



FINAL ENVIRONMENTAL IMPACT REPORT

Project No. 349988 SCH No. 2014041011

SUBJECT: MISSION TRAILS REGIONAL PARK MASTER PLAN UPDATE

APPLICANT: City of San Diego Planning Department

FINAL DOCUMENT: February 11, 2019:

In response to comments received during public review and City staff input subsequent to distribution of the Draft Program Environmental Impact Report (PEIR), minor revisions, clarifications and/or additions have been made to the document which do not change the conclusions of the Final PEIR regarding the project's potential environmental impacts and required mitigation. As defined in CEQA Section 15088.5, these revisions, clarifications or additions to the document – which are shown in strikeout/underline format – do not represent "significant new information" and therefore, recirculation of the Draft PEIR is not warranted. No new significant environmental impacts would occur from these modifications, and similarly, no substantial increase in the severity of environmental impacts would occur.

PROJECT DESCRIPTION:

The project includes the adoption and implementation of the Mission Trails Regional Park Master Plan Update (MPU), Natural Resources Management Plan (NRMP), and Community Plan Technical Amendments (collectively, the Plans) for the Mission Trails Regional Park (MTRP or Park). The Plans have been developed as an integrated set of management guidelines for the Park, with the MPU focusing on public access and recreation and the NRMP focusing on natural resources management. The Plans were prepared concurrently to coordinate the recommendations and management actions for the six (6) areas that comprise MTRP – Lake Murray, Cowles Mountain, Mission Gorge, Fortuna Mountain, East Elliott, and West Sycamore. The East Elliott and West Sycamore areas are the park expansion areas further described in the Plans and Draft Program Environmental Impact Report (PEIR) that would be incorporated into the official Park boundaries after certification of this PEIR and approval of the Plans.

The MPU provides updated recommendations to the existing 1985 Master Plan. The MPU recommendations range from broad overarching policy and management-related topics that affect the entire Park, to specific planned physical improvements within these areas. The MPU recommendations are focused on improving overall land/resource management, recreational trails safety and sustainability, improving recreational access, and eliminating conflicts between recreational uses and natural habitat.

The MPU identifies conceptual projects that may be implemented after adoption of the Plans. These are referred to as "subsequent projects" throughout the PEIR. Such projects recommended by the MPU include (but are not limited to) trail improvements, trailheads, picnic and shade areas, restrooms, parking lots, and interpretive overlooks. Subsequent projects identified in the MPU are

conceptual, including trail alignments. Subsequent projects also include recommendations for the proposed location of improved and additional parking areas. The MPU does not provide for any specific location or design for subsequent projects that may potentially be implemented. These subsequent projects would require further design and review as they are proposed.

The NRMP sets forth adaptive management actions to ensure long-term, viable populations of sensitive species and habitats within the Park. It also sets forth protocols (e.g., data collection methods, success criteria) to evaluate the effectiveness of these management actions. The NRMP fulfills a requirement identified in the City's Multiple Species Conservation Program (MSCP) Subarea Plan to set forth an adaptive management framework to protect sensitive biological resources at the Park. The NRMP also details minimization measures that would be required to be followed prior to implementation of other NRMP management actions—such as monitoring, weeding, and restoration.

Implementation requires City Council approval and adoption of the Plans and certification of the PEIR. The project also requires adoption of amendments to the Navajo, Tierrasanta, and East Elliott Community Plans, as well as to the Rancho Encantada Precise Plan. The amendments are required to update or correct maps and community plan language where the plans reference outdated information regarding the Park and the existing Master Plan. These amendments would ensure that the future facilities proposed under the Plans are consistent with the respective Community Plans and/or Precise Plan and that any policy recommendations with regard to the management of the Park are consistent with updated policies in the Plans or simply make reference to the Plans.

PROJECT LOCATION:

The project area is located near the center of metropolitan San Diego, 8 miles northeast of Downtown San Diego, midway between the Pacific Ocean and the Cleveland National Forest. The Park is almost entirely within the City; however, it is within or near several jurisdictions, including the Cities of La Mesa, Santee, and El Cajon to the east; the City of Poway to the north; and unincorporated San Diego County to the northeast. With the addition of the proposed expansion areas, the Park would be bisected by Marine Corps Air Station Miramar. The existing 5,830-acre Park is split into four areas: Lake Murray, Cowles Mountain, Mission Gorge, and Fortuna Mountain. The East Elliott and West Sycamore expansion areas would bring the Park's total area to approximately 9,780 acres.

ENVIRONMENTAL DETERMINATION:

The purpose of this document is to inform decisionmakers, agencies, and the public of the significant environmental effects that could result if the project is approved and implemented, identify potential mitigation to address the significant effects, and describe reasonable project alternatives.

This document has been prepared by the City of San Diego Planning Department and is based on the City's independent analysis and determinations made pursuant to Section 21082.1 of the California Environmental Quality Act (CEQA) and Section 128.0103(a) and (b) of the San Diego Municipal Code.

Based on the analysis conducted for the project described above, the City of San Diego has prepared the following PEIR in accordance with CEQA. The analysis conducted identified that the project would not result in significant and unavoidable impacts. All impacts analyzed in this PEIR were found to be less than significant.

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 environmental document. No response is necessary and the letters are incorporated herein.
- (X) Comments addressing the accuracy or completeness of the draft environmental document were received during the public input period. The letters and responses are incorporated herein.

Heidi Vonblum, Program Manager

Planning Department

<u>February 11 2019</u> Date of Final Report

Analyst: Myra Herrmann

PUBLIC REVIEW DISTRIBUTION:

The following individuals, organizations and agencies received a copy or notice of the Draft PEIR and were invited to comment on the sufficiency of the document in analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated (CEQA Guidelines Section 15204). Copies of the Draft PEIR and any technical appendices may be reviewed in the offices of the Planning Department or purchased for the cost of reproduction.

Federal Government

Federal Aviation Administration (1) Naval Facilities Southwest – Environmental Planning Division Naval Facilities (12) U.S. Environmental Protection Agency (19) U.S. Fish and Wildlife Service (23) MCAS Miramar Air Station (24) U.S. Army Corps of Engineers (26) U.S. Army Corps of Engineers – FUDS Project Manager, Lloyd Goddard

State of California

CALTRANS District 11 (31)
Department of Fish and Wildlife (32)
CAL Recycle (35)
Environmental Protection Agency (37A)
Department of Toxic Substance Control (39)
Office of Historic Preservation (41)
California Natural Resources Agency (43)
Regional Water Quality Control Board,
Region 9 (44)

State Clearinghouse (46A)
California Coastal Commission (47)
California Transportation Commission (51)
California Transportation Commission (51A)
California State Coastal Conservancy (54)
Native American Heritage Commission (56)
California Energy Commission (59)
California Department of Conservation (60)

County of San Diego

Vector Control (63)
Air Pollution Control District (65)
Planning and Development Services (68)
Parks and Recreation Department (69)
Water Authority (73)

Hazardous Materials Management Division (75) Department of Public Works (70) Department of Environmental Health – Land and Water Division (76)

City of San Diego

Council President Georgette Gomez, District 9 Council President Pro Tem Barbara Bry, District 1 Councilmember Jennifer Campbell, District 2 Councilmember Chris Ward, District 3 Councilmember Monica Montgomery, District 4 Councilmember Mark Kersey, District 5 Councilmember Chris Cate, District 6 Councilmember Scott Sherman, District 7 Councilmember Vivian Moreno, District 8

Mayor's Office (91) Stacey LoMedico Erik Caldwell

<u>Office of the City Attorney</u> Shannon Thomas, Deputy City Attorney

<u>Planning Department (Applicant)</u> Mike Hansen, Director Tom Tomlinson, Assistant Director

Alyssa Muto, Deputy Director Heidi Vonblum, Program Manager Planning Department (Applicant) - cont.

Betsy Miller, Project Manager Myra Herrmann, Senior Planner

Dan Monroe Kristy Forburger Kelley Stanco Angela Abeyta

Holly Smit-Kicklighter

Real Estate Assets Department Cybele Thompson, Director

Park and Recreation Department

Herman Parker, Director Andrew Field, Assistant Director Jeannette DeAngelis, Deputy Director Casey Smith, Deputy Director Steve Haupt Laura Ball Paul Kilburg

Keli Balo

Public Utilities Department

Matthew Vespi, Interim Director

John Helminski, Assistant Director Nicole McGinnis

<u>Development Services Department</u>

Gary Geiler, Deputy Director Anna McPherson

<u>Public Works Department</u>

James Nagelvoort, Director Carrie Purcell

Environmental Services Department

Mario Sierra, Director Lisa Wood

Transportation & Storm Water Department

Kris McFadden, Director Christine Rothman Andrew Kleis, Deputy Director Mark Stephens

Fire & Life Safety Department

Colin Stowell, Fire Chief Michelle Abella-Shon

Larry Trame, Assistant Fire Marshal

San Diego Police Department
David Nisleit, Police Chief
Mike Pridemore

City Libraries

Central Library, Government Documents

Scripps Miramar Branch Library (81FF)
Benjamin Branch Library (81D)

Tierrasanta Branch Library (81II)

San Carlos Branch Library (81DD)

City Advisory Committees and Boards

Airports Advisory Committee (MS 14) Wetlands Advisory Board

Historical Resources Board (87) Community Forestry Advisory Board

Other City Governments

Park & Recreation Board (89)

City of El Cajon (97)
City of La Mesa (100)
City of Santee (104)

Other City Governments - cont.

San Diego Association of Governments (108)

San Diego County Regional Airport

Authority (110)

Metropolitan Transit System (112/115)

San Diego Gas & Electric (114)

School Districts

Poway Unified School District (124)

San Diego Unified School District (125/132)

San Diego Community College District (133)

UCSD Library (134)

Community Groups, Associations, Boards, Committees and Councils

Mission Trails Regional Park CAC (341)

Navajo Community Planners Inc. (336)

San Carlos Area Council (338)

Scripps Ranch Community Planning Group

(437)

Miramar Ranch North Planning Committee

College Area Community Planning Board

(456)

Tierrasanta Community Council (462/464)

Other Agencies, Organizations and Individuals

Jennifer Campos, RECON (Consultant)

Mark Carpenter, KTU&A (Consultant)

Helix Water District Padre Water District

San Diego Chamber of Commerce (157)

San Diego River Park Foundation (163)

Sierra Club (165)

San Diego Canyonlands (165A)

San Diego Natural History Museum (166)

San Diego Audubon Society (167)

Jim Peugh (167A)

San Diego River Conservancy (168) Environmental Health Coalition (169)

California Native Plant Society (170)

San Diego Coastkeeper (173)

Ellen Bauder (175)

Citizens Coordinate for Century 3 (179) Endangered Habitats League (182/182A)

San Diego River Park Foundation (335)

San Diego River Coalition (337)

Frank Landis (387)

Beeler Canyon Conservancy (436)

Alliant University (438)

Scripps Ranch Civic Association (440)

Acquisitions Walter Library USIU (441)

Mission Trails Regional Park (465)

Bob Allen (460)

Dave Dilday (460A)

David Hogan, Chaparral Lands Conservancy

Van Collinsworth

Andrew Kean

Arnold Veldkamp, J.J.B. Land Company, L.P.

Livia Borak - Coast Law Group, LLC

Adam Kimmerly

Al Korobkin

San Diego Tracking Team (187) League of Women Voters (192)

Carmen Lucas (206)

South Coastal Information Center (210)

San Diego History Center (211)

San Diego Archaeological Center (212)

Save Our Heritage Organisation (214)

Ron Chrisman (215) Clint Linton (215B)

Frank Brown, Inter-Tribal Cultural

Resource Council (216)

Campo Band of Mission Indians (217)

San Diego County Archaeological Society

Inc. (218)

Kuumeyaay Cultural Heritage Preservation

(223)

Kuumeyaay Cultural Repatriation

Committee (225)

Native American Distribution (225A-S)

Barona Group of Capitan Grande Band of

Mission Indians (225A)

Campo Band of Mission Indians (225B)

Ewiiaapaayp Band of Mission Indians (225C)

Inaja Band of Mission Indians (225D)

Jamul Indian Village (225E)

La Posta Band of Mission Indians (225F)

Manzanita Band of Mission Indians (225G)

Sycuan Band of Mission Indians (225H)

Viejas Group of Capitan Grande Band of

Mission Indians (225I)

Mesa Grande Band of Mission Indians (225J)

San Pasqual Band of Mission Indians (225K)

Ipai Nation of Santa Ysabel (225L)

La Jolla Band of Mission Indians (225M)

Pala Band of Mission Indians (225N)

Other Agencies, Organizations and Individuals

Pauma Band of Mission Indians (2250) Pechanga Band of Mission Indians (225P) Rincon Band of Luiseno Indians (225Q) San Luis Rey Band of Luiseno Indians (225R) Los Coyotes Band of Mission Indians (225S)

Alan Smith Andy Barragh Anne M Barron Ben Nicholls Beth Simon

Ian & Bob Hartwig

Bill Winans Lois Day Bill Sefton Mohammad Ali Allyson Boyd Carol Cox Chuck Edgin Chris Hubbard Mollie Bigger Dom Deluca Maggie Holloway David Kotnik **David Sparks Doug Livingston**

Douglas Brown Ed Price Eric Leenerts Evan Sollberger **Everett Newman** Chris Hatch

Dorinda Bogart

Bobby Fitz Simmons

Frank Tirpak

Fred & Linda Kramer Gareth Morgan **Gardner Grady Greg Lambert** Johnnie Lyman Carolyn Barkow Jeff Guadinus Joe Morse **Aaron Garland** Jose Galaz Josh Higgins

Kay Stewart Keli Balo

Joe Satriano

Lee Campbell

Mohammad Karim

Kim Wilev Iane Yen

Kailash Mozumder Amber Wright David Aldon Libby Brydolf

Linda & Lyle Cocking

Tom Sommer Matt Merritt Minette Ozaki Michael McConnell Mark Schlocker Cliff Walker Mark Weidinger Carlos Orsco Nate Bondi **Patty Mooney** Phil Moses Philip Aman Philip Erdelsky Rich Julien **Rob Aaronson** Robin Keightley **Ron Graves** Renee Schlocker Roberto Gutierrez **Robert Hunt** Stephen Boland

Karol Koerner Luis Garaldon

Sean Durkin

Basil Iones Skip Shaputnic Andy George Steffen Thompson Stephen Goldfarb Tara Luansing-Aguiber

Tom Donnelly Kevin Wood Jonny Holt Elaine Valdez **Bill Simmons** Wayne Hay Ben Stone **Kevin Loomis** Mike Moore Kevin Walsh Bernie Parmer Dian Stum **Daniel Newton** Diana Johnson

Joanne Thompson John Bellora

Bird Friends of San Diego

California Invasive Plant Council (Cal-IPC):

Friends of Tierrasanta Canyons

San Diego Mountain Biking Association

Andrew Asaro James McAndrew Richard Quincey Sean Berry Yen Family Trust Norman Peterson

Selna & Mongini Investments

Ramsey L Najor CCC Construction Co Strand Family Trust

M&A Gabaee

Callahan Family Trust

Horning Family Revocable Trust

Ishihara Trust
Plumb Family Trust
Richard Green Trust
Donald Walker Trust
Stanley & Rita Zemer Trust

John Murphy Trust Jack & Jeannette Zarour East Elliot Land Co LLC Ingrid Fowler

Doris M Howser Max & Miriam Waisler Robert Hammond Jr Trust

Artemiza Pringle Coad Investments Pardee Homes

Ernst & Alice Kaminsky Family Trust Frances E Johnston Family Trust

Allan Family Trust

James M Andrews Family Trust

Alfred & Joyce Imhof Lawrence Maday

Schafer Surviving Spouse Trust Edwin Johnston 1979 Trust Felizardo & Belen Barcarse

Margaret Petitjean Keystone Trust Akiko Kashiwagi Ayoub Sesar

Norber Family Trust Martha Lind

Mongini Revocable Trust

Churchill Family Trust

Alice Kenniston Revocable Trust

Andrew Asaro Trust

Poway Unified School District

Midwest Television Inc.

Mitri Barghout
Dan Cashion
Marlin Burke
Chuck Malar
Richard Breisch
Boyd Conklin
Cheryl Martin
Jasmine Guffey
Caroline Harrod
Dustin Sharp
Mark Schulze
Frank Hass
Patty Mooney
Steve Blanchard

Stephen Houlahan Kim Wiley Liz Swain Herb Dallas Kirk Bennett Jay Coulter Pauline Kedward Adam Kimmerly

Eric Scherch

John Pilch
Koji Kasuyama
Rich Thesing
Mauricio Martinez
Angela Draper
Rob HingTgen
Dave Lasorte
John Carrvey
Tony Rolfe
Thomas Coad
Dustin Sharp
Linda Hassakis
Jason Showalter

Stuart Creed
David Cooksy
Diego Aldrete
Chuck Muell
Allison Harmon
Michael Coad
Brian Cox
Ryan Vallee
Paul Schlitt

Other Agencies, Organizations and Individuals Hamilton Biological Patty Mooney and Mark Schulz Allied Climbers of San Diego

J. Whalen Associates, Inc. Mari McEachern Beth Frice

Mission Trails Regional Park Master Plan Update PEIR Letters of Comment and Responses

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

A1	State Clearinghouse	RTC-2
A2	U.S. Fish and Wildlife Service and California Department of Fish and Wildlife	
А3	County of San Diego	RTC-42
A4	San Diego County Water Authority	RTC-49
A5	San Diego Gas and Electric	
B1	Hamilton Biological	RTC-53
B2	Endangered Habitats League (Johnson, Smith & Foy)	RTC-88
ВЗ	California Native Plant Society	RTC-108
В4	California Chaparral Institute/Center for Biological Diversity/Preserve	RTC-114
B5	San Diego Audubon Society	RTC-120
В6	Kwaaymii Laguna Band of Indians (Carmen Lucas)	RTC-122
В7	San Diego County Archaeological Society, Inc.	RTC-135
В8	Allied Climbers of San Diego	RTC-136
В9	Rincon Band	RTC-155
B10	Save our Heritage Organisation	RTC-156
C1	Andrew Asaro	RTC-157
C2	Dave Dilday	
C3	Beth Frice	RTC-163
C4	Stephen Goldfarb	RTC-164
C5	Diana Johnson	RTC-172
C6	J. Whalen Associates, Inc. (representing DeGrenier and Stephens)	RTC-173
C7	Mari McEachern	
C8	Tony Neel	RTC-178
C9	Jack Zarour	
C10	Patty Mooney and Mark Schulze	

Letter A1



STATE OF CALIFORNIA

GOVERNOR'S OFFICE of PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX

March 7, 2017

Myra Herrmann City of San Diego 1010 2nd Ave, Suite 1200, East Tower MS 413 San Diego, CA 92101

Subject: Mission Trails Regional Park Master Plan Update/Natural Resources Management Plan/Community Plan Technical Amendments SCH#: 2014041011

Dear Myra Herrmann:

A1-1

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on March 6, 2017, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

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

Sincerel

Scott-Morgan

Director, State Clearinghouse

A1-1 Comment noted.

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

Document Details Report State Clearinghouse Data Base SCH# 2014041011 Mission Trails Regional Park Master Plan Update/Natural Resources Management Plan/Community Project Title Lead Agency Plan Technical Amendments San Diego, City of Type EIR Draft EIR Description City Council Approval and adoption of the Mission Trails Regional Park Master Plan Update, NRMP and community plan technical amendments for the Mission Trails Regional Park. The plans have been developed as an integrated set of management guidelines for the park, with the MPU focusing on public access and recreation and the NRMP focusing on natural resources. The plans were prepared concurrently in order to coordinate the recommendations and management actions for the six areas that comprise MTRP - Lake Murray, Cowless Mountain, Mission Gorge, Fortuna Mountain, East Elliott, and West Sycamore. The East Elliott and West Sycamore areas are the park expansion areas further described in the plans and draft PEIR. Lead Agency Contact Name Myra Herrmann Agency City of San Diego Phone 619 446 5372 Fax email Address 1010 2nd Ave, Suite 1200, East Tower MS 413 City San Diego State CA Zip 92101 Project.Location County San Diego City San Diego, La Mesa, El Cajon Region Lat / Long 32° 48' 39.1236" N / 117° 3' 23.6874" W Mission Gorge Rd, Father Juniper Serra Rd, Santo Road, Jackson Drive, Mast Blvd Cross Streets Parcel No. Township Range Section Base SBB&M Proximity to: Highways I-8, 15, SR-125 Airports Gillespie Field/MCAS Miramar Railways Waterways San Diego River Schools Grossmont Community College Land Use Open water / Open-Space / Recreation, public land, public right-of-way Project Issues Air Quality; Archaeologic-Historic; Biological Resources; Dralnage/Absorption; Flood Plain/Flooding; Geologic/Seismic; Noise; Public Services; Recreation/Parks; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Wetland/Riparian; Wildlife; Landuse; Cumulative Effects; Other Issues; Aesthetic/Visual Reviewing Resources Agency; Department of Fish and Wildlife, Region 5; Cal Fire; Office of Historic Agencies Preservation; Department of Parks and Recreation; Department of Water Resources; Office of Emergency Services, California; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 11; Regional Water Quality Control Board, Region 9; Native American Heritage Commission; State Lands Commission Date Received 01/20/2017 Start of Review 01/20/2017 End of Review 03/06/2017

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Letter A1



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



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

In Reply Refer To: FWS/CDFW-13B0298-17TA0542

March 15, 2017 Sent by Email

Ms. Myra Herrmann City of San Diego Planning Department 1010 Second Avenue, MS 413 San Diego, California 92101 PlanningCEQA@sandiego.gov

Subject: Comments on the Draft Program Environmental Impact Report for the Mission Trails

Regional Park Master Plan Update/Natural Resources Management Plan/Community Plan Technical Amendments (Project No. 349988/SCH# 2014041011), City of San

Diego, California

Dear Ms. Herrmann:

A2-1 The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Wildlife (Department), collectively referred to as the Wildlife Agencies, have reviewed the Draft Program Environmental Impact Report (DPEIR), dated January 20, 2017, for the Mission Trails Regional Park (MTRP) Master Plan Update (MPU)/Natural Resources Management Plan (NRMP)/Community Plan Technical Amendments in the City of San Diego (City), California. The public review period for the DPEIR ended on March 8, 2017. The Wildlife Agencies appreciate the City granting a time extension until March 15, 2017, to provide comments on the DPEIR. The comments and recommendations provided herein (Enclosure 1) are based on the information provided in the DPEIR, our knowledge of sensitive and declining vegetation communities in the region, and our participation in the Multiple Species Conservation Program (MSCP) and the City's MSCP Subarea Plan (SAP).

The primary concern and mandate of the Service is the protection of fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds, anadromous fish, and threatened and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Federal Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 et seq.), including habitat conservation plans (HCP) developed under section 10(a)(f) of the Act. The Department is a Trustee Agency with jurisdiction over natural resources affected by the project [California Environmental Quality Act (CEQA) Guidelines §15386] and is a Responsible Agency under CEQA Guidelines Section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code §2050 et seq.) and Fish and Game Code Section 1600 et seq. The Department also administers the Natural Community Conservation Planning Program (NCCP) program, a California regional habitat conservation planning program. The City participates in the NCCP and the Service's HCP programs by implementing its MSCP SAP.

A2-1 Comment noted.

Ms. Myra Herrmann (FWS/CDFW-13B0298-17TA0542)

7

MTRP is located near the center of metropolitan San Diego, 8 miles northeast of downtown San Diego, midway between the Pacific Ocean and the Cleveland National Forest. MTRP is almost entirely within the City; however, it is within or near several jurisdictions, including the Cities of La Mesa, Santee, and El Cajon to the east; the City of Poway to the north, and unincorporated San Diego County to the northeast. MTRP is divided into four areas (i.e., Lake Murray, Cowles Mountain, Mission Gorge, Fortuna Mountain) based on significant features of a particular area. The Plans include two expansion areas (i.e., East Elliot and West Sycamore) for inclusion into the boundaries of MTRP. Presently, MTRP is approximately 5,830 acres and will be approximately 9,780 acres with the expansion areas. With the addition of the proposed expansion areas, the MTRP would be bisected by Marine Corps Air Station Miramar.

The overarching goal of the MSCP is to maintain and enhance biological diversity in the region and conserve viable populations of sensitive species. Important biological resources in the MTRP include coastal sage scrub, riparian scrub, and vernal pools. Significant populations of species covered under the City's SAP that occur in the MTRP include willowy monardella [Monardella viminea (M. linoides subsp. v.)]. San Diego thornmint (Acamhomintha ilictifolia), Orcutt's brodiaca (Brodiaca orcuttii), San Diego ambrosia (Ambrosia pumila), San Diego fairy shrimp (Branchinecta sandiegonensis), least Bell's vireo (Vireo bellii pusillus), and coastal California gnateatcher (Polioptila californica californica). The MTRP includes mitigation areas and lands in the City's SAP Multi-Habitat Planning Area (MHPA), or preserve, used to fulfill MSCP conservation obligations.

The "Project" comprises the implementation of the MPU and NRMP (collectively, the Plans), which would serve as policy documents that establish the planning framework for the future design, implementation, and management of MTRP. The goals and policies covered by the MPU would provide specific guidance on critical MTRP implementation issues, so that all aspects of the development and operation would be consistent with the agreed upon MTRP concept. The intent of the MPU is to incorporate the resource protection and management requirements of the City's SAP into an NRMP for MTRP and coordinate the recommendations and management actions between the MPU and NRMP. The MPU would provide master planning for the management of resources and the development of recreational opportunities, including lands acquired for preservation in East Elliot, while continuing to provide for potential private development per the current East Elliot Community Plan and City's SAP guidelines. The NRMP intends to establish adaptive management actions to ensure long-term, viable populations of sensitive species and habitats within MTRP. It also establishes protocols (e.g., data collection methods, success criteria) to evaluate the effectiveness of these management actions. The NRMP would fulfill a requirement identified in the City's SAP to implement an adaptive management framework in order to protect sensitive biological resources within MTRP. The NRMP also details minimization measures that would be required to be followed prior to implementation of any future project in MTRP.

A2-2 As the Wildlife Agencies emphasized at the onset of our involvement with the Plans, MTRP is a core resource under the City's SAP, containing many sensitive biological resources. Maintaining the biological resources and habitat connectivity within this area is essential to ensure the continued coverage for plants and animals provided under the City's SAP. MTRP is an important regional resource that attracts visitors county-wide. Management and monitoring of the usage patterns are essential to the long-term function of the preserve for biological resources and compatible public access. As we have previously expressed, a key element of the Plans should include goals and measurable objectives using "SMART" criteria (i.e., Specific, Measurable, Achievable, Results-

A2-2 The City acknowledges the importance of the Park as a core resource under the City's Subarea Plan. The Natural Resource Management Plan (NRMP) provides area specific management directives (ASMDs) for the protection of natural resources at the Park. Two of the specific objectives of the NRMP (Introduction, page 1-1) are to "develop specific management actions (e.g., ASMDs) within an adaptive management framework to address the identified threats and ensure long-term, viable populations of these species within MTRP", and "Develop protocols (e.g., data collection methods, success criteria) to evaluate adaptive management techniques and projects proposed in this plan." The City implements an on-going Multiple Species Conservation Program (MSCP) required monitoring program, the results of which are used to inform the City's on-going adaptive management program efforts, particularly related to San Diego thornmint (MSCP monitoring), variegated dudleya (MSCP monitoring), and weed treatment at both the thornmint and ambrosia sites (management specific monitoring). The results of these monitoring efforts are the basis for the management strategies included in the appropriate sections of the NRMP for thornmint (MSCP monitoring, focused weed treatment following Conservation Biology Institute [CBI] protocol, SANDAG-funded seed bulking), dudleya (MSCP monitoring), and ambrosia (MSCP monitoring, focused weed treatment). Furthermore, these efforts are tracked and included in the Management and Monitoring Reports prepared by Park & Recreation Department Open Space staff on the status of MSCP compliance efforts on City-owned Multi-Habitat Planning Area (MHPA) that is submitted to the Wildlife Agencies as part of the MSCP Annual Report.

Ms. Myra Herrmann (FWS/CDFW- 13B0298-17TA0542)

oriented, and Time-fixed) to monitor usage type/patterns. The results of this monitoring should be incorporated into adaptive management strategies for species contained in the NRMP.

A2-3

The Wildlife Agencies provided comment letters on May 24, 2013, and August 1, 2013, that addressed concerns that we had with the preliminary drafts of the Plans. We also provided separate comment letters on April 1, 2014, that provided revisions and management measures for incorporation into the draft versions of the Plans and recommendations for new trail proposals and realignments of the proposed trails network. In addition, prior to receiving the DPEIR the Wildlife Agencies submitted a letter to the City's Planning Department that specifically identified our concerns with the MPU and some trail alignments proposed within portions of East Elliot (FWS/CDFW-SDG-13BO298-17TA0221, dated January 20, 2017). We have attached a copy of this letter (Enclosure 2) in response to the DPEIR and restate our primary concerns from that letter herein.

Throughout our discussions on the proposed trail plan for MTRP, our primary goal has been to ensure that some portions of this large conserved block of habitat, though serving as a regional park, will maintain areas insulated from human access and related sources of disturbances (e.g., hiking, biking). This is important to ensure protected lands support more secretive aspects of larger wildlife species' life history requirements, such as deer fawning areas, bobcat dens, etc. This position is supported by the City of San Diego, Mission Trails Regional Park Open Space Mammal Monitoring, and Habitat Assessment Project, Comprehensive Final Report (Western Tracking Institute 2010; Habitat Assessment) that identified several "safe harbor zones" for wildlife that "must be aggressively protected."

A2-4 We have provided input and written comments on the preliminary trails design in an effort to refine the trails design, including addressing unauthorized trail construction/use in portions of MTRP, and have worked in good faith to agree to trails, including single track trails, loop trails, and 5.62 miles of new trails throughout the park. The Project includes trails extending into the portion of Oak Canyon on the western side of East Elliot. We previously indicated in a September 11, 2015, email and in meetings that, based on the available information, the Wildlife Agencies do not support this trail due to the sensitivity of wildlife resources in the area.

Specifically, the Habitat Assessment identified the four undercrossings of State Route 52, including the Oak Canyon Bridge, as the only possible safe egress/ingress avenues for terrestrial wildlife at MTRP. The Habitat Assessment also identified areas in proximity to the Oak Canyon Bridge as a safe-harbor zone that provides refuge including breeding areas for all species, concluding that safe-harbor areas must be aggressively protected. The Habitat Assessment emphasizes "Protecting and enhancing safe harbor areas, wildlife movement routes, and movement corridors within MTRP will be vital to its long term success as a wildlife core area within the greater Multiple Species Conservation Program of the City of San Diego."

In addition, the Mission Trails Regional Park Oak Canyon Wildlife Assessment Related to a Proposed Trail Realignment Summary of Findings (Martin 2016; Wildlife Assessment) identified the areas northeast and northwest of the State Route 52 bridge over Oak Canyon as deer hotspots and the floor of the canyon north of the bridge, where there are existing unauthorized trails, as a foraging area (night) and a movement corridor between sensitive habitat areas located northeast and northwest of the bridge. The report acknowledges that this area supports many species and is an important core area for wildlife, in particular providing year round use by deer, including within the canyon bottom.

A2-3 Comment noted. The City has considered the Wildlife Agency concerns and input throughout the Master Plan Update (MPU) and NRMP planning process. Responses to comments made by the Wildlife Agencies in their letter dated January 20, 2017, and restated in their letter dated March 15, 2017 submitted during public review of the DEIR are included below (Response to

Comments A2-4 through A2-7).

RESPONSE

A2-4 The City acknowledges that the Wildlife Agencies do not support a trail through Oak Canyon, including the portion of the trail that would traverse under State Route (SR) -52 at Oak Canyon. As such, following public review of the Draft Program Environmental Impact Report (PEIR), the City coordinated with the Wildlife Agencies and stakeholder user groups to identify two revised trail alignments in the East Elliott area of Mission Trails Regional Park (MTRP or Park), as further described below. Figures and applicable text within the MPU, NRMP and Draft EIR have been revised accordingly to reflect these changes.

The first alignment identified in the Draft MPU and Draft PEIR for Oak Canyon was comprised of a combination of existing (1.23-miles) and proposed (2.09 miles) trails to create a 3.33-mile Hike/Bike trail from the SR-52 overpass, within the canyon along the western boundary of MTRP connecting at the north end to the utility access road along the ridgeline. The revised alignment incorporated into the Final MPU and Final PEIR, has been relocated outside of the bottom of Oak Canyon and positioned adjacent to the ridgeline utility road. This newly revised alignment includes a combination of existing (0.62 mile) and proposed (1.60 miles) trails to create a 2.22-mile Hike/Bike trail.

The second alignment identified in the Draft MPU and Draft PEIR connected the Mast Boulevard parking and staging area, through Spring Canyon to the Boulders area east of the existing Sycamore Landfill and included a proposed 2.13 miles of Multi- use trail from the utility access road in Spring Canyon eastward, traversing

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A2-4 (cont.)

the terrain between the existing landfill and SR-52. While this area is a wildlife corridor, it is already disrupted by the existing Sycamore Landfill access road that generally runs north to south.

Bounded by the landfill to the north, and SR-52 to the south, this area functions as a wildlife corridor as noted in the Draft PEIR, as well as in prior environmental documentation for the landfill expansion and the extension of SR-52. The revised trail alignment relocates a portion of trail that extended around areas identified for mitigation for the expansion of the landfill, creating a more direct connection parallel, but outside of the SR-52 right of way, and reduces not only the bisecting of the wildlife corridor, but also reduces the length of the proposed trail by over 0.5 mile, to 1.50 miles. Overall, the two revised alignments reduced the proposed trail length in the East Elliott area by 16%, from 7.13-miles to 5.99-miles.

The importance of the Oak Canyon area and the SR-52 under crossings for wildlife is acknowledged in Section 5.5.2.4 of the Draft PEIR. This section identifies the seven SR-52 crossings that currently exist, discloses that the Oak Canyon Bridge undercrossing and the Spring Canyon Bridge undercrossing are the only two viable movement corridors for large mammals, and states that the SR-52 wildlife tunnel and Mast Boulevard culvert undercrossing require enhancement or maintenance. Potential impacts related to migratory wildlife and wildlife corridors/crossings resulting from the project are further discussed in Section 5.5.4 of the Draft PEIR, Issue 2. As detailed in this section, potential impacts related to migratory wildlife were identified as significant. The Mitigation Framework Section 5.5.6 concludes that for migratory wildlife, mitigation measures (MM-BIO-2 and MM-LU-1) would reduce potentially significant impacts to below a level of significance.

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A2-4 (cont.)

More specifically related to the Oak Canyon crossing at SR-52, in developing the MPU recommendations for the East Elliott area, the City recognized the importance of this crossing and incorporated specific recommendations to enhance and protect the viability of wildlife crossings as detailed in the MPU, Section 5.6.1. As such, the MPU includes multiple facility and recreation recommendations to minimize adverse impacts to the Oak Canyon wildlife crossing.

Furthermore, some of these recommendations include construction of new trail alignments through Oak Canyon; however, taken together, the recommendations aim to reduce the number of unauthorized trails that trespass onto Marine Corps Air Station (MCAS) Miramar, and replace existing Oak Canyon trail alignments with new trail alignments that are more sensitive to the existing biological resources present in the area. With implementation of the trail closures and restoration described in Section 5.6.5 Recreation Recommendations EE-R1, EE-R3, EE-R5, as well as improvements detailed in EE-F5, the proposed Oak Canyon trails (EE-R2, EE-R4) would be located within a biologically superior location and would improve conditions in comparison to the existing conditions. For example, the new alignment creates a minimum 100-foot buffer between recreational use and wetlands, which will further limit the impacts to wildlife use in the riparian corridor, such as nesting bird species. The NRMP also includes a discussion of Wildlife Corridors and management recommendations for SR-52 crossings.

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The report concludes that the Oak Canyon trail would avoid the most sensitive wildlife habitat zones and, if managed well, will help support a wide diversity of species. Furthermore, the Final Environmental Impact Statement for the construction of this segment of SR-52 cited the "heavy use" of Oak Canyon by mule deer, and included as mitigation for impacts to wildlife corridors the construction of high bridges at Oak Canyon and Spring Canyon to permit the continued passage of wildlife (California Department of Transportation 1989).

We agree that the area is an important core area. However, due to the adjacency to protected land on Marine Corps Air Station Miramar, documented very high levels of use by deer and other wildlife, and expectation that this area and the adjoining canyons will support deer fawning, we disagree that a trail through this area sufficiently protects sensitive biological resources in Oak Canyon. Therefore, we do not support a trail through this area nor under SR-52 at Oak Canyon.

- A2-5 In addition, the Service and the State of California worked together to purchase lands within East Elliot with grants provided under Section 6 of the Act. The Preferred Alternative includes trails on or near property that was acquired with Section 6 grants and land that was used by the City to leverage the grants in the East Elliot area. The intent of these Section 6 land acquisitions was to protect habitat supporting MSCP covered species. The trail through Section 6 parcels in Oak Canyon and along the southern portion of East Elliot across Spring Canyon is contrary to the original grant purposes.
- A2-6 In our review of the DPEIR's Project alternatives, we believe the Reduced Project Alternative is more aligned with the conservation objectives and strategies for protecting biological resources within MTRP. Finally, in considering the Plans, as well as the information provided in the DPEIR, we found many of the recommendations provided in our prior comment letters were not thoroughly addressed or included in the Plans. We request that the City revisit our prior comment letters and carefully consider them in the process of developing a comprehensive MPU and NRMP, along with evaluating them in the context of proposed projects and alternatives.
- A2-7 We request a meeting with the City to review our comments and ensure the Plans comply with the City's SAP before finalizing the Plans and issuing the final PEIR. If you have questions or comments regarding this letter please contact Paul Schlitt of the Department at 858-637-5510 or Patrick Gower of the Service at 760-431-9440.

Sincerely,

Digitally signed by DAVID ZOUTENDYK Date: 2017.03.15 14:27:15 -07'00'

Karen A. Goebel Assistant Field Supervisor U.S. Fish and Wildlife Service

Enclosures

Gail K. Sevrens

Environmental Program Manager California Department of Fish and Wildlife

This comment does not address the adequacy or accuracy of the A2-5 environmental document; however, the City offers the following in response to the comment regarding Section 6 grants. Staff has reviewed the Section 6 Subgrant agreements between the City and the State of California Department of Fish and Wildlife, Wildlife Conservation Board. The City has also reviewed project statements prepared by the City, the United States Fish and Wildlife Service, and the California Department of Fish and Wildlife. Those documents suggest that recreational uses such as trails are consistent so long as they are compatible with wildlife habitat preservation. Because the NRMP and MPU propose trails to be maintained in a responsible and sensitive way according to the City of San Diego MSCP Subarea Plan and other regulations, the proposed trails on parcels that utilized these grant funds are a compatible use and as such, are not contrary to the original grant purposes.

RESPONSE

Comment noted. The City has reviewed and considered the A2-6 referenced letters provided by the Wildlife Agencies in preparing the Plans. The Reduced Project Alternative was developed to align with the recommendations made by the Wildlife Agencies. As stated in Draft PEIR Section 10.3.3, the Reduced Project Alternative would slightly reduce the severity of potential impacts associated with land use, visual effects, trail, greenhouse gas emissions, biological resources, historical resources, hydrology and water quality, geology and soils, paleontological resources, public services, and public utilities. However, it would not fully meet the project objectives as it would remove a key point of connectivity (Sycamore Canyon) and the trail alignment that would extend along the western boundary of the Park, reducing trail access for Park patrons, and as such would not meet the objective to "provide new or alternative routes to improve the recreational connectivity while protecting the Park's natural and cultural resources". Furthermore, this alternative would likely result in less usable areas of the Park, which would not fully meet the objective of providing new or alternative routes to improve the recreational connectivity of the region.

A2-7 Comment noted.

Ms. Myra Herrmann (FWS/CDFW-13B0298-17TA0542) 5 LITERATURE CITED California Department of Transportation. 1989, Route Location. Adoption, and Construction of State Route 52 Between Santo Road in the City of San Diego and State Route 67 in the City of Santee, State of California, Final Environmental Impact Statement/Final Section 4(f) Evaluation, SCH# 84040407, June 28, 1989. Martin, C. 2016. Mission Trails Regional Park Oak Canyon Wildlife Assessment Related to a Proposed Trails Realignment Summary of Findings. Prepared for the City of San Diego. 15 pp Western Tracking Institute, 2010. City of San Diego, Mission Trails Regional Park Open Space Mammal Monitoring and Habitat Assessment Project Comprehensive Final Report. Prepared for the City of San Diego Parks and Recreation. 48pp THIS PAGE INTENTIONALLY LEFT BLANK

Enclosure 1

Comments on the Draft Program Environmental Impact Report for Mission Trails Regional Park Master Plan Update/Natural Resources Management Plan/Community Plan Technical Amendments, San Diego County, CA

Comments on the adequacy of the environmental analysis for the DPEIR

- A2-8

 1. Pages ES-4 and 10-2, No Project Alternative The DPEIR states, "The No Project Alternative would not provide updated management recommendations that would preserve sensitive biological resources with the Park, and unauthorized use of existing trails within the Park would continue." We are concerned with the statement that "unauthorized use of existing trails within the Park would continue." Enforcement of unauthorized activities with the City MHPA is required per the MSCP Implementing Agreement (e.g., Section 9.15, 9.19, 10.3, and 10.6). Additionally, management directives in the City's Master Preserve Management Plan prioritize installing and maintaining trail fences or other barriers at strategic locations when protection of sensitive resources is needed and relocating trails when necessary to avoid and protect endangered or sensitive plant species (including MSCP cover species), key wildlife breeding habitats, and archaeology sites with surface artifacts. Regardless of the approval and/or denial of the proposed Project, the City is obligated to protect and implement management/monitoring actions to ensure that MSCP covered species are adequately protected.
- A2-9
 2. Page ES-5, Reduced Project Alternative According to the Reduced Project Alternative discussion, "Implementation of the Reduced Project Alternative would not avoid any of the identified significant and mitigable impacts of the Project." We are unclear as to the significant and mitigatable impacts the statement is referring to and the basis to support this conclusion, as this appears inconsistent with Section 10.3.2.1, which states that the Reduced Project Alternative would "reduce impacts associated with land use, visual effects, air quality, greenhouse gases, biological resources, historical resources, human health/public safety/hazardous materials, hydrology and water quality, geology and soils, paleontological resources, public services, and public utilities." We believe a reduction in the amount of trails through environmentally sensitive lands would likely result in reducing direct and indirect impacts to habitats and associated species. For example, the Reduced Project Alternative, which eliminates a trail through Oak Canyon, could reduce direct impacts to existing wildlife use and movement patterns in this area.
- A2-10

 3. Page 1-5, 1.2.2 Program-Level Impact Analysis Given the programmatic nature of the environmental document, the Department acknowledges that the Lead Agency is not obligated to fully analyze subsequent activities for which insufficient data exists. However, Findings of Significance should only be made when those Findings are supported by substantial evidence in the record (CEQA § 15091(b)). For those aspects of the Proposed Project that have not been fully studied, Findings of Significance should be set aside.
- A2-11
 4. Page 2-9, 2.2.1.4 Fortuna Mountain The discussion states "Uses within this area include SDCWA facilities and pipelines and multiple San Diego Gas & Electric (SDG&E) utility corridors (Figure 2-7)." In reviewing Figure 2-7, only staging areas, parking areas, and

- A2-8 The City acknowledges its obligations under the MSCP Implementing Agreement to maintain barriers and prevent entry into areas with sensitive biological resources. These efforts include enforcement on City fee-owned environmentally sensitive areas, posting of signs prohibiting public access to areas that are closed or under habitat restoration, and erecting informational barricades where necessary to reduce and eliminate unauthorized trail use/access outside of the Park boundaries. Under the No Project Alternative, these efforts by City Park Ranger staff would continue without the benefit of the MPU policies and recommendations, and resource management recommendations contained in the NRMP. As such, Sections 10.2.1, 10.2.2.2, 10.3.1 and 10.3.2.1 of the Final PEIR have been revised to acknowledge the City's continued enforcement of trail closures on City fee-owned property.
- A2-9 The City agrees that the Reduced Project Alternative would reduce impacts to habitats and associated species as stated in the comment; however, it would not completely avoid many of the significant impacts of the project. This is consistent with information stated in the Draft PEIR, in both the Executive Summary (page ES-5) and the Alternatives Chapter (Section 10.3.2.1), identifying slightly reduced impacts associated with land use, visual effects, air quality, greenhouse gas emissions, biological resources, historical resources, hydrology and water quality, geology and soils, paleontological resources, public services, and public utilities resulting from implementation of the Reduced Project Alternative, and would be subject to the same mitigation measures identified in the Draft PEIR. Furthermore, under the Reduced Project Alternative, although the NRMP would still be adopted and the MPU would still contain updated recommendations necessary to provide a structure for ongoing land and resource management and establish a framework for identifying unsafe or unsuitable sections of recreational trails, this alternative would not meet all the objectives to the same degree as the Project, as it would provide fewer trails and enhanced recreational opportunities, which are better met by the Project, striking a balance between resource conservation and enhanced recreational amenities for Park users

RESPONSE

LETTER

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Enclosure Page 2

trailhead are depicted. Please identify the figure that depicts the locations of pipelines and utility corridors. Additionally, please provide a discussion on efforts that have been made to date to coordinate with respective public utilities to address sensitive species issues during access road/facility maintenance and steps taken to close and restore redundant utility access roads.

- A2-12 5. Page 2-12, 2.2.15 East Elliot The discussion states, "Recreational use within the area has been occurring for a number of years on both unpaved utility roads and unauthorized user-created trails (22.5 miles)," The City should establish a timeline for when habitat impacts from these unauthorized trails will be restored. Additionally, please include in the final PEIR a thorough discussion of enforcement measures that the City has taken to date and will take in the future to control unauthorized trial construction within MTRP.
- A2-13
 6. Page 3-6, 3:2.2 Master Plan Update Recommendation The discussion states, "Some closures are not recommended until a new safer and more sustainable trail is constructed."

 Based on this guidance, it is unclear whether the City intends to apply this directive to unauthorized trails. Due to the potential impacts to sensitive resources and user safety, we highly recommend those trails be immediately cordoned off and restoration efforts implemented (regardless of whether the PEIR is approved by the decision-maker). The final PEIR should include a discussion that addresses this concern and the planning process going forward to restore impacts to existing biological resources.
- A2-14 7. Page 3-8, 3.2.2.1 Park Wide Policies The final PEIR should include what "other uses" are envisioned as referenced under general recommendation #1.
- A2-15
 8. Page 3-8, b. Planning Recommendations We were unable to locate a specific discussion in the DPEIR on whether any consideration was given to incorporating the management directives provided in the City of San Diego Master Preserve Management Plan (March 2008). For example, the Master Preserve Management Plan includes a management directive (Priority 1) that states, "Directives that protect the resources in the MHPA, including management actions that are necessary to ensure that MSCP covered species are adequately protected. These actions should be performed as soon as conditions require based on routine patrols." We recommend the final PEIR include all relevant management directives that are identified in the aforementioned document.
- A2-16 9. Page 3-8, b. Planning Recommendations Recommendation #2 should be revised in the final PEIR to include the obligation of conditionally compatible designs as defined by the City's SAP.
- A2-17 10. Page 3-9, b. Planning Recommendations Item #18 Planning recommendation #18 states "Support the implementation of the City of San Diego's San Diego River Park Master Plan within the boundaries of MTRP." The Department previously expressed concerns in our Supplemental Preliminary Comments on the Draft MTRP MPU and draft NRMP (dated, April 1, 2014) concerning the adequacy of the San Diego River Park Master Plan (SDRPMP) regarding the following issues: (1) City's lack of a completing a Natural Resource Management Plan for the San Diego River; (2) the absence of wetland buffer language with the SDRPMP (i.e., minimum 100-feet wide buffer, measured from the

A2-12 Comment noted. Not all trails within the East Elliott area are on public lands, and therefore, are not managed or monitored by City Park Ranger staff. Unauthorized trails on City fee-owned lands are activity managed by Park Ranger staff and closed to allow the habitat to reestablish itself. This also includes posting of signs and physical barriers which preclude access to these areas to ensure success of the unauthorized user created trail closure process. Additionally, Park & Recreation Department staff has indicated that trail work is generally completed during the rainy season, taking advantage of the wet soil for a longer-lasting trail. However, this often results in longer revegetation efforts for closed trails, sometimes up to a year later, especially if trying to build one trail before closing another, which can delay installation of plants and seeding during the summer. As a result, this oftentimes means waiting until the following rainy season to begin the process over again.

