce groundwater flow downstream in low-flow conditions because there would be more infiltration upstream? If there is increased infiltration, where would that water re-surface?
- 4. Impacts of the road/bridge project must be evaluated in the context of the potential impacts on the San Dieguito Lagoon Wetlands Restoration Project. The issue of how river widening could affect the clapper rail habitat also is important, since it is documented that there are at least 6 pair in the river at/upstream of the bridge. The effects could be beneficial or detrimental, depending on how the river hydraulics are affected.
- 5. If there is a benefit to the JPA/SCE project, benefit to river hydraulics, and benefit to clapper rail habitat, USFWS would not be opposed to the river widening concept.
- 6. Mitigation areas within the watershed are desirable. There may be mitigation land available in a potential mitigation bank created as part of the San Dieguito Lagoon Wetlands Restoration Project, and/or there may be suitable land within the lagoon project area that is not currently planned for wetlands development.
- 7. The additional wetlands impacts indicated in Table 1 of the June 17 letter as caused by river widening are conservative. With proper construction restrictions and design, edge effects may be reduced to be near zero.
- 8. The agencies agreed that **permanent** impacts are where valued vegetation is dug up and/or filled in, even if replacement vegetation is planted nearby. Therefore, the impacts to the drainage ditches would be considered permanent.
- 9. Although disturbance from activities in construction easements is often considered a temporary impact, there is a temporal consideration, according to USFWS. If the duration of construction is lengthy, impacts in a construction easement may be considered permanent. In the case of El Camino Real, the river in the project area encompasses inhabited clapper rail habitat, and the construction time would be extensive (estimated as at least 18 months), so construction easements probably would be considered permanent impacts.
- 10. The Corps of Engineers generally only counts permanent impacts when they determine if a project is or is not in the NEPA/404 Integration Process. The

threshold for being in the NEPA/404 process is 5 acres or more of permanent wetlands impacts.

- 11. EPA generally combines both permanent and temporary impacts when counting acreage for determining if a project is in the NEPA/404 Integration Process. What qualifies as "temporary impacts" has not been well defined.
- 12. In the case of the City's El Camino Real project, the total of temporary and permanent wetlands impacts is estimated as roughly 4 acres without river widening. If river widening is not incorporated, or if it could be accomplished with minimal wetlands impacts, the project would not be in the NEPA/404 Integration Process. However, all participants expressed the desire to continue to work together toward creating the best project possible and facilitating future permitting efforts, even if the project does not end up in the formal NEPA/404 Integration Process.
- 13. Wetland vegetation is underneath the bridge. A wider bridge could be considered to fragment the clapper rail habitat.
- 14. Potential mitigation sites must be identified now, and their impact on river hydraulics must be modeled.
- 15. The priority is to avoid wetlands impacts.
- 16. The Coastal Commission has many of the same concerns as the other agencies, including avoiding impacts to wetlands, and differentiating between permanent and temporary impacts of the project. The mitigation ratio they typically use for permanent impacts of the kind that would occur for the City's El Camino Real project is 4:1. There needs to be a demonstrated improvement in fish and wildlife habitat for a project component to be permissible.
- 17. For the Coastal Commission, widening the road (and bridge) to provide 4 travel lanes is increasing capacity, and this may not be an acceptable incidental public purpose when there are wetlands impacts. It was noted that currently, peak hour traffic is at Level of Service F. The offsets included in the project must be defined. A separate meeting will be needed with Coastal Commission to discuss their specific issues.
- 18. Caltrans noted that the project alternatives discussed in detail in the EIR/EA will have to satisfy the project purpose and need. Narrow footprint road cross-sections that would not improve traffic level of service or public safety would not satisfy the purpose and need.
- 19. The purpose and need was summarized in the June 17 letter.

- 20. The focus of FHWA is on the bridge. Lengthening the bridge by 100 feet to accommodate river widening adds roughly \$4 million to the project estimated construction cost.
- 21. The JPA and Lagoon project team members should be invited to the next meeting. Bruce McIntyre with PDC should be consulted for input on who should be invited.
- 22. MSCP staff from the City should be invited to the process. Clapper rail management directives will be needed for the project.

NOTE: These minutes are the preparer's understanding of the items discussed at the meeting. If discrepancies are noted, please contact the preparer within three days of receipt.

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DISTRIBUTION:	Attendees
DATE:	July 28, 2004

CITY OF SAN DIEGO EL CAMINO REAL ROAD/BRIDGE PROJECT AGENCY COORDINATION MEETING SUMMARY SEPTEMBER 7, 2004

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DISCUSSION SUMMARY

- 1. Based on recent hydraulic analyses, the City finds that the river would not need to be widened substantially upstream and downstream and the bridge would not need to be lengthened 100 feet in order to achieve no net rise in 100-year water surface elevations upstream. The river widening as has been proposed is now not considered necessary to meet the project purpose and need. However, the City does not want to remove a prominent feature from the alternatives studied in detail in the EIR without consulting with the agencies.
- 2. Dr. Chang presented highlights from his hydrologic study, which focused on potential effects of the four river widening concepts on the downstream San Dieguito Lagoon Wetlands Restoration Project ("Edison/JPA project" herein), in response to questions from the agencies at the July 14, 2004 meeting. All agency contacts received an electronic copy of this brief report. The handout provided at the meeting presented two of the color graphics from the presentation, a diagram of the proposed Edison/JPA project, and an aerial photo of flooding in 1980 (35-year flood) from the beach east to El Camino Real. Dr. Chang's presentation included the following points:
 - The existing roadway is subject to overtopping in the 100-year flood.
 - Hydraulics in the river system are controlled by downstream conditions; therefore, changes in the floodplain at El Camino Real would only affect flood

levels upstream. Flood levels on the Edison/JPA project, which is downstream, would not be affected by El Camino Real.

- Effects of river widening on groundwater would likely not be significant because the widening would increase groundwater recharge area within the widened channel during low flow, but decrease groundwater recharge area upstream during low flow, and decrease groundwater recharge from inundated areas during relatively brief flood conditions.
- River widening would represent a removal of sediment from the watershed, so
 in the long term, there could be less beach sand supply resulting from river
 widening. This would not impact the JPA project because of the design of
 that project, but potentially could have an impact long-term on beach supply
 and/or foundation scour of downstream bridges/roads.
- River widening would increase sediment deposition in the widened area during low flow because velocity would be less. This could be adverse for wetlands created in the river. Also, downstream flows would contain less sediment, and scour potential in the downstream river channel could increase.
- The tidal basins that would be created by the Edison/JPA project would be protected from changes in the river conditions by berms.
- Certain changes to the bridge abutments under the proposed new bridge would be needed to avoid a net rise in upstream 100-year water surface elevations, but the extensive river widening and lengthening of the bridge would not be needed. These limited changes will be defined and analyzed in the EIR.
- 3. The clapper rails at and adjacent to the existing El Camino Real bridge are a major issue. The wetted area upstream of the bridge could decrease with a substantially widened river. CDFG is very concerned that the existing habitat, which is successfully supporting a dense population of the federal- and state-endangered bird, could diminish over time if conditions were drier in the river bed. Upstream conditions with the project implemented must be addressed thoroughly in the EIR. Clapper rail habitat that is impacted must be replaced per MSCP guidelines with clapper rail habitat, and not other habitat types.
- 4. Because the potential wetlands impacts from river widening were estimated very conservatively, USFWS and Caltrans believe total impacts to wetlands would be less than 5 acres even with river widening, and the project will not fall under the formal NEPA/404 Integration Process. In any event, the conclusion to not consider river widening/bridge lengthening as a variation on the alternatives means there will be no formal NEPA/404 Integration Process. However, the City will continue to have periodic joint agency coordination meetings, and will meet about specific issues with various agencies as the environmental process continues.
- 5. The extent, depth, and quality of groundwater are important factors in successfully creating wetlands. Groundwater infiltrates into the river bed and into the ponds on the golf course south of the river. Groundwater total dissolved solids (TDS) content is roughly 17,000 mg/l, or brackish water. Brackish marsh would be the most likely wetlands type to develop naturally and be sustainable.

- 6. Potential mitigation site locations for El Camino Real include 1) the Boudreau property south of the river and west of El Camino Real, which was recently purchased by the JPA; 2) City-owned Polo Fields north of the river and east of El Camino Real; 3) a privately-owned (Hu Family Trust) vacant property south of Via de la Valle and east of El Camino Real, which currently is mapped with substantial acreage of salt marsh although it is often used as a parking lot; and 4) approximately 16 acres controlled by Southern California Edison west of Horsepark's western boundary and north of the river.
- 7. The agencies agreed the private parcel adjacent to Via de la Valle is too far north of the river for creation of a beneficial clapper rail habitat. An off-river location such as the Polo Field, set apart from the river by berms, may require connection to the river via culverts set high enough to avoid collecting sediment, unless groundwater can sustain the wetlands. Silts and clays can significantly harm wetlands, and this would be an issue for in-river mitigation.
- 8. The JPA would prefer that mitigation planning for El Camino Real focus on either the former Boudreau property, as their goal is to develop habitat restoration in this area, or on the 16-acre site for which Southern Edison developed a mitigation plan, but which it does not need to create. The JPA is open to including the types of wetlands needed for El Camino Real mitigation in the draft restoration plan developed for the former Boudreau property, which currently emphasizes a non-tidal design.
- 9. Alternative D, which is further to the east than the other alternatives, would allow the bridge and road north of the bridge to be constructed without phasing. This would avoid the need to build a two-lane bridge and road to one side of existing El Camino Real, then shift traffic to the new segment, demolish the existing bridge, and build the other half, a process that would be required for all of the other alignment alternatives. The eastern alignment alternative could be built in roughly half the time of the phased alternatives, and would create substantially less temporal impacts in the river during construction. This would help with impact avoidance and minimization, which are important to the CDFG and others. It is possible that single columns rather than pairs of columns could be appropriate for the eastern alignment bridge, which would cause less temporary and permanent impacts in the river than the other alignments. For the eastern alignment alternative, the old bridge would be demolished, but the timing would be more flexible because there would not be any traffic on it once the new facility is completed. The agencies requested that details on the timing and duration of construction for each alignment alternative be provided in the EIR. CDFG wants construction work in the river done outside the breeding/nesting season of March - mid-August.
- 10. JPA wants to see the EIR address cumulative effects, including the I-5 widening and other projects mentioned during the discussion.
- 11. At the end of the meeting, all agencies concurred that the substantial river widening and bridge lengthening concept could be addressed in the EIR as a concept that was considered but rejected, and not included as a feature of the road/bridge alignment alternatives addressed in detail. Agency comments are highlighted as follows.

- USFWS: Even if the choice were made to create wetlands in the river, the mitigation could be accomplished without widening the river under the new bridge, and requiring a substantially longer bridge. The EIR must document how the not substantially lengthened bridge would avoid increasing flow rate and velocity downstream of the bridge, since more flow in the 100-year event would be forced under the bridge due to the road embankments north of the bridge. Mitigation location(s) and concepts are the next issue to address, as well as potential impacts to the clapper rail. Wants to explore widening the river in areas outside of the bridge location to create mitigation.
- CDFG: The document does not need to address river widening as a variation of alternatives analyzed in detail in the EIR. Any upstream changes that could affect the clapper rail would be of concern. Mitigation development must focus on creating habitat that is of the type and in a location that would be beneficial to the clapper rail. Locations that are distant from the river would not be desirable to CDFG for effective clapper rail habitat mitigation. Salt marsh must be mitigated with salt marsh.
- FHWA: Putting public money to the best use is an important consideration. Could the money needed to create the wider river and longer bridge be applied more effectively elsewhere or saved?
- Corps of Engineers: Substantially lengthening the bridge is not an essential project feature.
- Coastal Commission: The current direction of minimizing wetlands impacts by not widening the river and lengthening the bridge substantially is acceptable. Discussions between the City and the Coastal Commission regarding increasing the road capacity to four lanes are ongoing, because Coastal Commission is concerned about widening the bridge/roadway when wetlands are impacted.
- San Diego Regional Water Quality Control Board: The current direction of the group is acceptable. The eastern alignment alternative that would allow the bridge to be built all at once and not phased in two construction stages would reduce temporal impacts of construction in the river, which is a favorable aspect of that alternative.
- City of San Diego Environmental: For CEQA, the alternatives are driven by what is needed to meet the project purpose and need. Because the substantial river widening variations would not be needed to accomplish the project, and because they complicate the EIR, the City would prefer to not include substantial river widening and bridge lengthening as part of the detailed alternatives.

JPA: The JPA would prefer to not have substantial river widening included in the alternatives for El Camino Real because of uncertainties in long-term beach sand supply, which was an extremely sensitive issue for the San Dieguito Lagoon Wetland Restoration Project. Cumulative impacts on the river system, particularly on the overall health and function of the river, should be addressed in the EIR.

NOTE: These minutes are the preparer's understanding of the items discussed at the meeting. If discrepancies are noted, please contact the preparer within five working days of receipt.

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Subject: El Camino Real Initial Mitigation Site Planning

Hello Permitting Agencies and Interested Parties - Based on guidance from the Permitting Agencies at the September 7, 2004 El Camino Real Multi-Agency Coordination Meeting, the project team has been evaluating potential mitigation sites for wetlands creation. The attached Word file summarizes the results of two planning meetings, at which a City and consultant team developed mitigation planning guidelines, identified six feasible sites, agreed upon seven key site evaluation criteria, selected a site evaluation methodology, and conducted the evaluation on the six sites. The two tables at the end of the meeting summary present the evaluation "scoring" process and the results. The attached pdf file is a map illustrating the location of the six sites evaluated.

Based on this process, which by this e-mail we are presenting to the Permitting Agencies for comment, the former Boudreau site (now owned by the JPA- Site #2)) is ranked highest (most preferable for mitigation), the Southem California Edison parcel (Site #4) is ranked second, and the Polo Club fields (Site #1) and a City-owned property (Site (#3) are tied at third.

In view of everyone's busy schedule, the project mitigation planning team is sending this e-mail for review and comment by the permitting agencies (and interested parties). We would be pleased to arrange a Multi-Agency coordination meeting to discuss this very important issue, if requested. Please route any comments, questions, or requests to me. We are particularly interested in the opinions of the permitting agencies on our site planning process and results. It is crucial to the progress of El Camino Real that we hear from each of our permitting agencies no later than November 30. Please reply with your concurrence, questions, or concerns as soon as reasonably possible.

Thank you for your attention to this matter, which is crucial for progress on the El Camino Real project.

Best regards,

Katherine

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CITY OF SAN DIEGO EL CAMINO REAL ROAD/BRIDGE PROJECT MITIGATION PLANNING MEETING #2 SUMMARY OCTOBER 28, 2004

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DISCUSSION SUMMARY

The purpose of the meeting was to reach consensus within the project team on the mitigation sites and evaluation process, and to use the selected process to rank the feasible mitigation sites. Results of the meeting are summarized below.

1. MITIGATION GUIDELINES

- a. The group agreed on the following guidelines for our mitigation planning.
 - The focus of mitigation is on wetlands creation.
 - The habitat type is brackish/salt marsh primarily to benefit clapper rail.
 - It is preferable to accomplish all needed wetlands mitigation on one site.
 - It is preferable to accomplish all needed wetlands mitigation in the Coastal Zone.

2. IDENTIFICATION OF FEASIBLE SITES

At Mitigation Planning Meeting #1 on October 7, 2004, the group developed the following Site Identification Criteria as essential characteristics of any site considered for mitigation:

- The site is within City of San Diego city boundaries.
- The site is within the *lower* San Dieguito River watershed.
- It would be feasible to create brackish marsh on the site.
- For mitigating impacts that occur in the San Dieguito River, it would be feasible to create habitat for the clapper rail on the site.
- The site does not currently have a use that would prohibit developing biological resources mitigation on it.
- The site would not require continual maintenance that would affect wetlands.
- The site is available to be considered for use as biological resources mitigation.
- For mitigating impacts that are within the Coastal Zone (west of the eastern edge of El Camino Real right-of way), the site is within the Coastal Zone.

At Mitigation Planning Meeting #1 on October 7, 2004, the group identified six feasible sites for wetlands mitigation to be evaluated. The group confirmed today there are no additional feasible sites. The San Pasqual Valley is not considered feasible because brackish marsh could not be created there. For this reason, the group modified the second Site Identification Criterion to be the *lower* San Dieguito River watershed.

The group verified the following sites will be evaluated:

- 1. Polo Club fields (north of river, east of El Camino Real)
- 2. Former Boudreau property, now owned by San Dieguito River Park JPA (about 70 acres south of river, west of El Camino Real)
- 3. City's San Dieguito Lagoon Mitigation Area (about 16 acres south of river, west of El Camino Real, fewer than 2 acres used by MWWD for mitigation)
- 4. SCE Property in San Dieguito Lagoon Wetland Restoration Project area (about 20 acres north of river, west of El Camino Real)
- 5. Hu Property (about 15 acres north of river, east of El Camino Real
- 6. City's Eastern Polo Club area (about 30 acres north of river, east of El Camino Real)

Regarding Site #2, Katherine noted that informal communication with the JPA indicates they intend to "market" the land for restoration mitigation only. The land cannot be sold as mitigation because it has already been purchased for open space preservation using a grant. However, the grant money did not include the cost to restore the property. It is likely that the JPA would actually do the mitigation if the participating agency would prefer that.

Regarding Site #3, Madison noted it does not appear that MWWD has specific ownership. He will verify that the property is under general City ownership. Norm noted the Lagoon Wetlands Restoration Plan would bring a branch of the river close to this area.

Regarding Site #4, Chris noted that Southern California Edison has verified this site is available for another entity to pay to implement the restoration plan. SCE would not do the restoration unless they have funding from another entity, as they do not need this acreage to accomplish their mitigation requirements.

3. SITE EVALUATION CRITERIA

- a. The group agreed with the following guidelines:
 - If we can't measure the criterion, it isn't useful.
 - If the criterion doesn't differentiate the sites, it isn't useful.
- b. Of the preliminary evaluation criteria the group identified at Mitigation Planning Meeting #1, the group agreed some should be deleted and some new ones should be added, as follows:
 - Ownership (retain)
 - Cost (delete; difficult to measure at this time due to federal limitations on negotiations)
 - Impacts on existing infrastructure (delete; does not differentiate)
 - Impacts on existing biological resources (retain)
 - Impacts on other projects (add: "plans, or existing uses")
 - Ability to connect to the San Dieguito River (retain)
 - Ability to enhance existing biological resources for mitigation credit (delete; not meaningful since focus is on wetlands creation)
 - Suitable zoning (delete; does not differentiate)
 - Designated for restoration (new)
 - Proximity of site to project impacts to clapper rail (new)
 - Location of site in relation to Coastal Zone (new)

4. SITE EVALUATION METHODOLOGY

- a. The group agreed to develop an objective evaluation methodology rather than a comparative methodology (meaning we will have an absolute "performance scoring" process, rather than compare the sites to each other).
- b. The group agreed to assign points for characteristics/criteria in accordance with a simple 1-2-3 scale, with the high score being most favorable.

The definitions developed for performance scoring of the selected evaluation criteria are listed in Table 1. The results of the site evaluation with the process are in Table 2.

With this process, the JPA (former Boudreau) site is ranked highest, the SCE site is second, and the Polo Field and City Lagoon site are tied at third. We propose to investigate the feasibility of an arrangement with the JPA, with the SCE site as an alternative.

5. NEXT STEPS AND ACTION ITEMS

The group decided the next steps should be as follows:

- 1. Provide a summary of the mitigation planning to the agencies, and ask if they want to meet, or if they concur based on their review of the summary. *Action: Katherine Hon*
- 2. Request a meeting with the JPA to discuss the feasibility of a mitigation agreement. *Action: Abi Palaseyed*
- 3. Investigate the City's ownership of Site #3. Action: Real Estate Assets

NOTE: These minutes are the preparer's understanding of the items discussed at the meeting. If discrepancies are noted, please contact the preparer within five working days of receipt.

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DISTRIBUTION:	Attendees and Interested Parties
DATE:	October 29, 2004
DISTRIBUTION	Permitting Agencies and Interested Parties
DATE:	November 15, 2004

TABLE 1 PERFORMANCE SCORING DEFINITIONS

Ownership

- 3 = Owned by City of San Diego
- 2 =Owned by a cooperative entity
- 1 = Other ownership

Impacts on Existing Biological Resources

- 3 = No impacts on sensitive biological resources
- 2 = Minimal impacts on existing biological resources
- 1 = Implementing mitigation would add to project wetlands impacts

Impacts on Other Projects/Plans/Existing Uses

- 3 = No impacts
- 2 = Mitigable impacts
- 1 = Would substantially interfere with other projects, plans, or uses of the site

Ability to Connect to the San Dieguito River

- 3 = Easily connected without changing river hydraulics
- 2 = Feasible to connect to San Dieguito River
- 1 = Difficult to connect to San Dieguito River, or could change river hydraulics

Designated for Restoration

- 3 = Site is already designated for wetlands restoration/creation
- 2 = Site is available for designation as a restoration area
- 1 = Site is not likely to be designated for restoration

Proximity of Site to Project Impacts to Clapper Rail

- 3 = Site is adjacent to clapper rail impact area
- 2 = Site is within $\frac{1}{2}$ mile from clapper rail impact area
- 1 = Site is more than $\frac{1}{2}$ mile from clapper rail impact area

Location of Site in Relation to Coastal Zone

- 3 = Site is entirely within the Coastal Zone
- 2 = Site is partially within the Coastal Zone
- 1 = Site is not within the Coastal Zone

TABLE 2MITIGATION SITE EVALUATION PROCESS RESULTS

SITE	1 City's Polo Field	2 JPA (former Boudreau)	3 City's Lagoon Site	4 SCE Lagoon Site	5 Hu Parcel	6 City's Eastern Polo Field
CRITERIA						
Ownership	3	2	3	2	1	3
Biological Impacts	3	3	3	3	1	3
Project/Plan/Use Impacts	1	3	1	3	1	2
Ability to Connect to River	3	3	2	3	1	3
Restoration Designation	1	3	2	3	1	1
Proximity to Clapper Rail Impact Area	3	3	1	1	2	1
Location in Coastal Zone	1	3	3	3	1	1
TOTAL SCORE	15	20	15	18	8	14
RANKING OF SCORE	3 rd (tie)	1 st	3 rd (tie)	2 nd	5 th	4 th

.



CITY OF SAN DIEGO EL CAMINO REAL ROAD/BRIDGE PROJECT AGENCY COORDINATION MEETING SUMMARY FEBRUARY 28, 2005

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Chang										
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Goldman	}	1								
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Cesar Perez	FHWA	Yes (phone)								
Mike Porter	San Diego	Yes	858-467-2726	portm@rb9.swrcb.ca.gov						
	Regional Water									
	Quality Control									
 	Board		l							

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DISCUSSION SUMMARY

- 1. The objectives of the meeting were to obtain input and subsequent written concurrence from the permitting agencies on the following: proposed mitigation ratios, and the preferred mitigation site.
- 2. Detailed impacts on sensitive biological resources based on planning level GIS estimates were provided in the background information e-mailed February 24, 2005. A summary of wetland impacts handed out at the meeting is included in these notes as Table 1. Acreage differences among alternatives in terms of impacts in the river relate to assumptions about construction easements, and the planning level of the mapping. There will be more accuracy in the impact areas when detailed final design is prepared. However, the impact to disturbed coastal brackish marsh in the river is similar for the three alternatives presented: more than 0.5 acre and less than 1 acre.

TABLE 1 CITY OF SAN DIEGO EL CAMINO REAL ROAD/BRIDGE PROJECT WETLANDS IMPACT/MITIGATION SUMMARY (acres)

		lignment & Elevation	Western Alignment Easte			n Alignment	
Vegetation Type	Impacts	Proposed Mitigation	Impacts	Proposed Mitigation	Impacts	Proposed Mitigation	
Riparian Scrub	0.66	1.98	0.53	1.59	0.86	2.58	
DCBM with Clapper Rail	0.86	3.44	0.63	2.52	0.77	3.08	
DCBM without Clapper Rail	2.19	8.76	1.81	7.24	2.19	8.76	
Salt Marsh	0.65	2.6	0.39	1.56	0.75	3.0	
TOTAL	4.36	16.78	3.36	12.91	4.57	17.42	

DCBM = Disturbed Coastal Brackish Marsh

3. Proposed mitigation ratios were discussed in the background information, summarized in the meeting agenda, and are repeated below.

Riparian Scrub – 3:1 overall 1:1 on-site restoration/off-site creation

2:1 enhancement

Coastal Wetlands - 4:1 overall

- 4:1 creation for clapper rail habitat
- 1:1 creation plus 3:1 enhancement for non-clapper rail habitat

Coastal Sage Scrub 1:1 contribution to City's Habitat Acquisition Fund

These ratios were developed by the Project Biologist (Chris Nordby with Tierra Environmental Services) as a synthesis of the CDFG and other agency guidance (1:1 for no net loss) and the City's Environmentally Sensitive Lands guidance (4:1 for coastal wetlands).

- 4. The agencies agreed no-net-loss is typically required, and the proposed 1:1 creation (or restoration where appropriate) meets this requirement. The Corps stated the proposed ratios are adequate. USFWS noted they will defer to the Corps on the issue of mitigation ratios. The Regional Board noted the 1:1 ratio is acceptable, and the 4:1 ratio is more than adequate for Regional Board's needs. CDFG stated that the 1600 representative, who was not in attendance, would have to review the proposed ratios. The attending CDFG representative said CDFG typically requires no net loss (or 1:1), and the proposed 4:1 ratio is higher than they typically see. However, the presence of clapper rail in the river is a special circumstance that must be considered.
- 5. USFWS stated that due to the temporal nature of the impacts, "temporary" impacts should be considered permanent and mitigated as such.
- 6. The required timing for accomplishment of mitigation was discussed. NOAA noted that mitigation needs to be accomplished before construction occurs. The mitigation must be functionally equivalent to what is lost. Caltrans and the City noted the proposed ratios incorporate an assumption that mitigation would be installed concurrently with the construction project, and having the wetlands creation in place a year before the proposed construction start time of September 2007 is not possible. The mitigation must be included in the environmental and permitting processes for entire project. The earliest the CEQA/NEPA process can be expected to be completed is the beginning of 2006, and permits would probably require another 6 months after that. CDFG noted ratios can decrease if mitigation is in place before the actual disturbance.
- 7. Construction timing and duration were discussed. A handout presenting construction activities and timing for two basic types of bridges is included in these meeting notes as Table 2. The single-stage bridge applies to the Eastern Alignment only, which is separated from the existing bridge and road to the north. All other alignment alternatives would require a multiple-stage bridge as only half could be built at a time.
- 8. As Table 2 indicates, no construction in the river is proposed during the breeding season. USFWS noted then there shouldn't be take of clapper rail, but there will be a temporary loss of habitat. Biological monitoring will be required during construction.
- 9. The City's preferred mitigation site is the former Boudreau site (tomato fields west of El Camino Real), now owned by the San Dieguito River Park JPA. The JPA noted they support the City's proposal to implement mitigation on this site. The City would not have to pay for the use of the land, but the JPA would have to be reimbursed for maintenance. The City's El Camino Real project would have to include CEQA/NEPA clearance for the mitigation on the site, and would have to obtain the needed permits.

TABLE 2 CITY OF SAN DIEGO EL CAMINO REAL ROAD/BRIDGE PROJECT CONSTRUCTION DURATION SUMMARY

Construction/Breeding Season	Single-Stage Bridge Construction Activity	Multiple-Stage Bridge Construction Activity
	(Eastern Alignment only)	(All other alternatives)
Construction Period #1	Construct bridge	Construct substructure and
Sept. 2007-Feb. 2008	substructure (piles & columns)	falsework for half of bridge
Breeding Season #1 Feb. 2008-Sept. 2008	No Construction	Construct Via de la Valle and half of El Camino Real where possible
Construction Period #2 Sept. 2008-Feb. 2009	Construct bridge superstructure (falsework, soffit, deck)	Complete superstructure and surface for half of bridge, complete half of El Camino Real; transition traffic, demolish existing bridge
Breeding Season #2 Feb. 2009-Sept. 2009	Construct along Via de la Valle	No Construction
Construction Period #3 Sept. 2009-Feb. 2010	Install bridge surface features (sidewalk, barrier, handrail); construct El Camino Real; transition traffic; demolish existing bridge at any acceptable time in the future	Construct substructure and falsework for other half of bridge
Breeding Season #3 Feb. 2010-Sept. 2010		Begin construction of other half of El Camino Real where possible
Construction Period #4 Sept. 2010-Feb. 2011		Complete superstructure and surface for other half of bridge, complete other half of El Camino Real; transition traffic
TOTAL CONSTRUCTION DURATION	~2.5 years	~3.5 years
BREEDING SEASONS SPANNED	Two	Three

- 10. Dr. Chang noted that a hydraulic connection to the river to feed the wetlands created on JPA's "Boudreau" site would have to be very carefully designed, but it would be possible to accomplish the connection without having an adverse effect on river flow and sediment flow.
- 11. The agencies agreed the JPA "Boudreau" site is a suitable location for mitigation.
- 12. CDFG noted they would prefer mitigation be accomplished on the Polo Club fields, as this location, being east of the bridge, is closer to the currently occupied clapper rail habitat in the river. Also, CDFG research indicates the area of the Polo Club fields was supposed to be restored in the past, and the JPA's "Boudreau" site is already committed to eventual restoration.
- 13. The City noted that the current lease with the Polo Club expires in 2012, and removing up to 16 acres for mitigation related to the El Camino Real Bridge project could generate the need to compensate the lessee or replace the lost acreage for the Polo Club perhaps by acquiring the Hu property to the north, filling that land and amending the lease to include the replacement area. The City's environmental consultant emphasized including such a proposal in the EIR/EA would substantially increase the wetlands impacts to salt marsh, and drive the environmental process into NEPA/404. The project biologist noted clapper rail are under the bridge, and probably originally came from downstream, so the birds could move west to the JPA "Boudreau" site.
- 14. FHWA suggested a matrix be prepared to compare the two mitigation sites, and this information distributed via e-mail to see if a consensus can be reached. The City and CDFG should investigate previous Streambed Alteration Agreements to determine if all commitments have been met.
- 15. A comparison summary will be prepared, and a meeting date will be arranged for the end of March. If consensus is reached on the mitigation site, the next topic for agreement will be the preferred alignment.

NOTE: These minutes are the preparer's understanding of the items discussed at the meeting. If discrepancies are noted, please contact the preparer within five working days of receipt.

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March 16, 2005

CITY OF SAN DIEGO EL CAMINO REAL ROAD/BRIDGE PROJECT AGENCY COORDINATION MEETING SUMMARY APRIL 4, 2005

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DISCUSSION SUMMARY

- 1. The objective of the meeting was to follow up on questions and concerns communicated by the permitting agencies on the City's preferred mitigation site, which is the former Boudreau site purchased by the JPA (herein referred to as the "JPA site").
- 2. Clarifications to the February 28, 2005 agency coordination meeting notes and additional comments were received from CDFG and the USFWS, as summarized below.

Libby Lucas with CDFG stated in a March 2, 2005 e-mail that CDFG generally agrees with the proposed mitigation ratios. However, she requested clarification on the definition of "restoration," stating that for CDFG "to consider whether restoration alone or a restoration/creation mix would meet the no-net loss requirement, we would need to know the details of the proposal." She also noted that if the term "coastal wetlands" includes the clapper rail habitat to the east of the bridge, "the proposed 4:1 creation for the loss of clapper rail habitat will be acceptable to DFG, as will be the 1:1 creation plus 3:1 enhancement (i.e., removal for non-native invasive species from the riparian area)."

In a subsequent letter to the City e-mailed on March 24, 2005, CDFG made the following additional comment on the February 28, 2005 meeting notes: "The minutes correctly reflect that CDFG indicated that the proposed 4:1 mitigation is higher that we usually see for the loss of coastal wetlands. What I meant to say is that 4:1 <u>creation</u> is higher than we usually see. City of San Diego requires 4:1 for coastal wetlands, but does not specify that it all be creation. As we have said in a previous e-mail, we agree with the 4:1 creation for the loss of habitat that supports the clapper rail." This letter also posed additional questions regarding the Polo Club fields as a mitigation site. These questions were the focus of the April 4, 2005 meeting.

John DiGregoria with USFWS stated the following in a March 23, 2005 e-mail: "A couple of notes from your minutes. The Service stated that there will likely be no direct injury or kill from construction equipment. However, the permanent removal of occupied habitat will constitute "take" from harm (loss of occupied habitat) and we will need to go through formal consultation with the project. The Service also supports the CDFG position regarding the Polo Fields and any outstanding issues regarding the Polo Fields needs to be closed before we move forward with this project."

- 3. The feasibility of the alternative alignments that affect the western edge of the Polo Club Fields leasehold was discussed. The alternatives for the road are feasible because the lease specifically allows the City to build a road and to have other utility easements over and across the property. However, taking land for mitigation is not specifically allowed in the lease, so this action would have to be negotiated separately. The lease is for 26 years. It started in 1986 and runs to the end of 2012. The lease does not include language regarding implementing mitigation on the property referenced in the 1981 Fairbanks Country Club EIR prepared for Watt Industries, the property owner at the time. A Corporation Grant Deed transferred the property to the City on October 24, 1983. The City noted that mitigation never being implemented on the Polo Club fields for the 1981 project is a code enforcement issue, and the City will investigate this issue. It was agreed by CDFG that mitigation for El Camino Real and mitigation for the 1981 Fairbanks Country Club project are two different issues. CDFG also concurred that if the road is in the lease, then the road alignments affecting the property are feasible.
- 4. Potential actions by Polo Club if part of the property were taken for the road and for mitigation were discussed. Caltrans emphasized that it is speculation to predict any actions on the lessee's part, and the environmental document will not speculate. City Real Estate Assets stated that with only 7 years left on the lease, it is not likely that the lessee would go to the expense of obtaining the private property to the north in order to continue operations.
- 5. Demolition of the existing bridge was discussed. CDFG suggested leaving the pier walls of the existing bridge in place if the Eastern Alignment Alternative, with the completely separate new bridge, is selected. The hydraulic effects of the existing bridge and other components of the river system in this location, including the rip rap blanket and existing bridge abutments, must be analyzed. USFWS noted the rip rap blanket has helped establish the emergent marsh, which is attractive to the clapper rail. The hydraulic

analysis must determine if steepening the abutments as proposed would be detrimental to the hydraulic system that supports the clapper rail. The project description must include how and when the existing bridge would be demolished. CDFG noted that we must balance river functionality with the clapper rail requirements.

6. The biological suitability of the JPA site and the Polo Club site for clapper rail mitigation was discussed. The project biologist read the following from a government annotated bibliography about clapper rail written by Dick Zembal, former USFWS expert:

"The light-footed clapper rail is non-migratory. Once established on a territory, the birds stay throughout the year and from year to year.

Local wandering, however, has been documented, with sightings of rails in winter, sometimes far inland. Whittier Narrows, 32 km from the coast, and Walnut Canyon Reservoir (Nohl Ranch Lake), 23 km from the coast, are the farthest inland sites documented thus far. The most probable explanation for winter dispersal is that young birds must seek their own territories, once the family unit breaks up at the end of breeding season."

- 7. Coastal Commission policy regarding mitigation for impacts in the Coastal Zone was discussed. The City's Local Coastal Program requires impacts in the Coastal Zone to be mitigated in the Coastal Zone. However, the Coastal Commission noted that state coastal requirements would be the review standard in the project area, not the City's Local Coastal Program. The Coastal Commission said that if there is biological benefit to mitigating outside of the Coastal Zone, they would consider such a plan.
- 8. Potential impacts to the JPA trail that is currently on the north bank of the river were discussed. If mitigation were on the Polo Club site, allowance for at least a 100-foot buffer would have to be made in addition to the width of the mitigation area. JPA noted moving the trail as far north as the property line between the private property and the Polo Club field property could be a problem for their Coast to Crest trail alignment. However, they do not have a set trail alignment east of the bridge, because they must still address how to go through the Morgan Run area.
- 9. Potential legal issues associated with implementing mitigation on the Polo Club site were discussed. Caltrans noted that they generally cannot condemn for mitigation land, and they must prove necessity. In this case, since the JPA site is also considered feasible, it would be difficult to prove necessity for using the Polo Club site.
- 10. USFWS and CDFG concluded that neither agency has the authority to require the City to select a particular mitigation site if several are adequate. If it can be demonstrated that emergent marsh can be established on the JPA site, then that site is acceptable for mitigation for El Camino Real Road/Bridge Project. Hydrologic feasibility is related to the depth of groundwater on the site, and the ability to connect to the river without affecting river hydraulics.

11. The City will pursue having borings drilled on the JPA site to determine the existing groundwater level. The City will have Dr. Chang develop and analyze a river connection. The City will also have Dr. Chang evaluate the hydraulic conditions that would occur if the existing bridge were left in place and a new bridge built to the east. Results of the feasibility and hydraulics analysis will be reported in future e-mail correspondence.

NOTE: These minutes are the preparer's understanding of the items discussed at the meeting. If discrepancies are noted, please contact the preparer within five working days of receipt.

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CITY OF SAN DIEGO EL CAMINO REAL ROAD/BRIDGE PROJECT AGENCY COORDINATION MEETING SUMMARY OCTOBER 25, 2005

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Larry Vinzant	FHWA		Larry.Vinzant@fhwa.dot.gov
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The purpose of the meeting was to show available locations for wetlands creation and enhancement, and present the basic concepts of the wetlands mitigation plan for the project on the JPA (former Boudreau) property. The acreages of impact and mitigation needs presented reflect those of the Eastern Alignment, which is the City's Preferred

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Alternative. The mitigation acreages proposed are a conservative estimate that would cover any of the alternatives.

The meeting discussion is summarized below.

DISCUSSION SUMMARY

- 1. **Preferred Mitigation Site**. The JPA (former Boudreau) property lies west of El Camino Real in the Coastal Zone. This property was selected by the City as the preferred mitigation site after a multiple-site, group-process evaluation, as discussed with the agencies in meetings on February 28, 2005 and April 4, 2005.
- 2. Utility Corridor. The JPA property is split diagonally by a 150-foot wide utility corridor running southeast to northwest between El Camino Real and Via de la Valle. The utility corridor is controlled by SDG&E. High voltage steel transmission towers are in the utility corridor above ground, and three pipelines are in the utility corridor below ground. The pipelines carry fuel and high-pressure gas. The pipelines are at shallow depths (top of pipes at 4 to 9.5 feet below the ground). Therefore, culverts cannot be buried in the utility corridor to hydraulically connect the east and west sides of the JPA property. After developing concepts for each side and analyzing these hydraulically, the City has selected the east side of the utility corridor for the mitigation plan. This will place the created brackish marsh as close as possible to the clapper rails east of El Camino Real.
- 3. **Topography and Groundwater Levels.** Based on borings drilled on the JPA site by Ninyo & Moore on June 13, 2005, the groundwater levels east of the utility corridor vary from approximately 3 to 6 feet below the existing ground surface. Based on topographic mapping, the existing agricultural fields are at elevations of 12 to 14 feet above mean sea level (msl). Therefore, the groundwater table is at an elevation of about 8 feet msl. The river bed elevation is about 3 to 5 feet msl. High tide up the San Dieguito River is at a maximum elevation of approximately 4 feet msl. Tidal influence on the mitigation site is not likely.
- 4. **Flooding Issues**. The JPA property is in the 100-year floodplain of the San Dieguito River. The 100-year flood elevation in this area is approximately 19 feet msl, or 5 to 7 feet above the existing ground surface of the agricultural fields. Based on historic flooding patterns of the San Dieguito River along the JPA site, if brackish marsh is planted in an area that is lowered about 3 to 6 feet to be close enough to groundwater to be sustainable, the area will be subject to damage from high floods. In greater than about the 10- to 15-year flood, high-velocity water carrying sediment would overtop the river banks and pour into the lowered wetlands area. The sediment would deposit in the depression, and erosion would occur from the fast flowing water.

- 5. **Protective Vegetated Berm.** In order to protect the planted wetlands from flood and sediment damage, a vegetated berm is proposed to be constructed parallel to the river along the edge of the area lowered to create brackish marsh. The berm would have a side slope of 2.5:1 on the river side and would rise 10 feet above the existing ground surface to provide 100-year flood protection of the created wetlands. The vegetated berm would be set back from the south bank of the river along the effective flow line, but would be within the 100-year floodplain. Without the berm, the lowered mitigation area would capture sediment during high flows, which would bury the planted brackish marsh and reduce sand supply to the beach downstream. JPA noted this is why the San Dieguito Lagoon Wetlands Restoration Project also has berms along the river. Their project was in litigation for 2 years over the beach sand supply issue.
- 6. **Inflow Weir.** A weir (lowered notch) about 250 feet long would be constructed in the eastern edge of the berm to divert a portion of high river flows into the created brackish marsh. The weir would be protected by open stabilization material such as Armorflex, which would be planted with site-appropriate vegetation. Water flowing over the weir would enter the created wetlands in a controlled fashion that would prevent erosion and sedimentation. Some of the high river flows must be allowed into the created wetlands so that upstream 100year water surface elevations would not be increased by the vegetated berm in the floodplain.
- 7. Low Flow Culverts. Pipes would be installed through the protective vegetated berm to allow low river flows to enter the created brackish marsh. The culverts would allow flow exchanges between the river and the created brackish marsh. The bottom of the culverts would be set at an elevation of 6 feet msl, (slightly above the river bottom to prevent sediment from entering the created brackish marsh) and would allow slowly moving water to enter the area. Slowly moving water is desirable for the clapper rail.
- 8. Outflow Weir. During high flow events, flow entering the created brackish marsh through the inflow weir would exit to the west over the utility corridor. The ground surface of the utility corridor would need scour protection, which would be developed in coordination with SDG&E.
- 9. **Impacts.** The impacts of the Eastern Alignment Alternative, the mitigation ratios, and the mitigation required were presented in the table sent in advance of the meeting.
- 10. Available Mitigation Areas and the Proposed Mitigation Concept. The graphic sent in advance of the meeting showed where enhancement and creation would be possible. The following discussion occurred regarding the graphic:
 - The graphic shows the mitigation potential for El Camino Real without incorporating JPA's needs.

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- The 22nd Ag District owns the area of the river where the 0.68 acre of brackish marsh enhancement potential is shown, and where the 0.38 acre of mule fat/southern willow scrub enhancement potential is shown. The 0.24 acre of potential riparian enhancement on the east side of the bridge may not be a viable area for enhancement for the Eastern Alignment because of future shading by the bridge. These areas are not included in the mitigation concept.
- On the east side of the utility corridor, approximately 10.8 acres would be available for brackish marsh creation behind the protective vegetated berm. This is enough area for all of the needed brackish marsh creation (5 acres), and for most of the brackish marsh enhancement (all but approximately 1 acre).
- About 2.9 acres of riparian area along the southern edge of the river could be enhanced by removal of tamarisk.
- Contiguous with the southern river edge, 4.29 acres of mule fat/southern willow scrub could be created, which is more than the acreage needed to mitigate for project impacts. However, this leaves a gap between the berm and the created riparian area that is not desirable to any of the agencies present or to the U.S. Fish and Wildlife Service, who discussed the graphic with CDFG in advance of the meeting. After a group discussion regarding what could be planted in the gap, it was decided that the area of riparian creation will be changed to close the gap.
- The riparian creation area would not meet the definition of Corps wetlands unless the area north of the berm were lowered to the depth of the river. This may not be desirable because it could change river hydraulics.
- More than 3 acres of high salt marsh could be created on the west side of the utility corridor. The area shown on the graphic will be moved to the south, to avoid property owned by CDFG.
- A 100-foot buffer is shown between the brackish marsh creation area and the western side of the proposed pedestrian walkway on widened El Camino Real. The buffer is intended to be planted with native species, likely upland types. CDFG would not want to see this buffer width reduced.
- The berm is required to protect the brackish marsh. However, mule fat is expected to easily flourish on the site without lowering the area. If out-of-kind mitigation were acceptable, the berm could

be eliminated and a high ratio of riparian creation could be provided on the east side of the JPA property. CDFG noted they do want to see brackish marsh created as mitigation for the impacts to clapper rail habitat. The Coastal Commission noted they typically require 4:1 in-kind mitigation for such impacts in the Coastal Zone.

- The Coastal Commission noted they require all impacts in the Coastal Zone to be mitigated by creation, and do not allow enhancement to be counted. Impacts of the Eastern Alignment in the Coastal Zone are 0.61 acre riparian scrub and 0.96 acre coastal wetlands (brackish marsh and salt marsh), with the present Coastal Zone boundary along the eastern edge of existing El Camino Real. Impact acreages in the Coastal Zone will be provided for all alternatives in the environmental document. The City will request a boundary determination from the Coastal Commission for each alternative.
- 11. **Clapper Rail Movement**. Connectivity of the existing clapper rail habitat to the proposed mitigation area is critical. There are an estimated 12 pair of clapper rail between El Camino Real and Morgan Run, according to CDFG. How will the clapper rail know there is a desirable area created, and how will they get into the mitigation area created behind the berm? These questions must be answered in the environmental document.
- 12. **Revised Concept**. Based on the above meeting discussion, a revised concept will be prepared and provided in a separate letter to the permitting agencies. A field meeting could be arranged if the agencies decide it would be beneficial.



June 17, 2005 Project No.103645002

Mr. Edgar A. Camerino, P.E. Rick Engineering Company 5620 Friars Road San Diego, California 92110-2596

Subject: Limited Geotechnical Evaluation JPA Mitigation Project San Diego, California

Dear Mr. Camerino:

In accordance with your request and authorization, we have performed a limited geotechnical evaluation regarding the proposed JPA Mitigation Project, in San Diego, California. The purpose of our evaluation was to provide subsurface data with respect to groundwater elevations (depths) at the site. The data will be used to help evaluate the suitability of the proposed site to be converted to a wetlands area as part of the El Camino Real Bridge widening project.

Our services included review of readily available background information including, previously prepared geotechnical reports prepared by Ninyo & Moore for the proposed widening of the El Camino Real Bridge, geologic maps, topographic maps, and stereoscopic aerial photographs. Our services also included preparation of a County of San Diego Department of Environmental Health boring permit waiver, performance of a field reconnaissance and limited subsurface exploration, analysis of data obtained, and the preparation of this letter report presenting our findings and conclusions.