Actions taken by the City to comply with its obligations under the MSCP Subarea Plan are provided in MSCP Annual Reports for all City-owned MHPA.

- A2-13 See Response to Comment A2-8.
- A2-14 General Recommendation 1 of the Park-wide Policies has been revised in both the MPU and Final Environmental Impact Report (FEIR) to remove the reference to "other uses" which was a carryover from a prior version of the MPU.
- A2-15 The City of San Diego Master Preserve Management Plan is an internal document used by staff which reiterates the recommendations and management directives already contained in the City's adopted MSCP Subarea Plan and does not need to be referenced in the PEIR. Furthermore, the NRMP, once adopted, will supersede the Master Preserve Management Plan for the MTRP.

suggested. The City is obligated to comply with the MSCP Subarea Plan and does so through the project design and review process. As stated throughout the Draft PEIR and associated Mitigation Framework, all subsequent projects will require review for compliance with the MPU, NRMP, the MSCP Subarea Plan and the City's Land Development Code (LDC).

A2-16 Planning Recommendation #2 does not require revision as

A2-17 Comment noted. This comment raises issues with a previously approved master plan, which includes a portion of the current project area. Planning Recommendation #18 is included in the MPU to demonstrate support for implementation of the San Diego River Park Master Plan (SDRPMP) recommendations within the Park boundaries.

As with the MTRP MPU, future projects within the SDRPMP boundaries will also require subsequent project-level consistency review in accordance with that PEIR and the City's LDC, and will be required to demonstrate compliance with all applicable regulations and standards.

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Enclosure Page 3

outside edge of the riparian habitat); (3) a need to address redundant trails proposed along both sides of the river; and (4) lack of consistency findings for the SDRPMP to the City's MSCP SAP. We do not consider the responses that we received from the City at the time the SDRPMP was adopted to have adequately addressed our concerns on those issues expressed above; consequently, we do not believe it is appropriate to carry forward the standards prescribed in the SDRPMP or consider the environmental goals outlined in the SDRPMP as being consistent with the objectives of this Project.

- A2-18

 11. Page 3-10, Management Recommendation #2 We are unable to locate whether any consideration will be given to repairing damage to the existing utility roads and co-locating trails within those alignments. The City has previously cited that certain utility roads cannot be used jointly as trails and instead proposed new alignments within undisturbed habitats.

 According to the Trail and Park Planning and Development Directive outlined in City of San Diego Master Preserve Management Plan (March 2008), one of the MSCP directives includes "follow existing pathways or access roads as much as possible rather than entering habitat or wildlife movement areas...." Given that this section identifies a variety of management recommendations, we believe these MSCP directives should be included in the discussion in conjunction with future trail proposals.
- A2-19 12. Page 3-10. Management Recommendation #6 The Wildlife Agencies request to be involved with any future discussions with stakeholders in order to express our concerns that may conflict with desires of various user groups.
- A2-20
 13. Page 3-16, g. Recreation Recommendation #14) According to the proposed trail buildout (depicted in Figures 3-3 and 3-9), three trail alignments would extend onto lands that are partially owned by the Department (i.e., Goodan Ranch Sycamore Canyon Preserve as administrated via a joint powers authority agreement). Please identify the recreation recommendation that is intended to address obligations for coordinating with local or state land managers, including addressing any compatibility issues with trail alignments that extend from West Sycamore into Goodan Ranch Sycamore Canyon Preserve. Figure 3-9 depicts existing and new multi-use trails terminating at the eastern boundary of West Sycamore; however, no corresponding discussion was included on proposed connection points into Goodan Ranch Sycamore Canyon Preserve. Along with evaluating the environmental implications within the Land Use analysis, the potential threats to biological resources from trail connections and potential increase of recreational use stressors on preserve lands should be evaluated in the PEIR's biological resources analysis.
- A2-21

 14. Page 3-18, b. Cowles Mountain Portions of the interior portions of Cowles Mountain have previously been identified to support wildlife safe harbor zones (e.g., hobeat) as well as deer travel routes that start north of Mission Gorge Road. We recommend that the discussion in the final PEIR be amended to include these significant wildlife areas, along with avoidance and minimization measures that will be implemented in the future.
- A2-22 15. Page 3-24, e. East Elliot The term "unauthorized user-created trails" is discussed on page 2-12, whereas that term is not expressly mentioned in the East Elliot discussion. For purposes of consistency and disclosure, we recommend quantifying the unauthorized trail

- A2-18 Comment noted. Additional reference to the MSCP Subarea Plan and its directives is not necessary in this section. The Draft PEIR includes an evaluation of project consistency with the MSCP Subarea Plan in Section 5.1 Land Use. In addition, as future projects implemented in accordance with the Plans are designed and submitted for review, they will be evaluated for consistency with the MSCP Subarea Plan, as well as the NRMP and the City's Biology Guidelines.
- A2-19 This comment does not address the adequacy or accuracy of the Draft PEIR; however, the Citizens Advisory Committee and Task Force meetings are open to the public. Agendas are posted on the MTRP website at http://www.mtrp.org/cac.
- A2-20 The referenced trails which are partially owned by CDFW already exist, with one being closed, restored, and realigned. The realigned trail would terminate at the same location as the existing trail, at the eastern boundary, connecting to the County trail within Goodan Ranch. The City has coordinated with the County to ensure these trail connections remain as is. Figure 3-9 references the West Sycamore Recommendation R4, which states, "Collaborate with the County of San Diego to construct a new section of multi-use trail from West Sycamore down into the Goodan Ranch Sycamore Canyon Preserve." The City does not anticipate an increase in trail use in this area since these trail connections already exist. Section 5.5.4 of the Draft PEIR addresses potential adverse impacts to biological resources from proposed MPU recommendations, including an increase in trail users and new trails. In this section under Issue 1, the Draft PEIR discusses potential direct and indirect impacts to wildlife species. Mitigation measures BIO-1 through BIO-3 and LU-1 are identified in the Draft PEIR to reduce potential impacts to below a level of significance.

LETTER RESPONSE A2-21 The referenced discussion under Cowles Mountain has been amended to include the information provided by the commenter. Section 5.5 of the Draft PEIR discusses migratory wildlife (Issue 2) and identifies potential impacts that would be reduced to below a level of significance with implementation of mitigation measures BIO-2 and LU-1. A2-22 The term "unauthorized user-created trails" is mentioned on both page 2-12 of the Draft PEIR and in the East Elliott discussion on page 3-24 (see first sentence of third paragraph). The Draft PEIR adequately discloses the presence of unauthorized user trails. The focus of the analysis in the Draft PEIR is on describing the environmental impacts of the project, not the environmental impacts associated with the existing conditions. No change has been made as suggested. THIS PAGE INTENTIONALLY LEFT BLANK

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construction and the associated impacts that have occurred to date on environmentally sensitive lands within MTRP.

- A2-23 16. Page 4-1, Overview of Master Plan Update and History of Project Changes According to the summary discussion, "Multiple meetings with the resources agencies and two site visits were also conducted." The Wildlife Agencies appreciate City planning staff meeting to discuss the proposed trail design; however, the Wildlife Agencies' involvement in the planning process began after the trail proposals were developed at the onset of the public workshop efforts. We expressed similar concerns in our January 20, 2017, comments regarding the timing of engaging with affected stakeholders that they specifically met with designing trails in the East Elliot area. The City indicated that they specifically met with mountain bike representatives but not with other stakeholders. It is unclear what measures were taken by the City to ensure all stakeholders were informed about meetings or if the City has had discussions with other stakeholders outside of management meeting. Also, the Department's broader concerns on this subject are with respect to complying with the procedural requirements under the CEQA.
- A2-24 17. Page 5.1-1, 5.1 Land Use We were unable to locate the consistency analysis examining the implications of the trail proposed within the West Sycamore area extending onto lands associated with the Goodan Ranch Sycamore Canyon Preserve. Please refer to our concerns expressed under Comment #13. A portion of the land holdings associated with Goodan Ranch Sycamore Canyon Preserve is partially owned by the Department. The final PEIR should identify whether any conflicts exist with land use designation or environmental goals associated with the Goodan Ranch Sycamore Canyon Preserve and the implementation of the Plans.
- A2-25
 Additionally, the MSCP SAP Multi-Habitat Planning Area (MHPA) guidelines that are provided for the Eastern Area (Map Note B14) state, "Upon cessation of extractive uses, this site should be reclaimed/restored for open space." According to the PEIR, planning recommendation #12 (3.3.3.1 Park-wide Policies) cites sand and gravel and/or other mineral extraction sites adjacent to MTRP. Section 9.2 (Effects Found Not to Be Significant) acknowledges the existing mineral extraction and concludes that MTRP would continue to be compatible with extraction activities subsequent to implementation of the Plans. However, since the City's SAP includes an applicable map note, we believe the Land Use analysis should have discussed the current extractive uses, status and duration of the existing conditional use permit associated with the extractive use, as well as provided a consistency analysis/findings statement for that activity in relation to each of the Plans. For example the discussion should consider the secondary effects for extractive activities and conformance with the MHPA land use adjacency guidelines.
- A2-26 18. Page 5.1-14. Table 5.1-1 Conservation Element Open Space and Landform Preservation We were unable to locate the specific analysis in the DPEIR that evaluates the MPU's consistency with respect to wildlife movement corridors or localized linkages. We believe such additional discussion is particularly important to include in the final PEIR.
- A2-27 19. Page 5.1-27, bullet point 3) MPU: General Recreation Recommendation #1 The final PEIR should provide an acknowledgement and assurances that the Plan conforms to the

- A2-23 Comment noted. This comment does not address the adequacy or accuracy of the environmental document; however, the City offers the following in response to the comment regarding stakeholder coordination meetings. The City engaged the Wildlife Agencies during the planning process for the MPU and NRMP and has complied with all CEQA noticing requirements. The City held several noticed public workshops and has made significant efforts to coordinate reviews of the MPU and NRMP with the Wildlife Agencies prior to release of the CEQA document for public review. The meeting with the mountain bike stakeholders was held at their request to address concerns raised at public workshops and during the Notice of Preparation (NOP) process. Additional meetings would have been held with other stakeholders had they been specifically requested.
- A2-24 The consistency analysis of proposed trails within the West Sycamore area is provided in Table 5.1-5 of the Draft PEIR; however, a reference to the Rancho Encantada Precise Plan Master Trails Plan has been added to the table for additional context. The Rancho Encantada Precise Plan envisioned trails within MHPA open space as discussed in the referenced table and as shown on the Rancho Encantada Precise Plan Master Trails Plan. Regarding trail connections to the Goodan Ranch Sycamore Canyon Preserve, Table 5.1-5 was revised to specifically reference MPU consistency with the Rancho Encantada Precise Plan regarding this trail connection. Refer also to Response to Comment A2-20.
- A2-25 The existing extraction activities on the adjacent properties are not a part of the project, and thus, their potential impacts are not addressed within this Draft PEIR. The focus of the Draft PEIR discussion related to mineral extraction activities is whether the project could adversely impact the availability of mineral resources or the feasibility of ongoing mining at these adjacent mines. As such, no revisions have been made to the Final PEIR. Additionally, any future development proposed for adjacent extraction sites would be subject to review in accordance with CEQA and the City's Land Development Code, including review for consistency with the MSCP Subarea Plan.

	A2-26 Potential impacts related to migratory wildlife and wildlife corridors/crossings resulting from the project are discussed in Section 5.5.4 of the Draft PEIR (Biological Resources), Issue 2. As detailed in this section, potential impacts related to migratory wildlife were identified as significant. The analysis concludes that compliance with established standards and regulations including Environmentally Sensitive Lands (ESL) Regulations, the MSCP Subarea Plan, the City's Biology Guidelines, and the Mitigation Framework (MM-BIO-2 and MM-LU-1) would reduce potentially significant impacts to below a level of significance. See also Response to Comment A2-4.
	A2-27 Refer to Response to Comment A2-15.
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Trail Design and Maintenance Guidelines that are provided in the City of San Diego's Master Preserve Management Plan (March 2008).

- A2-28

 20. Page 5.5-5, Priority 1 (MSCP required directives) Along with the listing of the Priority 1 directives that are relevant over the lifespan of the NRMP, we also recommend that this section include both general and specific management directives that are provided in the City of San Diego Master Preserve Management Plan (March 2008). For example, one of the key MSCP directives in this document states, "For trails, follow existing pathways or access roads as much as possible rather than entering habitat or wildlife movement areas. Avoid locating trails between two different habitat types (ecotone) for longer than necessary due to the typically heightened resource sensitivity in those locations."
- A2-29

 21. Page 5.5-17, b. Corridor Constraints The corridor constraints discussion states, "...the remaining wildlife undercrossings are not in current need of management action." Given that the Western Tracking Institute's (WTI) evaluation was conducted in 2009, please identify any supplemental evaluations that have been conducted on each of these crossings. According to the WTI study, "Consider a more thorough examination of the current wildlife corridor situation both outside MTRP and within. A determination of how well the external corridors are functioning as well as those within the park will help encourage establishment, enhancement and maintenance of linkages to other core areas while maintaining the integrity of the functioning core areas within MTRP." The WTI study further recommends that the connections to the north through the Sycamore Canyon open space preserve should be addressed. We consider this information critical for any trails proposed within these portions of MTRP and in order to support the current environmental determination.
- A2-30

 22. Page 5.5-19, Table 5.5-6 Sensitive Plant Species Observed within Study Area According to the DPEIR, MTRP is split into four areas; Lake Murray, Cowles Mountain, Mission Gorge, and Fortuna Mountain. Two expansion areas, East Elliott and West Sycamore, are also included. All of these areas are identified in the DPEIR as the study area. In reviewing plants listed in Table 5.5-6, we noticed some documented sensitive plants within MTRP are not listed on this table. For example, Ceanothus verrucosus (CNPS List 2B.2), Juncus acutus subsp. leopoldii (CNPS List 4.2), Quercus engelmannii (CNPS List 4.2), Artemisia palmeri (CNPS List 4.2), and Fremontodendron mexicamum (CNPS List 1B.1) have been recorded in the study area. These species as well as other taxa with CNPS inventory listings are identified in the Checklist of Vascular Plants of Mission Trails Regional Park (Simpson and Rebman 2016.). Therefore, Table 5.5-6 in the final PEIR should include these species.
- A2-31

 23. Page 5.5-33, Issue 2: Migratory Wildlife The analysis briefly describes wildlife movement issues associated with the Oak Canyon area and rerouting of trail alignments. The discussion concludes "... potential NRMP impacts associated with wildlife movement corridors would be less than significant." We are unclear about the background information that supports the environmental determination on this subject. The conclusion relies on a preliminary field assessment conducted by the Wildlife Tracking Company (Martin 2016). However, that preliminary assessment does not identify the level of recreational use associated with a formalized trail in this area and the implications on altering wildlife movement patterns and/or reliance on associated habitat. Until a more comprehensive study of the area is completed, we do not believe the environmental determination (i.e., less than

A2-28 Refer to Response to Comment A2-15.

- A2-29 Comment noted. The City is not aware of any more recent corridor constraint studies completed in the area. The City recognizes the constraints that exist related to wildlife corridors and linkages in the project area and discloses these constraints in the Draft PEIR. See also Response to Comment A2-4.
- A2-30 Comment noted. The species listed on Table 5.5-6 are those that were identified on-site during biological surveys conducted for the project. However, Table 5.5-6 of the Final PEIR has been revised to note the referenced species that are present in the Park and refers to the Checklist of Vascular Plants of Mission Trails Regional Park for a more comprehensive list of plant species present within the project area.
- The purpose of the NRMP is to fulfill the City's MSCP requirement A2-31 to develop ASMDs for the protection of natural resources at the Park. The NRMP also includes management goals and objectives that are intended to support preservation and enhancement of biological resources within the Park. Furthermore, the MPU and NRMP are intended to work in concert with each other to provide the tools necessary to balance resource management and the need for recreational opportunities ensuring that implementation does not negatively degrade the core biological resources in the Park. As such, the impact under Issue 2: Migratory Wildlife for the NRMP is considered less than significant. The discussion preceding the referenced statement discusses NRMP management actions related to habitat connectivity, which supports the less than significant conclusion. The MPU on the other hand includes specific recommendations that could adversely affect biological resources which in turn would require mitigation at the projectlevel. The analysis focuses on those potential impacts and identifies a potentially significant impact. For further discussion of the adequacy of the environmental analysis as it relates to potential project impacts to habitat connectivity/migratory wildlife, refer to Response to Comment A2-4.

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significant) has been demonstrated based on the information provided in the DPEIR. Please refer to the Wildlife Agencies' attached January 20, 2107, letter for our specific concerns with the MPU and some trail alignments proposed within portions of East Elliot.

- A2-32

 Page 5.5-41, 5.5.6 Mitigation Framework As recommended in our May 24, 2013, comment letter, mitigation should occur within the boundaries of MTRP, preferably within the same area as the proposed impact. If feasible, a larger area could be identified and used to mitigate upfront for all anticipated impacts from future implementation of the Plans and associated discretionary actions. Off-site mitigation for any proposed impacts is not recommended due to the high sensitivity of MTRP and it being a core resource area for the City's SAP. This issue is briefly described in the MPU narrative. We believe the mitigation framework discussion in the final PEIR should also describe similar obligations for forthcoming projects described in the MPU.
- A2-33

 Additionally, the north portion of MTRP includes several parcels that have been used as mitigation for various local projects (e.g., Sycamore Landfill, MTRP horse staging facility, City's Habitat Acquisition Fund purchases). To the extent possible, any trail or public facility proposed under the MPU should avoid these areas. Where impacts cannot be avoided to these lands that served as mitigation, mitigation for impacts needs to occur at a minimum double the normal ratio in order to account for the previous mitigation requirement and also provide mitigation for the current proposed impact. The mitigation framework discussion for the final PEIR should be amended to include this condition.
- A2-34
 25. 5.5-41, 5.5.6 Mitigation Framework Mitigation measure MM-BIO-1 states,
 "... subsequent MPU projects that are proposed in undisturbed areas shall be analyzed in accordance with the CEQA Significance Thresholds, which requires that site-specific biological resources surveys be conducted in accordance with City of San Diego Biology Guidelines (2012)." It is unclear if the same assessment will be done in disturbed areas. Sensitive species can be found in disturbed areas. For example the federally endangered Ambrosia pumila occurs in disturbed areas as well Plantago erecta, which is the host plant for the Quino checkerspot butterfly (Euphydryas editha quino). MM-BIO-1 should be revised to reflect the recommendation above.
- A2-35

 26. Page 5.5-45, Wetland Deviation and Biologically Superior Option The DPEIR cites a significant portion of the City ESL regulations and City's Biology Guidelines covering wetland deviations. As part of that detailed discussion, the final PEIR should identify that project-specific environmental review requires that the Wildlife Agencies provide concurrence with the biologically superior project design and analyses. Additionally, concurrence shall be in writing by the Wildlife Agencies prior to or during the public review of the CEQA document in which the biologically superior project design has been fully described and analyzed (i.e., SD LDC Section IIIC 4).
- A2-36 27. Page 5.11-15, a. Barker Way and b. Mission Gorge Road The impact analysis includes a discussion that examined four recommended parking areas with the MPU, anticipated impacts from each of the proposed parking areas, and an environmental determination that impacts related to the recommended parking area would be less than significant. As we expressed in our August 1, 2013, comment letter, during a field visit to Cowles Mountain

- A2-32 Comment noted. The City acknowledges that mitigation within the boundaries of MTRP is preferable. This is specifically addressed in Section 3.1.11 of the MPU. Additionally, MPU Section 6.1.1.4 also provides the opportunity for other City departments to propose and implement mitigation projects within MTRP for environmental impacts occurring inside or outside of MTRP. Although the City anticipates that mitigation for MTRP projects would occur within the boundaries of the Park, if all feasible measures to mitigate for impact in the Park cannot be accomplished, the MPU provides the flexibility to mitigate impacts inside or outside of the MHPA, as is allowed for any development project consistent with the City's Biology Guidelines. As detailed in mitigation measure BIO-1, "Mitigation for impacts to sensitive upland habitats shall occur in accordance with the MSCP mitigation ratios as specified within the City's Biology Guidelines (City of San Diego 2018). These mitigation ratios are based on tier level of the vegetation community, the location of the impact, and the location of the mitigation site(s). For example, impacts to lands inside of the MHPA and mitigated outside the MHPA would have the highest mitigation ratio whereas impacts to lands outside the MHPA and mitigated inside the MHPA would have the lowest mitigation ratio."
- A2-33 The City agrees that if any impacts occur on land that was used to mitigate another project's impacts, those impacts should be mitigated at double the mitigation ratio, consistent with the City's Biology Guidelines. As such, the Mitigation Framework was not revised, as all mitigation for direct impacts would be consistent with the City's Biology Guidelines, as specifically stated in MM-BIO-1 through MM-BIO-3.
- A2-34 Comment noted. MM-BIO-1 has been revised to more clearly reflect that analysis will be conducted in any location in the MPU with the potential to support sensitive biological resources, whether the area is disturbed or not disturbed.

LETTER **RESPONSE** A2-35 The mitigation measure references the recently amended City's Biology Guidelines and ESL Regulations (City of San Diego, 2018), which includes the requirement for Wildlife Agency concurrence. No changes have been made to the Final PEIR Mitigation Framework measure as suggested. A2-36 Comment noted. The City is committed to protecting MSCP-covered habitat throughout the MPU and has recently completed a significant trail maintenance project at Cowles Mountain. Additionally, MPU Section 5.3.5, specifically addresses the proposed parking areas for Cowles Mountain (Facility Recommendations F1 and F2). Furthermore, the proposed parking areas are not anticipated to increase Park usage; rather, they are intended to divert parking away from the residential area to a designated parking area to minimize disruption to the residences in the area. Any potential impacts to biological resources resulting from improvements to these areas will be mitigated in accordance with the Biology Guidelines as required in Mitigation Framework THIS PAGE INTENTIONALLY LEFT BLANK measure MM-BIO-1.

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associated with the Plans.

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Area we observed a very high level of public use and substantial damage to habitat outside of the designated trail system. Based on the deteriorated trail conditions and habitat impacts observed on the south side of Cowles Mountain, the Wildlife Agencies are not in support of parking areas along the east side of Cowles Mountain as we believe that this would only exacerbate the situation by promoting additional uncontrolled access. Our position has not changed on this subject. Prior to considering parking/staging areas, the City should demonstrate substantial progress to protect/recover the MSCP-designated conserved habitat and to restrict human impacts to the existing approved/designated trails, before offering options to construct new facilities.

A2-37 28. Page 5.12-1, 5.12 Public Services - The discussion pertaining to public services includes data on existing servicing numbers for fire and police protection. Absent from the DPEIR's analysis is information on existing staff that support MTRP (e.g., park enforcement and maintenance). Section 3.0 of the DPEIR is limited to citing that City staffing levels at the Park will fluctuate over time. Given that section 5.12.1.4 includes a Parks and Recreation discussion, we recommend more information be provided regarding staff support. We believe information on past and present visitation numbers within the narrative of the PEIR is important, particularly if visitor use increases as a result of improved recreational opportunities. Operational budgets should be increased to keep pace with visitor use A2-38 increases for the necessary staff to enforce park regulations or repair damage to resources. At the onset of our involvement in identifying resource impacts within East Elliot, the City indicated limited staffing and an inability to enforce unauthorized activities in East Elliot. More recently, the City informed the Wildlife Agencies it could or would not enforce use restrictions at East Elliott, including nighttime use, and would not install fencing and could not maintain fencing should it be installed. Section 5.12.4 states the project would provide for increased recreational opportunities, therefore adequate staffing at MTRP is essential for effective management. Any deficiencies in support staff specific to managing MTRP

should be identified at this stage of the PEIR and addressed prior to considering actions

A2-39

29. Page 5.12-6, Issue 1 Public Facilities – The DPEIR states, "Development of recreational facilities in accordance with the MPU could potentially increase the number of visitors to the park." Similar statements regarding potential increase in park visitation are expressed elsewhere in the DPEIR's environmental impact analysis, along with finding statements of less that significant impact. With the exception to the MPU citing numbers of individuals at the MTRP visitor center, we were unable to locate corresponding analysis/data in the body of the DPEIR concerning use numbers elsewhere in MTRP; absent that information we consider the finding statements of less that significant impact to be unsupported. Depending on the level of increased recreational activities, additional detrimental impacts to biological resources could occur. Such conditions are clearly evident for trail impacts at East Elliot and Cowles Mountain. The final PEIR should include additional discussion to address this concern.

A2-40 30. Page 8-2, 8.1.1.1, San Diego River Park Master Plan - Refer to comment #10.

- A2-37 This comment does not address the adequacy or accuracy of the Draft PEIR; however, the City offers the following in response to the comment regarding operational budgets and staffing levels for MTRP. Past and present Park visitation numbers are not readily available and would not add meaningful information to the PEIR. Section 5.1.4 of the MPU identifies Funding Recommendations for the Park, including pursuit of grant funding and non-profit partnerships to implement projects and augment Park staff, and maintenance funding to balance project implementation and create a system to track costs and staff/volunteer labor hours, the latter of which has already been developed and is currently in use. It should be noted, however, that funding for Park projects and staff at any City facility is a budget issue under the purview of the City Council and outside the PEIR process. Also see Response to Comment A2-2.
- A2-38 See Response to Comment A2-37.
- The City does not dispute the fact that implementation of the MPU A2-39 could potentially increase visitor use of the Park. For this reason, the Parks and Recreation Department utilizes trail counters in various areas of the Park to gather visitor use data, which once promulgated, would be used by department ranger staff to support the policies and recommendations in the MPU for management of more heavily used areas where sensitive biological, archaeological or tribal cultural resources could be adversely affected. As a planning document, the MPU and NRMP present a framework for future Park management and improvements, including, but not limited to habitat restoration efforts, closure of unauthorized trails, and implementation of adaptive management strategies to protect biological resources within the Park. Conceptual projects identified in the MPU, and restoration efforts described in the NRMP, would be subject to further review in accordance with the subsequent project review process incorporated into the Mitigation Framework for each issue area analyzed in the PEIR.

	A2-39 (cont.) Once available, the visitor use data described above would guide the design and restoration efforts to ensure that natural and cultural resources within the Park are avoided, and/or impacts are minimized to below a level of significance. Also see Response to Comment A2-37.
	A2-40 Refer to Response to Comment A2-17.
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- A2-41 31. Page 8-3, 8.1.2.1, Sycamore Landfill Master Plan Expansion It would be beneficial for the landfill discussion to cite those lands that were conserved as part of the project's mitigation obligations.
- A2-42 32. Page 10-4, No Project Alternative Refer to comment #1.
- A2-43 33. Page 10-5, 10.2.2.2, Impacts Greater Than the Project The DPEIR concludes "...in the absence of implementation of specific actions identified in the NRMP that would provide biological enhancements to the Park and ensure consistency with the MFPA, the No Project Alternative would result in slightly greater impacts related to land use compared to the Project." Furthermore, the discussion states "under the No Project Alternative, no management actions would be undertaken to protect and enhance habitats for sensitive plant species such as San Diego thornmint or San Diego ambrosia and no management actions would be taken to protect sensitive species (e.g., bats) that occupy cliff dwelling and rocky outcrops. Therefore, impacts to biological resources under the No Project Alternative would be greater than those of the Project."

The No Project Alternative impact analysis implies that absent approval of the Plan, the City would be absolved of specific management/monitoring obligations for sensitive habitats and their species within MTRP. With respect to implementation of the City's SAP, the implication of impact analysis raises concerns with the City's ability to meet its management obligations for covered species. For example, the City has adopted the San Diego Ambrosia Management Plan (May 15, 2000). Under this plan, management measures have included invasive species treatment within areas occupied by San Diego ambrosia. Consequently, a conclusion that no management actions would be taken to protect sensitive species (under the No Project Alternative analysis) is inconsistent with the City's obligations under its SAP. As we expressed in our prior comment letters, regardless of whether the City develops a comprehensive NRMP and MPU, the broader management goals and objectives (e.g., public access control, fencing and gates, ranger patrol, trail maintenance, hydrological management) defined under the section 1.5 of the City's SAP, along with Implementing Agreement conditions, are still required to be fully administered.

A2-44

34. Page 10-7, 10.3 Reduced Project Alternative – The Wildlife Agencies provided preliminary comments to the City in our January 20, 2017, letter regarding concerns we have with the trails proposal in the East Elliot area. As we expressed since the onset of our involvement with the Plans, the MTRP planning area is located within a SAP core biological resource area and functions as important biological habitat in the eastern portion of the City. We continue to emphasize that any proposed improvements (e.g., trails, parking lots, and other public facilities) should avoid and minimize impacts to covered species, sensitive habitats and wildlife movement areas consistent with the City's SAP. We acknowledge that recreational trails (for passive use) in the MHPA are considered a conditionally compatible use. Per the City's SAP, recreational trails in the MHPA should consider the following: locate trails in the least sensitive areas of the MHPA; use existing dirt roads as much as possible; do not locate trails wider than four feet in core areas or wildlife corridors; allow only passive recreational uses; no new trails should be cut through existing habitat; restore existing dirt roads and trails; and avoid vernal pool habitat and their associated watersheds. These management directives need to be followed as part of any trails proposal. The

- A2-41 The City acknowledges that there are conserved lands within the Project area, including lands conserved as a part of mitigation obligations for other approved projects. While these conserved lands are not depicted, the City acknowledges that any impacts to lands that were conserved as part of a mitigation obligation would require a double mitigation ratio to account for both the current and prior project impact. See also Response to Comment A2-33.
- A2-42 Refer to Response to Comment A2-8. In addition, Pages ES-4 and 10-4 of the Final PEIR have been revised to more accurately reflect the City's management responsibilities under the No Project Alternative.
- A2-43 Comment noted. Section 10.2.2.2 of the Final PEIR has been revised to more clearly acknowledge the City's obligations under the MSCP Subarea Plan for the target species noted in the comment. For example, based on the results of MSCP-required rare plant monitoring since 2006, the City of San Diego and/or non-governmental partners have been conducting annual focused weed removal efforts at San Diego ambrosia and San Diego thornmint populations within MTRP.
- A2-44 Comment noted. The MPU includes several recommendations to ensure future trails are consistent with the City's MSCP Subarea Plan and all improvements are sited to minimize impacts to covered species, sensitive habitats, and wildlife movement areas. Implementation of the recommendations for the East Elliott area (Section 5.6 of the MPU) paired with the management actions of the NRMP would fulfill the City's MSCP requirement to develop ASMDs for the protection and enhancement of the natural resources within the Park. Additionally, compliance with the City's MSCP Subarea Plan is referenced in mitigation measure BIO-1 of the Draft PEIR and would be a requirement of future actions, including trail siting and construction.

THIS PAGE INTENTIONALLY LEFT BLANK	A2-44 (cont.) The City acknowledges the Wildlife Agencies' preference for the Reduced Project Alternative. As stated in Draft PEIR Section 10.3.3, the Reduced Project Alternative would not fully meet the project objectives since it would eliminate key trails that would provide connectivity, and as such would not meet the objective to "provide new or alternative routes to improve the recreational connectivity while protecting the Park's natural and cultural resources". CEQA Findings regarding alternatives are included as an attachment to the Planning Report.

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Wildlife Agencies believe the Reduced Project Alternative (and Environmentally Superior Alternative) is aligned more so with those standards than the trail alignment proposed for the Project.

With respect to CEQA compliance, the Department believes the Reduced Project Alternative would feasibly attain most of the basic objectives of the project while avoiding or substantially lessening the significant effects of the Project (CEQA Guidelines, Section 15126.6). Similarly, section 21002 of Public Resources Code states "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects...."

Comments on the Draft Master Plan Update

- A2-45 35. Page 3-14, 3.1.7.4 Electrical Transmission and Generation The discussion mentions that several SDG&E electrical transmission lines traverse portions of MTRP. We recommend that the discussion also include the proposed relocation of the 230 kilovolt (kV) transmission lines that are a component for the approved expansion for the Sycamore Canyon Landfill.
- A2-46

 36. Page 3-22, 3.1.11 Trail/Road Status and Closure The discussion states, "Figure 3-11 shows existing trails and roads that have been in use since before 1991 (114 miles), trails that existed before 1991 but have been subsequently closed and restored (91 miles), and unauthorized trails that have been constructed since 1991 (9 miles)." However, in comparison, section 2.2 of the DPEIR identifies the amount of unauthorized user-created trails at 23.68 miles (covering Lake Murray, Cowles Mountain, Fortuna Mountain, and East Elliot). Please provide clarification or explanation for the variation in numbers reported in the DPEIR versus this section of the MPU.
- A2-47 37. Page 4-12, 4.1.4 Recreational Trails Planning The discussion mentions research conducted by Professor Michael McKinney (University of Tennessee-Knoxville) that showed nationally, that on average a park of 10,000 acres provides approximately 46 miles of trails (excluding utility roads and other trails features) and that MTRP currently provides approximately 49 miles of existing non-road related trails. We gather the intent of the discussion is to provide some level of comparison; however the discussion provides no explanation on whether any of the parks evaluated under McKinney's research support sensitive biological resources or were established as biological preserves/mitigation pursuant to an HCP or similar planning mandates. Additionally, please provide references for this research.
- A2-48

 38. Page 5-4, 5.1.3 Management Recommendations We request that a measure be added in this section of the MPU for coordination between City MSCP Planning staff and the Wildlife Agencies. This measure would help ensure ongoing compliance with the City's SAP. Additionally, the listed Management Recommendations did not include whether options exist to co-locate trails with utility service roads, as required by the City's SAP. This issue was previously raised by the Wildlife Agencies during our review of the prepublic version of the MPU.

Comments A2-45 through A2-51 are specific to the Draft Master Plan Update and do not address the adequacy or accuracy of the Draft PEIR; however, the City offers the following responses:

- A2-45 The referenced discussion is to provide basic information about existing conditions relative to electrical transmission and generation. The relocation of transmission lines is not a part of the MPU and thus, is not referenced in this section.
- A2-46 Comment acknowledged. In response to this comment, the amount of "authorized trails" verses "unauthorized trails" within the Park were recalculated to identify any discrepancies and/or verify current information. As a result, the MPU has been revised accordingly or remains the same as further described. Trail Status/Closure data in Section 3.1.11 is correct; however, the data in the corresponding Table 3-2 has been revised as follows: Class 1/Multi-use Path no change; Multi-use Trail no change; Hike/Bike Trail 52.56, Hiking Trail 15.50, Unauthorized Trail 9.09; Non-Trail Road 32.51. New Total = 124.50. Accordingly, Section 2.2.1.1-1.6 in the FEIR has also been revised to ensure consistency between the two documents.
- A2-47 Comment noted. The referenced research is based on a paper published in the journal *Animal Conservation* (Volume 8, 2005, pages 135 141) published by the Zoological Society of London. The author, Michael L. McKinney is from the Department of Geological Sciences at the University of Tennessee in Knoxville, Tennessee. The results published in the paper are based on an analysis of 688 State Parks and 41 National Parks. While specific details of each park and the presence or absence of HCPs is not known, National Parks do have a mandate to preserve natural lands. The Organic Act that established the National Park Service states goals for the Park Service "which purpose is to conserve the scenery and the natural and historic objects and the wildlife therein and to provide for the enjoyment of the same in such manner and by such

	A2-47 (cont.)
	means as will leave them unimpaired for the enjoyment of future generations." While specific State Park goals and mandates vary, overarching goals should be reasonably assumed to include preservation of natural resources.
	A2-48 Monthly coordination meetings are held with the City and Wildlife Agencies to discuss a variety of MSCP-related issues including, but not limited to boundary line adjustments and project-specific mitigation requirements. Ongoing issues regarding management of MTRP can also be added to the agenda of one of these regular coordination meetings. It should be noted that as projects are conceptualized and designed, staff would be required to review for compliance with the MPU, PEIR, MSCP Subarea Plan, and the Biology Guidelines (Mitigation Framework MM-BIO-1 through 3). Coordination with the Wildlife Agencies would occur during this review process, when applicable.
THIS PAGE INTENTIONALLY LEFT BLANK	Trail colocation along utility access roads was prioritized to the extent feasible in the MPU. Although trail co-location is not specifically addressed in the MPU, Management Recommendation #2 addresses maintenance of utility access roads to allow for continued use of walking and riding surfaces that are conducive to recreational use. No changes have been made to the MPU in response to this comment.

A2-49 This comment does not address the adequacy or accuracy of the Ms. Myra Herrmann (FWS/CDFW-13B0298-17TA0542) Enclosure Page 10 environmental document; however, the City offers the following A2-49 information: Park roads and parking areas around the Park are Page 5-8, 5.1.6 Habitat/Species Recommendations - Along with the measures provided under Recommendation #4 (i.e., Maintain and enhance where possible all regional and generally closed at night; however, the City does not close the Park local wildlife corridors in and around the park areas), for known wildlife movement at night. Most City parks are open 24 hours a day with a few corridors, the recommendation should specify that no nighttime access will be allowed (including no lighting devices allowed in these areas by either hikers or bicyclists). exceptions that are specifically targeted at public safety or are noted in the San Diego Municipal Code under section 63.0120. City A2-50 Page 5-15, 5.2.4 Habitat/Species Recommendations - This recommendation should include measures to evaluate the minimum width requirement for utility service roads, and whether Park Rangers are in regular contact with Officers from the San options are available to restore some of the disturbed habitat along these service roads if Diego Police Department and have, and will continue, to conduct options exist to reduce the width of service roads. joint Ranger-PD Officer patrols of areas where impacts to habitat A2-51 41. Page 5-53, 5.6.5 Recreation Recommendations - See attached comments from Wildlife within the MSCP have been documented, reported, or have a Agencies, dated January 20, 2017, regarding specific concerns with proposed trail alignments within the Oak Canyon area (East Elliot). Additionally, please refer to the probability of occurring. Furthermore, there are no provisions in resource concerns expressed in the Memorandum prepared by the City's Park and the Municipal Code precluding the use of headlamps or flashlights Recreation Department (Chris Zirkle, Deputy Director, Parks and Recreation) entitled. Item 303 on the Task Force's December 21, 2013 meeting Agenda, "East Elliot Trail by hikers or bikers in City parks. Restoration and Closure" to the Members of the Mission Trails Regional Park Task Force. The memorandum outlines the significance of resources in the East Elliot area, regulatory obligations, and provides responses to public questions received on the topic of whether A2-50 Utility road widths are addressed in the MPU, Section 5.1.3 threats to the environment exist from trail use. The memo's response to the public Management Recommendation #2. No change has been made to questions on resource threats from trail use stated "Several studies, including those referenced in the International Mountain Biking Association's 'Managing Mountain the referenced section since this recommendation would apply Biking book (Chapter 5) substantiate wildlife impacts from recreational use. A typically throughout the Park. considered distance of impact is 100 feet from a trail." A corresponding graphic (Attachment 8) was included with the memorandum that depicted setback distances required from trails. A2-51 See Response to Comment A2-4 regarding trail alignments in Oak Comments on the Draft Natural Resource Management Plan Canyon. The context of the referenced City of San Diego Memorandum was in relation to rebuttals provided by the City's A2-52 Page 1.1. 1.0 Introduction - The MPU would be updated every fifteen to twenty years to keep current with new planning requirements, environmental knowledge, completed Parks and Recreation Department to members of the MTRP Task projects, and recreational needs. Similarly, the timing for updating the NRMP or criteria Force that trail use does not threaten the environment. This that triggers updating should be provided in this section of the NRMP. information is not contrary to information stated in the Draft PEIR, A2-53 43. Page 2-28, 2.2.4.1 Corridor Constraints within MTRP - The first paragraph states, "The as significant biological resources impacts are identified. The East Elliot area shares approximately 47 of its boundaries with developed lands...." We assume this sentence should state 47 percent - if that is correct, please revise. referenced graphic shows what a 100-foot buffer from the edge of trails would look like, but does not indicate that those are "required A2-54 44. Page 2-34, b. Oak Canyon Bridge and d. Spring Canyon Bridge - The DPEIR includes a trail proposal through Oak Canyon. The discussion states, "Due to the height and width of setback distances." the undercrossing and the distance from major recreation uses, this wildlife crossing does not appear to be constrained, and no management actions are recommended." Similarly, no management actions were recommended for the Spring Canyon Bridge. We believe this could contribute to increased recreational use of this trail, thereby negatively affecting wildlife use in the crossing and surrounding area (e.g., safe harbor zones). According to the

Comments A2-52 through A2-82 are specific to the Draft Natural Resources Management Plan and do not address the adequacy or accuracy of the Draft PEIR; however, the City offers the following responses: A2-52 NRMPs are updated on a rotating basis by the Park & Recreation Department Open Space Division as staffing and funding allows and are prioritized based on a variety of conditions, including, but not limited to habitat conditions, impacts, public interface, projects, and community input. A2-53 The referenced sentence in the NRMP has been corrected as noted. A2-54 Refer to Response to Comment A2-4. Section 4.0 of the NRMP adequately identifies threats and stressors to the preserve and management actions. THIS PAGE INTENTIONALLY LEFT BLANK

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WTT's findings, "There is human use of this corridor but since it is more remote it is not as impacted as Spring Canyon; hiker, biker, dog and equestrian evidence was found in the Oak Canyon corridor squeeze point." WTT's recommendations included considering a more thorough examination of the current wildlife corridor situation both outside MTRP and within. The Final Environmental Impact Statement for the construction of this segment of SR-52 cited the "heavy use" of Oak Canyon by mule deer, and included as mitigation the construction of high bridges at Oak Canyon and Spring Canyon to permit the continued passage of wildlife (California Department of Transportation 1989). The Wildlife Agencies again request elimination of the proposed trail under SR-52 at Oak Canyon. The NRMP should acknowledge priority threats and stressors in the process of development of a comprehensive list of management actions. Additionally, the NRMP should include the standards by which potential issues of concern will be reevaluated (e.g., following SMART criteria).

- A2-55 45. Page 2-15, Table 2-5 Table 2-5 should crosswalk SANDAG vegetation communities with the vegetation communities found within the MSCP SAP.
- 46. Page 2-35, f. San Diego River Course Refer to comment #9 (Page 3-9, b. Planning Recommendations Item #18) regarding our issues with the application of the measure prescribed in the SDRPMP.
- A2-57 47. Page 3-2, 3.2 Multi-Habitat Planning Area Guidelines for MTRP The discussion refers to pertinent sections from the City's SAP and MHPA compliance guidance that will be important for the MPU and NRMP. In considering the specific guidelines provided for the Eastern Area under the SAP, condition B14 states, "upon cessation of extractive uses, the site should be reclaimed/restored for open space." This same condition is identified as a Priority 2 for Mission Trails Regional Park (1.5.6 Specific Management Directives for the Eastern Area). Given the relevance of this recommendation in the SAP, we recommend amending the NRMP to include this obligation.
- Page 4-7, 4.2.1.1 Human Use of Preserves A portion of the discussion states "...limiting authorized trail access to daylight hours, having a clear patrol and violation enforcement strategy can help reduce some of the risks posed by recreation." The discussion further states. "...the East Elliot area is not fully owned by the City and, consequently, does not have an active signage or user education program installed. Signage and user education within this area is being addressed in the MPU." According to the City's statements. land acquisition by the City in East Elliot has been occurring since 2000 consistent with the City's obligations to target the acquisition of land within the MHPA. Acquisition funding has included federal and state grant money programmed for habitat preservation. According to the City (Memorandum entitled: Item 303 on the Task Force's December 21, 2013 meeting Agenda, "East Elliot Trail Restoration and Closure"), most of the disturbances between 2010 and the present were built on property that was owned by the City at the time of the unauthorized disturbances. The NRMP needs to include guidance of the specific enforcement strategy that is in place that will effectively deal with unauthorized activities in MTRP. Our concerns on this subject are based in part on a prior meeting with the Wildlife Agencies in which the City emphasized it could or would not enforce use restrictions at East Elliot, including nighttime use, is unwilling to install fencing, and could

- A2-55 Holland vegetation data is included in Table 2-3 of the NRMP.
- A2-56 Refer to Response to Comment A2-17.
- A2-57 As stated in the NRMP, "the City's Subarea Plan provides guidelines for MHPA compliance and specific management recommendations within MTRP." As such, the NRMP is focused on management obligations for MSCP-covered species within the Park boundaries. These obligations are consistent with the requirements of the MSCP Subarea Plan. The City also acknowledges that restoration of extractive activities areas located outside of the Park is identified as Priority 2 for MTRP in the MSCP Subarea Plan. However, reclamation and restoration of lands not owned by the City of San Diego is outside the purview of this project and therefore not considered an obligation of the NRMP. Thus, information to address offsite extraction activities was not added to the NRMP as suggested.
- A2-58 See Response to Comment A2-12 and A2-49.

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not maintain fencing once installed. In addition, the City indicated that they would not include enforcement measures such as confiscating bicycles. Conversely we received prior comments from the City during the preliminary review period of the MPU and NRMP which indicated that triggers of increased enforcement at MTRP included evidence of night-time park use and impacts to discrete sensitive biological resources, accompanied by progressive penalties for violations that included warnings, citations, and confiscation. Therefore, we are hopeful that a more concerted effort will be directed at resolving this issue.

- A2-59 49. Page 4-8, 4.2.1.6 Pests and Disease The discussion includes the potential to impact natural resources at MTRP from goldspotted oak borer (Agrilus auroguttatus); however, there is no mention on the likelihood for Kuroshio shot hole borer (and pathogenic fungus, Fusarium euwallaceae). Kuroshio shot hole borer and its associated fungi were first detected in San Diego County in 2012. Please revise the NRMP to include this concern. We recommend referring to the website Invasive Shot Hole Borers/Fusarium Dieback (http://eskalenlab.ucr.edu/pshb.html) and Southern California Shot Hole Borers/Fusarium Dieback Management Strategy for Natural and Urban Landscapes (SANDAG 2016) for relevant guidance on this subject. Additionally, we recommend the NRMP includes measures to coordinate with regional entities (e.g., University of California Cooperative Extension, UC Riverside) for expertise in detecting or verifying infestations or for field training to conduct assessments or protocol surveys specific to the infestation.
- A2-60 50. Page 4-10, 4.2.2.4 Utility and Service Line The discussion states, "The conservation efforts of SDG&E and SDCWA are independent of MTRP and the City MSCP Subarea Plan, but generally overlap in their conservation goals. Please include additional discussion in this section on the level of coordination that currently exists between MTRP staff and activities that are conducted by utility companies.
- A2-61 51. Page 4-12, 4.3.1 Management Action Tool Box The management actions provided in this section include the general process for trail closure and trail reroutes. In reviewing the management goals and objective elsewhere in the plan, there are descriptions of trail rerouting and closures; however, the level of priority placed on closing a particular trail or the timeframe for addressing resource impacts is not clearly explained. Please include additional information to address this concern.
- A2-62 52. Page 4-13, 4.3.1.4 Habitat Restoration Please include an overview of general standards that are required to be followed when restoring native habitat within MTRP. We recognize that the NRMP identifies specific restoration proposals within guild areas; however, we believe it would be beneficial to include the guidance on the general criteria/standards that will be followed (e.g., seed sourcing, selection of native plant palettes).
- A2-63 53. Page 4-13, 4.3.1.5 Ranger Patrols We recommend the City have a program that provides enforcement reporting that includes information on the number and type of violations identified in the NRMP seen most frequently and that tracks the success of any measures implemented to address the violations. We recommend the Plans include this detail given the level of recreational pressures placed on existing biological resources.

- A2-59 Comment noted. As recommended, language has been added to Section 4.2.1.6 of the NRMP to address protocols to monitor for the Kuroshio shot hole borer and its associated pathogenic fungus (Fusarium euwallaceae) within MTRP. These measures have also been applied at numerous riparian sites within City-managed land and include coordination with regional entities having knowledge and expertise in detecting and verifying infestations, field training, and protocols for treatment of this pest.
- A2-60 The City regularly coordinates with SDG&E and the SDCWA in relation to work within each agency respective easement(s). If work efforts extend outside established easement areas, City staff is involved in the review process to ensure that conservation goals and mitigation requirements are not in conflict with the City's MSCP Subarea Plan and ESL Regulations.
- A2-61 The NRMP identifies five priority species including: San Diego thornmint (*Acanthomintha ilicifolia*); San Diego ambrosia (*Ambrosia pumila*); Variegated dudleya (*Dudleya variegata*); Willowy monardella (*Monardella viminea*); and Coastal Cactus Wren (*Campylorhynchus brunneicapillus couesi*). The NRMP also identifies five priority management guilds including: Cliffs and Rocky Outcrops; East Elliott Clay Ridgelines; Tierrasanta Clay Ridge; Riparian Woodlands; and Coastal Sage Scrub Artemisia/Eriogonum. Trail closures would be prioritized based on available funding and consideration of these NRMP priorities.
- A2-62 Future restoration proposals implemented in accordance with the MPU and NRMP would be required to develop and submit a site-specific management plan for City staff review that would address details such as, but not limited to, seed sourcing and selection of native plant palettes for the target species to be restored.
- A2-63 Comment noted. See Responses to Comments A2-8 and A2-12.

thornmint has been extirated and then survey to determine if the species is still present. A2-66 56. Page 4-21, 4.4.1.4 Management Goals and Objectives — A commitment by the specific City Department that will be responsible for implementing a particular management goal objective needs to be provided for all applicable sections of the NRMP. The guidance on this issue is limited to reference (ity stiff. We acknowledge the City sprior position on this subject that department among or City preserve lands. Additionally, the City has prepared NRMBs for other preserve areas that specifically individual to the terminal produced preserve ands. Additionally, the City has prepared NRMBs for other preserve areas that specifically individual to conduct management and monitoring activities associated with natural resources. At a minimum, the NRMP shootd specify the biological experts required to conduct management and monitoring tasks (e.g., academic credentials and permits) as opposed to defaulting to the term City staff. A2-67 57. Page 4-25, 4.4.1.5 Monitoring — This section states "Monitoring whall be based on the MSCP rare plant monitoring protocols which specify both the methods and the locations for monitoring selection." This same condition is talted for the other priviley plant species that will be monitored. Each of these sections that include this statement should also identify whether monitoring villocure anomally (or a particular monitoring postation). Please include the citation within this section (as well as Section 6.0 References), regarding the reference to use methods comparable to those utilized by CFI during their TransNetfunded flake bronne study. A2-68 58. Page 4-29, Figure 4-6. There is a solid white line going into a population (Occurrence C) of San Diego ambrosia. The Figure should identify whether this is a trail. A2-69 59. Page 4-37, Objective 3. Trail Rerouting — According to the discussion and informal trail to the plant of trail closure is depotitive to the San Diego ambrosia. Please provide	M	s. My	ra Herrmann (FWS/CDFW- 13B0298-17TA0542) Enclosure Page 13		
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he reference to use methods comparable to those utilized by CBI during their TransNet- funded false brome study. A2-68 58. Page 4-29, Figure 4-6 – There is a solid white line going into a population (Occurrence C) of San Diego ambrosia. The Figure should identify whether this is a trail. A2-69 59. Page 4-37, Objective 3: Trail Rerouting – According to the discussion an informal trail crossing through Occurrence D along the Grassland Loop Trail has been closed via signage, fencing, and vegetation brushing (see Figure 4-9a). In our review of the corresponding figure the planned trail closure is depicted, however, a multi-use trail is currently shown splitting the two occurrences of San Diego ambrosia. Please provide further guidance to address this concern and the management recommendations that would be implemented to adequately protect San Diego ambrosia. We recommend exclusionary fencing be installed at this area to preclude impacts to the Sam Diego ambrosia from trail use. A2-70 60. Page 4-39, 4.4.3 Variegated Dudleya (Dudleya variegate) – We suggest including a photograph of variegated dudleya similar to the photographs provided for other sensitive plants covered by the NRMP. A2-71 61. Pages 4-50, 4.4.3.4 Management Goals and Objectives – The discussion pertaining to			Department that will be responsible for implementing a particular management goal/objective needs to be provided for all applicable sections of the NRMP. The guidance on this issue is limited to referencing City staff. We acknowledge the City's prior position on this subject that department names and overall City organization may change over the life of the NRMP; however, the City currently has specific programs that implement management and monitoring of City preserve lands. Additionally, the City has prepared NRMPs for other preserve areas that specifically identify the City program that will be responsible for performing management and monitoring activities associated with natural resources. At a minimum, the NRMP should specify the biological expertise required to conduct management and monitoring tasks (e.g., academic credentials and permits) as opposed to defaulting to the term City staff. Page 4-25, 4.4.1.5 Monitoring – This section states "Monitoring shall be based on the MSCP rare plant monitoring protocols which specify both the methods and the locations for monitoring actions." This same condition is listed for the other priority plant species that will be monitored. Each of these sections that include this statement should also identify whether monitoring will occur annually (or on a particular monitoring rotation).	A2-66	Comment noted. Implementation of the overall MSCP Subarea Plan is a coordinated effort spread across several City departments, which include qualified biologists and park rangers with knowledge and expertise in the field of biology and/or resource management. While the MSCP Subarea Plan does not require that the City provide a detailed listing of the departments/programs and/or staff responsible for MSCP implementation, as this information can change over time and become outdated, the NRMP has been updated to provide clarification regarding the level of technical
of San Diego ambrosia. The Figure should identify whether this is a trail. A2-69 59. Page 4-37, Objective 3: Trail Rerouting – According to the discussion an informal trail crossing through Occurrence D along the Grassland Loop Trail has been closed via signage, fencing, and vegetation brushing (see Figure 4-9a). In our review of the corresponding figure the planned trail closure is depicted; however, a multi-use trail is currently shown splitting the two occurrences of San Diego ambrosia. Please provide further guidance to address this concern and the management recommendations that would be implemented to adequately protect San Diego ambrosia. We recommend exclusionary fencing be installed at this area to preclude impacts to the San Diego ambrosia from trail use. A2-70 60. Page 4-39, 4.4.3 Variegated Dudleya (Dudleya variegate) – We suggest including a photograph of variegated dudleya similar to the photographs provided for other sensitive plants covered by the NRMP. A2-71 61. Pages 4-50, 4.4.3 Management Goals and Objectives – The discussion pertaining to			the reference to use methods comparable to those utilized by CBI during their TransNet- funded false brome study.	Δ2-67	
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A2-70 60. Page 4-39, 4.4.3 Variegated Dudleya Variegate) – We suggest including a photograph of variegated dudleya similar to the photographs provided for other sensitive plants covered by the NRMP. A2-71 61. Pages 4-50, 4.4.3 4 Management Goals and Objectives – The discussion pertaining to	A2-69	59.	crossing through Occurrence D along the Grassland Loop Trail has been closed via signage, fencing, and vegetation brushing (see Figure 4-9a). In our review of the corresponding figure the planned trail closure is depicted; however, a multi-use trail is currently shown splitting the two occurrences of San Diego ambrosia. Please provide further guidance to address this		NRMP has been updated to include the citation for the CBI Brachypodium study.
A2-70 60. Page 4-39, 4.4.3 Variegated Dudleya (<i>Dudleya variegate</i>) — We suggest including a photograph of variegated dudleya similar to the photographs provided for other sensitive plants covered by the NRMP. A2-71 61. Pages 4-50, 4.4.3.4 Management Goals and Objectives – The discussion pertaining to Figure 4-6 as "Other Circulation".			protect San Diego ambrosia. We recommend exclusionary fencing be installed at this area	A2-68	paved and decomposed granite access roads for the Kumeyaay
1/2 11 and a second of the sec	A2-70	60.	photograph of variegated dudleya similar to the photographs provided for other sensitive		Variegated Dudleya. There is exclusionary fencing around this area to prevent unauthorized entry. This is shown on the legend on
surveying for known populations of variegated dudleya mentions that if a population is not	A2-71	61.	Pages 4-50, 4.4.3.4 Management Goals and Objectives – The discussion pertaining to surveying for known populations of variegated dudleya mentions that if a population is not		Figure 4-6 as "Other Circulation".

A2-69 The referenced multi-use trail is an existing trail. The MPU includes (Fortuna Mountain recommendation Recreation Recommendation R45) to assess a section of the grasslands loop trail for reroute to prevent degradation of nearby sensitive resources. This is the existing section that crosses through San Diego Ambrosia (Occurrence D) as shown in NRMP Figure 4-9a. The NRMP includes guidance for trail reroutes by indicating a minimum 25-foot buffer around known populations of San Diego Ambrosia (Objective 3, third bullet, page 4-37). A2-70 Comment noted. A photograph of Variegated Dudleya has been added to the NRMP as Photograph 4-5. A2-71 The MSCP rare plant monitoring monitors annually at long-term sites whether species are present or absent. The additional surveys discussed here include a timeline based on personal communications with RECON biologist, Mark Dodero, who is an expert on Variegated Dudleya. To further clarify the requirements THIS PAGE INTENTIONALLY LEFT BLANK of the two additional surveys, an additional criterion was added to the NRMP to note that if weeds are present, the site should be weeded early in the season prior to the repeat surveys to optimize conditions for regrowth of the species. Additionally, the requirement to revisit the site once per decade was revised to indicate "approximately once per decade, during an above normal rainfall year." Refer to Section 4.4.3.4, Objective 1 for the revisions incorporated.

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observed after two surveys under good conditions, the site shall be considered abandoned and revisited once per decade. Please provide the specific justification for settling on that survey timeline.

- A2-72 62. Page 4-67, Objective 4: Exclusion Feneing/Signage The discussion does not mention if park ranger patrols would be a component of the measure to prevent unauthorized recreational use. Given the amount of planned trail closures shown in Figure 4-19 b, please include additional discussion on the process for directing ranger staff to areas that are subject to the higher levels of recreational use.
 - Additionally, the NRMP states that once all of East Elliot is acquired signage and barriers will be installed and maintained at all MTRP gates to prevent unauthorized recreational uses. Consistent with the ASMDs for willowy monardella, the Wildlife Agencies recommend the City review the trail plan and the current City ownership to determine if strategically placing signage and barriers on City owned lands could be done proactively to preclude recreational impacts to willowy monardella.
- A2-73 63. Page 4-76, 4.4.5.5 Monitoring/Survey The discussion identifies conducting presence/absence surveys for coastal cactus wren. We recommend the appendix include all of the survey methodologies (or standardized protocols) that will be used in conjunction with implementing the NRMP.
- A2-74 64. Page 4-80, c. Existing Conditions Western red bat (Lasiurus blossevillii; California Species of Special Concern) was listed on Table 4-12 (sensitive species observed within the cliffs and rocky outcropping management guild at MTRP), whereas Appendix A-C (A-C,2.40) mentions western red bat was detected incidentally during surveys for cliff-roosting bats. Since western red bat (SSC) is a riparian tree roosting bat, we recommend revising the discussion to reflect that information.
- A2-75 65. Page 4-84, 4.5.1.5 Monitoring Until funds are allocated for more comprehensive monitoring for bat populations at MTRP, we suggest that the recommended management actions at a minimum cite/evaluate the long-term monitoring strategies outlined in bat inventory work conducted by the U.S. Geological Survey (Stokes et al. 2005, Bat inventory of the multiple species conservation program area in San Diego County, California, U.S. Geological Survey final report prepared for the County of San Diego and California Department of Fish and Game, San Diego, CA, 97 pp.). Additionally, the management/monitoring action should include training for park rangers and habitat manager as part of the interim monitoring actions.
- A2-76 66. Page 4-89, a. Recreational Activities -Trampling and Page 4-92, Figure 4-29 The proposed trail on the western side of East Elliot appears to go through areas that are identified as clay ridgeline guild. In our January 20, 2017, letter we stated that we do not support a trail through the length of Oak Canyon extending north of SR-52 based on potential impacts to wildlife. The presence of the clay ridge guild, and the sensitive resources associated within the proposed trail alignment, adds further evidence that a trail in this area of East Elliot is not consistent with conservation of sensitive resources within East Elliot. The existing user-created trails in East Elliot are unauthorized, and therefore

- A2-72 Section 4.3.1 of the NRMP addresses unauthorized trail closure, in general, and states that currently unauthorized trail closure is conducted by ranger staff and volunteer groups within the Park. The MPU more directly addresses Park management and includes Management Recommendation #14 to conduct regular patrols of the Park and enforce Park rules, regulations and boundaries. Additionally, the MPU, Section 3.3.1, Prioritization states, "when overall Park management responsibilities exceed staffing resources, initial priority would be given to day-to-day management activities, such as patrols and enforcement". The comment regarding placement of signage and barriers is noted.
- A2-73 For each of the sensitive species addressed in Section 4.4, there is a subsection addressing monitoring that explains what monitoring protocols will be used. Since published protocol methodologies can change, they are not included in the appendix so that the most current accepted protocol requirements can be used. No revision was made to the NRMP as suggested.
- A2-74 Both referenced tables are correct. The Western red bat was observed within the cliffs and rocky outcropping management guild and thus, is included in Table 4-12. Appendix AC provides additional information about the Western red bat stating that "the western red bat was detected incidentally during surveys for cliff-roosting bats. This species was most likely not a roosting inhabitant of the cliffs, but rather foraging nearby, based on the behavioral observations in the field". The term 'incidentally' is correctly used in this context since it is meant to describe that the bat is not an inhabitant of the cliffs. No revision was made to the NRMP as suggested.

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THIS PAGE INTENTIONALLY LEFT BLANK	A2-75 Bats are not covered by the MSCP. Therefore, monitoring efforts are prioritized accordingly for these species. It should be noted that trail planning analysis evaluated impacts to bats, and it was determined that long-term MSCP management efforts within MTRP are expected to be beneficial to the bats. Monitoring methods will be informed by the recommendations included in <i>Bat Inventory of the Multiple Species Conservation Program Area in San Diego County, California</i> (Stokes et al, 2005) as well as the best available science, and will be implemented as resources and funding allows. A2-76 Comment noted. The NRMP, Section 4.5.2.4, Objective 1 addresses protection of clay ridgelines and discusses how proposed trail closures and reroutes identified in the MPU would minimize impacts to the clay ridgelines. Refer to Response to Comment A2-4 for additional discussion regarding potential impacts to wildlife associated with the Oak Canyon Trail.

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any uses here should be considered new; trail alignments and mitigation should be consistent with the MSCP and MTRP NRMP.

- A2-77 67. Page 4-90, Objective 1: Trail Closure/Reroutes The objective states, "As a part of the Master Plan Update associated with the document, new trail use within the guild boundaries will be minimized and trail redundancies will be eliminated or rerouted around Management Guild areas when possible (Figure 4-29)." Please provide the criteria for when a trail would not be relocated. Also, the City previously indicated that the NRMP will identify the total miles of existing trails that will be removed or re-routed from Guild boundaries, as well as the miles and percentage that are proposed to enter Guild boundaries. We recommend that section 4.3 of the NRMP (Adaptive Management; 4.3.1.1 Trail Closures) be revised to include that information, along with a prioritization list for trail closure and re-routing within MTRP. This information should match with any corresponding analysis provided in the PEIR and MPU.
- A2-78
 68. Page 4-105, 4.5.4.3 Threats at MTRP (Riparian Woodlands) The discussion states that riparian woodlands at MTRP are relatively healthy and do not have significant unmanaged threats. The current discussion does not provide any specific information on efforts needed to maintain or enhance the quality of water resources in MTRP. The San Diego River extends through MTRP; therefore it seems appropriate to provide an overview of any existing water quality monitoring efforts (e.g., sampling benthic macro-invertebrate assemblages for ambient bioassessment monitoring purposes) that are currently in place to address this issue.
- A2-79 69. Page 4-106, 4.5.4.4 Monitoring and Management Goals The City has previously dealt with aquatic weed infestation (Ludwigia spp.) within Kumeyaay Lake, Given that riparian woodland guild includes Kumeyaay Lake, we recommend that the NRMP include a discussion on whether any consideration was given to including management and monitoring for other types of invasive species (e.g., aquatic weed species, quagga mussels, non-native turtles). For example, the threats section (4.5.4.2) does not identify whether any consideration was given to implementing a monitoring and control program for bullfrogs (Lithobates catesbeianus). The City has identified instituting a similar program for other preserve areas that the City is responsible for managing. There should be discussion on threats/stressors and where possible identify triggers for when monitoring and management actions would be initiated.
- A2-80 70. Page 4-109, d. Belding's Orange-Throated Whiptail The Department previously awarded a Local Assistance Grant (P0150008) to the City of Chula Vista for the preparation of the Chula Vista Central City Preserve Area Specific Management Directive for Preserve Management Area 1 (RECON 2004). The area specific management directive that was prepared for Belding's orange-throated whiptail included the following recommendation: "Management for Belding's orange-throated whiptail on the PMA will consist of monitoring efforts, maintaining existing potential habitat, encouraging habitat inhabited by prey species, and maintaining linkages to off-site habitat. Belding's orange-throated whiptail's preferred prey is termites, and areas where this prey would be present, such as in woodpiles and sticks and leaf litter should be left undisturbed or disturbance should be

- A2-77 Trail closure/re-routing decisions will be determined by the Park and Recreation Department on a case-by-case basis in consultation with qualified biological staff and park rangers familiar with the conditions and biological sensitivity of the specific area, taking into consideration the requirements established in the NRMP for such efforts.
- A2-78 A note has been added in this section to address existing water quality efforts.
- 2-79 Kumeyaay Lake is not prioritized for invasive species monitoring/management due to not being identified as regionally-significant or high quality native aquatic species (e.g., pond turtle) habitat (see Brown et al. 2015).

A2-80 Research by Setter and Myles on termites conducted in MTRP in the early 2000s revealed a variety of species across the site. Based on this information, the City does not recommend additional surveys on termites at this time (American Entymologist, Summer 2005). No revisions have been made to the NRMP in response to this comment.

Ms. Myra Herrmann (FWS/CDFW-13B0298-17TA0542)

- Enclosure Page 16
- minimized by other management actions such as weed control efforts." We believe this is a relevant management recommendation that should be included in the NRMP.
- A2-81 71. Page 5.1, 5.0 Budget and Schedule The NRMP and final PEIR should include a detailed summary regarding how the funding estimates were compiled and a discussion on how the City will fund management in perpetuity.
- A2-82 72. Page AC-1 (Appendix A-C), Sensitive Species at MTRP not Selected for Individual Management The discussion states, "MSCP covered species within section A-C.1 may be prioritized for individual management at a later date if conditions change significantly with the park and/or regionally for the species. These management prioritization decisions will be made by City staff in coordination with regional conservation efforts (SDMMP) as part of an adaptive management framework." According to Section 1.0, one of the specific objectives of the NRMP is to develop an adaptive management framework that addresses the identified threats and ensures long-term, viable populations of these species within MTRP. Given the extent of recreational pressures imposed on resources (including future trails) within MTRP, we believe as part of an annual work plan a review of each sensitive species be performed to determine if conditions have changed that would merit individual management actions. This type of evaluation follows the "SMART" criteria (i.e., Specific, Measurable, Achievable, Results-oriented, and Time-fixed) that are needed to fully support the species covered by the NRMP.

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- Martin, C. 2016. Mission Trails Regional Park Oak Canyon Wildlife Assessment Related to a Proposed Trails Realignment Summary of Findings. Prepared for the City of San Diego. 15 pp
- Simpson, M.G. and J.P. Rebman. 2016. Checklist of the Vascular Plants of Mission Trails Regional Park, San Diego, California. 3rd Edition, 48 p.
- [RECON] RECON Environmental, Inc. 2004. Chula Vista Central City Preserve Area Specific Management Directives (ASMDs) for Preserve Management Area 1 (PMA 1), City of Chula Vista, prepared by RECON Environmental, Inc., April 26, 2004

- A2-81 The City is committed to funding management and implementation of the NRMP and will provide funding via a variety of sources including funding from the General Fund, Environmental Growth Fund (EGF), Regional Park Improvement Fund (RPIF), grants and collaboration with our non-profit partners.
- A2-82 The Park & Recreation Department annually conducts rare species monitoring and utilizes the resulting data to develop management actions and strategies for the protection of MSCP covered species. No revisions have been made to the NRMP in response to this comment.

Enclosure 2



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



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

In Reply Refer To: FWS/CDFW-SDG-13B0298-17TA0296

20 January 2017 Sent by email

Ms. Alyssa M. Muto Deputy Director of Environment and Policy Analysis City of San Diego Planning Department 1010 Second Avenue, Suite 1200 East Tower, MS-413 San Diego, California 92101

Subject: Mission Trails Regional Park Master Plan Update, City of San Diego, California

Dear Ms. Muto:

The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Wildlife (Department), collectively referred to as the Wildlife Agencies, are providing these additional preliminary comments on the Mission Trails Regional Park (MTRP) Master Plan Update (MPU), following our discussion and meeting with you on December 9, 2016. We have been working with the City of San Diego (City) since 2013 to develop a trails plan as part of the MTRP MPU that provides adequate recreational opportunities while protecting the sensitive resources in the park. Our overall focus is to ensure project consistency with the Multiple Species Conservation Program (MSCP) objectives and the City's MSCP Subarea Plan. We are concerned that the City is moving forward with publication of a Draft Environmental Impact Report (DEIR), including identification of a preferred alternative, in advance of resolving significant wildlife issues repeatedly brought to your attention.

Throughout our discussions on the proposed trail plan for the park, our primary goal has been to ensure that some portions of this large conserved block of habitat, though serving as a regional park, will maintain areas insulated from human access and related sources of disturbances (e.g., hiking, biking). This is important to ensure protected lands support more secretive aspects of larger wildlife species' life history requirements, such as deer fawning areas, bobcat dens, etc. This position is supported by the City of San Diego, Mission Trails Regional Park Open Space Mammal Monitoring and Habitat Assessment Project, Comprehensive Final Report (Western Tracking Institute 2010; Habitat Assessment) that identified several "safe harbor zones" for wildlife that "must be aggressively protected."

We have provided input and written comments on the preliminary trails design in an effort to refine the trails design, including addressing unauthorized trail construction/use in portions of MTRP, and have worked in good faith to agree to trails, including single track trails, loop trails, and 5.62 miles of new trails throughout the park. At the December meeting, the City provided a

Enclosure 2

Enclosure 2 is a copy if the comment letter provided to the City in January 2017 and is incorporated herein by reference. Comments raised in this letter are addressed in responses to the March 2017 comment letter and Enclosure 1.

Ms. Alyssa Muto (FWS/CDFW-SDG-13B0298-17TA0296)

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draft trails plan that includes trails extending into the portion of Oak Canyon on the western side of East Elliot. We previously indicated in a September 11, 2015, email and in meetings that, based on the available information, the Wildlife Agencies do not support this trail due to the sensitivity of wildlife resources in the area.

Specifically, the Habitat Assessment identified the four undercrossings of State Route 52, including the Oak Canyon Bridge, as the only possible safe egress/ingress avenues for terrestrial wildlife at MTRP. The Habitat Assessment also identified areas in proximity to the Oak Canyon Bridge as a safe-harbor zone that provides refuge including breeding areas for all species, concluding that safe-harbor areas must be aggressively protected. The Habitat Assessment emphasizes "Protecting and enhancing safe harbor areas, wildlife movement routes, and movement corridors within MTRP will be vital to its long term success as a wildlife core area within the greater Multiple Species Conservation Program of the City of San Diego."

In addition, the Mission Trails Regional Park Oak Canyon Wildlife Assessment Related to a Proposed Trail Realignment Summary of Findings (Martin 2015; Wildlife Assessment) identified the areas northeast and northwest of the State Route 52 bridge over Oak Canyon as deer hotspots and the floor of the canyon north of the bridge, where there are existing unauthorized trails, as a foraging area (night) and a movement corridor between sensitive habitat areas located northeast and northwest of the bridge. The report acknowledges that this area supports many species and is an important core area for wildlife, in particular providing year round use by deer, including within the canyon bottom. The report concludes that the Oak Canyon trail would avoid the most sensitive wildlife habitat zones and, if managed well, will help support a wide diversity of species.

We agree that the area is an important core area. However, due to the adjacency to protected land on Marine Corps Air Station Miramar, documented very high levels of use by deer and other wildlife, and expectation that this area and the adjoining canyons will support deer fawning, we disagree that a trail through this area sufficiently protects sensitive biological resources in Oak Canyon. Therefore, we do not support a trail through the length of Oak Canyon extending north of SR-52.

At the December meeting, the City agreed to analyze a "no trail" alternative for the Oak Canyon area, although you stated that it will not be included as the preferred alternative within the DEIR. As stated in the meeting, our desire is to reach agreement with the City on a comprehensive trail plan that can be presented as the preferred alternative in the DEIR and to avoid comments through the environmental review process about the inconsistency of the trail plan with the City's Subarea Plan and associated State and Federal permits. Therefore, we request that the DEIR either identify a trail plan agreed to by the Wildlife Agencies as the preferred alternative, or not identify a preferred alternative.

During our meeting, several other areas of concern were addressed for which we have specific recommendations or comments as follows:

Ms. Alyssa Muto (FWS/CDFW-SDG-13B0298-17TA0296)

• The City emphasized it could or would not enforce use restrictions at East Elliott, including nighttime use, is unwilling to install fencing, and could not maintain fencing once installed. In addition, you indicated that the City is reluctant to include enforcement measures such as confiscation of bicycles. We provided examples where the Department successfully enforces fencing and compliance with closed areas in its own lands, such as at Del Mar Mesa, with far fewer resources than those at the disposition of the City. The City's current comments again raise questions as to the City's willingness or ability to effectively manage your MSCP preserve areas (see August 1, 2013, letter from the Wildlife Agencies to the City). To remain in compliance with State and Federal permits for the City's MSCP Subarea Plan, the City must demonstrate the ability to manage the preserve areas in East Elliot, including enforcing trail closures where necessary, to achieve the goals of the MSCP for the covered species addressed by the plan.

- City staff have stated that trail use is not impacting wildlife at MTRP because wildlife is now present despite the current unauthorized use. While trail use may not totally preclude wildlife use of trail areas, it may hinder or alter wildlife behavior and temporal use of the preserves. The Del Mar Mesa Enforcement Project (SANDAG 2015) suggests that the daily wildlife use is correlated with human use and found that once unauthorized trail use was curtailed, a shift in the use of the Del Mar Preserve by wildlife from mostly at night, to morning and evening hours was observed. As the City proceeds with CEQA review, we encourage staff to revisit the trails design proposal and reevaluate the existing literature that examines the effects of recreational activities on altering wildlife movement patterns, particularly within the context of the urban/wildland interface, Some of this literature was provided to you at the December meeting. In addition, it is important for the City to recognize that the basis for accepting MSCP preserve lands as mitigation for impacts to covered species includes the commitment to manage the lands so that habitat conditions for wildlife are sustained or improved and are not degraded by recreational use.
- In previous meetings, the City informed the Wildlife Agencies that it wanted to suspend
 further discussion about the East Elliott core area until it had completed an environmental
 analysis of trail impacts. At the December meeting, the City indicated that the analysis
 was complete but did not share or discuss the results of the analysis. We request to
 review this analysis prior to public review.
- The City indicated that they met specifically with mountain bikers but not with other stakeholders. It is unclear what measures were taken by the City to ensure all stakeholders were informed about meetings or if the City has had discussions with other stakeholders outside of management meetings. In the future, we recommend that the City engage all stakeholders in the preliminary process of trail development to ensure issues are addressed without partiality to any one group.
- The Service and the State of California worked together to purchase lands within East Elliot with grants provided under Section 6 of the Federal Endangered Species Act. The

Ms. Alyssa Muto (FWS/CDFW-SDG-13B0298-17TA0296)

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City proposes to locate trails on or near property that was acquired with Section 6 grants and land that was used by the City to leverage the grants in the East Elliot area. The Wildlife Agencies will need to more closely examine the specific parcels purchased with, or serving as match for, Section 6 funds in order to ensure the trails are consistent with the original grant purposes.

The Wildlife Agencies acknowledge the difficulty in managing preserve lands in MTRP, especially within the East Elliot core area, and we understand the desire to move forward with public review of the DEIR. We are committed to working with the City to resolve these issues prior to release of the draft document. However, if you choose to proceed with release of the document, please anticipate significant comments and objections to any alternative that includes build out of the trail system within Oak Canyon and the southern portion of East Elliot across the Spring Canyon area as shown to us at the December meeting.

If you or your staff would like to meet to discuss the recommendations and comments in this letter, we would do so at our earliest opportunity; please contact Patrick Gower of the Service at 760-431-9440, extension 352, or Paul Schlitt of the Department at 858-637-5510.

Sincerely.

KAREN Distriby Signed by FASEN (EXCEPT).

GOEBEL 17218-78 - 08/00

Karen A. Goebel Assistant Field Supervisor U.S. Fish and Wildlife Service Gail K. Sevrens

Environmental Program Manager California Department of Fish and Wildlife

Literature Cited:

City of San Diego Park and Recreation Department. (2016). Mission Trails Regional Park Master Plan Update. City of San Diego, California.

Martin, B. (2015). Mission Trails Regional Park Oak Canyon Wildlife Assessment Related to a Proposed Trail Realignment Summary of Findings. Prepared for the City of San Diego California, 15 pp.

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Western Tracking Institute. (2010). City of San Diego, Mission Trails Regional Park Open Space Mammal Monitoring and Habitat Assessment Project. Final Report prepared for City of San Diego Open Space Division Park and Recreation. May 2010. 48 pp.

Letter A3



MARK WARDLAW

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March 8, 2017

Myra Herrmann Environmental Planner City of San Diego Planning Department 1010 Second Avenue, MS 413 San Diego, CA 92101

Via email to: PlanningCEQA@sandiego.gov

COMMENTS ON THE CITY OF SAN DIEGO'S PUBLIC NOTICE OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE MISSION TRAILS REGIONAL PARK MASTER PLAN UPDATE/NATURAL RESOURCES MANAGEMENT PLAN/COMMUNITY PLAN TECHNICAL AMENDMENTS PROJECT NUMBER 349988 (PROJECT)

Dear Ms. Herrmann,

A3-1 The County of San Diego (County) has reviewed the City of San Diego's (City) Public Notice of a Draft Program Environmental Impact Report (DPEIR) for the Mission Trails Regional Park Master Plan Update (MPU)/Natural Resources Management Plan (NRMP)/Community Plan Technical Amendments project number 349988 (Project). The County offers the following comments for your consideration.

A3-2 PARKS AND RECREATION

 In the County's 11/3/16 comment letter (Attachment A) to the City, the County's Department of Parks and Recreation (DPR) requested that Section 1.2.1.2 Responsible and Trustee Agencies on pages 1-3 of the DPEIR be updated with the following regarding the County:

"County of San Diego: The County of San Diego Department of Parks and Recreation (DPR) jointly owns 1,400 acres and solely owns 157 acres of the Cowles Mountain area. Coordination with DPR is required for matters including the communication towers, capital improvements, and park maintenance of the Cowles Mountain area. Furthermore, the County Board of Supervisors is the approving body for the Mission Trails Regional

A3-1 Comment noted.

A3-2 Comment noted. The City incorporated several revisions to the Draft PEIR prior to public review in response to the referenced County comments of 11/3/16. Specifically, Section 1.2.1.2 of the Public Review Draft PEIR was revised to include information about the City-County jointly owned, and solely County-owned land within the Cowles Mountain area; information about the role of the County Department of Environmental Health; and information about the required County approvals.

	LETTER		RESPONSE
	Ms. Herrmann March 8, 2017 Page 2		
	Park Master Plan and anticipated projects within the Cowles Mountain area. The Department of Environmental Health (DEH) regulates various public health and hazard issues in San Diego County, including on-site wastewater systems, recreational water, aboveground and underground storage tanks and cleanup, and medical and hazardous materials and waste. Coordination with the DEH is required for projects located within recorded hazardous materials sites."		
	This revision was not included in the latest draft of the DPEIR, specifically with regard to the statement related to the County of San Diego's Board of Supervisors (Board) approval of the Master Plan and anticipated projects. DPR acknowledges that Section 1.5 Required Discretionary Actions of the DPEIR makes this statement (see comment DPR #2 below), but please also add it to Section 1.2.1.2. Please make the aforementioned revisions or provide DPR with an explanation as to why the language was not revised.		
A3-3	After reevaluation of the County's GIS data and the County's mainframe database for acquired/managed properties, it was found that the County acreage in the DPEIR (122 acres) is correct. Please disregard the 157-acre references / acreage confirmation requests in items 2 and 4 of the 11/3/16 comment letter from DPR.	A3-3	Comment noted.
A3-4	 In the 11/3/16 comment letter, DPR requested that Section 1.5 Required Discretionary Actions on page 1-9 of the DPEIR be updated with the following to differentiate between City and County Discretionary Actions: 	A3-4	The referenced text has been revised to state the Project will require County of San Diego Board of Supervisors approval for adoption of the MPU and NRMP".
	"The Project will require County of San Diego Board of Supervisors approval of the following discretionary actions: Adoption of the MPU and associated NRMP."		
	DPR acknowledges that the majority of the requested text was included, as follows:		
	"Additionally, the Project will require County of San Diego Board of Supervisors approval for adoption of the MPU as it relates to the County's jurisdiction in accordance with the Joint Powers Agreement O-18268."		
	However, it is unclear why the NRMP was dropped from the list of discretionary actions to be approved by the Board. Please revise the text in the DPEIR or provide DPR with an explanation for the omission.		
A3-5	3. In the 11/3/16 comment letter, DPR requested that Figure 3-5 in the DPEIR be updated to include land ownership labels to the parcels in the map. Figure 3-5, in the most current version of the DPEIR, includes the municipal boundary and label for the City of Santee, but does not include parcel boundaries or ownership labels. Please include the requested information or provide DPR with an explanation as to why it was omitted.	A3-5	Parcel boundaries and ownership labels were not added to Figure 3-5 because it would have made the figure difficult to interpret, as the primary purpose of the figure is to show the location of proposed trails and how they relate to the MPU recommendations. Rather, the City created a separate figure in Chapter 2 showing the
			land ownership in the Cowles Mountain Area as it represents

area.

information describing the existing condition and setting in this

Ms. Herrmann March 8, 2017 Page 3

A3-7

A3-8

A3-6
4. Item 9 in the 11/3/16 comment letter, DPR requested that the City add "City of San Diego to..." to the beginning of the action in each box on Figure 3-5 (i.e., R1-R7, F1-F8, P1, H1-H4, and M-1) to specify the City's responsibility. In response, the City added a footnote to Figure 3-5 that states:

"The City of San Diego will be responsible for all improvements within the Cowles Mountain area as identified in the Master Plan and per the Joint Powers Agreement with the County of San Diego Regarding the Operation and Maintenance of Tijuana River Valley Park and Mission Trails Regional Park. Any recreational amenity and its management, or subsequent projects proposed within the County owned Cowles Mountain area will require analysis and review by the County on a project by project basis."

DPR recommends replacing the word "improvements" with "improvements, maintenance and management" in order to accurately capture all planning recommendations (i.e., boxes) on Figure 3-5.

5. Please note that the Board is the approving body for the Mission Trails Regional Park Master Plan (Master Plan) and the accompanying PEIR for those areas within the Cowles Mountain area (i.e., County-owned [or jointly owned] land). To that end, the Board was also the approving body for the three (3) Joint Powers Agreements (JPA) between the City and the County for those lands jointly owned – 1) the 1982 JPA between the County and City for development of an electronic communications facility (No. 255972); 2) 1996 JPA between the County and City regarding the operation and maintenance of Tijuana River Valley Park and Mission Trails Regional Park (No. 18268-1); and, 3) the 1996 JPA between the County and City for the operation of Mission Trails Regional Park (No. 18268-2).

As the 1996 JPA is nearing the end of its 25-year term, the City should agree to work with the County to update and renew the JPAs as soon as possible. The County requests that these JPAs be consolidated into one agreement. The reason for the urgency and proposed consolidation is that the Board cannot initiate their review of the Master Plan and PEIR until the agreed upon draft JPA (between the City and County) clearly identifies ownership boundaries and acting responsibilities (e.g., maintenance, management, improvements, etc.) that will be carried forth. To that end, the MPU, PEIR and revised/combined JPA(s) should be brought before the Board concurrently for a comprehensive review and approval.

WATERSHED

 Please ensure that storm water management (e.g., pollutant control and flow control design) for runoff leaving any future project that flows onto the unincorporated portion of the County meet the requirements of the 2013 MS4 Permit Order No. R9-2013-0001, as amended by Order Nos. R9-2015-0001 and R9-2015-0100, as well as the City of San Diego Storm Water Standards Manual.

A3-6 The requested revisions have been made to Figure 3-5 of the Final PEIR.

A3-7 Comment noted. This comment does not reflect the adequacy or accuracy of the environmental document; however, the City intends to work collaboratively with the County to update and renew the JPAs prior to the end of the 25-year term.

A3-8 Comment noted. As detailed in Section 5.8 of the Draft PEIR, the City is obligated to comply with the MS4 Permit for all project types. Future projects implemented in accordance with the MPU would be required to implement all applicable best management practices (BMPs) in accordance with the City's Storm Water Standards as further described in Mitigation Framework Measures MM-HYD/WO-1 and 2.

Ms. Herrmann March 8, 2017 Page 4

A3-9 **VECTOR CONTROL**

A3-10

The County of San Diego Vector Control Program (VCP) is responsible for the protection of public health through the surveillance and control of mosquitoes that are vectors for human disease including West Nile virus (WNV). The VCP has completed their review and has the following comments regarding the proposed project.

- 1. The VCP requests that the DPEIR address potential impacts from possible mosquito breeding sources created by subsequent projects and that these projects be designed and constructed in a manner to minimize those impacts. Specifically, ensure construction-related depressions created by grading activities and vehicle tires, tree pits and landscaping do not result in depressions that will hold standing water. In addition, ensure BMPs, storm water drainage systems, and ponds do not create a potential mosquito breeding source. Any area that is capable of accumulating and holding at least ½ inch of water for more than 96 hours can support mosquito breeding and development. Finally, if habitat remediation is required for the project, the design should be consistent with guidelines for preventing mosquito habitat creation.
- 2. Please note, the VCP has the authority pursuant to state law and County Code to order the abatement of any mosquito breeding that does occur either during construction or after the project is completed that is determined to be a vector breeding public nuisance. The VCP will exert that authority as necessary to protect public health if the project is not designed and constructed to prevent such breeding.
- For your information, the County of San Diego Guidelines for Determining Significance for Vectors can be accessed at http://www.sandieqocounty.gov/content/dam/sdc/pds/docs/vector_quidelines.pdf and the California Department of Public Health Best Management Practices for Mosquito Control in California is available at http://www.cdph.ca.gov/HealthInfo/discond/Documents/BMPforMosquitoControl07-12.pdf.

The County looks forward to receiving future documents and/or notices related to this project and providing additional assistance at your request. If you have any questions regarding these comments, please contact Timothy Vertino, Land Use / Environmental Planner at (858) 495-5468, or via email at timothy.vertino@sdcounty.ca.gov.

JOSEPH FARACE, Group Program Manager

Advance Planning Division

Sincerely.

Planning & Development Services

The project would conform to all applicable County of San Diego A3-9 regulatory requirements, including measures related to agency oversight of public health and vector control. However, since the EIR is programmatic, no site-specific projects or impacts are identified. Prevention of possible mosquito breeding sources would be considered through the implementation of water quality and hydrology standards that would be incorporated on a project-byproject basis. Moreover, the Draft PEIR identifies that trail areas and facilities must incorporate source control and site design BMPs as project design features, and adhere to LID standards. Overall drainage and drainage patterns post-construction would be improved when compared to the existing condition. In addition, the City's performance standards for Construction Storm Water BMPs would apply during construction within the trail areas and facilities. The standards provide (at a minimum) site management, inspection, maintenance, and monitoring of construction BMPs to prevent the accumulation of water in the event of stormy weather, and to deploy emergency BMPs when needed. No changes were made to the Final PEIR in response to this comment.

A3-10 Comment noted.

Attachment A



BRIAN ALBRIGHT DIRECTOR (858) 986-1301 DEPARTMENT OF PARKS AND RECREATION

5500 OVERLAND AVENUE, SUITE 410, SAN DIEGO, CA 92123 Administrative Office (858) 894-3030 www.sdparks.org

November 3, 2016

Alyssa Muto
Deputy Director
Planning Department
City of San Diego Planning Department
1010 Second Ave., MS 413
San Diego, CA 92101

Sent via email to: amuto@sandiego.gov

COMMENTS ON THE MISSION TRAILS REGIONAL PARK MASTER PLAN UPDATE PROGRAMMATIC ENVIRONMENTAL IMPACT REPORT DATED OCTOBER 2016

The County of San Diego Department of Parks and Recreation (County) has received and reviewed the courtesy copy of the Draft Programmatic Environmental Impact Report (Draft PEIR) for the Mission Trails Regional Park Master Plan Update dated October, 2016.

The County has the following comments on the Draft PEIR:

- General comment. Please include reference to the County's joint ownership and interest in the Mission Trails Regional Park, specifically the Cowles Mountain area. Please consider adding a section regarding the County's ownership, Joint Powers Agreements, and past Board approvals of the Mission Trails Regional Park Master Plan.
- Section 1.2.1.2 Responsible and Trustee Agencies, page 1-3. Please update the following regarding the County of San Diego under "Responsible Agencies":
 - a. County of San Diego: The County of San Diego Department of Parks and Recreation (DPR) jointly owns 1,400 acres and solely owns 157 acres of the Cowles Mountain area. Coordination with DPR is required for matters including the communication towers, capital improvements, and park maintenance of the Cowles Mountain area. Furthermore, the County Board of Supervisors is the approving body for the Mission Trails Regional Park Master Plan and anticipated projects within the Cowles Mountain area. The Department of Environmental Health (DEH) regulates various public health and hazard issues in San Diego

CAPRA



County, including on-site wastewater systems, recreational water, aboveground and underground storage tanks and cleanup, and medical and hazardous materials and waste. Coordination with the DEH is required for projects located within recorded hazardous materials sites.

- 3. Section 1.5 Required Discretionary Actions, page 1-9. Please add "The Project will require County of San Diego Board of Supervisors approval of the following discretionary actions: Adoption of the MPU and associated NRMP" in order to differentiate between City and County Discretionary Actions.
- 4. Section 2.2.1.2 Cowles Mountain, page 2-5. Please see changes in bold, meant to clarify the following: "The 1,540-acre Cowles Mountain area is almost entirely within the municipal jurisdiction of the City of San Diego (1,355 acres), with 189 acres in the City of Santee. About 20 acres of land is in City ownership and 120 acres is in County ownership. The remaining 1,400 acres is jointly owned by both agencies." Please check these ownership acreage numbers, as our assessor's parcel acreage shows slightly higher numbers.
- 5. Section 2.2.1.2, page 2-5. It would be beneficial to include a map depicting land ownership of the Cowles Mountain area to supplement the text in this section.
- Section 3.2.2.2, Area Policies, b. Cowles Mountain, page 3-18. Please include language stating that the Cowles Mountain area is jointly City/County owned, and that a portion is fully County owned.
- 7. Section 3.2.2.2, Area Policies, b. Cowles Mountain, page 3-18, last paragraph. Please update the following sentence to include the bolded text: The existing shared City/County communications facilities (receiving/transmitting antennas), service road, and related compound near the summit of Cowles Mountain present a unique challenge.
- 8. Section 3.2.2.2, Area Policies, b. Cowles Mountain, Figure 3-5. Please add land ownership labels to the parcels in the map.
- 9. Figure 3-5, Boxes R1-R17, F1-F8, P1, H1-H-4, M-1. Please add "City of SD to..." to the beginning of the action in each box to specify City responsibility. There are 10 specific actions recommended within the 157acres of County owned land without reference to the responsible party performing these actions. Further discussions/clarification will be necessary before proceeding with Master Plan approvals.
- 10. Table 3-2 page 3-30. Future Actions please add a dot point containing the following:
 - Consultation with County of San Diego for work within County owned or jointly own land.
- 11.As a general comment, please consider adding the following condition where appropriate: If any of the recreational amenities, management actions, or subsequent projects are proposed within the County owned Cowles Mountain area or within/adjacent to County jurisdiction, then an analysis would be required and need to be reviewed by the County on a project by project basis.

The County appreciates the opportunity to participate in the environmental review process for this project. We look forward to receiving any future environmental documents related to this project or providing additional assistance at your request. If you have any questions regarding these comments, please contact Christine A. Tolchin at (858) 966-1370 or email at christine.tolchin@sdcounty.ca.gov.

Sincerely, Mustin S. Polchin

Christine A. Tolchin, Resource Management Division Chief Department of Parks and Recreation

cc's (via email):

Brian Albright, Director, DPR Darren Gretler, Assistant Director, PDS Stephanie Smith, San Diego County Counsel Matt Bohan, District Manager, DPR





4677 Overland Avenue San Diego, California 92123-1233

March 8, 2017

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A4-2

Myra Herrmann Environmental Planner MEMBER AGENCIES City of San Diego Planing Department 1010 Second Ave., MS 413 SHOW SHOWING San Diego, CA 92101 AND ALKSOME

Via email to: PlanningCEQA@sandiego.gov

Comments on Draft Program Environmental Impact Report (PEIR) for the Mission Trails Regional Park Master Plan Update (MPU)/Natural Resources Management Plan/Community Plan **Technical Amendments**

Project No. 349988 / SCH No. 2014041011

Dear Ms. Herrmann:

The San Diego County Water Authority (Water Authority) has reviewed the Draft PEIR for the Mission Trails Regional Park MPU, as well as the Mission Trails Regional Park MPU, Natural Resources Management Plan and Community Plan Technical Amendments. The Water Authority offers the following comments for your consideration.

GENERAL COMMENTS:

- The MPU should be edited in several places to clarify that lands owned by the Water Authority are not part of the MTRP, and that they are not governed by the
- The multi-species conservation plan discussion section please identify the Water Authority's and SDG&E's NCCP/HCP, and state that activities authorized via those plans are implemented per those plans and may or may not be consistent with all provisions of the Mission Trails MPU.
- Comment noted. Figure 3-6 of the MPU identifies the various A4-1 ownerships within the project boundaries. Additionally, the Draft PEIR addresses land ownership within Section 2.0 Environmental Setting.
- A4-2 Comment noted. The Final PEIR, Section 5.1.2 was revised to add a section discussing the NCCP/HCPs for SDCWA and SDG&E. Refer to section 5.1.2.10. Additionally, a statement about both plans was added to the Final PEIR in Section 5.1.4, under Issue 3.

A public agency providing a safe and reliable water supply to the San Diego region

Whereoverstein

Myra Harmon March 08, 2017 Page 2

A4-3 SPECIFIC COMMENTS:

Section 6.1.1.4. Mitigation / Supplemental Environmental Projects
 Background, pg. 6-3, please revise the text to add the underlined text inserted below:

Mitigation requirements and Supplemental Environmental Projects (SEPs) shall be used for land acquisitions, habitat creation, or environmental enhancements throughout MTRP.

City of San Diego Departments can conduct mitigation projects within MTRP for environmental impacts occurring inside or outside of MTRP.

Other public agencies, such as SDG&E and SDCWA, can conduct mitigation projects within MTRP for environmental impacts that occur within MTRP only. They shall not be allowed to use City-owned lands currently within MTRP as mitigation for environmental impacts elsewhere within the county.