As you know, we have previously performed a geotechnical evaluation for widening of El Camino Real between Via De La Valle and San Dieguito Road, as well as preparation of a foundation report for the widening of the subject bridge over the San Dieguito River. The proposed exploratory borings for this phase of the project were advanced in the proposed mitigation area, west of the El Camino Real Bridge. The site area slopes gently toward the north (San

5710 Ruffin Road • San Diego, California 92123 • Phone (858) 576-1000 • Fax (858) 576-9600

Dieguito River) and is currently being utilized for agricultural purposes. Based on our review of topographic data, the elevation at the site is approximately 20 feet above mean sea level.

Our subsurface evaluation was performed on June 13, 2005, and consisted of the excavation, logging, and sampling of four exploratory borings. The borings were advanced with a hand auger system to the depth of groundwater. Selected soil samples were collected for sample identification. In general, the groundwater depths encountered during our subsurface evaluation ranged from approximately 2.7 feet to 6 feet below the existing ground surface. The borings were backfilled with bentonite in general accordance with the County of San Diego Department of Environmental Health guidelines.

If you have any questions regarding this report, please contact the undersigned. We appreciate the opportunity to be of service on this project.

Respectfully submitted, NINYO & MOORE

Robert T. Wheeler Project Geologist

RTW/RI/gg

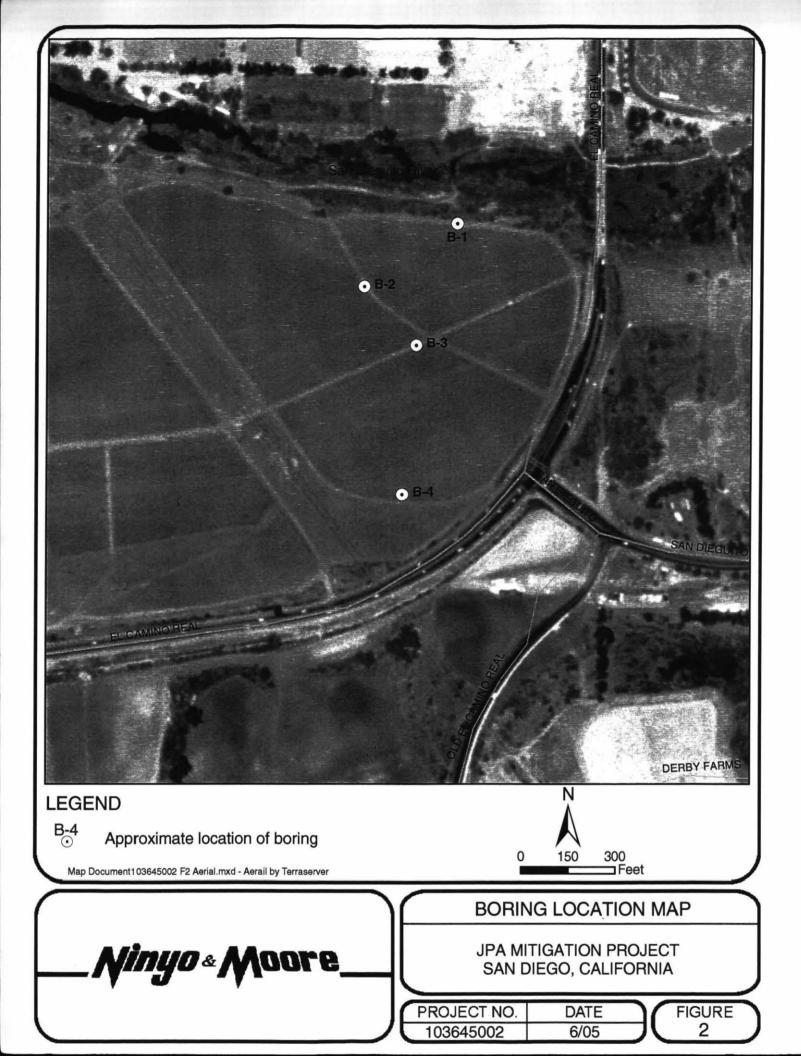
Distribution: (1) Addressee

Attachments: - Figure 1 - Site Location Map Figure 2 - Boring Location Map Figure 3 - Boring Logs

Randal L. Irwin, C.E.G. Chief Engineering Geologist







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1927 Fifth Avenue Son Diego, CA 92101-2358 P 619 308 9333 F 619 308 9334 www.recon-us.com

RECON

March 21, 2006

Mr. Norm Arndt **Rick Engineering Company** 5620 Friars Road San Diego, CA 92110-2596

Reference: Results of the Bat Presence/Absence Survey for the El Camino Real Road and Bridge Widening (RECON Number 4256B)

Dear Mr. Arndt:

This letter describes the results of a bat survey conducted on March 16, 2006 for the El Camino Real Road and Bridge Widening project in San Diego, California. The proposed project includes widening El Camino Real from Via de la Valle to San Dieguito Road and widening or replacing the bridge over the San Dieguito River. The purpose of the survey was to determine whether bats are using the bridge.

The survey was conducted between 5:20 P.M. and 6:30 P.M., the temperature was 60 degrees Fahrenheit, wind speeds ranged from one to five miles per hour, and the sky was mostly clear with a band of clouds on the western horizon. Sunset occurred at 5:57 Р.м. The survey methods included visually examining the underside of the bridge for bats and structures that would support bat roosting or nursery sites. The ground below and adjacent to the bridge was also visually examined for bat sign (guano). After visually inspecting the bridge, I monitored the bridge as the sun set and for one half-hour afterward for bats leaving the bridge to begin nighttime foraging.

The bridge design is such that it does not provide much suitable roosting or nursery habitat for bats. The exception is the expansion gap in the center of the bridge. Due to the inundation of the San Dieguito River, it was not possible to examine the expansion gap directly. There are many cliff swallow (Petrochelidon pyrthonota) nests along the side of the bridge, and one black phoebe (Sayomis nigricans semiatra) nest is tucked in a corner under the bridge.

No bats were observed using the bridge, exiting the bridge to begin foraging, or flying with the flocks of swallows flying over the adjacent agricultural fields.

There is a low potential for bats to use this bridge in the future, due to the lack of suitable roosting or nursery areas. However, if the approved project includes impacts to the bridge, a preconstruction clearance survey may be warranted to ensure that bats and/or nesting birds are not impacted during construction.

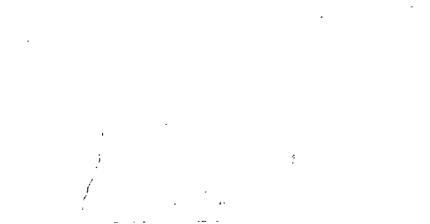
If you have any questions regarding this letter, please do not hesitate to contact me at aclark@recon-us.com or 619-308-9333.

Sincerely,

Amy E. Clark

Biologist

AEC:sh



NATIVE AMERICAN CONTACT LETTERS

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TIERRA Environmental Services

January 17, 2006

Ms. Rhonda Welch-Scalco, Chairperson Barona Band of Mission Indians 1095 Barona Road Lakeside, California 92040

Dear Ms. Welch-Scalco:

Our firm has been retained by Earth Tech, Inc. to conduct an archaeological survey for a portion of El Camino Real in the City of San Diego (Figure 1). Because we have not contacted you since 1998 on this project, one purpose of this letter is too provide you with a current update. Tierra Environmental Services (Tierra) conducted cultural resource inventories of approximately 37 acres in 1998, 2003, 2004, and 2005 for proposed improvements to a portion of El Camino Real crossing the San Dieguito River Valley, to determine if cultural resources would be impacted. The project crosses the San Dieguito River northeast of Del Mar. The project site is located within Sections 6 and 7, T14S, R3W, of the Del Mar 7.5 minute USGS Quadrangle (Figure 2).

The cultural resources study is being conducted pursuant to the National Historic Preservation Act (NHPA), California Environmental Quality Act (CEQA) and City of San Diego Guidelines. A records search was conducted and revealed that one previously recorded site CA-SDI-686 Locus C was located within the area of potential effect (APE). The site was previously determined by the City of San Diego not to be significant, and it was not relocated during the surveys conducted in 1998 and 2003. Overall, 33 previous cultural resource studies have been conducted within a one-mile radius of the project area and 55 previously recorded cultural resources have been located within a one-mile radius of the project area. Three sites CA-SDI-14,969, CA-SDI-8,225/H and CA-SDI-10,117 were recorded adjacent to the project area and an effort was made to ensure that these sites did not extend into the APE. All three of these sites were relocated and found to be outside the APE. We are currently preparing a report for this project.

In addition to informing you about this project, a major purpose of this letter is to request any information that you and other tribal elders may have regarding cultural resources located in the vicinity of the project site, pursuant to City Guidelines and Section 106 of the NHPA. Any information you may have about cultural resources on the property would greatly benefit our study.

If you or other tribal members have any knowledge about cultural resources located on the project site, please contact me. If I can provide any additional information, please contact me immediately at (858)578-9064. Thank you for your assistance.

Sincerely,

Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures

9915 Businesspark Ave., Suite C, San Diego, CA 92131-1120 Phone: (858) 578-9064 ▲ Fax: (858) 578-3646 E-mail: TierraEnv@aol.com



TIERRA Environmental Services

January 17, 2006

Mr. Anthony Pico, Chairman Viejas Band of Kumeyaay Indians P.O. Box 908 Alpine, CA 91903

Dear Mr. Pico:

Our firm has been retained by Earth Tech, Inc. to conduct an archaeological survey for a portion of El Camino Real in the City of San Diego (Figure 1). Because we have not contacted you since 1998 on this project, one purpose of this letter is too provide you with a current update. Tierra Environmental Services (Tierra) conducted cultural resource inventories of approximately 37 acres in 1998, 2003, 2004, and 2005 for proposed improvements to a portion of El Camino Real crossing the San Dieguito River Valley, to determine if cultural resources would be impacted. The project crosses the San Dieguito River northeast of Del Mar. The project site is located within Sections 6 and 7, T14S, R3W, of the Del Mar 7.5 minute USGS Quadrangle (Figure 2).

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Michael G. Baksh, Ph.D. Principal Anthropologist

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TIERRA Environmental services

January 17, 2006

Mr. Mark Romero, Chairman Mesa Grande Band of Mission Indians P.O. Box 270 Santa Ysabel, California 92070

Dear Mr. Romero:

Our firm has been retained by Earth Tech, Inc. to conduct an archaeological survey for a portion of El Camino Real in the City of San Diego (Figure 1). Because we have not contacted you since 1998 on this project, one purpose of this letter is too provide you with a current update. Tierra Environmental Services (Tierra) conducted cultural resource inventories of approximately 37 acres in 1998, 2003, 2004, and 2005 for proposed improvements to a portion of El Camino Real crossing the San Dieguito River Valley, to determine if cultural resources would be impacted. The project crosses the San Dieguito River northeast of Del Mar. The project site is located within Sections 6 and 7, T14S, R3W, of the Del Mar 7.5 minute USGS Quadrangle (Figure 2).

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Sincerely,

Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures



TIERRA Environmental Services

January 17, 2006

Mr. Allen Lawson, Spokesman San Pasqual Band of Mission Indians P.O. Box 365 Valley Center, California 92082

Dear Mr. Lawson:

Our firm has been retained by Earth Tech, Inc. to conduct an archaeological survey for a portion of El Camino Real in the City of San Diego (Figure 1). Because we have not contacted you since 1998 on this project, one purpose of this letter is too provide you with a current update. Tierra Environmental Services (Tierra) conducted cultural resource inventories of approximately 37 acres in 1998, 2003, 2004, and 2005 for proposed improvements to a portion of El Camino Real crossing the San Dieguito River Valley, to determine if cultural resources would be impacted. The project crosses the San Dieguito River northeast of Del Mar. The project site is located within Sections 6 and 7, T14S, R3W, of the Del Mar 7.5 minute USGS Quadrangle (Figure 2).

The cultural resources study is being conducted pursuant to the National Historic Preservation Act (NHPA), California Environmental Quality Act (CEQA) and City of San Diego Guidelines. A records search was conducted and revealed that one previously recorded site CA-SDI-686 Locus C was located within the area of potential effect (APE). The site was previously determined by the City of San Diego not to be significant, and it was not relocated during the surveys conducted in 1998 and 2003. Overall, 33 previous cultural resource studies have been conducted within a one-mile radius of the project area and 55 previously recorded cultural resources have been located within a one-mile radius of the project area. Three sites CA-SDI-14,969, CA-SDI-8,225/H and CA-SDI-10,117 were recorded adjacent to the project area and an effort was made to ensure that these sites did not extend into the APE. All three of these sites were relocated and found to be outside the APE. We are currently preparing a report for this project.

In addition to informing you about this project, a major purpose of this letter is to request any information that you and other tribal elders may have regarding cultural resources located in the vicinity of the project site, pursuant to City Guidelines and Section 106 of the NHPA. Any information you may have about cultural resources on the property would greatly benefit our study.

If you or other tribal members have any knowledge about cultural resources located on the project site, please contact me. If I can provide any additional information, please contact me immediately at (858)578-9064. Thank you for your assistance.

Sincerely,

Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures

9915 Businesspark Ave., Suite C, San Diego, CA 92131-1120 Phone: (858) 578-9064 ▲ Fax: (858) 578-3646 E-mail: TierraEnv@aol.com



TIERRA Environmental Services

January 17, 2006

Mr. Albert Phoenix Barona Band of Mission Indians 1095 Barona Road Lakeside, California 92040

Dear Mr. Phoenix:

Our firm has been retained by Earth Tech, Inc. to conduct an archaeological survey for a portion of El Camino Real in the City of San Diego (Figure 1). Because we have not contacted you since 1998 on this project, one purpose of this letter is too provide you with a current update. Tierra Environmental Services (Tierra) conducted cultural resource inventories of approximately 37 acres in 1998, 2003, 2004, and 2005 for proposed improvements to a portion of El Camino Real crossing the San Dieguito River Valley, to determine if cultural resources would be impacted. The project crosses the San Dieguito River northeast of Del Mar. The project site is located within Sections 6 and 7, T14S, R3W, of the Del Mar 7.5 minute USGS Quadrangle (Figure 2).

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Enclosures

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El Camino Real: Native American Mailing List

Ms. Rhonda Welch-Scalco, Chairperson Barona Band of Mission Indians 1095 Barona Road Lakeside, CA 92040

Mr. Albert Phoenix Barona Band of Mission Indians 1095 Barona Road Lakeside, CA 92040

Mr. Allen Lawson, Spokesman Attn: Ms. Dorothy Tavui San Pasqual Band of Mission Indians P.O. Box 365 Valley Center, CA 92082

Mr. Steve Banegas Kumeyaay Cultural Repatriation Committee 1095 Barona Road Lakeside, CA 92040+

Mr. Mark Romero, Chairman Mesa Grande Band of Mission Indians P.O. Box 270 Santa Ysabel, CA 92070

Mr. Anthony Pico, Chairman Viejas Band of Kumeyaay Indians P.O. Box 908 Alpine, CA 91903

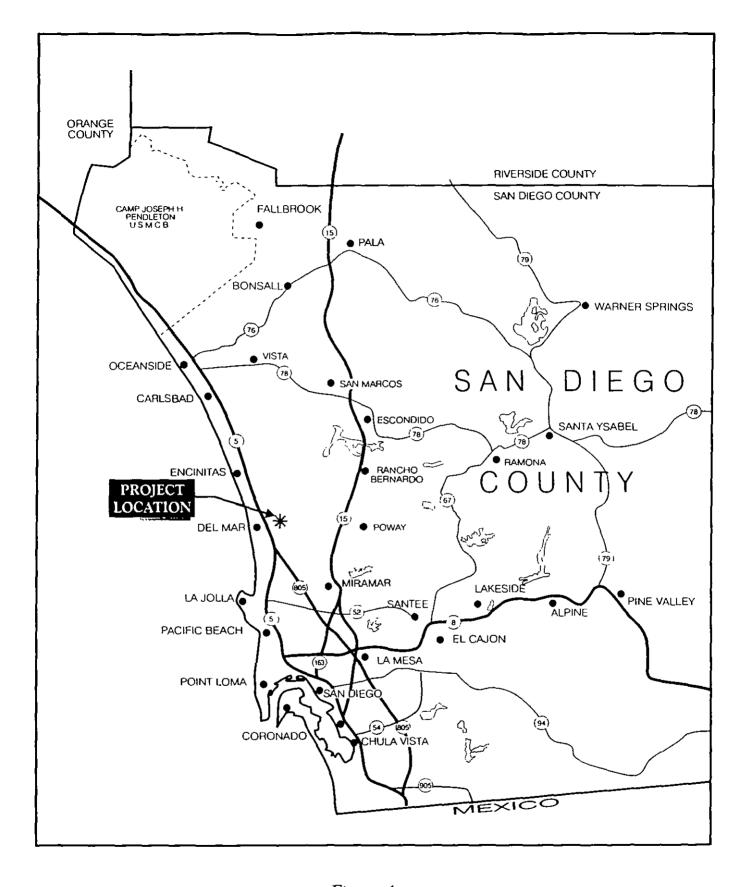
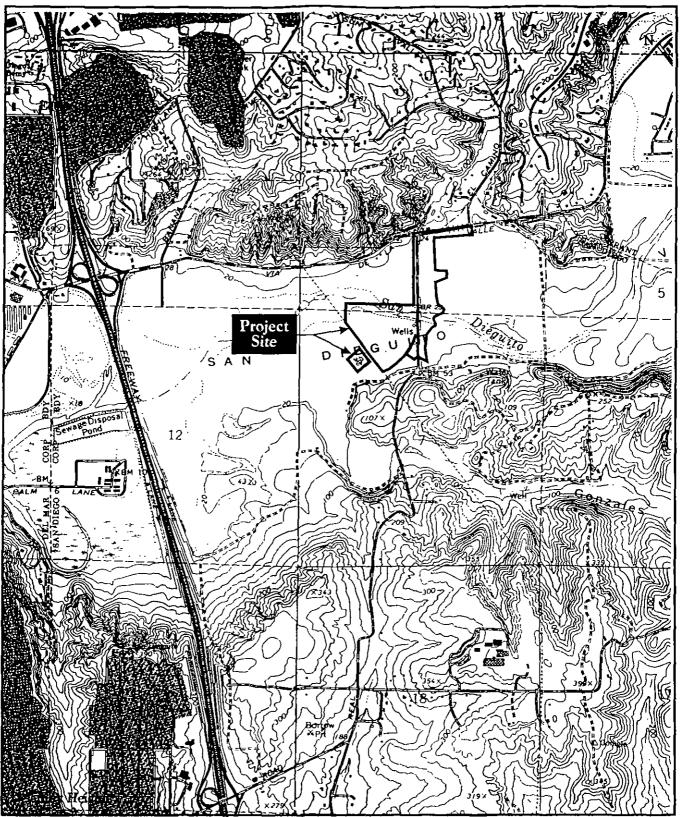




Figure 1 Regional Location Map



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SOURCE: USGS 7.5' Quad Maps (Del Mar 1969 Edition Photorevised in 1975)



Figure 2 Project Location Map



TIERRA Environmental Services



December 11, 1998

Mr. Clifford LaChappa, Chairman Barona Reservation 1095 Barona Road Lakeside, California 92040

Dear Mr. LaChappa:

Our firm has been retained by Earth Tech, Inc. to conduct an archaeological survey for a portion of El Camino Real in the City of San Diego (Figure 1). The proposed project consists of widening El Camino Real to a four-lane road for a length of approximately 0.5 miles between San Dieguito Road and Via de la Valle. The project site is located within Sections 6 and 7, T14S, R3W, of the Del Mar 7.5 minute USGS Quadrangle (Figure 2).

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Sincerely,

Michael Bakel

Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures

9903-E Businesspark Ave., San Diego, CA 92131-1120 Phone: (619) 578-9064 ▲ Fax: (619) 578-3646

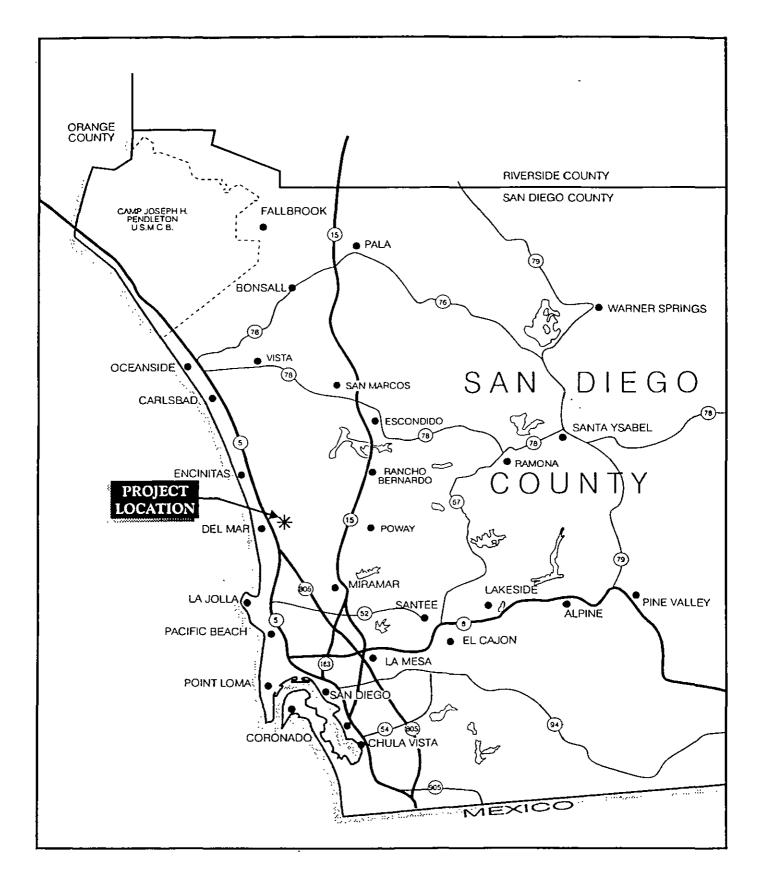
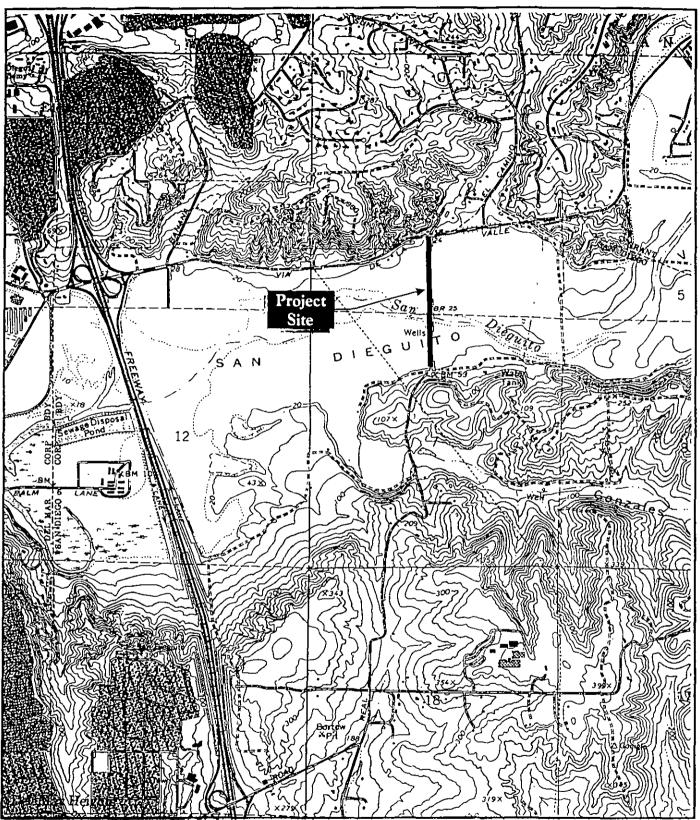


Figure 1 Regional Location Map



ENVIRONMENTAL SERVICES



SOURCE: USGS 7.5' Quad Maps (Del Mar 1969 Edition Photorevised in 1975)



Figure 2 Project Location Map



TIERRA ENVIRONMENTAL SERVICES

El Camino Real Widening: Native American Mailing List

Mr. Clifford LaChappa, Chairman Barona Group of the Capitan Grande Band of Mission Indians 1095 Barona Road Lakeside, California 92040

Mr. Albert Phoenix Barona Group of the Capitan Grande Band of Mission Indians 1095 Barona Road Lakeside, California 92040

Mr. Ralph Goff, Chairman Campo Band of Mission Indians 36190 Church Road, Suite 1 Campo, California 91906

Tribal Chairman Capitan Grande General Council 1095 Barona Road Lakeside, California 92040

Mr. Tony J. Pinto, Chairman Cuyapaipe Band of Mission Indians 2271 Alpine Blvd #D Alpine, California 91901

Ms. Rebecca Maxcy Inaja & Cosmit Reservation P.O. Box 186 Santa Ysabel, California 92070

Mr. Kenneth Meza, Chairperson Jamul Band of Mission Indians P.O. Box 612 Jamul, California 91935

Ms. Gwendolyn Parada, Chairperson La Posta Reservation 8 Crestwood Road Boulevard, California 91905 -

Ms. Frances Shaw, Chairperson Manzanita Band of Mission Indians P.O. Box 1302 Boulevard, California 91905

Mr. Howard Maxcy, Chairman Mesa Grande Band of Mission Indians P.O. Box 270 Santa Ysabel, California 92070

Mr. Allen Lawson, Spokesman Attn: Ms. Dorothy Tavui San Pasqual Band of Mission Indians P.O. Box 365 Valley Center, California 92082

Mr. Ben Scerato, Chairman Santa Ysabel Band of Diegueño Indians P.O. Box 130 Santa Ysabel, California 92070

Ms. Georgia Kimble, Spokesperson Sycuan Band of Mission Indians 5459 Dehesa Road El Cajon, California 92019

Mr. Anthony Pico, Chairman Viejas Group of Capitan Grande Band of Mission Indians P.O. Box 908 Alpine, California 91903

.

Mr. Clarence Brown Viejas Group of Capitan Grande P.O. Box 908 Alpine, California 91903



December 11, 1998

Mr. Ralph Goff, Chairman Campo Band of Mission Indians 36190 Church Road, Suite 1 Campo, California 91906

Dear Mr. Goff:

Our firm has been retained by Earth Tech, Inc. to conduct an archaeological survey for a portion of El Camino Real in the City of San Diego (Figure 1). The proposed project consists of widening El Camino Real to a four-lane road for a length of approximately 0.5 miles between San Dieguito Road and Via de la Valle. The project site is located within Sections 6 and 7, T14S, R3W, of the Del Mar 7.5 minute USGS Quadrangle (Figure 2).

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Sincerely,

Wichard Brlich

Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures



December 11, 1998

Tribal Chairman Capitan Grande General Council 1095 Barona Road Lakeside, California 92040

Dear Tribal Chairman:

Our firm has been retained by Earth Tech, Inc. to conduct an archaeological survey for a portion of El Camino Real in the City of San Diego (Figure 1). The proposed project consists of widening El Camino Real to a four-lane road for a length of approximately 0.5 miles between San Dieguito Road and Via de la Valle. The project site is located within Sections 6 and 7, T14S, R3W, of the Del Mar 7.5 minute USGS Quadrangle (Figure 2).

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Sincerely,

Michael Babel

Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures



December 11, 1998

Mr. Tony J. Pinto, Chairman Cuyapaipe Band of Mission Indians 2271 Alpine Blvd #D Alpine, California 91901

Dear Mr. Pinto:

Our firm has been retained by Earth Tech, Inc. to conduct an archaeological survey for a portion of El Camino Real in the City of San Diego (Figure 1). The proposed project consists of widening El Camino Real to a four-lane road for a length of approximately 0.5 miles between San Dieguito Road and Via de la Valle. The project site is located within Sections 6 and 7, T14S, R3W, of the Del Mar 7.5 minute USGS Quadrangle (Figure 2).

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Sincerely,

Michael Brhah

Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures

9903-E Businesspark Ave., San Diego, CA 92131-1120 Phone: (619) 578-9064 ▲ Fax: (619) 578-3646



December 11, 1998

Ms. Rebecca Maxcy Inaja & Cosmit Reservation P.O. Box 186 Santa Ysabel, California 92070

Dear Ms. Maxcy:

Our firm has been retained by Earth Tech, Inc. to conduct an archaeological survey for a portion of El Camino Real in the City of San Diego (Figure 1). The proposed project consists of widening El Camino Real to a four-lane road for a length of approximately 0.5 miles between San Dieguito Road and Via de la Valle. The project site is located within Sections 6 and 7, T14S, R3W, of the Del Mar 7.5 minute USGS Quadrangle (Figure 2).

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Sincerely,

Michael Brikeh

Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures



December 11, 1998

Mr. Kenneth Meza, Chairperson Jamul Band of Mission Indians P.O. Box 612 Jamul, California 91935

Dear Mr. Meza:

Our firm has been retained by Earth Tech, Inc. to conduct an archaeological survey for a portion of El Camino Real in the City of San Diego (Figure 1). The proposed project consists of widening El Camino Real to a four-lane road for a length of approximately 0.5 miles between San Dieguito Road and Via de la Valle. The project site is located within Sections 6 and 7, T14S, R3W, of the Del Mar 7.5 minute USGS Quadrangle (Figure 2).

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Michael Ballety

Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures



December 11, 1998

Ms. Gwendolyn Parada, Chairperson La Posta Reservation 1064 Barona Road Lakeside, California 92040

Dear Ms. Parada:

Our firm has been retained by Earth Tech, Inc. to conduct an archaeological survey for a portion of El Camino Real in the City of San Diego (Figure 1). The proposed project consists of widening El Camino Real to a four-lane road for a length of approximately 0.5 miles between San Dieguito Road and Via de la Valle. The project site is located within Sections 6 and 7, T14S, R3W, of the Del Mar 7.5 minute USGS Quadrangle (Figure 2).

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Michael Balleh

Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures



December 11, 1998

Mr. Howard Maxcy, Chairman Mesa Grande Band of Mission Indians P.O. Box 270 Santa Ysabel, California 92070

Dear Mr. Maxcy:

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Sincerely,

Wichael Bruch

Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures



TIERRA ENVIRONMENTAL SERVICES

December 11, 1998

Mr. Allen Lawson, Spokesman San Pasqual Band of Mission Indians P.O. Box 365 Valley Center, California 92082

Dear Mr. Lawson:

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Michael Bakely

Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures



December 11, 1998

Mr. Ben Scerato, Chairman Santa Ysabel Band of Diegueño Indians P.O. Box 130 Santa Ysabel, California 92070

Dear Mr. Scerato:

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Michael Brlich

Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures



December 11, 1998

Ms. Georgia Kimble, Spokesperson Sycuan Band of Mission Indians 5459 Dehesa Road El Cajon, California 92019

Dear Ms. Kimble:

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Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures



TIERRA ENVIRONMENTAL SERVICES

December 11, 1998

Mr. Anthony Pico, Chairman Viejas Group of Capitan Grande Band of Mission Indians P.O. Box 908 Alpine, California 91903

Dear Mr. Pico:

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Enclosures



December 11, 1998

Mr. Clarence Brown Viejas Group of Capitan Grande Band of Mission Indians P.O. Box 908 Alpine, California 91903

Dear Mr. Brown:

Our firm has been retained by Earth Tech, Inc. to conduct an archaeological survey for a portion of El Camino Real in the City of San Diego (Figure 1). The proposed project consists of widening El Camino Real to a four-lane road for a length of approximately 0.5 miles between San Dieguito Road and Via de la Valle. The project site is located within Sections 6 and 7, T14S, R3W, of the Del Mar 7.5 minute USGS Quadrangle (Figure 2).

The cultural resources study is being conducted pursuant to the National Historic Preservation Act (NHPA), California Environmental Quality Act (CEQA) and City of San Diego Guidelines. A records search identified site SDM-W-45 at the northern end of the project and CA-SDI-686 (Locus C) near the southern terminus of the project. A cultural resource survey revealed a light scatter of *Mytilus* shell in the area of SDM-W-45, suggesting that at least a portion of the site still exists. The area of CA-SDI-686 Locus C appears to have been heavily impacted by the previous realignment of El Camino Real, although isolated shell fragments near this location suggest a potential for buried deposits in the area. We are currently preparing a draft report for this project.

In addition to informing you about this project, a major purpose of this letter is to request any information that you and other tribal elders may have regarding cultural resources located in the vicinity of the project site, pursuant to City Guidelines and Section 106 of the NHPA. Any information you may have about cultural resources on the property would greatly benefit our study.

If you or other tribal members have any knowledge about cultural resources located on the project site, please contact me. If I can provide any additional information, please contact me immediately at 619-578-9064. Thank you for your assistance.

Sincerely,

Michael Backel

Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures



December 11, 1998

Mr. Albert Phoenix Barona Indian Reservation 1095 Barona Road Lakeside, California 92040

Dear Mr. Phoenix:

Our firm has been retained by Earth Tech, Inc. to conduct an archaeological survey for a portion of El Camino Real in the City of San Diego (Figure 1). The proposed project consists of widening El Camino Real to a four-lane road for a length of approximately 0.5 miles between San Dieguito Road and Via de la Valle. The project site is located within Sections 6 and 7, T14S, R3W, of the Del Mar 7.5 minute USGS Quadrangle (Figure 2).

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Sincerely,

Michael Brilieh

Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures

9903-E Businesspark Ave., San Diego, CA 92131-1120 Phone: (619) 578-9064 ▲ Fax: (619) 578-3646



December 11, 1998

Ms. Frances Shaw, Chairperson Manzanita Band of Mission Indians P.O. Box 1302 Boulevard, California 91905

Dear Ms. Shaw:

Our firm has been retained by Earth Tech, Inc. to conduct an archaeological survey for a portion of El Camino Real in the City of San Diego (Figure 1). The proposed project consists of widening El Camino Real to a four-lane road for a length of approximately 0.5 miles between San Dieguito Road and Via de la Valle. The project site is located within Sections 6 and 7, T14S, R3W, of the Del Mar 7.5 minute USGS Quadrangle (Figure 2).

The cultural resources study is being conducted pursuant to the National Historic Preservation Act (NHPA), California Environmental Quality Act (CEQA) and City of San Diego Guidelines. A records search identified site SDM-W-45 at the northern end of the project and CA-SDI-686 (Locus C) near the southern terminus of the project. A cultural resource survey revealed a light scatter of *Mytilus* shell in the area of SDM-W-45, suggesting that at least a portion of the site still exists. The area of CA-SDI-686 Locus C appears to have been heavily impacted by the previous realignment of El Camino Real, although isolated shell fragments near this location suggest a potential for buried deposits in the area. We are currently preparing a draft report for this project.

In addition to informing you about this project, a major purpose of this letter is to request any information that you and other tribal elders may have regarding cultural resources located in the vicinity of the project site, pursuant to City Guidelines and Section 106 of the NHPA. Any information you may have about cultural resources on the property would greatly benefit our study.

If you or other tribal members have any knowledge about cultural resources located on the project site, please contact me. If I can provide any additional information, please contact me immediately at 619-578-9064. Thank you for your assistance.

Sincerely,

Michael Bakeh

Michael G. Baksh, Ph.D. Principal Anthropologist

Enclosures

CITY OF SAN DIEGO EL CAMINO REAL ROAD/BRIDGE PROJECT AGENCIES MEETING

Meeting Notes for September 26, 2012

Attendees

City: Kerry Santoro, Jerry Jakubauskas, Brad Johnson Rick Engineering: Edgar Camerino, Brendan Hastie RECON: Lisa Lind Hon Consulting: Katherine Hon Nordby Biological: Chris Nordby RBF: Monica Kling Caltrans: Kevin Hovey, Bob James CDFG: Tim Dillingham, Libby Lucas, Kyle Dutro US Fish and Wildlife: Sally Brown USACOE: Michelle Madsen, Stephanie Hall State Water Board: Alan Monji

Discussion

1. Review of Project Purpose and Need (City) – Following introductions, Kerry provided an overview of the project, including the project purpose related to the structural deficiencies and potential flood hazards of the existing El Camino Real Bridge. The bridge is not high enough for a 100 year flood event and does not meet current seismic standards.

2. Background/History/Timetable (City) – 1998 FHWA approved funding for the project with a 10-year timeline. In 2006 a Draft EIR was circulated for public review. Since that time, the City has been looking into additional alternatives and narrowing the footprint in response to community and agency concerns. The City also updated technical studies. The City was also granted an extension from FHWA and as a result is looking to complete the environmental by March 2013. Because the March 2013 deadline may not be met, Caltrans on behalf of the City has requested an unprecedented second extension. The City is currently waiting for the FHWA decision.

3. Current Project/Changes from Past Project - Bridge Design (Rick Engineering) - Edgar and Brendan reviewed the major changes, including: a reduction of 18-feet for the cross sections with reduced widths for travel lanes, bicycle lanes, and medians, a new tie-in to the D R Horton project, and eliminating the channel on the Kruer (former Hu) property in place of a new storm drain plan. Removal of the existing bridge after construction of a new bridge, and the introduction of roundabout alternatives are also changes from the past project. USACOE requested clarification on the length of the bridge and requested that a longer bridge be evaluated. Brendan indicated that the proposed bridge meets the hydraulic requirements. A longer bridge is discussed in the Alternatives Considered but Rejected chapter of both the EIR and the EA. The current proposed bridge design maintains the width of the channel for the protection of clapper rail habitat, and a longer bridge would not provide a benefit to clapper rail habitat. The river channel only carries the 10-year flow within its banks. Higher flows overtop the river banks. The substructure of the bridge needs to be clearly defined and may need to be retained so as not to negatively affect that area. All aboveground elements of the existing bridge will be removed entirely. When the engineers say the "substructure" would remain, they mean the buried piles. Rick Engineering clarified that the bridge for the Eastern Alignment and Roundabout alternatives is at an angle for geometry, so the road can meet De La Valle Place. This design does not affect hydraulics because the columns are round.

Agencies requested additional exhibits be added to the document, including an existing cross-section and a cross-section exhibit for each of the project alternatives. In addition, the location of the sewer line and protective rip rap blanket should be noted. Sally would like to see the rip rap blanket removed if it isn't

necessary to protect the columns; however, we need to look at whether a stabilized river bed may be something the clapper rail like and therefore replacing the rip rap blanket would be needed to avoid impacts.

The agencies requested that the environmental documents disclose that this project would not limit or preclude what can happen on the Fairbanks Ranch property, including creation of additional riparian areas. CDFG clarified that the diagram of mitigation that was supposed to occur attached to their 2006 letter was to be a gentle transition of freshwater marsh with riparian scrub terrace, not a widening of the river.

Michelle asked for clarification of the City departments and Kerry explained what Real Estate Assets, Development Services, and Capital Improvements do.

4. Bridge Construction Methodology Memorandum (Rick Engineering) – Rick Engineering discussed the two methodologies that will be included in the Draft EIR: berm versus trestle. The agencies provided their major concerns: berm would result in fill and a potential for washout during a significant rain event while the trestle would require piles for false work. The trestle would allow construction equipment to be above low river flows. CDFG requested data for sediment transport through the river channel and clear description of the materials that will be used to construct the berm. Kevin suggested that the environmental documents explain what storm event might wash out a berm. USACOE said the trestle may be preferable to the berm for construction; however, the agencies did not identify a preferred method and noted they will wait until the Draft EIR is out for public review in order to assess impacts for both options. All are looking for analysis that considers wildlife movement, hydrology, and duration of construction.

5. Other Impacts/Concerns (Nordby/Agencies) – USFWS brought up potential impacts to mule-fat scrub as a result of the grading under the north abutment. Brad mentioned that the north bridge abutment of the new bridge will be approximately 9 feet higher than the existing bridge, and as a result of the new fill, the existing vegetation will be disturbed regardless of whether or not a trail is constructed. There was confusion about the map of biological impacts showing impacts west of the existing bridge, and this needs to be clarified. The north abutment has been designed to accommodate a planned JPA trail. Per NEPA Section 4(f) requirements the project must not preclude any existing or future (planned) trail. This issue will be looked at. Eastern Alignment as City preferred alternative was raised as a concern by both wildlife agencies due to potential wetland impacts. Environmental documents need to clearly state impacts from all alternatives. Kevin stated Caltrans does not know yet which alternative is less impactive, and emphasized they have to consider more than biological resources impacts.

6. Mitigation (City/Nordby/Agencies) - Project impacts include disturbance of the salt marsh on the Kruer property, however mitigation for this vegetation community is not available on the JPA mitigation site for this project. There would be excess freshwater marsh creation available to satisfy the other mitigation requirements, and that could include Clapper Rail habitat mitigation needs. Chris noted that the mitigation approach to be ultimately approved will dictate if the JPA mitigation site can accommodate all of the mitigation needs for the project. Michelle noted that a proposed invasives removal plan in the river that would be implemented sooner rather than later would be viewed favorably. They are looking for a watershed approach. Tamarisk and pampas grass removal upstream would help protect the future W-19 restoration and the San Dieguito Lagoon restoration downstream. She suggested proposing this aspect as part of the mitigation plan rather than having the agencies require it as maintenance. Libby asked what was the invasive removal requirement for Fairbanks Ranch and the Polo Field code violation. This cannot be counted twice and may limit the "credit" for invasive removal plans as part of El Camino Real. Michelle stated they understand the expense associated with the "in perpetuity" requirement and would accept a defined time frame. The City will confirm if this mitigation has already been established as mitigation for the Fairbanks Ranch project and if it would be a viable option for this project. The agencies were interested in what would happen to the vacated roadway. Sally, Michelle and Libby agreed they would like to see the asphalt removed. Jerry explained that a portion will need to be retained for access to adjacent properties. The agencies asked if any of the W-19 acreage would be available for Fairbanks Ranch mitigation, and Kerry said she didn't think so, given the number of projects already wanting to use the mitigation area, including LOSSAN, I-5 widening, and EI Camino Real.

From: Elizabeth Lucas [mailto:ELucas@dfg.ca.gov]
Sent: Thursday, November 15, 2012 12:50 PM
To: Santoro, Kerry
Cc: Kyle Dutro; Tim Dillingham; 'kevin_hovey@dot.ca.gov'; 'Robert A James'; Sally Brown@fws.gov; nordbybio@gmail.com; aashimine@rbf.com; 'Lisa Lind'; bhastie@rickengineering.com; ecamerino@rickengineering.com; Johnson, Brad; Marsden, Dean; Jerry Jakubauskas; Michelle L SPL Mattson; stephanie.j.hall@usace.army.mil; Alan@Waterboards' 'Monji
Subject: El Camino Real Project Update Meeting Minutes

Hello Kerry,

Thank you for the minutes of the 9-26 meeting on the El Camino Real Bridge Project (Project). Just for the record, the minutes did not capture the following two points made during the meeting (for our purposes, this email effectively modifies the minutes).

1. DFG requested that the recirculated EIR address all the comments in the Wildlife Agencies' October 26, 2006, letter on the draft EIR for the Project.

2. Because the equestrian trail was a subject of significant discussion during the meeting, DFG explicitly pointed to comment #11 in that 2006 letter; that comment addresses the need for the EIR to include in its analysis the impacts of the equestrian trail (not just the grading for the trail).

Regarding the discussion of invasive species removal in San Dieguito River (item #6 in the minutes), attached is DFG's 2003 letter re: the last nine holes of the Fairbanks Ranch golf course; see #7 on page 4 re: the invasive species removal within the River. I assume that the City also required on-going invasive species removal within this reach of the River, but don't know for sure.

I think you were going to include the sign-in sheet for the 9-26 meeting with the minutes. Would you please email it out now?

Thank you.

Libby

Libby Lucas Staff Environmental Scientist NCCP Program California Department of Fish and Game 3883 Ruffin Road San Diego CA 92123 Phone: 858 467-4230 Fax: 858 467-4299 e-mail: <u>ELucas@dfg.ca.gov</u>



GRAY DAVIS, Governor

DEPARTMENT OF FISH AND GAME http://www.dfg.ca.gov 4949 Viewridge Avenue San Diego, CA 92123 (858) 467-4201



June 9, 2003

Jon Petke The Planning Associate 3151 Airway Avenue, Suite R-1 Costa Mesa, CA 92626

Subject: Notification of Lake or Streambed Alteration Notification No. R5-2003-0139 (Fairbanks Ranch Country Club Golf Course Completion)

Dear Mr. Petke;

This letter is in response to the Lake or Streambed Alteration Notification Package (No. R5-2003-0135) that you submitted to the Department of Fish and Game (Department) for your proposed completion of the Fairbanks Ranch Country Club's golf course, located within the City of San Diego, San Diego County.

The Fairbanks Ranch Country Club's ("FRCC") project restarts construction work to complete the nine "holes" necessary to make the existing 18 holes of golf consistent with the originally approved 27-hole golf course complex, and complete the restoration of wetland/riparian habitats. The Department originally authorized the 27-hole golf course project pursuant to Streambed Alteration Agreement Notification No.V-82-311, issued on January 20, 1983. The northern perimeter of the project (i.e., the south river channel) was designed and approved for an earthen berm and rip-rap with a variable slope gradient built up to the 22-23 foot contour. It was constructed as designed along most of the realigned river, but in the area now targeted for completion of the nine holes of golf, the interim grading has built the area up to the approximate 10-14 foot level.

Project Description

FRCC purposes to complete construction of the golf course substantially as it was originally designed and authorized, with the construction of the final nine "holes" of golf. This work also includes raising the river channel berm on the northern edge of the construction site to its originally designed 22-23 foot contour level.

In completing the golf course complex, FRCC will undertake to enhance and maintain existing riparian habitat, and create new riparian habitat, using the native riparian plants prescribed by the original Landscape Concept Plan. See attached <u>Table 1</u> and <u>Exhibits D-1 and D-2</u> for the

listing and location of the existing 97 acres of riparian habitat, its status and its proposed enhancement ("use area" 1-3), and the proposal to create 12 new acres of marsh and riparian inter-connected habitat ("use area" 4 on Exhibit D-2) that is included as part of the proposed completion of the remaining nine holes of golf. The result is 109 acres of riparian habitat. The location of these wetlands is generally conforming to the original project description; however, FRCC has proposed to shift approximately 12 acres of mitigation area from the northern edge of the San Dieguito River to the south. FRCC shall annually monitor and report to the Department for five years on the status of this riparian habitat enhancement and creation undertaking.