Again, thank you for the opportunity to comment. Please retain the Water Authority on your mailing list to receive the Final PEIR and other information concerning this project. If you have any questions regarding these comments, please contact Mark Tegio (858-522-6753/mtegio@sdcwa.org).

Sincerely,

Mary Putnam

Principal Water Resources Specialist

A4-3 Comment noted. The requested edit has been forwarded to the Project Manager for inclusion in the MPU.

Letter A5



Hilary Haskell Environmental Specialist 8315 Century Park Court CP21E San Diego, CA 92123 (O) 858-654-1239 (M) 714-225-4451

February 23, 2017

Myra Herrmann, Environmental Planner City of San Diego Planning Department 1010 Second Avenue, Suite 1200 East Tower, M.S. 413 San Diego, CA 92101

RE: Comments on the Draft Program Environmental Impact Report (PEIR) for the Mission Trails Regional Park Master Plan Update/Natural Resources Management Plan/Community Plan Technical Amendments Project No. 349988/ SCH No. 201404011

A5-1 Dear Ms. Herrmann:

San Diego Gas & Electric Company (SDG&E) appreciates the opportunity to comment on the abovereferenced Draft PEIR per the Notice of Availability for this document that was issued on January 20, 2017.
SDG&E is a utility regulated by the California Public Utilities Commission (CPUC) that provides electric and
gas services to customers throughout San Diego, Orange, and Imperial counties. The CPUC mandates that
SDG&E maintain its utility infrastructure. SDG&E wants to ensure that the Final PEIR adequately addresses
the public utility implications of the Mission Trails Regional Park Master Plan Update (MPU)/Natural
Resources Management Plan (NRMP)/Community Plan Technical Amendments (Proposed Project).

- A5-2 In Section 2.0, Environmental Setting, the Draft PEIR discusses how many of the trails in Mission Trails Regional Park utilize utility access roads. Please note that access to electric and gas transmission or distribution facilities must be provided during and after construction or improvements considered by the MPU and NRMP. While some roads/trails may appear to be redundant, it is important to coordinate closely with SDG&E before considering the potential removal or abandonment of access and spur roads within the Mission Trails Regional Park. Access and through access, to and along the rights of way, is required on a 24-hour basis to all SDG&E facilities, structures, and anchors for patrol, maintenance, and emergency vehicles. Landscaping, revegetation, and/or habitat enhancement plans for the Proposed Project shall not inhibit SDG&E's access to facilities for purposes including, but not limited to, construction, upgrading, repair, operation, or maintenance. All project mitigation measures are to be placed outside of the right of way, access roads, and maintenance pads, as applicable.
- A5-3 On page 5.13-1 of the Draft PEIR under 5.13.1, Regulatory Framework, the document indicates there are no applicable state regulations. However, General Order 131-D (GO 131-D) would be applicable in the event that any electric transmission facilities and/or substations would require relocation or modification, and subsequent environmental review may be required. SDG&E requests that the Final PEIR include this regulation under 5.13.1.
- A5-4 Appendix I of the Draft PEIR, Utilities Easement Review, lists two substations (East Elliott and Sycamore) as the interconnection points for electrical lines that cross Mission Trails Regional Park. The Utilities Easement Review lists Carlton Hills Substation as only providing an interconnection source if it is acquired. Please clarify what is meant by "acquired" in this context, as page 5.13-4 of the Draft PEIR as well as Figure 5.13-1, Major Utilities, appear to take Carlton Hills Substation into consideration. SDG&E would like to ensure that this 138kV substation was considered in the analysis with regards to existing capacity and any potential need for expansion.

A5-1 Comment noted.

- A5-2 Comment noted. As detailed in Section 5.13.3b. of the Draft PEIR, the document recognizes that SDG&E electrical transmission lines and a high-pressure gas line traverse portions of the Park and that implementation of the MPU recommendations would not require disturbance or alteration to these facilities. Any changes or alterations to the SDG&E facilities within the Park would need to be coordinated and executed by SDG&E and would require a separate environmental review. The City recognizes that SDG&E requires access to its facilities throughout the Park and implementation of the Plans would allow for continued access to SDG&E facilities to allow for construction, upgrading, repair, operation, and maintenance as requested. However, the City notes that implementation of the MPU recommendations could result in improvements to existing access roads to address erosion or other issues. Implementation of such improvements would be coordinated with SDG&E to ensure there is no disruption to SDG&E facilities.
- A5-3 Comment noted. The requested information has been added to the Final PEIR.
- A5-4 The term "acquired" is a misnomer in the referenced report, as 100 percent of the West Sycamore area is under the ownership of the City of San Diego. The term may be a reference to the fact that the West Sycamore area is a proposed expansion area that would be added into the Park boundaries. The City appropriately recognizes and considers the Carlton Hills Substation in the Draft PEIR.

Page 2 of 2

- A5-5

 Any changes in grade or surfacing to access roads and terrain in support of initiatives related to the Proposed Project shall not direct drainage in a manner that increases the potential for erosion around SDG&E facilities and access roads. Access roads and project grading proposed within the Park in support of the MPU must comply with SDG&E Guldelines for encroachment into rights of way. Additionally, grading within SDG&E rights of way require a "permission to grade letter" to ensure the proposed project is reviewed by SDG&E and ensure continued compliance with state and federally mandated access standards. Project grades shall be coordinated to assure clearances as required by CPUC General Order 95. Any improvements above or below ground and/or adjacent to SDG&E rights of way requires compliance with CAL OSHA and/ or the rules for Overhead Electric Line Construction, General Order No. 95 and Underground Electric Line Construction General Order No. 128 during the construction and maintenance of those facilities. Grading plans and site development plans associated with subsequent projects (and geotechnical reports, if applicable), signed and dated, for SDG&E's review, must be submitted.
- A5-6

 In addition, SDG&E requests the opportunity to review future environmental documents and subsequent discretionary permits associated with specific project applications for subsequent projects identified in the MPU or NRMP. SDG&E has existing facilities within and in the vicinity of Mission Trails Regional Park (transmission and distribution lines, substations, etc.), and would like to note that future improvements to these facilities, planned and unplanned, may be required (such as new pipelines or transmission lines), due to regional needs. Please note that any temporary or permanent relocation of facilities, placement of facilities, or temporary outages shall be completed at the cost of the Applicant.
- A5-7 SDG&E thanks you for this opportunity to comment on the Draft PEIR for the Mission Trails Regional Park MPU/NRMP/Community Plan Technical Amendments. If you have any questions, feel free to contact me at 858-654-1239 or at hhaskell@semprautilities.com.

Sincerely

Hffary Haskell // Environmental Specialist

San Diego Gas & Electric Company

CC

Edalia Olivo-Gomez, Team Lead Land Planning, SDG&E

- A5-5 Comment noted. One of the overall goals of the Plan is to minimize and address existing eroded trails and access roads. Where activities authorized under the Plans could encroach into the SDG&E right of way, a "permission to grade letter" would be obtained from SDG&E and project activities would be coordinated with SDG&E to ensure compliance with SDG&E Guidelines and all applicable regulations referenced in the comments.
- A5-6 Comment noted. Future activities within the Park would be coordinated with SDG&E where activities would be within SDG&E right of way or have the potential to affect access roads or other facilities.
- A5-7 Comment noted.

Letter B1



March 5, 2017

Alyssa M. Muto Deputy Director of Environment & Policy Analysis City of San Diego Planning Department 1010 Second Avenue, Suite 1200 East Tower, MS-413 San Diego, California 92101

SUBJECT: REVIEW OF BIOLOGICAL RESOURCE ISSUES IN THE
DRAFT PROGRAMMATIC EIR
MISSION TRAILS REGIONAL PARK MASTER PLAN UPDATE
CITY OF SAN DIEGO, SAN DIEGO COUNTY, CALIFORNIA

Dear Ms. Muto,

B1-1

On behalf of the Endangered Habitats League, Hamilton Biological has reviewed the Draft Programmatic EIR (DPEIR) for the Mission Trails Regional Park (MTRP) Master Plan Update (MPU) in the City of San Diego (City). Hamilton Biological is a consultancy specializing in field reconnaissance, regulatory compliance, preparing CEQA documentation, and providing third-party review of CEQA documentation. Please refer to the attached curriculum vitae.

The purpose of this review is to (a) identify any areas in which the document reaches conclusions not supported by adequate field work or review of the scientific literature; (b) identify and discuss any biological impact analyses not consistent with CEQA, its guidelines, or relevant precedents; (c) evaluate whether the proposed project satisfies the requirements of the City of San Diego Multiple Species Conservation Plan (MSCP) Subarea Plan (SAP); and (d) recommend changes to impact analyses, mitigation measures, and/or resource management practices so as to avoid or minimize to the maximum extent practicable any potentially significant impacts to biological resources, as required under CEQA.

In conjunction with my review, I also referred to the following relevant documents:

- Multiple Species Conservation Program. City of San Diego MSCP Subarea Plan, and Implementation Agreement. March 1997.
- A series of four letters submitted to the City of San Diego Planning Dept., prepared by the US Fish & Wildlife Service (USFWS) and California Dept. of Fish & Wildlife (CDFW), concerning the proposed project and previous iterations. The four letters,

316 Monrovia Avenue Vong Beach, CA 90803 562-477-2181 robb@hamiltonbiological.com

B1-1 Comment noted.

Comments on DPEIR for the Mission Trails Regional Park MPU March 5, 2017

l lamilton Biological, Inc. Page 2 of 9

included as attachments to this comment letter, are dated May 24, 2013; August 1, 2013; April 1, 2014; and January 20, 2017.

- Western Tracking Institute. 2010. City of San Diego, Mission Trails Regional Park
 Open Space Mammal Monitoring and Habitat Assessment Project. Comprehensive
 Final Report, dated May 2010, prepared for City of San Diego Open Space Division
 Park and Recreation.
- Martin, B. undated. Mission Trails Regional Park, Oak Canyon Wildlife Assessment Related to a Proposed Trails Realignment, Summary of Findings. Report on field work conducted in December 2015 and February 2016, prepared for the City of San Diego California.
- Article by Marty Graham in the San Diego Reader dated January 12, 2014, entitled "Protest over Mission Trails Mountain-bike Trail Closures; Letter from state and fed agencies brings hammer down." http://www.sandiegoreader.com/news/2014/jan/12/stringers-protest-over-mission-trail-mountain-bike/#

B1-2 RELATIONSHIP OF PROPOSED PROJECT TO MSCP SUBAREA PLAN

Mission Trails Regional Park (MTRP) is covered under City of San Diego MSCP Subarea Plan (SAP). In exchange for benefits that come from being covered under the MSCP, the City has made certain obligations. For example, Section 9.19 of the Implementation Plan for the SAP states:

Duty to Enforce. THE CITY OF SAN DIEGO agrees to take appropriate actions to enforce the terms of the Take Authorizations, the Subarea Plan, and this Agreement as to itself and to all persons or entities subject to the requirements established by this Agreement, specifically including the land development permitting and approval requirements set forth in Section 10 of this Agreement. Furthermore, consistent with Section 9.3 of this Agreement THE CITY OF SAN DIEGO shall exercise the full extent of its legal authority to ensure that its local share of lands identified for preservation under the Subarea Plan are conserved in perpetuity. Notwithstanding the term of this Agreement, if at any time following the end of the term of this Agreement THE CITY OF SAN DIEGO proposes to exercise its discretionary authority to modify the regulatory protections or legal encumbrances provided for such lands under the Subarea Plan, the proposed modifications must be accomplished through a public process in which the public, the USFWS and CDFG receive advance notice and the opportunity to comment, and must be consistent with the MSCP Plan and the Subarea Plan such that there is no net loss of habitat value or acreage for the Covered Species. THE CITY OF SAN DIEGO must promptly notify USFWS and CDFG or their respective successor agencies of such proposed modifications in advance, and explain how they achieve such consistency. [Emphasis added.]

Page 5.1-6 of the DPEIR states:

Management priorities to be undertaken by the City as part of its MSCP implementation requirements are also included in this section of the Subarea Plan. Those actions identified as Priority 1 are required to be implemented by the City as a condition of the MSCP Take Authorization to ensure that covered species are adequately protected. The actions identified as Priority 2 may be undertaken by the City as resources permit. [Emphasis added.]

B1-2 Comment noted. Compliance with all relevant requirements of the MSCP SAP would be assured through the subsequent project review process through implementation of the NRMP.

Comments on DPEIR for the Mission Trails Regional Park MPU March 5, 2017 Hamilton Biological, Inc. Page 3 of 9

Page 5.5-3 of the DPEIR states:

The MSCP includes management priorities to be undertaken by the City as part of its MSCP implementation requirements. Those actions identified as Priority 1 are required to be implemented by the City as a condition of the MSCP Take Authorization to ensure that covered species are adequately protected. The actions identified as Priority 2 may be undertaken by the City as resources permit. Section 1.5.2 of the City's Subarea Plan provides general management directives which apply to all areas within the MHPA [Multi-Habitat Planning Area]. These general directives provide guidance on access and recreation within open space areas, including the Park. Priority directives include:

- Install sufficient signage and barriers identifying access to the MHPA;
- · Locate trails, overlooks, and staging areas in least-sensitive areas in MHPA;
- Avoid paving trails;
- · Minimize recreational trail widths:
- · Limit equestrian trails near sensitive resources;
- Prohibit recreational off-road and cross county access to MHPA;
- · Remove homeless camps from habitat areas; and
- · Regularly maintain equestrian trails to remove manure.

Although the DPEIR calls these "priority directives," no such category exists in the MSCP SAP. The bullet-points listed above summarize the **Priority 1** directives for Public Access, Trails, and Recreation, listed on Pages 52–53 of the Framework Management Plan (Section 1.5 of the MSCP SAP). The City is *required* to implement all of these Priority 1 directives as a condition of the City's MSCP Take Authorization.

B1-3 EXPRESSED CONCERNS OF THE WILDLIFE AGENCIES

In a series of four letters issued in recent years, the USFWS and CDFW (collectively referred to as the Wildlife Agencies) have repeatedly expressed serious concerns with the City's approach to resource management at MTRP, and have provided guidance on how, in their view, the City can fulfill its requirements to manage this area consistent with the MSCP SAP. To briefly summarize:

• The letter of May 14, 2013, stated that the MTRP planning area "is located within a SAP core biological resource area" and discussed the City's obligations to manage this area in a manner consistent with both the MSCP and the City's General Plan Update (Recreation Element and Conservation Element). This letter includes a table outlining the relevant requirements, all of which the City has agreed to and is obligated to fulfill.

B1-3 Comment noted. Responses to comments made by the Wildlife Agencies in their letter dated January 20, 2017 was included as "Enclosure 2", and restated in their letter dated March 15, 2017 which was submitted during public review of the DEIR. See Response to Comments A2-4 through A2-7.

Comments on DPEIR for the Mission Trails Regional Park MPU March 5, 2017

Hamilton Biological, Inc. Page 4 of 9

- The letter of August 13, 2013, noted that the construction and use of unauthorized trails had "far exceeded" the level of impact anticipated by the MSCP and did not qualify as a "compatible use" under terms of the SAP. The letter noted that "MTRP is a core biological area and regional wildlife corridor within the Multi-Habitat Planning Area (MHPA) established by the City's SAP and is managed to achieve the goals of the MSCP." The Wildlife Agencies warned that these functions were being compromised, and questioned the City's ability to effectively manage the area's biological resources in MTRP per conditions of the City's SAP and Implementing Agreement. Of particular concern were the unauthorized construction and use of trails and the lack of routine patrols and ability to enforce trail regulations within the East Elliot core area.
- The letter of April 1, 2014, identified feasible measures to address unauthorized trail construction/use, while focusing on the requirement to achieve project consistency with the MSCP and SAP). The letter included several aerial photo-based maps showing draft trail designs that would meet project objectives while also achieving consistency with the MSCP and SAP. Whereas these draft designs were generally consistent with the Priority 1 management directive that no new trails should be cut through existing habitat, the "did include limited segments of new trails that would generally replace existing unauthorized trails that the City has deemed unstable/unsafe and allow for functional loops."
- The letter of January 20, 2017, expressed ongoing concern that the plan detailed in the PDEIR would not satisfy the basic requirements of the MSCP and SAP, in that it would not maintain adequate areas insulated from human access and related sources of disturbances. The letter cites relevant findings from a 2010 Habitat Assessment prepared by the Western Tracking Institute, and refers to the Wildlife Agencies' previous extensive input into the planning of trails at MTRP. The agencies noted that they "have worked in good faith to agree to trails, including single track trails, loop trails, and 5.62 miles of new trails throughout the park." The agencies also pointed out that the Preferred Alternative identified in the DPEIR is not the alternative preferred by the USFWS and CDFW, and noted that they had requested that the DPEIR not identify a Preferred Alternative, so as "to avoid comments through the environmental review process about the inconsistency of the trail plan with the City's Subarea Plan and associated State and Federal permits."

B1-4 In their first two letters, the Wildlife Agencies (i.e., "MCSP planners") described several ways in which they have perceived the City as reneging on some of the MSCP's most basic requirements at MTRP. The third letter identified ways the City could address their concerns. The fourth letter, issued the same day as the DPEIR was released, notified City planners that they may "anticipate significant comments and objections to any alternative that includes build out of the trail system within Oak Canyon and the southern portion of East Elliot across the Spring Canyon area."

B1-4 See Response to Comment A2-4.

Comments on DPEIR for the Mission Trails Regional Park MPU March 5, 2017

Hamilton Biological, Inc. Page 5 of 9

Page 70 of the MSCP SAP, under the heading of "Overall Management Policies and Directives for the Eastern Area," states:

Where potential inconsistencies between the Mission Trails Regional Park Master Plan and the MSCP occur, resolution will be made by the existing park decisionmaking bodies after consultation with MSCP planners.

Given the park's status as an important "core biological resource area," failure to enact or enforce key aspects of the SAP at MTRP would call into serious question the legitimacy of the MSCP as a valid form of conservation planning designed to mitigate for impacts allowed outside the reserve boundaries. An overarching goal of this review of the DPEIR is to evaluate the extent to which project biologists have addressed or rebutted various concerns expressed by the Wildlife Agencies in their letters to the City.

B1-5 PROJECT DESCRIPTION

Page 3-1 of the PDEIR states:

The Project analyzed in this Draft Program Environmental Impact Report (PEIR) comprises the implementation of the Master Plan Update (MPU) and Natural Resources Management Plan (NRMP) (collectively, the Plans) for the Mission Trails Regional Park (Park), as well as several discretionary actions listed in Table 3-1.

Page 3-2 states:

The NRMP sets forth adaptive management actions to ensure long-term, viable populations of sensitive species and habitats within the Park. It also sets forth protocols (e.g., data collection methods, success criteria) to evaluate the effectiveness of these management actions. The NRMP fulfills a requirement identified in the City of San Diego's (City's) Multiple Species Conservation Program (MSCP) Subarea Plan to set forth an adaptive management framework in order to protect sensitive biological resources at the Park.

The NRMP fulfills *one* requirement of the MSCP's Subarea Plan (SAP). Priority 1 directive #2 in the Framework Management Plan requires that all "trails, view overlooks, and staging areas" be situated "in the least sensitive areas of the MHPA." As discussed in the letters from the Wildlife Agencies, the design of the trail system in certain parts of MTRP (specifically, Oak Canyon and the southern portion of East Elliot across the Spring Canyon area) would not satisfy this requirement, in that it would not maintain adequate areas insulated from human access and related sources of disturbances.

If the Park's trail system is inconsistent with sound reserve-design principles, it will not be possible for any adaptive management program to "ensure long-term, viable populations of sensitive species and habitats within the Park."

B1-6 In addition to those items listed on Pages 3-2 and 3-3 of the DPEIR, the specific Project Objectives should include "satisfying all mandatory requirements of the SAP and its Framework Management Plan."

- B1-5 See Response to Comment A2-4. Additionally, the NRMP also fulfills the requirement of the MSCP Implementing Agreement Section 10.6.B Preserve Management Program to prepare area-specific management directives, which shall be prepared in a phased manner for logical and discrete areas of land within the Subarea as those lands are committed to permanent preservation.
- B1-6 The MPU and NRMP (Plans) are intended to work in concert with each other to provide the tools necessary to balance resource management and the need for recreational opportunities ensuring that implementation does not negatively degrade the core biological resources in the Park. Additionally, recommendations and management requirements contained in the NRMP have been developed to ensure compliance with the goals and requirements of the MSCP Subarea Plan. Furthermore, subsequent projects implemented in accordance with the Plans would be subject to review in accordance with the ESL Regulations and the Mitigation Framework adopted in conjunction with this project. Compliance with all relevant requirements of the MSCP Subarea Plan would be assured through the subsequent project review process.

Pursuant to CEQA Guidelines Section 15064.7, individual public agencies are encouraged to develop their own sets of significance thresholds that are adopted for general use as part of each agency's environmental review process. The thresholds of significance used throughout the MTRP PEIR are based on the City's Significance Determination Thresholds adopted in 2016. It should be noted that the CEQA Checklist Appendix G does not apply where an agency has adopted its own thresholds, as is the case for the City of San Diego. As such, a threshold related to conflicts with adopted conservation plans is not missing from the PEIR.

Comments on IDPFIR for the Mission Trails Regional Park MPU March 5, 2017

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INCOMPLETE SIGNIFICANCE THRESHOLDS

Per Appendix G of the CEQA guidelines, any project actions that "conflict with the provisions of an adopted Habitat Conservation Plan, Natural Conservation Community Plan, or other approved local, regional, or state habitat conservation plan" represent a potentially significant impact. The CEQA mandate that project actions comply with these requirements is missing from the significance thresholds identified in the Biological Resources section of the DPEIR.

The DPEIR does, however, make reference to MSCP consistency, in Section 5.1 (Land B1-7 Use). Specifically, Page 5.1-32 states, "Implementation of the Plans would support the goals of the MSCP Subarea Plan and support implementation of the MSCP Subarea Plan. Thus, potential impacts related to consistency with the MSCP Subarea Plan would be less than significant." The vague claim that project implementation would "support" the goals and implementation of the SAP falls short of the necessary conclusion, which is that the Plans would comply with all mandatory requirements of the SAP and its Framework Management Plan. As discussed previously in this letter, the federal and State agencies responsible for partnering with the City to ensure proper implementation of the MSCP are on record concluding that the DPEIR's resource management approach would not comply with all requirements. To demonstrate CEQA compliance, the City should (a) carefully evaluate each of their partner agencies' concerns, and (b) convincingly explain the City's factual basis for reaching a different conclusion than has been reached by those agencies. I did not find such an evaluation and explanation in the DPFIR.

B1-8 EVALUATION OF REDUCED PROJECT ALTERNATIVE

Page 22 of the City of San Diego, Mission Trails Regional Park Open Space Mammal Monitoring and Habitat Assessment Project, Comprehensive Final Report (Western Tracking Institute 2010) states:

For our purposes in this study, "Safe Harbor Zones" include those areas that are sufficiently isolated topographically and provide the necessary elements of basic cover, water, and forage so that dens, birthing areas, and beds are likely. We identified several such areas during the survey and they are depicted in Figure 7, page 24. These include a variety of areas mainly within the side canyons that run away from the east and west sides of the North Fortuna and South Fortuna ridgelines, especially in the finger canyons within the triangular areab ordered by the North Fortuna, Fortuna Saddle and North Perimeter Trails where we documented a deer "hot spot" area of high activity.

Incorporating input from the Wildlife Agencies, the Reduced Project Alternative evaluated in the DPEIR would remove the proposed Sycamore Canyon connection and the trail alignment extending along the Park's western boundary. It is highly relevant that, to comply with the MSCP, all trails, overlooks, and staging areas are required to be situated in the "least-sensitive areas" of the MHPA. The Wildlife Agencies have repeatedly asserted that the DPEIR's preferred alternative would result in unacceptably high levels of human intrusion into highly sensitive areas identified through habitat as-

B1-7 Issues related to project consistency with the MSCP Subarea Plan are analyzed thoroughly under Issue 3 within the Land Use Section (Section 5.1) of the PEIR. Specifically, overall recommendations of the MPU directly reflect the goals of the MSCP Subarea Plan including adoption of an NRMP. Additionally, this section of the PEIR also includes an MHPA consistency analysis specific to Land Use Compatibility, Land Use Adjacency Guidelines, and applicable Management Directives. The analysis determined that the Plans are consistent with the General Management Directives of the MHPA and the Specific Directives for the Park as outlined in the MSCP Subarea Plan and therefore, with implementation of Mitigation Measure LU-1, impacts associated with future projects would be reduced to below of level of significance.

B1-8 See Response to Comment A2-4.

Comments on DPEIR for the Mission Trails Regional Park MPU March 5, 2017

Hamilton Biological, Inc. Page 7 of 9

sessment studies (see the attached letters), and thus fail to satisfy the MSCP requirement that all trails, overlooks, and staging areas be situated in the least-sensitive areas.

B1-9 The DPEIR describes the Reduces Project Alternative on Page 10-7:

The Wildlife Agencies requested the removal of these trail components to protect existing intact habitat, decrease the potential for the incursion of exotics species, and avoid disruption of wildlife movement, restriction of wildlife refuge areas, and negative effects to wildlife composition. Similarly, the Wildlife Agencies requested removal of the trail alignment that would pass through the Oak Canyon/State Route 52 area due to the potential for human-caused habitat disturbances to alter wildlife movement through this area. The Reduced Project Alternative would also remove the proposed east-west trail alignment south of Sycamore Landfill and would result in a reduction of associated trail amenities due to elimination of trails. The smaller footprint of the Reduced Project Alternative would reduce the amount of recreational use areas that would be constructed compared to the Project and increase the amount of land preserved as natural habitat.

Page 10-7 of the DPEIR concludes that the Reduced Project Alternative "would result in similar impacts as the Project, but the overall acreage of land disturbance would be reduced due to the lesser amount of development." Then Page 10-8 states;

Implementation of the Reduced Project Alternative would reduce impacts on biological resources compared to the MPU. Under this Alternative, construction of fewer trails and associated amenities would in turn decrease the potential for impacts on sensitive species. Additionally, the reduction in trails would reduce impacts associated with habitat fragmentation and disruption of wildlife movement. The elimination of the trail alignment that would pass through the Oak Canyon/State Route 52 area would reduce potential human-caused habitat disturbances that could affect wildlife movement through this area since [sic]. Use of recreational facilities would be further minimized, thus reducing the potential for indirect biological impacts. The Reduced Project Alternative would result in significant impacts, the same as the project, and would be subject to the same mitigation measures identified in Section 5.5. Overall, impacts would be slightly reduced compared to the Project.

Contrary to the implication of this statement, the impacts of the Reduced Project Alternative would not be "the same as the project." This alternative may also entail significant impacts to biological resources, but in the opinion of the Wildlife Agencies implementing this alternative would substantially lessen those impacts. As stated on Page 1 of their letter to the City dated January 20, 2017:

Throughout our discussions on the proposed trail plan for the park, our primary goal has been to ensure that some portions of this large conserved block of habitat, though serving as a regional park, will maintain areas insulated from human access and related sources of disturbances (e.g., hiking, biking). This is important to ensure protected lands support more secretive aspects of larger wildlife species' life history requirements, such as deer fawning areas, bobcat dens, etc. This position is supported by the City of San Diego, Mission Trails Regional Park Open Space Mammal Monitoring and Habitat Assessment Project, Comprehensive Final Report (Western Tracking Institute 2010; Habitat Assessment) that identified several "safe harbor zones" for wildlife that "must be aggressively protected."

Section 15126.6(a) of the CEQA Guidelines requires the lead agency to provide meaningful analysis of alternatives that "would feasibly attain most of the basic objectives of

B1-9 See Responses to Comments A2-9 and A2-44. Additionally, the alternatives included in the PEIR were selected for comparison because they would attain most of the basic project objectives and avoid or substantially lessen one or more significant effects of the project. This comparison, as required under CEQA Guidelines Section 15126.6, provides a reasonable range of alternatives to permit an informed and reasoned choice by the lead agency and allows for meaningful public participation in the future decision-making process.

Comments on DPEIR for the Mission Trails Regional Park MPU March 5, 2017

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the project, but would avoid or substantially lessen any of the significant effects of the project." Section 15126.6(b) requires the lead agency to "focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly."

Thus the Guidelines do not require a viable alternative to completely avoid all significant impacts, or to completely satisfy all of the project objectives. The City has not provided an adequate level of analysis to demonstrate that significant impacts to biological resources would not be "substantially lessened" under the Reduced Project Alternative recommended by the Wildlife Agencies.

B1-10 MITIGATION FOR INVASIVE PLANT IMPACTS

Page 5.5-40 of the DPEIR states:

Invasive plants thrive in areas disturbed by activities such as grading, construction, trail usage, and fire. Therefore, as subsequent projects implemented in accordance with the MPU would involve trail construction, realignments, and closures, there would be the potential to introduce non-native plant species within sensitive habitats. These impacts would be significant (Impact BIO-6).

To address this significant impact, the DPEIR refers to MM-LU-1 (in the Land Use section), but MM-LU-1 provides no specific guidance for how significant impacts related to invasion of exotic plants might be reduced to less than significant. The measure simply reiterates that subsequent projects should comply with Section 1.4 Land Use Considerations and Section 1.5 Framework Management Plan of the MSCP. Since the MSCP is a pre-existing plan incorporated into the baseline for the DPEIR, identifying a significant impact for the current project but then simply referring back to the MSCP for mitigation represents a circular argument. Given that the Wildlife Agencies are on record arguing that the DPEIR's approach to resource management is not consistent with the MSCP SAP, the DPEIR should be identifying specific measures to address significant impacts in order to demonstrate CEQA compliance.

B1-11 With regard to invasive plants, the Orange County chapter of the California Native Plant Society (CNPS) is pioneering an early detection and rapid response program designed to prevent degradation of natural open spaces by new invasive plant species that have started showing up in the region's open spaces in recent years. As described at https://occnps.org/invasives/what-is-edrr.html:

Early Detection and Rapid Response (EDRR) is a management approach that capitalizes on our ability to most effectively eradicate invasive plant populations when they are small. By detecting a new invasive plant before it has a chance to spread or build a large seed bank, managers can respond early enough in the invasion process to fully eradicate the species from a given area. Through EDRR, well-informed surveillance can avoid costly long-term control efforts.

Impact LU-1 (PEIR Page 5.1-32) identifies that the project could B1-10 result in significant impacts due to the additional recreational uses introduced within or adjacent to the MHPA, which includes potential secondary effects associated with the introduction of exotic plant species. The PEIR includes a Mitigation Framework (MM-LU-1) which provides measures to be implemented by future projects to reduce this potential impact. Regulatory compliance as a means to reduce impacts is adequate mitigation under CEQA as it represents consistent and enforceable means to mitigate an impact (CEQA Section 15126.4). Additionally, Mitigation Framework adopted in conjunction with the Plans specifically includes a measure for subsequent projects requiring compliance with the MSCP Subarea Plan MHPA Land Use Adjacency Guidelines, which disallows the introduction of invasive nonnative plant species within areas adjacent to the MHPA.

B1-11 Comment noted. The PEIR provides adequate mitigation measures to protect against the introduction of invasive plant species within the MHPA. Additionally, the City participated in the development of the *Management Priorities for Invasive Non-native Plants: A Strategy for Regional Implementation*, San Diego County, California (Prepared for SANDAG by Dendra Inc. September 2012), and has been included in the implementation of its "early detection with rapid response" program (currently funded by SANDAG). The City's Open Space Division also includes a team of three dedicated herbicide applicators and numerous additional park rangers with Qualified Applicator Certifications to apply herbicide to quickly address invasive species issues. Reference for this strategy can be found at the following website:

https://consbio.org/products/reports/management-prioritiesinvasive-non-native-plants

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Additional information on this management approach can be found at www.occnps.org/invasives/32-information/337-emergent-invasive-plantmanagement-program.html.

The requirement to implement such a program would represent an actual, pro-active measure that would address the significant impact identified in the DPEIR.

B1-12 SUMMARY AND CONCLUSION

Priority 1 directive #2 in the Framework Management Plan mandates that all "trails, view overlooks, and staging areas" be situated "in the least sensitive areas of the MHPA." The DPEIR does not provide adequate, detailed arguments explaining the ways in which the trail network avoids all but the "least sensitive areas of the MHPA." Citing tracking studies conducted in the project area, the Wildlife Agencies have indicated that the trail network proposed in the DPEIR would fail to comply with this requirement of the MSCP, which could result in revocation of the City's Take Authorization under the MSCP.

The Reduced Project Alternative briefly evaluated in the DPEIR incorporates recommendations of the Wildlife Agencies. The attached letters from these agencies indicate that, based upon tracking studies, implementation of the Reduced Project Alternative would substantially lessen the project's significant impacts upon biological resources. The DPEIR has not provided adequate analysis to substantiate its conclusion that impacts from this alternative would be only "slightly reduced compared to the Project."

Finally, it is recommended that the City consider adopting a rapid response program to detect and eradicate invasive exotic weeds along trails before they become well-established in the project area.

I appreciate the opportunity to provide these comments on the DPEIR and I look forward to the City's responses. If you have questions, please call me at (562) 477-2181 or send e-mail to robb@hamiltonbiological.com.

Sincerely,

Robert A. Hamilton

Robert Alamelton

President, Hamilton Biological, Inc.

B1-13 attachments: curriculum vitae

four letters from Wildlife Agencies (5/24/13; 8/1/13; 4/1/14; 1/20/17)

cc: Patrick Gower, USFWS Paul Schlitt, CDFW

Dan Silver, Endangered Habitats League

B1-12 Comment noted. See Responses to Comments B1-1 through B1-11.

B1-13 Attachments included for reference only. No response is required.

Robert A. Hamilton

President, Hamilton Biological, Inc.

Expertise

Endangered Species Surveys General Biological Surveys CFQA Analysis Population Monitoring Vegetation Mapping Construction Monitoring Noise Monitoring Open Space Planning Natural Lands Management

Education

1988. Bachelor of Science degree in Biological Sciences, University of California, Irvine

Professional Experience

1994 to Present. Independent Biological Consultant, Hamilton Biological, Inc.

1988 to 1994. Biologist, LSA Associates, Inc.

Permits

Federal Permit No. 7E-799557 to survey for the Coastal California Gnatcatcher and Southwestern Willow Flycatcher

MOUs with the California Dept. of Fish and Game to survey for Coastal California Gnatcatcher and Southwestern Willow Flycatcher

California Scientific Collecting Permit No. SC-001107 Robert A. Hamilton has been providing biological consulting services in southern California since 1988. He spent the formative years of his career at the firm of LSA Associates in Irvine, where he was a staff biologist and project manager. He has worked as an independent and on-call consultant since 1994, incorporating his business as Hamilton Biological, Inc., in 2009. The consultancy specializes in the practical application of environmental policies and regulations to land management and land use decisions in southern California.

A recognized authority on the status, distribution, and identification of birds in California, Mr. Hamilton is the lead author of two standard references describing aspects of the state's avifauna: The Birds of Orange County: Status & Distribution and Rare Birds of California. Mr. Hamilton has also conducted extensive studies in Baja California, and for seven years edited the Baja California Peninsula regional reports for the journal North American Birds. He served ten years on the editorial board of Western Birds and regularly publishes in peer-reviewed journals. He is a founding member of the Coastal Cactus Wren Working Group and in 2011 updated the Cactus Wren species account for The Birds of North America Online. Mr. Hamilton's expertise includes vegetation mapping. From 2007 to 2010 he worked as an on-call biological analyst for the County of Los Angeles Department of Regional Planning. From 2010 to present he has conducted construction monitoring and focused surveys for special-status bird species on the Tehachapi Renewable Transmission Project (TRTP). He is a former member of the Los Angeles County Significant Ecological Areas Technical Advisory Committee (SEATAC).

Mr. Hamilton conducts general and focused biological surveys of small and large properties as necessary to obtain various local, state, and federal permits, agreements, and clearances. He also conducts landscapelevel surveys needed by land managers to monitor songbird populations. Mr. Hamilton holds the federal and state permits and MOUs listed to the left, and he is recognized by federal and state resource agencies as being highly qualified to survey for the Least Bell's Vireo. He also provides nest-monitoring services in compliance with the federal Migratory Bird Treaty Act and California Fish & Game Code Sections 3503, 3503.5 and 3513.

Curriculum Vitae for Robert A. Hamilton

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Board Memberships, Advisory Positions, Etc.

Coastal Cactus Wren Working Group (2008 present)

Los Angeles County Significant Ecological Areas Technical Advisory Committee (SEATAC) (2010–2014)

American Birding Association: Baja Calif. Peninsula Regional Editor, North American Birds (2000–2006)

Western Field Ornithologists: Associate Editor of Western Birds (1999–2008)

California Bird Records Committee (1998–2001)

Nature Reserve of Orange County: Technical Advisory Committee (1996–2001)

California Native Plant Society, Orange County Chapter: Conservation Chair (1992–2003)

Professional Affiliations

American Ornithologists' Union Cooper Ornithological Society Institute for Bird Populations California Native Plant Society

Southern California Academy of Sciences

Western Foundation of Vertebrate Zoology

Mr. Hamilton monitors noise as it relates to nesting or roosting birds using an advanced Quest SoundPro unit that can provide second-by-second logging of noise levels at the nest; this allows documentation of the varying sound pressure levels that nesting birds are exposed to during construction and evaluation of any effects associated with different levels. He is an expert photographer, and typically provides photo-documentation and/or video documentation as part of his services.

Drawing upon a robust, multi-disciplinary understanding of the natural history and ecology of his home region, Mr. Hamilton works with private and public land owners, as well as governmental agencies and interested third parties, to apply the local, state, and federal land use policies and regulations applicable to each particular situation. Mr. Hamilton has amassed extensive experience in the preparation and critical review of CEQA documents, from relatively simple Negative Declarations to complex supplemental and recirculated Environmental Impact Reports. In addition to his knowledge of CEQA and its Guidelines, Mr. Hamilton understands how each Lead Agency brings its own interpretive variations to the CEQA review process.

Representative Project Experience

In 2007, as part of follow-up reconnaissance after eradication of black rats from East, Middle, and West Anacapa Islands, the organization Island Conservation contracted with Mr. Hamilton to conduct focused surveys for the Santa Cruz Island Rufous-crowned Sparrow (Aimophila ruficeps obscura) on those three islands and the east end of Santa Cruz Island. The surveys were negative for the sparrow on all but Santa Cruz Island, where no eradication had taken place and the birds were known to be extant. Since East Anacapa Island could not be thoroughly checked, an additional survey was undertaken in March 2008, and at that time Mr. Hamilton detected two pairs on the eastern end of the island, demonstrating that the rat eradication had not resulted in extirpation of the Rufous-crowned Sparrow from East Anacapa Island.

From 2012 to 2014, Mr. Hamilton collaborated with Dan Cooper on A Conservation Analysis for the Santa Monica Mountains "Coastal Zone" in Los Angeles County, and worked with Mr. Cooper and the County of Los Angeles to

Curriculum Vitae for Robert A. Hamilton

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Insurance

\$3,000,000 professional liability policy (Hanover Insurance Group)

\$2,000,000 general liability policy (The Hartford)

\$1,000,000 auto liability policy (State Farm)

Other Relevant Experience

Field Ornithologist, San Diego Natural History Museum Scientiffic Collecting Expedition to Central and Southern Baja California, October/November 1997 and November 2003.

Field Ornithologist, Island Conservation and Ecology Group Expedition to the Tres Marías Islands, Nayarit, Mexico, 23 Jánuary to 8 Fébruary 2002.

Field Omithologist, Algalita Marine Research Foundation neustonic plastic research voyages in the Pacific Ocean, 15 August to 4 September 1999 and 14 to 28 July 2000.

Field Assistant, Bird Banding Study, Río Ñambí Reserve, Colombia, January to March 1997.

References

Provided upon request.

secure a certified Local Coastal Program (LCP) for 52,000 acres of unincorporated County lands in the Santa Monica Mountains coastal zone. The work involved synthesizing large volumes of existing baseline information on the biological resources of the study area, evaluating existing land use policies, and developing new policies and guidelines for future development within this large, ecologically sensitive area. A coalition of environmental organizations headed by the Surfrider Foundation selected this project as the "Best 2014 California Coastal Commission Vote."

In 2010, under contract to CAA Planning, served as principal author of the Conservation & Management Plan for Marina del Rey, Los Angeles County, California. This comprehensive planning document has two overarching goals: (1) to promote the long-term conservation of all native species that exist in, or that may be expected to return to, Marina del Rey, and (2) to diminish the potential for conflicts between wildlife populations and both existing and planned human uses of Marina del Rey (to the benefit of humans and wildlife alike). After peer-review, the Plan was accepted by the Coastal Commission as an appropriate response to the varied challenges posed by colonial waterbirds and other biologically sensitive resources colonizing urban areas once thought to have little resource conservation value.

Third Party Review of CEQA Documents

Under contract to cities, conservation groups, homeowners' associations, and other interested parties, have reviewed EIRs and other project documentation for numerous proposed projects, including the following:

- Newport Banning Ranch (residential/commercial, City of Newport Beach)
- The Ranch at Laguna Beach (resort, City of Laguna Beach)
- · Sunset Ridge Park (city park, City of Newport Beach)
- The Ranch Plan (residential/commercial, County of Orange)
- Southern Orange County Transportation Infrastructure Improvement Project (Foothill South Toll Road, County of Orange)

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- Gregory Canyon Landfill Restoration Plan (proposed mitigation, County of San Diego)
- Montebello Hills Specific Plan EIR (residential, City of Montebello; 2009 and 2014 circulations)
- Cabrillo Mobile Home Park Violations (illegal wetland filling, City of Huntington Beach)
- Newport Hyatt Regency (timeshare conversion project, City of Newport Beach)
- Lower San Diego Creek "Emergency Repair Project" (flood control, County of Orange)
- Tonner Hills (residential, City of Brea)
- The Bridges at Santa Fe Units 6 and 7 (residential, County of San Diego)
- Villages of La Costa Master Plan (residential/commercial, City of Carlsbad)
- Whispering Hills (residential, City of San Juan Capistrano)
- Santiago Hills II (residential/commercial, City of Orange)
- Rancho Potrero Leadership Academy (youth detention facility/road, County of Orange)
- Saddle Creek/Saddle Crest (residential, County of Orange)
- Frank G. Bonelli Regional County Park Master Plan (County of Los Angeles)

Contact Information

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robb@hamiltonbiological.com http://hamiltonbiological.com

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Selected Presentations

Hamilton, R. A. Six Legs Good. 2012-2017. 90-minute multimedia presentation on the identification and photography of dragonflies, damselflies, butterflies, and other invertebrates, given at various Audubon Society chapter meetings and similar gatherings.

Hamilton, R. A. 2012. Identification of Focal Wildlife Species for Restoration, Coyote Creek Watershed Master Plan. Twenty-minute multimedia presentation given at the Southern California Academy of Sciences annual meeting at Occidental College, Eagle Rock, 4 May. Abstract published in the Bulletin of the Southern California Academy of Sciences No. 111(1):39.

Hamilton, R. A., and Cooper, D. S. 2009-2010. Conservation & Management Plan for Marina del Rey. Twenty-minute multimedia presentation given to different governmental agencies and interest groups.

Hamilton, R. A. 2008. Cactus Wren Conservation Issues, Nature Reserve of Orange County. One-hour multimedia presentation for Sea & Sage Audubon Society, Irvine, California, 25 November.

Hamilton, R. A., Miller, W. B., Mitrovich, M. J. 2008. Cactus Wren Study, Nature Reserve of Orange County. Twenty-minute multimedia presentation given at the Nature Reserve of Orange County's Cactus Wren Symposium, Irvine, California, 30 April 2008.

Hamilton, R. A. and K. Messer. 2006. 1999-2004 Results of Annual California Gnatcatcher and Cactus Wren Monitoring in the Nature Reserve of Orange County. Twenty-minute multimedia presentation given at the Partners In Flight meeting: Conservation and Management of Coastal Scrub and Chaparral Birds and Habitats, Starr Ranch Audubon Sanctuary, 21 August 2004; and at the Nature Reserve of Orange County 10th Anniversary Symposium, Irvine, California, 21 November.

Publications

- Hamilton, R. A. 2014. Book review: The Sibley Guide to Birds, Second Edition. Western Birds 45:154–157.
- Cooper, D. S., R. A. Hamilton, and S. D. Lucas. 2012. A population census of the Cactus Wren in coastal Los Angeles County. Western Birds 43:151–163.
- Hamilton, R. A., J. C. Burger, and S. H. Anon. 2012. Use of artificial nesting structures by Cactus Wrens in Orange County, California. *Western Birds* 43:37–46.
- Hamilton, R. A., Proudfoot, G. A., Sherry, D. A., and Johnson, S. 2011. Cactus Wren (Campylorhynchus brunneicapillus), in The Birds of North America Online (A. Poole, ed.). Cornell Lab of Ornithology, Ithaca, NY.
- Hamilton, R. A. 2008. Cactus Wrens in central & coastal Orange County: How will a worst-case scenario play out under the NCCP? Western Tanager 75:2–7.
- Erickson, R. A., R. A. Hamilton, R. Carmona, G. Ruiz-Campos, and Z. A. Henderson. 2008. Value of perennial archiving of data received through the North American Birds regional reporting system: Examples from the Baja California Peninsula. *North American Birds* 62:2–9.

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- Erickson, R. A., R. A. Hamilton, and S. G. Mlodinow. 2008. Status review of Belding's Yellowthroat Geothlypis beldingi, and implications for its conservation. Bird Conservation International 18:219–228.
- Hamilton, R. A. 2008. Fulvous Whistling-Duck (*Dendrocygna bicolor*). Pp. 68-73 in California Bird Species of Special Concern: A ranked assessment of species, subspecies, and distinct populations of birds of immediate conservation concern in California (Shuford, W. D. and T. Gardali, eds.). Studies of Western Birds 1. Western Field Ornithologists, Camarillo, CA, and California Department of Fish and Game, Sacramento, CA.
- California Bird Records Committee (R. A. Hamilton, M. A. Patten, and R. A. Erickson, editors.). 2007. Rare Birds of California. Western Field Ornithologists, Camarillo, CA.
- Hamilton, R. A., R. A. Erickson, E. Palacios, and R. Carmona. 2001–2007. North American Birds quarterly reports for the Baja California Peninsula Region, Fall 2000 through Winter 2006/2007.
- Hamilton, R. A. and P. A. Gaede. 2005. Pink-sided × Gray-headed Juncos. Western Birds 36:150–152.
- Mlodinow, S. G. and R. A. Hamilton. 2005. Vagrancy of Painted Bunting (*Passerina ciris*) in the United States, Canada, and Bermuda. *North American Birds* 59:172–183.
- Erickson, R. A., R. A. Hamilton, S. González-Guzmán, G. Ruiz-Campos. 2002. Primeros registros de anidación del Pato Friso (*Anas strepera*) en México. Anales del Instituto de Biología, Universidad Nacional Autónoma de México, Serie Zoología 73(1):67–71.
- Hamilton, R. A. and J. L. Dunn. 2002. Red-naped and Red-breasted sapsuckers. Western Birds 33:128–130.
- Hamilton, R. A. and S. N. G. Howell. 2002. Gnatcatcher sympatry near San Felipe, Baja California, with notes on other species. *Western Birds* 33:123–124.
- Hamilton, R. A. 2001. Book review: The Sibley Guide to Birds. Western Birds 32:95-96.
- Hamilton, R. A. and R. A. Erickson. 2001. Noteworthy breeding bird records from the Vizcaíno Desert, Baja California Peninsula. Pp. 102-105 in Monographs in Field Ornithology No. 3. American Birding Association, Colorado Springs, CO.
- Hamilton, R. A. 2001. Log of bird record documentation from the Baja California Peninsula archived at the San Diego Natural History Museum. Pp. 242–253 *in* Monographs in Field Ornithology No. 3. American Birding Association, Colorado Springs, CO.
- Hamilton, R. A. 2001. Records of caged birds in Baja California. Pp. 254–257 *in* Monographs in Field Ornithology No. 3. American Birding Association, Colorado Springs, CO.
- Erickson, R. A., R. A. Hamilton, and S. N. G. Howell. 2001. New information on migrant birds in northern and central portions of the Baja California Peninsula, including species new to Mexico. Pp. 112–170 in Monographs in Field Ornithology No. 3. American Birding Association, Colorado Springs, CO.
- Howell, S. N. G., R. A. Erickson, R. A. Hamilton, and M. A. Patten. 2001. An annotated checklist of the birds of Baja California and Baja California Sur. Pp. 171–203 in Monographs in Field Ornithology No. 3. American Birding Association, Colorado Springs, CO.