Although not required by any project approvals nor credited as habitat mitigation by the Department, FRCC has committed to incorporate an additional 15 acres of marsh and/or riparian habitat into the nine hole golf course design ("use area" 7, 8 on <u>Table 1</u>, as depicted on <u>Exhibits</u> <u>D-1 and E</u>). Combining this with the existing 4 acres of preserved willow pond ("use area" 5) and the 19 acres of previously created lakes on the existing 18-hole golf course ("use area" 6), the overall aquatic/riparian habitat total associated with the 27-hole complex will be 147 acres. See <u>Table 1</u>.

Described in more detail below is the planned construction associated with the completion of the nine holes of golf and the planned work on the existing river channel berm.

Golf Course Construction Work

The nine hole construction project will involve clearing and grubbing, depositing additional clean fill and associated rough grading to reconfigure the construction base, and finally, finished contour grading and installation of the golf course components (tee boxes, fairways, greens, cart path, etc.). See Exhibit F for a schematic of the finished site.

Environmental Commitments:

- At a minimum, a total of 109 acres of riparian habitat will be enhanced, maintained, and created as described on <u>Table 1</u>, including 12 new acres of interconnected marsh and riparian habitat incorporated into the design of the 9-hole golf course completion ("use area" 4 on <u>Table 1</u>).
- A soft-bottom overpass structure will be created for the existing golf course cart path that currently crosses through the existing depression located in "Area 1" on <u>Exhibit D-2</u>. The will allow for a natural habitat corridor connection between the planned riparian areas in the nine hole construction area and the San Dieguito River channel.

River Channel Berm Work

The river channel berm work will involve widening the inland reach of the river's south

perimeter with an approximately ten-foot setback and raising its berm height from the existing 10-14 feet to 22-23 feet. No construction work, equipment or workers will be operating within the existing riparian vegetation. This will be accomplished by staking the upland edge of the existing riparian vegetation dripline (including any pickleweed that is part of the riparian line of vegetation). An additional 5-foot buffer will be added to this exclusion zone.

Above the 5-foot buffer, the existing berm will be widened in the upland area (*i.e.*, away from the riparian vegetation) and raised by excavating into the existing graded area down to the water line and sloping the reconfigured berm back, with additional earthen fill, to its new height of 22-23 feet. Native planting with trees and shrubs from the approved Landscape Plan will be installed to stabilize the berm slope. Subject to specific field construction opportunities, the excavated portion of the berm cut will only be partially backfilled so as to leave a "shelf" along the river's edge that will be conducive to the establishment of riparian willows and other native riparian species. See Exhibits G-1, G-2, G-3 for a series of schematics illustrating this construction work.

Environmental Commitments:

- 3. All work will be conducted above a five foot buffer measured from the 8-10 foot contour line which describes the upland edge of the river's riparian vegetation. This line will be staked and contractors will be required to keep men and equipment on the upland side of this line.
- 4. Best management practices will be employed to insure that the construction work will not result in discharges to the river. These BMPs, summarized from the SWPPP, include, but are not limited to:
 - a Vehicle and equipment service
 - b. Material delivery, handling and storage
 - c. Dust control
 - d. Sediment basins
 - e. Slope stabilization
 - f. Drain inlet protection
 - g. Spill prevention and response.
- 5. Once completed, the river side berm will be vegetated with native riparian and upland plant species from the Landscape Plan's approved plant list. See <u>Exhibit H</u>. Generally, Sand Bar Willow Thickets, Arroyo Willow Forest, and Black Willow Hummocks will be planted in the lower reaches of the river berm, and groves of cottonwood and sycamores will be planted in the upper reaches. The source plant material will include, to the extent available, seeds and cuttings recovered from the riparian species that can occasionally be found growing in upland areas away from

the existing riparian vegetation line.

- 6. All earth moving work will occur between April 15th and October 15th, 2003 (unless otherwise approved by the Department).
- On an annual basis, the FRCC will cause the removal of non-native vegetation in the San Dieguito river channel south perimeter and throughout the riparian areas of the completed 9-hole area.

In the river channel itself, the non-native plant removal will focus on hand removal of tamarisk; however, if other invasive exotic species are encountered, they will also be removed. The only equipment used in the river channel will be hand held chainsaws and other handheld tools. Removal of the tamarisk trees will be carefully undertaken in a manner to avoid, to the extent practicable, any adverse effect on the existing native riparian habitat. The tamarisk removal is scheduled to occur after September 15th of this year, but before the onset of the rainy season. If necessary due to early rains, tamarisk removal would be continued until the fall of 2004.

Enhancement activities shall comply with California Fish and Game Code Section 3503, which prohibits the take, possession or needless destruction of the nest or eggs of any bird. Therefore, unless a nesting survey is conducted by qualified biologist seven-days (or less) prior to riparian habitat enhancement activities, such activities will be conducted out-side of nesting season (March 15 through July 31). All nest sites shall be avoided until the nest is no longer active, and the young are no-longer dependent on the parent(s). A minimum 100-foot work exclusion zone will be established around an active nest by using flagging ribbon, or similar method. The work exclusion zone could be modified, based on the sensitivity of the species to human presence and activity. The Department shall be provided copies of the biologist's field notes for the nesting survey prior to commencing activities.

Construction practices common to work on both the river channel berm and the golf course construction will include pre-construction surveys by qualified biologists for nesting birds as well as any endangered or threatened species, including the least Bell's vireo among others. Construction will not commence without the advance approval of the Department in any area where nesting birds or any listed species are found. A one million dollar construction bond is posted in favor of the City of San Diego to financially guarantee the completion of the project elements, including the proposed riparian habitat enhancement and creation work described herein. FRCC will cause a post-construction monitoring report to be completed by a qualified biologist which will evaluate the effect of the environmental commitments and will make recommendations, if any are required, to address any documented shortcoming in the intended effect of the commitments. This document will be provided to the Department for review and

comment.

FRCC intends for the subject grading work to commence during June 2003. FRCC's contractor is Ranger Construction Industries, Inc. All earth moving work is scheduled for completion by October 15, 2003.

To help evaluate and monitor the success of these commitments, FRCC has given permission for site visits from any representative of the Department at any time. For safety and liability purposes, FRCC requests that the Department give as much advance notice as possible prior to visiting the site so that appropriate arrangements can be made. Please note that Department Peace Officers have authority per law to enter onto properties when they are carryout their law enforcement duties, and no statements in this letter should be interpreted to limit a Department Peace Officer's right of entry as defined by State law.

Conclusion

Based on the Department's review of the information you submitted and through a site visit (conducted by Don Chadwick of the Department), the Department has determined that a Streambed or Lake Alteration Agreement is not required for your project or activity because the project or activity 1) does not substantially divert, obstruct, or change any natural flow or bed, channel, or bank of a river, stream, or lake, or 2) use material from a streambed, or 3) substantially adversely effect existing fish or wildlife resources.

As a result, you may begin your project or activity if you have obtained all other necessary permits. If the project or activity changes from that stated in the submitted notification package above, a new notification shall be submitted to the Department.

Nothing in this letter authorizes the Operator to trespass on any land or property, nor does it relieve the Operator of responsibility for compliance with applicable federal, state, or local laws or ordinances. This letter does not constitute the Department's endorsement of the proposed project or activity, or assures the Department's concurrence with permits required form other agencies.

A copy of this letter and attachments thereto should be readily available at the work site(s) at all times during periods of active work and must be presented to any Department personnel, or personnel from another agency upon demand.

Sincerely,

4 R. Mandurak

Donald R. Chadwick Senior Environmental Scientist

Attachments:

- Table-1 Exhibit D-1 Exhibit D-2 Exhibit E Exhibit F Exhibit G-1 Exhibit G-2 Exhibit G-3 Exhibit H
- cc: Stream Alteration Compliance Team Cathy Cibit, City of San Diego

TABLE 1

SUMMARY OF RIPARIAN AREAS

The table below is a summary Project Description of the existing and proposed riparian areas associated with FRCC's proposed completion of the 9-holes of golf at its existing golf course.

Use Area Number	Area of Use	Riparian Acreage	Current Status	Project Description
1	Excavated Channel	65 <u>+</u> 1	Riparian vegetation with tamarisk and other non-native plants	Remove the non- native tamarisk.
2	Riparian Vegetation	13 (Area 'K') 6 (Area '8')	Riparian vegetation with non-native plants	Remove the non- native plants.
3	East Tributary	13	Riparian vegetation with non-native plants	Remove the non- native plants.
4	West - Water/Marsh Area (Created))	12	Rough graded; populated with non-native plants	Creation of 12 acres of water/marsh areas in the 9-hole proposed area.
RIPARIAN ACREAGE TOTAL		109		
5	Preserved Willow Pond	4	Intact.	N/A
6	Lakes (Existing)	19	Intact.	N/A
7	Wetland/Riparian Planting (Created)	12	Rough graded, populated with non-native plants.	To be created.
8	East – Water Marsh Area (Created)	3	Rough graded, populated with non-native plants.	To be created.
AQUATIC HABITAT TOTALS		147		

¹ The original 300-foot wide excavated channel has been widened to 550 feet where it turns west and has been fully vegetated. The entitlement to remove vegetation from the channel for flood conveyance purposes is neither valid any longer nor is it proposed by the applicant or the City.

From: Greer, Keith [mailto:Keith.Greer@sandag.org]
Sent: Tuesday, May 20, 2014 11:19 AM
To: Marsden, Dean
Cc: 'Lavender-Martin, Sandra E@DOT'
Subject: RE: REMP Working Group Meeting Minutes (I-5 NCC Project)

Dean – Here are the USFWS, USACE-LA and CCC emails regarding the language on temporary impacts associates with the lagoon enhancements.

Sandra can you pass along Tim Dillingham's comments and any comments from the Carlsbad USACE.

What this means for you, is that the resources agencies are not going to require that we mitigate areas of wetlands that we impact. We may not get credit, but they will not call them an impact and there will be no ratio applied to the restoration.

If you have any question please call.

Keith Greer, SANDAG 619-699-7390

From: Brown, Sally [mailto:sally_brown@fws.gov] Sent: Tuesday, May 20, 2014 11:12 AM

To: Lavender-Martin, Sandra E@DOT

Cc: aevans@dudek.com; Kosup, Allan R@DOT; awinecki@dudek.com; Jacobo, Arturo@DOT; Bryant.Chesney@noaa.gov; April, Bruce@DOT; goldmann.elizabeth@epa.gov; Buhr, Gabriel@Coastal; Greer, Keith; Smith, Kim T@DOT; Porter, Mike@Waterboards; McCaffery, Emery@DOT; Harrison, Shay Lynn M@DOT; Spencer.D.Macneil@usace.army.mil; Stephanie.J.Hall@usace.army.mil; Scatolini, Susan@DOT; susan_wynn@fws.gov; Brown, Kanani@Coastal; mcooper@scc.ca.gov; Larry.Vinzant@dot.gov; tim_dillingham@wildlife.ca.gov; Therese.O.Bradford@usace.army.mil; Meris.Bantilan-Smith@usace.army.mil **Subject:** Re: FW: Temporary Impact/Mitigation Language + REMP WKGP Structure

Subject: Re: FW: Temporary Impact/willigation Language + REMP WKGP Structure

Hi Sandra, Susan and I have no further comments, thanks for the opportunity to review!

Sally Brown U. S. Fish and Wildlife Service 2177 Salk Avenue, Suite 250 Carlsbad, CA 92008 Office: (760) 431-9440 x278 Cell: (619) 261-6027 FAX: (760) 431-5901 Sally Brown@fws.gov

From: Hall, Stephanie J SPL [mailto:Stephanie.J.Hall@usace.army.mil] Sent: Tuesday, May 20, 2014 9:58 AM To: Buhr, Gabriel@Coastal; Lavender-Martin, Sandra E@DOT; aevans@dudek.com; Kosup, Allan R@DOT; awinecki@dudek.com; Jacobo, Arturo@DOT; Bryant.Chesney@noaa.gov; April, Bruce@DOT; goldmann.elizabeth@epa.gov; Greer, Keith; Smith, Kim T@DOT; Porter, Mike@Waterboards; McCaffery, Emery@DOT; Sally_Brown@fws.gov; Harrison, Shay Lynn M@DOT; Macneil, Spencer D SPL; Scatolini, Susan@DOT; susan_wynn@fws.gov; Brown, Kanani@Coastal; mcooper@scc.ca.gov; Larry.Vinzant@dot.gov; tim_dillingham@wildlife.ca.gov; Bradford, Therese O. SPL; Bantilan-Smith, Meris SPL

Subject: RE: Temporary Impact/Mitigation Language + REMP WKGP Structure (UNCLASSIFIED)

Classification: UNCLASSIFIED Caveats: NONE

Sorry Sandra,

The Corps is also fine with the language regarding "Temporary Impact/Mitigation Language below...

-Stephanie

Stephanie J. Hall Senior Project Manager, Caltrans Liaison Transportation & Special Projects Branch USACE Los Angles District, Regulatory Division 915 Wilshire Blvd, Suite 930, Los Angeles, California 90017-3401 P: 213.452.3410 | M: 213.304.9682 | F: 213.452.4196

Assist us in better serving you! You are invited to complete our customer survey, located at the following link: http://corpsmapu.usace.army.mil/cm_apex/f?p=regulatory_survey

From: Buhr, Gabriel@Coastal [mailto:Gabriel.Buhr@coastal.ca.gov]

Sent: Tuesday, May 20, 2014 8:07 AM

To: Lavender-Martin, Sandra E@DOT; aevans@dudek.com; Kosup, Allan R@DOT; awinecki@dudek.com; Jacobo, Arturo@DOT; Bryant.Chesney@noaa.gov; April, Bruce@DOT; goldmann.elizabeth@epa.gov; Greer, Keith; Smith, Kim T@DOT; Porter, Mike@Waterboards; McCaffery, Emery@DOT; Sally_Brown@fws.gov; Harrison, Shay Lynn M@DOT; Spencer.D.Macneil@usace.army.mil; Stephanie.J.Hall@usace.army.mil; Scatolini, Susan@DOT; susan_wynn@fws.gov; Brown, Kanani@Coastal; mcooper@scc.ca.gov; Larry.Vinzant@dot.gov; tim_dillingham@wildlife.ca.gov; Therese.O.Bradford@usace.army.mil; Meris.Bantilan-Smith@usace.army.mil Subject: RE: Temporary Impact/Mitigation Language + REMP WKGP Structure

Both look fine to me Sandra.

Coastal Program Manager

On Tue, May 20, 2014 at 7:58 AM, Lavender-Martin, Sandra E@DOT <<u>sandra.lavender@dot.ca.gov</u>> wrote:

Good Morning Everyone!

Just following up to see if anyone has any comments on the attached REMP Structure and/or the Temporary Impact Language below. To date, I have only received comments from Tim. Please provide any comments by this Thursday COB, so that these items can be finalized.

Thank you,

Sandra

From: Lavender-Martin, Sandra E@DOT

Sent: Monday, April 28, 2014 3:44 PM

To: 'aevans@dudek.com'; 'allan_kosup@dot.ca.gov'; 'awinecki@dudek.com'; 'arturo_jacobo@dot.ca.gov'; 'Bryant.Chesney@noaa.gov'; 'bruce_april@dot.ca.gov'; 'goldmann.elizabeth@epa.gov'; 'gbuhr@coastal.ca.gov'; 'kgr@sandag.org'; 'kim_t_smith@dot.ca.gov'; 'mporter@waterboards.ca.gov'; 'emery_mccaffery@dot.ca.gov'; 'Sally_Brown@fws.gov'; 'shay_lynn_harrison@dot.ca.gov'; 'Spencer.D.Macneil@usace.army.mil'; 'Stephanie.J.Hall@usace.army.mil'; 'susan_scatolini@dot.ca.gov'; 'susan_wynn@fws.gov'; 'kbrown@coastal.ca.gov'; 'mcooper@scc.ca.gov'; 'Larry.Vinzant@dot.gov'; 'tim_dillingham@wildlife.ca.gov'; 'Therese.O.Bradford@usace.army.mil'; 'Meris.Bantilan-Smith@usace.army.mil' **Subject:** Temporary Impact/Mitigation Language + REMP WKGP Structure

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Hello Everyone,

The proposed temporary impact/mitigation language for the REMP is below. The poposed structure for the REMP Working Group has been revised to include all edits received to date. Please review both and provide comments by Tuesday, May 6th.

Temporary Impact/Mitigation Language

Implementation of Resource Mitigation and Enhancement Program (REMP) as outlined in the NCC Public Works Plan will result in some temporary impacts to low quality wetlands, such as disturbed wetlands and non-tidal salt marsh, to re-establish, restore, and enhance high quality tidal and freshwater wetlands. Any potential impacts resulting from the re-establishment, restoration, and enhancement will be identified in the site specific HMMPs. No additional mitigation would be required for these temporary impacts as long as there is a net benefit or a significant increase in quality and function of the re-established/restored/enhanced wetlands. If any portion of the mitigation site fails to meet its success criteria under the HMMP, no credits would be released and mitigation for temporary impacts maybe required at that time.

Thank you, Sandra

Sandra Lavender-Martín

Associate Environmental Planner Department of Transportation - District 11 Environmental Stewardship/Ecological Studies Branch P: (619) 688-0115

CITY OF SAN DIEGO EL CAMINO REAL ROAD/BRIDGE PROJECT AGENCY COORDINATION MEETING SUMMARY APRIL 4, 2005

AGENCY REP	AGENCY REPRESENTATIVES AND INTERESTED PARTIES (in alphabetical order)							
NAME	AFFILIATION	PRESENT?	PHONE	E-MAIL				
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Edgar Camerino	Rick Engineering	No	619-291-0707	ecamerino@rickengineering.com				
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			x11					
Lisa Cathcart- Randall	FHWA	No		Lisa.cathcart-randall@fhwa.dot.gov				
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Libby Lucas	CDFG	Yes	858-467-4230	elucas@dfg.ca.gov				
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AGENCY REPRESENTATIVES AND INTERESTED PARTIES (in alphabetical order)

NAME	AFFILIATION	PRESENT?	PHONE	E-MAIL
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Gary Vettese		No	858-616-6523	Gary_Vettese@dot.ca.gov

DISCUSSION SUMMARY

- 1. The objective of the meeting was to follow up on questions and concerns communicated by the permitting agencies on the City's preferred mitigation site, which is the former Boudreau site purchased by the JPA (herein referred to as the "JPA site").
- 2. Clarifications to the February 28, 2005 agency coordination meeting notes and additional comments were received from CDFG and the USFWS, as summarized below.

Libby Lucas with CDFG stated in a March 2, 2005 e-mail that CDFG generally agrees with the proposed mitigation ratios. However, she requested clarification on the definition of "restoration," stating that for CDFG "to consider whether restoration alone or a restoration/creation mix would meet the no-net loss requirement, we would need to know the details of the proposal." She also noted that if the term "coastal wetlands" includes the clapper rail habitat to the east of the bridge, "the proposed 4:1 creation for the loss of clapper rail habitat will be acceptable to DFG, as will be the 1:1 creation plus 3:1 enhancement (i.e., removal for non-native invasive species from the riparian area)."

In a subsequent letter to the City e-mailed on March 24, 2005, CDFG made the following additional comment on the February 28, 2005 meeting notes: "The minutes correctly reflect that CDFG indicated that the proposed 4:1 mitigation is higher that we usually see for the loss of coastal wetlands. What I meant to say is that 4:1 <u>creation</u> is higher than we usually see. City of San Diego requires 4:1 for coastal wetlands, but does not specify that it all be creation. As we have said in a previous e-mail, we agree with the 4:1 creation for the loss of habitat that supports the clapper rail." This letter also posed additional questions regarding the Polo Club fields as a mitigation site. These questions were the focus of the April 4, 2005 meeting.

John DiGregoria with USFWS stated the following in a March 23, 2005 e-mail: "A couple of notes from your minutes. The Service stated that there will likely be no direct injury or kill from construction equipment. However, the permanent removal of occupied habitat will constitute "take" from harm (loss of occupied habitat) and we will need to go through formal consultation with the project. The Service also supports the CDFG position regarding the Polo Fields and any outstanding issues regarding the Polo Fields needs to be closed before we move forward with this project."

- 3. The feasibility of the alternative alignments that affect the western edge of the Polo Club Fields leasehold was discussed. The alternatives for the road are feasible because the lease specifically allows the City to build a road and to have other utility easements over and across the property. However, taking land for mitigation is not specifically allowed in the lease, so this action would have to be negotiated separately. The lease is for 26 years. It started in 1986 and runs to the end of 2012. The lease does not include language regarding implementing mitigation on the property referenced in the 1981 Fairbanks Country Club EIR prepared for Watt Industries, the property owner at the time. A Corporation Grant Deed transferred the property to the City on October 24, 1983. The City noted that mitigation never being implemented on the Polo Club fields for the 1981 project is a code enforcement issue, and the City will investigate this issue. It was agreed by CDFG that mitigation for El Camino Real and mitigation for the 1981 Fairbanks Country Club project are two different issues. CDFG also concurred that if the road is in the lease, then the road alignments affecting the property are feasible.
- 4. Potential actions by Polo Club if part of the property were taken for the road and for mitigation were discussed. Caltrans emphasized that it is speculation to predict any actions on the lessee's part, and the environmental document will not speculate. City Real Estate Assets stated that with only 7 years left on the lease, it is not likely that the lessee would go to the expense of obtaining the private property to the north in order to continue operations.
- 5. Demolition of the existing bridge was discussed. CDFG suggested leaving the pier walls of the existing bridge in place if the Eastern Alignment Alternative, with the completely separate new bridge, is selected. The hydraulic effects of the existing bridge and other components of the river system in this location, including the rip rap blanket and existing bridge abutments, must be analyzed. USFWS noted the rip rap blanket has helped establish the emergent marsh, which is attractive to the clapper rail. The hydraulic

analysis must determine if steepening the abutments as proposed would be detrimental to the hydraulic system that supports the clapper rail. The project description must include how and when the existing bridge would be demolished. CDFG noted that we must balance river functionality with the clapper rail requirements.

6. The biological suitability of the JPA site and the Polo Club site for clapper rail mitigation was discussed. The project biologist read the following from a government annotated bibliography about clapper rail written by Dick Zembal, former USFWS expert:

"The light-footed clapper rail is non-migratory. Once established on a territory, the birds stay throughout the year and from year to year.

Local wandering, however, has been documented, with sightings of rails in winter, sometimes far inland. Whittier Narrows, 32 km from the coast, and Walnut Canyon Reservoir (Nohl Ranch Lake), 23 km from the coast, are the farthest inland sites documented thus far. The most probable explanation for winter dispersal is that young birds must seek their own territories, once the family unit breaks up at the end of breeding season."

- 7. Coastal Commission policy regarding mitigation for impacts in the Coastal Zone was discussed. The City's Local Coastal Program requires impacts in the Coastal Zone to be mitigated in the Coastal Zone. However, the Coastal Commission noted that state coastal requirements would be the review standard in the project area, not the City's Local Coastal Program. The Coastal Commission said that if there is biological benefit to mitigating outside of the Coastal Zone, they would consider such a plan.
- 8. Potential impacts to the JPA trail that is currently on the north bank of the river were discussed. If mitigation were on the Polo Club site, allowance for at least a 100-foot buffer would have to be made in addition to the width of the mitigation area. JPA noted moving the trail as far north as the property line between the private property and the Polo Club field property could be a problem for their Coast to Crest trail alignment. However, they do not have a set trail alignment east of the bridge, because they must still address how to go through the Morgan Run area.
- 9. Potential legal issues associated with implementing mitigation on the Polo Club site were discussed. Caltrans noted that they generally cannot condemn for mitigation land, and they must prove necessity. In this case, since the JPA site is also considered feasible, it would be difficult to prove necessity for using the Polo Club site.
- 10. USFWS and CDFG concluded that neither agency has the authority to require the City to select a particular mitigation site if several are adequate. If it can be demonstrated that emergent marsh can be established on the JPA site, then that site is acceptable for mitigation for El Camino Real Road/Bridge Project. Hydrologic feasibility is related to the depth of groundwater on the site, and the ability to connect to the river without affecting river hydraulics.

11. The City will pursue having borings drilled on the JPA site to determine the existing groundwater level. The City will have Dr. Chang develop and analyze a river connection. The City will also have Dr. Chang evaluate the hydraulic conditions that would occur if the existing bridge were left in place and a new bridge built to the east. Results of the feasibility and hydraulics analysis will be reported in future e-mail correspondence.

NOTE: These minutes are the preparer's understanding of the items discussed at the meeting. If discrepancies are noted, please contact the preparer within five working days of receipt.

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khon@honconsultinginc.com
Attendees and Interested Parties
April 26, 2005

CITY OF SAN DIEGO EL CAMINO REAL ROAD/BRIDGE PROJECT AGENCY COORDINATION MEETING SUMMARY MARCH 14, 2007 DISCUSSION SUMMARY

A. FAIRBANKS RANCH GOLF COURSE

- A.1 A new Streambed Alteration Agreement was not required by CDFG for the golf course expansion in 2003. Ponds in the golf course covering approximately 12 acres were agreed upon as mitigation that addressed the 109-acre obligation that was originally shown as being north of the river at Polo Field. CDFG does not believe the ponds that were built are consistent with the agreed-upon configuration, as the ponds are set back from the river. However, it is CDFG's responsibility to enforce this issue.
- A.2 Apparently, 13 acres of mitigation were exchanged for revegetation of an area upstream designated as "Area 3." Agency documentation is not clear on when or how this occurred; CDFG is exploring this issue further.
- A.3 CDFG and USFWS are concerned about temporal loss because of the delay between impacts that occurred in 1981 and the mitigation that was constructed in 2003. However, it is not clear if temporal loss was a consideration in the agreements made with CDFG regarding the project in the 1980's. USFWS did not assume jurisdiction at that time.
- A.4 There is also a maintenance requirement for the golf course to remove invasives in the river from El Camino Real Bridge to 3,000 feet upstream for 5 years. This activity may be occurring at the wrong time of year.

B EL CAMINO REAL MITIGATION SITE

- B.1 CDFG's primary concerns are that the proposed mitigation concept is a contrived and artificial wetlands system. They want to explore more in-river riparian creation and enhancement. They want to focus on optimizing the natural system along the banks of the river and removal of invasives. They are concerned about the possibility of the clapper rail not utilizing the proposed mitigation site. However, it was recognized that there is potential benefit of having an off-system "refuge" for the clapper rail because of the potential for the population to be displaced or decimated by a big flood event.
- B.2 Ideas from CDFG for alternative mitigation concepts that could be added to the EIR include the following:
 - Long-term invasive species removal using appropriate techniques
 - Riparian creation along the north bank of the Polo Field
 - Laying back upland slopes and creating brackish to freshwater marsh in other areas further upstream
 - The above combined with a downscaled version of the proposed mitigation concept
- B.3 In response to specific questions, USFWS noted they would not accept out-of-kind mitigation for brackish marsh impacts. USFWS also noted they would identify bridge

shading impacts as permanent, unless there was a special study clearly demonstrating that a bridge would be high enough to allow sufficient light for habitat to grow.

- B.4 According to Caltrans, FHWA would not participate in a higher cost mitigation program if a lower-cost solution exists.
- B.5 Caltrans noted there may be some federal participation allowed in a long-term maintenance program.
- B.6 Mitigation ratios would be lower if the mitigation were in place before the impacts occurred. The City would consider ways to construct the mitigation before starting the road and bridge construction.

C. EIR COMMENTS

- C.1 The City is confident the existing bridge would not cause hydraulic problems for the new bridge as proposed for the Eastern Alignment. However, based on comments made at meetings and the letter the JPA wrote on the Draft EIR, the JPA now does not favor taking responsibility for the existing bridge if it were retained as part of the Eastern Alignment. Five other comment letters on the EIR also noted the existing bridge should not be retained. Therefore, the City will propose an option for the "Modified Eastern Alignment" to demolish the existing bridge when construction is completed.
- C.2 The hydraulic experts agreed that the existing bridge does not affect the low flows in the river. The river flows bank to bank from the 10-year flood. Higher flood events overtop the banks.
- C.3 Additional text should be added to the discussion of potential clapper rail impacts in the EIR. The possible impacts should be identified, considering the bird is in the river year-round. Methods to minimize impacts should be listed, for example, noise attenuation measures, and exclusion fencing.

ACTION ITEMS

- Beth will arrange a separate meeting with the agencies and Fairbanks Ranch CC representatives to discuss their issues.
- Consultants will develop mitigation alternatives to show to the agencies at a follow-up El Camino Real meeting.
- Tierra will draft text regarding potential clapper rail impacts for agency review.
- City will arrange a follow-up meeting with the agencies.

El Camino Real Road/Bridge Widening

Bridge Construction Methodology & Associated Noise Reduction Measures, and Biological & Hydraulic Impacts



Nordby Biological Consulting

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PROJECT BACKGROUND

The City of San Diego (City) proposes to modify the segment of El Camino Real between Via de la Valle and San Dieguito Road in order to improve the structural integrity of the vehicular bridge over the San Dieguito River, alleviate problems associated with high flood events, improve pedestrian and vehicular access to nearby coastal and recreational resources, relieve traffic congestion, and improve consistency with the adopted land use plan for the project area.

The project area is in the northwestern part of the City of San Diego. The City of Del Mar is to the west, the Fairbanks Ranch Country Club development within the City of San Diego is to the east, and County of San Diego lands are to the north. The road being modified is El Camino Real from Via de la Valle on the north to San Dieguito Road on the south. This portion of El Camino Real, classified as a 2-lane collector, is approximately 2,400 feet long, 23 feet wide, has one travel lane in each direction, and has no shoulders, bike lanes, or pedestrian walkways. The road segment includes a bridge over the San Dieguito River that is 340 feet long and 27 feet wide. The San Dieguito River crosses under El Camino Real approximately 1,500 feet south of Via de la Valle.

In this location, El Camino Real would be inundated during a 100-year flood at several low points north of the river. Although the bridge surface would not be inundated, the 100-year flood level would rise to the bottom of the bridge deck, so there is not adequate room to allow debris to pass under the bridge. Also, the bridge is not structurally adequate for the local seismic conditions, because the piles are relatively shallow and buried in sediments that could fail in an earthquake due to liquefaction. In addition, this segment of El Camino Real is subject to severe congestion during peak travel times. The segment of El Camino Real included in the project currently operates at Level of Service (LOS) F at peak hours, reflecting congested traffic conditions. The proposed improvements include raising and widening El Camino Real roadway and replacing the bridge with a structure that is higher, wider, and has deeper piles.

Modifications to Via de la Valle from El Camino Real on the west to El Camino Real North on the east are also part of this project. This segment of Via de la Valle also operates at Level of Service (LOS) F. Most of this segment would need to be widened for appropriate transitions from widened El Camino Real.

Multiple build alternatives have been studied for this project, but for the purpose of this report, the focus will be on the Eastern Alignment Alternative.

EASTERN ALIGNMENT

Full widened roadway cross section with an alignment shifted east to allow independent construction of the new bridge, minimize impacts to developed properties along the western side of El Camino Real (Horsepark and Mary's Tack and Feed), and reduce impacts to wetlands in the drainage ditch parallel to the eastern edge of El Camino Real. The alignment for this alternative would be shifted eastward to where the toe of the new road's western embankment would tie in along the existing Polo Club fence. For this alternative, the roadway would be raised above the 100-year flood level on embankment.

PURPOSE

The purpose of this report is to discuss the following:

- Construction methodologies of the proposed bridge;
- Noise Reduction Measures during construction;
- Biological Impacts due to bridge construction; and
- Hydraulic Impacts during construction.

CONSTRUCTION METHODOLOGY

Temporary Berm Option

<u>Overview</u>

The option for utilizing a berm for construction the El Camino Real Bridge replacement is for a

Contractor to build a temporary berm that would provide a working pad area approximately 30 feet east of the new east edge of deck to approximately 30 feet west of the new west edge of deck of the bridge. The total width of the berm would vary based on the height of the fill placed. It would extend from the north bank to the south bank of the San Dieguito River, with openings (culverts or bridge crossings) for low flow channels as required for hydraulics. Using the berm and the embankment, the Contractor will construct the pile, columns, place temporary falsework, and for the construction of the superstructure of the bridge. Upon completion of the bridge, the Contractor will deconstruct the falsework, and remove the berm material from the river.

Once the bridge construction is done, the berm material will remobilize the same materials to the west side of the new bridge to construct a berm to be used for the demolition of the existing structure. This berm will also need to provide a 30' working pad on each side of the existing bridge. This document is intended to provide an explanation of construction, and impacts, of the steps required to:

- Construct and deconstruct a berm
- Construct and deconstruct falsework
- (Includes skeletal description of building columns and the bridge superstructure)
- Demolish the existing bridge

Constructing the berm

- Contractor will mobilize heavy equipment to include a large dump trucks, bulldozers, front-end loaders, and excavators. It is expected that multiple quantities of each piece of equipment will be used.
- Contractor will mobilize substantial amounts of dirt, and large 1-2 ton angular rock near berm location with large dump trucks. Depending on the source and availability of material, the Contractor may be able to run a continuous import operation without a temporary staging area near the berm location.

- Prior to the operation beginning, the Contractor will identify the area within the River that will be impacted by the berm and place an impermeable barrier along the perimeter to avoid an increase in turbidity while the berm is being constructed. This barrier may be in the form of floating tubes with plastic sheeting hanging down and weighted at the bottom to prevent significant tidal water from passing through the impacted area.
- Contractor will utilize a bull dozer to grade the area along embankment where the berm will be located.
- Contractor will place geotextile, plastic sheeting or other impermeable material along the footprint of the berm starting at the embankment, above the high water mark, and working outwards into the river, perpendicular to the shoreline.
- The Contractor will start placing the dirt at the shoreline on top of the impermeable material and work outwards into the river. Along the perimeter of the berm the Contractor will place 1-2 ton rock as a protective barrier for the soil material.
- An operation using a dump truck, dozer and excavator will move the soil and 1-2 ton rock outwards from the shoreline onto the impermeable material.
- As the berm is constructed, the excavator will move out onto berm. The dozer or frontend loader will move material onto the constructed berm to allow the excavator to pick and place material.
- The impermeable material will be incrementally placed ahead of soil and rock-placing operation.
- The Contractor will establish openings in the berm as required to allow the river to flow. Openings may be constructed of multiple corrugated metal pipes (CMP) placed perpendicular to the alignment of the berm. Annular space between CMPs will be filled with dirt and plates will likely be placed over the CMPs. An alternative is for the Contractor to build a small bridge made of steel stringers and steel plates or timber decking material to span the opening(s).
- The width of the berm may vary to accommodate locations where outriggers for Contractor's cranes or concrete pumps may be placed.

Notes:

- The Contractor can complete construction of each abutment for the permanent structure concurrently while constructing the temporary berm.
- Upon completion of the temporary berm, the Contractor can begin construction of the Cast-In-Drilled Hole (CIDH) piles, the columns for the permanent structure, and the temporary falsework for the bridge.

Constructing large CIDH piles for columns

- Upon completion of the berm, the CIDH piles can be placed. Note: With the allowance of the placement of a significant amount of fill material in the River, the Contractor should not need to create cofferdams in order to construct the CIDH piles for the columns. Other

options may be available to the Contractor with the placement of the large temporary berm, such as enlarging the berm around the pile locations or placing a large diameter casing at each column location, essentially creating a temporary cofferdam.

- Piles will be constructed using a large drill rig, large crane, front-end loader, Baker tanks for drilling fluid storage, dump trucks for spoil removal, and other typical construction equipment. It is expected that 3 WMBD Alt 2C Large Berms the drilling will be done under drilling fluid, or slurry, or with the use of a full length temporary casing, based on the water level expected at the side.
- It is expected that a steel casing will be used to stabilize the top of the drilled shaft at each location, and although typically called a temporary casing, it is typically left in place. This casing could be as deep as 30' depending on the soil parameters found.
- Concurrently with constructing the berm, ironworkers will be building the steel cage for the CIDH piles and columns. Depending on availability of space, the pile and column cages may be built on the berm. If space is not available, the cages will be constructed in the Contractor's staging area near the embankment. In either scenario, reinforcing steel will be mobilized to the site by means of semi-trailers and off-loaded with the use of a large crane.
- The Contractor will construct the CIDH pile foundation by drilling through the berm, placing a casing and/or drilling slurry to maintain the hole, placing the pre-fabricated steel cage into the hole and pumping the required concrete mix into the drilled shaft while holding the steel cage and casing in place with other large cranes. As the level of the concrete rises, the casing used to maintain the drilled hole will be raised simultaneously to avoid excessive head pressure.
- This operation will be repeated to construct the required number of columns.
- Upon completion of each pile, the Contractor can begin construction on the columns for the bridge.

Constructing temporary falsework from the berm

Note: There is a possibility that no piles would be needed if the berm was stabilized during

construction and can support the load from the falsework on spread footings. This would be up to the contractor during their falsework design process. This could possibly eliminate the need for any driven piles. For the purposes of this study it will be assumed that the Contractor cannot stabilize the foundation for the falsework and that piles are required. Falsework on a spread footing foundation is a best case scenario and falsework on piles is worst case.

- At the face of each abutment the Contractor will place a short falsework bent, likely constructed of wooden corbels, a 12X12 sill beam and 12X12 posts, and a 12X12 cap beam.
- Starting on the north end of the structure the Contractor will drive temporary steel piles through the berm to create a foundation for a falsework bent. Falsework piles will likely

be 20" diameter steel shell piles. This will be accomplished by staging the pile driving rig on the berm or on the embankment near the abutment. (Subsequent piles will be driven with the pile rig on the berm.)

- A steel pile cap will be placed on top of the driven piles, by use of a crane, and secured by welding or other mechanical connection.
- Steel or wooden falsework posts will be placed on top of the steel pile cap, by use of a crane, and secured by welding or other mechanical connection.
- A steel cap beam will be placed on top of the falsework posts, by use of a crane, and secured by welding and/or mechanical connection. **This completes one falsework bent.**

Note: The use of one large berm creates a working platform for constructing falsework and allows for ease of access for laborers.

- Alternatively, the Contractor may elect to pre-fabricate the falsework bents in the staging yard, mobilize them on site with semi-trailers and put them in place by use of a crane staged on the berm.

Because stability of falsework bents is critical, it is likely that once the Contractor completes two adjacent falsework bents the Contractor will place multiple steel stringers across the span, connect them to each bent and create a frame.

- This same sequence is repeated until all falsework bents and stringers are constructed. Access to the connection of stringer and cap beam can be obtained from the berm by use of a basket or cherry picker.
- There are a number of concurrent operations that can occur while the falsework bents are being constructed and stringers are placed. The ability of a Contractor to work concurrent operations is dependent on the availability of equipment, labor and materials.
- Once steel stringers are placed the Contractor will build a platform of 4x4 timbers and plywood on top of the stringers. The soffit of the bridge will be poured on this platform.
- Placement of stringers and remaining falsework items, and steel and concrete for the stem, soffit and deck construction will occur from the berm. This will require semi-trailers to access the embankment and deliver materials to the berm by either driving onto the berm or staging on the embankment and being off-loaded by a large crane.

The number of piles (if used) in a falsework bent and the number of falsework spans is to be determined by the Contractor. However an estimate of the typical spacing of piles is as follows: 1 falsework bent every 40' max, with piles spaced at 5' on center measured transversely to the bridge.

Constructing superstructure

- Once falsework is complete, construction of the superstructure of the bridge can commence.
- Delivery of forms, reinforcement steel and concrete will be from the berm and from the abutment locations.

- Concrete pumps will be staged at the abutments and on the berm. Concrete trucks will deliver concrete to the pump on the berm by accessing the berm.

Deconstructing the falsework

- Upon completion of bridge construction the Contractor will deconstruct the falsework in an opposite manner in which it was constructed.
- The falsework design and construction will include jacks, wedges, and pulleys that allow the Contractor to separate the platform and steel stringers from the bottom of the soffit after the bridge is prestressed.

Note: The use of the berm creates a working platform for removing falsework and allows for ease of access for laborers and welders, as well as demobilization of materials.

- Combining access from on top of the newly constructed bridge and the berm, the Contractor will remove the 4x4 platform and stringers.
- Working on the berm the Contractor will deconstruct each falsework bent and move material to the embankment.
- Removal of the falsework piles (if used) will be constrained vertically due to the construction of the new bridge. Permit requirements may dictate a number of options, to include:
 - 1) The contractor may leave piles in place but cut the top of the piles to the low water elevation.
 - 2) The Contractor must cut off the top of the piles down to 2 feet below the original riverbed. This may require the Contractor to dewater and/or divert the river away from the area where the piles will be cut, dig around each pile to 2 feet below riverbed and cut piles.
 - 3) The Contractor must remove all piles full length. This will be challenging for Contractors and force them to mobilize special equipment under the structure, raise each pile a certain length and cut off the portion above water. This operation will likely be the most expensive and time consuming of the options listed.
- Once all falsework material is removed it will be placed in the staging area in preparation for the next phase of construction.

Demolishing the existing bridge

- The construction of a temporary berm allows for ease of demolition of the existing structure.
- The Contractor will mobilize crews onto the temporary berm on the side of the existing bridge in order to facilitate demolition and removal of the concrete deck, beams and pier walls. It is likely that the combined access from the berm and the deck of the existing structure will be utilized to remove the deck and beams.

- With the berm acting as a barrier and preventing demolished concrete, steel and debris from falling into the San Dieguito River, the Contractor can mobilize demolition equipment onto the berm, demolish each pier and collect the material on the berm.
- It is proposed that the contractor would remove existing pier walls 2 feet below the original riverbed, leaving footings and piles below in place. This will be the least impactful and more feasible scenario.
- Demolished concrete, steel and other material will be mobilized off site by accessing the berm.
- Contractor will reestablish the existing conditions at each pier location and demobilize from the site. Repairs to the protective rock mat may be needed where the pier walls were removed.

Deconstructing the berm

- Upon completion of bridge construction the Contractor will deconstruct the berm in an opposite manner in which it was constructed.
- An operation of a dump truck, dozer and excavator will demobilize the soil, 1-2 ton rock, and the CMPs (or bridge) from the end of the berm towards the shoreline.
- The excavator will remove the material and place it into the bed of large dump trucks.
- A succession of large trucks will travel along the constructed berm and move the material off-site. Multiple trucks will be required to maintain a continuous operation.
- As the impermeable material is exposed it will be lifted out of the water and rolled up onto the end of the berm.
- This operation will continue until the berm is deconstructed to the embankment.
- Upon demobilization of the berm, the Contractor will deconstruct the turbidity barrier.
- The Contractor will restore the embankment area in accordance with permit requirements.

Trestle Construction Option

General:

- Typical width 30'
- Side trestle needed at each pier location. Assume 3 bents at 25' spacing, overall dimension = width of the structure x 50 ft.
- Extend trestle full length across San Dieguito River
- Temporary piles will be driven for trestles using impact and vibratory hammers.
- Temporary piles for trestles can be removed using a vibratory hammer.

Construction process:

- Grade slope for crane access at abutment, set abutment foundation for trestle.
- Drive piles at 35' away from abutment. It is assumed a combination of vibratory hammer and impact hammer will be used to drive the piles. Spacing of piles will be roughly 4' to 5'. Approximately 6 or 7 piles will be needed at each bent. Workers will be required to access the bent location by boat or other means in the riverbed to set up driving template, to cut piles to height, to set cap beam, set beams, etc.
- Set transverse cap beam on top of row of piles. Connect to piles.
- Set longitudinal beams from abutment to first bent. 9 or 10 W24x117 or similar sized beams will likely be used in each span. Place lateral bracing for beams.
- Place crane pads or timber decking on beams.
- Drive crane and pile driving hammer and leads to the first bent.
- Repeat #2 to #6 above all the way across the river.

<u>At Piers:</u>

- From trestle, drive 3 rows of piles 25 feet apart, at similar spacing transversely, to the opposite side of the bridge. Pile spacing will be controlled by CIDH pile equipment loads.
- Set cap beam on top of row of piles. Connect to piles.
- Set beams between bents. Place lateral bracing for beams.
- Place crane pads or timber decking on beams.
- Use this 50' wide area to access the pier for drilling CIDH piles, constructing columns, etc.

Bridge Falsework Construction:

Falsework will be used to construct the new bridge superstructure. See El Camino Real Berm Construction Description document for detailed description of the bridge falsework and bridge construction. When no berm is used, the falsework will need to be placed on driven piles.

Demolition of existing structure:

Demolition of the existing structure could be done using a berm or trestle. This document will discuss the use of a trestle. See El Camino Real Berm Construction Description document for description of the use of a berm to remove the existing structure.

Demolition of existing structure using a trestle:

- A temporary trestle will be required to provide access for demolition of existing bridge.
- Trestle for demolition would be as complex as trestle built to construct the bridge, however it won't need to be as wide.

- Use of a trestle for demolition will require a netting system (or equivalent) supported from the trestle and existing piers to prevent debris from dropping into the San Diego River during demolition.
- Upon completion of the demolition of the existing superstructure, an additional trestle will be required to provide access to drive sheet piles around existing piers to facilitate partial removal of the substructure below grade.

Other Considerations during construction:

- Temporary turbidity barrier will need to be installed around the trestle prior to the start of pile driving. At least one opening on each side should be provided at main flow area to allow main river flow easy flow up and down stream.
- Elevation of the bottom of the trestle should be set above a significant flood elevation, to prevent it from being impacted in case of flood. Hydraulic analysis will be necessary to determine this elevation.
- Falsework piles will be driven from the temporary trestle.
- Pile spacing and span lengths will be controlled by the largest load on the trestle, likely the CIDH pile drill and the crane used when setting the rebar cage for the CIDH piles.

Removal of trestle:

- Remove decking from beams.
- Remove beams with crane sitting on adjacent span.
- Remove cap beams. Access to trestle bents by boat or other means in the riverbed will be needed for workers to cut welds, rig crane, etc.
- Using vibratory hammer, remove piles with crane sitting on adjacent span.
- Remove turbidity barrier by boat or other means in the riverbed.

Other Considerations:

- Removal of the piles will create a swelling of soil around the pile as it is pulled out that could be on the order of 2' to 4' high, depending on the cohesion properties of the soil. There will be a hole at the pile location as well. Depending on the type of material, it could collapse and fill itself in, or remain open for a long period of time.
- Falsework piles will be needed for this option for certain. For the berm options, it will depend on the capacity of the material placed in the channel and the underlying material. It is possible that falsework piles will be needed for the berm options as well.
- Removal of the falsework piles is limited in the trestle option by the elevation of the trestle because the equipment must work from the trestle. In the berm options, the removal is still limited, but possibly less so if the berm elevation can be lower than the elevation of the trestle. This could be done during the berm removal to allow greater headroom for pile removal.