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- Wurster, T. E., R. A. Erickson, R. A. Hamilton, and S. N. G. Howell. 2001. Database of selected observations: an augment to new information on migrant birds in northern and central portions of the Baja California Peninsula. Pp. 204–237 *in* Monographs in Field Ornithology No. 3. American Birding Association, Colorado Springs, CO.
- Erickson, R. A. and R. A. Hamilton, 2001. Report of the California Bird Records Committee: 1998 records. *Western Birds* 32:13–49.
- Hamilton, R. A., J. E. Pike, T. E. Wurster, and K. Radamaker. 2000. First record of an Olive-backed Pipit in Mexico. *Western Birds* 31:117–119.
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- Erickson, R. A., and R. A. Hamilton. 1993. Additional summer bird records for southern Mexico. *Euphonia* 2(4): 81–91.
- Erickson, R. A., A. D. Barron, and R. A. Hamilton. 1992. A recent Black Rail record for Baja California. *Euphonia* 1(1): 19–21.



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



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

In Reply Refer To: FWS/CDFW-SDG-13B0298-13TA0290

Mr. Jeffrey Harkness Park Planner City of San Diego Development Services Department 1222 First Avenue, MS 501 San Diego, California 92101

MAY 24 2013

Subject: Preliminary Comments on the Draft Mission Trails Regional Park (MTRP) Master Plan Update (MPU) and Natural Resource Management Plan (NRMP), City of San Diego, California.

Dear Mr. Harkness:

The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Wildlife (Department), collectively referred to as the Wildlife Agencies, have reviewed the abovereferenced documents, which we received on March 27, 2013. The comments provided herein are based on information provided in the draft MPU and NRMP, our meeting on May 17, 2013, our knowledge of sensitive and declining vegetation communities, our participation in the Multiple Species Conservation Program (MSCP), and the City of San Diego's (City) MSCP Subarea Plan (SAP).

The primary concern and mandate of the Service is the protection of fish and wildlife resources and their habitats. The Service has legal responsibility for the welfare of migratory birds. anadromous fish, and threatened and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Federal Endangered Species Act of 1973 (Act), as amended (16 U.S.C. 1531 et seq.), including habitat conservation plans (HCPs) developed under section 10(a)(1) of the Act,

The Department is a Trustee Agency with jurisdiction over natural resources affected by the project (California Environmental Quality Act [CEQA] Guidelines §15386) and as a Responsible Agency under CEQA Guidelines Section 15381 over those aspects of the proposed project that come under the purview of the California Endangered Species Act (Fish and Game Code §2050 et seg.) and Fish and Game Code Section 1600 et seg. The Department also administers the Natural Community Conservation Planning Program (NCCP). The City participates in the NCCP and the Service's HCP Programs by implementing its MSCP SAP. The NRMP is an implementing requirement of the City's SAP. The NRMP serves as a set of area specific

Mr. Jeffrey Harkness (FWS/CDFW-SDG-13B0298-13TA0290)

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management directives (ASMDs) for this conserved area of the City's SAP pursuant to section 10.6. Preserve Management, of the City's SAP Implementing Agreement (IA).^a

The overarching goal of the MSCP is to maintain and enhance biological diversity in the region and conserve viable populations of sensitive species. Important biological resources in the MTRP include coastal sage scrub, riparian scrub, and vernal pools. Significant populations of willowy monardella [Monardella viminea (M. linoides subsp. v.)], San Diego thornmint (Acanthomintha ilicifolia), Orcutt's brodiaea (Brodiaea orcuttii), San Diego ambrosia (Ambrosia punila), San Diego fairy shrimp (Branchinecta sandiegonensis), least Bell's vireo (Vireo bellii pusillus), and coastal California gnateatcher (Poliopitla californica californica) occur in the MTRP. The MTRP includes mitigation areas and lands in the City's SAP Multiple Habitat Planning Area (MIPA), or preserve, used to fulfill MSCP conservation obligations.

The management directives for trail location, design, and management, especially within core resource areas of the City's SAP, are found in the City's General Plan Update and SAP. The City's General Plan Update directs that public access within open space areas be consistent with City's SAP. Under the City's SAP, recreational trails in the MHPA are considered a conditionally compatible use. Management directives given in the City's MSCP Subarea Plan for recreational trails in the MHPA include the following: locate trails in the least sensitive areas of the MHPA; use existing dirt roads as much as possible; do not locate trails wider than four feet in core areas or wildlife corridors; allow only passive recreational uses; no new trails should be cut through existing habitat; restore existing dirt roads and trails; and avoid vernal pool habitat and their associated watersheds. These management directives are the guiding principles that should be followed when designating recreational trails in the MTRP. Table 1 summarizes these management directives for recreational trail location, design and management within the MITPA, and specifically the area covered by the NRMP.

The Wildlife Agencies have recently been made aware by City staff that unauthorized trails have been apparently created, mainly by and for mountain bikers, throughout the MTRP. These unauthorized trails have impacted sensitive biological resources and threaten the MTRP's function as biological preserve in the City's MHPA. While not directly addressed in the City's SAP, appropriately located and managed mountain biking could be considered a passive and, therefore, conditionally acceptable use in the MTRP. However, the illegal creation and current high density of bike trails must be curtailed and corrected.

The Wildlife Agencies offer the following comments to assist the City in avoiding/minimizing impacts to sensitive biological resources and ensuring SAP compliance for the NRMP:

 The MTRP planning area is located within a SAP core biological resource area and functions as important biological habitat in the eastern portion of the City. For these reasons, we recommend that impacts to habitat from any proposed improvements

a Section 10.6 of the City's MSCP IA states that the City has" a requirement for the subsequent preparation and implementation of area-specific management directives (ASMDs), which shall be prepared in a phased manner for logical and discrete areas of land within the Subarea as those lands are committed to permanent preservation."

Mr. Jeffrey Harkness (FWS/CDFW-SDG-13B0298-13TA0290)

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(e.g., trails, parking lots, and other public facilities) be minimized to the maximum extent practicable. Any proposed improvements should avoid all populations of covered species, and minimize impacts to sensitive habitats and wildlife movement areas consistent with the City's SAP. In addition, we recommend that all mitigation occur within the project boundaries, preferably within the same area as the proposed impact. If feasible, a larger area could be identified and used to mitigate upfront for all anticipated impacts from the proposed project. Off-site mitigation for any proposed impacts is not recommended due to the high sensitivity of MTRP and it being a core resource area for the City's SAP. Based on our meeting on May 17, 2013, it is our understanding that subsequent environmental review would be required for any project identified in the MPU that would result in impacts to biological resources.

- 2. MTRP is an important regional resource that attracts visitors county-wide. Management and monitoring of the usage patterns are essential to the long-term function of the preserve for biological resources and compatible public access. We recommend that both the MPU and NRMP include goals and measurable objectives using "SMART" criteria (i.e., Specific, Measurable, Achievable, Results-oriented, and Time-fixed) to monitor usage type/patterns and that the results of this monitoring be incorporated into adaptive management strategies for species contained in the NRMP.
- 3. The MPU (Section 5.6) includes a summary of how the City's SAP is incorporated into the goals and policies of the project. However, we recommend that this section (or another appropriate area within the MPU) include a description of how the NRMP relates to the MPU and MSCP. For example, it is our understanding that the MPU will provide the framework for land management and public access for MTRP and that the SAP ASMDs for the covered species (refer to Table 3-5 of the City's SAP) within the project area will be contained in the NRMP, which will be an appendix to the MPU. Together, both the MPU and NRMP will provide the necessary goals, policies and implementation tools to ensure that the land within MTRP is adequately managed for biological resources through an adaptive management strategy and also for compatible public use and access. In order for the City to more clearly demonstrate SAP compliance with the conditions of coverage for applicable covered species (i.e., those species which require ASMDs and which occur within MTRP), we suggest that the NRMP provide a section or a table summarizing the species requiring ASMDs and include a reference to the section (management action) of the NRMP that satisfies the requirement. We also recommend that the MPU include a summary analysis of how the goals and policies of the MPU are consistent with the General and Specific Management Directives found in the City's SAP for proposed public access/trails, parking expansion (e.g., CM-F1 and MG-F6) and those for East Elliott, Navajo (Cowles Mountain), and Lake Murray.
- 4. The northern portion of MTRP includes several parcels that have been used as mitigation for various local projects (e.g., Sycamore Landfill, MTRP horse staging facility, City's Habitat Acquisition Fund purchases). To the extent possible, any trail or public facility proposed under the MPU should avoid these areas. Where impacts cannot be avoided to these lands that served as mitigation, mitigation for impacts needs to occur at double the

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normal ratio in order to account for the previous mitigation requirement and also provide mitigation for the current proposed impact.

- 5. The current language used throughout the NRMP (e.g. "should" and "recommend") does not allow identification of those management actions that are required to be performed by the City, particularly the "Priority I" MSCP directives that are necessary to maintain coverage for species under the City's existing federal and state permits. Priority I actions should be clearly distinguishable from "Priority 2" actions that may be recommended as funding and resources become available. Although on an annual basis the appropriateness of implementing Priority 1 and 2 actions may be discussed with the Wildlife Agencies and evaluated in an annual work plan (subject to adaptive management considerations), the NRMP should clearly identify the City's obligations to implement any "Priority I" actions associated with the above-mentioned ASMDs pursuant to a science-based, adaptive management program.
- 6. We recommend that the NRMP provide more discussion of the enforcement actions that are currently being implemented (and any being proposed for future implementation) as they relate to trails and biological resources. Relevant information on existing ranger patrols (e.g., frequency, hours per day, volunteer programs, etc.) should also be included as this may assist in evaluating management needs relative to changing conditions (e.g., habitat conditions, public use patterns, competing priorities, etc.) over time. Additionally, any seasonal restrictions on public access needed to achieve species conditions of coverage should be clearly set forth in the MPU and NRMP. Similarly, key species/resource areas that may require close monitoring to determine if additional enforcement or seasonal access restrictions may be necessary should also be identified. Based on the Department's experience with public access to sensitive biological areas, signage and enforcement are critical components of an access program that provides opportunities for the public to recreate in sensitive areas while maintaining the resource primarily for species and wildlife. Where the MPU proposes access beyond what is currently allowed, we recommend that, at a minimum, monitoring be expanded to determine if additional signage and/or enforcement are also necessary. Opportunities may also exist to partner with community groups and organizations to provide trained volunteer patrols.
- 7. The MPU (e.g., Section 5.5.5) includes numerous trail closures, reroutes, and construction of new trails for a net increase in total miles of trails within MTRP over existing conditions. The Wildlife Agencies would like to meet with the City to discuss the location, size, potential redundancies, and merit of any new trails or trail reroutes. Based on our May 17, 2013 meeting, follow-up site visits to the project area will be scheduled. We look forward to attending the site visit(s) with the City and may provide additional comments after we have the opportunity to meet. For proposed trail closures, we recommend that active restoration be included to the extent practicable and/or that materials from proposed trails construction (e.g., topsoil, brushed vegetation, etc.) be used to create visual and physical barriers to implement trail closures.

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We appreciate the opportunity to comment on the MPU and NRMP. We are hopeful that further we appreciate the opportunity to comment on the MPO and NRMP. We are noperal that further coordination with us will ensure the protection we find necessary for the biological resources that would be affected by this project. If you have questions or comments regarding this letter, please contact Randy Rodriguez (858-467-4201; randy.rodriguez@wildlife.ca.gov) or Kyle Dutro (858-467-4267; kyle.dutro@wildlife.ca.gov) of the Department; or Patrick Gower of the Service (760-431-9440; patrick_gower@fws.gov).

Sincerely,

Karen A. Goebel Assistant Field Supervisor U.S. Fish and Wildlife Service

David A. Mayer Acting Environmental Program Manager California Department of Fish and Wildlife



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In Reply Refer To: FWS/CDFW-SDG-13B0298-13TA0389

AUG 9 1 2013

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

Subject: Supplemental Preliminary Comments on the Draft Mission Trails Regional Park

(MTRP) Master Plan Update (MPU) and Draft Natural Resource Management Plan

(NRMP), City of San Diego, California

Dear Mr. Harkness:

The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Wildlife (Department), collectively referred to as the Wildlife Agencies, appreciate the opportunity to conduct site visits with the City of San Diego (City) on June 4 and 25, 2013, to review and discuss the potential trail alignments and constraints proposed in the MPU. The Wildlife Agencies provided a comment letter on May 24, 2013, for the preliminary review of the draft MPU and NRMP. We understand the importance of this project to the City and would like to continue working with staff on refinements to project design, including identifying feasible measures to address unauthorized trail construction/use, while focusing on the goal to achieve project consistency with the Multiple Species Conservation Program (MSCP) and the City of San Diego's MSCP Subarea Plan (SAP). The supplemental comments provided herein are based on: information included in the draft MPU and NRMP preliminary project review meeting on May 17, 2013; the site visits; geographic information system (GIS) data provided by the City; our knowledge of sensitive and declining vegetation communities; and our participation in implementation of the MSCP and City's SAP.

The MPU serves as an update to the 1985 MTRP Master Development Plan to better reflect the following: (1) current status of the MTRP's development; (2) evolving requirements of environmental protection; (3) the potential expansion of the park to 9,700 acres with the addition of properties in East Elliot and West Sycamore; and (4) compliance with the City's SAP requirement to develop a NRMP. MTRP is a core biological area and regional wildlife corridor within the Multi-Habitat Planning Area (MHPA) established by the City's SAP and is managed to achieve the goals of the MSCP.

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As stated in our preliminary comment letter, biological resources of concern within MTRP include coastal sage scrub, riparian scrub, and vernal pools. Within MTRP exist significant populations of willowy monardella [Monardella viminea (M. linoides ssp. viminea)], San Diego thorrmint (Acanthomintha ilicifolia), Orcut's brodiaca (Brodiaca orcuttii). San Diego ambrosia (Ambrosia pumila), San Diego fairy shrimp (Branchinecta sandiegonensis), least Bell's vireo (Vireo bellii pusillus), and coastal California gnateatcher (Polioptila californica californica). The MTRP also includes mitigation areas and lands in the City's SAP MHPA, or preserve, used to fulfill MSCP conservation obligations.

In addition to the biological resource impact concerns and resource conservation and species protection guidance identified in our preliminary comment letter, we have the following supplemental issues for the City's consideration:

General Comments

- 1. The Wildlife Agencies acknowledge the difficulty to prevent unauthorized trail construction and use in MTRP, especially within the East Elliot core area, given current City park ranger staffing levels, overall visitor use, multiple points of access using existing utility access roads, and the patchwork of private land ownership and mitigation land in East Elliot and West Sycamore. However, based on our site visits, we believe the construction and use of unauthorized trails has far exceeded the level of impact anticipated by the MSCP which would qualify human recreation as a "compatible use" within the MHPA, has directly and adversely impacted sensitive biological resources, and threatens MTRP's function as a core biological area and regional wildlife corridor within the MIIPA. We are especially concerned that the current level of management and enforcement directed to this area is not effective in addressing the unauthorized impacts to MTRP. On the site visit to MTRP, City staff stated that East Elliot is not regularly patrolled due to staffing constraints. Therefore, it is unclear if the City has the resources to proactively address the extensive unauthorized trail construction and use (particularly within East Elliot) with a focus on ensuring the long-term conservation value of MTRP. Our fundamental concern is the City's ability to effectively manage the biological resources in MTRP and possibly other MHPA preserves per conditions of the City's SAP and Implementing Agreement (IA), and thereby ensure preserves are conserved and protected in perpetuity.
- 2. The unauthorized construction and use of trails should be immediately addressed and effectively controlled prior to moving forward with plans to redesign or construct new trails in MTRP. In order to achieve this goal, the City should demonstrate the following: (1) all unauthorized trails and redundant trails/utility roads have been closed and are in the process of being successfully restored; (2) effective enforcement or other substantial measures have been initiated to curtail unauthorized trail construction and use; and, (3) measurable progress regarding the effectiveness of the enforcement or substantive measures. The City should outline its efforts to date that are in place to address unauthorized trail construction and use, including current staffing directed to patrolling

Mr. Jeffrey Harkness (FWS/CDFW-SDG-13B0298-13TA0389)

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within affected areas, extent of community outreach events or public forums provided to raise public awareness (particularly with identifiable user base), posting of appropriate signage and/or erecting physical barriers to restrict unauthorized trail construction.

- 3. Based on the information provided in the draft MPU and NRMP, and the site visits, we are still unclear on what criteria are being used to determine whether an existing trail is authorized or unauthorized. Please provide the baseline documentation used to make this determination. Any trails, including user created trails, that were not part of the 1985 MPU should be considered unauthorized regardless of current use patterns or how long the trail has existed. The MPU should include a table detailing the total amount of approved trails, proposed trails, unauthorized trails, and closed trails. The table should also include proposed acres of impact and proposed acres of restoration by habital type.
- 4. Please provide a project level map and associated descriptions (ownership, level of use, etc.) for all utilities/casements/access casements within MTRP. The MPU should indicate those utility access roads that the City has the authority to close and has actually committed to close and restore. We are available to facilitate discussions between the City and utility operators (e.g., San Diego Gas & Electric Company) regarding roads which are essential for operations and maintenance, can be designated for use by hikers/bikers, or can be closed for restoration.
- 5. Potential impacts from trail(s) within close proximity to rock faces that could result in wildlife impacts (e.g., raptor and bat species) should be thoroughly evaluated and adequate buffers should be provided in these areas. Access roads or trails adjacent to the buffer should be fenced to preclude human intrusion. Regarding bats, the City could consider incorporating bat houses in nearby areas (away from public access) to provide available habitat. We recommend a bat expert be consulted to evaluate impacts and provide specific direction for any enhancement actions.

Area Specific Comments

Fortuna Mountain/Mission Gorge Area

- There are numerous areas within this project segment where redundant trails and utility
 access roads exist. We recommend evaluating options consistent with the City's SAP to
 consolidate trails and to use existing utility roads to the maximum extent possible. A
 similar evaluation should be provided to other areas slated for constructing new trails.
- The Wildlife Agencies support several of the City's proposed reroutes in this area, particularly in order to avoid vernal pools and San Diego ambrosia populations.
 However, to be successful the City will need to undertake or coordinate a substantial enforcement effort to prevent continued use and habitat degradation outside of the designated trails in these areas. This may require efforts to control various points of access into this area.

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• We are extremely concerned with a particular unauthorized trail that appears to run directly through a population of San Diego ambrosia that is located within the east Fortuna staging area (near Grassland Loop Trail). San Diego ambrosia is a narrow endemic species in the City's MSCP SAP; therefore, measures to protect this conserved population must be urgently developed and implemented. Additionally, it is important for the City to more promptly notify the Wildlife Agencies of unauthorized impacts occurring on this scale so that remedies can be identified and further impacts to conserved habitat minimized or averted.

 For sections of trail alignment that cross through riparian areas, we recommend either alignments that use existing access roads, and to the extent reasonable or feasible, rerouting trails outside of riparian areas.

Cowles Mountain Area

- The field visit clearly indicated that there is a very high level of public use, and substantial damage is occurring to habitat outside of the designated trail system. Given the deteriorated trail and habitat conditions observed on the south side of Cowles Mountain, at this time the Wildlife Agencies do not support the City's proposal to construct a new parking and staging area on the east side of Cowles Mountain as we believe that this would only exacerbate the situation by promoting additional uncontrolled access. Therefore, the City should demonstrate substantial progress to protect/recover the MSCP-designated conserved habitat, and to restrict human impacts to the existing approved/designated trails, before constructing new facilities.
- Due to uncertainties with protecting conserved habitat, restoring the existing designated trail, and restricting direct human impacts to the new trail, at this time we do not support rerouting the Cowles Mountain trail from Golfcrest Drive.

East Elliot Area

The Wildlife Agencies are extremely concerned with the unauthorized construction and
use of trails and the lack of routine patrols and ability to enforce trail regulations within
the East Elliot core area. Therefore, the trail network within the East Elliot core area
should be closed until the City can identify and implement an effective enforcement
strategy to control the construction and use of the unauthorized trails throughout the area.

West Sycamore Area

Due to the presence of willowy monardella in several of the on-site drainages, we are
concerned with any additional trails proposed in proximity to known populations of this
species. Trail alignments that are routed near known populations will likely increase
detrimental edge effects from trail use. As required by the MSCP, we recommend that
the City prepare area specific management directives for our review to protect against

Mr. Jeffrey Harkness (FWS/CDFW-SDG-13B0298-13TA0389)

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detrimental edge effects, including indirect effects from trail use.

- Given the number of utility roads that occur in this area, we recommend additional
 consideration be given to; consolidating designated trails; using existing dirt roads to the
 extent feasible; and restoring (actively or passively) trails which should be closed.
- Access roads we observed on our site visit where well beyond the widths that would
 typically be needed for public utility purposes. Therefore, access road areas beyond the
 minimum width necessary to serve for public utility purposes should be closed and
 restored to native habitat.

Lake Murray Area

Although this general area is heavily urbanized, portions of the project extend into the
City's MHPA. We are concerned with the City's proposal to establish a new trail within
the area's last remaining high quality habitat located on the western edge of the lake,
(which is occupied by the coastal California gnatcatcher). If the City commits to
substantial restoration efforts within the Lake Murray area (including closures of some
redundant trails/access roads), the new trail may be appropriate at a future date.

Our comments are intended to complement existing work the City has completed to date and to provide guidance as the MPU and NRMP proceed forward. We want to continue to work with the City on refining the project to address the concerns raised in both of our comment letters by resolving any potential conflicts between resource conservation and trail use within the MHPA. We are hopeful that our concerns can be adequately addressed prior to the forthcoming CEQA documentation prepared for the MPU and NRMP. We look forward to working with City on completing the MPU and NRMP. If you have questions or comments regarding this letter, please contact Paul Schlitt of the Department at 858-637-5510 or paul.schlitt@wildlife.ca.gov, or Patrick Gower of the Service at 760-431-9440 or patrick gower@fws.gov.

Sincerely,

Assistant Field Supervisor
U.S. Fish and Wildlife Service

Gail K. Sevrens

Environmental Program Manager California Department of Fish and Wildlife



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In Reply Refer To: FWS/CDFW-SDG-13B0298-14TA0247

APR 0 1 2014

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

Subject: Supplemental Preliminary Comments on the Draft Mission Trails Regional Park (MTRP) Master Plan Update (MPU) and Draft Natural Resource Management Plan

(NRMP), City of San Diego, California

Dear Mr. Harkness:

The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Wildlife (Department), collectively referred to as the Wildlife Agencies, appreciate the opportunity to provide additional preliminary comments on the draft MPU and NRMP, as discussed in our March 7, 2014, meeting with City of San Diego (City) Councilmember Scott Sherman. We understand the importance of this project to the City and would like to continue working with staff on refinements to project design, including identifying feasible measures to address unauthorized trail construction/use, while focusing on the goal to achieve project consistency with the Multiple Species Conservation Program (MSCP) and the City of San Diego's MSCP Subarea Plan (SAP). To that end, we have prepared maps (enclosed) showing draft trail designs for MTRP

In preparing these trail designs, we applied the following management directives given in the City's SAP for recreational trails in the MHPA: locate trails in the least sensitive areas of the MHPA; follow existing dirt roads as much as possible; do not locate trails wider than 4 feet in core areas or wildlife corridors; allow only passive recreational uses; restore existing dirt roads and trails; and avoid vernal pool habitat and their associated watersheds. Although the management directives also state that no new trails should be cut through existing habitat, our designs include limited segments of new trails that would generally replace existing unauthorized trails that the City has deemed unstable/unsafe and allow for functional loops.

Further field review of these trail designs will be needed to ensure no sensitive resources would be impacted. For example, the new trail shown in Mission Gorge would need to be designed to avoid potential bat roosting areas. In addition, before any new trails could be constructed the

Mr. Jeffrey Harkness (FWS/CDFW-SDG-13B0298-14TA0247)

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City would need to demonstrate that it has the resources and ability to curtail further unauthorized trail construction and to restore existing unauthorized trails. Overall, we believe these trail designs could be compatible with the City's SAP and should be included in the draft MPU and NRMP for public review and comment.

We look forward to working with City on completing the MPU and NRMP. If you have questions or comments regarding this letter, please contact Paul Schlitt of the Department at 858-637-5510 or paul.schlitt@wildlife.ca.gov, or Patrick Gower of the Service at 760-431-9440 or patrick gower@fws.gov.

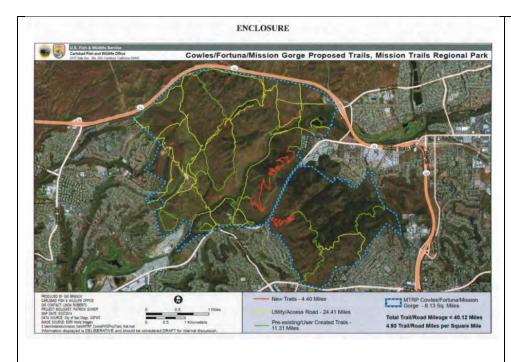
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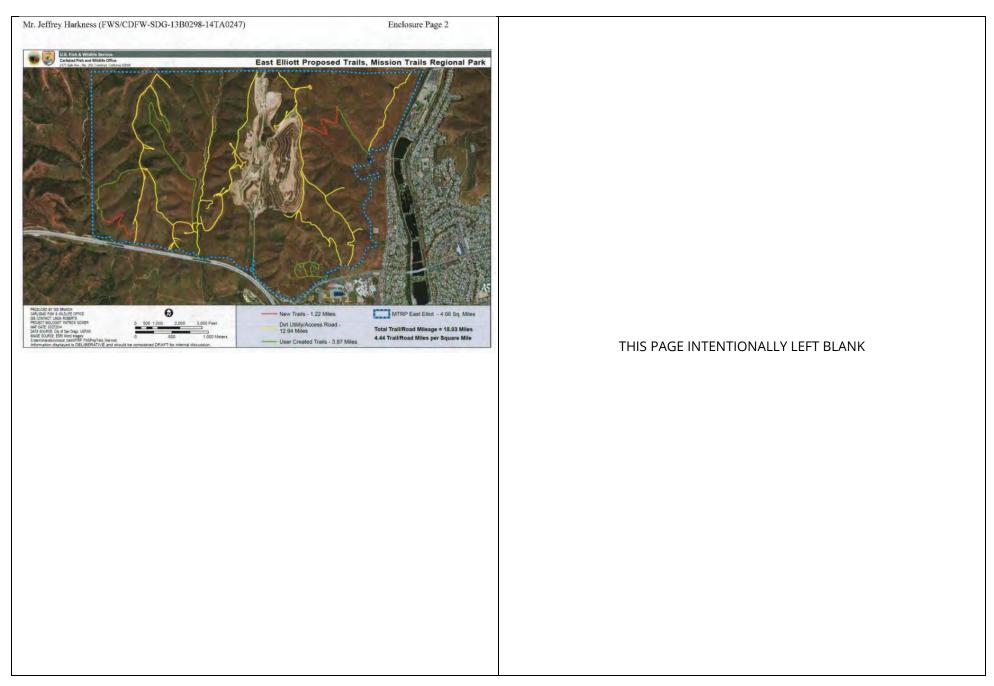
Karen A. Goebel Assistant Field Supervisor U.S. Fish and Wildlife Service

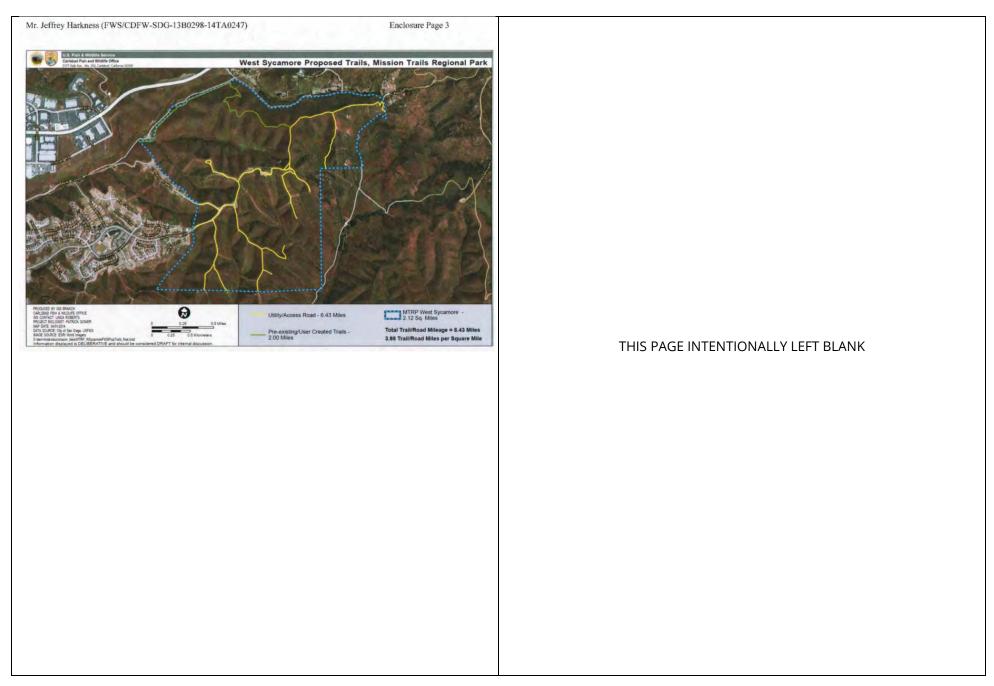
Enclosure

Gail K. Sevrens

Environmental Program Manager California Department of Fish and Wildlife









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In Reply Refer To: FWS/CDFW-SDG-13B0298-17TA0296

20 January 2017 Sent by email

Ms. Alyssa M. Muto Deputy Director of Environment and Policy Analysis City of San Diego Planning Department 1010 Second Avenue, Suite 1200 East Tower, MS-413 San Diego, California 92101

Subject: Mission Trails Regional Park Master Plan Update, City of San Diego, California

Dear Ms. Muto:

The U.S. Fish and Wildlife Service (Service) and the California Department of Fish and Wildlife (Department), collectively referred to as the Wildlife Agencies, are providing these additional preliminary comments on the Mission Trails Regional Park (MTRP) Master Plan Update (MPU), following our discussion and meeting with you on December 9, 2016. We have been working with the City of San Diego (City) since 2013 to develop a trails plan as part of the MTRP MPU that provides adequate recreational opportunities while protecting the sensitive resources in the park. Our overall focus is to ensure project consistency with the Multiple Species Conservation Program (MSCP) objectives and the City's MSCP Subarea Plan. We are concerned that the City is moving forward with publication of a Draft Environmental Impact Report (DEIR), including identification of a preferred alternative, in advance of resolving significant wildlife issues repeatedly brought to your attention.

Throughout our discussions on the proposed trail plan for the park, our primary goal has been to ensure that some portions of this large conserved block of habitat, though serving as a regional park, will maintain areas insulated from human access and related sources of disturbances (e.g., hiking, biking). This is important to ensure protected lands support more secretive aspects of larger wildlife species' life history requirements, such as deer fawning areas, bobcat dens, etc. This position is supported by the City of San Diego, Mission Trails Regional Park Open Space Mammal Monitoring and Habitat Assessment Project, Comprehensive Final Report (Western Tracking Institute 2010; Habitat Assessment) that identified several "safe harbor zones" for wildlife that "must be aggressively protected."

We have provided input and written comments on the preliminary trails design in an effort to refine the trails design, including addressing unauthorized trail construction/use in portions of MTRP, and have worked in good faith to agree to trails, including single track trails, loop trails, and 5.62 miles of new trails throughout the park. At the December meeting, the City provided a

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draft trails plan that includes trails extending into the portion of Oak Canyon on the western side of East Elliot. We previously indicated in a September 11, 2015, email and in meetings that, based on the available information, the Wildlife Agencies do not support this trail due to the sensitivity of wildlife resources in the area.

Specifically, the Habitat Assessment identified the four undercrossings of State Route 52, including the Oak Canyon Bridge, as the only possible safe egress/ingress avenues for terrestrial wildlife at MTRP. The Habitat Assessment also identified areas in proximity to the Oak Canyon Bridge as a safe-harbor zone that provides refuge including breeding areas for all species, concluding that safe-harbor areas must be aggressively protected. The Habitat Assessment emphasizes "Protecting and enhancing safe harbor areas, wildlife movement routes, and movement corridors within MTRP will be vital to its long term success as a wildlife core area within the greater Multiple Species Conservation Program of the City of San Diego."

In addition, the Mission Trails Regional Park Oak Canyon Wildlife Assessment Related to a Proposed Trail Realignment Summary of Findings (Martin 2015; Wildlife Assessment) identified the areas northeast and northwest of the State Route 52 bridge over Oak Canyon as deer hotspots and the floor of the canyon north of the bridge, where there are existing unauthorized trails, as a foraging area (night) and a movement corridor between sensitive habitat areas located northeast and northwest of the bridge. The report acknowledges that this area supports many species and is an important core area for wildlife, in particular providing year round use by deer, including within the canyon bottom. The report concludes that the Oak Canyon trail would avoid the most sensitive wildlife habitat zones and, if managed well, will help support a wide diversity of species.

We agree that the area is an important core area. However, due to the adjacency to protected land on Marine Corps Air Station Miramar, documented very high levels of use by deer and other wildlife, and expectation that this area and the adjoining canyons will support deer fawning, we disagree that a trail through this area sufficiently protects sensitive biological resources in Oak Canyon. Therefore, we do not support a trail through the length of Oak Canyon extending north of SR-52.

At the December meeting, the City agreed to analyze a "no trail" alternative for the Oak Canyon area, although you stated that it will not be included as the preferred alternative within the DEIR. As stated in the meeting, our desire is to reach agreement with the City on a comprehensive trail plan that can be presented as the preferred alternative in the DEIR and to avoid comments through the environmental review process about the inconsistency of the trail plan with the City's Subarea Plan and associated State and Federal permits. Therefore, we request that the DEIR either identify a trail plan agreed to by the Wildlife Agencies as the preferred alternative, or not identify a preferred alternative.

During our meeting, several other areas of concern were addressed for which we have specific recommendations or comments as follows:

Ms. Alyssa Muto (FWS/CDFW-SDG-13B0298-17TA0296)

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- The City emphasized it could or would not enforce use restrictions at East Elliott, including nighttime use, is unwilling to install fencing, and could not maintain fencing once installed. In addition, you indicated that the City is reluctant to include enforcement measures such as confiscation of bicycles. We provided examples where the Department successfully enforces fencing and compliance with closed areas in its own lands, such as at Del Mar Mesa, with far fewer resources than those at the disposition of the City. The City's current comments again raise questions as to the City's willingness or ability to effectively manage your MSCP preserve areas (see August 1, 2013, letter from the Wildlife Agencies to the City). To remain in compliance with State and Federal permits for the City's MSCP Subarea Plan, the City must demonstrate the ability to manage the preserve areas in East Elliot, including enforcing trail closures where necessary, to achieve the goals of the MSCP for the covered species addressed by the plan.
- City staff have stated that trail use is not impacting wildlife at MTRP because wildlife is now present despite the current unauthorized use. While trail use may not totally preclude wildlife use of trail areas, it may hinder or alter wildlife behavior and temporal use of the preserves. The Del Mar Mesa Enforcement Project (SANDAG 2015) suggests that the daily wildlife use is correlated with human use and found that once unauthorized trail use was curtailed, a shift in the use of the Del Mar Preserve by wildlife from mostly at night, to morning and evening hours was observed. As the City proceeds with CEQA review, we encourage staff to revisit the trails design proposal and reevaluate the existing literature that examines the effects of recreational activities on altering wildlife movement patterns, particularly within the context of the urban/wildland interface. Some of this literature was provided to you at the December meeting. In addition, it is important for the City to recognize that the basis for accepting MSCP preserve lands as mitigation for impacts to covered species includes the commitment to manage the lands so that habitat conditions for wildlife are sustained or improved and are not degraded by recreational use.
- In previous meetings, the City informed the Wildlife Agencies that it wanted to suspend
 further discussion about the East Elliott core area until it had completed an environmental
 analysis of trail impacts. At the December meeting, the City indicated that the analysis
 was complete but did not share or discuss the results of the analysis. We request to
 review this analysis prior to public review.
- The City indicated that they met specifically with mountain bikers but not with other stakeholders. It is unclear what measures were taken by the City to ensure all stakeholders were informed about meetings or if the City has had discussions with other stakeholders outside of management meetings. In the future, we recommend that the City engage all stakeholders in the preliminary process of trail development to ensure issues are addressed without partiality to any one group.
- The Service and the State of California worked together to purchase lands within East Elliot with grants provided under Section 6 of the Federal Endangered Species Act. The

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City proposes to locate trails on or near property that was acquired with Section 6 grants and land that was used by the City to leverage the grants in the East Elliot area. The Wildlife Agencies will need to more closely examine the specific parcels purchased with, or serving as match for, Section 6 funds in order to ensure the trails are consistent with the original grant purposes.

The Wildlife Agencies acknowledge the difficulty in managing preserve lands in MTRP, especially within the East Elliot core area, and we understand the desire to move forward with public review of the DEIR. We are committed to working with the City to resolve these issues prior to release of the draft document. However, if you choose to proceed with release of the document, please anticipate significant comments and objections to any alternative that includes build out of the trail system within Oak Canyon and the southern portion of East Elliot across the Spring Canyon area as shown to us at the December meeting.

If you or your staff would like to meet to discuss the recommendations and comments in this letter, we would do so at our earliest opportunity; please contact Patrick Gower of the Service at 760-431-9440, extension 352, or Paul Schlitt of the Department at 858-637-5510.

Sincerely,

Karen A. Goebel Assistant Field Supervisor U.S. Fish and Wildlife Service Gail K. Sevrens Environmental Program Manager California Department of Fish and Wildlife

Literature Cited:

City of San Diego Park and Recreation Department. (2016). Mission Trails Regional Park Master Plan Update. City of San Diego, California.

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Western Tracking Institute. (2010). City of San Diego, Mission Trails Regional Park Open Space Mammal Monitoring and Habitat Assessment Project. Final Report prepared for City of San Diego Open Space Division Park and Recreation. May 2010. 48 pp.

Letter B2

Johnson, Smith & Foy

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March 3, 2017

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RE: COMMENTS ON DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT FOR MISSION TRAILS REGIONAL PARK MASTER PLAN UPDATE (WBS No. S-01014.02.06)

Greetings:

B2-1

We submit this letter on behalf of Endangered Habitats League (EHL) to provide comments on the Draft Program Environmental Impact Report (PEIR) for the Mission Trails Regional Park Master Plan Update. Upon review, the PEIR contains numerous significant deficiencies which render it legally inadequate under the California Environmental Quality Act ("CEQA")(Pub. Res. Code § 21000 et seq.). First and foremost, the PEIR and tiering process is regularly misused to defer analysis, evaluation, and consideration of mitigation measures where impacts of proposed implementing projects are reasonably foreseeable. The PEIR should be substantially modified to properly consider broad policy alternatives and program-wide mitigation measures while also informing the public and decision-makers of those effects which are reasonably foreseeable at this time.

B2-2

The PEIR also regularly fails to analyze significant environmental effects of the Project which may occur off-site and outside the boundaries of the Project. For example, the Project proposes modification which would increase use of the park and modify trail access in areas adjacent to other open spaces and trails, which would likely increase access of those facilities outside the park. The West Sycamore Planning Area, for example, is connected to Goodan Ranch Sycamore Canyon Preserve to the east, and also has connecting trails to open space areas to the north under and across Scripps Poway Parkway. Yet the EIR limits evaluation to the Project boundaries. As another example, Fortuna Mountain Area Planning recommends at P5 ensuring trail linkages are made as shown in the San Diego River Park Master Plan, but fails to consider if the proposed modification in this area would impact the SD River Park and trails from increased use, new trails, etc.

B2-3

The PEIR also fails to adequately evaluate and mitigate for other significant impacts. The PEIR further failed to consider a reasonable range of Project alternatives, and improperly rejected the Reduced Project Alternative where it would significantly reduce impacts to biological resources.

- B2-1 Comment noted. Please see Responses to Comments B2-4 through B2-8 and B2-10 through 31 for more detailed responses to the comments presented in Section I and II of this letter regarding deferral of impact analysis and mitigation.
- B2-2 See Responses to Comments B2-6 through B2-9 for responses to the detailed comments presented in Sections III and IV of this letter regarding off-site, regional, and indirect impacts.
- B2-3 See Responses to Comments B2-10 through B2-31 for responses to the detailed comments presented in Section V of this letter regarding the environmental impact analysis and proposed mitigation measures. Regarding comments related to the adequacy of project alternatives, see Responses to Comments B2-32 and B2-33. This comment also requests that the City recirculate a revised PEIR. See Response to Comment B2-34 for a response to the request presented in Section VII of this letter to recirculate a revised PEIR.

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To comply with the law and be certain the public and decisionmakers have adequate information to weigh and consider the effects of the proposed Project, the City must prepare and recirculate a revised Draft PEIR that properly analyzes reasonably foreseeable environmental impacts, on and off-site, and considers meaningful alternatives and mitigation measures to reduce such effects.

B2-4 1. Reliance on a Program EIR Improperly Defers Needed Evaluation and Mitigation for Already Detailed Projects and Reasonably Foreseeable Environmental Effects

CEQA requires that environmental impacts be specifically identified and mitigated at the earliest possible date in order to "inform the public and responsible officials of the environmental consequences of their decisions before they are made." (Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal. 3d 553, 564.) A program EIR is intended to offer several environmental advantages, including allowing "the lead agency to consider broad policy alternatives and program wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts." (14 Cal. Code Regs., § 15168 (b).)

Tiering from a program EIR, however, does not excuse the lead agency from adequately analyzing reasonably foreseeable significant environmental effects of the project, and does not justify deferring such analysis to a later tier EIR or negative declaration. (14 Cal. Code Regs., § 15152 (b)) Properly used, a program EIR must meaningfully consider all reasonably foreseeable environmental effects of a project, while deferring later CEQA review only where the "EIR cannot provide meaningful information about a speculative future project." (Pala Band of Mission Indians v. County of San Diego (1998) 68 Cal. App. 4th 556, 577.) This approach allows an agency to tier or phase environmental analysis of a project as the proposal evolves over time. (14 Cal. Code Regs., § 15152)

The PEIR here improperly relies on tiering as "a device for <u>deferring identification of significant environmental impacts."</u> [emphasis added] (*Stanislaus Natural Heritage Project v. County of Stanislaus* (1996) 48 Cal.App.4th 182, 199.) An agency is not allowed to simply state that "information will be provided in the future"; the EIR must analyze all reasonably foreseeable significant environmental effects. (*California Clean Energy Committee v. City of Woodland* 225 Cal.App.4th at 200.) Mitigation measures also cannot be deferred to later tiers to address reasonably foreseeable effects; the "[f]ormulation of mitigation measures should not be deferred until some future time." (14 Cal. Code Regs., § 15126.4(a)(1)(B), *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 307.)

The Draft PEIR defers evaluation of reasonably foreseeable impacts repeatedly where its plans and implementing projects are each sufficiently detailed and well-described to permit considerable impact assessment. While the Introduction states that "the Plans do not provide for any specific location, design, or extent of grading," in fact the location of the proposed projects and some additional specific design elements are regularly proposed. Where assessed, the PEIR significantly limits consideration of the effects of proposed recommendations to just a few of the modifications. (e.g. Table 5.2-1) The impacts of implementing actions are not so speculative that they cannot be substantially evaluated in this PEIR.

B2-4 The PEIR presents a programmatic evaluation of environmental impacts consistent with CEQA as further described in Section 1.2.2. The PEIR does not defer mitigation or identification of significant impacts. Rather, the PEIR identifies potentially significant impacts which may result from implementation of the Plans and identifies a programmatic Mitigation Framework that would be applied to future projects to ensure potentially significant impacts are reduced to less than significant.

This comment implies that the PEIR improperly relies on tiering and defers evaluation and mitigation of impacts. Chapter 1.0 (Introduction) includes information about the intended use of the PEIR, including the program-level impact analysis (Section 1.2.2) in accordance with CEQA Section 15168 for the Project and a brief description of the subsequent review process for future projects implemented in accordance with the adopted Plans. Furthermore, the Mitigation Framework to be adopted in conjunction with the Plans describes that subsequent projects implemented in accordance with the Plans would be subject to discretionary review by the City, as well as project-level environmental review in accordance with State CEQA Guidelines Section 15168. This approach is consistent with CEQA Guidelines Sections 15152, 15153, and 15168 which provide for consideration of environmental effects from subsequent actions at the project-level.

Chapter 3.0 (Project Description) includes a detailed project scope and provides the basis for the environmental analysis found in Chapter 5 of the PEIR for the Plans and associated discretionary actions. This Chapter also introduces park-wide policies and recommendations as presented in Figures 3.4 through 3-9, some of which would become future projects, but are general in nature and do not include site specific design that could allow for meaningful environmental analysis at the program-level. The PEIR presents a programmatic evaluation of environmental impacts associated with

	Table.
	B2-4 (cont.) plan implementation consistent with CEQA, and a Mitigation Framework to guide the subsequent environmental review process. No further revisions to the Final PEIR are required.
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Overall, the PEIR is regularly used to gloss over and defer evaluation and mitigation of reasonably foreseeable effects. The PEIR should be revised and recirculated to evaluate the reasonably foreseeable impacts of the Project's specific proposed actions while properly considering "broad policy alternatives and program wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts."

B2-5 II. The PEIR Regularly Fails to Evaluate all Components of the Project

As stated in the Project description, the Project includes: (1) certification of the Program EIR; (2) Adoption of Mission Trails Regional Park Master Plan Update; (3) Adoption of Natural Resources Management Plan; (4) Adoption of Community Plan and Precise Plan Amendments. (PEIR p. 3-1) However, the PEIR fails to evaluate the effect of, for example, amendments to the Community Plans, or even disclose what they are. By stating the Plans "as an integrated set of management guidelines for the Park," the PEIR fails in an information/ disclosure role by failing to describe the actual Plans and the proposed modifications to Plans; and to evaluate the impacts of the proposed adoptions and modifications in the EIR. As the California Supreme Court has held that information buried in appendices report is not a substitute for disclosure and a good faith reasoned analysis in an EIR, the attachment of such plans fails to cure these omissions. (Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova (2007) 40 Cal.4th 412, 442.)

B2-6 III. The PEIR Fails to Adequately Evaluate Off- Site, Regional and Indirect Impacts of the Project

An adequate EIR must evaluate *all* potentially significant environmental impacts of a proposed project, including direct and indirect impacts, short-term and long-term impacts, on-site and off-site impacts, local and regional impacts, and cumulative impacts. (14 Cal. Code of Regs., §§ 15126, 15126.2, 15130) The Draft PEIR prepared for this Project fails throughout the document to evaluate and disclose off-site, regional indirect, and other reasonably foreseeable Project impacts. The PEIR must be revised and recirculated to address these glaring omissions.

The PEIR fails to evaluate impacts to connecting areas and trails. Such effects may include safety impacts (e.g. from off-site trespass to MCAS Miramar), biological impacts from increased use of adjacent areas, land use impacts from inconsistencies with planning documents, traffic impacts, etc. For example, the PEIR states recreational goals to extend the San Diego River Pathway, a Trans-County Trail, and the proposed Stowe Trail, among others; yet off-site impacts to these other corridors have not been evaluated. (PEIR p. 3-16, 3-24) The PEIR also inadequately considers off-site, indirect, and regional impacts to long range planning, e.g., the San Diego River Park Master Plan.

As another example, the West Sycamore area, provides only 6 miles of recreational trails but connects to much more extensive trail systems within the Goodan Ranch and Sycamore Canyon Preserve to the east, Transcounty Trail 28 (northwest and northeast), trails within the

B2-5 As described in Section 1.1 of the PEIR, the adoption and implementation of technical amendments to the Tierrasanta, Navajo, and East Elliott Community Plans, as well as the Rancho Encantada Precise Plan "are necessary to update or correct maps and community plan language required as part of project approval. The amendments would ensure that policy recommendations in the community plans with regards to the management of the Park are consistent with updated policies in the MPU and NRMP." Consequently, these amendments would simply ensure policy and mapping consistency between the Plans and the Tierrasanta, Navajo, and East Elliott Community Plans and Rancho Encantada Precise Plan, and would not result in any physical changes that would result in new environmental impacts that were not analyzed in the PFIR.

The PEIR provides adequate detail of the Plans in Section 3.2, including overall objectives of the MPU and NRMP (Section 3.1), a thorough description of MPU park-wide policies (Section 3.2.2.1) and MPU area policies (Section 3.2.2.2), as well as a discussion of the NRMP objectives, NRMP adaptive management approach, and NRMP prioritization system for management actions (Section 3.2.3).

B2-6 Chapter 8, Cumulative Impacts, of the PEIR provides an adequate evaluation of off-site, regional indirect, and other reasonably foreseeable project impacts. Stakeholder outreach during the trail planning process included several public workshops, pre-public draft MPU and public draft MPU review, Draft PEIR Notice of Preparation and a public Scoping Meeting, etc. A full list of the City's outreach efforts on the project can be found in MPU Appendix B – Public Process Summary.

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B2-6 (cont.)

The PEIR adequately analyzes potential indirect impacts associated with trail connections to off-site areas at a program level. As detailed in Section 5.1.4 of the PEIR under Issue 3, the City's MHPA Land Use Adjacency Guidelines would be applied during implementation of all future projects to address potential indirect impacts. Potential impacts resulting from introduction of invasive species into the MHPA (Impact BIO-6) would be reduced to less than significant through implementation of MM-LU-1 as detailed in Section 5.1, Land Use, of the PEIR. As detailed therein, all subsequent projects would be subject to CEQA review and compliance with the Plans, the City's Biology Guidelines, MSCP Subarea Plan, and the Landscape Standards in the Land Development Manual, including the prohibitions on the use of invasive plant species.

Furthermore, it should be noted that recommendations included in the MPU to encourage and support providing regional trail linkages would not result in construction of any off-site trails. Off-site trails would be constructed by the agency responsible for the off-site trail and would need to be covered under a separate environmental document. Only trails within the proposed MPU project area would be considered covered projects for compliance with the MPU and NRMP and would require subsequent review in accordance with CEQA and the City's Land Development Code.

Regarding potential safety impacts, implementation of the MPU recommendations would reduce potential off-site trespass to MCAS Miramar compared to the existing conditions by implementing several recommendations intended to reduce trespass onto MCAS Miramar (see for example, Fortuna Mountain Recommendation H1 and East Elliott Recommendations R6 - R9, R14, R25 – R27).

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B2-6 (cont.)

The PEIR evaluates land use consistency in Section 5.1 including consistency of the project with the City's General Plan, relevant Community Plans (and Precise Plan), ESL Regulations, Historical Resources Regulations, and the MSCP Subarea Plan. No off-site traffic impacts have been identified.

This comment states that proposed connectivity with the San Diego River Trail, the Trans-County Trail, the proposed Stowe Trail, and others would result in off-site impacts. However, the pedestrian use that would be offered by the connectivity proposed under the project would not adversely affect these trails. The proposed regional trail connections have been evaluated by the applicable agencies and planned to provide regional connections. The MPU recommendations do not propose regional trail connections that are not already planned and anticipated by other agencies (e.g., County of San Diego Trails Master Plan). Furthermore, implementation of the Plans would more likely reduce potential off-site impacts from trail use because the MPU includes more recommendations that address trail closures, trail reroutes, signage, and fencing with the goal of controlling and limiting unauthorized trail use both within the Park boundaries and off-site. Unauthorized use of trails is part of the existing condition and the proposed Plans include several recommendations intended to deter public use of unauthorized trails, while providing regional connections in appropriate locations. All proposed improvements identified in the MPU and NRMP would be subject to site-specific, subsequent environmental analysis and would be subject to the PEIR Mitigation Framework. No revisions to the Final PEIR are required.

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canyon and watershed northeast of Scripps Poway Parkway, Marthas Grove trail (including unauthorized portions) and other areas which the Project's proposed improvements including new connections to these systems would effect. (See, PEIR p. 2-34) The Project would specifically add connecting trails to access Goodan Ranch at the south end (R4) and acquire an access easement at the interaction of Beeler Canyon Road and Sycamore Canyon Road to construct a trailhead with informational kiosk (F2) for accesses to Transcounty Trail and others. Offsite impacts and regional impacts of the Project modifications must be considered.

B2-7

Another major off-site consideration not adequately evaluated in the PEIR would include the impact of accomplishing Mission Gorge Area Planning Recommendation P3- the acquisition and subsequent trail modifications of the 200 acres to the south of Mission Gorge Road currently not a part of the site. What effects to safety (crossing Mission Gorge Road, additional rock climbing), biological resources, aesthetics, traffic, etc. of the addition of this area to the Park?

B2-8

The PEIR also regularly fails to evaluate any indirect impacts of the Projects. The PEIR must be revised and recirculated to address these omissions.

B2-9

IV. The PEIR fails to Adequately Consider Near-Term and Long-Term Impacts to East Elliot Area where Full Acquisition Has Not Yet Occurred

CEQA requires an EIR evaluate "[d]irect and indirect significant effects of the project on the environment ... giving due consideration to both the short-term and long-term effects." (14 Cal. Code Regs., § 15126.2(a).) The East Elliot area is currently predominantly (67%) owned by private companies and individuals who have development rights within the area. While there are no Park facilities in this area, substantial unauthorized trails presently cross privately owned parcels, as well as MCAS Miramar, without formal planning and design. (PEIR p. 2-12 [22.25 miles of unauthorized trails in East Elliot area])

While the PEIR plans for this area to become acquired as part of the Park and for unauthorized trails to be closed, the PEIR fails to evaluate near-term impacts where it is highly likely trespass and unauthorized trail access will continue to occur on these parcels in the near-term until the parcels are acquired and authorized trails are developed. The PEIR should evaluate and mitigate for effects to this area not only at final buildout, should it be effectuated, but in the near-term and at various stages of land acquisition. The PEIR should also consider plans and alternatives to buildout of this area. At present, the PEIR describes no contingencies for the stated plans in the event these privately owned parcels remain in private use either temporarily or permanently.

B2-10 V. The PEIR Fails to Adequately Evaluate and Mitigate Impacts

In addition to these overarching errors and omissions, the PEIR's evaluation and mitigation measures proposed fall short for the reasons detailed below.

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- B2-7 Mission Gorge Area Recommendation P3 refers to a 200+ acre area on Kwaay Paay peak that is located within the boundaries of the Mission Gorge area. The recommendation does not refer to acquisition and subsequent trail modifications of any land outside of the proposed Park boundaries evaluated in the environmental document. As shown on Figure 3-6 of the PEIR, the land associated with recommendation P3 is located north of Mission Gorge Road, not south of Mission Gorge Road as stated in the comment. The referenced area south of Mission Gorge Road is part of the Cowles Mountain area. Impacts referenced in the comment are addressed in Chapter 5 of the DEIR.
- B2-8 Refer to Response to Comment B2-6. No revisions to the Final PEIR are required.
- The continuation of impacts within the East Elliott Area where full B2-9 acquisition has not yet occurred would not be the result of the project. Impacts associated with "trespass and unauthorized trail access" in this area currently exists and would continue with or without the project. The PEIR appropriately evaluates impacts of the project by evaluating the anticipated result of build-out of the Plans against the existing condition, which includes unauthorized use of trails. The MPU cannot guarantee acquisition of all parcels within East Elliott, and as such, the plan includes a recommendation recognizing the rights of private property owners to develop properties consistent with the community plan, MSCP Subarea Plan requirements, and the Mission Trails Design District Ordinance (EE-P1). MPU recommendation EE-P2 states that the City would continue to acquire land from willing sellers, or through development agreements for park expansion, and for MSCP habitat conservation purposes. The PEIR appropriately evaluates potential East Elliott improvements that could occur as land is acquired. In the event properties are not acquired, they would remain as private holdings and could be developed in accordance with existing regulations as detailed in recommendation EE-P1. No additional analysis is warranted.

THIS PAGE INTENTIONALLY LEFT BLANK	B2-10 PEIR Section 5.1.7 states that, "[T]]he Mitigation Framework requires site-specific environmental review, analysis of potential impacts, and recommendations for mitigation to reduce significant impacts related to consistency with the City's MHPA to below a level of significance." This site-specific review and recommendations for mitigation would include appropriate maintenance requirements. Compliance with the MSCP Subarea Plan/MHPA Land Use Adjacency Guidelines would be assured through the subsequent project review process implemented in accordance with the Mitigation Framework; specifically, Mitigation Measure LU-1 that would reduce impacts to less than significant with respect to drainage, toxics, lighting, noise, barriers, invasives, brush management, and grading/land development to ensure compliance with the City's MHPA Land Use Adjacency Guidelines (MSCP Section 1.4 Land Use Considerations and Section 1.5 Framework Mitigation Plan). Maintenance of drainage systems within the Park would be performed in accordance with the provisions of the MPU.
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a. Land Use

Mitigation Measure MM LU-1 proposes uncertain, vague, and unenforceable measures where it requires systems be maintained "approximately" once a year, regularly, or "where applicable." Maintenance should be required a minimum of one a year and alternatives should be affirmatively required to be included.

B2-11 b. Visual Effects and Neighborhood Character

The PEIR fails to evaluate the effects of light sources from park users, such as headlamps and headlights from hikers and bikers. Mitigation should include enforcement to prevent night use of the Project to reduce light and glare impacts.

B2-12 c. Air Quality and GHGs

The Air Quality analysis states that, operationally, the Project will not generate new trips but would only "redistribute a small amount of traffic." (PFIR p. 5.3-11) The traffic analysis, however, acknowledges an increase in daily trips from the parking areas. (PEIR p. 5.11-15 through p.5.11-17) The Air Quality Analysis must be re-run to account for the increase in trips, and appropriate mitigation proposed.

B2-13

The Air Quality and Traffic Analyses also fail to consider air quality impacts from traffic and dust from the addition of new trailhead locations that do not include development of new parking areas. New trailhead locations will generate and increase street or off-road parking at those locations, and generate associated traffic and vehicle trips. The air quality implications from these mobile sources and dust must be analyzed.

d. Biological Resources

- B2-14

 As noted in the letter prepared by Hamilton Biological, Inc., modifications to the existing Mission Trails Regional Park must be shown to be consistent with the Multiple Species Conservation Plan (MSCP) Subarea Plan (SAP) such that there is no net loss of habitat value or acreage for the Covered Species. (SAP Section 9.19 of Implementation Plan). If there is any net loss of habitat value or acreage for the covered species, such modifications should not be made. Further, the PEIR must disclose the inconsistency may result in a significant impact requiring mitigation.
- B2-15

 As further noted in the Hamilton letter, the City is required to implement all the alleged "priority 1" directives as a condition of the City's MSCP Take Authorization. To the extent these priorities may not be executed or may be delayed, the PEIR must evaluate and mitigate for potential significant effects to biological resources.
- B2-16 The PEIR acknowledges significant unauthorized trail use currently exists throughout the park and proposes closures to certain trails (e.g., East Elliot- 22.25 miles- unauthorized (p. 2-12; Cowles

- B2-11 See Response to Comment A2-49 regarding park hours and lighting devices. Future projects implemented in accordance with the MPU may require installation of lighting for parking area safety, and to illuminate signs and kiosks. These elements would be designed to direct light away from open space areas and sensitive species in compliance with the City's Outdoor Lighting Regulations (LDC Section 142.0740) and the MSCP MHPA Land Use Adjacency Guidelines as further described in Section 5.2.3 under Issue 5 of the PEIR. Also in response to this comment, the Light and Glare (Issue 5) discussion on Page 5.2-10 has been revised to provide clarification regarding park hours of operation; specifically, that only the parking areas are closed at night, but the Park is not.
- B2-12 The Air Quality analysis (PEIR Section 5.3) accurately reflects the project components associated with the four MPU recommendations related to construction of additional visitor parking to accommodate existing and future users of the Park. The parking areas are intended to reduce some of the parking demand in the residential areas surrounding the Park, and would not, in and of themselves generate additional trips in the region. Although the MPU's anticipated improvements could attract and accommodate additional visitors, for the purpose of the air quality analysis, and based on how parking is currently distributed within and surrounding the Park, future construction of the additional parking areas would not result in an increase in operational emissions, and no mitigation is required.

As stated above and in PEIR Section 5.11.4, implementation of the MPU could attract and accommodate additional users to the Park; however, any increase in Park use would likely occur with or without the improvements based on regional population growth and demand for increased park space. The analysis therefore, focuses on whether the redistribution of trips on surrounding roadways due to the future construction of new parking facilities would result in a significant impact. For this reason, because project-level design of future improvements is unknown at this

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B2-12 (cont.)

time, the discussion under Issue 2: Circulation and Access concluded that impacts would be significant and mitigation is required. See Mitigation Framework MM-TRAF-1.

- See Response to Comment B2-12. Fugitive dust is addressed under B2-13 Issue 2: Ambient Air Quality/Sensitive Receptors in Chapter 5.3 Air Quality in the PEIR. Additionally, according to the Parks & Recreation Department, trail work is generally conducted during the rainy season, by hand, taking advantage of the wet soil to minimize dust and ensure long term trail durability, stability, and sustainability. Furthermore, or when dry-weather construction is necessary, by implementing applicable Best Management Practices (BMPs) such as those found in the City's WHITEBOOK (2018) which is applied to City-initiated projects, along with regulatory compliance and trail construction industry standards, impacts would be below a level of significance. In response to this comment information has been incorporated into the impact discussion to provide further clarification regarding trail construction methodology and regulatory compliance.
- B2-14 See Responses to Comments, A2-10, 16, 43, 57, 60, and B1-7. Section 9.19 of the MSCP Implementing Agreement (not the Implementation Plan) references the need for "no net loss of habitat value or acreage" specifically related to modifications of the "regulatory protections or legal encumbrances" proposed by the City 'following the end of the term of this Agreement.' The reference to "no net loss" in the context of this comment does not apply to the Project.

Future projects implemented in accordance with the Plans would require subsequent review in accordance with CEQA, including but not limited to, project-specific evaluation of biological resource impacts and review for consistency with the MSCP Subarea Plan.

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B2-14 (cont.)

Impacts to biological resources (including MSCP covered species and MHPA areas) would be avoided, minimized, and/or mitigated in accordance with all applicable local, state, and federal requirements. Project-level review and analysis would therefore ensure that no-net loss of habitat value would occur in conjunction with subsequent project implementation.

- B2-15 See Responses to Comments, A2-43, 57, 60, and B1-7. Section 3.2 of the NRMP includes each Priority 1 MSCP Directive for MTRP along with a description of what has been, is on-going, or will be done to accomplish the MSCP Directive. The PEIR is a programmatic document. Each subsequent individual project would be evaluated for consistency by MSCP staff with all relevant sections of the City of San Diego's MSCP Subarea Plan including but not limited to: Section 1.2.2. Eastern Area; Section 1.4.1 Compatible Land Uses (Including Section 1.4.3 MSCP Land Use Adjacency Guidelines); Section 1.5.2 General Management Directives (including Public Access, Trails and Recreation Priority 1 & 2 items); Section 1.5.6 Specific Management Policies and Directives for the Eastern Area (East Elliott and Mission Trails Regional Park Priority 1 and 2 issues); and Section 1.6 Protection of Resources.
- B2-16 See Responses to Comments A2-12 and A2-39. It should be noted that future unauthorized trails are not a component of the Project and are not necessarily foreseeable impacts of the Project. Where applicable however, the MPU would formalize currently unauthorized/unpermitted trails in the Park or close ones where the use patterns are adversely affecting sensitive biological, archaeological or tribal cultural resources. The MPU also recognizes the effects of unauthorized trail use in the Park and the need to protect natural and cultural resources. As such, Section 5.1.3 of the MPU includes Management Recommendation 14 to "[C]onduct regular patrols of the park and enforce park rules, regulations and boundaries." Continued active enforcement by Park Ranger staff reduces unauthorized trail creation and use throughout the park, including the areas within East Elliott.

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B2-17

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B2-22

Mountain – 1.02 miles unauthorized (p. 2-9); etc.) There are no enforceable mitigation measures and conditions proposed, however, to curtail and mitigate for future unauthorized trail creation and use. At a minimum, mitigation must be incorporated to provide routine patrols to enforce trail regulations, particularly within the East Elliot Area. In addition, the PEIR must evaluate how and whether the unauthorized trail use has modified the biological needs of the area in order to achieve the goals of the MSCP. Further, any new trails in these areas or other proposed modifications may worsen or exacerbate an already harmful, subpar condition. The PEIR must consider these issues.

B2-18

The proposal for new trails fails to comply with the Priority 1 directive that no new trails should be cut through existing habitat. The PEIR should evaluate and disclose how the creation of some new trails is inconsistent with the City's MSCP Take Authorization for the Park.

B2-19

As further noted in the Hamilton letter, the wildlife agencies have expressed concerns that the plan detailed in the PEIR would not satisfy the requirements of the MSCP SAP by failing to maintain adequate areas isolated from human disturbance. The PEIR must evaluate, disclose, and avoid or mitigate for the adverse effect to biological resources of failing to accomplish these essential requirements, particularly within the East Elliot area. The PEIR also must evaluate, disclose, and mitigate for impacts from inconsistencies with the MSCP from inadequate isolation, as well as from failing to situate proposed projects (trails, overlooks, staging areas) in the least sensitive areas of the Park.

Lastly, as noted in the Hamilton letter, the PEIR fails to consider Project actions that conflict with an adopted habitat conservation plan where it omits consideration of the MSCP SAP and its Framework Management Plan. The PEIR must be revised and recirculated to consider consistency with the plans.

e. Historical Resources

Historical Resources surveys last occurred over 20 years ago. Given the significant unauthorized trail use at present, surveys should be updated in those unauthorized disturbance areas in addition to updates in the areas proposed for future actions, as both are likely to be impacted by Project use.

Mitigation to reduce impacts to historic and prehistoric resources should also include enforcement of on-trail use. At present, significant unauthorized use exists which may be significantly impacting historical and prehistoric resources. Enforcement against future unauthorized uses will be key to protecting historical resources.

f. Human Health, Public Safety, and Hazardous Materials

The PEIR acknowledges significant unauthorized trail use currently exists in the East Elliot area-22.25 miles—an area with substantial potential unexploded ordnance (23 detected locations in the Fortuna Mountain and East Elliot areas). (PEIR p. 5.7-10) Mitigation Measure MM-Haz-2 only applies to subsequent projects contemplated by the plans, not indirect impacts of continuing to introduce people B2-17 See Responses to Comments A2-12, 43, 57, 60, B1-7 and B2-16. The biological analysis in the PEIR is based on existing conditions in the Park, including the presence of unauthorized trails and was used to inform the development of the MPU efforts to strike a balance between resource management and recreational uses in the Park. Newly proposed trails would be subject to subsequent site specific environmental analysis consistent with the Mitigation Framework. Through this process, impacts associated with new trail construction would be identified, avoided, and/or reduced to below a level of significance with applicable mitigation in accordance with the City's Biology Guidelines and MSCP Subarea Plan.

B2-18 The MSCP Subarea Plan Section 1.5.2, General Management Directives, Public Access, Trails, and Recreation Priority 1 directive specifically states, "Locate trails, overlooks, and staging areas in the least-sensitive areas in MHPA", It does not however preclude the construction of new trails. The reference cited by the commenter that no new trails should be cut through existing habitat is a directive specific to Del Mar Mesa (see MSCP Subarea Plan Page 84, NCFUA Subarea 5, Priority 1, #1), and therefore does not apply to MTRP. Furthermore, the Specific Management Directives for the Eastern Area, including MTRP and East Elliott address coordination with MSCP planners during Master Plan implementation associated with trail design and siting to minimize habitat destruction and trail edge effects. As such, the Recommendations and Policies addressing sensitive trail siting/design are included in the MPU to ensure consistency with the MSCP Subarea Plan.

B2-19 See Responses to Comments A2-43, 57, 60, B1-7, and B2-18.

B2-20 See Responses to Comments A2-43, 57, 60, B1-7, B2-15, B2-18, and B2-19.

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As noted in PEIR Section 5.6 - Historical Resources, a records search B2-21 and literature review was conducted for the Project, which identified a total of 173 recorded cultural resources reflecting the major themes of prehistory, mining, transportation, ranching, and military activity within the MPU boundaries. This information provided a baseline for which the programmatic Mitigation Framework was developed and requiring subsequent future projects to implement, addressing potential significant impacts to Historical Resources (PEIR Section 5.6.6). Specifically, measure MM HIST-1a requires project-level consultation under AB 52, the preparation of an evaluation report including background research, field survey, and archaeological testing (when applicable) to determine significance in accordance with CEQA and the City's Historical Resources Regulations and Guidelines, and identification of appropriate mitigation measures. Surveys therefore, would be updated at the project level to address potential impacts associated with proposed improvements or restoration efforts in accordance with both the MPU and NRMP.

See Responses to Comments A2-12 and B2-16 regarding enforcement of unauthorized trail use. It should also be noted that City Park Ranger staff conduct regular patrols throughout the Park for authorized and unauthorized trail uses. Any required enforcement efforts are applied in either case to address potential issues related to historical, archaeological and tribal cultural resources in consultation with qualified City staff.

B2-22 Risks associated with unauthorized trail use within East Elliott in areas where potential unexploded ordinance (UXO) could be encountered would not be the result of the project. This is an existing condition fully disclosed in the PEIR. Efforts by the Army Corps of Engineers (ACOE) to survey, identify and remove UXO within East Elliott are on-going. Notification of UXO removal activities by the ACOE is provided to the City in advance of such efforts and is coordinated with City Park Rangers.

THIS PAGE INTENTIONALLY LEFT BLANK	B2-22 (cont.) The PEIR evaluates the potential impacts associated with the recommendations contained within the Plans. The effect of existing unauthorized trail use is outside the scope of the document. Newly proposed trails would be subject to subsequent site specific environmental analysis consistent with the Mitigation Framework. Through this process, impacts associated with new trail construction would be identified, avoided, and/or reduced to below a level of significance with applicable mitigation in accordance with the City's Biology Guidelines and MSCP Subarea Plan. Also see Responses to Comments A2-12, B2-16 and B2-17.
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to the area, which risks increasing and/or modifying unauthorized accesses in this area. There is no solution proposed to curtail and mitigate for future unauthorized trail creation and use in this area. Mitigation involving regular enforcement patrols or other means should be proposed in the PEIR and adopted by the City.

B2-23

Similarly, safety with continuing and potentially increased unauthorized use of MCAS Miramar is inadequately evaluated and impacts inadequately mitigated.

B2-24

The Project proposes to expand the Mission Gorge area south of Mission Gorge Road. The PEIR fails to evaluate safety impacts of such an expansion where parking areas are currently located across this 5-lane roadway with its 55 MPH speed limits. (PEIR p. 5.11-17) The PEIR's review of impacts to health and safety hazards is too limited where it considers only the impacts from the risk of wildland fires and implementation of an emergency response plan.

g. Hydrology/ Water Quality

B2-25

The evaluation of off-site impacts is essential to adequate consideration of Project effects to hydrology and water quality. The Project bounds numerous unconsidered waterways and watersheds, the impacts to which must be evaluated.

Runoff impacts from parking off-road in areas adjacent to proposed new trailheads should also be evaluated in the PEIR. The PEIR currently considers only the implementation of new parking areas to reduce current impacts, not the potential creation of similar unimproved areas on and adjacent to the Project site.

B2-26

The PEIR should also consider impacts from development of proposed bridge areas at the Project site. Impacts in these areas are reasonably foreseeable and should be disclosed and mitigation adopted at this PEIR level, in addition to when development occurs.

h. Traffie/Circulation

B2-27

The PEIR should consider capacity impacts from the subsequent projects that could attract and accommodate additional visitors, not solely new parking facilities. For instance, new trailheads and on- and off- street parking in those locations should be evaluated in the PEIR. The PEIR fails to consider the traffic effects of Fortuna Mountain Area Planning Recommendations P2 and P3, for example, if a new trailhead and staging facility is developed as proposed. Similarly, the West Sycamore Canyon Area facility recommendation F2 proposes acquisition of an access easement at a location where presently no parking, but instead equestrian uses exist. What traffic and circulation effects would result from these new access points?

The PEIR also improperly fails to evaluate and defers consideration of circulation and access impacts re: at parking areas and access points, stating subsequent projects are so "conceptual" in nature that impacts cannot be evaluated. (PEIR p. 5.11-18) However, the location and proposed design of such

- B2-23 See Response to Comment B2-22.
- B2-24 Safety associated with the parking area at Mission Gorge Road (MPU Recommendation CM-F2) and Father Junipero Serra Trail (MPU Recommendation MG-F6) is discussed in PEIR Section 5.11.4, Issue 3 (Parking). As stated therein, the proposed Father Junipero Serra Trail parking area would eliminate an existing safety hazard that results when Park users illegally cross Mission Gorge Road on foot to access the Park. No impacts associated with parking hazards would occur.
- This comment implies that in addition to proposed parking areas, B2-25 there is a potential for park visitors to use unimproved off-site areas for parking, and that the effect of this unauthorized parking should be included in the evaluation of run-off from parking areas. The PEIR evaluates the potential impacts associated with the recommendations contained within the Plans. The effect of unauthorized off-site parking is outside the scope of the document. PEIR Section 5.8.4, Issue 1 (Runoff and Drainage) provides an adequate assessment of whether impacts would occur from proposed changes to off-site drainage patterns. If necessary, future implemented in accordance with the MPU projects Recommendations would be required to implement measures identified in the Mitigation Framework demonstrating compliance with the City's Storm Water Standards to reduce significant runoff impacts within the Park boundary, or in off-site areas.

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- B2-26 Proposed pedestrian/ bicycle bridges are shown as part of build-out of the MPU (see MPU Figures 6-7 through 7-12). As detailed in PEIR Section 5.8.6, the Mitigation Framework requires all future projects (i.e., construction of pedestrian/bicycle bridges) to be designed to comply with all regulatory requirements, and include BMPs in accordance with the City's Storm Water Standards to assure any impacts resulting from storm water run-off is less than significant. This impact analysis would be conducted at the project level.
- Refer to Response to Comment B2-13. Fortuna Mountain B2-27 Recommendations P2 and P3 would provide trailhead improvements allowing access to existing trails that are already accessible to the public from the MTRP Tierrasanta entrance at the eastern end of Clairemont Mesa Boulevard, from Calle De Vida, and from the Mission Trails Rim Trailhead at Calle De Vida and Colina Dorada Drive. Recommendations P2 and P3 would formalize this area with a trailhead and staging area but would not result in an increase in trail users as there is already ample on-street and offstreet parking at these trailheads to access the trail network in this area. Similarly, the West Sycamore Recommendation would construct a trailhead and informational kiosk at an existing trailhead location. This would not result in an increase in trail usage and thus, would not increase trips in the area. PEIR impacts are adequately evaluated to the degree that specific improvements are identified. However, specific habitat (and other) impacts from construction of proposed parking areas cannot be determined at this time as there are no detailed plans available to allow an accurate calculation of impacts. Accordingly, the PEIR provides a Mitigation Framework requiring implementation of future project level analysis to identify, avoid and reduce potential impacts in accordance with CEQA and all applicable regulatory requirements, and is not considered a deferred evaluation.

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points is known and disclosed in the PEIR; according, traffic impacts in these areas are reasonably foreseeable and must be evaluated at this stage.

The PEIR fails to evaluate impacts regarding the availability of parking at proposed new trailheads, considering instead only new parking areas being recommended. Additional impacts to parking may occur in new access areas.

Mitigation Measure MM-Traf-1 lists measures to be considered, but does not require any of the listed alternatives be implemented, or establish performance standards be met to ensure impacts are reduced below a level of significance. The conclusion that impacts will be mitigated to less than significant is not supported absent adequate evaluation, and incorporation of certain mitigation.

i. Public Services

B2-29 The PEIR inadequately considers and discloses impacts to fire response times where the focus is only on SDFD and Santee Fire; but where the jurisdictions of Poway, Santee, La Mesa, El Cajon, County of San Diego, Lemon Grove, and La Mesa may likewise be effected.

The PEIR also fails to consider potential impacts (i.e. from trespass), if any, to the small solar array located in the East Elliot area when considering effects to utilities.

i. Noise

The PEIR does not include an evaluation of noise impacts as the NOP evidently stated such impacts would be less than significant. Given the increase in park users and traffic as noted in the Traffic/ Circulation section, this impact should be deemed potentially significant and such effects evaluated in the PEIR, Noise impacts to wildlife and residences adjacent to proposed new trail connections and access points are of particular importance. Noise sources may include recreational activities (i.e. music. talking, bike bells) and vehicles, among other sources.

VI. Alternatives

B2-28

B2-30

B2-31

B2-32

The proposed rejection of the Reduced Project Alternative as preferred to the Project and environmentally superior for failing to reduce impacts is reliant on the falsehood that the Project as proposed would also comply with the MSCP and SAP. As discussed above, the PEIR failed to adequately consider inconsistencies. Impacts to biological resources would be significantly reduced through the adoption of the Reduced Project Alternative while still meeting most Project objectives, such that it should be implemented in lieu of the Project, This alternative would also reduce the safety effects of UXO and trespass on MCAS Miramar. The conclusion that the Project is environmentally preferred to this alternative lacks support because the significant effects of the Project were inadequately addressed.

As a programmatic document, the PEIR provides a Mitigation B2-28 Framework to be implemented at the time subsequent projects are designed and submitted for formal review in accordance with CEQA and the City's Land Development Code. Mitigation Framework Measure MM-TRAF-1 requires that subsequent projects implemented in accordance with the MPU with the potential to alter existing circulation or affect existing access points submit a detailed analysis, design plans, and other requirements recommended by the City Engineer to reduce impacts to below a level of significance. The provision of additional mitigation measures is not precluded; however, this would be determined at the project level. The PEIR conclusion that impacts associated with circulation and access would be less than significant is based upon future projects implementing the requirements of the Mitigation Framework, and represents an adequate conclusion pursuant to CEQA Guidelines Section 15168 relating to programmatic documents (see PEIR Section 1.2.2).

B2-29 As noted in the comment, the jurisdictions of Poway, Santee, La Mesa, El Cajon, and the County of San Diego are adjacent to the Park, which is served by the San Diego Fire-Rescue Department (SDFD). Section 5.12 of the PEIR discloses that while the majority of the Project is within the boundaries of the SDFD, mutual aid agreements exist between the fire agencies serving the affected jurisdictions to ensure adequate service provision. Additionally, according to the Standards of Response Cover Review prepared for the SDFD by Citygate Associates, LLC (Citygate Study, 2017), SDFD's Response Plan for wildland fires during high fire hazard conditions provides adequate coverage. SDFD is also a signatory to the San Diego County and California Mutual Aid Agreement ensuring adequate coverage to minimize the City's wildland fire impact severity exclusive of a large-scale event involving multiple operational periods or multiple serious concurrent events.

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B-29 (cont.)

The PEIR adequately and accurately focuses on whether the project would result in a need for new or expanded facilities. While other fire districts exist nearby and could provide ancillary assistance in emergency situations, implementation of recommendations in the MPU and NRMP would not increase demand for new or expanded facilities, nor warrant an analysis of new facility requirements associated with adjacent jurisdictions.

- B2-30 The threshold discussion related to impacts to public utilities is whether implementation of the Plans would result in the need for new utilities or a need for substantial expansion or alteration of existing facilities. Trespass on the solar site is not related to the Plans and is outside the scope of the PEIR.
- B2-31 Pursuant to CEQA Guidelines Section 15128, Chapter 9 of the PEIR discusses the issue areas which would not have the potential to result in significant impacts, as determined during the initial environmental review and scoping process. Noise impacts were determined not to be significant and are addressed in PEIR Section 9.3.

Contrary to the comment, the traffic section of the PEIR (Section 5.11) stated that traffic (trip generation) would not increase as a result of the Project. See Response to Comment B2-12.

With respect to noise impacts on wildlife, PEIR Section 5.5.4(c) identifies that if subsequent projects contemplated by the MPU (such as trails or recreational amenities) are proposed adjacent to the MHPA, there is a potential for indirect impacts, including noise, to occur. The Mitigation Framework described in the Biology and Land Use sections of the PEIR would be implemented to reduce potential indirect impacts to below a level of significance. Short term construction noise impacts would likewise be mitigated through implementation of the Mitigation Framework measures as noted above.

	B2-31 (cont.)
	Noise associated with use of trails and amenities proposed under the MPU would be intermittent and would not generate sustained noise levels that could result in significant impacts to wildlife and nearby residences necessitating mitigation.
THIS PAGE INTENTIONALLY LEFT BLANK	B2-32 See Responses to Comments A2-6, A2-9, and A2-44. PEIR Section 10.3.2.1 clearly states that the Reduced Project Alternative could result in potential conflicts with the MHPA Land Use Adjacency Guidelines related to construction noise or introduction of recreational users. This impact is similar to the proposed project. The Reduced Project Alternative would also result in slightly less impacts on biological resources when compared to the proposed project because fewer trails and associated amenities would be constructed and would also be required to implement the same Mitigation Framework measures identified in Section 5.5. When compared to the proposed project, implementation of the Reduced Project Alternative would reduce the extent of grading and potential disturbance of UXO or other hazardous material sites associated with new trail construction and associated amenities. However, similar to biological resources, the Reduced Project Alternative would also result in significant impacts and be required to implement the Mitigation Framework measures identified in Section 5.7. Furthermore, the Reduced Project Alternative is clearly identified as the Environmentally Superior Alternative in Section 10.4 of the PEIR.

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B2-33

Alternatively, the PEIR also fails to consider a reasonable range of Project alternatives where the only alternative considered in addition to the mandatory no project alternative allegedly fails to reduce significant environmental impacts compared to the Project. The purpose of the alternatives analysis is to consider alternatives that would avoid or substantially lessen the significant effects of the project. (Guidelines § 15126.6) According to the PEIR, the proposed Reduced Project Alternative fails to achieve this basic objective of CEQA's alternative analysis. Accordingly, additional alternatives must be considered.

Any additional alternative should be considered in conjunction with the Wildlife Agencies to ensure compliance with all the requirements of the MSCP. Considerations of any alternative should include not inserting additional trail alignments in this sensitive core areas of Oak Canyon and the southern portion of the East Elliot areas, and insulating these areas from human access and related disturbances to reduce biological impacts.

VII. Conclusion

B2-34

The Draft PEIR should be revised and recirculated to address the significant errors and omission cited above. Thank you for your consideration of these comments.

Sincerely.

JOHNSON, SMITH & FOY

B2-33 The alternatives analysis has been prepared in accordance with CEQA Section 15126.6 and includes a reasonable range of alternatives to the project. As stated in this CEQA section, "An EIR need not consider every conceivable alternative to a project. Rather, it must consider a reasonable range of feasible alternatives that will foster informed decision making and public participation." As demonstrated in the PEIR, there is adequate variation among the alternatives. As required under CEQA, the Reduced Project Alternative would avoid or minimize significant impacts associated with the project while also meeting some project objectives. The alternatives are compared to the impacts of the project and are assessed relative to their ability to meet the basic objectives of the project. No additional alternatives are required.

B2-34 The PEIR, which has been prepared in accordance with CEQA, adequately addresses potential impacts associated with implementation of the Plans and does not require substantial revision and recirculation.

Letter B3

California Native Plant Society

San Diego Chapter of the California Native Plant Society
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March 8, 2017

Myra Herrmann Environmental Planner, City of San Diego Planning Department 1010 Second Avenue, MS 413, San Diego, CA 92101

by email to PlanningCEQA@sandiego.gov

RE: Mission Trails Regional Park Master Plan Update/Natural Resources Management Plan/Community Plan Technical Amendments Project No. 349988 / SCH No. 2014041011

Dear Ms. Herrmann.

B3-1

B3-2

Thank you for the opportunity to comment on the draft of the City of San Diego's ("City") Mission Trails Regional Park ("MTRP") Master Plan Update ("MPU") and Natural Resources Management Plan ("NRMP") and its associated Programmatic Environmental Impact Report ("PEIR"). CNPS promotes sound plant science as the backbone of effective natural areas protection. We work closely with decision-makers, scientists, and local planners to advocate for well informed and environmentally friendly policies, regulations, and land management practices. Our focus is on plants, vegetation, and climate change as it affects both.

While we appreciate that the MPU and NRMP updates are progressing, they and the PEIR contain serious errors that need to be fixed. The simplest solution is to revise and recirculate the Draft PEIR. We hope these comments will help improve the next version.

First, we are very concerned that the PEIR consists largely of boilerplate language from existing City regulations and standards. In our understanding, the purpose of a PEIR is to analyze issues common to the entire program, so that subsequent project EIRs tiering off of it can rely on the previous analysis and not have to repeat it. As we understand this, the only reasonable excuse for not doing this is that the impacts are unforeseeable. In the PEIR, there are issues such as those listed below that are totally predictable and completely analyzable in a PEIR. In these documents, the analysis is largely lacking, making it ineffective as a PEIR. We strongly advise revising the EIR to include as many impact analyses and mitigations as possible, to make it effective as a PEIR. This will make the document more effective, by eliminating duplicate analyses from subsequent EIRs tiering off of it. This analysis is one reason why the PEIR should be revised and recirculated.



- B3-1 Comment noted. Individual comments related to the PEIR and CEQA deficiencies are addressed specifically in the comments that follow.
- See Response to Comment B2-4. As stated on Page 1-5 B3-2 (Introduction) the PEIR contains a program-level analysis of the MPU, NRMP and Community Plan Amendments ("Project") pursuant to CEQA Guidelines Section 15168. The PEIR analyzes broad environmental effects that are reasonably foreseeable if the MPU is implemented, and also avoids duplicative reconsideration of policy with subsequent projects implemented in accordance with the MPU. Additionally, the program-level analysis for the MPU establishes the criteria for subsequent, project-specific analysis once details are known and technical studies have been prepared. These are further detailed in the Mitigation Framework, often citing requirements for compliance with City regulations (i.e., Land Development Code) and standards (i.e., Land Development Manual) assuring consistency during subsequent project review. A tiered approach is appropriate for this type of project. For the reasons stated above, the PEIR does not require recirculation.

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Second, CNPSSD strongly supports and advocates for the Reduced Project B3-3 Alternative to the MPU. The U.S. Fish and Wildlife Service ("USFWS"), the California Department of Fish and Wildlife ("CDFW") both made it clear that the MPU as proposed did not fully meet the City's obligations under the Multiple Species Conservation Program ("MSCP"). In failing to fully answer these issues in its preferred alternative, the City did not make a case for why the Preferred Project Alternative was superior to the Reduced Project Alternative. It is obvious that the City does not wish to consider the Reduced Project alternative, as the analysis is

scant and there is not even a map of that alternative. This is inadequate. Were this an EIR for a commercial development, we presume the City would require such an oversight to be corrected. Please apply the same standards to City business that you would to the commercial sector, and properly analyze all the alternatives, so that City Council can make an informed choice.

B3-4

Third, the PEIR makes a serious error in the way it handles sensitive species and vegetation communities. Yes, the text is boilerplate, but here is how it would work in real life.

• Sensitive species are being impacted by trails, both authorized and unauthorized.

• Trails, especially unauthorized trails, shall be closed.

• Closure of trails will result in impacts to sensitive species. These impacts may be substantial (IMP BIO-5).

• These impacts will be mitigated following standard City protocol (MM-BIO-1).

• Standard protocol requires that greater than 1:1 mitigation for impacts. If there is not room in the Park, mitigation will be done off-site.

It appears that, in order to save sensitive species in Mission Trails, it is okay to destroy them in Mission Trails and try to find a population outside a park to preserve instead. The unspoken and untenable assumption is that there are other, unpreserved populations that could be used for such mitigation, and there is no analysis to see if these are true. Given that MTRP is a core area in the MSCP, the better assumption is that it is false, and that MTRP should be treated as a preserve first and foremost.

What all this boilerplate says is that the Department of Parks and Recreation ("Parks") is not committed to preserving the species within Mission Trails. Where is the analysis of these totally predictable impacts?

You may argue that this is all boilerplate, but for the last two years, I have watched this very mess play out on Del Mar Mesa, following implementation of that NRMP. I have been a Parks volunteer on Del Mar Mesa since 2011, keeping up the trails and trying to keep people from destroying the place. Parks caused more damage in a weekend than the mountain bikers had in my entire time there. Here is what happened.

Following the Del Mar Mesa NRMP, in late 2015, a crew of untrained men from the Alpha Project were hired to brush closed two trails, without supervision by even a ranger, let alone a competent biologist (I encountered them). The plants they tore down included a large number of living List 1.B summer hollies (Comarostaphylis diversifolia), and they dumped the dead and live branches on the two trails to be closed. One trail was reopened by mountain bikers within a week. The other stayed mostly closed for a year, but it is now reopened, with a new trail going around the old brushed areas. Despite the reopenings, both trails remain very lightly used. Nonetheless, Parks is now deciding how to close those trails again, even though they acknowledge how destructive it is, even though my own surveys in the area show that they don't have enough dead wood remaining to brush the trails closed again. Most of it is either keeping an old trail closed or too broken by repeated movements to be useful. The Del Mar Mesa NRMP gives them no option but to keep attempting to close the trails.

See Responses to Comments A2-6, A2-9, A2-44, and B1-9. Pursuant B3-3 to CEQA, an EIR must evaluate the comparative merits of alternatives. CEQA Guidelines Section 15126.6(d) requires sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. The significant effects of the alternative are required to be discussed, but in less detail than the significant effects of the proposed project. The specific differences between the Reduced Project Alternative (determined to be the Environmentally Superior Alternative) are discussed in detail in PEIR Section 10.3. To further clarify what trail alignment would be removed under the Reduced Project Alternative (a map of the alternative), refer to the trail that coincides with Recreation Recommendation R4 on Figure 3-8 of the PEIR. Additionally, for clarity, Alternatives section 10.3.1 has been revised to reference this Figure and the associated recommendation. The description provides adequate detail to allow the conclusion that the Reduced Project Alternative would not completely avoid any of the identified significant and mitigable impacts of the Project.

> The discussion of this analysis provides adequate comparative information for the City discretionary hearing bodies to make an informed decision.

B3-4 The Plans have been developed as an integrated set of management guidelines for the Park, with the MPU focusing on public access and recreation and the NRMP focusing on the natural resources, addressing the long-term protection of natural resources and development goals in support of recreation and interpretation within the Park. The NRMP fulfills the MSCP requirement to develop ASMDs for the protection of natural resources within the Park. The City is committed to preserving and protecting sensitive species within the Park and as such, subsequent projects implemented in accordance with the MPU and NRMP would require a site-specific evaluation demonstrating

B3-5

	B3-4 (cont.) compliance with the Plans and all applicable regulations, standards, and guidelines as further described in the Mitigation Framework to be adopted in conjunction with the Plans. The Biological Mitigation Framework described in PEIR Section 5.5.6 includes feasible mitigation in the form of regulatory and plan compliance (e.g., ESL Regulations, MSCP Subarea Plan Consistency, etc.) for subsequent project review which would assure that potential future impacts to biological resources would be less than significant. Furthermore, Section 6.1.1.4 of the MPU explains that mitigation may occur within the Park in the form of habitat restoration, creation, and enhancements. While mitigation within the Park would be preferred, off-site mitigation pursuant to the MSCP mitigation ratios and location of mitigation lands is allowed. The ability to mitigate off-site is contingent on whether the proposed mitigation meets applicable local, state, and federal requirements. Also see Response to Comment B3-2.
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B3-6

The key problem with these documents is that they set no priorities and allow no variances. Phrases such as "trails *shall* be closed" order park employees to close a trail, no matter how destructive that project is, no matter how many times it is reopened, no matter how many alternative trails are cut around it, no matter how many weeds invade the now highly disturbed site. Even if the action is disastrously ineffective, it *shall* be repeated indefinitely.

B3-7

To be very, very clear, we at CNPSSD am **not** arguing against closing trails. It would be wonderful to see all the problematic trails go away. However, many years of experience have taught that this is an unrealistic goal, that crude efforts to close trails can end up harming the populations of rare plants that the trail closures sought to protect, in some cases more than the original trails did.

B3-8

The realistic goal is to minimize human impacts to the point where sensitive species can tolerate them. Zero impacts is often unachievable, but radically decreasing impacts is entirely possible. That is often good enough for sensitive plant species.

Here is how to achieve that goal: species protection is a goal, fencing is a strategy. Treat them differently.

- 1. Make preservation of sensitive species and sensitive vegetation communities the top priority, following the MSCP. This is not to be regarded as a win for the environmentalists and a loss for the mountain biking community, but rather as a way to stop pointless destruction, especially through mandatory trail (re)closures and an endless struggle against vandalism of fences and the actions of scofflaws. Without a statement of priority, closing trails and building fences has an equal priority with preserving sensitive species, whether or not those closures or fences cause more harm than they prevent. As I have seen on Del Mar Mesa, mandating trail closures means that at times park employees will tool up to build fences and close trails, other times they will tool up to work with sensitive species, and these are regarded as separate tasks that both must be done, no matter how one will impact the other. The employees ignore the effects of either action on the other because to do their jobs, they need to follow orders and fulfill objectives. They are not paid to think through the consequences—that is the job of the people writing the MPU, the NRMP, and the PEIR.
- 2. Use this priority to drive adaptive management: specifically use this priority to determine the best means to preserve the sensitive resources. Often, prioritizing the protection of sensitive species or vegetation communities will mean building fences and closing trails. Sometimes it will mean working with the environmental and mountain biking communities to determine workable alternatives, whether they are reroutes, fencing, signage, or whatever. Sometimes it will mean doing nothing. Always it will mean monitoring what happens next, to assess and respond to the impacts, because fences get will cut, signs will get vandalized, trails get reopened or rerouted, and weeds will invade disturbed sites. Moreover, if trail closures or other actions do not work or are too destructive, MTRP can adapt its strategies and work to find better solutions. Without adaptive management, it would be necessary to modify the NRMP and Master Plan to deal with the new problems, and that process is far too cumbersome to respond to even annual changes.

B3-9

Again, this is not to demean the mountain biking community. Indeed, one large source of friction at Del Mar Mesa comes from inept trail closures, and I understand this to be true at MTRP as well. Many mountain bikers identify as environmentalists, and they are enraged when trail closures result in needless destruction, such as large living shrubs cut down and laid whole on the trail, especially when it is done in a way that the trail can be reopened in a matter of minutes. Destructive activities by the City decreases their legitimacy in the eyes of trail users,

- B3-6 It's not clear in what context the commenter is referring with respect to the term "shall", but the intent of the MPU is to provide guidance for potential future projects, while the NRMP provides enforceable direction to assure that ASMDs for the protection of natural resources at MTRP are being achieved. Where the term "shall" is used in the context of a Mitigation Framework measure, this is to ensure that future project-level review and analysis is conducted in accordance with the MPU, NRMP, and all applicable regulatory requirements in accordance with CEQA and the City's Land Development Code.
- B3-7 Comment noted. See Response to Comment B3-6.
- B3-8 Comment noted. As described in MPU Section 6.2, the MPU prioritizes trail closures and restoration recommendations throughout the Park. The NRMP establishes an adaptive management approach which is a systematic process for managing in the face of uncertainty (i.e., when best management practices are lacking) and continually improving management policies and practices by learning from the outcomes of operational procedures. If operational procedures are not meeting management goals, methods are adjusted until they are achieved. This approach would be responsive to potentially changing needs and priorities for the natural and cultural resources in the Park.