NOISE REDUCTION MEASURES

A combination of the following methods may be used to reduce noise levels associated with construction:

- Timing and duration of operations was adjusted so that the required average hourly noise levels could be met. Noisy operations were only done intermittently during any given hour.
- All backup alarms were disconnected on manlifts and large equipment, and spotters were used around this equipment for safety purposes.
- Noise dampening panels were used to block the sound from the sensitive habitat areas. Sometimes this was just a sheet of plywood. Other times during operations like the bridge demo, these panels were large (8'x16') and insulated with noise dampening insulation. Multiple panels were used during many operations. These were used around stationary equipment such as light plants, locations used for sawing, and were supported on a forklift and moved around for mobile operations such as the bridge demolition.
- Noise monitoring was done daily during the breeding season and nightly during potentially noisy operations to monitor the noise levels and mitigation measures were adjusted as necessary during the operations.
- Typically propped into place around the equipment, leaned up against it. They put some up on the handrail around the bentcaps, and occasionally tied to the sides of the manlifts they were working from. The large ones were hung from a forklift.

PROPOSED METHODS TO AVOID AND MINIMIZE IMPACTS TO BIOLOGICAL RESOURCES

General

- Staging and equipment storage areas, and equipment maintenance will be located outside of the river corridor;
- A qualified biologist will train construction crews (including utility personnel) to avoid unnecessary impacts to the biological resources by briefing them on resource protection measures;
- Prior to the start of construction, a qualified project biologist will supervise installation of orange construction fencing or equivalent along the limits of disturbance within and surrounding sensitive habitats as shown on the approved construction plans. Temporary fencing will be removed after project completion.
- The project biologist will monitor all phases of construction to minimize impacts on sensitive species, check that wildlife is not entrapped, verify that the boundary fencing is maintained in good condition, and ensure that construction activities do not encroach into biologically sensitive areas beyond the approved limits of construction.

- A wildlife corridor will be maintained during all construction within the river corridor during non-breeding season. The wildlife corridor will consist of a spanned low flow channel of the river, approximately 40 feet wide. Orange construction fencing will be installed parallel to the low flow channel to discourage wildlife from accessing the construction areas approved in the plans.
- Construction lighting in upland areas will be the lowest illumination necessary, and directed away, or shielded from the river corridor
- The project site will be kept as clean of debris as possible to avoid attracting predators of sensitive wildlife. All food-related trash items will be enclosed in sealed containers and regularly removed from the site.
- Pets of project personnel will not be allowed on the project site.
- Disposal or temporary placement of excess fill, brush, or other debris will not be allowed in Waters of the U.S. or within their banks.

Light-footed Clapper Rail. Light-footed clapper rails have been documented both east and west of the existing ECR bridge. In order to avoid impacts to this species the following measures are proposed:

- No construction will occur within the river corridor during the clapper rail breeding season (February 15 September 15);
- Noise from construction activities outside of the river corridor will not exceed 60dBA (1-hour) at the river corridor (or ambient, whichever is greater) during the light-footed clapper rail breeding season. If the noise limit is exceeded, the noise will be reduced by using temporary noise measures such as plywood barriers, equipment mufflers, or sound blankets;
- Outside of the breeding season, construction in the river corridor will be limited to daylight hours. No temporary lighting will be installed for construction at night;
- Prior to beginning construction at the end of the clapper rail breeding season (September 15) all vegetation within the approved limits of disturbance will be removed to eliminate the potential for rails to seek vegetative cover. The project biologist will monitor vegetation removal activities to avoid impacts to rails during this process. Should any rails be detected in the limits of disturbance, vegetation removal activities will be halted temporarily while the project biologists flushes the rail(s) from the area to be cleared into existing emergent vegetation west of east of the bridge;
- A wildlife corridor will be maintained during all construction within the river corridor during non-breeding season to allow east/west movement by rails. The wildlife corridor will consist of a spanned low flow channel of the river, approximately 40 feet wide. Orange construction fencing will be installed parallel to the low flow channel to discourage clapper rails from accessing the construction areas approved in the plans.

Least Bell's Vireo. Least Bell's vireo have been documented approximately 100- 300 feet west of the CER bridge. Measures to minimize impacts to this species include:

- No construction will occur within the river corridor during the combined breeding seasons of the light-footed clapper rail and least Bell's vireo (February 15 – September 15);
- Noise from construction activities outside of the river corridor will not exceed 60dBA (1 hour) at the river corridor (or ambient, whichever is greater) during the combined breeding seasons of the light-footed clapper rail and least Bell's vireo If the noise limit is exceeded, the noise will be reduced by using temporary noise measures such as plywood barriers, equipment mufflers, or sound blankets;

HYDRAULIC IMPACTS DURING CONSTRUCTION

Rick Engineering Company has prepared a preliminary assessment of the hydraulic impacts of the proposed temporary construction options anticipated for the El Camino Real Bridge. This section is intended to summarize the temporary hydraulic conditions that should be considered for potential construction methods.

As described previously, the construction methods specific to the bridge include the use of a Berm and/or Trestle in order to provide the required construction access and platform for equipment during construction. These access areas are already considered within the project boundary and in addition to the structural considerations of constructing the bridge; biological resources and hydraulic conditions within the river corridor are being considered. Therefore, an approach reflecting each of these potential issues is needed. Hydraulic issues should include specific return frequency storm events, daily flows, and tidal flow (if applicable). At this time, tidal flows are not being considered since the approximate limit of tidal influence is considered to occur at the downstream edge of the bridge.

Construction Phase

In order to provide required access for construction equipment, the berm or trestle option will need to elevate the berm/trestle to an elevation that is above daily flows within the river, however, low enough that it limits potential increases in water surface elevations for larger storm The main channel of the river corridor contains events (i.e. - 100-year storm event). approximately the 10-year storm event; however, nearly the entire 100-year storm event is conveyed under the existing bridge along the main channel corridor. During previous site visits, daily flows have been observed to occur at in the lower foot of the channel (plus or minus). Therefore, an opening in the berm would be needed, either in the form of culverts or a low flow channel opening that is sized to convey these daily flows, plus up to a preferred storm event (i.e. 2-year storm event or 1-inch storm event, etc). It is important to note that providing an opening to convey the 10-year storm event would not be practical since the main channel capacity is already limited to the 10-year storm event. Given the biological resources which include the presence of clapper rail and other species, a natural low flow opening may be preferable to allow a wildlife corridor during construction. Based on input from the structural engineer, it sounds like a 30 to 40-foot span could be provided over such a low-flow opening, which may equate to approximately a 20-foot bottom width. If additional low-flow capacity is needed, culverts could also be added to extend through the berm.

For typical construction activities, equipment can be removed at the end of each work day outside the limits of the main channel. However, for the large platform and crane that will be needed, it is not practical to remove at the end of each work day; therefore, this would be removed only with a predicted chance of precipitation greater than a specified amount (i.e. -a 50% chance of precipitation for 0.5 inches of rain or greater). For example, if the low-flow system has capacity to convey anticipated runoff from a 1-inch storm event, then the equipment would be removed if there is a 50% chance of precipitation expected to exceed 0.5-inches (providing a factor of safety).

In summary, key hydraulic considerations include:

- Elevation of temporary berm or trestle
- Low-flow opening(s) sized for daily flows and up to a specific storm event (i.e. 1- inch storm or 2-year storm event)
- Minimize increase to water surface elevations for larger storm events (i.e. 10-year, 50-year, 100-year).
- Removal of equipment from the channel with the prediction of storm events larger than those capable of bypassing through the low flow opening(s), including a factor of safety.

Modeling and Analysis

Once a preferred approach is selected, modeling can be provided to assess required elevations for the berm/trestle, capacity of low-flow openings, impacts to water surface elevations, and storm events that can be passed through the temporary configuration within the bridge corridor.

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Appendix E

Letters of Comment on 2006 Draft EIR

El Camino Real Bridge – EIR Comment Letters

Native American Heritage Commission San Diego County Archaeological Society, Inc. R.B. General, LLC Barbara Salvini, City of San Diego County of San Diego Hecht, Solberg, Robinson, Goldberg, Bagley Dr. & Mrs. Hu California Coastal Commission Carl Schroeder State of California Wertz, McDade, Wallace, Moot, Brower San Pasqual Reservation City of Del Mar Carmel Valley Community Planning Board San Dieguito Planning Group Santa Fe Irrigation District San Diego Audubon Society Rancho Santa Fe Association Friends of San Dieguito River Valley Allen Matkins San Dieguito River Valley Regional Open Space Park US Fish & Wildlife and Cal Fish & Game State of California, State Clearinghouse and Planning Unit July 28, 2006 July 29, 2006 August 21, 2006 August 29, 2006 August 30, 2006 September 5, 2006 September 6, 2006 September 6, 2006 September 11, 2006 September 12, 2006 October 2, 2006 October 9, 2006 October 9, 2006 October 10, 2006 October 12, 2006 October 15, 2006 October 17, 2006 October 19, 2006 October 19, 2006 October 19, 2006 October 20, 2006 October 23, 2006 October 24, 2006

STATE OF CALIFORNIA

Amold Schwarzenegger, Governor

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 384 SACRAMENTO, CA 95914 (916) 653-4082 Fax (916) 657-5390 Web Site www.naho.ca.gov

July 28, 2006

Ms. Donna Clark

City of San Diego Development Services Department 1222 First Avenue, MS 501 San Diego, CA 92101

Re: <u>SCH#2006071104; CEQA Draft EIR; Development Permit</u>, <u>Widening El Camino Real and Replacing Bridge of</u> San Dieguito River crossed by Via De La Valle; North City future urbanization; San Diego County, California.

Dear Ms. Clark:

Thank you for the opportunity to comment on the above-referenced document. The California Environmental Quality Act (CEQA) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR per CEQA guidelines § 15064.5(b)(c). In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the area of project effect (APE), and if so, to mitigate that effect. To adequately assess the project-related impacts on historical resources, the Commission recommends the following action:

√ Contact the appropriate California Historic Resources Information Center (CHRIS). The record search will determine:

- If a part or the entire APE) has been previously surveyed for cultural resources.
- If any known cultural resources have already been recorded in or adjacent to the APE.
- If the probability is low, moderate, or high that cultural resources are located in the APE.
- If a survey is required to determine whether previously unrecorded cultural resources are present.

 $\sqrt{1}$ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.

- The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
- The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.

V Contact the Native American Heritage Commission (NAHC) for:

- * A Sacred Lands File (SLF) search of the project area and information on tribal contacts in the project vicinity who may have additional cultural resource information. Please provide this office with the following citation format to assist with the Sacred Lands File search request. <u>USGS 7.5-minute guadrangle citation</u> with name, township, range and section;
- The NAHC advises the use of Native American Monitors to ensure proper identification and care given cultural resources that may be discovered. The NAHC recommends that contact be made with Native American Contacts on the attached list to get their input on potential project impact, particularly the contacts of the on the list.

 $\sqrt{}$ Lack of surface evidence of archeological resources does not preclude their subsurface existence.

- Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5 (f).
 In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
- Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.

 $\sqrt{}$ Lead agencies should include provisions for discovery of Native American human remains or unmarked cemeteries in their mitigation plans.

* CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens.

 \checkmark Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the CEQA Guidelines mandate procedures to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cometery.

<u>V</u> Lead agencies should consider avoidance, as defined in § 15370 of the CEQA Guidelines, when significant cultural resources are discovered during the course of project planning.

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely Dave Singleter Program Analys

Cc: State Clearinghouse Attachment: List of Native American Contacts Barona Group of the Capitan Grande Rhonda Welch-Scalco, Chairperson 1095 Barona Road Diegueno , CA 92040 Lakeside sue@barona.org (619) 443-6612

Native American Contact San Diego County July 28, 2006 San Pasqual Band of Mission Indians Allen E. Lawson, Chairperson PO Box 365 Diegueno Valley Center .CA 92082

Kumeyaay Cultural Historic Committee

,CA 92001

(760) 749-3200

56 Viejas Grade Road

(760) 749-3876 Fax

Ron Christman

(619) 445-0385

Alpine

Santa Ysabel Band of Diegueno Indians Johnny Hernandez, Spokesman **PO Box 130** Diequeno Santa Ysabel ,CA 92070 brandietavior@yahoo. (760) 765-0845

(760) 765-0320 Fax

Los Covotes Band of Mission Indians Katherine Saubel, Spokesperson P.O. Box 189 Cahuilla Warner Springs , CA 92086

(760) 782-0711

(760) 782-2701 - FAX

Pala Band of Mission Indians Robert Smith, Chairperson PMB 50, 35008 Pala Temecula Road Pala ,CA 92059

(760) 742-3784

(760) 742-1411 Fax

Mesa Grande Band of Mission Indians Mark Romero, Chairperson P.O Box 270 Santa Ysabel CA 92070 mesagrandeband@m (760) 782-3818

Diegueno

Diegueno/

(760) 782-9092 Fax

Kumeyaay Cultural Heritage Preservation Paul Cuero 36190 Church Road, Suite 5 , CA 91906 Campo

Diegueno/

(619) 478-9046 (619) 478-9505 (619) 478-5818 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

Luiseno

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This list is only applicable for contacting local Native Americans with regard to cultural resources for the proposed SCH#1999071104; CEQA Draft EIR, Specific Plan for El Camino real Road/Bridge Widening Project; crosssed by San Dieguito. Road and Via De La Vi near Interstate 5; replace existing bridge over San Dieguito River; North City/County; San Diego County, California.

07/28/2006 13:12 FAX 916 657 5390	NAHC	2 004
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	Native American Contac San Diego County July 28, 2006	t
Kwaaymii Laguna Band of Mission India Carmen Lucas P.O. Box 775 Pine Valley , CA 91962 Die	ans Kumeyaay Cultura Steve Banegas, S 1095 Barona Road	
(619) 709-4207	(619) 443-6612	
· •	(619) 443-0681 FA	x
San Luis Rey Band of Mission Indians Russell Romo, Chairman 12064 Old Pomerado Road Poway , CA 92064 (858) 748-1586	P.O. Box 369	
Santa Ysabel Band of Diegueno Indians Devon Reed Lomayesva, Esq, Tribal At PO Box 130 Dieg Santa Ysabel , CA 92070 Dieg (760) 765-0845 (760) 765-0320 Fax	torney Carmen Mojado, C aueno 1889 Sunset Dr.	d of Mission Indians Co-Chair , CA 92081 ^{Luiseno}
(700) 705-0320 Fax		
Tala LA 97059	Seno Cupa Cultural Cen Shasta Gaughen, J 35008 Pala-Temecula Re Pala , cupa@palatribe.co (760) 742-1590	Assistant Director d.PMB Box 445 CA 92059 Luiseno

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,CA 92070

Native American Contact San Diego County July 28, 2006

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Diegueno/

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cjlinton73@aol.com

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To:

San Diego County Archaeological Society, Inc.

Environmental Review Committee

29 July 2006

Ms. Donna Clark Development Services Department City of San Diego 1222 First Avenue, Mail Station 501 San Diego, California 92101

Subject: Draft Environmental Impact Report El Camino Real Road/Bridge Widening Project Project No. 2982

Dear Ms. Clark:

I have reviewed the historical resources aspects of the subject DEIR on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the DEIR and it archaeological and historical properties assessment appendices, we agree with the impact analysis and mitigation measures as prescribed in the DEIR.

SDCAS appreciates being included in the City's environmental review process for this project.

Sincerely,

Japies W. Royle, Jr., Chairr Environmental Review Committee

cc: Tierra Environmental Services SDCAS President File

RB General, LLC

August 21, 2006

Donna Clark Environmental Planner, City of San Diego Development Services Center 1222 First Avenue, MS 501 San Diego, CA 92101

Roger Boesky Managing Member, Polo Plaza, LLC 810 Emerald Street San Diego, 92109

SUBJECT: EL CAMINO REAL ROAD/BRIDGE WIDENING PROJECT AFFECTING 3790 and 3702 Via de la Valle, Del Mar, CA 92014

To Whom It May Concern:

We are the owners of the shopping centers at 3790 Via de la Valle and 3702 Via de la Valle. Del mar, CA 92014. Either of the two proposed bridge widening projects will substantially change the traffic pattern for our buildings and it is imperative that the following issues are considered before construction, to ensure a safe and reasonable raffic pattern in the areas affected.

We have employed Jim Federhart, a licensed engineer specializing in traffic studies to assist us in the proposed projects set forth above. His findings are attached to this letter for your consideration. I have attached a map outlining the entrances to our property for your reference, as well as maps showing the four (4) U-Turns that we are requesting to be installed.

We ask that you consider these changes, not only for the safety of the public, but to recognize the rights of reasonable and convenient access that our tenants, guests and invitees have grown accustom to over the past 20 years.

<u>WESTERN ALIGNMENT</u> – Expanding the existing El Camino Real roadway The plan that we would prefer, is the one that will cause the least disruption to the existing traffic pattern. This plan involves keeping El Camino Real in its current location and widening the existing road and the existing bridge.

El Camino Real intersects at Via de la Valle directly in front of our 3702 Via de la Valle building. With the expansion of this traditional alignment, traffic heading north on El Camino Real would have a traffic signal allowing traffic to continue straight into our parking area. It would also allow for a signalized left turn into our parking area for traffic traveling east on Via de la Valle.

This alignment uses the existing El Camino Real roadway and seems the most logical for an expansion by utilizing existing casements and existing roadways.

Under both plans, there will be a raised median dividing the road along the frontage of our property. The raised medians will change the ease of ingress and egress into our

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810 Emerald, San Diego, CA 92109 Phone 858 272 1245 • Fax 858 272 1563

rbgener@aoi.com

property. To increase safety, and to not restrict access into the property, we are requesting signaled U-turns to be installed at each intersection affected by the road work and raised medians.

We request a signaled U-turn at the following intersections:

1. We request a signaled U-turn at Via del Canon/Via de la Valle for west bound traffic on Via de la Valle to return east.

2. We request a signaled U-turn at El Camino Real/Via de la Valle for east bound traffic on Via de la Valle to return west.

3. We request a signaled U-turn at El Camino Real/Via de la Valle for west bound traffic on Via de la Valle to return east.

4. We request a signaled U-turn at El Camino Real North/Via de la Valle for cast bound traffic on Via de la Valle to return west.

It is imperative that, if the raised median is installed as planned, that each of these intersections not only have a traffic signal, but that they each allow for a U-Turn for our guests and tenants to be able to safely and conveniently access our property.

EASTERN ALIGNMENT-Moving El Camino Real Roadway

The second proposal is moving El Camino Real, known as the "Eastern Alignment". In this proposed arrangement, we would still request four (4) signaled U-turns are made available to allow safe access to our property since the raised medians will not allow for a left turn into our property while heading east on Via de la Valle.

The signaled U-turns are also vital for those wishing to head east after leaving our property.

1. We request a signaled U-turn at Via del Canon/Via de la Valle for west bound traffic on Via de la Valle to return east.

2. We request a signaled U-turn at El Camino Real/De la Valle Place for east bound traffic on Via de la Valle to return west.

3. We request a signaled U-turn at El Camino Real/De la Valle Place for west bound traffic on Via de la Valle to return east.

4. We request a signaled U-turn at El Camino Real North/Via de la Valle for east bound traffic on Via de la Valle to return west.

Thank you in advance for considering the four (4) signaled U-turns and helping to ensure the safety of our clients and patrons during this time of growth and expansion.

Sincerely,

⁷Róger Boesky Polo Plaza, LLC RB General, LLC Managing Member

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810 Emerald, San Diego, CA 92109 Phone 958 272 1245 • Fax 858 272 1563

<u>.</u>

rbgener@aol.com

3790 Via de la Valle, Del Mar. CA 92014 Phone 858 792 6600 • Fax 858 792 6384



THE CITY OF SAN DIEGO

August 29, 2006

Ms. Donna Clark, Environmental Planner, City of San Diego Development Services Center 1222 First Avenue, MS 501 San Diego, CA 92101

Dear Ms. Clark:

Subject: Draft Environmental Impact Report for El Camino Real Road/ Bridge Widening Project

We have reviewed the subject report dated July 25, 2006 which was received by our offices July 25, 2006. Our comments as follows:

The Metropolitan Wastewater Department has existing facilities that would be affected by the subject project. All existing sewer facilities are described on pages 3.6-3 in the report.

The existing sewer facilities need to be evaluated for impact from the project. According to your report additional fill will be placed over the existing sewer alignment. Please provide loading calculations for the existing sewer main with the anticipated fill load.

If you choose the relocation alternative for the existing sewer mains within your project area, you must submit a sewer study, contents of which are outlined in the "2004 City of San Diego's Sewer Design Guide" and sewer relocation plans to MWWD/Development/Wastewater, Barbara Salvini., Senior Civil Engineer, 600 B St., Suite 2210, San Diego, CA 92101.

If you have any questions or require any additional information please call me at 619-533-5106 or Assistant Engineer Irina Itkin at 619 533-4248.

Sincerely,

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Burbaro Giro, Salu-

BARBARA A.B. SALVINI Senior Civil Engineer



Ms. Donna Clark August 29, 2006 Page 2

¢,

cc: Chris Toth, Deputy Director, Metropolitan Wastewater Department Ann Sasaki, Deputy Director, Metropolitan Wastewater Department Isam Hireish, Senior Civil Engineer, Metropolitan Wastewater Department Mehdi Rastakhiz, Associate Engineer-Civil, Metropolitan Wastewater Department Hushmand Yazdani, Associate Engineer-Civil, Metropolitan Wastewater Department Janet Buttmann, Assistant Engineer-Civil, Metropolitan Wastewater Department

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CITY OF SAN DIEGO M E M O R A N D U M

DATE:	September 21, 2006
TO:	Abi Palaseyed, Engineering and Capital Projects
FROM:	Donna Clark, Development Services
SUBJECT:	El Camino Real Road/Bridge Widening Project

Attached is a letter I received from the water and sewer reviewer in response to the draft EIR. We do not respond in the EIR to comment letters from City departments. Therefore, I am attaching a note to the letter when I forward it to Katherine telling her not to provide a response. However, I still need to respond to Barbara Salvini's letter.

Please review the letter and provide responses to her issues and send to me so that I may write a formal letter. You may want to discuss with Katherine whether the EIR needs any revision in regard to the issues raised in the letter.

If you have any questions, please let me know.

Thank you!



County of San Diego

DEPARTMENT OF PUBLIC WORKS

JOHN L. SNYDER DIRECTOR

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5555 OVERLAND AVE, SUITE 2188 SAN DIEGO, CALIFORNIA 92123-1295 (858) 694-2212 FAX: (858) 268-0461 Web Site: sdcdpw.org

August 30, 2006

Donna Clark Environmental Planner City of San Diego Development Services Center 1222 First Avenue, MS 501 San Diego, CA 92101

Dear Ms. Clark:

PROJECT NUMBER 2982; EL CAMINO REAL ROAD / BRIDGE WIDENING PROJECT

San Diego County Department of Public Works staff has reviewed the Transportation Analysis (TA) prepared by Urban Systems Associates, Inc dated May 9, 2006 regarding the City of San Diego's proposed El Camino Real road/bridge widening project. The project proposes to widen El Camino Real from two to four lanes between Via de la Valle and San Dieguito Road. The following are our comments:

- The TA should indicate if the proposed road/bridge widening is in conformance with the City's Circulation Element classification for El Camino Real.
- The TA should include a "with" and "without/no build" project analysis to determine what effect the proposed project would have on year 2030 traffic volumes for the segments of El Camino Real, San Dieguito Road, and Via de la Valle located within the County's jurisdiction. The TA should verify that the proposed project and the resulting redistribution of traffic for study area roads will not cause significant traffic impacts to County roadway facilities.
- The LOS tables in the TA should identify which roadway segments and intersections are located within the County's jurisdiction.
- The LOS assessment of roadway segments within the County's jurisdiction should be based on the County's Public Road Standard LOS Criteria.

Ms. Clark August 30, 2006 Page 2

- The TIA should identify if the eastern segments of Via de la Valle at the Via de la Valle/El Camino Real intersection is maintained by the City or the County.
- The TA should note that the County would require construction and encroachment permits for any work performed within the County's right-of-way.
- The TA only includes a year 2030 analysis. If the TA will function as a projectlevel/specific analysis instead of a program-level assessment, the TA should provide the following information:
 - An opening day (post-widening) analysis
 - Fully dimensioned conceptual striping and signing plans for all proposed road and intersection improvements.
 - Plans that show existing and future right-of-way along project roadway segments
 - City staff should coordinate with the DPW Traffic Section regarding proposed improvements affecting County roads. All proposed traffic control mitigation measures should be coordinated with the County's DPW Traffic Section.

If you have any questions or need additional information, please contact Lee Shick, DPW Project Manager, at (858) 694-3235.

Sincerely,

RILE. Cpto

RICHARD E. CROMPTON, Assistant Director Department of Public Works

cc: Darren Gretler (O336); Bob Goralka (O334); Nick Ortiz (O334), Mike Robinson (O334); Eric Swanson (O334); Tom Harrington (O200); Lee Shick (O336); Greg Carlton (O336)

 HECHT
SOLBERG
ROBINSON
GOLDBERG
BAGLEY
 LLP

PAUL E. ROBINSON E-Mail:probinson@hsrgb.com

September 5, 2006

Via E-mail and U.S. Mail

Donna Clark, Environmental Planner City of San Diego Development Services Center 1222 First Avenue, MS 501 San Diego, California 92101

El Camino Real Road, Bridge Widening Project Ret Project No. 2982, SCH No. 1999071104

Dear Ms. Clark:

On behalf of our client, the San Diego Polo Club ("Polo Club"), we are submitting comments on the Draft Environmental Impact Report ("DEIR") for the above-referenced matter ("Project"). The DEIR's preferred eastern alignment would significantly impact the Polo Club's property and its operations. The eastern alignment would encroach into an existing polo field resulting in a loss of the entire polo field and thereby reducing the number of polo fields from five to four. The loss of the polo field could bring about the cancellation of soccer practices and the bi-annual Surf Cup. In addition, the Polo Club would have to buy back or reduce the number of Polo Club memberships offered. Any reduction in membership or activities at the Polo Club results in an enormous financial impact to the Polo Club.

In addition, any closure of the El Camino Real entrance to the Polo Club's property, although temporary, would create a significant safety hazard by forcing Polo Club patrons to use other entrances to and parking areas of the Polo Club that were not designed for high volume use. This closure would cause motor vehicles to closely mix with the numerous horses housed at the Polo Club. This safety concern could result in the cancellation of the Sunday polo matches, costing the Polo Club approximately \$200,000 per year in lost revenues, and cancellation of soccer practices for the Surf Cup.

In light of the foregoing, the Polo Club supports the DEIR's central or western alignment alternatives. Should you have any questions concerning our client's comments, please do not hesitate to contact me.

Sincerely.

Paul E. Robinson HECHT SOLBERG ROBINSON GOLDBERG & BAGLEY LLP

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Council President Scott Peters CC: Jim Waring, Chief Operating Officer, Land Use and Economic Development Mr. Chris Maloney, San Diego Polo Club Mr. Chris Collins, San Diego Polo Club

ATTORNEYS AT LAW 600 WEST BROADWAY, EKSHTH FLOOR SAN DIEGO, CALIFORNIA 92101 TELEPHONE 619,239,3444 FACSIMLE 619,232,6828

Dr. and Mrs. T. C. Hu 8775 Costa Verde Boulevard, No. 604 San Diego, CA 92122

September 6, 2006

Ms. Donna Clark Environmental Planner City of San Diego Development Services Center 1222 First Avenue, MS 501 San Diego, CA 92101

Re: Draft Environmental Impact Report JO 119733; Project No. 2982; SCH No. 1999071104 El Camino Real Road/Bridge Widening Project

Dear Ms. Clark:

My family represents one of the few private property owners directly affected by the subject project. We own approximately 24 acres located on the south side of Via de la Valle, just east of El Camino Real. Our property consists of three legal parcels (APN # 302-090-29-00, 302-090-31-00, and 302-090-32-00). We want to thank you for the opportunity to submit our comments in response to the above referenced environmental impact report. It is obvious that a Herculean effort has been undertaken to create the most comprehensive document possible. This effort is most appreciated. We are generally in support of the project and hope that the Decision Maker selects the best alternative that fulfills the needs of the City, the Community and those impacted by the project.

While it may be appropriate to suggest a number of minor corrections or clarifications to the Report, most of these adjustments would not result in any revision to the conclusions made by this Report. Consequently, we would rather focus on a few major issues that materially impact both the Project and our property. These issues will be discussed below:

Land Use: In Section 3.1.2.1 and in Table 3.1-1, the Report characterizes our property as simply being "vacant". Overall, the Report gives the impression that, without a phase shift, the highest and best use of the property is nothing more than open space. This characterization draws the reader to the conclusion that our property could easily provide the right-of-way necessary for this Project with little or no consequence to the utilization of the balance of our property.

This characterization is both inaccurate and unreasonable. Over the 27 years of our ownership alone, the property has been used agriculturally to grow and sell crops. It was used for over ten years by the North County Riding School (horses). The City even

Letter to Ms. Donna Clark El Camino Real Road/Bridge Widening Project Draft Environmental Impact Report JO 119733; Project No. 2982; SCH No. 1999071104 September 6, 2006 Page 2

presented us with a citation for making the property available to the Olympics when the equestrian events were here back in 1984. Those familiar with the area also know that our property is used regularly for parking for the Surf Cup soccer tournaments and the San Diego County Fair.

Even though the Report cites the North City Future Urbanizing Area Framework Plan as the current planning document (Section 3.1), the identified use of our property is not open space but rather Estate Residential and Commercial Recreation. While it may be common knowledge that the existing A-1 zoning was applied simply as a "holding zone", even without a zone change, the A-1 zone would also permit residential development, churches, schools, senior housing and other institutional uses on our property. Consequently, it is respectfully requested that the Report be revised to reflect the proposed land uses for our property consistent with the adopted Framework Plan.

Wetlands: With each of the evaluated alternatives, the Project proposes to construct a drainage channel approximately 60 feet wide along the southerly side of the proposed Via de la Valle right-of-way to accommodate approximately 616 cfs of runoff originating on the north side of Via de la Valle. As clearly documented in Appendix "A" of the Report, the installation of the existing drainage facilities underneath Via de la Valle in 1986-87, discharging onto our property, was done so illegally and without our permission. This illegal installation resulted in the creation of wetlands vegetation in the existing drainage swale that presently runs westerly along the southerly side of Via de la Valle. This is in spite of the fact that in the Abstract of Judgment regarding a Superior Court decision, which was made in 1996, stated that our property "... is not wetland or environmentally sensitive." To perpetuate this illegal activity with the construction of an even larger drainage facility and then revegetate it with wetland species is seemingly inappropriate. In Section 3.7, the Report clarifies that this drainage channel was selected in order to evaluate the most significant impact possible. However, the scope of the project should be revised to eliminate a component that, through its genesis, was created illegally. We respectfully request that the scope of the project be revised to eliminate the drainage channel and to replace it with a storm drain conduit that can be situated within the proposed Via de la Valle right-of-way.

<u>Hydraulics</u>: Hydraulically, the drainage channel proposed for the southerly side of Via de la Valle won't work as currently plotted. The plans call for approximately 600 cfs to be transported underneath Via de la Valle within a newly constructed box culvert and discharged into the drainage channel where the flow is expected to make an immediate 90° turn to the west within a 60' wide earth-lined channel. Flow of this magnitude cannot make this turn in this small of an area, particularly within an earth-lined channel. Consequently, the size of the drainage channel, specifically at the point of this change in

Letter to Ms. Donna Clark El Camino Real Road/Bridge Widening Project Draft Environmental Impact Report JO 119733; Project No. 2982; SCH No. 1999071104 September 6, 2006 Page 3

flow direction, is understated. This design detail deficiency only reinforces the conclusion that the 100 year storm flow originating northerly of Via de la Valle should be contained in a box culvert at this location as the flow can not be expected to be contained in an open channel as currently depicted.

<u>Access</u>: Although our property currently does not take physical access off of Via de la Valle between the intersections of El Camino Real South and El Camino Real North, we are not precluded from doing so. That not withstanding, we have never been asked to relinquish our access rights to Via de la Valle between these two intersections. Following the road widening improvements on Via de la Valle, our property will still have approximately 900 lineal feet of frontage to Via de la Valle where access could be taken. However, the proposed construction of a 60-foot wide open drainage channel along the southerly side of Via de la Valle. This denial of physical access should be addressed in Section 3.2.3.2 Issue 1b (page 3.2-9) as a Long-term Impact. As discussed in the paragraphs above, this long-term impact could be easily mitigated by the substitution of a box culvert for the open channel.

Ultimate Improvement of Via de la Valle: The Framework Plan classifies Via de la Valle between El Camino Real South and El Camino Real North as a four-lane major roadway. However, the project proposed to transition from four lanes at El Camino Real South to two lanes before traffic reaches the intersection of El Camino Real North. The proposed Year 2030 volumes of traffic eastbound on Via de la Valle, e.g. 23,500 ADT (Table 3.2-5), can not be accommodated at an acceptable level of service, e.g. LOS C, with only two travel lanes. It only makes sense to fully improve Via de la Valle as a four-lane roadway between the two El Camino Real intersections and thus achieve a true Level of Service C and then taper back to two lanes easterly of the intersection of El Camino Real North where it is anticipated that Via de la Valle will never be widened to four-lanes. At this point, however, the Report does not address this requirement and its associated impacts.

<u>Impacts of Bridge Construction on Private Development</u>: In the "Hydraulics Section" of Section 3.7.3.1 Issue 1a: Impacts on Hydrology and Hydraulics of the San Dieguito River (page 3.7-19), it states the following:

"Regardless, the proposed steepening of the abutments under the bridge from 2:1 to 1.5:1 would provide the additional capacity needed to offset the potential increase in water surface elevation upstream. The existing condition 100-year water surface elevations estimated with year 2004 topography would be maintained or lowered (as shown in the previous table, Table 3.7-2).

Letter to Ms. Donna Clark El Camino Real Road/Bridge Widening Project Draft Environmental Impact Report JO 119733; Project No. 2982; SCH No. 1999071104 September 6, 2006 Page 4

Table 3.7-2 goes on further to demonstrate that, with the design features for the El Camino Real bridge, the proposed water surface elevation for the 100-year flood easterly of the bridge will be less than that under existing conditions. It is not clear, however, if the analysis performed by Rick Engineering Company – April 2006 anticipated any development of our property. Any future fill on our property to elevate site improvements to above the 100-year flood levels could impact flood flows at or upstream of the bridge.

Normally, grading upstream would be an individual private development concern. However, since the bridge construction will go first, its design will dictate what can or cannot ultimately be accomplished upstream of the bridge. If the bridge construction limits our ability to fill portions of our property, e.g. it becomes economically infeasible to improve our property once the bridge construction has been completed, then the construction of the bridge has created a long term – permanent impact to our property. This impact should be analyzed and then discussed in Section 3.7.3.1. Failure to incorporate this matter into the design of the bridge would be tantamount to condemnation of our property. Hopefully, that will not be the case. However, such documentation needs to be incorporated into this Report.

Thank you again for the opportunity to comment on this Report. I would be more than happy to meet with you to discuss the above and any other issues related to this project.

Sincerely yours,

cc.

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Dr. T.C. Hu, PhD. Property Owner, PIF #2

Mr. John D. Leppert, Leppert Engineering Corporation

STATE OF CALLFORNIA - THE RESOURCES AGENCY

CALIFORNIA COASTAL COMMISSION SAN DIEGO AREA 7575 METROPOLITAN DRIVE, SUITE 103 SAN DIEGO, CA 92108-4421 (619) 767-2370



September 6, 2006

City of San Diego Development Services Center Attn: Donna Clark, Environmental Planner 1222 First Avenue, MS 501 San Diego, CA 92101

Re: Project No. 2981, SCH No. 1999071104 (El Camino Real Bridge EIR)

Dear Ms. Clark:

Thank you for providing the opportunity to review the draft Environmental Impact Report (EIR) for the El Camino Real Road/Bridge Widening project. Unfortunately, workload constraints do not permit a thorough review of this document at this time. The following comments are those that were immediately apparent in a brief overview of the document. The draft EIR raises a number of issues, particularly with respect to coastal development permit jurisdiction. As explained below, the Coastal Commission has coastal development permit jurisdiction for this project.

In the draft EIR, Coastal Development Permit jurisdiction has been determined through use of the City of San Diego's C-730 map series. However, for purposes of depicting coastal development permit jurisdiction, these maps are in draft form and contain many errors. The project site is in an area of deferred certification, which means coastal development permit jurisdiction rests solely with the California Coastal Commission, not with the City of San Diego. The Commission's partial approval of the North City Future Urbanizing Area (NCFUA) Framework Plan in 1993 specifically identified that coastal development permit authority would only transfer to the City of San Diego upon certification of subarea plans. When the Commission certified Subarea III (Pacific Highlands Ranch) and Subarea V (Del Mar Mesa), the City requested coastal development permit authority for those specific subareas, and the Commission formally transferred said authority to the City at the time the plans were effectively certified.

The project site is located in Subarea II of the NCFUA. No subarea plan has ever been certified for Subarea II (as noted on Page 3.1-2 of the draft EIR), such that the entire subarea in the coastal zone remains in the Coastal Commission's coastal development permit jurisdiction. As such, the legal standard of review for the coastal development permit is Chapter 3 of the Coastal Act, although the cited planning documents will be considered as guidance. The incorrect coastal development permit jurisdiction is cited on Pages 1-5, 1-9, 1-11, 1-16, 2-20, not cited at all on Table 2-2 on Page 2-21, and again cited incorrectly on Page 3.1-2 of the Draft EIR. Figure 3.1-3 is also incorrect. In addition, Section 3.12.1.2 fails to identify the Coastal Commission within the Regulatory Setting as regulating biological resources pursuant to Coastal Act policies.

City of San Diego/Clark August 31, 2006 Page 2

Also on Page 1-10 or 1-11, and in Table 2-2 on Page 2-21, it should be noted that a Federal Consistency Certification from the California Coastal Commission may be required because of the need for federal permits and use of federal monies for the proposed development. Ultimately, the Consistency Certification process may be waived since the Commission will also be issuing the Coastal Development Permit; however, at this time, it should be identified as a required discretionary approval.

The draft EIR identifies that the San Dieguito River Park Joint Powers Authority (JPA) property west of El Camino Real and south of the San Dieguito River (formerly Boudreau property) will be used as the project's mitigation site. This property is also identified as the site of mitigation for the JPA trails portion of the San Dieguito Wetlands Restoration Plan. The draft indicates that the project applicant and JPA are coordinating on use of this site. As such, we are making an assumption that the site is large enough to accommodate both mitigation proposals.

The Coastal Commission will be reviewing the application for the coastal development permit for this project. The main issues the Commission is likely to focus on are biological resources, hydrology, visual amenities and public access. These issues will be addressed in the context of Chapter 3 policies of the Coastal Act of 1976. In addition, the Commission is researching how the proposed development will affect the location of the coastal zone boundary, especially if the eastern alignment is chosen for the proposed project.

Again, thank you for the opportunity to review the draft EIR for the El Camino Real Road/Bridge project. Although it will not be possible to prepare additional comments within the allotted review period, the final document will be consulted as part of the coastal development permit process. Please call me if you have any questions.

Sincerely,

len Toiley

Ellen Lirley Coastal Planner

cc: Sherilyn Sarb, Coastal Commission Larry Simon, Coastal Commission

(G:\San Diego\ELLEN\EIR Comments\El Camino Real Bridge EIR Comment Letter.doc)

SEP 17 MB To: Donna Clark Fron : Casl Schroeder Re : Project No. 2982 (ElCanino Real + Via de la Valle) Thank you for giving my father the information on the referenced project. Whave reviewed all the information and an attaching my response as af affected business owner D work beven dans all week from 10Am to 11 or 12 P.M. Therefore dive deked my dad to help me with this important issue. You may contact me directly Jusing my cell phone 85/8-259-7603 or it may be gainen to dontact my father at 858-459-1611. Please send all notices of hearings are other information. to me at CARLON. SCHROEDER % R.A. SCHROEDER 7733 WHITEFIELD PL. LA JOLLA, CA 92037

September 11, 2006

Donna Clark, Environmental Planner City of San Diego Development Services Center 1222 First Avenue MS 501 San Diego, CA 92101

Re: Project No. 2982, SCH No. 1999071104 El Camino Real Road/Bridge Widening Project

Dear Ms. Clark:

I am the managing owner and chef of Blackhorse Grille, a popular restaurant, located on the ground floor of a two story building at 3702 Via de la Valle (where El Camino Real terminates at Via de la Valle). This property may be seriously impacted by the above referenced project. My restaurant serves over 150 patrons for dinner 7 days a week and employs over 30 staff members.

The only parking lot exclusively allocated for parking by our customers and unloading by delivery trucks servicing my restaurant is located along Via de la Valle, adjacent to the west of my restaurant. For both adequate traffic flow and health/safety reasons, the parking area has two entrances/exits on Via de la Valle (referred to as the west entrance/exit and the east entrance/exit).

The west entrance/exit allows traffic coming from the east and south to enter the restaurant lot. When exiting from the west entrance/exit cars and trucks are restricted to a right turn (west only). Therefore, the west exit is used only by traffic whose destination is west from the restaurant.

The east entrance/exit is tied into the current fully signalized intersection of Via de la Valle and El Camino Real. The traffic control lights at the intersection allow the restaurant customers and service vehicles to enter the lot from the south, east, and west. The traffic control lights also allow the cars and trucks to exit the lot and turn east or west on Via de la Valle or continue south through the traffic signal on El Camino Real. The majority of my restaurant's customers come from the east and south. Therefore, the current alignment allows them to exit from the parking lot in a way that takes them back to their homes and businesses in a very direct path.

The Central Alignment Plan being considered within the above referenced proposal maintains the current traffic linkage that continues this efficient and safe flow of traffic.

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Therefore, on behalf of myself, the restaurant's investors, employees and customers, I urge its adoption.

If the Eastern Alignment Plan is selected, a raised median would be built along the entire frontage of the restaurant and parking lot, forcing <u>all</u> of the customers and vendors exiting the lot to travel <u>only</u> in a westerly direction. This forced exit pattern would take <u>all east and south</u> destination automobiles and vendor trucks all the way west to the Flower Hill Mall near Highway 5 before they could make a U-Turn to start a return to their homes or business stops to the east or south of the restaurant. This Eastern Alignment Plan, thus, at best, places more traffic on Via de la Valle, creating traffic, environmental, and business problems.

If adopted, the Eastern Alignment Plan would probably destroy my restaurant business and also would make the space we lease near by unleasable to others. I hope the referenced environmental report will consider the people who will be affected by each solution proposed within the referenced project report. In my case, the people affected by your decision are the ownership, the employees, the vendors and most of the restaurant's customers.

I respectfully request you adopt the Central Alignment Plan to avert the adverse environmental and human effects outlined in this letter.

Very truly yours,

hul Carl N. Schroeder

Chef/Managing Owner Blackhorse Grille



Arnold Schwarzenegger Governor

STATE OF CALIFORNIA Governor's Office of Planning and Research State Clearinghouse and Planning Unit



Sean Walsh Director

Memorandum

Date:September 12, 2006To:All Reviewing AgenciesFrom:Scott Morgan, Senior PlannerRe:SCH # 1999071104El Camino Real Road/Bridge Widening

Pursuant to the attached letter, the Lead Agency has extended the review period for the above referenced project to October 21, 2006 to accommodate the review process. All other project information remains the same.

cc:

Donna Clark City of San Diego 1222 First Avenue, MS 501 San Diego, CA 92101

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044

Notic	See NOTE below							
	SCH # 1999071104							
Mail to: State Clearingh	ouse, 1400 Tenth Stre	et, S	Sacramento, CA 95814 916/44	\$5-0613	SCH # 1999071104			
1. Project Title: El Camino Rea	I Road/Bridge Widenin	a Pro	ject					
2. Lead Agency: City of San Die	GO	3.	Contact Person: Donna Clark					
3a. Street Address: 1222 First A			City: San Diego					
3c. County: San Diego		3d.	Zip: <u>92101</u> 3e. Pl	hone: (619)	446-5387			
Project Location El Camino Real b	etween San Dieguito	Road	and Via de la Valle.					
4. County: San Diego		4a.	City/Community: <u>San Diego</u>					
4b. Assessor's Parcel No		4c.	Section:	Township:	Range;			
5. Cross Streets: San Dieguito	Road and Via de la Va	lle	5a. For Rural, Nearest Commun	nity:				
6. Within 2 Miles: a. State Hu	6. Within 2 Miles: a. State Hwy #: 1-5 6							
6b. Raiiways:		6c.	Waterways: <u>San Dieguito Rive</u>	я.				
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8. Local Action Type 01.	05. 🗇 Annexation		09. 🗆 Rezone		12, 🛛 Waste Mgmt Plan			
02. I New Element	06. D Specific Pla				13. Cancel Ag Preserve			
03. General Plan Amendment	07. Community			ap, etc.)	14. Ø Other			
04. 🛛 Master Plan	08. 🛛 Redevelop	nent	11. 🖸 Use Permit		Development Permit			
9. Development Type 06. S Transportation: Ty	pe Road widening and	bride	re replacement					
					CEIVED			
10. Total Acres			11. Total Jobs Created	1				
				I N	IL 2 6 2006			
12. Project Issues Discussed in D				· ·				
					CLEARING HOUSE			
01. X Aesthetic/Visual	09. X Geologic/Seisn		17. D Social		etland/Binarian			
02. X Agricultural Land	10. D Jobs/Housing		nce 18. X Soil Erosion 19. D Solid Waste	26. X W				
03. X Air Quality 04. X Archaeological/Historical	11. I Minerals		20. Toxic/Hazardous		rowth inducing compatible Land Use			
04. X Archaeological/Historical 05. X Coastal Zone	12. X Noise 13. D Public Service	-	20. D Toxic/Hazardous 21. X Traffic/Circulation		compatible Land Use			
06. D Economic	14. D Schools	0	22. X Vegetation		leontological Resources			
07. D Fire Hazard	15. C Septic System	s	23. X Water Quality	31.00				
08. XI Flooding/Drainage	16. I Sewer Capacit		24. Water Supply	J	···•·			
13. Funding (approx.) Federal \$	15-19 MILLION		State \$	Total \$				
14. Present Lend Use and Zoning:								

2 ¹ 17

15. Project Description Widen El Camino Real between San Dieguito Road and Via de la Vaile, replace the existing bridge over San Dieguito River, and widen Via de la Valle between El Camino Real and El Camino Real North.