B3-9 Comment noted.

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and this is critically important. For the MPU and NRMP to work, the City needs to be seen as a smart, proactive protector of natural resources and promoter of outdoor education and recreation, not tarred as a bunch of thoughtless, destructive bureaucrats.

Note that preservation of other resources (historical, archaeological, etc.) can take equal high priority with preservation of biological resources, if this works to enable their preservation through adaptive management. However, CNPS has no expertise with these resources, so we cannot comment effectively on whether prioritization can be extended to cover them.

A fourth issue is private land ownership. We know that the relationship between the private land owners in East Elliott and the City appears quite contentious. Unfortunately, the relationship is not accurately represented in the MPU or the NRMP. It needs to be.

One simple problem is it is impossible to tell where the private parcels are in East Elliott. The main unauthorized trails in East Elliott go across multiple property boundaries, but it is unclear where these boundaries are. There are similar problems on Del Mar Mesa, and it leads to both contention and confusion when only a few people actually know who owns which parcel of land, and trails wander promiscuously through multiple parcels. In the MTRP, this sloppiness is unacceptable. The City should be in the business of insuring that everybody's property lines are respected. Please make the boundaries and ownership of each parcel explicit in more maps, especially those related to proposed projects.

In the NRMP, with the apparent absence of parcel boundaries, it appears that Parks is the sole owner of the trails of East Elliott, and that it can close them at will. However, Parks personnel will be sharply limited to working on City land and with cooperating private landowners. Is there a statement where the other property owners agree to abide by the MPU or NRMP? Will they, or will they build their houses, trails be damned? Is it even possible for the proposed new trails in the Preferred Project to be built, or do they wander onto private land?

This is the kind of confusion that results from sloppy mapping. We strongly suggest that the City clarify where its ownership boundaries truly are, and redo maps as necessary to make this clear. Paradoxically this will make it much easier to close trails that wander onto private land, simply because it allows the City to honestly claim that it is protecting property owners' rights when it helps them close off unwanted trails. Moreover, it will make protection of species such as the endangered willowy monardella (Monardella viminea) much simpler, because it will clarify which plants are on City land and therefore under direct City protection and management, and which are on private land and therefore subject to a different regulatory environment.

A fifth issue is that invasive species are dealt with inadequately in the MPU and PEIR. Obviously, disturbance will result in opening space for non-native invasive plants. Unfortunately, the MPU says that invasive plants will not be a problem because (MM-LU-l, p. ES-9/33) "No invasive nonnative plant species would be introduced into areas adjacent to the MHPA." Why is this considered adequate or even more than wishful thinking?

The NRMP at least recognizes that non-native invasives are an ongoing management problem that will be exacerbated by the disturbance caused by any project inside the park. Such disturbance will require years of post-construction monitoring and management to insure that any weeds that do show up do not become established, spreading infestations. This is actually simple, as using a hoe to kill a few seedlings is massively cheaper than hirring a green to use herbicide on acres of type converted vegetation. The needs for invasives management MUST be included in the MPU, and its impacts must be analyzed in the PEIR. Why are they not there?

B3-10 Comment noted. PEIR Section 5.6.6 provides a Mitigation Framework for the protection of Historical and Tribal Cultural Resources.

B3-11 Comment noted. Figure 3-37 of the MPU shows the location of private property ownership within East Elliott. No other figures in the MPU have been modified in response to this comment.

3-12 See Response to Comment B2-6. Additionally, the Plans, as well as the PEIR acknowledge the significance of, and need to control invasive plants (See also MPU Habitat/Species Recommendation 8).

As such, Land Use PEIR Mitigation Framework measure LU-1 requires review for compliance with the MSCP/MPHA Land Use Adjacency Guidelines for subsequent projects implemented in accordance with the MPU that would introduce additional recreational uses within or adjacent to the MHPA which could lead to invasive plant growth. Implementation of MM-LU-1 would require action to be taken (appropriate to the project) to assure that no invasive nonnative plant species would be introduced into areas within or adjacent to the MHPA. The NRMP provides the framework for ongoing management and monitoring to ensure weed eradication is effective. Overall, the Park plans work together to assure that invasive plants are eradicated, and implementation of the Mitigation Framework identified in the PEIR for impacts associated with invasive plants would be less than significant.

B3-12

B3-10

B3-11

Page 5 of 5

B3-13

Second, Missions Trails and all parks face massive threats from new non-natives, such as the gold spotted oak borer (Agrilus coxalis) and especially the Polyphagous and Kuroshio Shot Hole borers (Euwallacea spp. Http://ucanr.edu/sites/pshb/). The latter two species are a serious threat, as they appear to preferentially attack cottonwoods (Populus spp.), sycamores (Platanus spp.) and willows (Salix spp.), although they attack over 60 other species, including most oaks, a large variety of street trees and ornamentals, and avocadoes. Shot Hole Borers killed more than 140,000 trees in nine months in the Tijuana River Valley (http://www.cw6sandiego.com/newlydiscovered-beetle-decimates-trees-tijuana-river-valley/), and they have been found in Balboa Park (4.5 miles from the MTRP) and Sycuan golf course (8 miles from the MTRP). Currently there is no effective control for them. If they become established at MTRP, they will decimate all the riparian forests in the park. Detection and rapid response are the best ways to stop an incipient invasion, and promulgating regulations that campers should use charcoal rather than haul firewood into the park are at present the best ways to keep the beetles out, for the beetles are spread by movement of infested firewood. If the City does not want to be faced with millions of dollars in tree removal costs (it's not like the beetles will stay in MTRP, after all), and the threat of major fires from dead wood buildup if the trees are not removed, then the MPU and NRMP need to analyze the impacts of monitoring for and managing invasive bark beetle and other emerging pests going forward. Catching infestations early currently is the only way to control them.

B3-14

Third, CNPSSD has been using of the Bradley method of weed control and restoration for years (e.g. http://www.aabr.org.au/learn/what-i-bush-regeneration/general-principles/the-bradley-method/). It is simpler and cheaper than conventional restoration, and our restoration costs are generally less than \$1500/acre in places like Lusardi Creek. The Bradley method has converted acres dominated by non-natives like cardoon (*Cynara cardunculus*) back to coastal sage scrub. While it is much slower than conventional restoration, in places where it can work (which already have some natives present), it works extremely well. We are happy to share this method with the City, simply because we believe it is more efficient and cost-effective. We strongly suggest that the Bradley method be included in the NRMP as a restoration strategy, and be included in the MPU as well.

Thank you for taking these comments. Please keep CNPSSD informed of all developments with this project, at conservation@cnpssd.org and franklandis03@yahoo.com.

Sincerely.

Frank Landis, PhD Conservation Chair

California Native Plant Society, San Diego

Chapter

B3-13 Comment noted. See Response to Comment A2-59.

B3-14 Comment noted. The PEIR provides adequate mitigation measures to protect against the introduction of invasive plant species within the MHPA. This method is currently used by the City as an operational BMP and does not need to be included in the NRMP.

Letter B4





Preserve Wild Santee

March 1, 2017

Myra Herrmann, Environmental Planner City of San Diego Planning Department, 1010 Second Avenue, MS 413 San Diego, CA 92101 PlanningCEQA@sandiego.gov

Re: Mission Trails Regional Park Master Plan Update/ Natural Resources Management Plan/Community Plan Technical Amendments EIR PROJECT No. 349988 / SCH No. 2014041011

Dear Ms. Herrmann,

B4-1 Preserve Wild Santee is concerned that the City and the Wildlife Agencies have not agreed upon a preferred Alternative that provides for recreational trails while adequately protecting the public resources that the Wildlife Agencies are directed to steward.

The City's authority to issue Incidental Take Permits is based upon the assumption that resources "covered" by the Multiple Species Conservation Plan (MSCP) are being managed sustainably.¹

"To remain in compliance with State and Federal permits for the City's MSCP Subarea Plan, the City must demonstrate the ability to manage the preserve areas in East Elliot, including enforcing trail closures where necessary, to achieve the goals of the MSCP for the covered species addressed by the plan."

"...the basis for accepting MSCP preserve lands as mitigation for impacts to covered species includes the commitment to manage the lands so that habitat conditions for wildlife are sustained or improved and are not degraded by recreational use."

Unfortunately, evidence demonstrates that adequate and sustainable management of resources is deficient; yet "take" permits continue to be issued. The growing pressure on

¹ Goebel and Sevrens, Wildlife Agency Letter to Alyssa Muto, City of San Diego, January 20, 2017. B4-1 Comment noted.

biological resources, especially on land considered conserved must be adequately addressed.

B4-2 Therefore, PWS requests that the draft Environmental Impact Report (DEIR) be <u>Recirculated after a Preferred Alternative is proposed that addresses Wildlife Agency concerns and corrects other deficiencies identified below.</u>

Biological Impacts:

- B4-3 Where are the maps of sensitive species for the entire park? Figures 5.5-7 and 5.5-8 provide mapped locations for sensitive species on the Tierrasanta or western side of the park, but similar maps for the remainder of the park appear to be absent in the draft EIR. Resources must be identified in order to be managed sustainably. Failure to do so, could allow potentially significant adverse impacts to biological resources. The maps would also aid in determining whether any specific trail route should be modified or abandoned.
- B4-4 There should be a trails map figure prepared for the Biologically Superior Alternative similar to Figure 3.3 Proposed Trail Build-out (pdf p. 121), to illustrate the differences between the Alternatives under consideration and better allow exploration of other solutions.

What does page 10-7 (quoted below) mean in mapped / illustrated graphic terms?

"The Reduced Project Alternative would remove the proposed Sycamore Canyon connection and the trail alignment that would extend along the western boundary of the Park. This would result in two smaller trail loops in the western portion of the East Elliot area...the Wildlife Agencies requested removal of the trail alignment that would pass through the Oak Canyon/State Route 52 area...The Reduced Project Alternative would also remove the proposed east-west trail alignment south of Sycamore Landfill."

Regardless of which trail plan alternative (or variation thereof) is adopted, specific resource protections, patrols, enforcement actions and resource education targeted toward trail users must be greatly increased to be consistent with the growing recreational demand's potential for significant resource impacts. The large increase in illegal trails is a significant adverse impact that is not adequately disclosed and addressed by the draft EIR. The illegal trails in both the current park and the East Elliott expansion area reflect a significant failure to manage resources consistent with the MSCP permit obligations. What specific measures will be adopted to address this issue and what specific financial resources will support them?

B4-2 See Responses to Comments B2-34 and B3-3. The PEIR has been prepared in accordance with CEQA, adequately addresses potential impacts, and does not require substantial revision and recirculation.

B4-3 PEIR Figures 5.5-2a through 5.5-2e illustrate at a program level all vegetation communities within the Park boundaries. This information is provided to demonstrate the potential for impacts to sensitive biological resources from projects or activities implemented in accordance with the MPU and NRMP. Furthermore, through the identification of these communities, the NRMP is able to provide more detailed management actions for specific ecological guilds. Specifically, Section 4.4 of the NRMP provides a detailed analysis of threats, conceptual modeling, and ASMDs for prioritized sensitive species management throughout the Park. Management actions are broken down by individual sensitive species, along with maps of known occurrences and management actions.

The MPU identifies potential locations where trail enhancement could occur. PEIR Figure 3-3 shows general locations for proposed trail buildout, illustrating closures, reroutes and new construction. The MPU provides planning guidance for future projects. New proposed trail alignments would be subject to site-specific biological review to ensure that the final location is sited in the least environmentally sensitive area(s) pursuant to the MSCP Subarea Plan and guidance provided in the adopted NRMP. Projects with potential impacts associated with development of new trails would be required to implement the Mitigation Framework detailed in PEIR Section 5.5.6.

The specific differences between the Reduced Project Alternative (determined to be the Environmentally Superior alternative) and

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Preserve Wild Santee

B4-4

	B4-4 (cont.) the Project are discussed in detail in PEIR Section 10.3. To further clarify what trail alignment would be removed under the Reduced
	Project Alternative, refer to the trail that coincides with Recreation Recommendation R4 on Figure 3-8 of the PEIR.
	In response to the comment, the Alternatives Section 10.3.1 has been revised to refer to this Figure and associated MPU recommendation. The description provides adequate detail to allow the conclusion that the Reduced Project Alternative would not completely avoid any of the identified significant impacts of the Project.
THIS PAGE INTENTIONALLY LEFT BLANK	B4-5 See Responses to Comments A2-8, A2-12, A2-72, and B2-16. Additionally, MPU East Elliott Management Recommendation M1 states, "Develop and implement a public information/education program regarding the MSCP-related habitat conservation requirements associated with acquired lands within East Elliott to deter illicit trail building." Section 6.1 of the MPU addresses funding
	sources for MPU and NRMP implementation.



Example of illegal trail constructed between Oak Canyon and Spring Canyon. Notice the disregard / contempt for the closure measure. Photo taken in Spring 2013.



View westward following the blue line from bottom to the top of the photo represents illegally constructed trail. The photo point in the first photo above is on the blue line in the lower third of this photo.

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3D view of the illegally constructed trail from Oak to Spring Canyon North of SR-52.

- B4-6 There are more vernal pools in the northeast portion of East Elliott than are documented. Many of them have been damaged by the illegally built trail identified for closure.² How will the vernal pools be restored and protected from similar impacts in the future?
- B4-7 While there have been many parcels acquired for park expansion west of the Sycamore Landfill, there has been a failure to actively pursue purchase of parcels east of the landfill. How will the park be expanded east of the landfill and how will the success or failure to acquire parcels impact the trail alternatives under consideration?

Conclusion:

B4-8 The draft Environmental Impact Report (DEIR) should be Re-circulated after a Preferred Alternative is proposed that addresses Wildlife Agency concerns. Specific resource protections, patrols, enforcement actions and resource education targeted toward trail users must be greatly increased to be consistent with the growing recreational demand's potential for significant resource impacts.

Sincerely.

Van K. Collinsworth, M.A. Resource Analyst/Executive Director

/s/ Richard W. Halsey, Director, California Chaparral Institute /s/ John Buse, Senior Counsel, Center for Biological Diversity

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The MPU includes recommendations that have been developed B4-6 which acknowledge the need to assess and restore vernal pools, habitats, and associated watersheds that may have been damaged because of encroachment, erosion, or trail conflicts in all areas of the Park where vernal pools, vernal pool species and associated habitats have been identified, including within the East Elliott area (e.g., MPU Recreation Recommendation EE-R28). Furthermore, the NRMP provides specific guidance for vernal pool management and restoration efforts. MTRP is also included as a covered project in the recently adopted Vernal Pool Habitat Conservation Plan (VPHCP), which includes management and monitoring requirements for the vernal pool complexes within the park boundaries.

> Although impacts to vernal pools and vernal pool species are not anticipated to occur, subsequent restoration efforts implemented in accordance with the MPU have the potential to impact this habitat (Impact BIO-7). Implementation of Mitigation Framework MM-BIO-3 will assure that restoration efforts are conducted in compliance with all applicable local, state, and federal requirements, including the recently adopted VPHCP.

This comment does not address the adequacy or accuracy of the B4-7 environmental document; however, the City offers the following in response to the comment:

> As stated in the MPU, the City of San Diego, along with other federal, state, local, private and non-profit land conservation partners, is actively pursuing the acquisition of land in the East Elliott area. Whether directly acquired or dedicated as part of the permitting process for land development, at least 75 percent of this area will be managed for habitat conservation purposes. As land is acquired or dedicated in fee or by easement within the East Elliott expansion area, it will become part of MTRP as shown in MPU Figure 2-4. Additionally, East Elliott Planning Recommendation P2

² https://www.youtube.com/watch?v=io04-cJkPpE

	B4-7 (cont.) states, "Continue to acquire land from willing sellers, or through development agreements for park expansion, and MSCP habitat conservation purposes". It should also be noted that the City cannot require private property owners to sell their land; however, if private property owners choose to develop within East Elliott, in accordance with the Plans or an alternative to the Project, the City can require easements to complete a trail segment in conjunction with the development review process as noted above in Planning Recommendation P2.
THIS PAGE INTENTIONALLY LEFT BLANK	B4-8 See Response to Comments A2-6, A2-9, A2-44, B1-9, B2-34, B4-2 and B3-3.

Letter B5

Fostering the protection and appreciation



birds, other wildlife and their habitats.

Myra Herrmann Senior Planner/Archaeologist/Tribal Liaison City of San Diego - Planning Department 1010 2nd Avenue, Suite 1200 Executive Complex East Tower, MS 413 San Diego, CA 92101

Dear Ms. Herrmann,

B5-1

B5-2

B5-3

The San Diego Audubon Society (SDAS) appreciates the opportunity to provide comments on the Draft Program Environmental Impact Report for the Mission Trails Regional Park Master Plan Update. The Society's mission is to protect birds, other wildlife, and their habitats.

The San Diego Audubon Society appreciates the value of Mission Trails Regional Park as both high quality habitat for plants and wildlife, as well as a critical recreational resource for residents and visitors of the City of San Diego and our region. As such, SDAS is very interested in seeing that the City's plans for future amenities are compatible with the responsible stewardship of the natural resources within Mission Trails Regional Park.

We have two primary concerns with the DPEIR and Natural Resources Management Plan as currently written: SDAS believes that increased recreational uses within Mission Trails Regional Park prescribed in the Master Plan Update would likely result in conflicts with land use guidelines for projects within or adjacent to the MHPA. SDAS feels that the claims of compliance with Sections 1.4 and 1.5 of the MSCP and claims of adequate future mitigation for impacts within the MHPA related to issues such as land use, drainage, access, toxic substances in runoff, lighting, noise, invasive plant species, grading, and brush management may be overstated. Impacts to wildlife and water quality are cumulative in nature, and best addressed programmatically up front, and not with later, project-specific review.

Second, SDAS believes that in order to ensure that MPU-related actions, improvements, or additional recreational do not result in interference with the nesting/foraging/movement of resident or migratory fish or wildlife species, the NRMP and future project-specific CEQA review and mitigation planning must honestly and fully consider seasonal closures and nest buffers restricting human use and presence during nesting / breading season. Only adaptive, resource avoidance-based mitigation measures like seasonal closures will adequately protect Mission Trails' sensitive biological resources.

Thanks again for the opportunity to comment on the DPEIR. We look forward to seeing further improvement in the Mission Trails Regional Park MPU and NRMP. In case of questions or follow-up, the undersigned can be reached at 619-224-4591 or peugh@cox.net.

Conservation Committee Chair

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B5-1 Comment noted.

B5-2 See Responses to Comments A2-43, 57, B1-7, B1-10, B1-11, B2-6, B2-10, B2-14, and B3-12. The MPU provides a policy framework for future management of the Park, while the NRMP is focused on management obligations for MSCP-covered species within the Park boundaries. Conflicts with environmental plan consistency and MHPA Land Use Adjacency Guidelines that could result from implementation of the Plans are discussed in Issue 3 in PEIR Section 5.1.4. Management actions contemplated by the NRMP would not conflict with the MHPA Land Use Adjacency Guidelines. These actions have been developed to specifically enhance sensitive habitat for sensitive plant and wildlife species.

> While subsequent projects implemented in accordance with the MPU would be required to adhere to MSCP Subarea Plan management directives, the introduction of additional recreational uses within or adjacent to the MHPA is identified as a significant impact (Impact LU-1) and future projects would be required to comply with Mitigation Framework MM-LU-1 as further described in Section 5.1.6 of the PEIR. Furthermore, Section 8.2 (Cumulative Impact Analysis) provides a thorough discussion of the cumulative impacts associated with adoption of the Plans and implementation of future (subsequent) projects. For example, Section 8.2.1 clearly states that "Subsequent projects implemented under the Plans would have the potential to result in land use adjacency conflicts with the MHPA; however, the Mitigation Framework would ensure each subsequent project reduces these conflicts to a less than significant level." Section 8.2.5 also discloses a cumulative impact to biological resources, noting that implementation of the NRMP, in conjunction with adherence to the Mitigation Framework identified in Section 5.5 (Biological Resources), would serve to protect and manage biological resources within the Park, and as such, would reduce potential cumulative impacts to less than significant.

Letter B6

From: CourtCovle@aol.com

To: PLN PlanningCEQA; Herrmann, Myra

Subject: Mission Trails Regional Master Plan Update, DPEIR and Cultural Resources report

Date: Wednesday, March 08, 2017 12:22:51 PM

Dear Ms. Herrmann (Myra),

B6-1
These comments on the Mission Trails Regional Master Plan Update (MPU) and Natural Resources Management Plan Draft Programmatic EIR (2016)(DPEIR) and RECON Cultural Resources Report (2016)(Cultural report) are timely submitted on behalf of Carmen Lucas, Kwaaymii Laguna Band of Indians. Please provide my office and Ms. Lucas with the FEIR, comments received and written responses to comment. She also respectfully requests that this comment letter be provided at this time to each of the members of the Mission Trails Regional Park Citizens' Advisory Committee.

Overall, Ms. Lucas would like to make three major observations:

- B6-2 First, that the MPU makes little effort to develop a coherent management framework for cultural/historic resources in the Park. In contrast, habitat, species and recreation are provided unique detailed sections with their own management frameworks and recommendations. Why are cultural/historic resources not treated with a similar level of respect and interest? Below, she makes several management recommendations which could form the basis for a management section for cultural/historic resources. Such a framework could result in improved management, better coordination with tribal entities and reduced impacts to such resources.
- B6-3 Second, preservation in place techniques and benchmarks are not well defined in the environmental and management documents or mitigation measures, despite this being a critical aspect of CEQA analysis for historical and tribal cultural resources (TCRs). Since this is not robustly analyzed at the programmatic level, it must be a specific component of anticipated future, project-specific analyses to ensure that the DPEIR's conclusions regarding less than significant impacts after mitigation are in fact accurate.
- B6-4 Third, as part of the planning effort, a policy or management recommendation should be adopted to remove and relocate utility and other infrastructure out of archaeological and tribal sites whenever possible and for those areas to be sensitively restored and managed moving forward. Similarly, consultation with tribes should occur before easements are renewed or granted. Just because a place may be "already disturbed," does not mean that it should be forever disturbed or disrespected. Sites that may have lost archaeological integrity may still retain integrity from a tribal perspective.
- B6-5 Specifically, Ms. Lucas offers the following comments, questions and suggestions to improve management recommendations and mitigation measures:

Has the San Diego River Conservancy (Conservancy) been consulted on the proposed MPU and if so what are their comments and concerns? What efforts have been to research the files of the Conservancy and Mission Trails Park (Park) for information regarding tribal use of and connections to the Park, including during Visitor Center construction and interpretation material development?

B6-6 Is recreation permitted in public drinking water sources, and is Lake Murray (a reservoir) such a source (Cultural report, page 13)? What is the quantity and nature of the chemicals that might be introduced from recreation into water sources?

B6-1 Comment noted.

B6-2 Comment noted. The MTRP Mission Statement also states, "Providing recreational and educational opportunities while protecting historical, cultural and natural resources for future generations." As such, the NRMP and MPU have been developed as an integrated set of management guidelines for the Park, with the NRMP focusing on the natural, cultural, and historical resources and the MPU focusing on public access and recreation. The MPU includes recommendations acknowledging the need to protect cultural resource sites within the Park, while at the same time providing for recreational opportunities. Additionally, the NRMP includes management directives for the protection of cultural/historic resources. These include Priority 1 (MSCP required directives) and enforcement actions.

To further protect historical and tribal cultural resources, the Mitigation Framework included in PEIR Section 5.6.6 would be implemented at the project-level in accordance with CEQA and the City's Land Development Code, Historical Resources Regulations. Compliance with the Mitigation Framework will ensure that potential impacts to resources are addressed early in the planning, design and review process in order to provide adequate protection and resource management.

B6-3 Section 5.6, Issue 4, of the PEIR identifies potential impacts associated with Tribal Cultural Resources. However, site specific analysis cannot be conducted at the program-level. This will occur once subsequent projects have been designed and submitted for formal review in accordance with CEQA and the City's Land Development Code. Therefore, future projects with the potential to impact historical and tribal cultural resources would be required to implement both management recommendations contained in the MPU (see Response to Comment B6-2) and Mitigation Framework MM-Hist1a, which provides a detailed process for the evaluation,

B6-4 THIS PAGE INTENTIONALLY LEFT BLANK with the MPU

B6-3 (cont.)

significance determination, and guidance regarding appropriate and feasible mitigation measures to assure that impacts to archaeological and tribal cultural resources would be reduced to below a level of significance.

Removal and relocation of existing utilities out of archaeological and tribal cultural resources sites is not a Recommendation in the MPU; specifically, because the City of San Diego does not own all the infrastructure in the Park, and as such, does not have the authority for their removal and relocation. Most of the existing utilities and infrastructure is owned and managed by SDG&E, the San Diego County Water Authority, and other applicable agencies. Any proposed work within existing easements is accomplished by each agency/utility entity, including the provision for addressing potential impacts to archaeological and tribal cultural resources. Any work outside existing easements requires coordination with City staff in conjunction with environmental review by the lead agency under CEQA. Maintenance and repair, and trail improvements along existing utility roads and easements are included as Facility Recommendations within many areas of MTRP. Tribal consultation pursuant to AB 52 would be required for Cityinitiated projects with a potential to impact archaeological and/or tribal cultural resources. Furthermore, PEIR Section 5.6, Issue 4, specifically addresses the need for consultation under AB 52 to identify tribal cultural resources not yet found and formally recorded in the Park that could be impacted by subsequent projects. Consultation under AB 52 early in the process will ensure ongoing tribal input for future projects implemented in accordance

	This comment does not address the adequacy or accuracy of the environmental document. It should be noted, however, that multiple public workshops were held in 2010-2011 during development of the MPU which provided an opportunity for input by the Conservancy (see MPU Section 4). Additionally, the public notice of preparation (NOP), and the notice of availability (NOA) for the Draft PEIR, Draft MPU, NRMP and CPA were mailed to the San Diego River Conservancy; however, no comments were received by the end of public review.
THIS PAGE INTENTIONALLY LEFT BLANK	Reservoir, based on the assessment of the State Water Resources Control Board (SWRCB), Division of Drinking Water [DDW] and the Public Utilities Department, that the specific activities are compatible with the primary function of the reservoir to serve as a drinking source water supply. In accordance with the Reservoir Recreation Permit issued by the SWRCB-DDW, the allowed activities are picnicking, walking, jogging, biking, special events (e.g., the annual 4th of July celebration), fishing, and boating. Additionally, as required by the City's Domestic Water Supply Permit, also issued by DDW, Murray Reservoir is routinely monitored for constituents of concern to the drinking water system including bacteria, protozoans, and a suite of chemicals.

Ms. Lucas notes that a tribal voice is missing from the description of Cultural Setting (Cultural report, pages 18-19). Such views should be folded in and reflect that tribes generally reject the archaeological interpretation of time periods as presented in the report and DPEIR; tribal Legends state that tribes have been here since the beginning of time. Please add. B6-12 Regarding Identification Efforts (Cultural report, pages 21-30), the DPEIR observes that the entire Park has not been surveyed, and the parts that have been surveyed were largely done 20 or more years ago (DPEIR, page 5.6-11). Thus, a proactive surveying and survey update program should be part of the management recommendations and those surveys should include qualified Native Monitors and use noninvasive techniques as appropriate, such as the use of Historic Human Remains Detection Canines in and around midden areas to help identify	B6-8	Comment noted. A park-wide management recommendation has
entire Park has not been surveyed, and the parts that have been surveyed were largely done 20 or more years ago (DPEIR, page 5.6-11). Thus, a proactive surveying and survey update program should be part of the management recommendations and those surveys should include qualified Native Monitors and use noninvasive techniques as appropriate, such as the		been added to MPU Section 5.1.3 that would allow access to traditional tribal use areas within the park in coordination with
ancestral remains. Please add.	B6-9	Park Ranger staff. All of the proposed trails within the East Elliott and West Sycamore areas are either multi-use trails or hike/bike trails that allow bicycles (see PEIR Figures 3-8 and 3-9). Bike only trails are not
B6-13 Cultural report, Table 1, Summary of Cultural Resources Within The Park, should break the "Bone/shell" column into two separate columns (faunal bone and shell) as these are different resource types. Also, a column should be added for Ancestral Human Remains and Grave Goods (acknowledging that the Cultural report, page 44, states that none have been found in the study area at this time but that there is a relatively high potential for them to be present).		proposed in the MPU. Potential impacts to tribal cultural and archaeological resources associated with proposed trails would be addressed early in the design phase pursuant to MPU Management Recommendation 5.1.3.4 which will assure the protection and
B6-14 Table 1 lists many isolates; many tribes do not recognize isolates. Instead of being isolated, they may actually be part of the whole, the cultural landscape or Traditional Cultural Property (TCP). How can nonarchaeological perspectives be better incorporated and reflected in the resource types?		management of cultural resources through proper planning for avoidance of significant impacts.
B6-15 What efforts have been made to identify and appropriately manage cultural landscapes or TCPs? Ms. Lucas notes that the project personnel included archaeologists alone and no	B6-10	Comment noted. See Response to Comment B6-3.

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- B6-11 The Cultural Setting (Section 3.2 of the Cultural Resources Report) provides a brief description of known prehistoric cultural traditions within the southern California coastal and inland regions. The City acknowledges that tribal legend is an important cultural attribute of the area's history, and as such, the tribal perspective has been added to Section 5.6.2.1a in the PEIR as recommended.
- City staff acknowledges that some of the field survey data used to B6-12 support the program-level analysis in the PEIR is over 20 years old. It should be noted that an updated records search was conducted for the Project to provide a baseline for determining cultural constraints within the Park boundaries; however, a comprehensive park-wide survey was not conducted for the program-level planning effort. As such, a Management Recommendation has been added to Section 5.1.3 in the MPU to consider future efforts to conduct park-wide cultural resources surveys including, but not limited to, the identification of potential tribal cultural landscapes within MTRP. The PEIR includes a Mitigation Framework requiring site-specific surveys upon implementation of future projects that could result in impacts to historical, archaeological, and tribal cultural resources. Additionally, the Mitigation Framework also includes the requirement for Native American participation during all phases of archaeological investigations. The methodology used for a site-specific survey would be determined at the project-level and could include forensic canines if requested during the tribal consultation process. (see Mitigation Framework - Section 5.6.6 of the PEIR).
- B6-13 Comment noted. The information provided in Table 1 was derived from State of California Department of Parks and Recreation (DPR) Primary Record forms and not from the project-specific details one would find in the associated technical report. As such, the information in Table 1 provides a summary of materials encountered during prior investigations for the purpose of identifying resource types in the Park and determining the level of

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B6-13 (cont.)

sensitivity/significance for this program-level analysis. Table 1 has not been revised as suggested, as it would not change the results of the environmental analysis. Additionally, section 5.6 of the PEIR acknowledges the potential to encounter human remains in the MPU area and as such includes the requirement for consultation under AB 52 to ensure tribal resources are addressed early in the project and environmental review process. Furthermore, Step Three in the Mitigation Framework specifically addresses potential impacts to human remains and grave goods (see PEIR Section 5.6.6, MM-HIST-1a) including the provision for compliance with the California Public Resources Code (Section 5097.98) and the State Health and Safety Code (Section 7050.5).

- B6-14 Comment noted. It is recognized that isolates may be part of a broader cultural landscape. The identification of isolates, however, allow a starting point for consideration of potential future impacts during subsequent project review and discussion during the tribal consultation process, which could trigger the requirement for additional mitigation measures including monitoring to assure that unknown or buried cultural resources are protected and/or identified.
- B6-15 See Response to Comment B6-12. It should be noted that consultation in accordance with SB 18 and AB 52 was conducted with the lipay Nation of Santa Ysabel. The project scope and proposed mitigation framework was discussed, and agreement was reached regarding proper treatment of Tribal Cultural Resources at both the program-level and associated with future subsequent projects, and no further consultation was required. Furthermore, MM-HIST-1a requires tribal consultation in accordance with AB 52 for future projects implemented in accordance with the adopted MPU where there is a potential to impact tribal cultural resources or archaeological sites that could also be tribal cultural resources.

evidence of personnel qualified to identify TCPs or other tribally significant properties which may not have archaeological components. (Cultural report, page 16). It would seem that this planning effort would be a very appropriate time to concurrently work on cultural landscape planning, since a major focus of this planning effort is to implement provisions of the MSCP, a natural landscape planning effort. Oftentimes, natural and cultural landscapes are inextricably linked; in fact, the National Park Service includes natural components as part of the cultural landscape definition. See: https://www.nps/tps/how-to-preserve/briefs/36-cultural-landscapes.htm.

- Why have approximately 105 known cultural resources not yet been evaluated for historical determination? (Cultural report, page 1). In the absence of such determinations, what assurance is there that the resources are being appropriately managed, particularly those for which recreational use or public access impacts may be occurring or intensifying? Please address.
- B6-17 For the tribal historical properties that have been determined eligible for the Register, under what criteria were they determined significant? Were tribal monitors included on the test excavations? Have those efforts been written up? Ms. Lucas recommends that tribal sites be evaluated under all four criteria (and for properties to be reevaluated under all the criteria), that qualified tribal monitors be present during all surveys and testing, that affiliated tribes be involved in resource evaluations and that reports be timely prepared. Each of these should be folded into the management recommendation and mitigation frameworks.
- B6-18 She notes at Cultural report page 38, that forms of "innovative" survey techniques are referenced. To this list, she recommends adding Historic Human Remains Detection Canines, LiDAR, etc.
- B6-19 It also should be noted that archaeological testing itself is an adverse effect and should be avoided if other methods of evaluation are available and may not be an appropriate method for evaluating TCRs including midden soils. Please incorporate.
- Cultural report, Table 2, Status and Location of Cultural Resources Within the Park, she observes a number of known sites have been listed as impacted: destroyed by SR-52, impacted by development and trails, disturbed by road construction, destroyed by a parking lot, destroyed by firebreak, partially impacted by homes, etc. Were those impacts mitigated? If so, how? Do such prior impacts and categories of projects cumulatively affect sites and the collective cultural landscape in the Park? How can the MPU develop a cumulative mitigation framework that makes sense to tribes? This should be a management recommendation.
- B6-21 The Cultural report states that site form data and an aerial photograph were used to assess status and location of known resources. (Cultural report, page 27). Part of the management recommendations should be to regularly *physically* monitor the status and site conditions of these resources.
- B6-22 All site, locational and use information should also be confidential pursuant to state and federal law. This should be incorporated into management recommendations.
- B6-23

 Cultural report, Mitigation Framework, Step 1 should be revised to add that qualified Native
 Monitor or Tribal Representatives will also be involved in the evaluation of significance. Step 2

 should reference that part of AB 52 consultation is to be regarding the kind of environmental document to be prepared. Also, mitigation pursuant to AB 52 should not be limited to archaeological mitigation as outlined in the report, but rather, is to be determined through

- Please see Responses to Comments B6-3, B6-14 and B6-15. B6-16 Although sites have been identified and recorded based on past survey efforts in the Park, significance determinations have not been made in all cases because there was no proposed project with the potential to impact the resource(s) in these areas. However, as future projects are proposed, implementation of the Mitigation Framework would be required which includes consultation under AB 52, review of record search information, and preliminary determination of the potential to result in a significant impact to site(s). Tribal consultation could conceivably result in a recommendation to preserve a site through redesign or other means. If preservation cannot be accomplished, then further evaluation would be required, and mitigation proposed and agreed to by all parties to the consultation. Through implementation of the Mitigation Framework, appropriate mitigation and/or management of resources would occur, and impacts would be reduced to below a level of significance at the project level.
- B6-17 Five cultural resources have been determined eligible for listing on the California Register of Historical Resources consisting of one prehistoric site (CA-SDI-203/bedrock milling with artifact scatter), one prehistoric and historic site (CA-SDI-13227H/historic trash and lithic scatters, foundations and cistern), and three components of the Old Mission Dam and Flume (P-37-020910, CA-SDI-6658H and -6660H). A Native American consultant was present during the test excavations at CA-SDI-203. Based on the information above, these sites could be considered Tribal Cultural Resources as defined in the Public Resources Code. Therefore, as future projects are designed and submitted for review, any tribal or archaeological resources identified within the project boundaries will be evaluated using the four criteria of the California Register. Additionally, pursuant to the provisions of AB 52, tribal representatives will be involved in making recommendations regarding the significance of a tribal cultural resource, and potential eligibility for listing on the local or state registers during the required consultation process.

	B6-18	Comment noted. While the cultural report cannot be revised, the two suggested innovative survey techniques have been added to the Mitigation Framework (MM-Hist-1a, Step 1) and as such could be recommended for use on a case-by-case basis by the tribal representative during the project-specific AB 52 consultation process.
	B6-19	Comment noted. As described in Step 2 of Mitigation Framework MM-HIST1a, where a recorded archaeological site or tribal cultural resource is identified, consultation pursuant to AB 52 is required to discuss potential impacts and significance of impacts, and to provide recommendations for avoidance of the resource through project redesign or other methods mutually agreed to during the consultation process. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize direct impacts would be identified during the tribal consultation process.
THIS PAGE INTENTIONALLY LEFT BLANK	B6-20	The City recognizes that there have been past impacts to cultural resources within the Park. To address future impacts, the MPU provides Management Recommendations for the protection of cultural resources (see Response to Comment B6-2). Additionally, the PEIR provides an adequate mitigation framework including the requirement for conducting tribal consultation to ensure that individual resources are preserved and protected, and potential impacts are reduced to below a level of significance. Chapter 8.0 of the PEIR addresses potential cumulative effects of the project. Specifically, Section 8.2.6 discusses the potential for cumulatively significant effects on historic/cultural resources noting that regardless of the efforts to avoid impacts to these resources, the more pressure to develop land, the greater the potential for impacts.
	B6-21	Comment noted. The constraints analysis for cultural resources was conducted at a program level. In general, site specific, physical surveys and subsequent monitoring of cultural resources would occur as individual projects are implemented under the MPU or

		of cultural sensitivity within the Park and r to protect these areas from potential impa unauthorized trails after routine Park inspe with qualified City staff. A management re been added to the MPU as suggested in this
THIS PAGE INTENTIONALLY LEFT BLANK	B6-22	Pursuant to local, state, and federal law, the archaeological or tribal cultural resource information is protected in confidential resources reports. This information is retained and not released or disclosed to the public process. As a matter of regulatory of management recommendation of this nature to sites within the Park, rather than as a mean As such, a management recommendation the MPU as suggested. Also see Response to
	B6-23	Comment noted. Native American participal Step 1 and Step 2 of Mitigation Framewo such, no revisions to the Final PEIR are requ
	B6-24	Tribal consultation pursuant to AB 52 is Framework MM-HIST-1a. The purpose of A identify tribal cultural resources that couproject implementation, and to work colla early in the project review to assure that tribal adequately addressed during the CEQA discussion concerning the type of environm based on information provided during the described in Step 2 of MM-HIST 1a, the tribal a role in determining significance of tribal recommending appropriate mitigation to reimpacts. The consultation process in and appropriate treatment of tribal cultural resources.

B6-21 (cont.)

NRMP. However, Park Ranger staff are knowledgeable about areas make all feasible efforts pacts, including closure of oections and consultation recommendation has not nis comment.

- the location of recorded sites and associated site appendices to cultural cained by the lead agency ic during the CEQA review compliance, adding a ature may bring attention neans of protecting them. n has not been added to to Comment B6-21.
- pation is included in both vork MM-HIST-1a, and as guired.
 - described in Mitigation AB 52 consultation is to ould be impacted during llaboratively with the City tribal resources are being process. This includes nmental review necessary, consultation process. As al representative will have al cultural resources and reduce and/or minimize nd of itself ensures the esources early in the CEQA process, separate from the archaeological resources evaluation.

	(MLD) which could include a variety of culturally-appropriate treatments, including (but not limited to) repatriation, such as reburial in a location near to the find and not subject to future disturbance.	
B6-27	Cultural report, Religious or Sacred Uses, page 42-43, should more clearly reference that there are religious uses and sacred places within the Plan area including Cowles Mountain and natural water sources which hold the spirit of life and should be treated with the utmost reverence and respect as would any other religious item. Such areas, in particular, require meaningful consultation with tribes and careful management. Ms. Lucas prefers how the issue is worded in the DPEIR at page 5.6-12 than the approach of invasive questions to be asked as outlined in the Cultural report: Tribal people should not have to share all their secrets and spiritual information to influence resource management.	
B6-28	Finally, relative to paleontological resources, the DPEIR section on paleontology and mitigation must be updated to reflect the new guidance from the Society for Vertebrate Paleontology, updated both in 2010 and 2016. Please see:	
	http://vertpaleo.org/The-Society/Governance- Documents/SVP_Impact_Mitigation_Guidelines.aspx	
	http://vertpaleo.org/the-Society/Governance-Documents/Best-Practice-Guidelines-for-Repositing-and-Dissem.aspx	
	Are the DPEIR's analysis and mitigation measures consistent with this guidance?	
B6-29	Moreover, the DPEIR's proposed mitigation measures take no account of paleontological resources that may also be cultural (tribal) historic resources. Note page 11 of the Standards document (2010) clearly states that certain paleontological resources can be archaeological resources. This must be considered in all environmental documents. Please revise.	
B6-30	Ms. Lucas supports that the City is involved in discussions with a tribal entity regarding consultation procedures for future projects. However, given the significance of this area to multiple tribes and the quantity and quality of resources at issue, the City should continue to seek robust tribal input and participation. If tribes are not responding to the current frameworks for participation or outreach attempts (i.e., the DPEIR, page 5.6-2, notes that no responses were received for SB 18 consultation), other methods should be tried, included as noted above. Ms. Lucas also suggests direct outreach to tribal families with potential connections to the Park, such as the Brown, Christman and Salazar families be done.	
B6-31	The DPEIR's section on AB 52 at page 5.6-9 specifically references the changes made to CEQA Appendix G pursuant to AB 52. The new checklist framework separating TCRs and archaeology can be found, in its entirety, at: https://www.opr.ca.gov/docs/Appendix_G_AB_52_Update_2016.pdf and should be reflected in the DPEIR. Mitigation measures in the DPEIR also should be revised to better track those separate approaches to avoid confusion and application of incorrect evaluation and mitigation techniques to TCRs.	
	Thank you for the opportunity to comment. Should you like to discuss any of these comments,	

consultation with the tribe(s). This highlights why treatment of archaeological resources and

B6-25

B6-26

TCRs should be separated throughout the management and mitigation frameworks. Also, who

is the qualified staff at the Historical Resources Board to handle issues related to archaeology

would be treated according to the direction of the NAHC-designated Most Likely Descendant

and TCRs? Step 5 should more clearly reference that ancestral remains and grave goods

- Step 2 of the Mitigation Framework includes a procedure for B6-25 forwarding a final cultural resources report with a significance and eligibility determination (for archaeological sites or tribal cultural resources) to the City's Historical Resources Board (HRB) for designation. It should be noted that HRB staff do not make the CEQA significance determination related to archaeological resources; this is done in consultation with City environmental staff with technical expertise in the field of archaeology and/or cultural resources management, relying on the final cultural resources report and supporting documentation to ensure that adequate information is available to demonstrate eligibility for designation under the applicable criteria. This process is completed prior to distribution of a draft environmental document. Step 2 of the Mitigation Framework has been revised to more accurately reflect the process as noted above.
- B6-26 Step 5 of Mitigation Framework MM-HIST-1a would occur concurrent with tribal consultation. The measure states, "When tribal cultural resources are present, or non-burial-related artifacts associated with tribal cultural resources are suspected to be recovered, the treatment and disposition of such resources will be determined during the tribal consultation process." Furthermore, Step 5 also states that the disposition of human remains and burial related artifacts that cannot be avoided or are inadvertently discovered is governed by state (i.e., AB 2641 [Coto] and California Native American Graves and Repatriation Act [NAGPRA] of 2001 [Health and Safety Code 8010-8011]) and federal (i.e., federal NAGPRA [USC 3001-3013]) law. Culturally-appropriate treatment of such remains are determined in consultation with the Most Likely Descendant (MLD) designated by the Native American Heritage Commission (NAHC). The requirements of these laws are consistent with the information in the comment.

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B6-27 Although worded slightly differently, the threshold issue question for potential impacts to religious or sacred uses is treated the same in the Cultural Resources Report and PEIR. As stated in the impact analysis, the potential for religious or sacred places to be impacted during future activities associated with implementation of the Plans is high, particularly considering the Park has been previously identified as an area of concern to the local Native American community. This includes areas along waterways, where prehistoric archaeological and tribal cultural resources are most likely to be found. Early consultation at the project-level will assure that religious and sacred uses in the Park are being adequately addressed, protected, preserved and/or avoided based on confidential information shared by the tribal representative(s), at their discretion.

Comment noted. Section 15064.7 of the CEQA Guidelines B6-28 encourages public agencies to develop and publish thresholds of significance to provide guidance during the environmental review process. The Paleontology section of the City's Significance Determination Thresholds were last updated in 2011 to address specific changes to mapping nomenclature after adoption of the General Plan in 2008 and are adequate under CEQA. The Paleontological Guidelines were developed by City of San Diego staff with the assistance of Thomas A. Deméré, Director of the Department of Paleontology at the San Diego Natural History Museum. They are an informational document for applicants that contain an overview of the importance of the fossil record, the legal justification for paleontological mitigation requirements, and a basic discussion of the mitigation process. In conjunction with the City's Significance Determination Thresholds, the guidelines provide a step-by-step tool for City staff to use in determining project impacts and applicable mitigation measures and require qualified consultants to rely on the most current available data sources for evaluation of fossil resources. No changes to the City's thresholds or the PEIR section have been made in response to this comment.

	B6-29 Should a paleontological resource be determined to represent a cultural resource (either archaeological or tribal) during the consultation process, the subsequent project impact analysis and Mitigation Framework associated with cultural resources would apply and be implemented accordingly.
	B6-30 Comment noted. Public notice of the Draft PEIR was mailed to all tribal groups in San Diego County as well as individual members of the tribal community. In addition to the required consultation notifications under SB 18 and AB 52, only one comment letter was received during public review of the Draft PEIR from the Rincon Band of Luiseno Indians (See comment letter B9-1). As such, the requirements for notification in accordance with CEQA have been satisfied. Please note, however, that pursuant to SB 18, a notice of the San Diego City Council hearing will be mailed/emailed to all tribal groups identified by the NAHC for this project.
THIS PAGE INTENTIONALLY LEFT BLANK	B6-31 Comment noted. The Initial Study Checklist used by the City reflects the changes made to Appendix G in 2016 related to AB 52. For this program-level analysis, however, tribal cultural resources and archaeological resources are being addressed in one chapter of the Draft PEIR to provide a comprehensive overview of tribal cultural history in the Park, and the associated material culture manifested in the archaeological record. This approach was discussed with tribal representatives during the AB 52 consultation process concurrent with distribution of the Notice of Preparation for the Draft PEIR. The archaeological record provides baseline information to staff during planning and design of future projects and is made available for review during the tribal consultation process. The Final PEIR has not been revised in response to this comment.

please feel free to contact Ms. Lucas or myself.		
Thank you,		
Courtney Coyle Attorney for Carmen Lucas Kwaaymii Laguna		
Courtney Ann Coyle Attorney at Law Held-Palmer House 1609 Soledad Avenue La Jolla, CA 92037-3817		
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Letter B7



San Diego County Archaeological Society, Inc.

Environmental Review Committee

7 March 2017

To:

Ms. Myra Herrmann Planning Department City of San Diego

Suite 1200, East Tower, MS413

1010 Second Avenue San Diego, California 92101

Subject:

Draft Program Environmental Impact Report

Mission Trails Regional Park Master Plan Update, Natural Resources Management Plan, and Community Plan Technical Amendments

Project No. 349988

Dear Ms. Herrmann:

I have reviewed the cultural resources aspects of the subject DPEIR on behalf of this committee of the San Diego County Archaeological Society.