State Clearinghouse Contact 4* (916) 445-0613

State	Review	Began:	

10-21 \overline{E} SCH COMPLIANCE

Exte vian l

Please note State Clearinghouse Number (SCH#) on all Comments

7 - 26 - 2006

2006

SCH#: 1999071104 Please forward late comments directly to the Lead Agency

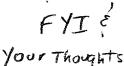
AQMD/APCD_27

(Resources: 7/29)

Project Sent to the following State Agencies

Resources Х Boating & Waterways 🖉 Coastal Comm Colorado Rvr Bd Conservation Conservation X Fish & Game # 5 Delta Protection Comm Forestry & Fire Prot Historic Preservation X Parks & Rec Reclamation Board Bay Cons & Dev Comm OES (Emergency Svcs) Bus Transp Hous Aeronautics <u>Σ</u> CHP X Caltrans # 11 Trans Planning Housing & Com Dev Food & Agriculture Health Services

State/Consumer Svcs General Services Cal EPA ARB - Airport Projects ARB - Transportation Projects ARB - Major Industrial Projects Integrated Waste Mgmt Bd SWRCB: Clean Wir Prog SWRCB: Wir Quality SWRCB: Wir Rights X Reg. WQCB #____ Toxic Sub Ctrl-CTC Yth/Adlt Corrections Corrections Independent Comm Energy Commission
X NAHC
Public Utilities Comm State Lands Comm Tahoe Rgi Plan Agency Ð AN



WERTZ MCDADE WALLACE MOOT BROWER

LAWYERS A

A PROFESSIONAL CORPORATION Lynn M. Beekman J. Michael McDade Sandra I. Brower Kathleen J. McKee Iulie A. Delahunt John S. Moot Richard T. Forsyth Elaine A. Rogers Jenny K. Goodman John H. Stephens Bonny Hsu Robert A. Vacchi Sarah H. Lapham Bruce R. Wallace Joseph C. Lavelle John Ross Wertz Larry L. Marshall Pamela Lawton Wilson

Rebecca Michael Evan S. Ravich

Of Counsel

Administrator Fred Mahady, Jr.

October 2, 2006

Richard Leja, Sr. Civil Engineer City of San Diego Engineering and Capital Projects 1010 Second Avenue, Suite 1200 San Diego, CA 92101

Re: <u>El Camino Real Bridge/Road Project</u>

Dear Mr. Leja :

We represent Mr. Michael Mosley, owner of Mary's Tack and Feed on Via de la Valle in San Diego. We are writing in response to Mr. Marsden's email of June 19, 2006 requesting a letter supporting or opposing the various design choices for the realignment of El Camino Real. At this point, Mr. Mosley remains in favor of the eastern alignment, and opposes the western or central alignments for the street.

It is our understanding that the western and central alignments will require additional dedication and/or improvement of land adjacent to Mary's Tack and Feed. Such alignment and improvements are detrimental to Mr. Mosley's continued use of the property and his long range plans for development. The existing topography and development on the site, as well as the shared access driveway, dictate that any expansion or remodel of the existing use must take place in the same area proposed for street dedication and/or improvement. In addition, any reduction in size of the current site will negatively impact customer parking and access for the delivery of goods for sale.

Mr. Mosley needs all of the existing site to maintain and grow the existing successful business. Every week, 4 to 6 large trucks deliver merchandise to the site. If the western or central alignment is chosen, these trucks will have no place to stop and unload without impacting the existing parking area and access to the property next door. The existing truck turnaround will also be effectively destroyed. Encroachment into the existing parking area will also have a detrimental impact on business. Many of Mr. Mosley's customers drive onto the site in trucks, often towing horse trailers. Past experience with construction has shown that customers will not go out of their way to find off-site parking and will patronize other stores if convenient parking is unavailable, or if access to the site is hindered by construction materials. This problem is made

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Richard Leja, Sr. Civil Engineer October 2, 2006 Page 2

even more serious due to the impending widening of Via de la Valle. A two to three year project immediately adjacent to the store will very likely force Mr. Mosley to close his business and lay off 50 employees.

The western and central alignments also present problems with access and traffic on both El Camino Real and Via de la Valle. These alignments require the placement of a median along the existing portion of El Camino Real which will require all users of the shared driveway to exit the site to the south. We believe that this median will create a traffic safety hazard by forcing any driver wishing to exit north, east, or west to perform an illegal u-turn to gain access to Via de la Valle. The eastern alignment creates a frontage road access for Mary's Tack and Feed with a required southeasterly exit from the property to the El Camino Real and Via de la Valle intersection. The eastern alternative's service road approach eliminates the opportunity for a u-turns across traffic, and the new alignment with Via de la Valle Place improves traffic flow along Via de la Valle through a single signalized intersection.

Given the conditions described above, Mr. Mosley remains in favor of the eastern alignment and opposed to the western and central alignments. Please call me if you have any additional questions.

Very truly yours,

Robert A. Vacchi

K.

LAWYERS



IPAI

San Pasqual Band of Diegueño Mission Indians of California

SAN PASQUAL RESERVATION

TRIBAL COUNCIL

Allen E. Lawson Chairman

Rudy Contreras Vice-Chairman

Angela Martinez-McNeal Secretary-Treasurer

Re: Project No. 2982, North City Future Urbanizing Area

The City of San Diego Development Services Center

Dear Ms. Clark:

October 9, 2006

1222 First Avenue, MS 501 San Diego, CA 92101

Donna Clark

Jerald Cope Delegate

David Toler Delegate In regards to your letter dated September 7, 2006, please be advised that the San Pasqual Band of Mission Indians considers this area as Kumeyaay ancestral territory. As always we are concerned with the disturbance of remaining cultural properties.

As this time we do not know of any sacred or sensitive sites at the proposed project site. Should you discover any funerary items or cultural remains please inform our offices, as they may include our ancestors.

Sincerely,

Rual h Jol

David L. Toler Councilman

P.O. Box 365 • 27458 N. LAKE WOHLFORD RD., VALLEY CENTER, CA 92082 PHONE 760-749-3200 • FAX 760-749-3876 • WWW.SANPASQUALINDIANS.ORG

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City of Del Mar

1050 Camino Del Mar • Del Mar, California 92014-2698

October 9, 2006

Donna Clark, Environmental Planner City of San Diego Development Services Center 1222 First Avenue, MS 501 San Diego, CA 92101

Re: Draft Environmental Impact Report (DEIR) for JO: 119733 El Camino Real Road/Bridge Widening Project

Dear Ms. Clark;

On behalf of the Del Mar City Council, I am forwarding the City's comments regarding the DEIR for the El Camino Real Road/Bridge Widening Project. As you are aware, the City of Del Mar has been a partner in the efforts to restore the San Dieguito Lagoon for more than two decades. Many years of environmental, hydrological, grading and design work have gone into that project to make sure that it adequately restores the lagoon habitat. The Restoration Project has been worked on and reviewed by numerous jurisdictions, as well as the resource agencies, the San Dieguito River Valley JPA and Southern California Edison to ensure that the project design and hydrology work correctly to accomplish the goal of restoration of the San Dieguito Lagoon.

We understand that the El Camino Real Road/Bridge Widening project is necessary to accommodate the current and future traffic needs in the area, however, we are very concerned that the City of San Diego include the appropriate mitigation measures in the project design to ensure the following: 1) that there be no significant impacts to the habitat in the San Dieguito River Valley, 2) that the project grading and design hydrology not negatively impact the upcoming Lagoon Enhancement project, and 3) that the visual quality of the views of the Lagoon and River Valley will not be significantly compromised.

To that end, Del Mar submits the following comments on the DEIR for the El Camino Real Road/Bridge widening project:

3.1 Land Use

3.1.1.1 Planned Land Uses Per Planning Documents.

The matrix identifies key goals and guidelines from each of the existing Land Use (LU) documents that govern the area. In response to all LU documents the matrix glosses over the goals for retaining the visual quality and natural scenic character of the area by proposing small fixes such as additional landscape or selections for treatments on the bridge rails. The impact to visual/aesthetics being proposed in the preferred Eastern Alignment Alternative would be significant in that this alternative proposes to build a new bridge east of the existing bridge and leave the current bridge in place. The reason being given for leaving the current bridge is

Donna Clark, Environmental Planner City of San Diego DEIR El Camino Real Road/Bridge Widening Page 2 of 5

> so it can be used for pedestrian, equestrians and bicycles. If the preferred alternative goes forward, alternative designs for accomplishing these trails should be explored rather than having two bridges at this location over the river. The current bridge should be removed and the habitat restored.

<u>3.2 Traffic</u>

The City of Del Mar has concerns for any alternative that would decrease the overflow parking currently being used at Horsepark by the Fairgrounds during the Fair and Race seasons. We feel that the removal of 70 spaces at Horsepark will be a significant impact to the City of Del Mar and the surrounding areas during the Fair and Race seasons, and alternative overflow parking should be identified and required.

How is "substantial reduction" defined in regard to the reduction of parking spaces? For the Western Alignment Alternative, an estimated 70 parking spaces, or 17% of the existing parking spaces, would be eliminated at Horsepark.

Although the parking spaces at Horsepark are not striped for parking, nevertheless, this is being used as parking for Horsepark and more importantly to the City of Del Mar, for overflow parking for the Del Mar Fairgrounds. Eliminating these 70 parking spaces (out of the 420 existing spaces) for the Western Alignment Alternative would not prevent the countless number of visitors who attend events at Horsepark and the Del Mar Fairgrounds from coming. Events at the Del Mar Fairgrounds directly impact traffic conditions for the City of Del Mar and surrounding areas. Eliminating 70 spaces without plans to provide alternative parking off-site would only worsen traffic conditions in the area.

3.3 Visual/Aesthetics

As noted in Section 3.1 above, the City of Del Mar is not only concerned about the visual impacts of the preferred Eastern Alignment alternative due to the fact that a new bridge is proposed and the current bridge is proposed to be retained, but that most of the alternatives propose bridge widths that exceed the widths necessary to provide adequate traffic lanes to reduce the LOS to a level below significance. It appears that there are other alternative designs that would accomplish the goal of improving the LOS while providing less visual impact to the San Dieguito River Valley. Some of those additional alternatives are being identified by the San Dieguito River Valley JPA in their comment letter which is supported by the City of Del Mar. Donna Clark, Environmental Planner City of San Diego DEIR El Camino Real Road/Bridge Widening Page 3 of 5

Additionally, view blockage as a result of the proposed bridge railings and the chain link fencing from the River Valley is significant and alternative designs need to be explored.

3.4 Historical

There is a concern that a historic expedition trail may be located in the project construction footprint. Section 3.4.3.2 on page 3.4-4 does not address the significance of the dirt road along the edge of the proposed triangular staging area (according to Figure 3.1-1 the dirt road appears to be within the right-of-way for El Camino Real and connects to Old ECR). This road may be a remnant of Portola's 1769 expedition but the EIR does not address this specifically. The concern is that this section may be the only remaining piece of this historic event and still retains some integrity. This information should be investigated and mitigation identified in the EIR if this is in fact correct.

3.7 Hydrology/Water Quality

San Dieguito Lagoon Enhancement Project

As noted in our letter, the City of Del Mar has been a partner in the efforts to restore the San Dieguito Lagoon for more than two decades. Many years of environmental, hydrological, grading and design work have gone into that project to make sure that it adequately restores the lagoon habitat. The Restoration Project has been worked on and reviewed by numerous jurisdictions, as well as the resource agencies, the San Dieguito River Valley JPA and Southern California Edison to ensure that the project design and hydrology work correctly to accomplish the goal of restoration of the San Dieguito Lagoon.

Appropriate mitigation measures must be included in the project design to ensure that there will be no significant impacts to the habitat in the San Dieguito River Valley and that the project grading and design hydrology will not impact the upcoming Lagoon Enhancement project.

Retaining the Existing Bridge

As noted above in Sections 3.1 and 3.3 the City of Del Mar has concerns that the preferred Eastern Alignment alternative proposes to leave the existing bridge in place and build a new bridge to the east of it. The EIR does not address the issue of floodwater trapping debris against the old bridge. The EIR actually states on Page 1 that there is not adequate room to pass debris under the existing bridge during flooding conditions. This needs to be addressed and mitigation proposed in the EIR.

Donna Clark, Environmental Planner City of San Diego DEIR El Camino Real Road/Bridge Widening Page 4 of 5

Increased velocities

Due to the age of the existing bridge, the increased velocity that will occur as a result of this project has the potential for causing damage to the existing bridge and needs to be addressed in the EIR and mitigation should be proposed.

The EIR does not address potential impacts on habitat in the river as a result of increased flow velocity. The Draft EIR and hydrology study state that 100-year velocities would <u>increase</u> in the river corridor from downstream of the existing bridge to upstream of the new bridge.

It is imperative that the hydrologic conditions that exist in the project area be studied so as to ensure that any changes due to the project will not significantly impact the existing clapper rail population. It has not been made clear in the EIR that increasing the velocities of the flow will not negatively impact the population.

3.12 Biological

The City of Del Mar is very concerned that the habitat and wildlife species in the River Valley be protected as much as possible from negative impacts. The EIR does not discuss whether the preferred alternative for building a new bridge while retaining the old bridge will impact the wildlife corridor by adding further obstructions to wildlife movement. The document does state that the new bridge will improve the function of the wildlife corridor (pages 3.12-47 and 3.12-49, #4), but it does not address the possible obstruction caused by the existing bridge that will is located to the west of the newly proposed bridge. The new bridge will be considerably higher so as to facilitate wildlife movement underneath it, but the old bridge, being so much lower, may block the movement due to the collection of debris.

Clapper Rails

All of the proposed alternatives would significantly impact habitat for the clapper rail. Due to the significance of this population in the project area it is recommended that the proposed mitigations be implemented prior to the impacts occurring for the project. This will provide substitute habitat for the rails during the construction disturbance of the river corridor.

Additionally, the project and mitigation sites should both be incorporated into a long-term monitoring program and the project should be required to implement or contribute a fair share to establishing these areas as monitoring sites.

Donna Clark, Environmental Planner City of San Diego DEIR El Camino Real Road/Bridge Widening Page 5 of 5

The City of Del Mar appreciates the opportunity to comment on the Draft EIR and hopes that you will take into consideration our comments and require the appropriate mitigation measures be included in the EIR and ultimately in the project construction. If you have any questions, please do not hesitate to contact Linda S. Niles, at 858-755-9313 x155.

Sincerely,

cc:

Criptal Crawford

Crystal Crawford, Mayor

Members, Del Mar City Council Lauraine Brekke-Esparza, City Manager Linda S. Niles, Planning and Community Development Director Tim Finnell, 22nd District Agricultural Association Lee McEachern, California Coastal Commission

CARMEL VALLEY COMMUNITY PLANNING BOARD c/o MNA Consulting 427 "C" Street, Suite 308 San Diego, CA 92101 PH: 619/239-9877; FAX: 619/239-9878 www.cvcsd.com/groups/planning.html

October 10, 2006

Donna Clark, Environmental Planner City of San Diego Development Services Center 1222 First Avenue, MS 501 San Diego, CA 92101 DSDEAS@sandiego.gov

Subject: Comments on the Draft EIR (Project No. 2982):

EL CAMINO REAL ROAD/BRIDGE WIDENING PROJECT Coastal Development Permit/Site Development Permit To Widen El Camino Real Between San Dieguito Road and Via de la Valle, Replace the Existing Bridge Over the San Dieguito River, and to Widen Via de la Valle Between El Camino Real and El Camino Real North.

Dear Ms. Clark:

GENERAL COMMENTS ON PROJECT OBJECTIVES

The proposed road/bridge construction occurs at the northern gateway to Carmel Valley. Completion and impacts of project alternatives will forever alter the subregion. Its locale---the western San Dieguito River Valley---is extremely valued by the community for its semi-rural, lowdensity, and pastoral break from development assured when much of this area was approved for housing, retail, and commercial use.

We actively support the "San Dieguito River Park Concept Plan" (approved by the City Council 2006) and its goals to preserve and restore the wetlands and uplands of this unique setting.

We understand the objectives to raise the road above the 100-year flood level and to replace the existing bridge for seismic activity. We also understand City of San Diego policy to build roads and bridges for their maximum carrying capacity. <u>However, these goals must be balanced</u> with the equally important City and State (Coastal Act) policies which set this area as a priority for preservation, for open space values as well as for this area's role in the Multiple Species Conservation Program Plan (MSCP.)

We do not believe that the City's primary criterion for the preferred 4lane alternatives for this project is appropriate. A "design speed of 55 miles per hour" in the heart of the river valley, replete with wetlands and upland habitat and endangered species, and on a road that only conveys traffic to the complicated intersections, stoplights, and the County, 2lane continuation of Via de la Valle, is excessive.

September 14, 1999 and June 11, 2002, this Board wrote to Development Services in response to this proposal:

"Our major concerns aside from the obvious traffic circulation benefit are the design and function of the new road and bridge over the San Dieguito River Valley.

"The environmental review...should consider foremost the critical importance of the locale---the western San Dieguito River Valley.

"Equally important is the opportunity to promote the 'semi-rural quality of the river valley..."

"We recommend that the overall effect of the widened road, with its slopes and berms, landscaping, and paths, should be that of a naturally occurring landform...

"...as the North City has continued to urbanize, and proposals within the river valley have come and gone, accompanied by vociferous and vehement opposition, we have learned that the river valley is most valuable to people for its visual sweep, its 'pastoral' quality

"Such landscapes are rare in coastal San Diego.

"Ten years from now, this project should not look as though a roadway was engineered and built across the San Dieguito River Valley, but, rather, as though the road had historically followed the path of least resistance, along the top of a naturally occurring causeway, winding its way through stands of upland habitat." Given the high priority of our community to preserve its few remaining open space and natural areas, the Board submits its recommendations on the scope and accuracy of the DEIR:

ALTERNATIVES CONSIDERED MUST BE EXPANDED

"Conclusions", Project Summary [S-2 and S-3] and Project Description [2-2 and 2-3] delineate the six "build alternatives" considered to merit environmental review. All of the four-lane alternatives, including the City's preferred "Eastern Alignment Alternative", would vastly increase the bulk and scale of the road and bridge from their current 23-ft. (road) and 27-ft. (bridge) widths.

The "Eastern Alignment" (City's preferred) alternative would result in a road 340-ft. long, 94-ft. wide, with the total road width at 122 ft. It would be "5-10-ft. higher" than the current road [2-2] The proposed new bridge would be built diagonally approximately 50 ft. east of the existing bridge at the south end and approximately 90 ft. east of the existing bridge at the north end. It would be 354 ft. long [2-23], 14 ft. longer than the existing bridge. Height would be "5-10 ft." above the existing bridge. Even more troubling than these numbers provided in the DEIR are recent statements made by project planners that the new road and bridge actually would be 12' higher than the existing ones.

This alignment also includes retention of the current bridge for hiking, biking, and equestrian use. This is most puzzling, since the original aim of the project was to allow unimpeded flow during a 100-year flood. The DEIR states the current bridge does not allow for possible debris passage but does allow for 100-year floodwaters to pass. All build alternatives propose channel reconfiguration, which can be part of a current bridge alternative, thus removing one justification for the "Eastern Alignment" (City's preferred.)

The DEIR provides excellent <u>visual simulations of the 4-lane alternatives</u> [Figure 3.3-7]. <u>These show, by design and by magnitude, that what is</u> proposed completely contradicts the Board's and community's requests in 1999 and 2002 for a bridge and road improvement that simulate "a naturally occurring landform...as though the road had followed the path of least resistance, along the top of a naturally occurring causeway..."

California Environmental Quality Act (CEQA) Guidelines state that an EIR "shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation."

The DEIR does not evaluate other alternatives that would have less impact on the river valley and environs while also improving circulation. Because we believe the 4-lane alternatives and bridge proposed are too massive, and because they are justified in the DEIR to provide 55 miles per hour travel capacity, we have worked with San Dieguito River Park Citizen's Advisory Committee and staff to provide two new alternatives which should be analyzed. Both of these alternatives would achieve the project goal of improving seismic protection and raising El Camino Real above the 100-year flood level. Both would include an undercrossing for equestrian use and connections from the south part of the river valley for all trail use.

• <u>"Modified Central Alignment" Alternative</u>

• "Modified Current Road/Bridge" Alternative

"Modified Central Alignment"

The "Central Alignment" described [Summary 2; S-3;2-2-5] and shown in "Visual Simulation 4" [figure 3.3-7] would feature:

.pedestrian walkway/parkway	22 ft.
.bicycle lane	8 ft.
.outside travel lane	12 ft.
inside travel lane	12 ft.
.median (solid, raised)	14 ft.
.inside travel lane	12 ft.
.outside travel lane	12 ft.
.bicycle lane	8 ft.
.pedestrian walkway/parkway	22 ft.
Total width	122 ft.

A modified version of the above would replace the old bridge and roadway with new structures in the same location as the "Central Alignment" described in the DEIR. However, the "Modified Central Alignment" would: (1) remove two travel lanes; (2) include 8-ft. bike lanes on both sides; (3) include a 6- to 10-ft. wide landscaped median, (4) include a 13ft. wide pedestrian/equestrian lane on the west side, and (5) include a 5ft. wide pedestrian walkway on the east side, reducing the width by nearly half.

Intersection improvements would vastly improve LOS conditions: extending the right-turn only lane from northbound El Camino Real onto Via de la Valle and the same onto San Dieguito Rd, and the possible use of roundabouts at some or all of the intersections. Options to improve access to and from the Polo Fields and Horsepark could include roundabouts or right-turn only improvements. Via de la Valle between El Camino Real and El Camino Real North can accommodate a fulllength third middle lane for turning south and north, with "keep clear" cuts for De Valle Place and the office complex. The Via de la Valle to El Camino Real south right turn lane also can be lengthened with minimal impacts to businesses at the intersection.

The "Modified Central Alignment" also would provide access to the Coast to Crest Trail via the 13-ft. pedestrian/equestrian lane (the equestrian portion would exist only on the bridge itself, ending at the trail) and pedestrian traffic would continue on the road. The 5-ft. wide pedestrian lane on the east side would be separated from all other traffic. Additionally, a ramp on the west side of the bridge, similar to those recently built on Highway 101 just south of Del Mar, would provide the vital connections to the equestrian/pedestrian trails in and around Gonzales Canyon and the MHPA to the east and south.

A particular advantage of this alternative is that the 1 foot of "intrusion into Horsepark Property" (state of California) [3.1-52] projected for the DEIR "Central Alignment" could be eliminated.

"Modified Current Road/Bridge "

The existing road and bridge would be modified to accomplish seismic safety and 100-year flood conditions by retrofitting, which would increase the depth of the existing piers and by increasing the slope ratios from 2:1 to 1.5:1. This would improve flow capacity.

This design would incorporate bike, pedestrian, and equestrian lanes, cantilevered over the slopes. Cantilevers would be built on both sides of the existing bridge to accommodate bikes and pedestrians on the east side and equestrians and pedestrians on the west side.

The same intersection improvements suggested in the "Modified Central Alignment" would be included.

5

SPECIFIC COMMENTS ON THE ACCURACY AND SCOPE OF THE DEIR

<u>Overview</u>

We believe that, in addition to the error of defining only a major, 4-lane roadway 122-ft. wide as acceptable, the DEIR is considerably flawed in its selective use of CEQA guidelines. With few exceptions, the CEQA categories analyzed focus on the traffic-carrying capacity of the system. In each section analyzed by us below, we cite only some of the many instances in which alternatives are shown as having CEQA impacts only if they do not improve traffic flow.

For example, "Mandatory CEQA Discussion Areas...Traffic Circulation" [4-2] states that the "Road Capacity Alternative would have significant and unmitigable impacts under CEQA for an increase in hazards to pedestrians and bicyclists, for long-term operations (LOS F)...In addition, the Central Alignment, Western Alignment, and Lower Elevation alternatives would have significant impacts under CEQA for long-term operations due to LOS E level of delay at the intersection of El Camino Real and Via de la Valle in the 2030 AM and PM peak hour."

Treated only minimally are environmental impacts. "Visual/Aesthetics", is described as: "All build alternatives except the Eastern Alignment would have view impacts that would be significant and unmitigable under CEQA from blocking a view corridor...due to the fencing needed on the outside of the cantilever equestrian trail on the west side of the bridge." In fact, cantilevered trails can be fenced with vertical pickets rather than chain link, preventing view blockage.

Visual impacts should be the same for all alternatives and significance should be based on the overall and significant visual impacts wrought by the creation of a large, 122-ft. roadway that, as proposed, looks like a industrial levee or big-city train trestle visible throughout the river valley.

<u>Comments on "Project Summary" and on "Section 1---Introduction and</u> <u>Environmental Setting"</u>

Here and throughout the DEIR, the western San Dieguito River Valley is mischaracterized as an increasingly urbanized setting; therefore, the 4lane road and bridge designs are not seen as impacts. Cumulative Effects [4-3] describes the western river valley as an area where projects being built reflect a "trend toward creating views of urban development."

The reality experienced by residents and commuters daily is that more than 600 acres of land here previously zoned for development, from I-5 to east of El Camino Real has, in just ten years, been acquired as open space. This is testimony to the uniqueness and value of this setting, one of the last of its kind in California. This has been accomplished because of the express and primary goal of the City, County, the State of California, communities, and conservation organizations to actively preserve the wetland/upland complex of the river valley.

Regarding consistency with the City's "North City Local Coastal Program Plan" the goal is to *"Preserve floodplains and significant topographic features such as canyons, ridges, and hillsides."* The 4-lane build alternatives "(do) not propose new development in the floodplain because the widened road and new bridge would be constructed in the same general corridor as the existing road and bridge." [3.1-15] <u>Replacing the current road (23-ft.wide) and bridge (27-ft.wide) with a 12-ft. higher and 122-ft. wide system is not seen to introduce a major structural intrusion into this natural setting.</u>

Similarly, because "El Camino Real and Via de la Valle are not identified as existing or proposed scenic routes." [3.1-7] the General Plan goal for roads to "emphasize aesthetics and noise reduction" is not an issue. Clearly the important role of the river valley as habitat and open space offering wide vistas as breaks from development is minimized in the DEIR.

Comments on Section 3----"Land Use"

The DEIR vastly underestimates the impacts of the fully-widened alternatives on the western river valley. The serenity of the river valley would be destroyed with the proposal to spend \$24 million on a new 122ft. wide road and bridge that would only marginally improve traveling speed at the intersection of El Camino Real and Via de la Valle---from LOS F to LOS D at the P.M. peak. Travel along El Camino Real at today's conditions, is slowed only at peak hours.

However, the 4-lane build alternatives, as described below in text indicating consistency with established land use plans, are seen only in the context of their ability to move traffic faster through this area:

Table 3.1-2, "Project Consistency with the...General Plan Transportation Element" states the primary goal for *"A transportation system that is safe*,

functional, efficient, environmentally acceptable, and aesthetically pleasing." All alternatives except the smaller or no build ones are seen to meet this goal. Similarly, the goal to have "a street and highway system whose components are consistent with the character of the area traversed and suitable for the type and volume of traffic served" is seen to be met for the simple reason that "all (larger) alternatives would provide 4 travel lanes." (emphasis added)

Both findings clearly emphasize the increase in road capacity and ignore the goal texts emphasizing *"environmentally acceptable and aesthetically pleasing"* and *"consistent with the character of the area traversed."*

The transportation goal to "Respect the natural environment and scenic character of the area traversed" is judged to be met by all alternatives because trees, shrubs, and plants would be planted on manufactured slopes.

<u>Project Consistency with the General Plan Open Space Element [3.1-7]</u> refers to the goal of "The installation of public and private improvements in designated open space areas <u>should respect the natural environment to</u> <u>the maximum extent possible.</u>" (emphasis added) Again, the bulk and scale of the proposed 4-lane, 122-144-ft. wide alternatives are not seen as an impact on the western river valley.

The DEIR discussion of Project Consistency with Other Policies/Plans [3.1-33 – 3.1-47] continues this theme. The "NCFUA Framework Plan established that "Within the 100-year floodplain fringe of the San Dieguito River Valley, fill for roads...will be permitted only if such development is consistent with the policies detailed in the North City Local Coastal Program Plan whose goal [3.1-15] is to "preserve floodplains..."

In these and numerous other places in the DEIR the build alternatives are seen as having a neutral impact on the river valley because a road and a bridge already exist in this location.

In our view, the critical goals to not impose new development and visual and structural impediments in a mostly natural setting are ignored.

Section 3.1.3.4, "Conflict with Environmental Plans or Policies" should be revised to reflect the San Diego City Council acceptance of the "San Dieguito River Park Concept Plan" (2006.) The Concept Plan is merely described as "prepared to formally establish the vision and goals for the future use of the...river valley." The EIR should better describe the plan's goals: only the goals for the "floodplain" and "conservation" are listed. The EIR should emphasize the major Concept Plan goal for "Special Design Considerations" for this area [p. 41]:

"Due to the special characteristics within the Del Mar Coastal Lagoon Landscape Unit...

.the sweeping open space views within this landscape should be protected.

.future development should be compatible with the open space character of the lagoon area in terms of both visual compatibility and intensity of use.

.view opportunities of the lagoon and ocean from trails and existing circulation routes should be preserved and, where appropriate, enhanced."

Comments on "Traffic Circulation" [3.2-1 – Figure 3.2-6]

Justification for the road/bridge widening includes "The Series 10 Long-Range (2030) modeling of traffic volume projections..."

Section 3.2.2.2 describes "Existing Traffic Volumes and Levels of Service." Noting that the current road segments except for El Camino Real North operate at LOS F, the DEIR takes as its basis existing traffic volumes "obtained by counts conducted in July 2003."

Since July 2003 much new development has occurred both in the immediate Carmel Valley area and Pacific Highlands Ranch vicinity, as well as in the large developments to the east and south---Torrey Highlands; Del Mar Mesa; Camino Del Sur, etc. All of these developments would feed traffic into the project area, so, presumably, the traffic counts would be much higher today than in 2003. <u>The proposed increase over today's traffic may be significantly less than the increase from 17,000 to 28,000 ADT depicted.</u>

The final EIR should thoroughly analyze the difference between traffic volumes counted in 2003 and in 2006.

<u>Comments on Visual/Aesthetics</u> [3.3-1 – Figure 3.3-15]

Although the DEIR, commendably, treats potential visual and aesthetics impacts with detail, we cannot agree with the DEIR conclusions that the impacts of the City's proposed 4-lane alternatives---especially the City's preferred Eastern Alternative---are benign. "Visual Simulation #3" [Figure 3.3-6] compares the proposed, 12-ft. higher, 94-ft.-wide bridge with the current, 27-ft. one. Although aesthetics and visual quality are somewhat subjective, no one of us reviewing this project and seeing this visual simulation can agree with the DEIR conclusion that: "the overall visual quality and character remains the same...Though some views to the east would be blocked by the development of the new bridge, these views were limited to road drivers that would be traveling on the new bridge with increased views to the east and west."

The visual simulations also well represent a design flaw, in our view. The box girder bridge design simply is not compatible with the aesthetics goals of the river valley park. The existing bridge with arched underpinnings and a less massive appearance is far more pleasing and consistent with the early California feel of the river valley. The design proposed here, with its 12-ft. "apron" would be at home in an industrial or a downtown setting, or an open freeway setting but is inappropriate in the historic El Camino Real.

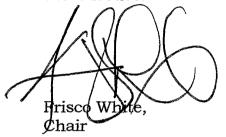
Comments on "Biological Resources" [3.12-1]

"The Natural Environment Study Report for the El Camino Real Road/Bridge Widening Project" included by reference in the DEIR states that this project will not include a wildlife undercrossing because the project is north of the existing culvert. A wildlife undercrossing is required by MHPA guidelines and, although this project is north of the existing box culvert, this proposal would significantly impact wildlife and habitat in the MHPA and river valley. Loss of habitat would occur with any of the build alternatives, and, to a lesser extent, with our suggested 2-lane-plus alternatives, as well. An undercrossing at El Camino Real is now a City of San Diego CIP project, although only the engineering and application processing are now funded. Therefore, it seems appropriate that this road and bridge project contribute to this undercrossing, given project impacts that will further limit and/or destroy wildlife access to nests, homes, and food.

SUMMARY

The DEIR does not reflect the reality of the western San Dieguito River Valley and its environs. The "trend toward urbanization" used to justify a new road and bridge of large proportions has been reversed through local, state, and conservation efforts. Environmental review of any proposed road or other improvements in this area should thoroughly underscore the threats to this rare environment, one so important to surrounding communities and so critical to wildlife, interconnected corridors which support this wildlife, and to unique vegetation nearly depleted in this City and County.

A final EIR on a project to improve travel on El Camino Real must reflect these issues.



Jan Fuchs/Anne Harvey, Co-Chairs Regional Issues Subcommittee

Cc: Council President, Scott Peters Jim Waring, Mayor's Office Bernard Turgeon, Senior Planner San Dieguito River Valley Joint Powers Authority

SAN DIEGUITO PLANNING GROUP P.O. Box 2789, Rancho Santa Fe, CA 92067

October 12, 2006

Ms. Donna Clark Environmental Planner City of San Diego Development Services Center 1222 First Avenue, MS 501 San Diego, CA 92101

RE: Draft Environmental Impact Report – JO 119733 El Camino Real Road / Bridge Widening Project

Dear Ms. Clark:

The San Dieguito Planning Group (SDPG) of the County of San Diego appreciates having the opportunity to respond to the Draft EIR for the El Camino Real Road / Bridge Widening Project.

After review and discussion at our Public Meeting October 12, 2006 the SDPG requests that the City of San Diego staff reconsider the options proposed in the EIR and add several alternatives. This expanded analysis of the concept should include the following items:

- Keeping El Camino Real and the bridge across the San Dieguito River at the current 2 lane configuration (one lane each way) to support the rural character found in this area and to preserve the scenic beauty of the proposed River Park which it transects.
- Rebuild the aging bridge in the same configuration as it is currently found with the same placement. In its new rebuilt form additional space can be added to support equestrian, pedestrian and bike user pathways to support use by the River Park.
- Evaluate placing round-abouts at the intersections on Via de la Valle instead of the current stop light configuration. In the near-term this configuration will facilitate improved traffic flow and in the long-term the additional land acquired for the round-abouts will facilitate any increased capacity changes required.

The San Dieguito Planning Group would like to request that one key aspect of the study be enhanced, namely the review of the effects of restricting the flow of water during the 100 year flood with the new proposed raised road bed and bridge and the effects upstream on the surrounding areas in both the City of San Diego and the Unincorporated areas in the County of San Diego. We are concerned that 100 year flood water restrained up stream behind this new configuration could move water up into areas, with homes, normally not considered part of the active flood plain simply because of the volume of water moving toward the ocean backing up behind the road bed and bridge as currently proposed. The San Dieguito River Valley has been flooded side to side several times in the collective memory of the SDPG members. Consider too that in this same time frame we have not yet experienced the 100 year flood. Homes in the areas of Sun Valley,

SAN DIEGUITO PLANNING GROUP P.O. Box 2789, Rancho Santa Fe, CA 92067

Page 2

Fairbanks Ranch, Whispering Palms and the new residential construction in the El Apajo area could be severely impacted by water seeking a path to the ocean, restrained by the proposed configuration of road and bridge. The Planning Group requests City Staff to conduct an in depth review of the river valley at several locations including sites in the Sun Valley area, at the Fairbanks Country Club, at Morgan' Run, at the proposed El Apajo Bridge and at Chino's Farm relative to the elevation of the new raised El Camino Real road bed.

We request your hydrology consultant consider further the impact of having additional, restrained water, caused by the new road and bridge configuration, added in on top of the normal flow from the 100 year flood event and its potential impact on areas up stream. We are concerned that projects and homes have been approved and built in the areas potentially impacted. Steps need to be taken to mitigate the impact on these homes now, before the major flood event finally arrives.

Thank you for your consideration.

Sincerely

Paul Marks, Chair San Dieguito Planning Group



Santa Fe Irrigation District P.O. Box 409 • Rancho Santa Fe, CA 92067-0409

October 15, 2006

Donna Clark, Environmental Planner City of San Diego Developmental Services Center 1222 First Avenue, MS 501 San Diego, CA 92101

RE: Project No. 2982, SCH No. 1999071104

Dear Donna;

The Santa Fe Irrigation District has received a copy of the draft Environmental Impact Report JO. 119733 for the proposed EL CAMINO REAL ROAD/BRIDGE WIDENING PROJECT. The District has reviewed the document and offers the following comments:

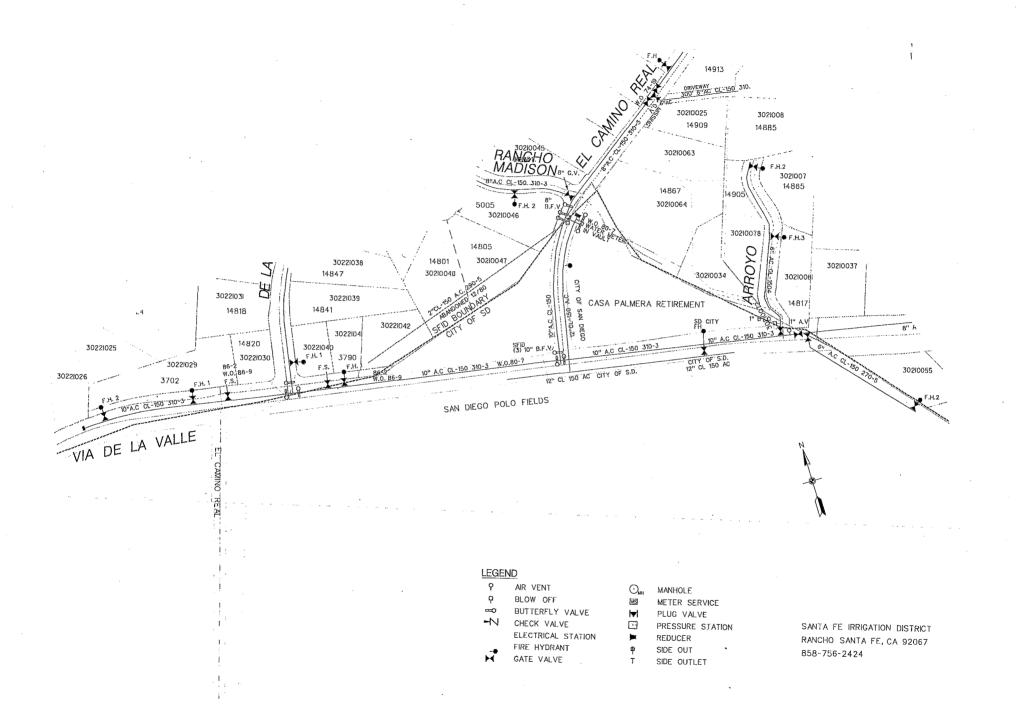
- 1. The District has an existing 10" ac waterline in Via de la Valle between El Camino Real North to about 500 feet west of the intersection of Via de la Valle and El Camino Real South (see attachment). This serves the commercial area on the north side of Via de la Valle as well as Mary's' Tack Shop and the All Creatures Animal Hospital. We serve fire protection for those areas. This line was install in about 1980 and does not need to be replaced. The commercial area at Via de la Valle Place is actually in our District. This was not identified in Section 3.6.2.1 Existing Public Utilities and nor Section 3.6.3.1 Issue 1 Impacts on Public Utilities/Services during construction.
- 2. Section 2.2.1 identifies the replacement of an existing corrugated metal storm drain that runs under Via de la Valle at El Camino Real North would be replaced with a concrete box sized to pass a 100-year flood from upstream. The District needs to be involved in this process to insure that our facilities are protected in place. Should our 10 inch water line be in conflict, the District assumes that it will be relocated within the cost of this project.
- 3. The District is currently working on its Integrated Water Resources Plan (IRWP) which will include evaluating the development of a recycled water and raw water system to serve customers as an alternative irrigation system. Since the IWRP will not be complete by October 22, the District will not have evaluated if customers in this area would qualify for recycled water or raw water. Should this area become a potential site for one of the two new systems, the District would be interested in installing the new system in connection with the project.

All correspondence to the District should be addressed to:

Dana Johnson, Engineering Manager Santa Fe Irrigation District P.O. Box 409 Rancho Santa Fe, Ca 92067-0409 858-756-2424 858-756-0450 fax 858-414-9978 cell djohnson@sfidwater.org

Sincerely, mar

Dana Johnson Engineering Manager





SAN DIEGO AUDUBON SOCIETY

4891 Pacific Highway, Suite 112 • San Diego CA 92110 • 619/682-7200

October 17, 2006

Donna Clark City of San Diego Development Services Center 1222 First Avenue, MS 501 San Diego, CA 92101

Re: Project #2982 - El Camino Real Road/Bridge Widening

Dear Ms. Clark:

Thank you for the opportunity to comment on the proposed widening of El Camino Real (Project Number 2982). The San Diego Audubon Society (SDAS) fosters the protection of birds and other wildlife through education, study and advocacy and supports the preservation of native habitats throughout San Diego County.

SDAS is opposed to this project because of its potential impact on a large clapper rail population in the immediate vicinity and the effect of the wider road on the view and character in this scenic, already highly developed portion of the San Dieguito River Park. We would further like to make the following comments:

In the draft EIR, the City fails to adequately address both the significance of the third-largest population of clapper rails, a federally-listed species, residing in the area under and immediately adjacent to the existing El Camino Real bridge and the likelihood that any disturbance in this area will disperse that population, probably permanently. Clapper rails are year-round residents, already constrained to small pockets of productive wetlands with suitable vegetation for cover. For this reason, it is highly unlikely they will find similar habitat anywhere near the current location. The San Dieguito Lagoon restoration project cannot be counted on to provide suitable clapper rail habitat for a great many years under the best scenario, and the perilous condition of the species makes the proposed impacts to this population, in SDAS' opinion, unmitigable. If any variant of the proposed project does go forward, however, the City should complete mitigation for the impacts to clapper rail habitat long enough before construction that the replacement habitat has fully matured and is well occupied by clapper rails before any disturbance to the existing habitat is allowed.

An urban thoroughfare of the proposed scale is neither suitable for the current location nor will it maintain the open, semi-rural character of this section of the San Dieguito River Park. The route already crosses an area of sensitive biological resources and scenic beauty in the most heavily populated part of the Park. This is even more reason to maintain the natural character of the viewshed for the benefit of local residents and the thousands of travelers who have the chance to gaze on the soon to be restored lagoon as they pass by on the I-5 freeway. Nearly \$100 million is being spent to restore the Lagoon as a functioning wetland; the proposed widening would be an unnecessary blight on this effort.

Discussions with the City revealed that the original impetus for this project was the need to modify the current bridge to meet 100-year flood standards. The subsequent additions to the project to improve traffic flow on El Camino Real and Via de la Valle – an already heavily contested proposal – are unrelated and unjustified. Instead, the proposed widening will facilitate urbanization, bringing with it the associated problems of air pollution due to increased vehicular emissions, degradation of water quality due to contaminated runoff, trash, and noise. This is not only contrary to the less congested character of the area but also to the River Park plan to preserve natural habitat areas for the protection of native species and the enjoyment of nature enthusiasts.

At a time when the City can ill afford to waste financial resources, we strongly suggest the City revisit its circulation plan and take into consideration changes that have taken place over the past two decades, particularly the establishment of the San Dieguito River Park. The Lagoon area is already developed beyond what is compatible with a natural river park. We request that an Environmental Impact Report be prepared with alternatives for modifying the existing bridge to meet flood control requirements without further compromising the value of this natural corridor. We also urge City planners to better coordinate with San Dieguito River Park staff in designing bike paths that are suitable for commuters separate from the roadways in the lagoon area, to lessen the need for wider roads and improve bicyclists' safety.

Please feel free to contact me at (619) 224-4591 if you have questions regarding this comment letter.

Respectfully,

James A. Peugh

Chair, Conservation Committee

CC:

Carolyn Lieberman, US Fish and Wildlife Service Elizabeth Lucas, California Department of Fish and Game Terry Dean, Army Corps of Engineers Bruce Posthumus, Regional Water Quality Control Board

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Peter B. Smith Association Manager

October 19, 2006

Rancho Santa Fe Association Post Office Box A • Rancho Santa Fe, CA 92067-0359. (858) 756-1174 • FAX (858) 756-9814

www.rsfassociation.org

Mark McClure, President Diane Larsen, Vice President Jack Queen, Secretary Gail Frazar Ken Markstein

> Robert I. Green **Building Commissioner**

Ms. Donna Clark, Environmental Planner City of San Diego Developmental Services Center 1222 First Ave., MS 501 San Diego, CA 92101

DEIR JO: 119733 - Proposed El Camino Real Bridge & Roadway Expansion & Re: **Re-Alignment**

Dear Ms. Clark:

The Rancho Santa Fe Association is opposed to the new bridge, road expansion and realignment proposed for El Camino Real within the San Dieguito River Valley. The EIR has failed to consider viable alternatives, including the establishment of roundabouts at the intersections of Via de la Valle/El Camino Real and San Dieguito Road/El Camino Real, as a far less intrusive and effective method for increasing capacity, enhancing safety and protecting environmental and aesthetic values.

As with the plan to expand the adjacent Via de la Valle roadway segment (see enclosed letter), the proposal to widen EL Camino Real will merely create four lanes feeding into two lanes. A dubious benefit especially in light of the significant negative impacts to the preservation of the environmental/open space values associated with the San Dieguito River Park's "coast to crest" trail. Further, the EIR does not consider the ramifications of the San Diego County Board of Supervisors recent action to endorse the re-connection of El Apajo Road to Via de la Valle in the Circulation Element of the County's General Plan. This and the other numerous traffic, circulation, development and other material changes that have occurred in the area since the original plans to expand the roadway and build a new bridge were developed so many years ago, need to be accounted for in a new comprehensive traffic study. In light of the approved El Apajo re-connection and the roundabouts alternatives, what are the traffic circulation impacts on Rancho Santa Fe and surrounding areas with and without the project and with and without roundabouts and the re-connection of El Apajo Road to Via de la Valle?

The EIR needs to consider the cumulative effect of the project in conjunction with the proposed widening of Via de la Valle, and also the traffic impacts on Ranch roads which have not been assessed by the EIR. These are serious deficiencies.



Is there really a need and justification for such an expensive and intrusive project in such a sensitive area? In light of all the changes that have occurred subsequent to when the project was originally considered and proposed, a careful evaluation of all the issues, including all traffic circulation impacts and mitigations, need to re-assessed and fully disclosed. The Association joins with the other numerous groups, organizations and communities in opposing the proposed development and in questioning the adequacy of the EIR.

Thank you for the opportunity to comment on these issues.

Sincerely. Kenneth W King Jr.

President

Encl: Letter dated July 20, 2006

Cc: Supervisor Bill Horn Supervisor Pam Slater-Price Council President Peters Dick Bobertz, San Dieguito River Park Paul Marks, SDPG Dave Abrams, Fairbanks Ranch

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> Robert J. Green Building Commissioner

July 20, 2006

Marilyn Mirrasoul Environmental Planner City of San Diego Development Services Center 1222 First Avenue, MS 501 San Diego, CA 92101

Re: Comments on Via de la Valle Street Widening Recirculated Mitigated Negative Declaration Project No. 12657, SCH No. 2005061089

Dear Ms. Mirrasoul:

The Rancho Santa Fe Association is opposed to the widening of Via de la Valle to four lanes between San Andres Drive and El Camino Real. This proposed widening is unnecessary and detrimental to the character of the community.

East of the proposed project site, Via de la Valle is classified as a two lane road on the County Circulation Element, and there are no plans or intentions for expansion now or in the future. The situation is likewise to the north with El Camino Real. Therefore, any widening of Via de la Valle within the City of San Diego adjacent to the County portion of the road will not ease the flow of traffic or increase overall roadway capacity. The resulting benefit to drivers would be minimal to nonexistent.

Widening Via de la Valle would also be detrimental to the rural character and the natural environment of the San Dieguito River Valley. Via de la Valle is identified as a "scenic drive" within the San Dieguito River Park, and is the gateway into the Rancho Santa Fe Covenant, where the narrow, rural, and winding character of the roadways is a major reason for the community's Cultural Landscape designation by the State of California in addition to its Historic Landmark status. Expanding Via de la Valle to a 4 lane road would suburbanize this corridor, destroying the character of the surrounding community.

In addition to the scenic and cultural reasons for maintaining the existing 2 lane roadway, Via de la Valle is immediately adjacent to the San Dieguito Lagoon restoration project. Any expansion of the roadway could potentially impact sensitive habitat and environmental resources.

ART JURY

For the above reasons, the Rancho Santa Fe Association strongly opposes the proposed widening of Via de la Valle, and urges that a full EIR analysis be conducted to determine the potential impacts of the project.

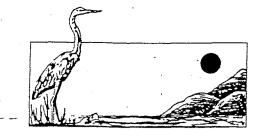
Thank you for your consideration of these comments. If you have any questions about the Association's positions, please contact me at (858) 756-1174.

Sincerely,

Kee Keith Behner

Planning Director

Cc: Supervisor Horn Supervisor Slater-Price Council President Peters Dick Bobertz, San Dieguito River Park Paul Marks, SDPG Arnold Torma, Katz-Okitsu and Assoc.



Friends of the San Dieguito River Valley

P. 0. Box 973 Del Mar CA 92014

October 19, 2006

Donna Clark, Environmental Planner Development Services Center City of San Diego 1222 First Avenue, MS 501 San Diego, CA 92101

SUBJECT: COMMENTS ON THE DRAFT EIR (Project No. 2982) EL CAMINO REAL ROAD/BRIDGE WIDENING PROJECT

The Friends have reviewed the draft EIR and respectfully submit the comments below. The Friends was established in 1986 as an incorporated volunteer citizens group to advocate for the preservation of the San Dieguito River Valley and have been involved since that time in providing community input.

GENERAL COMMENTS:

Although we understand the need to improve the existing El Camino Real Bridge, we are concerned that the draft EIR ignores and even mis-states regional efforts to preserve and, where possible, restore the open space-river valley environment in the area of the proposed project. In our opinion there are two glaring inaccuracies in the Draft:

1. The Report finds that city-owned property currently leased by the San Diego Polo Club is not public and therefore exempt from provisions of Section 4.10 (f) of the NCFUA Framework Plan which does not allow development to block public views. In fact the property leased by the Polo Club is preserved public open space (Fairbanks County Club Specific Plan, City of SanDiego, 1982; Fairbanks Country Club EIR, City of San Diego, 1982; the Corporation Grant Deed for the property, City of San Diego, 1983, and the Club's Lease Agreement with the City of San Diego, 1986). The current lease is set to expire in 2012. It is expected that this *temporary* lease will not be renewed and the property will no longer be limited to a "select group of paying

customers" (to quote the draft EIR). This inaccuracy in the Draft EIR must be corrected and related findings re-evaluated. For instance the finding (Section 4.3.4)

that all build alternatives *except* (emphasis ours) the Eastern Alignment Alternative have unmitigable impacts, must be re-evaluated because the Eastern Alignment does in fact block a significant public view. <u>Therefore, based on the City's own analysis, it appears</u> that ALL the alternatives have unmitigable impacts and new build alternatives must be developed.

2. The Report finds that the area "reflects a trend toward creating views of urban development" when in fact community groups and local governments, including the City of San Diego, have worked tirelessly over the past 20 years to secure private donations and public funds to acquire and preserve open space in this area. These acquisitions along with plans for restoring significant acreage to its natural habitat reflect a trend toward preserving views of the river valley open space (NOT views of urban development). Finally, the City of San Diego has adopted the San Dieguito River Park Concept Plan that calls for protecting "the sweeping open space views within this landscape" and assuring that "future development (is) compatible with the open space the lagoon area in terms of both visual compatibility and intensity of use" character of and "view opportunities of the lagoon and ocean from trails and existing ciruclation routes (are) preserved " The draft EIR does not give appropriate weight to these goals.

(In this regard, Table 4-1 Cumulative Projects should be corrected to include the 275 acres of permanent public open space provided in the Fairbanks Country Club Specific Plan and the acres rezoned to Open Space as part of the Villa Paraiso Project.)

SPECIFIC COMMENTS:

1. The Friends do not support retaining the old bridge AND constructing a second bridge. In fact we are puzzled that the Draft EIR identifies the project goal as providing seismic and flood protection (as well as protecting environmental goals) and then preceeds to identify a preferred alternative that keeps the (presumably unsafe) existing bridge in place and builds a second higher, wider and longer bridge. Doing so would appear to actually double the obstruction of water flow during flooding, as well as more than double the amount of structures in the River Valley viewshed. Additionally Simulation #3 (Eastern Alignment) shows that the new raised bridge/roadway would block an important public view corridor to the east from the existing bridge which is proposed to be used by nonvehicular traffic, i.e. the sight-seeing public.

Also, Simulation #3 seems at odds with the description of the preferred Eastern Alignment bridge as three feet (36-inches) higher than the existing bridge. In the simulation "a 42-inch high fence for pedestrian protection" appears to be much lower than the new bridge. How high is the bridge in the Eastern Alignment Alternative? It would be helpful to have the alternatives pictorially superimposed over the old bridge to clarify the actual heights and impact of the project on public views and the semi-rural character of the River Valley in the area of the proposed project.

2. Via de la Valle in the area of the proposed project IS identified as part of the San Dieguito River Park Scenic Drive in the River Park Concept Plan (Figure 3D, page 37) adopted by the City of San Diego. The statement in the Draft that "...Via de la Valle (is) not identified as (an) existing or proposed scenic drive is incorrect.

3. Whereever an alternative alignment takes away public open space, that loss must be replaced with comparable public open space in the area. For instance, this was not addressed in the Eastern Alignment analysis even though there would be a loss of public open space for a new right-of-way.

4. Re-evaluate the need for a new signalized intersection at the Horse Park entrance since it is likely the property currently leased to the Polo Club will become open to the public "at all times" for **non-commercial** uses as specified in the deed restrictions and Specific Plan. Further, a signalized traffic light would have a negative impact on the predominantly semi-rural use and feeling of the area.

UNRECOGNIZED HISTORICAL TRAIL

The Friends bring to your attention a specific area of possible historical value that is not considered in the Draft Report: a remnant of the oldest site in the River Valley, the trail of Gaspar de Portolà's 1769 expedition to create bases along the California coast. The remnant is located within the El Camino Real right of way at the southern end of the existing bridge at the exact location of the proposed project's staging area (Figure 3.1-1). We have attached specific information and photographs from our research, for your review. Assuming the written record confirms our findings it is essential to preserve this fragile vestige of a fabled road critical to the history of the region.

The following passage is in the diary of Juan Crespi, who accompanied de Portola:

"We pitched camp near a large pool of good fresh water, which the soldiers called Well of Ozuna, and which we called the valley of San Jacome de la Marca. As soon as we arrived, about 18 Indians came to visit us, with their women and children, all very affable and not at all noisy. It seems this place is near the sea, judging by our view of it aas we came down the valley. The hills that surround this valley are not very high, and all are of pure earth, covered with pasture, the only thing lacking to the site being trees."

MINOR CORRECTIONS: 1) Correct spelling to San Andres, not Andreas and 2) there is no Villages Stallions Crossing that we are aware of; there is the Villas at Stallions Crossing on El Camino Real.

SUMMARY:

The Draft describes the visual setting of the proposed project thusly: "The presence of open water, natural landforms and the distant ocean all combine to provide a high quality

visual setting unique in the San Diego region (Section 3.3.2.2)", but inexplicably concludes that "overall, the set of projects (in Table 4-1) evaluated indicate a trend toward creating views of urban development, including buildings, paving, and more visible structure..." As noted above, this conclusion is incorrect. Table 4-1 should be also be corrected to include the 275 acres currently leased to the Polo Club and the soonto-be-restored open space adjacent to the Villa Paraiso as "permanent Open Space", and the last sentence in the Cumulative Effects paragraph amended to reflect that in fact there is a trend to preserving the open space visual setting and restoring natural habitat in the area of the proposed project.

The preferred Eastern Alignment alternative would not only vastly increase the bulk and scale of the bridge-blocking views from the preserved public open space to the east - but would also significantly decrease natural habitat areas and leave the existing bridge considered an impediment during a 100-year flood and seismically unsafe - in place. We support the suggestion by both the San Dieguito River Park and the Carmel Valley Community Planning Board to modify the Central Alignment and Current Road/Bridge Alignment as more appropriate alternatives.

The Draft EIR is a very thorough and comprehensive document. We hope the City will respectfully consider our comments and, most importantly, work closely with both the River Park staff and the Community Planning Board in order to more clearly reflect the reality of this incomparable open space river valley.

Sincerely. Jacqueline Winterer, President

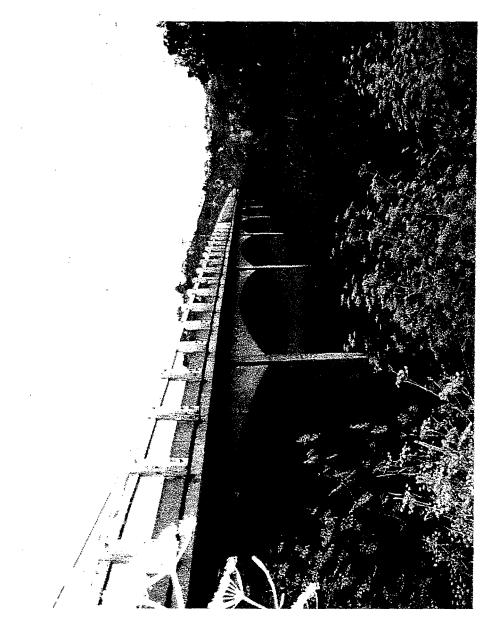
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Ann Gardner, Vice President

Attachments:

- 1. Report 1a EL CAMINO REAL prepared by the Friends of the San Dieguito River Valley, August 7, 2006
- 2. "Trying to save a slice of history," North Coast Times column by Peter Kaye, October 15, 2006
- 3. Figure No. 3D, Scenic Drive Alignment, San Dieguito River Park Concept Plan



Old El Camino Real

FSDRV Attachment

Old El Camino Real in the San Dieguito River Valley

Report 1a Prepared by the Friends of the San Dieguito River Valley 7 August 2006 The crossing of the San Dieguito River by El Camino Real is the oldest site in the whole of the San Dieguito River Valley for which there is a written record. It is imperative to preserve this fragile vestige of a fabled road critical to the history of the region. Unless efforts are made it will disappear.

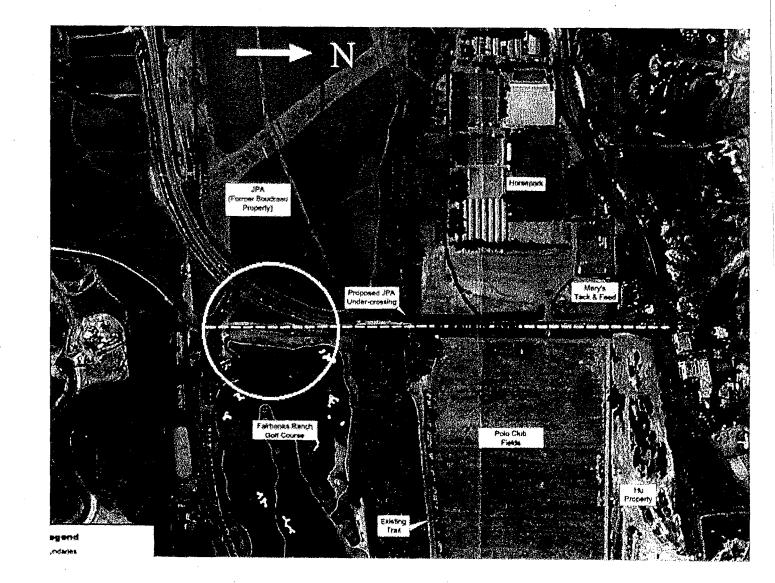
Gaspar de Portolá, a soldier in the Spanish army, was appointed Governor of Las Californias from 1768 to 1770. Starting in 1769, Portolá led an expedition to create bases along the California coast from San Diego to Monterey. His party of 63 left San Diego on July 14, 1776, 64 following age-old indian trails which eventually became the route of El Camino Real. The road, during its active life, was a carefully cleared trail which traversed the length of Southern California, connecting population centers, including misssions, and providing access to food, water and lodging for travelers.

The following passage in the diary of Father Crespi, who accompanied de Portolá, has been identified by Richard F. Pourade in *The Explorers* (1960) as a description of the San Dieguito Valley:

"We pitched camp near a large pool of good, fresh water, which the soldiers called Well of Ozuna, and which we called the valley of San Jacome de la Marca. As soon as we arrived, about 18 indians came to visit us, with their women and children, all very affable and not at all noisy. It seems that this place is near the sea, judging by our view of it as we came down the valley. The hills that surround this valley are not very high, and all are of pure earth, covered with pasture, the only thing lacking to the site being trees."

EIR 1-2

This photograph shows a small portion of El Camino Real on the western boundary of Fairbanks Ranch Golf Course. It is from map 1-2 of the El Camino Real Road Widening Project EIR (2006). This segment was abandoned when El Camino Real was relocated in the 1970s. It is a likely location of Portolá's El Camino Real,



PICT0247a

View towards the North from presently used, asphalt segment of Old El Camino Real, across San Dieguito Drive and continuing North on what is possibly a segment of the "ancient" El Camino Real, now a dirt road.

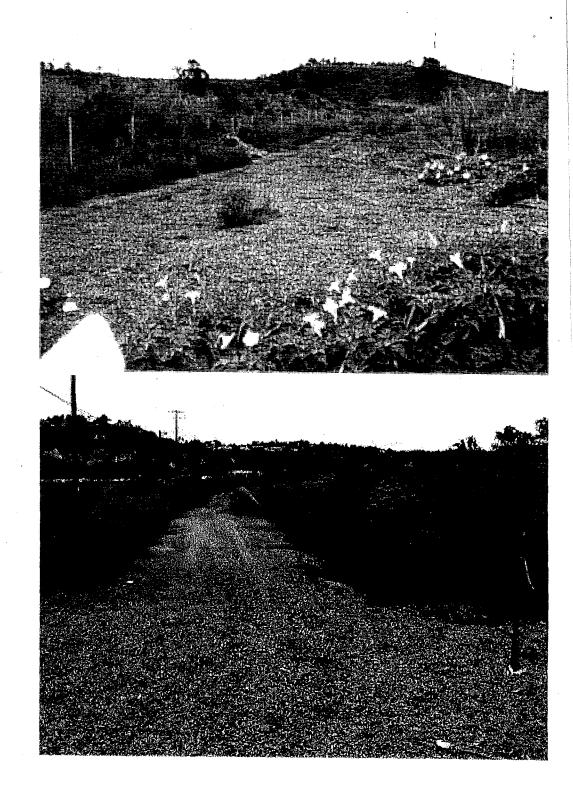


PICT0242

Looking South. View from the south bank of San Dieguito River of "ancient" El Camino Real segment.

PICT0245a

Looking North. View from San Dieguito Drive at what is probably the "ancient" or original El Camino Real.

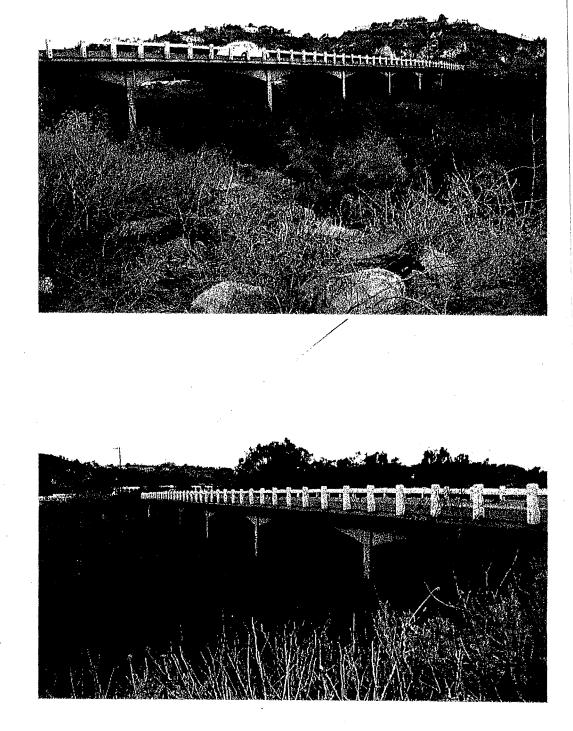


PICT0240

Looking NNW. View of El Camino Real Bridge from the southern bank of the San Dieguito River.

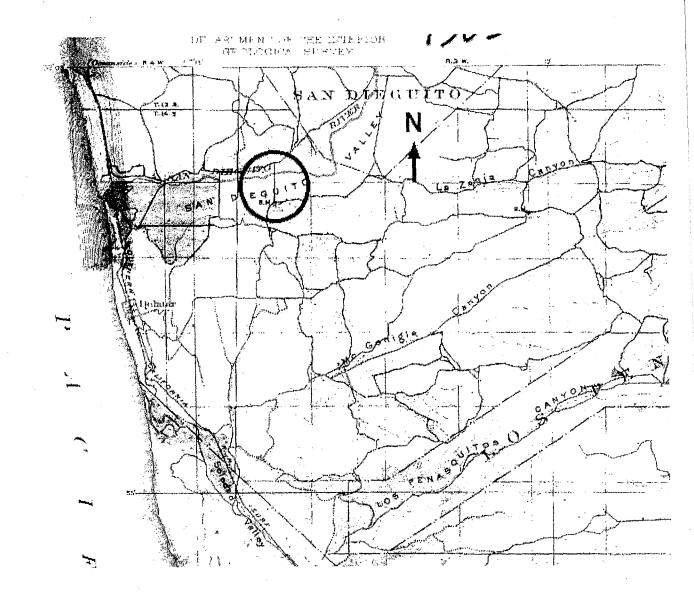
PICT0244

Looking NNE. View of El Camino Real Bridge from the southern bank of the San Dieguito River.



USGS1903

The trace of old El Camino Real across the San Dieguito River is plotted on the USGS topographic map drawn in 1903.



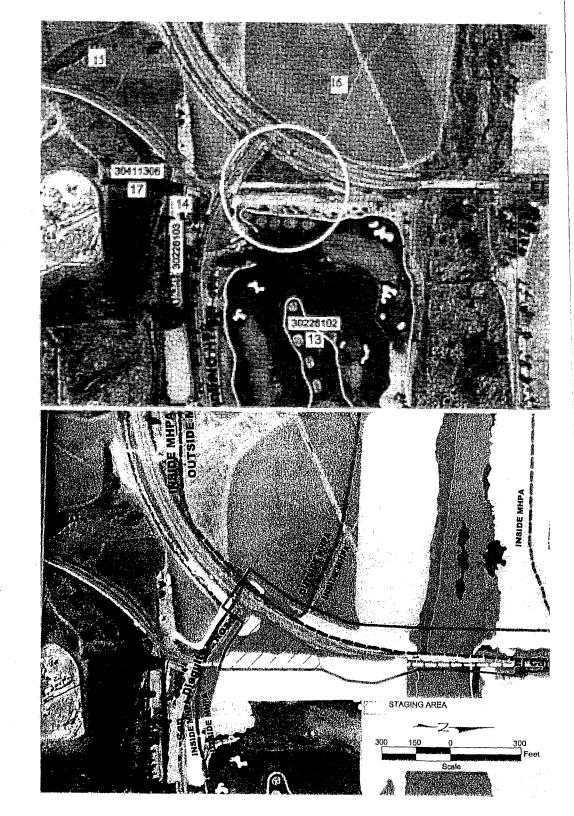
EIR 3.1-1

Tax records indicate this segment of old El Camino Real is not privately owned. The small triangle of land west of it is privately owned, but the parcel number is unknown,

EIR 3.4-1

The EIR (Fig.

3.4-1, El Camino Real Widening Project, Area of Potential Effect) indicates that the current plan is to use the short segment of old El Camino Real and the triangular area to the west as a construction staging area.



Prepared by J. Winterer, Mary Farrell,and Bill Farrell



FRIENDS of the SAN DIEGUITO RIVER VALLEY

JACQUELINE WINTERER

Research Geologist Em., Scripps Institution of Oceanography Friends of the San Dieguito River Valley President

> 289 Ocean View Ave Del Mar CA 92014 (858) 755 4460 jmwinterer@ucsd.edu



8

SUNDAY, OCTOBER 15, 2006

ocean view Trying to save a slice of history

It's not much to look at — just 800 feet of dirt road — and today it's used mostly by horseback riders fording the San Dieguito River. But this stretch of the original El Camino Real has a pedigree dating back to 1770, and that's why Friends



San Dieguito River Valley are trying to save it. It is imperative to preserve this frag-

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PETER KAYE

road critical to the history of the region," the organization argues, "Unless efforts are made, it will disappear."

Leading the charge is Friends President Jacqueline Winterer, who is challenging the city of San Diego's plan to realign the present El Camino Real and widen its bridge over the river.

With four lanes, a 14foot median and trees on either side of the road, she says, the city's project would be bigger and bulkier than necessary. What's worse, it would jeopardize its ancestor. The original El Camino Real parallels the present road a few feet to the west. The south end may be wiped out if it becomes a staging area for construction, Winterer fears, and the north portion would be buried under the city's realignment.

Newcomers to the state and longtimers who've forgotten their fourth grade lessons should be reminded that El Camino Real is a vital part of California's history. Meaning "royal road" or "king's highway," El Camino Real was established by Gaspar de Portola, a Spanish soldier and governor of California from 1768 to 1770.

Following old Indian trails, Portola's expedition of 63 left San Diego in 1770 and established a route that eventually linked missions all the way to Monterey.

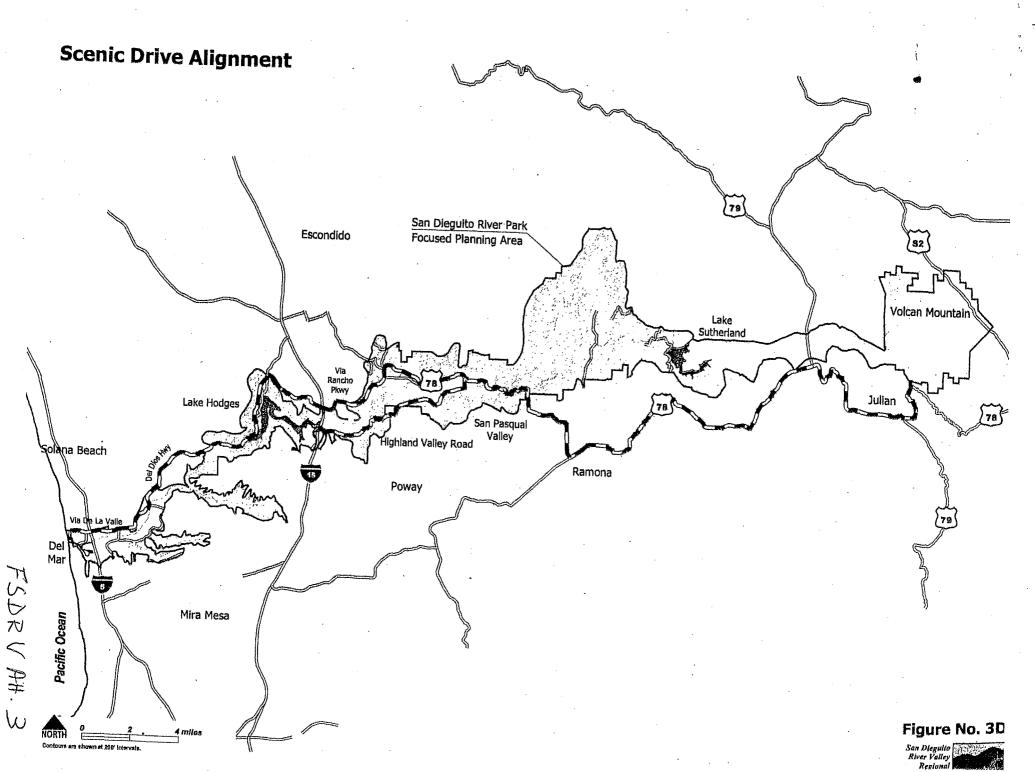
Father Juan Crespi, a Franciscan monk who accompanied the party, wrote this description of the San **Dieguito Valley: "We** pitched camp near a large pool of good, fresh water which the soldiers called Well of Ozuna and which we called the valley of San Jacome de la Marca. ... It seems this place is near the sea, judging by our view of it as we came down the valley. The hills that surround this valley are not very high, and all are of pure earth, covered with pasture, the only thing lacking to the site being trees.?

To bolster her case, Winterer asked Alan Brown, a scholar who has translated Crespi's writings, to map the path of El Camino Real across San Dieguito Valley. From San Dieguito Road northward to the river, it coincides with the dirt road under discussion.

Attachment

Contact Peter Kaye at peterfkaye@aol.com.

FSDRU



From:"Dana Johnson" <djohnson@sfidwater.org>To:<DSDEAS@sandiego.gov>-___Date:10/19/2006 7:48:16 AMSubject:Comments on EIR for City of San Diego El Camino Real Road/bridge Widening Project

Donna; Attached you will find the Santa Fe Irrigation District Comments concerning the EIR for the EI Camino Real Road/Bridge Widening Project.

If you have any questions, please call me at 858-414-9978

I will be on vacation from 11:00 am Thursday Oct 19 thru Tuesday October 24 and returning to work on Wed Oct 25. I will have my cell phone on and have access to my computer

Thanks

Dana Johnson Engineering Manager P.O. Box 409 Rancho Santa Fe, CA 92067-0409 858-756-2424 858-756-0450 fax 858-414-9978 cell djohnson@sfidwater.org

Allen Matkins

Allen Matkins Leck Gamble Mallory & Natsis LLP Attorneys at Law

501 West Broadway, 15th Floor | San Diego, CA 92101-3541 Telephone: 619.233.1155 | Facsimile: 619.233.1158 www.allenmatkins.com

Lynne L. Heidel E-mail: lheidel@allenmatkins.com Direct Dial: 619.235.1542 File Number: S7133-002/SD659700.02

October 19, 2006

Donna Clark, Environmental Planner City of San Diego Development Services Center 1222 First Avenue, MS 501 San Diego, California 92101

Re: Draft Environmental Impact Report - El Camino Real Road/Bridge Widening Project

Dear Ms. Clark:

We represent San Diego Surf Cup, Inc. ("Surf Cup"), the holder of a contract, dated January 1, 1998, with the San Diego Polo Club ("Polo Club"). According to the terms of the contract, Surf Cup is permitted to use the Polo Fields on El Camino Real for soccer tournaments through December 31, 2013. Surf Cup plays host to two annual soccer tournaments in July/August and November of each year at the Polo Fields, in an effort to promote the highest level of competition available in youth soccer. These tournaments operate pursuant to special events permits issued on a tournament by tournament basis by the City of San Diego ("City").

We thank you for this opportunity to provide comments on the Draft Environmental Impact Report ("DEIR") for the El Camino Real Road/Bridge Widening Project ("project") pursuant to the California Environmental Quality Act ("CEQA"). The project, as proposed, will have an extremely negative impact on the environment and on the future of Surf Cup, as detailed below. The impact on Surf Cup depends to a great extent on the alternative selected by the decision maker. In particular, the alternative preferred by the City of San Diego Transportation and Drainage Division, the Eastern Alternative, will have the most negative impact on Surf Cup, as it will remove seven fields from tournament play. The impact to the property is shown on Exhibit 1, which is attached to this letter for your review. After reviewing the DEIR, it is our belief that the document needs to be revised to address the inadequacies highlighted in this letter.

Donna Clark, Environmental Planner October 19, 2006 Page 2

Surf Cup

According to the San Diego Convention and Visitor's Bureau ("ConVis"), Surf Cup is the largest annual sporting event in San Diego County, akin to a large convention. ConVis presented its Client of the Year Award to Surf Cup in 2005. The San Diego City Council has recognized Surf Cup and its healthy and positive contribution to the community every year with resolutions declaring "Surf Cup Days in San Diego" to coincide with the three weekends of tournament play. The Mayor of San Diego, together with the City Department of Special Events and ConVis, invited Surf Cup's organizers to a press conference in July 2006, at which time Mayor Jerry Sanders publicly recognized the importance of the economic impact of Surf Cup, as well as the recognition Surf Cup brings to the City.

The two Surf Cup tournaments are held at the Polo Fields over three weekends and are among the most prominent tournaments in the United States. They bring approximately 16,000 visitors to San Diego annually and have an economic impact of over \$19.5 million on the San Diego regional economy. Participants in the annual events account for approximately 18,000 hotel roomnights each year. Excess funds generated by the tournaments are put back into the community by way of donations to the San Dieguito Surf Soccer Club ("Surf Soccer Club"), as well as other charitable and non-profit organizations.

The Surf Cup contract with the Polo Club includes providing field space to the Surf Soccer Club for general practices for eleven months of the year and games throughout the fall. This partnership utilizes the funds generated by the tournaments to provide field space for approximately 600 children to practice and play games at no cost to the City. This arrangement relieves the City of the responsibility to provide field space on the City's already overcrowded park land.

Surf Cup participants, who range in age from 9 to 18, come from all over the world. Coaches from some of the most prestigious colleges and universities attend the tournament to scout talent for scholarships. In fact, Surf Cup is considered to be the premier scouting opportunity for youth soccer players striving to continue playing soccer in college.

All Surf Cup games are played at the San Diego Polo Club on 18 full-sized fields. The ability to hold each of the two annual tournaments in a single location is one of the main reasons Surf Cup has grown to such prominence since its move to the Polo Fields in 1992. A single location provides opportunities for corporate sponsorship and college scouting that are not possible at a multi-site event. However, implementation of the project in its proposed form will remove seven fields from play, thereby eliminating the critical mass required for a single site event and bringing an end to the tournament.

Moreover, loss of the Surf Cup tournaments also will negatively impact the Surf Soccer-Club, which benefits financially from the tournaments and is provided field space as a result of this unique partnership. Without Surf Cup financial support and the use of the Polo Fields, the Surf

Donna Clark, Environmental Planner October 19, 2006 Page 3

Soccer Club will be without a facility on which to hold their operations. Over 600 children will lose their place to play soccer.

As a result of the project's potential negative impacts on the environment and on soccer in San Diego, we have reviewed the DEIR on behalf of Surf Cup and provide the following comments thereon.

CEQA Significance Thresholds

As a preliminary issue, the DEIR appears to rely on the City of San Diego Significance Determination Guidelines from November 2004. Such a reliance is contrary to well-settled law. Specifically, according to the Guidelines for the California Environmental Quality Act (14 Cal.Code Regs. §§ 15000, *et seq.*), "[t]hresholds of significance to be adopted for general use as part of the local agency's environmental review process must be adopted by ordinance, resolution, rule or regulation, and developed through a public review process and be supported by substantial evidence." *See*, CEQA Guidelines § 15064.7(b). It is our understanding that the City has never formally adopted the draft significance guidelines that are used in the DEIR. As a result, City staff improperly relied on unsupportable significance thresholds. Such an error leads to inaccurate analysis, which should be rejected.

Environmental Setting

The Environmental Setting discussion of the DEIR is flawed, in that it fails to adequately consider the project's impact on Surf Cup. This error stems from the fact that the document's Environmental Setting fails to identify Surf Cup as an existing land use in the project's vicinity. By not including Surf Cup within the environmental setting, the remainder of the analysis included in the DEIR is incomplete and erroneous.

Project Description

Next, the DEIR's Project Description is inaccurate. With regard to the project's location within the Coastal Zone, the DEIR's project description states that a coastal development permit ("CDP") is needed from the City, which is then appealable to the California Coastal Commission. However, a second CDP is needed for any portion of the mitigation monitoring program that falls within the jurisdiction of the California Coastal Commission. This second CDP process is not addressed in the project description. Failure to properly identify a project in the project description is a significant defect under CEQA. Because the DEIR falls victim to that error, the remainder of the document is therefore, questionable.

Donna Clark, Environmental Planner October 19, 2006 Page 4

Project Segmentation

The DEIR improperly piecemeals one transportation project into three separate projects. Specifically, at the same time the City is working to widen El Camino Real between San Dieguito Road north to Via de la Valle through this DEIR, the City also is working to: (1) widen El Camino Real from San Dieguito Road south to Sea Country Lane, and (2) widen Via de la Valle from San Andreas Drive east to El Camino Real. As shown on Exhibit 3.1-2, both of these proposed projects are immediately adjacent to the road widening proposed in the DEIR. In light of the related aspect of these two other projects, it is arguable that the individual projects are all part of one whole, and should be considered in one EIR. In effect, the City has chosen to segment the widening of roads in the area into multiple projects with different EIRs, in an effort to avoid full environmental analysis. Failure to adequately analyze the full extent of a project in an EIR is specifically prohibited by CEQA. Thus, the City's decision to segment these related projects into three separate environmental reviews is improper and the DEIR should be rejected.

Federal Environmental Review

Another overarching problem with the DEIR is that the document was not processed and released together with the environmental review required by the National Environmental Policy Act ("NEPA"). As noted in the DEIR, the project requires NEPA analysis because of federal funding from the Federal Highway Administration ("FHWA"). However, the environmental assessment ("EA") that allegedly is being prepared was not available for review and comment at the same time as the DEIR. Such a process is in direct conflict with CEQA Guidelines § 15222, which encourages the preparation of joint CEQA/NEPA documents. There is no discussion in the DEIR as to why a joint document was not prepared, or whether the FHWA was consulted on preparation of the DEIR. Moreover, there is no meaningful information provided as to when the EA will be published, or how it will impact the City's review and implementation of the project. Failure to include this information leads to a defective document, which cannot be the basis for ultimate review by the San Diego City Council.

Land Use Impacts

The DEIR's Land Use analysis is defective. As noted, the DEIR does not consider Surf Cup, an existing land use adjacent to the property since 1992. This failure is particularly conspicuous in the Land Use section, wherein Issue 4 addresses the Effects on Existing and Planned Recreational Facilities, and considers the Polo Club. There is no discussion in that subsection, or anywhere else in the Land Use section for that matter, of Surf Cup and/or the project's impacts on the annual soccer tournaments. Moreover, the analysis that is included regarding the Polo Club is abbreviated and does not contain any comments from the Polo Club's spokesperson, but instead relies on the Polo Club's website for information. When compared to Table 3.1-10 and the discussion of the project's impacts on the Del Mar Horsepark, which sits just across El Camino Real from the Polo

Donna Clark, Environmental Planner October 19, 2006 Page 5

Club, the minimal analysis of the Polo Club and the total lack of information on Surf Cup and local soccer become even more apparent and more egregious.

Another flaw apparent in our review of the Land Use section is that, although the DEIR states that the City will work with the Polo Club to reduce impacts on the property, including adjusting the play areas, there is no support for such a statement. In fact, the DEIR fails to discuss whether such adjustment would be possible under any of the alternatives, and more particularly, under the Eastern Alternative, which is estimated to impact 225 feet of Polo Club property. If such adjustment is not possible, and it may not be, then the DEIR should include a discussion of the ultimate impact the project would have on polo in San Diego, including the economic and recreation impacts caused by road widening. Similarly, the DEIR needs to include the same impact discussion relative to Surf Cup and the Surf Soccer Club, including the temporary and permanent impacts a loss of 225 feet would have on recreation and soccer in San Diego.

The DEIR's discussion of Section 4(f) of the U.S. Department of Transportation Act of 1986 also fails to consider the project's impact on Surf Cup. Soccer at the Polo Fields is open to thousands of participants and spectators during the three weekends of the two annual tournaments. Failure to discuss Surf Cup in this context is a significant error. The Surf Soccer Club's use of the Polo Fields on a regular basis is similarly ignored, which again represents a significant flaw in the DEIR.

The DEIR also is in error as it relates to the term of the City's lease with the Polo Club. It is our understanding that the lease does not expire until 2013, contrary to the DEIR's claim that the lease expires on March 31, 2012.

Traffic/Circulation

Because the description of the environmental setting is inaccurate, the DEIR fails to adequately consider the project's impact on parking at the Polo Club and on the Hu property. During polo season, participants park at the west end of the Polo Fields, which parking will be impacted by the project. Similarly, participants in the Surf Cup tournaments park on the adjacent Hu property, pursuant to an agreement with the neighboring property owner. Although the proposed project will negatively impact a substantial portion of the leased space used for parking, this issue is not addressed in the DEIR with regard to weekly polo matches, Surf Cup tournaments or Surf Soccer Club practices and games.

The DEIR identifies significant traffic impacts associated with Central Alignment, Western Alignment and Lower Elevation alternatives, but nonetheless, decides to forgo feasible mitigation measures associated with those alternatives. As explained in the DEIR, the impact on long-term level of service ("LOS") at Via de la Valle eastbound to El Camino Real southbound would be LOS E in the AM and PM peak for these alternatives, which would be a significant impact under the CEQA threshold. The impact could be mitigated by providing a dedicated right turn lane; however,

Donna Clark, Environmental Planner October 19, 2006 Page 6

the mitigation measure is not being selected because the configuration would cause land use impacts at Mary's Tack and Feed. Despite this broad statement, no specific land use impacts are explained or even noted in the DEIR's discussion of long-term LOS.

In fact, a review of the Land Use section, as it relates to Mary's Tack and Feed, indicates that the project's impact on that existing use would be limited to the store's driveway, and would not impact the store. There is no information included in the DEIR to justify the statement that a land use impact on Mary's Tack and Feed prevents the implementation of an otherwise feasible mitigation measure needed to mitigate traffic impacts caused by the Central Alignment, Western Alignment and Lower Elevation alternatives. As a result, the decision not to recommend feasible mitigation measures is inappropriate.

Preferred Alternative

For the same reason identified in the Traffic/Circulation discussion, Surf Cup objects to the City's preferred alternative decision. In contrast to the limited impact the Western Alternative would have on Mary's Tack and Feed, the Eastern Alternative, selected by the City as the preferred project, will severely limit the ability of the Polo Club and Surf Cup to continue using the Polo Fields, and will most likely result in the demise of Surf Cup soccer in San Diego.

Additionally, the benefits associated with the Eastern Alternative's plan to retain the current bridge for non-vehicular use are not as clear cut as indicated throughout the DEIR. Buried within the Biological Resources section is a brief mention that the board of the Joint Powers Authority ("JPA") that manages the adjacent property must act to accept the bridge. If the JPA does not act, then the Visual/Aesthetic mitigation measure relative to bridge fencing would presumably apply to the Eastern Alternative. In particular, the significant impact associated with the fencing will be applicable to the Eastern Alternative since the new bridge would have to accommodate nonvehicular traffic in the same manner as the other alternatives. Such information should be included within the discussion of the preferred alternative, to allow the City Council to consider the full impacts of the project and its alternatives.

In addition, the plans to retain the existing bridge under the Eastern Alternative appear to be either unsafe, illegal or both. The DEIR states that the current bridge must be removed because, in its current position, the 100-year floor level would rise to the bottom of the bridge deck, thereby preventing debris from passing underneath. Significantly, the DEIR notes that the existing bridge is not structurally adequate for the local seismic conditions, because the piles are relatively shallow and buried in sediments that could fail in an earthquake due to liquefaction. Despite these very serious concerns, which are not adequately considered in the text of the DEIR, the City has identified the Eastern Alternative as the preferred alternative. Such a decision seems ill-advised in light of the unanalyzed impacts.

Donna Clark, Environmental Planner October 19, 2006 Page 7

To compound this error, the DEIR does not provide a full description of the preferred alternative, which cuts the project's estimated completion time by only 85 days, or approximately 3 months (705 days for the Western or Central Alternative versus 620 days for the Eastern Alternative). Such a delay is inconsequential when compared to the project's entire timeframe. The difference should be pointed out clearly in the discussion of the preferred alternative, as the benefits of the preferred alternative are not as clear cut as indicated in the DEIR.

Therefore, in light of the DEIR's failure to adequately disclose the project's impacts as they relate to each alternative, Surf Cup does not believe the document can support approval by the City Council of the Eastern Alternative.

Hydrology/Water Quality

The DEIR fails to include adequate mitigation for the project's Hydrology/Water Quality impacts. First, the document improperly delays identification of mitigation measures to a future date. The DEIR states that mitigation measures will be developed during negotiations with the permitting agencies, which agencies are not defined in the mitigation measures, after completion of the DEIR. Such a postponement is contrary to well-settled law and violates CEQA. Second, the mitigation measures that are included are not supported by the DEIR. Specifically, Mitigation Measure 7-1 states that buried bank stabilization would mitigate for increased 100-year velocities. However, this conclusion is not adequately considered or analyzed in the document, and therefore, should not be considered therein.

Geology/Seismicity/Soils

The DEIR identifies significant geologic impacts caused by the project, but states that "typically, standard construction practices recommended in a geologic report would not be mitigation." Toward that end, none of the recommended construction practices are included within the text of the DEIR or identified as specific mitigation measures. Failure to include the recommended procedures as mitigation measures leaves project implementation susceptible to attack, in that none of the measures are included within the enforceable Mitigation Monitoring and Reporting Program ("MMRP") pursuant to CEQA. Such an oversight is in error.

Air Quality

The DEIR fails to include any discussion of the project's air quality health effects, as required by law. Moreover, the air quality section of the EIR identifies a number of fugitive dust emission standards that would be incorporated into project plans. However, as with the geology section discussed above, failure to include these standards as mitigation measures leaves the project vulnerable. The DEIR's consistent disregard for the MMRP leads to the inevitable conclusion that the document is flawed and subsequent efforts to implement the project will significantly impact the environment, without proper recourse to the enforceable MMRP.

Donna Clark, Environmental Planner October 19, 2006 Page 8

Noise

Similar to the issues raised with regard to geology and air quality, the DEIR identifies noise impacts that would result from construction of the project, pursuant to the "Consistency with the Environmental Assessment" discussion. Although identified as a potential necessity, there is no mitigation measure that controls the construction of a wall on the Prime 10 Steak House. In fact, the document fails to make permit conditions that would be required for wall construction into mitigation measures. This lack of enforceability at the time of project implementation subjects the EIR to challenge.

Biological Resources

The final impact area discussed in the DEIR is Biological Resources, which also happens to be the most extensive discussion therein. However, the document fails to adequately consider the project's impacts, and as a result, should not be relied upon by the decisionmakers. The primary Biological Resources defect lies with its mitigation measures.

Specifically, the DEIR does not identify the possibility that the project could result in a take of an endangered species. Although the document states that between 31 and 36 pairs of Light-Footed Clapper Rail and two Least-Bell's Vireo territories were detected in the project vicinity, the DEIR states that direct impacts to wildlife species are *not* anticipated. Such a conclusory statement is not supported by the document. Similarly, the DEIR indicates that the Coastal California Gnatcatcher is not expected to occur onsite, despite the fact that no gnatcatcher specific surveys were conducted for the project. These inconsistencies with regard to listed endangered species cannot support project approval.

In addition, the failure to specify impacts to identified species is compounded by the DEIR's mitigation measures, which seek to mitigate project impacts by creation or restoration of habitat. Such efforts cannot mitigate for the potential loss of endangered species, resulting in significant and unmitigatable biological impacts.

Furthermore, other mitigation measures recommended by the DEIR are flawed. In particular, Mitigation Measure 12-6 fails to identify what agency permits must be obtained prior to the bid opening / bid award; and Mitigation Measure 12-7 states that construction noise would be limited to 60 decibels during clapper rail and least Bell's vireo breeding season, but fails to clarify how such a measure will be implemented, *i.e.*, who will conduct the necessary noise monitoring.

Notice and Consultation

Lastly, copies of the DEIR were not distributed to Surf Cup for its review, despite the City's awareness of the tournament and its importance to the City. As explained above, the San Diego. City Council passes resolutions celebrating the tournaments each year, and in July 2006, Mayor Sanders invited the Surf Cup organizers to participate in a news conference before the start of the

Donna Clark, Environmental Planner October 19, 2006 Page 9

tournament. Nevertheless, Surf Cup was left off the distribution list and was not consulted by the preparers of the DEIR. Such an oversight is just one of many errors noted in the DEIR with regard to Surf Cup. Therefore, we request that the Surf Cup be added to any distribution and notice lists for the project and be consulted on any revisions to the DEIR.

Conclusion

In sum, we believe that the DEIR is fatally flawed in its current form. The proposed project will result in significant and unmitigatable impacts on the environment, some of which were not addressed in the document. Moreover, the preferred alternative was selected by the City in an improper fashion. The EIR weighs too heavily in favor of the existing uses to the west of El Camino Real, to the substantial detriment of the Polo Club and Surf Cup, such that the ultimate analysis is flawed. Because the DEIR is defective, we do not believe this document can constitute substantial evidence to support City Council approval of the project.

If you have any questions or if we can be of service during the continuing project review process, please do not hesitate to contact us.

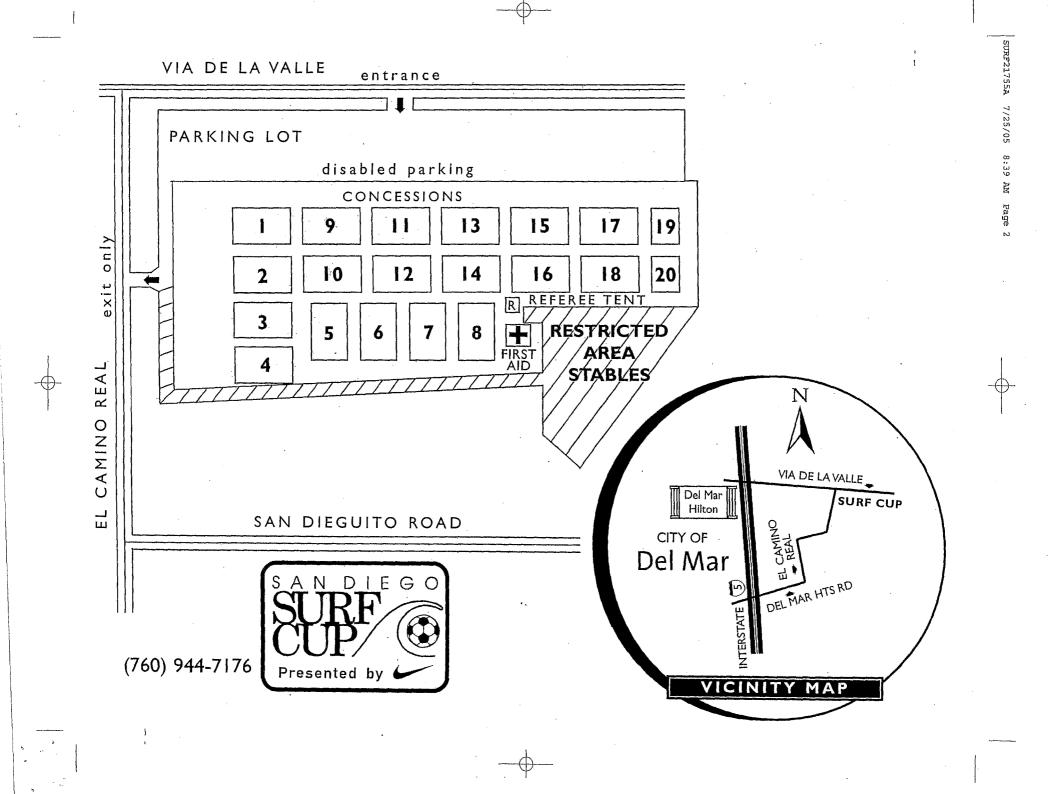
Very truly yours lidel

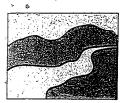
Lynne L. Heidel

Heather S. Riley

LLH:hsr

Council President Scott Peters cc: Mr. R. Michael Connerley Mr. Michael Dawson Mr. Paul E. Robinson, Esq.





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Dick Bobertz Executive Director San Dieguito River Valley Regional Open Space Park 18372 Sycamore Creek Road Escondido, CA 92025 (858) 674-2270 Fax (858) 674-2280 www.sdrp.org

October 20, 2006

Donna Clark City of San Diego Development Services Center 1222 First Avenue, MS 501 San Diego, CA 92101

Subject: El Camino Real Road/Bridge Widening Project #2982 Comments on Draft EIR

Dear Ms. Clark:

We appreciate the opportunity to comment on the El Camino Real Road/Bridge Draft EIR. The JPA Board of Directors considered the DEIR at our October 20, 2006 meeting and while we recognize the need to improve the El Camino Real Bridge for seismic and flood protection, proposed changes to the semi-rural and open vista character of the San Dieguito river valley are a major concern. We feel that the DEIR is inadequate and request that a revised DEIR be circulated for public review reconsidering all the project alternatives per our comments listed below and including new alternatives as described in comment #3. The San Dieguito western river valley is a public treasure that forms the gateway to the 55-mile long regional open space park. We believe that the City's focus on a road and bridge widening project that would only marginally improve traffic flow largely ignores the broader goals of preserving the San Dieguito River Valley.

In addition, widening El Camino Real from Via de la Valle to San Dieguito Road (along with widening a section of Via de la Valle) is not justified at this time. Council President and District 1 Councilman Scott Peters initiated an ad hoc western river valley task force in September 2006 that has already held several meetings to evaluate the land use issues in this area, prompted by the recent proposals to widen El Camino Real and Via de la Valle. The task force should be allowed to complete its work prior to any decisions made on this project. Task force recommendations are expected by January 2007.

Specifically, we have the following comments on the DEIR:

1. As justification for the project, the Draft EIR compares "existing condition" traffic counts taken in July 2003 to the 2030 levels. The EIR should clarify the land use assumptions used in 2003. Since July

Ms. Clark Page 2

> 2003 much new development has occurred both in the immediate Carmel Valley and Pacific Highlands Ranch vicinity as well as in the large developments to the east and south---Torrey Highlands; Del Mar Mesa; Camino Del Sur, etc. All of these developments would feed traffic into the project area, so, presumably, the traffic counts would be much higher today than in 2003. The proposed increase over today's traffic may be significantly less than the 2500-ADT increase depicted. The Final EIR should thoroughly analyze the difference between traffic volumes counted in 2003 and 2006.

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a. <u>Modified Current Road/Bridge</u>: Modify the existing bridge to meet seismic and 100-year flood standards. This can be done by seismic retrofit as has been done for other bridges throughout the county (increasing the depth of the existing piers) and by increasing the abutment slopes from 2:1 to 1.5:1 to provide additional flow capacity. This alternative would also include cantilevers on both sides of the existing bridge to accommodate bikes and pedestrians (east side) and pedestrian/equestrians (west side). We believe there is sufficient room under the existing bridge to accommodate a raised platform trail for the Coast to Crest Trail. Also included would be improvements at each intersection, such as

Ms. Clark Page 3

> roundabouts and extending the right-turn only lane on northbound El Camino Real to eastbound Via de la Valle, to improved flow.

- b. Modified Central Alignment: Replace the old bridge and roadway with new as proposed for the Central Alignment (i.e., project would be above the 100-year flood as proposed) with the following modifications: road and bridge would consist of 2 12-foot wide traffic lanes instead of 4, with 8-foot bike lanes on both sides, and a 6- to 10-foot wide landscaped median, a 13-foot wide pedestrian/equestrian lane on the west side (equestrian portion would only exist on bridge itself and would end at connection to Coast to Crest Trail, with pedestrian walkway continuing on the road), and a 5-foot wide pedestrian walkway on the east side. This alternative would also include modifications at the intersections (such as roundabouts) to improve flow. A ramp would also be provided on the west side/north end of the bridge to access the Coast to Crest Trail undercrossing. With this configuration, the total width of the bridge would be 64 to 68 feet wide (depending on the width of the median).
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Ms. Clark Page 4

> 7. Fencing for a cantilever can be designed using vertical pickets rather than chain link so as not to further block views to the west. Visual impacts should be the same for all alternatives including the preferred, and significance should not be based on a chain link cautilever railing. The JPA's recommendation for the cantilever railing is a 2-foot high solid toe plate with 6 foot high railing on top for a total height of 8 feet to provide safe use for horses. The fence can be made of vertical metal pickets spaced at 4 inches apart up to 42 inches high (required by building code), but increased spacing above 42 inches to increase views through the fence. This design has been used successfully at the JPA-designed cantilever along Bandy Canyon Road in the San Pasqual Valley.

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- 13. The hydrologic conditions that exist in the project area are critical to the survival of the significant clapper rail population. A detailed study of the hydrologic conditions along this segment of river should be conducted to understand the conditions that allow this endangered species to thrive in this location, and to accurately evaluate impacts to the population from this project. The clapper rails prefer slow-moving and ponding water with stands of emergent marsh vegetation to hide, feed and nest. The Draft EIR must evaluate whether the project would change these conditions. Increasing the cfs or other hydrologic changes could change conditions enough to impact the population. The hydrology should be maintained and also duplicated on the mitigation site to provide conditions favorable to the species. This entire issue is completely missing from the Draft EIR, and is the key to determining the significance of the project's impact on the survival of the clapper rail population.
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> the impacts occurring for the project to provide substitute habitat opportunities for the rails during the construction disturbance of the river corridor.

- 15. The Clapper Rail population was found primarily under and to the east of the existing bridge. Therefore, the alignment of the preferred alternative to the east would impact more rail pairs than any of the other alternatives and would potential fragment the habitat by cutting off the area west of the new bridge from the habitat to the east. The habitat between the existing and new bridge should also be counted as impacted. The Eastern Alignment appears to have greater permanent impacts to the endangered species than the other alternatives – despite the shorter construction schedule.
- 16. The DEIR partially justifies the preference of the Eastern Alignment based on the fact that it would result in fewer impacts to the clapper rails during construction because it reduces the construction period to two seasons instead of three. However, the DEIR does not discuss whether retaining the old bridge would benefit the species at all. Are there any benefits to the species from removing the bridge? The Eastern Alignment would cause more permanent impacts to the habitat because two bridges would result in less overall habitat and potentially affect the hydrologic conditions favorable to the species (see comments above). Therefore, it doesn't seem that the reduced number of construction seasons outweighs the greater permanent impacts.
- 17. Considering the significance of this population of clapper rails, the project site and mitigation site should both be incorporated into a long-term ongoing monitoring effort. The proposed 5-year monitoring and maintenance period at the mitigation site is inadequate and does not guarantee its success, which should be a long-term preserve to replace lost habitat from the project. The project should implement or at least contribute a fair share contribution to add both areas to long-term monitoring sites. Long-term management should also be required to maintain the existing population (and hopefully a future population at the mitigation site) as is done for other large populations in the state. The need for long-term management to maintain and hopefully recover this species is well documented in the Management and Population Assessment (Zembal et al, 1997) and annual status and distribution reports (Zembal et al).

- 18. The Draft EIR does not evaluate whether adding a new bridge while retaining the old bridge would impact the wildlife corridor by adding further obstructions to wildlife movement (compared to replacing old bridge with new bridge). The Draft EIR (pages 3.12-47 and 3.12-49, #4) states that the new bridge would "improve" the function of the wildlife corridor because it would be higher and consist of fewer piles. However, it does not explain how the preferred alternative would "improve" the function since the existing bridge would remain. Would adding new piers while leaving the old piers in place create a cumulative impact to wildlife movement?
- 19. The Natural Environment Study Report, page 41, mentions the wildlife corridor culvert required by the MHPA guideline and states that because the project is north of the existing culvert at Gonzales Canyon, the project will not include such a culvert. While it is true that the proposed project is north of the existing culvert, the MHPA guideline does not state how such a culvert would be built. Since the proposed project is within the MHPA and would significantly impact wildlife and habitat within the wildlife corridor, appropriate mitigation should include a fair share contribution to implementing the MHPA guideline for constructing a wildlife corridor culvert.
- 20. Views of the river valley to the west from the City-owned Polo Club property would be blocked by the new bridge. The property is part of the Fairbanks Ranch Country Club Specific Plan and was deed restricted as open space in 1983 as part of the mitigation for development of Fairbanks Ranch, and was dedicated as open space to the City - views are public. The statement on page 3.1-16 that views to the west are "not public views" is incorrect and should be reevaluated. The impact from raising the bridge and road by 5 to 10 feet within a sensitive river valley, most of which is a public open space preserve, is significant and mitigation must be provided or the project redesigned to reduce impacts to less than significant.
- 21. The Draft EIR should address the issue of potentially removing Cityowned open space land for new right-of-way needed for the Eastern Alignment. Would there be a net loss of open space? This is not evaluated in the EIR. Any loss of open space should be mitigated, possibly by transferring unused road right-of-way to public open space.

- 22. The paragraph on page 3.1-57 regarding Polo Club lease area should also state that the Coast to Crest Trail (public trail) alignment must also be retained or replaced if impacted.
- 23. Cumulative Effects Section 4.3 mis-characterizes the project area by stating that the projects list (Table 4-1) reflects a "trend toward creating views of urban development" (Section 4.3.2.2). In fact, over 600 acres of previously development-zoned land within the City of San Diego (from I-5 to El Camino Real) has been converted to open space through public acquisition over the last ten years to preserve the western river valley, reflecting the trend to actively preserve the wetlands and river corridor. Even in 1983 with the approval of the Fairbanks Ranch Specific Plan, the City acknowledged the "unique opportunity" to preserve several hundred acres of land as open space (this land was subsequently leased to the Fairbanks Ranch golf course and polo fields). The San Dieguito River Park Concept Plan and JPA's Park Master Plan for this area documents this trend. The "urban" projects listed in Table 4-1 only represent smaller projects proposed or approved most recently (most outside of the valley itself) and does not accurately represent the trend of preserving the river valley. Land use and visual impacts to the preserve from widening and raising El Camino Real would be significant
- 24. The Draft EIR should include a visual simulation of JPA mitigation site with clearer view of the proposed berms.
- 25. Section 3.4.3.2 (page 3.4-4) does not address the significance of the dirt road along the edge of the proposed triangular staging area (according to Figure 3.1-1 the dirt road appears to be within the right-of-way for El Camino Real and connects to Old El Camino Real). This road may be a remnant of Portola's 1769 expedition but the Draft EIR does not address this particular segment. The concern is that this section may be the only remaining piece of this historic event that still retains some integrity.
- 26. The EIR states that for all but the Eastern Alignment Alternative, currently buried utilities would have to "be relocated vertically because the proposed road elevation would change." [2-26-17]. Not only should all buried lines remain buried; all utilities in this corridor should be placed on the City's priority list to bury utilities.

We hope that these comments will be fully discussed and analyzed in a revised Draft EIR for public consideration before any actions are taken on a Final EIR. Please feel free to call Shawna Anderson of our staff should you wish to discuss our comments further. We look forward to continued dialogue with the City on this important project.

Sincerely,

for Ed Gallo

JPA Board Vice Chair

Cc: Jim Waring

From:"Shawna Anderson" <shawna@sdrp.org>To:"Donna Clark" <DEClark@sandiego.gov>Date:10/23/2006 12:35:11 PMSubject:Follow up on El Camino Real EIR letter

Hi Donna,

I wanted to confirm that you received our JPA comment letter on the ECR Draft EIR. We faxed it on Friday, and the original is in the mail to you.

I also wanted to add a comment that was not made clear in our letter: The JPA would be opposed to any new bridge design that does not accommodate a Coast to Crest Trail undercrossing along the north side of the river.

Thank you!

Shawna

Shawna C. Anderson, AICP Environmental Planner San Dieguito River Park JPA 18372 Sycamore Creek Road Escondido, CA 92025 (858)674-2275, ext. 13 (858)674-2280 FAX www.sdrp.org

CC:

<susan@sdrp.org>, <dbobertz@sdrp.org>, "Richard Leja" <rleja@sandiego.gov>

TO: JPA Board

FROM: Staff

SUBJECT: El Camino Real Bridge/Road Widening Project Draft EIR

RECOMMENDATION:

Direct staff to send attached comment letter in response to the El Camino Real Bridge/Road Widening Project Draft EIR.

SITUATION:

The City of San Diego is proposing to replace the existing El Camino Real Bridge with a new bridge (Attachments 1 and 2) and widen El Camino Real from Via de la Valle to San Dieguito Road. A Draft Environmental Impact Report (EIR) is now available for public review with comments due to the City by October 21, 2006. A draft comment letter is attached for your Board's consideration (Attachment 3).

ISSUES:

The proposed project is within the San Dieguito River Park's Focused Planning Area and represents a substantive change to the existing environment within an important open space viewshed at the eastern end of the lagoon system. The project is adjacent to the Southern California Edison wetland restoration project, crosses the San Dieguito River, and within the path of the future Coast to Crest Trail. In addition, this segment of river provides habitat for a significant population of the federally endangered light-footed clapper rail (over 35 pairs detected in 2006).

The project EIR evaluates six alternatives, but identifies one, the Eastern Alignment Alternative as the preferred project. The project entails widening the segment of El Camino Real between Via de la Valle and San Dieguito Road including replacing the existing bridge over the San Dieguito River in order to improve the structural integrity of the bridge, to raise the bridge above the 100-year flood level, to improve traffic capacity and flow, and to improve pedestrian and vehicular access. The existing segment of El Camino Real is 2 lanes, 2,400 feet long, 23 feet wide, with no shoulders, bike lanes, or pedestrian walkways. The project would widen the roadway between San Dieguito Road and Via de la Valle to four lanes and add bike lanes, a 22-foot wide landscaped parkway/pedestrian walkway, and a 14-foot wide raised concrete median for a total width of 122 feet. A section of Via de la Valle east of El Camino Real would also be widened to four lanes. The bridge itself would be 94 feet wide with 2 sets of triple piers in the river (6 piers total) (Attachment 4, specifically pages 2-1 through 2-7, 2-12 through 2-16, and Figures 2-1, 2-9, and 2-19).

All the alternatives evaluated in the EIR, with the exception of the Eastern Alignment Alternative, would include removing the old bridge and adding an 8-foot wide cantilever trail along the west side of the new bridge to accommodate a connection to the future Coast to Crest Trail from the south.

The Eastern Alignment Alternative would not have a cantilever, but instead the existing bridge would be retained and the City would vacate it to the JPA for non-vehicular trail use (Attachment 5). The existing bridge would be restriped for pedestrian, bicyclist, and equestrian use. All of the new bridge alternatives, with the exception of the Lower Elevation Alternative, would include a 12-foot wide trail undercrossing under the north end to accommodate the Coast to Crest Trail. The trail undercrossing would connect to the existing trail on the City-owned Polo Club lease property east of the new bridge and to the planned trail along the north side of the river west of the bridge. The new bridge design would be 5 to 12 feet higher than the original bridge to accommodate flood flows and the trail undercrossing.

The comprehensive Draft EIR cites several significant impacts associated with the project, and includes mitigation for those impacts. A key mitigation is the creation and restoration of wetlands associated with impacts from the bridge crossing. The proposed mitigation consists of creating and restoring 15 acres of wetlands (primarily salt and brackish marsh and riparian) on the JPA-owned property (former Boudreau property) just west of El Camino Real. JPA staff have been working with City staff on terms for this mitigation proposal, which meets the JPA's objectives of the original Boudreau property purchase to eventually restore the land to natural habitat (with a direct connection to the SCE restoration project). Other mitigation consists of incorporating landscaping and wood-appearing railing on the new bridge to reduce visual impacts.

Because of the community concern over several recent road widening projects in the western river valley including the widening of El Camino Real and Via de la Valle, Councilman Scott Peters initiated an ad hoc task force in September 2006 to evaluate the land use issues in this area. Your Board as well as the Carmel Valley Planning Board has expressed concerns over the lack of coordinated planning in the western river valley and the threat of several proposed projects to the visual quality and rural character of the open space preserve. The task force includes several members of the CAC, JPA staff, and members of the community. Task force recommendations are expected by January 2007.

CAC RECOMMENDATION:

The CAC considered the Draft EIR at their September 8th and October 6th, 2006 meetings and voted in favor of recommending the Board send a comment letter asking the City to recirculate a new Draft EIR addressing the issues reflected in Attachment 3 (y-19, n-3).

RECOMMENDATION:

Direct staff to send attached comment letter in response to the El Camino Real Bridge/Road Widening Project Draft EIR.

ALTERNATIVES

- 1. Direct staff to send attached DEIR comment letter.
- 2. Provide direction on additional issues/items to include in a letter.

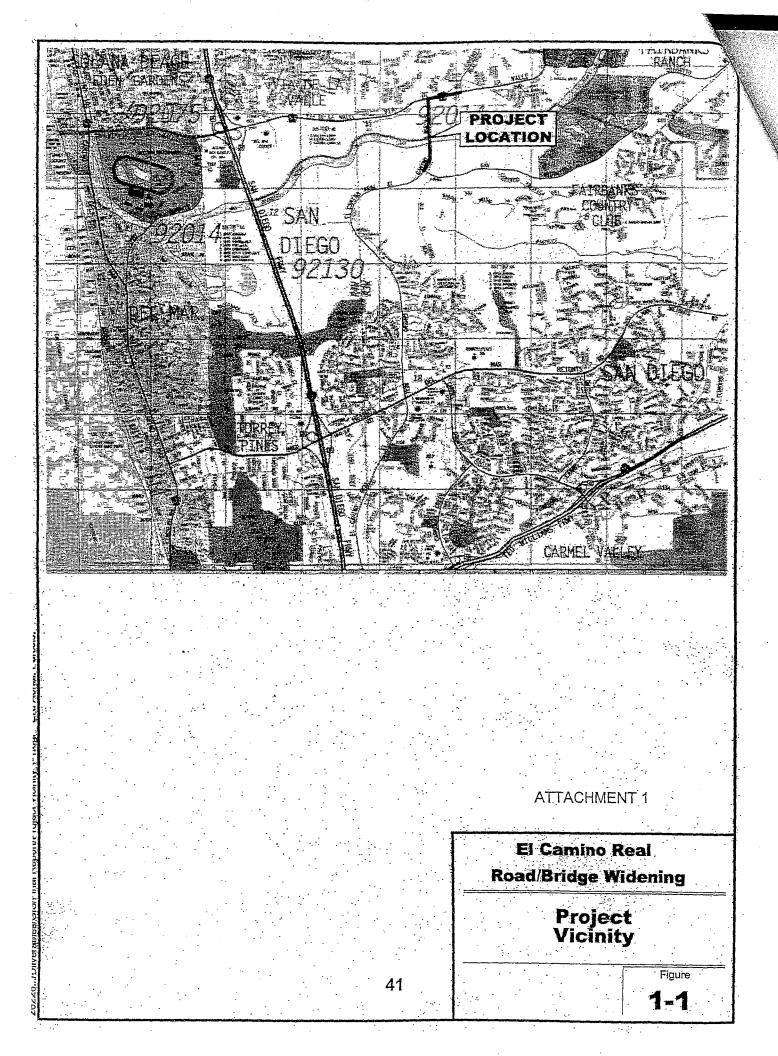
3. Give staff other direction.

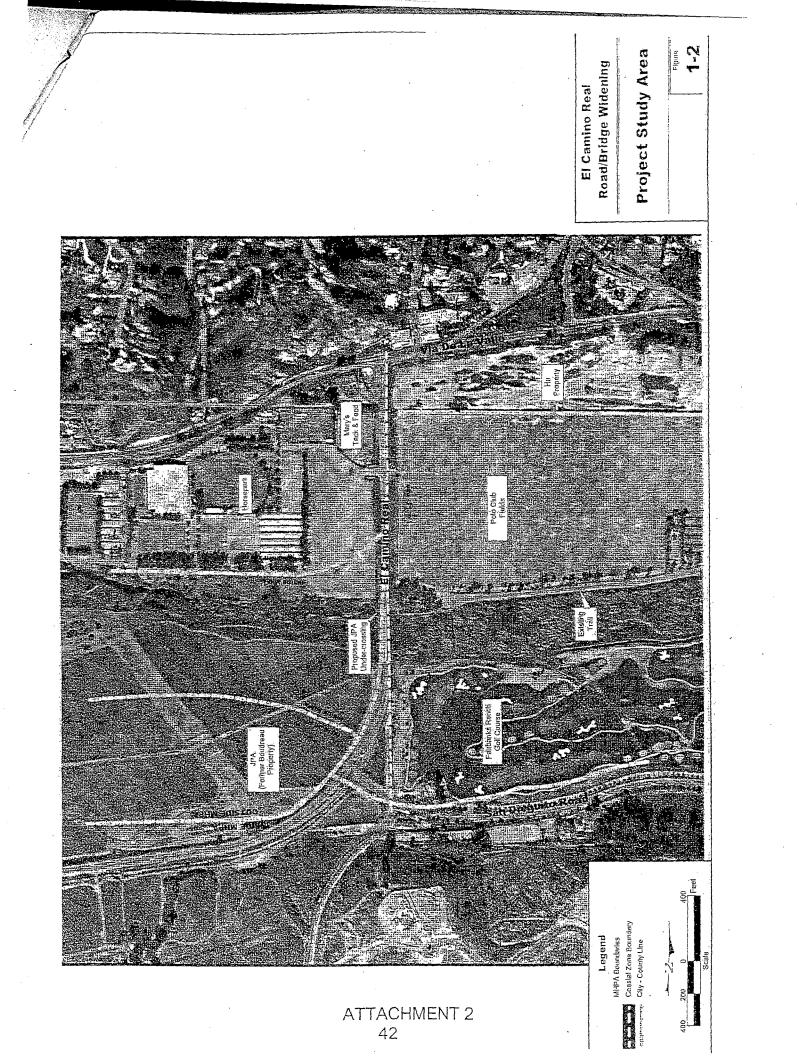
Respectfully submitted,

Shawna Anderson Principal Environmental Planner

Attachments:

- 1. Project Vicinity
- 2. Project Study Area
- 3. Draft DEIR comment letter
- 4. EIR Project Description (in September 15, 2006 agenda)
- 5. Visual Simulation





October 20, 2006

Donna Clark City of San Diego Development Services Center 1222 First Avenue, MS 501 San Diego, CA 92101

Subject: El Camino Real Road/Bridge Widening Project #2982 Comments on Draft EIR

Dear Ms. Clark:

We appreciate the opportunity to comment on the El Camino Real Road/Bridge Draft EIR. The JPA Board of Directors considered the DEIR at our October 20, 2006 meeting and while we recognize the need to improve the El Camino Real Bridge for seismic and flood protection, proposed changes to the semi-rural and open vista character of the San Dieguito river valley are a major concern. We feel that the DEIR is inadequate and request that a revised DEIR be circulated for public review reconsidering all the project alternatives per our comments listed below and including new alternatives as described in comment #3. The San Dieguito western river valley is a public treasure that forms the gateway to the 55-mile long regional open space park. We believe that the City's focus on a road and bridge widening project that would only marginally improve traffic flow largely ignores the broader goals of preserving the San Dieguito River Valley.

In addition, widening El Camino Real from Via de la Valle to San Dieguito Road (along with widening a section of Via de la Valle) is not justified at this time. Council President and District 1 Councilman Scott Peters initiated an ad hoc western river valley task force in September 2006 that has already held several meetings to evaluate the land use issues in this area, prompted by the recent proposals to widen El Camino Real and Via de la Valle. The task force should be allowed to complete its work prior to any decisions made on this project. Task force recommendations are expected by January 2007.

Specifically, we have the following comments on the DEIR:

As justification for the project, the Draft EIR compares "existing condition" traffic counts taken in July 2003 to the 2030 levels. The EIR should clarify the land use assumptions used in 2003. Since July 2003 much new development has occurred both in the immediate Carmel Valley and Pacific Highlands Ranch vicinity as well as in the large developments to the east and south---Torrey Highlands; Del Mar Mesa; Camino Del Sur, etc. All of these developments would feed traffic into the project area, so, presumably, the traffic counts would be much higher today than in 2003. The proposed increase over today's traffic may be significantly less than the 2,500 ADT increase depicted. The Final EIR should thoroughly analyze the difference between traffic volumes counted in 2003 and 2006.

WHAT IS

- 2. LOS definitions include speed limits as shown in Table 3.2-1. Justification for widening the roadway to four lanes should not include LOS levels that assume achievement of high speed limits along this stretch of scenic roadway. LOS levels may not approach E or F if it is determined that a speed limit of 35 MPH along the roadway is reasonable.
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 - a. <u>Modified Current Road/Bridge</u>: Modify the existing bridge to meet seismic and 100-year flood standards. This can be done by seismic retrofit as has been done for other bridges throughout the county (increasing the depth of the existing piers) and by increasing the abutment slopes from 2:1 to 1.5:1 to provide <u>additional flow</u>, capacity. This alternative would also include cantilevers on both sides of the existing bridge to accommodate bikes and pedestrians (east side) and pedestrian/equestrians (west side). We believe there is sufficient room under the existing bridge to accommodate a raised platform trail for the Coast to Crest Trail. Also included would be improvements at each intersection, such as roundabouts and extending the right-turn only lane on northbound El Camino Real to eastbound Via de la Valle, to improved flow.
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October 20, 2006

not discuss whether retaining the old bridge would benefit the species at all. Are there any benefits to the species from removing the bridge? The Eastern Alignment would cause more permanent impacts to the habitat because two bridges would result in less overall habitat and potentially affect the hydrologic conditions favorable to the species (see comments above). Therefore, it doesn't seem that the reduced number of construction seasons outweights the greater permanent impacts.

- 17/Considering the significance of this population of clapper rails, the project site and mitigation site should both be incorporated into a long-term ongoing monitoring effort. The proposed 5-year monitoring and maintenance period at the mitigation site is inadequate and does not guarantee its success, which should be a long-term preserve to replace lost habitat from the project. The project should implement or at least contribute a fair share contribution to add both areas to long-term monitoring sites. Long-term management should also be required to maintain the existing population (and hopefully a future population at the mitigation site) as is done for other large populations in the state. The need for long-term management to maintain and hopefully recover this species is well documented in the Management and Population Assessment (Zembal et al, 1997) and annual status and distribution reports (Zembal et al).
- 18. The Draft EIR does not evaluate whether adding a new bridge while retaining the old bridge would impact the wildlife corridor by adding further obstructions to wildlife movement (compared to replacing old bridge with new bridge). The Draft EIR (pages 3.12-47 and 3.12-49, #4) states that the new bridge would "improve" the function of the wildlife corridor because it would be higher and consist of fewer piles. However, it does not explain how the preferred alternative would "improve" the function since the existing bridge would remain. Would adding new piers while leaving the old piers in place create a cumulative impact to wildlife movement?
- 19. The Natural Environment Study Report, page 41, mentions the wildlife corridor culvert required by the MHPA guideline and states that because the project is north of the existing culvert at Gonzales Canyon, the project will not include such a culvert. While it is true that the proposed project is north of the existing culvert, the MHPA guideline does not state how such a culvert would be built. Since the proposed project is within the MHPA and would significantly impact wildlife and habitat within the wildlife corridor, appropriate mitigation should include a fair share contribution to implementing the MHPA guideline for constructing a wildlife corridor culvert.
- 20. Views of the river valley to the west from the City-owned Polo Club property would be blocked by the new bridge. The property is part of the Fairbanks Ranch Country Club Specific Plan and was deed restricted as open space in 1983 as part of the mitigation for development of Fairbanks Ranch, and was dedicated as open space to the City - views are public. The statement on page 3.1-16 that views to the west are "not public views" is incorrect and should be reevaluated. The impact from raising the bridge and road by 5 to 10 feet within a sensitive river valley, most of which is a public open space preserve, is significant and mitigation must be provided or the project redesigned to reduce impacts to less than significant.

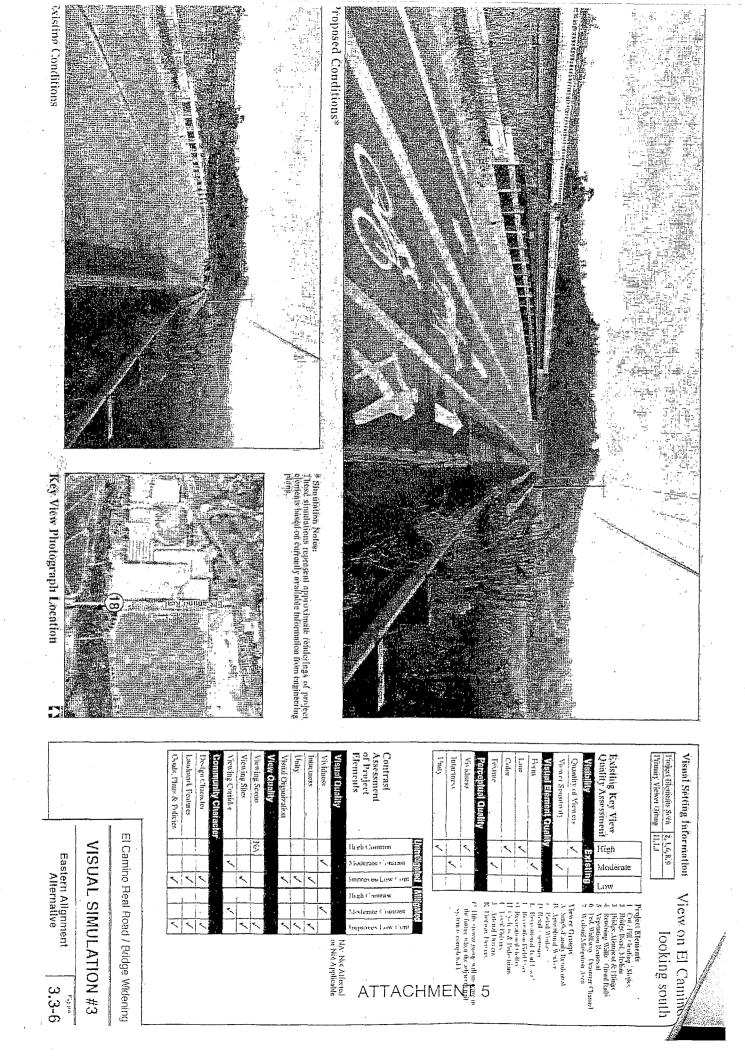
- 21. The Draft EIR should address the issue of potentially removing City-owned open space land for new right-of-way needed for the Eastern Alignment. Would there be a net loss of open space? This is not evaluated in the EIR. Any loss of open space should be mitigated, possibly by transferring unused road right-of-way to public open space.
- 22. The paragraph on page 3.1-57 regarding Polo Club lease area should also state that the Coast to Crest Trail (public trail) alignment must also be retained or replaced if impacted.
- 23. Cumulative Effects Section 4.3 mis-characterizes the project area by stating that the projects list (Table 4-1) reflects a "trend toward creating views of urban development" (Section 4.3.2.2). In fact, over 600 acres of previously development-zoned land within the City of San Diego (from I-5 to El Camino Real) has been converted to open space through public acquisition over the last ten years to preserve the western river valley, reflecting the trend to actively preserve the wetlands and river corridor. Even in 1983 with the approval of the Fairbanks Ranch Specific Plan, the City acknowledged the "unique opportunity" to preserve several hundred acres of land as open space (this land was subsequently leased to the Fairbanks Ranch golf course and polo fields). The San Dieguito River Park Concept Plan and JPA's Park Master Plan for this area documents this trend. The "urban" projects listed in Table 4-1 only represent smaller projects proposed or approved most recently (most outside of the valley itself) and does not accurately represent the trend of preserving the river valley. Land use and visual impacts to the preserve from widening and raising El Camino Real would be significant
- 24. The Draft EIR should include a visual simulation of JPA mitigation site with clearer view of the proposed berms.
- 25. Section 3.4.3.2 (page 3.4-4) does not address the significance of the dirt road along the edge of the proposed triangular staging area (according to Figure 3.1-1 the dirt road appears to be within the right-of-way for El Camino Real and connects to Old El Camino Real). This road may be a remnant of Portola's 1769 expedition but the Draft EIR does not address this particular segment. The concern is that this section may be the only remaining piece of this historic event that still retains some integrity.
- 26. The EIR states that for all but the Eastern Alignment Alternative, currently buried utilities would have to "be relocated vertically because the proposed road elevation would change." [2-26-17]. Not only should all buried lines remain buried; all utilities in this corridor should be placed on the City's priority list to bury utilities.

We hope that these comments will be fully discussed and analyzed in a revised Draft EIR for public consideration before any actions are taken on a Final EIR. Please feel free to call Shawna Anderson of our staff should you wish to discuss our comments further. We look forward to continued dialogue with the City on this important project.

Sincerely,

Ed Gallo JPA Board Vice-Chair

cc: Jim Waring



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STATE OF CALIFORNIA-THE RESOURCES AGENCY

ARNOLD SCHWARZENEGGER, Governor

DEPARTMENT OF FISH AND GAME



FACSIMILE TRANSMITTAL

TO: Donna Clark, Environmental Planner City of San Diego Development Services Center Telephone (619) 446-5387 Fax (619) 446-5499

> State Clearinghouse Fax (916) 323-3018

FROM: Libby Lucas South Coast Region 4949 Viewridge Avenue San Diego, California 92123 Telephone (858) 467-4230 Fax (858) 627-3984

DATE: 10/23/06

TIME:

OF PAGES SENT INCLUDING TRANSMITTAL SHEET 20

COMMENTS:

This is the joint comment letter from the Department of Fish and Game and the U.S. Fish and Wildlife Service on the Draft Environmental Impact Report for the El Camino Real Road Widening/ Bridge Replacement Project (SCH# 1999071104). We will also send the City the letter by regular mail, and copies to the cc's by regular mail.

IF YOU DO NOT RECEIVE ALL OF THE PAGES INDICATED PLEASE CALL THE SENDER AS SOON AS POSSIBLE.



In Reply Refer to: FWS-SDG-3236.4 US Fish and Wildlife Service Carlsbad Fish and Wildlife Office 6010 Hidden Valley Road Carlsbad, California 92011 (760) 431-9440 FAX (760) 431-5902



California Department of Fish & Game South Coast Regional Office 4949 Viewridge Avenue San Diego, California 92123 (858) 467-4201 FAX (858) 467-4299

October 23, 2006

Donna Clark, Environmental Planner City of San Diego Development Services Center 1222 First Avenue, MS 501 San Diego, California 92101

Re: Comments on the Draft Environmental Impact Report for the El Camino Real Road Widening/Bridge Replacement Project (SCH# 1999071104)

Dear Ms. Clark:

The California Department of Fish and Game (Department) and U. S. Fish and Wildlife Service (Service) (collectively, "Wildlife Agencies") have reviewed the above-referenced draft environmental impact report (DEIR) for the El Camino Real Road Widening/Bridge Replacement Project, which we received on July 26, 2006. The public review period for this DEIR ends on October 21, 2006, a Saturday. However, on October 18, 2006, you kindly granted the Wildlife Agencies an extension until 5:00 PM on Monday, October 23. We appreciate the extension.

The primary concern and mandate of the Service is the protection of public fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Endangered Species Act of 1973, as amended (Act) (16 U.S.C. 1531 *et seq.*). The Department is a Trustee Agency and a Responsible Agency pursuant to the California Environmental Quality Act (CEQA) and is responsible for ensuring appropriate conservation of fish and wildlife resources including rare, threatened, and endangered plant and animal species, pursuant to the California Endangered Species Act (CESA), and other sections of the California Fish and Game Code. The Department also administers the Natural Community Conservation Planning program.

The proposed project would modify the 0.5 mile segment of El Camino Real between Via de la Valle and San Dieguito Road and replace the bridge over the San Dieguito River in order to improve the structural integrity of the bridge, alleviate problems associated with high flood events, improve pedestrian and vehicular access to nearby coastal and recreational resources, relieve traffic congestion, and improve consistency with the adopted land use plan in the project area. Approximately 1,000 feet of Via de la Valle would also be widened to accommodate the new configuration of El Camino Real. The western portion of the project site is within the Subarea II of the Future Urbanizing Area, and the eastern portion is in the Fairbanks Ranch Country Club Community Planning Area. Portions of the project are within the Multiple Habitat Preservation Area (MHPA) of the City of San Diego's (City) Multiple Species Conservation Program (MSCP) Subarea Plan. El Camino Real is upstream of San Dieguito Lagoon and the restoration efforts for the Lagoon under way by the San Dieguito River Park Joint Powers Authority (JPA) Restoration Plan.

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FWS-SDG-3236.1, SCH#1999071104

On December 12, 2002, we sent the City a comment letter on the notice of preparation (NOP) of a draft environmental impact report / environmental assessment for the project. From April 10, 2002, through October 25, 2005, we attended several meetings coordinated by the City of San Diego (City) on the proposed project. We also corresponded with the City through many electronic mails, providing feedback on the subjects addressed at the meetings and on the minutes for the meetings.

We appreciate the City's efforts to resolve major issues related to the potential project-related biological impacts prior to preparation of the DEIR, so that the document circulated for public review would reflect avoidance and mitigation measures that satisfy the requirements and recommendations of the Wildlife Agencies and other resource agencies (*e.g.*, California Coastal Commission, Regional Water Quality Control Board, U.S. Army Corps of Engineers). However, as the DEIR acknowledges, there are several outstanding matters that remain to be resolved through further coordination and consultation with the agencies. From our perspective, the primary outstanding matters are the project-related (a) potential negative impacts on the Federal and State endangered light-footed clapper rail (*Rallus longirostris levipes*, clapper rail), also a State Fully Protected Species, and (b) proposed wetland mitigation.

For the City's preferred alternative (*i.e.*, the Eastern Alignment Alternative, EAA), the new bridge would be set on a diagonal, completely separate from the existing El Camino Real bridge. The west edge of the new bridge would be approximately 50 feet east of the existing bridge at the south end, and approximately 90 feet east of the existing bridge at the north end. The new bridge would be 354 feet long, approximately 14 feet longer than the existing bridge, and 94 feet wide and would have two sets of three piers each. By comparison, the existing bridge is 340 feet long and 27 feet wide and has eight piers.

The EAA is the only build alternative for which the existing bridge would be retained and vacated by the City to the JPA for non-vehicular use as a trail for pedestrians, equestrians, and bicyclists. Changes to this bridge would be minimal. The new bridge for the EAA would also have pedestrian walkways and bike lanes in the road and bridge cross section.

As with all the build alternatives, the river banks under the new bridge would be excavated to have a steeper slope than currently exists. The steeper bank slopes would be protected from erosion by rip rap that would be toed into the river bed. The steep slopes and bridge shading would prevent successful planting of open stabilization materials, so such materials are not proposed for the new bridge abutments. The existing rip rap under the river bed that currently protects the sewer pipeline would be replaced if it were disturbed by construction. The river banks under the existing bridge would not be steepened.

As with all except one of the six build alternatives, the EAA would provide a JPA multi-use trail crossing under the north bridge abutment. The trail platform would be set at the 10-year flood level (approximately 13 feet above mean sea level). The under crossing would be paved, and would be approximately 12 feet wide. It would connect to the existing public trail along the north bank of the river east of El Camino Real, and the planned Coast to Crest Trail alignment on the north bank of the river west of El Camino Real.

In addition to the clapper rail, the sensitive wildlife species within the project's area of potential effect include least Bell's vireo (*Vireo bellii pusillus*, a Federal and State endangered species, vireo), white-tailed kite (*Elanus leucurus*, a State Fully Protected Species), American bittern (*Botaurus lentiginosus*), and the following State Species of Special Concern: yellow warbler (*Dendroica petchia*), Vaux's swift (*Chaetura vauxi*), white-faced ibis (*Plegadis chihi*), and northern harrier

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FWS-SDG-3236.1, SCH#1999071104

(*Circus cyaneus*). Of these, yellow warbler and the clapper rail are known to nest within the project alignment. While the clapper rail is an MSCP-covered species, the Federal MSCP permit does not authorize harm or lethal take for the species. And, since the clapper rail is a State Fully Protected Species, take authorization from the State is not feasible.

The losses of sensitive habitats associated with the EAA include the following: 4.57 acres of wetland habitats, over half of which are occupied by clapper rail; and 0.77 acre of coastal sage scrub (no habitat occupied by the coastal California gnateatcher). The DEIR proposes to mitigate for the losses of wetland habitats by the construction, creation, and enhancement of wetland habitats to the west of (*i.e.*, downstream) El Camino Real on the JPA's property (formerly the Boudreau property) and along the San Dieguito River. The DEIR provides considerable detail about the phases of the construction and creation of the proposed wetland mitigation habitats (*i.e.*, coastal brackish marsh, riparian scrub, and high salt marsh). Among the other biological mitigation measures included in the DEIR are the following, most of which pertain to project construction.

- a. Regardless of the alternative built, no construction would occur within the River corridor during the breeding season of the clapper rail and vireo (February 15 to September 15).
- b. Noise from construction activities outside of the River corridor would be prohibited from exceeding 60 dBA at the River corridor during the breeding seasons of the clapper rail and the vireo.
- c. Outside of the breeding seasons, construction in the River would occur during daylight hours.
- d. All construction equipment would be removed from the wildlife corridor at the end of each construction day.
- e. Staging areas and storage areas for equipment and materials would be located outside of the River.
- f. Temporary construction lighting has not been proposed as part of the project.
- g. A qualified biologist would train the construction crews and field workers to avoid unnecessary impacts to biological resources in the area.
- h. Prior to the start of construction, the project biologist would supervise the placement of orange construction fencing or equivalent along the limits of disturbance within and surrounding sensitive habitats as shown on the approved plans to protect adjacent environmentally sensitive lands including sensitive upland and wetland habitat.
- i. All construction activities (including staging areas) shall be restricted to the development areas as shown on the approved plan. A qualified biologist would monitor all phases of the construction to minimize impacts on sensitive species, and ensure that the construction activities do not encroach into biologically sensitive areas beyond the limits of disturbance as shown on the approved plan.
- j. If unauthorized disturbances occur or sensitive biological resources are discovered that were not previously identified on the Landscape Construction Documents and/or the revegetation/restoration monitoring exhibit, the contractor would be directed to temporarily

divert construction in the area of disturbance or discovery and immediately notify the appropriate people.

k.

After completion of construction, permanent low-sodium lighting would be installed along the El Camino Real bridge, and directed away from the MHPA and areas that might be used for wildlife movement.

To assist the City in avoiding, minimizing, and adequately mitigating project-related impacts to biological resources, and to assure that the project is consistent with the City's MSCP Subarca Plan, we offer our recommendations and comments in the Enclosure. The comments and recommendations are based on the information provided during the meetings we attended, the minutes from those meetings, our previous correspondence with the City (cited above), our knowledge of sensitive and declining vegetation communities in San Diego County, and our participation in regional conservation planning efforts. In summary, our primary comments address the following: (1) consultation between the City and the Wildlife Agencies; (2) need to revise the DEIR and recirculate it for public review; (3) future management of the reach of San Dieguito River upstream of El Camino Real; (4) construction-related impacts to the clapper rail during and outside of the breeding season; (5) reducing and re-quantifying the loss of clapper rail habitat; (6) inadequate analyses of the post-construction impacts on the clapper rail, including impacts from the projectrelated hydraulic and hydrologic modifications, and the proposed equestrian trail; (7) concerns about the proposed wetland mitigation and alternatives to consider; and (8) the need to resolve the matter of the Fairbanks Ranch Country Club's wetland mitigation obligations per the 1981 EIR, prior to proceeding with the proposed project.

The Wildlife Agencies appreciate the opportunity to comment on this DEIR. We are hopeful that further consultation between the City and us will ensure the protection we find necessary for the biological resources that will be affected by this project. Please contact Libby Lucas of the Department at (858) 467-4230 or Kurt Roblek of the Service at (760) 431-9440 if you have any questions or comments concerning this letter.

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Therese O'Rourke Assistant Field Supervisor U.S. Fish and Wildlife Service

Sincerely,

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Michael J. Mulligan for Deputy Regional Manager California Department of Fish and Game

Enclosure

cc: California Coastal Commission (Ellen Lirley)

Department of Fish and Game (Marjorie Caisley, Libby Lucas, Kris Vyverberg, Tamara Spear) Federal Highways (Steve Healow)

Regional Water Quality Control Board (Mike Porter)

- San Dieguito River Valley Conservancy (Craig Adams)
- U.S. Army Corps of Engineers (Stephanie Hall)
- U.S. Environmental Protection Agency (Elizabeth Goldmann)
- U.S. Fish and Wildlife Service (Carolyn Lieberman)

Wildlife Agency Comments and Recommendations on the Draft Environmental Impact Report for the El Camino Real Road Widening/Bridge Replacement Project, San Diego, California

Our comments and recommendations are not in order of priority, but rather in chronological order, with pre-construction considerations first, followed by considerations related to the construction period, followed by post-construction considerations.

PRE-CONSTRUCTION

Consultation with the Wildlife Agencies

1. As the DEIR indicates, it is likely that the effects of the proposed project on light-footed clapper rail (clapper rail) and least Bell's virco (virco) will require Section 7 consultation under the Act. The DEIR also indicates that the City contemplates applying to the Department for authorization for take of clapper rail under CESA, specifically section a 2080.1 of the Fish and Game Code. Because the clapper rail is a State Fully Protected Species, the Department cannot authorize its take. It is essential that the project result in no take of this species, and why, the continued pre-project consultation is critical.

2. As evidenced by the ensuing comments and recommendations, there are many matters that remain to be resolved for the project to proceed. Among the matters we wish to discuss in depth during further consultation are:

- a. the feasibility of the Central Alignment Alternative (e.g., the duration of the construction);¹
- b. the project-related impacts on the clapper rail and measures to avoid or minimize the impacts (see comments under the During Construction and Post-Construction sections);
- c. the proposed wetland mitigation (see comments under the Post-Construction section); and,
- d. the methodology and biological implications of the hydraulic and hydrologic studies conducted for the project (see comments under the Post-Construction section).
- 3. We do not yet have enough information to determine, with the exception of the No Build Alternative, which of the alternatives would have the least significant biological impacts. We must consider the impacts of the demolition of the existing bridge, both during and after its demolition. In this regard, we request some elaboration. Our understanding is that the EAA is the only build alternative that would not involve the demolition of the existing bridge. If the bridge is not demolished, please (a) clarify whether any structural changes

¹ The Central Alignment Alternative would have the same design as the EAA, but it would be centered on the existing alignment of El Camino Real, and would affect adjacent properties on the east and west sides relatively equally

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would be made to the deck or supporting structure, and (b) reconcile the retention of the bridge as is with the following statements in the DEIR which indicate that it needs to be removed or rebuilt: "the existing bridge does not completely convey the 100-year flood. Debris in the river carried during a large flood event could be trapped at the bridge, further decreasing capacity. Debris and flood flows could also damage the gas pipeline mounted on the bridge. Therefore, the entire bridge should be raised above the 100-year flood level" (page 1-4).

4. We would like to discuss with the City the possibility of (a) extending the existing MHPA designation along the San Dieguito River west of El Camino Real to the reach of the River east of El Camino Real (*i.e.*, so that the MHPA to the east of El Camino Real includes both the River and Gonzales Canyon), (b) developing and preparing Area Specific Management Directives for the clapper rail within this reach of the River, and (c) ensuring adequate funding to manage for this species. We may determine such measures to be necessary (in addition to other mitigation measures) if we are unable to determine during our consultation whether the project will result in significant indirect effects to the clapper rail.

Need to Revise the DEIR and Recirculate it for Public Review

5. Without sufficient information to support the conclusion, the DEIR concludes that there would be no project-related direct impacts on the clapper rail. As to indirect impacts on the species, the DEIR provides no discussion or analysis, but states, "potential indirect impacts to sensitive wildlife species would be significant but mitigable." The DEIR correctly states, "it is anticipated that ... [the Wildlife Agencies] will require further assessment and documentation of the potential project impacts" on the clapper rail. However, since the indirect impacts alone on the clapper rail may be significant (even with mitigation), the lack of any analysis in the DEIR for these impacts, with the exception of the direct loss of occupied habitat, undermines the basic purposes of CEOA. These purposes include, but are not limited to the following: (a) informing governmental decision-makers and the public about the potential, significant environmental effects of proposed activities; (b) identifying the ways that environmental damage can be avoided or significantly reduced; and (c) preventing significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible [CEQA Guidelines, section 15002(a)]. Deferring a thorough analysis of the direct and indirect impacts on the species until further consultation with the Wildlife Agencies is inappropriate. Given the protected status of the clapper rail and the importance of this population as a whole (see comment #7), the clapper rails within the project's area of potential effect warrant a thorough impact analysis and full mitigation for all significant impacts, both of which the DEIR lacks.

Based on the foregoing and ensuing comments and recommendations, we recommend that the information provided by the City to the Wildlife Agencies upon our request during the course of our consultation, be included in a revised EIR to be recirculated prior to certification for public review pursuant to Section 15088.5 of the CEQA Guidelines. This would be particularly appropriate, for example, if the consultation reveals a feasible project alternative or mitigation measures considerably different from those previously analyzed that would clearly lessen the environmental impacts of the project, but the City declines to adopt them [CEQA Guidelines, Section 15088.5(a)(3)]. While it is common for

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- consultations with the Wildlife Agencies to generate a level of detail (on project impacts and mitigation) not typically expected of or provided by CEQA documents, this recommendation derives from the lack of basic impact analyses in the DEIR, analyses needed to conform to CEQA. The revisions to the DEIR to be recirculated should reflect the impacts discussed during the consultation and provide (a) updated analyses of the project-related biological impacts for each alternative, and (b) additional measures necessary to mitigate the impacts to a level less than significant, including modifications to the proposed wetland mitigation.
- 6. Due to the high probability of project-related adverse effects to several pairs of clapper rails, the proposed loss of clapper rail habitat (including the southern willow scrub and the mulefat scrub adjacent to the occupied marsh see comment #9) should be offset prior to commencement of the project components that would result in the loss. The creation and enhancement of clapper rail habitat will take a number of years to mature and thus provide the basic constituent elements for this species (*e.g.*, cover, prey, refuge etc.). Therefore, it is imperative to the continued success and survival of clapper rails in the area that compensatory creation and enhancement occur prior to the destruction of their habitat to minimize the temporal loss of its functions and values. Ideally, this would occur at least two growing seasons prior to project-related impacts.²

DURING CONSTRUCTION

Light-footed Clapper Rail (clapper rail)

7. During a focused survey conducted in 2006, an estimated 31 pairs of clapper rail were detected within the approximately mile-long reach of the San Dieguito River between El Camino Real and the Morgan Run Gold Course upstream of the bridge to the east (Zembal et al., 2006). Citing John Konecny as the source of the information, the report entitled Natural Environment Study Report for the El Camino Real Road/Bridge Widening Project (Tierra Environmental Services, June 13, 2006; biology report) indicates that there were also four to five pairs reported west of El Camino Real in 2006, while another source informed the Department that there were one pair and three single males west of the bridge (D. Zembal, pers. comm., electronic mail, April 3, 2006).

The biology report suggests that results of surveys conducted east of El Camino Real since 2004 indicate that the clapper rail population in the area has expanded rapidly. We are not aware of data that demonstrates that the population east of El Camino Real has expanded rapidly. It is not known how long or at what density clapper rails have occupied the reach of the San Dieguito River east of El Camino Real.³ Our understanding is that formal

² In an electronic mail dated November, 28, 2004, to Katherine Hon and copied to several people, the Department stated, "given that the project is likely to potentially affect the clapper rail, it would be best to have the mitigation in place prior to commencement of construction."

³ As described in the report entitled Status and Distribution of The Light-fooled Clapper Rail in California, 2006 (Zembal e al., 2006), from 2004 through 2006, the surveys encompassed progressively longer reaches of the River, until in 2006, they incorporated occupied habitat not previously surveyed southeast of the Morgan Run Golf Course. Clapper rails may have been in this reach of the River prior to its re-alignment for the Fairbanks Ranch Country Club (FRCC). The 1981

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focused surveys for the clapper rail were not conducted along the reach of the San Dieguito River east of El Camino Real prior to 2004. This recently discovered subpopulation of clapper rail is the third largest in the state and the largest ever recorded in a freshwater marsh (Zembal *et al.*, 2006). It is critical that the population be protected. The following comments address some of our concerns about impacts on the clapper rail during construction.

- a. We are concerned about the negative impacts on the clapper rail that might occur during the construction of the project, both during and outside of the species' breeding season. Such impacts include, but are not limited to, (a) direct impacts such as injury or death of a clapper rail, and (b) indirect impacts such as (i) disruption of breeding activities, (ii) disruption of daily activities such as foraging, (iii) displacement, (iv) resultant reduced genetic diversity among the clapper rails within the area, and (v) reduced productivity among the displaced individuals in subsequent breeding season(s). As the DEIR mentioned none of these, much less analyzed them, it will be necessary to discuss these in depth during the future consultation, and address them in the revised and recirculated DEIR.
- b. As the clapper rail is a resident species, we do not believe that the measures proposed for implementation during project construction are adequate to avoid impacts on the species either during or outside of the breeding season. And, depending on the definition of "river corridor," the proposed prohibition of construction activities within the river corridor during the breeding season may not be sufficient to protect the clapper rail from significant impacts.
- c. The potential effects, if any, on the clapper rail of the ground vibrations from driving the piles to a depth of 90 feet requires consideration.
- d. Construction-related noise is one aspect of the construction of concern to us, and the proposed noise controls during the breeding season may not be sufficient to protect the clapper rail from significant impacts. The DEIR indicates that peak noise levels may be 85 to 90 A-weighted decibels (dBA) at a distance of 50 feet during most construction activities, and hourly average noise levels at 50 feet from the edge of the work area would be anticipated to be 70 to 80 dBA Leq.⁴ According to the DEIR, construction noise levels at 50 feet of approximately 80 dBA Leq would be expected from work on the roadway, and noise levels of approximately 86 dBA Leq would be expected from work on the bridge. The distance to the threshold noise level of 60 dBA Leq would be a radius of 500 feet from a point source on the roadway, and 1,000 feet from a point source on the bridge. Appropriately, the DEIR prohibits construction activities that would generate 60 dBA Leq within the noise contour of 1,000 feet of the river during the avian breeding season. We wish to discuss the construction-related

Final Environmental Impact Report for the FRCC does not include them in the list of species within the River, but the species list is clearly incomplete.

4 Examples of common outdoor noise levels are (a) 80 dBA at a distance of 50 feet from a diesel truck going 50 mlles per hour, (b) 100 dBA at a distance of 3 feet from a gas lawn mower, and (c) 110 dBA at a distance of 1,000 feet from a jet fly-over (DEIR, pages 3.11-1 and 3.11-2).

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noise during the consultation, specifically, (a) what "river corridor" means, (b) what peak levels might occur within the 60 dBA Leq standard, (c) noise generated by the pile driving to a depth of 90 feet, and duration of the noise, and (d) what measures will be necessary to adequately attenuate noise levels outside of the breeding season.

- e. We recognize that a biological advantage to the EAA is that its construction would span two breeding seasons, while the construction of the other build alternatives would span three breeding seasons. This aspect of the EAA, relative to the other build alternatives, would be beneficial to the clapper rail and other sensitive species in the project vicinity. However, we wish to further discuss with the City the Central Alignment Alternative (CAA), and the expected duration of construction of the bridge and the road segments north and south of the bridge for both the EAA and the CAA.
- f. The DEIR requires that the biologist responsible for construction monitoring have a minimum of a Bachelor's degree in biology, botany, or related science and will have at least two years of experience in monitoring native habitat restoration projects in southern California. We request that the biologist have experience in surveying for clapper rail and be knowledgeable about the species' requirements and behaviors.
- g. The breeding season for the clapper rail should be considered to be February 15 through September 30.

Habitat Losses

- 8. In the event that the EAA remains the City's preferred alternative and the one that is built, the Wildlife Agencies would like to discuss the possibility of reducing its width, and thereby reduce it biological impacts. As the City proposes it, the EAA would retain the existing bridge, which would be dedicated to non-vehicular use as a trail for pedestrians, equestrians, and bicyclists. The new bridge is also proposed to have pedestrian walkways and bike lanes. While we understand that some space is necessary to accommodate drivers of broken-down vehicles, it is not evident that all the space provided is necessary. Nor is it clear why, given the proposed trail on the existing roadway and bridge, bike lanes are proposed for the new bridge and roadway. Eliminating the non-vehicular amenities (*i.e.*, bike lanes) from the new bridge would reduce its footprint and reduce its direct impacts to the habitats and species present.
- 9. The Wildlife Agencies believe that the DEIR underestimates the project-related loss of clapper rail habitat. Table 3.12-8 on page 3.12-44 of the DEIR indicates that the EAA would result in the loss of 0.77 acre of clapper rail habitat, comprised solely of disturbed coastal brackish marsh. When seeking refuge from high flows (Zembal *et al.* 1989, Shuford 1993) or seeking out alternative forage (*e.g.*, grasshoppers), clapper rails will use riparian and upland habitat adjacent to the habitats supporting the emergent vegetation in which they reside. Although used infrequently, this habitat may be extremely important at reducing mortality during high flows. It is possible that, during the heavy flows of the 2004-2005 rainy season, the clapper rails in the marsh to the east of El Camino Real used the adjacent habitat along the northern bank of the San Dieguito River to escape the flows. Because such habitat is important to clapper rails we consider it as clapper rail habitat.

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Therefore, the southern willow scrub (0.10 acre), and the disturbed mulefat scrub (0.40) within the EAA alignment and adjacent to the occupied disturbed coastal brackish marsh should be added to the 0.77 acre of clapper rail habitat (*i.e.*, the total should be 1.27 acres).

10. It is not clear from the DEIR whether the impacts from the proposed 500 feet of buried bank protection on the eastern side of the bridge are included in the impact analysis. Figure 3.12-5 depicts the outline of impacts associated with the EAA; however, impacts from the bank protection are not shown. Please revise all applicable figures to reflect the location of the bank protection, analyze the acreage and habitat types affected by the bank protection, and provide appropriate mitigation.

11. In a May 12, 2004, electronic mail to Katherine Hon and copied to several people, the Department inquired as to the status of the CEQA review for the JPA's undercrossing for equestrian use. The electronic mail stated the following.

If it has not yet gone through CEQA, it would be appropriate for the Bridge Replacement Project and the equestrian trail (at least the portion of it within the area of potential effect of the Bridge Replacement Project) to be considered under the same CEQA analysis (and NEPA if the trail is funded by federal sources). Since the design of the proposed bridge is affected by the need for the undercrossing (and possibly vice versa), these projects are definitely related and warrant concurrent CEQA analysis per Section 15003(h) of the CEQA Guidelines which states, "The lead agency must consider the whole of an action, not simply its constituent parts, when determining whether it will have a significant environmental effect..." If the equestrian trail has already gone through CEQA, the CEQA/NEPA document for the Bridge Replacement Project should discuss what, if any, aspects of the proposed bridge the approved alignment/design of the trail dictates.

We have no record of receiving a response to this electronic mail. Our concerns about piecmealing remain as it is not clear whether the direct losses of sensitive habitats, or any related impacts (see comment #16), from the proposed multi-use trail under the bridge were accounted for in the impact analysis. Please provide a quantification of the habitat losses and, if they had not already been accounted for, increase the mitigation obligations accordingly.

12. The DEIR discusses the parcels that the project may affect (page 3.1-3). One of these (APN 302-090-28, PIF# 10) is a parcel whose development was the subject of a CEQA document (mitigated negative declaration, MND) the City circulated in December of 2004. The project name was Villa Paraiso and the Wildlife Agencies commented on the MND. Our understanding is that approval of the project was conditioned on meeting several requirements to protect the sensitive wetlands on site. Please explain (a) how, if at all, the widening of Via de La Valle would affect the ability of the Villa Paraiso project to meet its obligations to enhance and protect the on-site wetlands and/or (b) how the widening of Via de La Valle would exacerbate the impacts for which the measures to protect wetlands were imposed, and (c) how the detrimental effects would be mitigated.

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POST-CONSTRUCTION

The two primary concerns we have about the post-construction aspects of the project are (a) 13. the potential for short- or long-term type change or diminution in value of clapper rail habitat resulting from project-related hydrologic and hydraulic effects, and (b) the adequacy of the proposed wetland mitigation areas and plans.⁵ Though hydrologic and hydraulic studies were conducted for the project, the analyses therein were not used to assess potential impacts on clapper rail habitat. Nor does the DEIR provide such an assessment, which we requested in our NOP comment letter. In an effort to determine whether the studies provide sufficient information to make such an assessment, Senior Engineering Geologist (Kris Vyverberg) and Associate Hydraulic Engineer (Marjorie Caisley), both with the Department, reviewed the document entitled Hydraulic Study for El Camino Real Bridge Project on the San Dieguito River (Rick Engineering Company, April 2006; Hydraulic Study) and pertinent excerpts from the DEIR. Their review generated several comments and questions, responses to which will influence our determination as to the adequacy of the proposed locations and designs of the wetland mitigation areas, and as to whether the Eastern Alternative or the Central Alignment Alternative would be less biologically damaging.

In general, Ms. Vyverberg and Ms. Caisley found that the hydraulic study does not provide sufficient information or analysis for a meaningful evaluation of the environmental consequences of the proposed project. More specifically, in the absence of the information outlined below, the impact of this project on the habitat supporting the clapper rail population cannot be determined within the project's area of potential effect. Our review suggests that there could be changes in water depths, water velocities, and the physical form of the channel all of which collectively define the physical habitat the rails depend on. In fact, the DEIR indicates that upstream of the River. The information necessary to determine the magnitude of change to this habitat and the associated potential effects to the clapper rail has yet to be provided; and in its absence, the proposed project should be assumed to be a threat to the population. Specifically, the additional information and analyses required for a meaningful evaluation of the environmental consequences of the proposed project, and to assess the adequacy of the proposed wetland mitigation area, are outlined below.⁶

a. An explanation is needed for why the piers of the existing bridge are modeled in an unconventional manner and differently from the method used for the new bridge. The piers have been coded as ground points rather than as bridge piers [Appendix A, HEC-RAS Output for the Existing Conditions, page 4, figure for River Station (RS) 2.614, and pages 15-16, HEC-RAS Project Data, Hydraulic Study, April 2006]. Accounting for the hydraulic influence of piers in this way likely results in greater channel

⁵ Though we provide these comments in the Post-Construction section, the mitigation for the losses of clapper rail habitat should occur prior to the completion of project construction, as addressed in comment #6.

⁶ Ms. Vyverberg and Ms. Caisley did not have the entire DEIR available for review. Their comments are provided here in their entirety, but there may be information that they request that is available in the DEIR.

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roughness values, reduced channel capacity, and increased water surface elevations than would be expected from a conventional approach.

- b. A discussion is needed on the discrepancy between upstream locations and the water surface elevations (WSE) at section 2.439. The WSE is higher downstream at section 2.439 than at the two sections immediately upstream for the 50- and 100-year recurrence interval events (HEC-RAS Work Map for the Preferred Alternative, Map Pocket 2, Hydraulic Study, Appendix B, HES-RAS Output for the Preferred Alternative, page 3, River Stations 2.59, 2.524, and 2.439). This may be an error in modeling or perhaps an incorrect accounting of flow exiting the channel over the weir and into the wetland area.
- c. Clarification is needed on the ineffective flow area selected for the proposed conditions downstream of the new bridge in the wetland mitigation area. The ineffective flow area on the left bank of RS 2,439 appears to be incorrectly located at station 4220; the berm is actually located at station 4620 (Appendix B, HEC-RAS Output for the Preferred Alternative, page 7, RS 2,439, and HEC-RAS Work Map for the Preferred Alternative, Map Pocket 2, Hydraulic Study). Ineffective flow boundaries define bodies of ponded or recirculating water (e.g., eddies downstream of structures) that are not contributing in a meaningful way to the overall conveyance of the flow downstream. Locating the ineffective flow boundary at station 4220 suggests graphically and hydraulically that the effective channel cross section is wider than it actually is. The net result of using a wider channel than actually exists is artificially improved hydraulics through and downstream of the proposed bridge.
- d. The following information is needed on the hydraulic performance of the proposed weir structures, which otherwise cannot be evaluated from the information provided:
 - (i) the water surface elevations in the wetland at the range of flow events being considered (*i.e.*, low flow undefined in the report, and the 10-, 20-, 50-, and 100-year recurrence interval events);
 - (ii) clarification on whether the weir coefficient in the equations was adjusted to reflect that the weirs are submerged at the 50-and 100-year recurrence interval flow events;
 - (iii) clarification on whether the energy between the flow over the weir and the flow remaining in the channel were balanced when determining how much flow was left in the channel; and,
 - (iv) clarification on which of the two values reported for weir flow is correct, and a discussion on the difference between the values as determined by the Fluvial-12 model [e.g., 7,864 cubic feet per second (cfs) at the peak 100-year flood discharge] versus those determined using the HEC-RAS model (9,385 cfs, Appendix B, page 3, Reach-1, RS 2.59).
- e. The following information is needed on the design and hydraulic function of the wetland mitigation area, the effectiveness of which cannot be evaluated otherwise:

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- (i) a discussion on the discrepancy between the design of the inlet to the wetland mitigation area as specified in the Hydraulic Study [*i.e.*, six 5-foot reinforced concrete pipe (RCP) culverts versus the single 3-foot RCP culvert specified in the main body of the report (respectively, Attachment 2, page 14 of the Hydraulic Study versus Section 5, Brackish Marsh Mitigation Area Hydraulics, paragraph 2, page 10 and Figure 3.12-6, El Camino Real Mitigation Concept Plan];
- (ii) the location of the River at any given flow relative to the location of the proposed inlet;
- (iii) the flow event at which the inlet becomes active and water begins to flow into the wetland area;
- (iv) the range of flows over which the wetland is inundated, to what depths, and for what period of time;
- (v) the typical water surface elevations in the wetland under normal, non-flood conditions; and,
- (vi) the effect that the radical change in the recommended inlet size will have on wetland operation and function.
- f. A complete scour analysis is needed of the proposed structures on bed and bank erosion. The hydraulic study uses a proprietary model (Fluvial-12, Chang 1988) not generally available to us to evaluate changes in general stream scour conditions associated with the proposed project. No evaluation of the local scour associated with local obstructions to flow by a bridge pier or abutment is provided. An evaluation of project-related impacts on bed and bank erosion and the impact of such erosion on the integrity of the physical habitat requires the following information.
 - (i) A transparent consideration is needed of general scour effects using a nonproprietary and standard model (such as HEC-RAS) and the methods described in Hydraulic Engineering Circular No. 18 (HEC-18, Evaluating Scour at Bridges, FHWA, 2001). HEC-18 presents the state of knowledge and practice for the design, evaluation and inspection of bridges for scour. A scour analysis using the methods in HEC-18 may also be required if the proposed project uses federal funds.
 - (ii) An analysis is needed that considers the project-related effects on general as well as local scour conditions, including the influence of debris and impinging flows. The DEIR indicates that the height of the bridge will be 3-feet higher than the elevation otherwise required to pass the 100-year recurrence interval (Section 2.2.11, page 2-16), but neither the DEIR nor the hydraulic study address whether the height of the water surface elevation includes any consideration of the confounding influence of flood debris on freeboard calculations.

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- g. Consideration is needed of the potential influence of tidal flux on the hydraulic performance of the proposed structure and river channel. Although this may have been considered and determined to be of no engineering or biological consequence, there is no mention in the various project documents of any consideration given to the effect (if any) of storm tides on the proposed design.
- h. Consideration is needed of a project alternative that includes a longer bridge span. The span length of the proposed bridge is essentially the same width as the existing bridge (355 feet and 340 feet, respectively) even though the possible effective width of a new structure located 75 feet upstream could be 490 feet long. The proposed span length results in an undersized bridge opening and higher water velocities and stream channel scour that the project proponents address by over-steepening the stream banks to increase the capacity beneath the bridge. Lengthening the bridge span will provide a larger capacity opening beneath the bridge, will reduce local scour, eliminate the need to line the channel beneath the bridge with rock, eliminate the need for rip rap on the banks, and allow the banks beneath the bridge to be laid back to a slope flatter than the 1.5:1 slope proposed.

Locations of the Proposed Wetland Mitigation

14. One of the main subjects of discussion during the meetings the City held on the proposed project was the mitigation for the project-related losses of wetlands. The locations of the proposed mitigation for the loss of southern willow scrub and mulefat scrub (*i.e.*, along the southern bank of the River, just downstream of El Camino Real) appear acceptable as the mitigation that occurs there may adequately meet the compensation requirements for losses of acreage, functions, and values (*e.g.*, providing vireo habitat and fringe clapper rail habitat). However, though the gaps in the habitat have been lessened based on previous discussions, it is not clear whether these areas would remain in their current state (*i.e.*, disturbed and agriculture) or if there can be further modifications to actively restore them to provide greater contiguity to the other proposed mitigation areas.

The brackish marsh habitat proposed as mitigation would occur southwest of the bridge and result in an 11.35-acre area being converted from tomato fields. The area would be surrounded on two sides (north and west) by berms approximately 14 feet tall (final grade) with 10-foot wide tops. A 100-foot buffer of upland vegetation and the existing El Camino Real would create the eastern and southern boundaries. The area would receive fresh water from the San Dieguito River during lesser flows via a 36-inch corrugated pipe, and during larger events a spillway would allow for overflow into the area. The enclosed cell surrounded by berms and roadway on all sides would be an artificial system with little biological connectivity. A ramp is proposed for clapper rail access across the berm; however, clapper rail usage of this type of access is unknown.

The likelihood of the success of creating and managing brackish marsh habitat in an area which does not experience tidal influence and relies on saline soils to mimic salt water presence is questionable. There is a high potential for type conversion as the salts leach from the soils over time. The project area does not experience tidal influence due to (a)

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historical changes in the watercourse itself (primarily channelization), (b) year-round freshwater flows (versus primarily in the winter only), and (c) frequent blockage of the River's mouth. The brackish marsh creation area would receive flows (freshwater only) after precipitation events large enough to allow flow into the corrugated metal pipe and over the inlet weir. Brackish and salt marsh habitat is regularly inundated in sequence with the tidal prism at some point in time, whereas tidal influence may never reach this far upstream again.

San Dieguito River will become further channelized with the presence of a berm on the southern bank of the River and the construction of a larger bridge within the 100-year floodplain. Considerable channelization has already occurred in this system; as the DEIR states, "the area was generally wetlands (swamps, and overflow lands and tidelands) and a braided river channel." Channelization of watercourses may provide a human benefit by temporarily alleviating flooding and loss of property, but throughout the country this practice has resulted in inestimable losses of wetland habitats, functions, and values. Restoration of riparian corridors almost always involves reconnecting the floodplain/ geomorphology as the arteries of the system. The proposed artificial means of creation may provide habitat for a certain target species; however, as a whole, the River system will be further degraded.

As to the suitability of the proposed location of the mitigation for the loss of clapper rail nesting habitat, the transmission towers and lines within the utility corridor adjacent to the western boundary of the mitigation area must be considered. They likely serve as perches for raptors which prey on clapper rail chicks, which also renders the mitigation area inappropriate.⁷ The presence of the utility corridor, especially the underground lines, could hamper any wetland restoration efforts by leaving a barrier (*i.e.*, a berm to protect the underground lines) across the floodplain after excavation for the restoration. Removal or other means of lessening the impacts of the utility corridor must be considered if high value and naturally functioning wetlands in this area are to be restored.

The high salt marsh mitigation area is located west of the proposed brackish marsh site. The two sites are separated by SDG&E's right-of-way. The DEIR provides very little information on the specifics of this mitigation site. It appears that the area would be excavated to create a 3-acre depression, but it is unclear how the area would be inundated or connected to river flow, tidal regimes, or groundwater. This mitigation area would be surrounded by agriculture, and it appears it would have no connection to the proposed or existing native habitats.

The future discussions regarding the questions above on the hydraulic and hydrologic studies should inform us about certain aspects of concern to us about these mitigation plans. In addition to other mitigation options mentioned in this letter, mitigation

⁷ The JPA property is split diagonally by a 150-foot wide utility corridor running southeast to northwest between El Camino Real and Via de la Valle. The utility corridor is controlled by San Diego Gas and Electric (SDG&E). In addition to the high voltage steel transmission towers are within the utility corridor above ground, there are three pipelines below ground. The pipelines carry fuel and high-pressure gas.

approaches that better complement the ongoing restoration efforts in San Dieguito Lagoon/River should be considered.

15. The Wildlife Agencies have repeatedly indicated that some of the mitigation for the projectrelated loss of wellands and clapper rail habitat should occur along the northern bank of the San Dieguito River starting immediately upstream of the existing bridge, and we have requested that any outstanding issues regarding the previously required mitigation in this area be resolved before the City proceeds with this project.

Per the 1981 Environmental Impact Report (EIR) for the Fairbanks Ranch Country Club (FRCC), part of the FRCC's mitigation obligation was to create an area of riparian vegetation along the northern bank of the San Dieguito River. The approximately 1700-foot long mitigation area along the bank was to have averaged 250-350 feet in width, occupying over nine acres.⁸ This area is roughly depicted in the figure at the end of this Enclosure. During the April 4, 2005, meeting held by the City, the City explained that its 26-year lease of the City lands to the Polo Club Fields (*i.e.*, the leasehold adjacent to the northern bank of the San Dieguito River) which commenced in 1986 does not reflect the mitigation on the property referenced in the FRCC EIR. The City also noted that the failure of FRCC to carry out the required mitigation for the 1981 project is a code enforcement issue, and that the City would investigate it. We would like to discuss what actions, if any, the City has made to resolve this matter.⁹

We understand that the projected increase in the 100-year velocities upstream of the proposed bridge require stabilization of the north bank of the San Dieguito River, and that this may impair efforts to provide mitigation along the north bank. However, we wish to further discuss this potential mitigation location with the City. We also request clarification on the following statement in the DEIR (page 3.7-27, Mitigation Measure 7.1), "the slope would be refilled and re-contoured and revegetated with native coastal sage scrub plant materials." This seems to conflict with information that the proposed riprap area would not be vegetated.

16. As addressed in comment #11, it is not apparent from the DEIR that the City analyzed the indirect (or any) impacts from the JPA's proposed trail under the bridge. Among the related subjects that we will discuss during the consultation will be (a) relocating the trail, (b) the impacts of the trail users on the clapper rail and other sensitive species in the San

⁸ This does not include FRCC's entire mitigation obligation north of the San Dieguito River. The riparian vegetation was to have extended farther upstream by at least double the 1700-foot reach, and was to have reached a maximum width of approximately 500 feet.

⁹ The minutes from the April 4, 2006, meeting correctly reflect that the Wildlife Agencies indicated that neither agency has the authority to require the City to select a particular mitigation site if several are adequate. The minutes go on to state, "If it can be demonstrated that emergent marsh can be established on the JPA site, then that site is acceptable for mitigation for El Camino Real Road/Bridge Project." We do not agree with this because the mitigation for the establishment alone of the marsh will not necessarily mitigate for the loss of clapper rail habitat; there are other factors involved. Also of note from the minutes is the following statement, "The Coastal Commission said that if there is biological benefit to mitigating outside of the Coastal Zone, they would consider such a plan." The Coastal Zone extends to El Camino Real (*i.e.*, it does not include the potential mitigation area to the east of El Camino Real).

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Dieguito River, (c) the effects (e.g., erosional runoff) of the paved trail on the downslope substrate and habitat, (d) the management of the horse manure, (e) cowbirds, and (f) measures to adequately mitigate for these impacts.

Another alternative to consider as part of the mitigation to enhance the existing clapper rail 17. habitat would be to provide a transition of wetland (e.g., southern willow scrub, mule fat scrub) to upland habitat along the southern bank of the River east of El Camino Real. The City's preferred alternative at the time of the April 10, 2002, meeting proposed to widen the river by excavating approximately 8.7 acres of upland along its southern bank. The project then proposed to widen the river by up to 100 feet for a distance of 800 feet upstream of (i.e., east of) El Camino Real and up to 300 feet for 1,000 feet downstream of the road. Project construction is proposed to occur in phases. It was subsequently determined that this extensive widening was not necessary to achieve no net rise in the 100-year water surface elevation, and the Wildlife Agencies expressed concern about the scale of the widening and its potential impacts on the extant habitat. The point is that if it was previously feasible to use some of the property along the southern bank of the San Dieguito River for this project, it must still be feasible to do so. A widening of 100 by 800 feet would occupy approximately 1.84 acres. We would like to discuss the possibility of incorporating this area into the mitigation by laying back (not widening the bed of the River) the slope and planting it with appropriate vegetation. This would provide an extension to the clapper rail habitat and an area for their use as a refugium and/or foraging.

Nature of the Proposed Wetland Mitigation

- 18. The DEIR states (and the City has explained to us before), "no sites for potential enhancement of coastal wetland habitat were found in the immediate project vicinity." Therefore, the City proposes to provide a considerable excess of creation of wetland habitat than will likely be required to compensate for the project-related losses. Because of our concerns about the proposed wetland creation, we requested that the City further investigate the enhancement opportunities within the San Dieguito River that the City may not have considered. We did not find evidence in the DEIR that the City had done so. We request again that the City consider opportunities for long-term / in-perpetuity invasive plant removal upstream of the existing bridge between the bridge and Morgan Run golf course, or beyond (at the first occurrence of invasive plants). We believe that both FRCC and MRGC are obligated to remove invasive plants, but we do not know the duration or aerial extent of their obligations. We request that the City investigate the terms of these obligations. If they do not include all the areas within the entire reach of the San Dieguito River between the bridge and the MRGC infested with invasive species and/or if the obligations are short-term, then long-term exotic species removal in those areas could partially or wholly replace excess creation proposed for the enhancement component of the mitigation, and could prove more ecologically beneficial (for wetland functions, including clapper rail needs) than the proposed creation of habitat.
- Included in the Planting Plan for Riparian Scrub habitat are sensitive species such as San Diego marsh elder (*Iva hayesiana*) container stock and Palmer's sagewort (*Artemesia palmeri*) seed. These species are already present naturally. Therefore, to sustain the

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genetic stock of these sensitive plant species, cuttings and seeds should be collected from those individuals on site and grown out at a nursery for later reintroduction during restoration activities. The locations of each species should also be documented and provided in a figure in the final EIR. Impacts to the naturally occurring specimens should be avoided and/or minimized.

20. The proposed wetland mitigation is intended to provide species specific mitigation by, for example, applying a mitigation ratio of 4:1 to the habitat occupied by the clapper rail and meeting the 4:1 ratio with creation only. The success criteria for this mitigation are based solely on the condition of the vegetation to be planted. Success criteria specific to the use of the mitigation area by the clapper rail should also be included. Absent exceptional circumstances (e.g., clapper rail do not persist in the project area for reasons unrelated to the project), there must be evidence that the clapper rail uses the created habitat before it can be considered a success.

Water Quality and Noise

21. The DEIR explains that the created drainage ditches along El Camino Real and Via del la Valle would serve as best management practices (BMPs) by filtering contaminants out of the runoff from the roads. Proposed improvements to the drainage ditch would result in a trapezoidal channel 22 feet wide and 6 feet deep with the ability to handle 616 cfs (Q_{100}) from a 631-acre watershed. The alternative to this mentioned in the DEIR is an underground storm drain. Please explain how a channel of this capacity or an underground storm drain would provide water quality remediation. It is imperative that road improvements such as this one also include improvements to water quality to address concerns for the release of contaminants such as polyaromatic hydrocarbons, fecal coliform, pesticides, etc. which are regularly discharged into surface waters. We recommend that a treatment facility (e.g., retention basin, vault system or an appropriately designed vegetated swale) be incorporated into the project to provide the necessary mitigation to offset the deleterious effects of storm water pollution on the sensitive species and habitats found in the river corridor. For example, research indicates that low fertility and egg-hatching success in northern populations of clapper rail may result from contaminants (Eddleman et al., 1998).

We also request information on the BMPs that will be incorporated into the project design to accept flows from the bridge prior to their entry into San Dieguito River.

22. If the EAA is built, the sound of traffic will travel farther into the clapper rail habitat than it does now. We request that the City investigate and incorporate into the bridge and road design measures to dissipate the noise from traffic. For example, porous Elastic Road Surfaces (*i.e.*, asphalt-rubber) and/or noise dampening barriers could provide a reduction in noise pollution below harmful and disruptive levels.

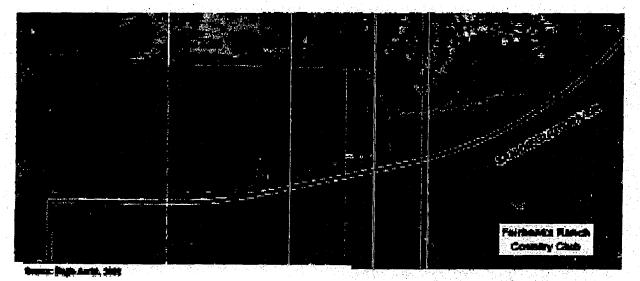
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The figure below is associated with comment #15.





20 455 Ú 200 Peru Contractor a 200 fact This image is excerpted from the DEIR for a project of the Olivenhain Municipal Water District (San Dieguito Water Storage and Project, Figure 2-1). Ignore the double yellow line.

approximate mitigation area.

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DFG R5 Southcoast Region

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STATE OF CALIFORNIA THE RESOURCES AGENCY

ARNOLD SCHWARZENEGGER. Governor



FACSIMILE TRANSMITTAL

TO: Donna Clark, Environmental Planner City of San Diego Development Services Center Telephone (619) 446-5387 Fax (619) 446-5499

> State Clearinghouse Fax (916) 323-3018

- FROM: Libby Lucas South Coast Region 4949 Viewridge Avenue San Diego, California 92123 Telephone (858) 467-4230 Fax (858) 627-3984
- DATE: 10/23/06

TIME: 1735

OF PAGES SENT INCLUDING TRANSMITTAL SHEET 20

COMMENTS:

This is the joint comment letter from the Department of Fish and Game and the U.S. Fish and Wildlife Service on the Draft Environmental Impact Report for the El Camino Real Road Widening/ Bridge Replacement Project (SCH# 1999071104). We will also send the City the letter by regular mail, and copies to the cc's by regular mail.

IF YOU DO NOT RECEIVE ALL OF THE PAGES INDICATED PLEASE CALL THE SENDER AS SOON AS POSSIBLE.



Arnold Schwarzenegger Governor STATE OF CALIFORNIA Governor's Office of Planning and Research State Clearinghouse and Planning Unit



Sean Walsh Director

October 24, 2006

Donna Clark City of San Diego 1222 First Avenue, MS 501 San Diego, CA 92101

Subject: El Camino Real Road/Bridge Widening SCH#: 1999071104

Dear Donna Clark:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on October 21, 2006, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Serving Roberts

Terry Roberts \checkmark Director, State Clearinghouse

াষ্ট্ৰ প্ৰকাহ মহাৰ্চ্য হিচাপেন্দ্ৰসূত্ৰ বহাৰাত্ৰ যে যে বা বিভিন্ন পৰ্যন্ত সময়ত আগত কৰ্মবন্ত্ৰ বহাৰ বহাৰে দু

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For 619-446-3449

STATE OF CALIFORNIA

Arnold Schwarzenegger, Governor

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364 SACRAMENTO, CA 95814 (916) 653-4082 Fax (916) 657-5390 Web Site www.nahc.ca.gov

September 18, 2006

Ms. Donna Clark **City of San Diego** 1222 First Avenue, MS 501 San Diego, CA 92101 RECEIVED OCT 0 4 2006 STATE CLEARING HOUSE

Re: <u>SCH#1999071104</u>; <u>CEQA Notice of Completion</u>; <u>Development Permit for Road widening</u>, <u>El Comino Real and</u> <u>Ridge Replacement</u>; <u>San Diego County</u>, <u>California</u>

Dear Ms. Clark:

Thank you for the opportunity to comment on the above-referenced document. The California Environmental Quality Act (CEQA) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR per CEQA guidelines § 15064.5(b)(c). In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the area of project effect (APE), and if so, to mitigate that effect. To adequately assess the projectrelated impacts on historical resources, the Commission recommends the following action: √ Contact the appropriate California Historic Resources Information Center (CHRIS). The record search will

determine:

- If a part or the entire APE) has been previously surveyed for cultural resources.
- If any known cultural resources have already been recorded in or adjacent to the APE.
- If the probability is low, moderate, or high that cultural resources are located in the APE.
- If a survey is required to determine whether previously unrecorded cultural resources are present.

 $\sqrt{1}$ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.

The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for pubic disclosure.

The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.

√ Contact the Native American Heritage Commission (NAHC) for:

- * A Sacred Lands File (SLF) search of the project area and information on tribal contacts in the project vicinity who may have additional cultural resource information. Please provide this office with the following citation format to assist with the Sacred Lands File search request: <u>USGS 7.5-minute quadrangle citation</u> with name, township, range and section:
- The NAHC advises the use of Native American Monitors to ensure proper identification and care given cultural resources that may be discovered. The NAHC recommends that contact be made with Native American Contacts on the attached list to get their input on potential project impact, particularly the contacts of the on the list.

 $\sqrt{1}$ Lack of surface evidence of archeological resources does not preclude their subsurface existence.

- Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5 (f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
- Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.

 $\sqrt{}$ Lead agencies should include provisions for discovery of Native American human remains or unmarked cemeteries in their mitigation plans.

* CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens.

 $\sqrt{}$ Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the CEQA Guidelines mandate procedures to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

<u>V</u> Lead agencies should consider avoidance, as defined in § 15370 of the CEQA Guidelines, when significant cultural resources are discovered during the course of project planning.

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely, Dave Singleton Program Analyst

Cc: State Clearinghouse Attachment: List of Native American Contacts

Appendix F

Review of Section 3.8 of EIR for El Camino Real Road and Bridge Widening Project, San Diego, California, Ninyo & Moore, December 6, 2012.



December 6, 2012 Project No. 107179004

Mr. Dean Marsden City of San Diego Engineering and Capital Projects Department c/o Ms. Lisa Lind Recon Environmental 1927 5th Avenue San Diego, California 92101

Subject: Review of Section 3.8 of EIR for El Camino Real Bridge and Road Widening Project San Diego, California

Dear Mr. Marsden:

In accordance with your request, we are providing this letter in support of the City of San Diego – El Camino Real Bridge/Road Widening Environmental Impact (EIR) document in support of the California Environmental Quality Act (CEQA) requirements. The El Camino Real Bridge/Road Widening project involves the widening of El Camino Real including the existing bridge over the San Dieguito River to a four-lane major road.

Based on the results of our Geotechnical Update (Ninyo & Moore, 2012), we recommend the following updates to the EIR document:

- Within the Local Geologic Setting subsection of Section 3.8.2.2, the most recent geologic map should be referenced (Kennedy and Tan, 2008). Furthermore, the term "Baypoint Formation" should be updated to "Old Paralic Deposits", as described by Kennedy and Tan (2008).
- Within the Local Tectonic Settings/Seismicity subsection of Section 3.8.2.2, the maximum moment magnitude for the Rose Canyon fault, the closest fault to the study area, should be updated to 7.2.
- Table 3.8-2 should be updated to present the updated distances to principal active faults and the maximum moment magnitudes of those faults. The updated fault distances and magnitudes are given in Table 1 below.

5710 Ruffin Road • San Diego, California 92123 • Phone (858) 576-1000 • Fax (858) 576-9600

Fault	Distance miles (kilometers) ^{1,2}	Moment Magnitude ²
Rose Canyon	4.4 (7.1)	7.2
Newport-Inglewood (Offshore)	17 (21)	7.1
Coronado Bank	18 (29)	7.6
Elsinore (Julian Segment)	30 (48)	7.1
Elsinore (Temecula Segment)	30 (49)	6.8
Notes: ¹ Blake (2001); ² Cao, et al. (2003)		

Table 1 – Principal Active Faults

- Within the Local Setting/Seismicity subsection of Section 3.8.2.2, discussion and quantification of ground acceleration is no longer applicable based on current building codes and industry practice. Discussion of ground acceleration may be removed from the CEQA document.
- In discussion of Table 3.8-3, it should be noted that earthquake magnitude as measured by earthquake moment differs from the Richter scale, particularly for earthquakes with moment magnitudes greater than 5.0.

We appreciate the opportunity to be of service on this project.

Sincerely, NINYO & MOORE

Ronald D. Hallum, PG, CEG Senior Geologist

NMM/RDH/GTF/gg

Attachment: References

Distribution: (1) Addressee



1/1/

Gregory T. Farrand, PG, CEG Principal Geologist

REFERENCES

- Blake, T.F., 2001, FRISKSP (Version 4.00) A Computer Program for the Probabilistic Estimation of Peak Acceleration and Uniform Hazard Spectra Using 3-D Faults as Earthquake Sources.
- Cao, T., Bryant, W. A., Rowshandel, B., Branum, D., and Willis, C. J., 2003, The Revised 2002 California Probabilistic Seismic Hazards Maps: California Geological Survey: dated June City of San Diego, 2008, Seismic Safety Study, Geologic Hazards and Faults.
- City of San Diego, 2008, Seismic Safety Study, Geologic Hazards and Faults, Grid 42, Scale 1:9,600.
- Kennedy, M.P., and Tan, S.S., 2008, Geologic Map of the San Diego 30'x 60' Quadrangle, California; California Geological Survey, Regional Geologic Map Series.
- Ninyo & Moore, 2012, Geotechnical Update, El Camino Real Bridge and Roadway Widening Project, San Diego, California: dated December 4.