Based on the information contained in the DPEIR and its Appendix C, we have the B7-1 following comments at this time:

The cultural resources is well done and should serve as a good guide for future, individual projects.

As Appendix C notes, detailed mitigation is to be accomplished at to individual project level. We request being included in the resulting future environmental public reviews.

Thank you for providing this opportunity to participate in the public review of this DPEIR.

Sincerely,

Environmental Review Committee

RECON

SDCAS President

P.O. Box 81106 San Diego, CA 92138-1106 (858) 538-0935

B7-1 Comment noted.

Letter B8



P.O. Box 17411 San Diego, CA 92177 Web: www.AlliedClimbers.org

March 8, 2017

Myra Herrmann Senior Environmental Planner City of San Diego Development Services Department 1222 First Ave, MS 501 San Diego, CA 92101 Project No. 349988

Subject: MISSION TRAILS REGIONAL PARK (MTRP) MASTER PLAN UPDATE (MPU) AND NATURAL RESOURCES MANAGEMENT PLAN (NRMP)

Thank you for the opportunity to comment on the City of San Diego (City) Mission Trails Regional Park (MTRP) Master Plan Update.

Allied Climbers of San Diego

B8-1

The Allied Climbers of San Diego (ACSD) is a 501(c) (3) California Non-Profit Public Benefit Corporation supporting and representing climbers' interests in the many forms of recreational rock climbing—traditional climbing, crack climbing, sport climbing, and bouldering. ACSD promotes responsible use and sound management of climbing and outdoor recreational responsibility, self-regulation, conservation, and minimum impact practices. ACSD represents the collective interests of thousands of San Diego and Southern California climbers.

ACSD accomplishes its goals by working to educate interested parties involved in access issues that climbing resources are valuable recreational resources to the public and that climbing is a legitimate, low impact, human powered activity. ACSD advocates to federal, state, and municipal land managers concerning public lands usage; works closely with the Access Fund (a national climbing advocacy organization); works with federal, state, and municipal land managers and interest groups to plan and implement public land management actions and protocols; provides resources, funding, and volunteers for conservation and resource management projects; and develops and disseminates climber related information and education. For more information see: www.alliedclimbers.org and www.accessfund.org.

ACSD has been involved in the MTRP Master Planning process for years. Previous letters provided to the Mission Trails Task Force and City Staff are included and are attached below. ACSD thanks and acknowledges the City's efforts to involve the public and solicit comments from park users.

Mission Trails Regional Park is home to many valuable rock climbing resources. Rock climbing is currently very popular in the main Mission Gorge area and the area known at Santee Boulders off Mast Blvd. There are many other rock climbing resources within the park including the abandoned quarry within the SW boundary of the park (across the river from the BMX area), several boulders along the San Diego River, the southern and east sides of Kwaay Paay Mountain, the southeast side of South Fortuna Peak and the northwest side of Pyles Peak.

Master Plan Update (MPU) Comments

B8-1 Comment noted.

The Allied Climbers of San Diego understand the City of San Diego's responsibility to balance park user needs and the need to protect natural resources and appreciates the inclusion of rock climbing resources into the long-term vision of the park.

- Per Council Policy 700-17 "Park lands are an invaluable resource for citizens of the City of San Diego. It is important to protect these lands from being converted to nonrecreational uses." MTRP has been dedicated parkland per Charter Section 55 and as such. Mission Trails Regional Park must be managed as a recreational resource. Natural resource protection, which precludes recreation and public access, is not in conformance or compliance with the City Charter. Unnecessary closures of lands that are dedicated for park use unlawfully restrict public access. The question is whether or not the action or activity interferes with the free use and enjoyment of the park by the public. ACSD believes trail closures and access restrictions are contrary to the mandate of the City to manage MTRP as a public park for recreation.
- B8-3 We are concerned that natural resource protection and specifically the participation of external agencies (U.S. Fish and Wildlife Service, California Department of Fish and Wildlife, Marine Corps Air Station Miramar) have resulted in a plan that restricts recreation in dedicated parkland beyond what is necessary or mandated by regulation. ACSD would like to see a Master Park Plan that maximizes recreational opportunities in adherence to the park land dedication.

The Master Plan Update (MPU) includes area recommendations that include providing a number of rock climbing areas to be opened that have been closed since the late 1990's. ACSD supports the inclusion of Kwaay Paay, South Fortuna, Mission Gorge and Santee Boulders into the Park Plan. These are valuable resources to the community and we are happy to see them included in the vision of the park into the future!

B8-4 The MPU does not include access to other rock climbing resources in the park. Access to the quarry and boulders along the river are specifically prohibited in the plan. Since MTRP is dedicated park land ACSD is looking for justifiable regulatory mandated reasons why all rock climbing resources within the park cannot be available for the public.

The quarry is a very valuable rock climbing resource due to its aspect and steepness. There is very little rock climbing in San Diego County that receives afternoon shade, and steeper more difficult climbing is sought by many rock climbers. This climbing resource is immediately adjacent to an existing road, and no clear reason for its closure has been produced to the climbing community.

- Dr Figure 5-5 the rock climbing area shown as "proposed rock climbing" is the Santee Boulders. This popular rock climbing location is currently in use by rock climbers and the community and has a long history of rock climbing and public access dating back to at least the 1970's. All symbols that depict rock climbing at the Santee Boulders must be shown accurately which is that the area is an existing rock climbing area. Access cannot be restricted to areas historically used by the public, and in this case authorized by the property owner. Please revise all figures to show the Santee Boulders rock climbing area as an existing recreational resource.
- B8-6 The East Elliot map (Figure 5-5) is alarming in the sheer number of trails proposed for closure and limited number of existing or new trails to be retained. The elimination of public access through significant reduction and elimination of trails is unnecessary and unjustified. Trails and access to the East Elliot area should be retained. Trails within East Elliot that are proposed for closure for the sole reason of preventing

Comments B8-2 through B8-7 and B8-9 through B8-13 are focused specifically on the MPU and do not address the adequacy or accuracy of the PEIR. No response is required; however, the City offers the following responses:

- B8-2 The City does not agree that the project is not in compliance with the City Charter. While the MTRP is City parkland, it also contains extensive MHPA lands that are protected under the City's MSCP Subarea Plan. Trails and other compatible uses are allowed in the MHPA, and although closures would occur to protect sensitive biological resources, recreational use is not being precluded from the Park.
- B8-3 Comment noted. See Response to Comment B8-2. The Project does not restrict recreation within dedicated parkland; rather, it provides recreational opportunities in concert with natural resource management in order to meet the General Plan goals and associated community plan objectives related to recreation and natural resource conservation. Additionally, the NRMP and MPU have been developed as an integrated set of management guidelines for the park, with the NRMP focusing on the natural, cultural, and historical resources and the MPU focusing on public access and recreation. The actions associated with the NRMP are required, inter-related management actions intended to protect and enhance the natural resources within MTRP in compliance with the requirements of the MSCP program. Participation by other local, state and federal (trustee and responsible) agencies in a collaborative manner is integral to the planning process to ensure regulatory compliance while also recognizing the need to meet the project objectives by striking a balance between resource conservation and enhanced recreational amenities for Park users.

B8-4 See Response to Comments B8-2 and B8-3. Currently there is only one authorized rock climbing area within the Mission Gorge area of the Park (MPU Section 3.1.9). This is due to the presence of significant bat roosts that were identified in the original nesting

2

	bird and bat surveys conducted for the NRMP, which included the quarry site. As such, the NRMP provides justification for why the area was not included as a rock climbing area in the MPU. Management Recommendation 5.1.3 provides for ongoing meetings with interested recreational groups, including rock climbing, to discuss park plans.
	B8-5 See Response to Comment B8-4. This figure has not been modified as suggested in the comment.
	B8-6 Comment noted. The MPU provides recommendations pertaining to recreational trails. PEIR Figure 3-3 shows proposed trail buildout, illustrating closures, reroutes and new construction. The discussion of environmental effects is based on these recommendations and represents an adequate analysis of potentially significant impacts pursuant to CEQA.
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B8-7	trespass within MCA Miramar should remain open. Adaptive management should be implemented starting with visitor information boards, signage, fencing, public education and patrols. These measures should be implemented prior to an outright closure of valuable trails. Section 3.1.11 of the plan states that pre-1991 trails could be retained without any additional review or permitting. The MPU currently calls for a number of trails and roads that existed prior to 1991 be closed. Since retaining the trails and unimproved roads would not require additional environmental review or mitigation, why would these areas be closed to the public? Trails and roads in existence prior to 1991 should be retained unless an alternate route is designated that would provide the same public access opportunity.	B8-7	Comment noted. MPU Section 3.1.11 distinguishes between the trails created prior to the City's adoption of the Resource Protection Ordinance and the post-1991 unauthorized/unpermitted trails which require environmental review in accordance with CEQA and the City's Land Development Code, ESL Regulations. With respect to proposed trail closures, see Response to Comment B8-6.
B8-9 B8-10 B8-11 B8-12	The MPU identifies the presence of sensitive species at proposed rock climbing sites. ACSD is concerned that the simple presence of sensitive species will be used to justify closures into the future and that the climbing community will not realize the benefits in the plan due to the presence of bats or nesting raptors. We request that section 5.1.6 Habitat/Species Recommendation #42 be removed from the plan or modified to be inclusive of all activities in the park. The recommendation as written identifies remote monitoring of rock climbing areas and unduly focuses ranger and monitoring activities to one user group. Unauthorized activities throughout the park should be monitored by staff and taken into consideration for management actions. Rock climbers should not be the only targets of such monitoring. Figure 6-9 is missing the rock climbing symbol on South Fortuna and Pyles. Please add a rock climbing symbol to the map. Figures 5-5, 6-5 and 6-11 show the rock climbing area off Mast having a network of hiking trails. The depiction of the area having a trail system is misapplied to an area that should be managed more like the BMX area in the park. Bouldering is a type of rock climbing that requires foot access to the base of the boulders. Climbers climb up and down the boulders and need access to the base of the entire rock. Traditional trails, which focus traffic into network systems, would unduly restrict rock climbing at this location. The plan includes figures that outline closures Phasing? (figures 6-1 to 6-6). It is alarming to see a dedicated set of figures that outline closures and prioritization of closures within the park without a corresponding set of graphics that depict the phases of trail openings. There should be corresponding figures that show how trails will be created and developed in conjunction with proposed closures. Closing trails without the formation of alternate routes will undoubtedly result in non-compliance from the careated and developed in conjunction with proposed closures. Clos	B8-9 B8-10	Comment noted. The MPU balances the management needs of the Park's recreational use with the on-going sustainability of sensitive biological resources. Sensitive species are located throughout the park and the Habitat/Species Recommendations were developed to protect and preserve sensitive habitat that could support these species. Unauthorized trail closures and localized seasonal closures are two such recommendations (e.g., Habitat/ Species Recommendations 5.1.6 (6) and 5.1.6 (12)). With respect to Habitat/ Species Recommendations 5.1.6 (42), enforcement of unauthorized activity is necessary for the safety of Park users and the protection and management of sensitive biological resources and assures compliance with the City's MSCP Subarea Plan. No change to the MPU is required. Comment noted. Figure 6-9 in the PEIR has been modified in response to the comment. Comment noted. See Response to Comment B8-2. Figures 5-5, 6-5, and 6-11 show the locations and general extent of the proposed projects within East Elliott, including existing and proposed rock climbing areas. Once the site is publicly owned, the City will implement East Elliott Recreation Recommendations EE-R37 through EE-R39 to create a safe and accessible designated rock climbing area with input from stakeholder groups.

	B8-11 Comment noted. MPU Figures 6-7 through 6-12 depict each area of the Park as it would look after all of the recommendations of the MPU have been implemented. This would include all recommended trail buildout, reroutes and new construction. See Response to Comment B8-6. Implementation of the MPU, including trail closures and restoration efforts would be conducted using a phased approach, taking into consideration other management activities and MPU recommendations within the Park as further described in MPU Section 6.2.
THIS PAGE INTENTIONALLY LEFT BLANK	Section 6.2. B8-12 Comment noted. With or without adoption of the MPU and NRMP closures of unauthorized trails by City Park Staff are being implemented, where appropriate, to minimize adverse impacts to biological resources in accordance with the management directives in the City's MSCP Subarea Plan. B8-13 Comment noted. See Response to Comment B8-11.

B8-14

Thank you for recognizing ACSD as a community partner with the Park. ACSD and the climbing community have a long history in the park with partnering on volunteer events. We look forward to working with the City and the MTRP Foundation on future volunteer events and community partnering, for example the Climbers Loop Trail repair that we've spent multiple days repairing in the last few months.

B8-15 MTRP Draft PEIR Comments

The Draft PEIR fails to address impacts to the environment associated with an expansion or modification of recreational facilities. Since the MPU is a recreation based management plan and includes recreational features that would have a potentially significant impact to the environment, a CEQA recreation analysis must be included. The Draft PEIR in adequately addresses this issue.

- B8-16 The EIR should include a list of future discretionary actions associated with the Master Plan Update projects. The report only includes a list of approvals needed for the MPU at the Program level and not project level.
- B8-17 The EIR should include more detail on what MPU components are subject to subsequent environmental review. The park has already begun implementing actions identified in this plan. There should be a list of actions identified that do not require subsequent environmental review.
- B8-18 In closing, the climbing community has worked with MTRP for many years on joint projects. Our most recent event took place just this last November and was a great success, bringing volunteers and families together to give back to their community park. That same community stands ready to assist MTRP with both the funding and expertise necessary to make opening up previously closed areas more than just a possibility.

We look forward to working with the City and MTRP Foundation to implement Area Objectives that provide trails and access to rock climbing resources.

On behalf of the Members of the Allied Climbers of San Diego Representing Rock Climbers in San Diego County

Sincerely,

Josh Higgins 619 517 5508 joshdhiggins@gmail.com President, Allied Climbers of San Diego www.alliedclimbers.org An Access Fund Affiliate www.accessfund.org

Copy:

Jeff Harkness, City of San Diego Park and Recreation Scott Sherman, City of San Diego District 7 Council Representative Mark Kersey, City of San Diego District 5 Council Representative B8-14 Comment noted.

- B8-15 Direct impacts on the environment resulting from MPU and NRMP implementation, including recreation, are analyzed throughout the PEIR. Specifically, Section 5.12 of the PEIR analyzed MPU implementation and continued recreational uses, but not because of an increase in population, as would be the case under a community plan update where increased densities could require the need for new or expanded park facilities. Proposed programlevel impacts are adequately addressed in the PEIR, and no further evaluation is required.
- B8-16 Table 3-2 of the PEIR provides a list of possible future City discretionary actions that would be required to implement the Plans at the project level, including but not limited to, issuance of Site Development Permits and Right of Entry Permits. The introductory paragraph in Chapter 3 of the PEIR has been revised to provide clarification regarding actions associated with Project adoption and future subsequent project implementation "regulatory" actions, along with a minor edit to the title of both tables.
- B8-17 See Response to Comment B8-16. As discussed throughout the PEIR analysis, future projects implemented in accordance with the Plans would require subsequent environmental review. For example, project types that would result in ground disturbance in areas where sensitive biological, historical, archaeological, or tribal cultural resources are present, or are anticipated to occur, would be subject to review in accordance with the associated Mitigation Framework, which provides direction for subsequent project review and regulatory compliance requirements. Subsequent environmental review would assure that future projects are thoroughly evaluated and appropriate mitigation is identified that reduces impacts to below a level of significance in accordance with the Mitigation Framework.

B8-18 Comment noted.

	Attachments:		
B8-19	ACSD comment letter on July 1, 2008 ACSD comment letter on April 21, 2014	B8-19	The referenced attachments (letter to MTRP Task Force dated July 1, 2008 with attached figures and letter (e-mail) to MTRP Task Force dated April 21, 2014) provide comments to the MPU during the planning process. This comment is for reference only and does not require further response.



4878 Monroe Ave. San Diego, CA 92115-3245 Phone (619) 508-4665 Website: www.AlliedClimbers.org

Mission Trails Regional Park Task Force Members:

Councilmember Jim Madaffer, Councilmember Donna Frye, Supervisor Dianne Jacob, Supervisor Pam Slater, Santee Councilmember Brian Jones, La Mesa Councilmember Ruth Sterling, and CAC Chair Dorothy Leonard

July 1, 2008

Subject: Mission Trails Regional Park Master Plan Updates

Dear Task Force Members,

Thank you for this opportunity to comment on the Mission Trails Regional Park Master Development Plan updates. The Allied Climbers of San Diego (ACSD), a local climbers' advocacy organization, is concerned about the CAC's recent approval of language specifically limiting rock climbing within the park to one location only.

ACSD is a 501(c)3 non-profit supporting and representing local climbers' interests in all forms of rock climbing; traditional climbing, crack climbing, sport climbing, and bouldering. ACSD formed in mid-2007 to provide climbers a voice and to promote the responsible use and sound management of climbing resources by working in cooperation with climbers, other recreational users, public land managers and private land owners. We encourage an ethic of personal responsibility, self-regulation, strong conservation values and minimum impact practices among climbers. Currently, though ACSD formed a little over twelve months ago, we already have over 275 paying members, representing the interests of thousands of local climbers.

Working towards a future in which climbing and access to climbing resources are viewed as legitimate, valued, and positive uses of the land ACSD advocates to federal, state and local legislators concerning public lands regulations; works closely with the Access Fund (a climbers' national advocacy organization representing over 1.6 million climbers nationwide); works with federal and state land managers and other interest groups in planning and implementing public lands management and policy; provides funding for conservation and resource management projects; develops, produces and distributes climber education materials and programs.

To find out more about ACSD & the Access Fund please visit our websites: http://www.alliedclimbers.org/ http://www.accessfund.org/

The Allied Climbers of San Diego understand the Park's responsibility to balance Park user needs and the need to protect wildlife. But the Master Plan updates regarding climbing seek to create unnecessary and unjustified restrictions without verifiable scientific based data having been presented to the community to support a need for restrictions within Mission Trails Regional Park (MTRP). Furthermore, we believe that there has been insufficient public notification and involvement as part of this Master Plan Update process.

When the park was originally formed its mission was to be an "urban community park" that provided City residents the opportunity for various "recreational" activities (hiking, camping, climbing, bird watching, exploring, archery, biking, etc.). As outlined in the MTRP Master Plan "As a key resource of

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San Diego's regional park system, it can both effectively meet the recreational needs of current and future generations and directly compliment the urban environment that attracts so many people to the region." Unfortunately, it now appears there is a movement to turn more and more of the *public's community park* into a preserve without the public's knowledge and approval, and in the absence of a justified need supported by verifiable scientific based data.

Many activities and development ideas outlined in the 1985 Master Plan have now been stricken by the plan updates. The Park belongs to the community and as such, we strongly feel it should be managed to accommodate the needs of the community. Maintaining existing closure restrictions and adding additional restrictions on the use of the Public's Park is an unbalanced approach to managing an urban community park. The Park is meant mainly for people to experience and enjoy the outdoors, and should not become a closed wildlife preserve.

Updates to Section VII Mission Gorge, page 11, state that the River Gorge sub-area is the "only area within the park where rock climbing is permitted." Additionally, on page 19, rock climbing has been further limited to the Western portion of Kwaay Paay. This language unnecessarily excludes all other rock climbing opportunities within the Park. Limiting climbing in this way further reduces the balance of climbing resources available for climbers compared to those resources made available for other more intensive uses that take place throughout the park, such as mountain biking trails for mountain bikers.

Well established existing pedestrian paths, dirt roads, and climbing areas are currently closed to the public supposedly to protect riparian habitat. After close review by professional environmental planners it is now apparent that some of these closed areas are well outside the riparian zone and not in conflict with responsible recreation use. Yet these areas were closed without any verifiable scientific based data having been provided to the public to justify their closure.

Though, unnecessarily and without said data, it has been the policy of the park since 1999 to limit climbing to the main cliff along the climbers loop trail, it was never written into the park management plan. The head ranger had said in 1999 that the various closures could be reconsidered in the future, but now that will not be possible once the closures are made permanent in the Master Plan. Figure 1 shows the location of all the climbing resources in the Park. Figure 9 shows how limited climbing is compared to the many miles of trails used for other recreation. MTRP contains the only climbing crags in the city.

Climbing areas within the Park closed in 1999 without written or scientific justification include:

- 1. The abandoned quarry within the SW boundary of the park (across the river from the BMX area), Figures 2-4
- 2. Several boulders along the San Diego River, Figures 5 & 6
- 3. The southern and east sides of Kwaay Paay Mountain, (north of Mission Gorge Rd)
- 4. The southeast side of South Fortuna Peak (NW of Father Junipero Serra Rd) Figure 7
- 5. The northwest side of Pyles Peak (south of Mission Gorge Rd.) Figure 8

The quarry in particular is a valuable climbing resource, providing unique and challenging climbs not duplicated anywhere else in the park. These climbs are from 35 to 70 feet long, the rock being more vertical, continuous, and with more holds and texture than the polished rock at the main cliff. It faces SE whereas the main cliff faces west, so they are shady at different times of the day, providing a climbing opportunity when the main cliff is un-climbable. The quarry is located only about 20 yards north from a maintained dirt road in the park so it requires no new trails. The dirt road is lined with existing park installed fencing, allowing for effective management of the river habitat to the east (much like all other areas of the park where the San Diego River flows). The river riparian zone is located on the SE side of dirt road, so it is easily kept separate from the quarry. Since it is an abandoned quarry, the ground is already disturbed. The quarry forms a manmade alcove cut into the hillside, so it is not part of the main wildlife corridor along the river.

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At the MTRP CAC meeting in January, when ACSD presented its original comments, it was explained that the old 1985 Master Plan stated on Page 5:

"To minimize visitor impact, rock climbing should be restricted to the eastern side of Mission Gorge." It is not clear what the planners intended by that in 1985. They may not have even been aware of the climbing potential of areas like the old quarry; again, an already "disturbed" area – from blasting operations. In fact, in general the park management was not fully knowledgeable about climbing until the 1998 San Diego climbing guidebook came out, until then preferring to treat climbing as an unofficial activity.

It seems likely that the 1985 Plan may have only been differentiating between the two cliff-bands on each side of the central gorge, closing the one on the SE side of South Fortuna Peak, and leaving the main cliff open on the west side of Kwaay Paay Peak. That interpretation means they did not say anything one way or the other about the south or east sides of Kwaay Paay Peak, the west side of Pyles Peak, or the bouldering all along the river, or the quarry.

There is another small quarry on the eastern side of the gorge, about 100 yards SW of the river crossing below the visitors center, which would have remained open for climbing according to the 1985 plan, along with all of Kwaay Paay and Pyles Peaks. So the 1985 planners seem to have not been planning to close access to the quarry(s). In fact, at the time, a hiking trail in the riparian zone was still being planned.

Regardless of what was intended by the 1985 Master Plan, the point of the new 2008 Master Plan is to improve upon the old plan. It does not mean the new plan must become even more restrictive. In cases where the impact is minimal, it will make a better *Urban Community Park* if unnecessary restrictions can be removed. Any area of the Park which is closed to the public needs a full justification, supported by verifiable scientific based data – not speculative conjecture, supported by subjectivism only.

The park made an arbitrary decision to close 95% of the old use trails along the San Diego River, keeping open only the Padre Dam area, the grinding stones, and the river crossing below the visitor's center. Opening the quarry (an already developed climbing resource) would have no effect on the riparian habitat. It would cause very minimal impact to the riparian habitat to reopen the two boulders, affecting only another 5% of the river area. Reference Figures 5 & 6.

It is likely that there are unstated reasons for the 1999 climbing restrictions, possibly due to liability fears. Such fears are unfounded since all rock climbing is done 100% at the risk of the user. The California Recreation Use statute (Civil Code 846) provides that there is no liability to owners, especially public land managers, due to recreational use. The park and city have no legal liability. Climbing at the quarry and other crags is no more hazardous than climbing at the main cliff along the climbers loop trail, which remains open.

Rock climbing is a passive, human powered, low-intensity, environmentally clean recreation activity that has not been justifiably linked to negative effects on sensitive resources or native habitat found specifically in these areas. Rock climbing is enjoyed by many San Diegans and their families within MTRP as a way to experience the outdoors, hands-on! Limiting community use in this way only serves to further distance families from "their environment", not re-connect them and their children with their natural world.

As previously noted, absent verifiable scientific based data being formally presented to justify restrictions on rock climbing within MTRP, we request that the Master Plan be reworded so as not to specifically preclude climbing at locations within the park. Further, absent said data that the old "quarry climbing area" be reopened and officially recognized as a rock climbing area within the Park for all to

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enjoy. The road to the climbing quarry could remain a low use dead end, since it is not planned to be part of the San Diego River Trail.

The climbing community has worked with MTRP for many years on joint projects. Our most recent event took place just this last January and was a great success, bringing volunteers and families together to give back to their community park. That same community stands ready to assist MTRP with both the funding and expertise necessary to make opening up previously closed areas more than just a possibility.

ACSD and the rock climbing community disagree with the MTRP CAC updates for the Mission Gorge section IIV. Please vote to remove restrictions on climbing from the Master Plan. (See p VII-4 and VII-7 of the Plan). Respectfully, our specific requests are the following:

- Strike out the sentence "This is the only area in the Park where rock climbing is permitted" within section VII page 4.
- Strike out the sentence "Rock climbing should be restricted to the designated area on the west facing side of Kwaay Paay" within section VII page 7.
- 3. Modify the sentence in section VII page 3 "Other informal activities include hiking, nature study, rock climbing and mountain biking," to include uses originally outlined in the 1985 Master plan which include "exploring and playing." Revised sentence to read "Other informal activities include hiking, playing, nature study, exploring, rock climbing, and mountain biking."

This last request may seem innocuous, but its implications are significant. Playing and exploring are fundamental to the human spirit and must be fostered within our communities and especially within our children's minds. Rock climbing is a family activity, it is a playful activity, and it is a rewarding activity. It is an environmentally friendly activity that allows humans to engage in their natural world, hands-on! And it is this hands-on element that is increasingly found missing in children's activities when visiting nature. As Richard Louv suggests, strongly recommends, in his best seller, Last Child In The Woods, Saving Our Children From Nature Deficit Disorder, hands-on play when engaging nature is what society needs—it is what adults and children alike are missing, its increasing absence due to un-based fears of damaging our natural world is fundamentally responsible for many of society's current ills.

If communities continue to miss out on this important aspect of experiencing nature, nature will eventually miss out. For we can not ensure future generations will responsibly enjoy recreation on our public lands if we continue to close them off to people. We surely cannot continue to foster citizens who love and wish to protect nature unless we continue to protect responsible public access rights to the public's lands. ACSD feels it is vitally important to protect our natural world at large, and the integrity of nature within MTRP, while at the same time being vitally important to maintain access to rock climbing that is not having a negative effect on this natural world, or the state of nature within MTRP.

Therefore, we respectfully request that the Task Force follow our recommendations, ensuring access to climbing by the responsible climbing community for their continued use and enjoyment.

On behalf of the Members of the Allied Climbers of San Diego Representing Rock Climbers in San Diego County

Sincerely.

Jeff Brown Executive Director Allied Climbers of San Diego, Inc. www.alliedclimbers.org

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Figure 1. Overview of All Climbing areas in MTRP. Only the Main Cliff along the climbers loop trail is open.



Figure 2. View looking south past Climbing Quarry

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Figure 3. View of old Quarry with Climbing Routes, showing afternoon shade on sheer face. Quarry is recessed in an alcove blasted into the hillside, away from the riparian wildlife corridor along the river. Visible is an existing access road, fenced to prohibit access from the access road into the riparian area.



Figure 4. Climbing Quarry viewed from across the river, showing disturbed area. Climbing routes all face left and are barely visible. Superior mine is at upper left and BMX area is at lower left.

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Figure 5. View of Boulder near river across from climbers loop trailhead



Figure 6. View of Boulder just 40 feet from road, ¼ mile upstream from climbers loop trailhead

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Figure 7. Southeast Face of South Fortuna Peak.

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Figure 8. Aerial view of northwest side of Pyles Pk

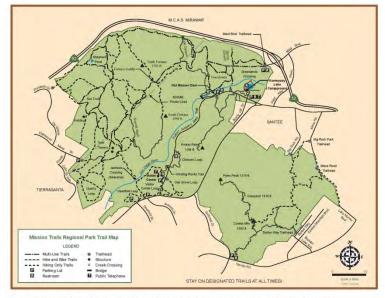


Figure 9. Map of Park Trails, showing the one climbing trail, vs. many trails for other uses.

ACSD - San Diego's Climbing Future

Date: April 21, 2014

Subject: Mission Trails Regional Park Master Plan Update

The Allied Climbers of San Diego (ACSD) would like to thank you once again for providing the opportunity to provide comment into the process of updating the Mission Trails Regional Park Master Plan.

ACSD is a 501(c)3 non-profit supporting and representing local climbers' interests in all forms of rock climbing: traditional climbing, crack climbing, sport climbing, and bouldering. ACSD formed in mid-2007 to provide climbers a voice and to promote the responsible use and sound management of climbing resources by working in cooperation with climbers, other recreational users, public land managers and private land owners. We encourage an ethic of personal responsibility, self-regulation, strong conservation values and minimum impact practices among climbers. We have hundreds of members and represent the interest of thousands in the rock climbing community.

When the original MTRP Master Plan Update process began in 2008, representatives from the Allied Climbers of San Diego (ACSD) met with the MTRP CAC, and later the MTRP Task Force over wording in the original draft that would have permanently limit rock climbing in the park to the "Main Wall" area. Since then, the overly restrictive wording has been removed and public workshops have gathered comments and user group interests which have been incorporated into the plan.

As an access organization representing the interests of thousands of San Diego climbers, I want to thank you for the efforts you've put forth to gather public input and incorporate that into the Master Plan. A tremendous amount of progress has been made from the original draft toward balancing the interests of user groups with resource preservation in Mission Trails Regional Park. But in reviewing the latest draft Master Plan Update (MPU) document and Natural Resources Management Plan (NRMP), it is clear that there is still some progress to be made before we reach a final solution.

First, ACSD would like to recognize the positive improvements we are happy to see in the latest MPU document.

- ACSD is recognized as a funding source to MTRP in the MPU (Section 6.1.5.3).
 Our connections to other national rock climbing access groups open up opportunities to grants and funding toward climbing access projects, and our numbers make us a valuable asset as a source of labor for projects such as trail maintenance, restoration, or construction. We look forward to partnering with MTRP to implement actions proposed in the MPU.
- 2. Additional "proposed" climbing resources have been identified within the park based on workshop input.
 - a. Pyles Peak proposed climbing area, access trail, and staging area:
 We support the evaluation of a new Pyles Peak trail and rock climbing access to the West face of Pyles Peak, and the corresponding staging area identified in (Section 5.3.5, CM-R-12, CM-R13, and Section 5.3.3, CM-F2).
 - b. East Face of South Fortuna proposed climbing area and new access trail: We support providing rock climbing access to the East face of South Fortuna by constructing a new hiking loop trail. We also support new trail FM-R7 as a related project, as it would simplify access to the area and improve the quality of the approach (Section 5.4.5, FM-R9 and FM-R7).
 - c. East Elliott climbing area, the Santee Boulders: We are happy to see this area recognized as a climbing resource in the MPU and access trails identified, as well as the proposed Castlerock entrance area (Section 5.6.3, EE-F1 and Figure 5-5). While this is an improvement over previous drafts to the MPU, some changes to this section are still necessary and will be detailed below.

- The MPU specifically recognizes the importance of providing alternatives when access to recreational resources
 is restricted, stating: "if permanent closure is required, then an alternate location or route for the recreational
 use should be identified and implemented." (Page 5-2, par. 2)
- Beyond the specific examples emphasized above, in general, ACSD is happy to see the proposed growth recreational opportunities within the park.

While the items listed above are all positive aspects of the MPU document, ACSD still believes some improvements are necessary prior to final approval.

When the MPU process began in 2008, ACSD met with the CAC and MTRP Task Force over arbitrary closures of climbing areas within the park in 1999. Our demands were simple—the closure of any climbing resource of interest within MTRP must be based on an unbiased scientific evaluation in accordance with the CEQA.

ACSD firmly believes that rock climbing approved recreational activity with access supported by the park. During the public input process, ACSD identified a number of potential climbing areas within the boundaries of the current MTRP, and its proposed future boundaries. Two of the areas we identified as the most important and valuable climbing resources are the Santee Boulders and the Southwest Boundary Quarry.

For the Southwest Boundary Quarry, downstream of the San Diego River Crossing Trail, we would simply like a proper assessment of the resource to be completed, including consideration of the exact location of the climbing resource relative to the bat species and their roost location at the site. It is important to recognize that the only quarry (out of six within the park) that is of interest to climbers already has an access route via a maintained access road from the Deerfield staging area. Climbers that visited the area in the past have stated that they believe the bat roosts are away from the established climbing routes. With that background, the ACSD believes that the South Boundary Quarry should be considered a "Proposed" climbing area in the MPU document. A proper scientific evaluation should be completed before the site is deemed not to be a suitable climbing resource.

Of greater concern is the MPU's evaluation of the Santee Boulders. The Santee Boulders have been valued by San Diego climbers as one of the most popular climbing destinations in San Diego County for over 50 years. On October 29th, 1973, what was likely San Diego's first climbing competition – the "Great Western Bouldering Championship" – was held at the Santee Boulders. In 1978, the first guide to the area was published. In 1986 the area was featured in "Rock and Ice" Magazine. Since then, additional climbing guides have been published. Today, the area sees thousands of climber-days each year by local climbers and visitors to San Diego wishing to hone their skills on the technical rock faces. The Santee Boulders is the most visited climbing area in San Diego County.

Past and current landowners have been well aware of the recreational use of the area and have chosen not to deny access to the public. In fact in recent years, numerous trash clean-ups and graffiti removal events have been organized by the climbing community with the approval of the landowners. In 2013, the City of Santee recognized members of the climbing community at a city council meeting for the work done to organize nearly 100 volunteers in an all-day event to scrub paint from the rocks with a biodegradable graffiti remover.

With all of that considered, should the Santee Boulders not be considered in the Master Plan to be an "Existing" climbing area rather than a "Proposed" climbing area? While the access trails surely are in need of improvement and rerouting, the same consideration applies to the trails and access roads in the area – they should not be considered "Unauthorized."

With that considered, ACSD respectfully requests the following changes be made prior to approval of the MPU:

- 1. Page 3-63, par. 3 states: "The Climbers Loop Trail provides access to the only authorized rock climbing area in the park, and the western face of Kwaay Paay Peak, which is utilized extensively by local climbing enthusiasts of all skill levels." Because rock climbing access to other areas within the park is likely in the future, this should be updated to: "The Climbers Loop Trail provides access to the western face of Kwaay Paay Peak which is utilized extensively by local climbing enthusiasts of all skill levels."
- The Southwest Boundary Quarry area should be evaluated as a proposed climbing area. To accomplish that, ACSD requests the following changes to the MPU document:
 - a. Section 5.5, Pg 5-33, paragraph 3 states that "old quarry cliff cased along the San Diego River... will remain closed to protect nesting habitat for the least Bell's vireo. These areas are also identified as potential nesting habitat for the southwestern willow flycatcher, and are significant roosting sites for the state sensitive pocketed free-tailed bat. "This paragraph should be revised to either remove the specific exclusions for rock climbing. It may include reference to the South Boundary Quarry as a "Proposed" climbing area.
 - b. Add one additional "Recreation Recommendation" to Section 5.5.5, stating: "Evaluate the southern-most Southwest Boundary quarry cliff face downstream from the San Diego River Crossing Trail as a proposed climbing resource. Consider actual location of climbing routes relative to bat roosts to evaluate potential impact. Users would access the area via the existing maintained service road."
 - c. Section 5.5.4, FM-H2 states: "Install and maintain 'Sensitive Habitat Keep Out' signage along the trails nearest the Southwest Boundary Quarry and the Jackson Drive Quarry to protect the significant bat roosts that exist in these locations and issue warnings or citations to all violators." This wording conflicts with recognizing the Southwest Boundary Quarry as a "proposed" climbing area and should be modified to state "Install and maintain 'Sensitive Habitat Keep Out' signage along the trails nearest any significant bat roost sites closed to public access and issue warnings or citations to all violators."
 - d. Update Figure 5-4 to identify the southern Southwest Boundary Quarry as a "Proposed" climbing area with the "Proposed" rock climbing area icon
- 3. In the East Elliott section, the Santee Boulders should be recognized as an "Exisiting" rock climbing area and trails in the area not considered "unauthorized":
 - a. Section 5.6.5, "Recreation Recommendation" EE-R31 states: "Assess the unauthorized user-created trails in and around the Santee Boulders for sustainability and redundancy." The trails and roads in this area are on private land where access to hiking and climbing is not restricted by the landowner. These trails are not "unauthorized." While the trail system there surely could be improved, ACSD requests that this section be reworded to remove the term "unauthorized" so it states: "Assess the existing user-created trails in and around the Santee Boulders for sustainability and redundancy."
 - b. Figure 5-5 currently identifies the Santee Boulders as a "Proposed" climbing resource. The area is an "Existing" climbing resource, currently accessed legally, with over a half-century history of climbing use. The Santee Boulders should be identified on Figure 5-5 with the icon for an "Existing" climbing area.

With these additional changes to the MTRP MPU document, ACSD believes the MPU document appropriately represents the interests of the climbing community and will support the document's approval.

Once again, ACSD would like to thank the MTRP CAC and Task Force for your efforts to involve park users as an integral part of the Master Plan Update process.

Letter B9

RINCON BAND OF LUISEÑO INDIANS

Cultural Resources Department

1 W. Tribal Road Valley Center, California 92082 (760) 297-2330 Fax:(760) 297-2339



January 27, 2017

Myra Herrmann The City of San Diego Planning Department 1010 Second Avenue, MS 413 San Diego, CA 92101

Re: Mission Trails Regional Park Master Plan Update/Natural Resources Management Plan/ Community Plan Technical Amendments Project No. 349988

Dear Ms. Herrmann:

This letter is written on behalf of the Rincon Band of Luiseño Indians. Thank you for inviting us to submit comments on the Mission Trail Regional Park Master Plan Update/Natural Resources Management Plan/Community Plan Technical Amendments Project No. 349988. Rincon is submitting these comments concerning your projects potential impact on Luiseño cultural resources.

B9-1

The Rincon Band has concerns for the impacts to historic and cultural resources and the finding of items of significant cultural value that could be disturbed or destroyed and are considered culturally significant to the Luiseño people. This is to inform you, your identified location is not within the Luiseño Aboriginal Territory. We recommend that you locate a tribe within the project area to receive direction on how to handle any inadvertent findings according to their customs and traditions.

If you would like information on tribes within your project area, please contact the Native American Fleritage Commission and they will assist with a referral.

Thank you for the opportunity to protect and preserve our cultural assets.

Sincerely,

Vincent Whipple

Rincon Cultural Resources Department

B9-1 Comment noted. See Response to Comment B6-15.

Bo Mazzetti Tribal Chairman Tishmall Turner Vice Chairwoman Steve Stallings Council Member Laurie E. Gonzalez Council Member Alfonso Kolb Council Member

Letter B10



Save Our Heritage Organisation Saving San Diego's Past for the Future

Thursday, February 23, 2017

Myra Herrmann, Environmental Planner City of San Diego Planning Department 1010 Second Avenue, MS 418 San Diego, CA 92101

Re: Mission Trails Regional Park Master Plan Update/Natural Resources (No. 349988)

Ms. Herrmann,

Save Our Heritage Organisation (SOHO) understands there are 173 historical and tribal cultural resources within the study area for the Mission Trails Regional Park Master Plan Update/Natural Resources (project No. 349988). We also understand this number includes five cultural resources already determined significant and 105 cultural resources without any determination.

B10-1

Although the Plans do not propose development at this time, and aim to manage important resources while still enabling recreational opportunity, SOHO asserts that a historical determination of significance should be prepared for the remaining 105 known cultural resources to help inform future projects. These evaluations will best equip the city and other involved stakeholders to balance regional recreational needs with the necessary protections for historical and tribal cultural resources.

Thank you for the opportunity to comment,

Bruce Coons Executive Director

Save Our Heritage Organisation

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Bruce Coons, Executive Director

2476 San Diego Avenue • San Diego CA 92110 • www.sohosandiego.org • 619/297-9327 • 619/291-3576 fax

B10-1 Comment noted. See Responses to Comments B6-16 and B6-17.

Letter C1

Andrew Asaro 2230 India St. San Diego CA, 92101 619-234-0780

March 8, 2017

Myra Herrmann, Environmental Planner City of San Diego Planning department 1010 Second Ave. MS 413, San Diego, CA 92131 PlanningCEQA@sandiego.gov

Subject: Project number 349988; Mission Trails Regional Park Master Plan Update

Ms. Herrmann,

C1-1 Lhave reviewed the referenced document and provide my comments below in accordance with the outlined instructions indicated on the January 20, 2017 public notice I received.

I am a private land owner in East Elliott and have owned my property since the original land sale by the government. As you are aware, East Elliott is within the City of San Diego's MSCP boundary and as such as been designated as preservation subject to the allowances provided for in the MSCP. The City's MSCP program was established without a funding mechanism to compensate property owners who were within the new designation and the City's current acquisition of mitigation property has largely been on the western boundary of the East Elliott area and this new proposed amendment indicates to means of additional funding to compensate land owners or fund the many objectives indicated in the proposed plan.

Therefore my comments on the draft document are as follows:

- C1-2
- Figure 3-3: The line colored to indicate "Proposed Trails at Buildout Collocated on Access Roads" depicts a proposed trail through the parcel I own. Programing a trail or other infrastructure into private property without a funding component to facilitate acquisition is erroneous.
- C1-3
- 2. Page 3-6; indicates that :"Private property owners will continue to have development rights subject to the community plan, however, the City is actively pursuing the acquisition of land in the area" I could find no such acquisition strategy in this document. Therefore I would request that the Goals of this proposed plan should be amended to include a provision that protects the current development rights of the existing properties. This could be incorporated in 3.2.2.1 (b), Planning recommendations.

C1-1 Comment noted.

- C1-2 The MPU does not propose public acquisition of private lands without compensation. Draft PEIR Section 3.2.2.1(d) pertains to possible funding sources associated with the recommendations of the MPU. Whether acquisition of private property would be required or included in individual project implementation would be determined on a project-by-project basis.
- C1-3 The MPU does not propose public acquisition of private lands without compensation. See Response to Comment C1-2.

C1-	4	3,	3.2.2.1 (d) Park Wide Policies, Funding; This area lack any degree of specificity and at the very least should include a provision to identify resources to continue the acquisition of property and easements such that the goals and objectives of the proposed plan can be achieved.	C1-4	The MPU does not propose public acquisition of private lands without compensation. Whether acquisition of private property would be required or included in individual project implementation
C1-	5	4.	3.3.1 Prioritization: Project Implementation: Of the three priorities listed in this section none outline the acquisition of land or easements to accommodate the new trails systems that are depicted across private land. Therefore, to accomplish the goals and objectives of the proposed plan I would request that two new priorities be added. i. The plan outline a strategy to acquire the land necessary to implement the trail system as outlined in the proposed plan and ii. A priority be created to identity all cost and revenue sources associated with the implementation of the plan.	C1-5	would be determined on a project-by-project basis. The MPU Planning Recommendation EE-P2 provides direction for the acquisition of private land whether through willing sellers or development agreements. No change to the Final PEIR is required.
			ciate the opportunity to comment on the proposed plan and look forward to reviewing the draft.		
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	Letter C2		
	February 21, 2017		
	To: Myra Herrman, Senior Planner City of San Diego From: Dave Dilday East Elliott Property Owner Parcel # RE: City of San Diego Draft Program EIR Mission Trails Park #349988		
C2-1	This is in regard to the above mentioned Program EIR for the Mission Trails Regional Park. My interest in the implementation of the EIR is primarily focused on the East Elliot area and the private property located adjacent to Pardee's Castlerock project at the norther terminus.	C2-1	Comment noted.
	My family has owned property in the East Elliott area since 1965. My Grandfather, Pascal Dilday purchased property at the Government auction with the intent of developing the property in the future.		
	In 1997 the City adopted the MSCP, which effectively limited development to the least sensitive 25% of the property owner's lot. This conservation mechanism had the effect of limiting development rights of the private property owners in the East Elliott area. In any event, with the development of the new Castlerock project, we are finally in a position to develop our property in accordance with the MHPA guidelines.		
C2-2	Our concern moving forward with our development is that one of your proposed trails (R-30) traverses our private property and is noted in your legend as a "multi-use" trail. Our preliminary layout of our project, which is limited to the least sensitive 25% of the property shows the trail at the top (west) of our project site. (see attached site plan)	C2-2	Comment noted.
	We do not mind cooperating with the City to move this trail to the space that will ultimately dedicated to open space and it appears the trail only barely touch's our development envelope. In any event, once we submit, we will be happy to work with the City to insure that the multiuse trail can remain in close proximity to the existing location.		
C2-3	We do want to point out that this trail currently is being used by bikers, hikers etc without our permission and our efforts to restrict access by posting "no trespass" and "private property" signs have been ignored by the public and taken down or destroyed in most cases of the last 50 years. We would like to make sure that we are indemnified in the event of any accident or event that may happen on our property since our efforts to enforce our rights as private property owners have been mostly ignored.	C2-3	Property owners have the right to defend their property from trespass. The current trail is not a public facility. As such, the City cannot indemnify the property owner in the event of any accident that occurs on this private property.
C2-4	In any event, we would be happy to cooperate with the City in realigning the (R-30) trail as part of our development plan and we will wait for feedback from the City with regard to this trail once we submit our project to the City.	C2-4	Comment noted.

5.0 Environmental Analysis

5.1 Land Use

C2-5

MSCP implementation requirements are also included in this section of the Subarea Plan. Those actions identified as Priority 1 are required to be implemented by the City as a condition of the MSCP Take Authorization to ensure that covered species are adequately protected. The actions identified as Priority 2 may be undertaken by the City as resources permit. In addition to implementation of the management priorities for the Eastern Area, the goals and polices, which have been incorporated into the Plans, are intended to achieve, maintain, and enhance biological diversity within the City's MHPA and ensure continued conservation of viable populations of endangered, threatened, and key sensitive specifies and their habitats in the Park.

a. Multi-Habitat Planning Area

The MSCP's MHPA includes regional wildlife corridors and core biological areas that are targeted for conservation. These lands have been determined to provide the necessary habitat quality, quantity, and connectivity to sustain the unique biodiversity of the San Diego region, and sensitive biological resources under the City's ESL Regulations. Conditionally compatible uses within the MHPA include passive recreation, utility lines and roads, limited water facilities and essential public facilities, limited low-density residential use, brush management zone 2, and limited agriculture (MSCP Subarea Plan Section 1.4.1). The majority of lands at MTRP are located within the MHPA (NRMP Figure 3-1).

Figure 3

350

Private land wholly within the MHPA is allowed only up to 25 percent development in the least sensitive area per the City's MSCP Subarea Plan. Should more than 25 percent development be desired, an MHPA boundary line adjustment may be proposed. The City's MSCP Subarea Plan states that adjustments to the MHPA boundary line are permitted without the need to amend the City's Subarea Plan, provided the boundary adjustment results in an area of equivalent or higher biological value. To meet this standard, the area proposed for addition to the MHPA must meet the six functional equivalency criteria set forth in Section 5.5.2 of the Final MSCP Plan. All MHPA boundary line adjustments require approval by the Wildlife Agencies and the City.

For parcels located outside the MHPA, there is no limit on the encroachment into sensitive biological resources, with the exception of wetlands, and listed non-covered species' habitat (which are regulated by state and federal agencies) and narrow endemic species. However, impacts to sensitive biological resources must be assessed and mitigation, where necessary, must be provided in conformance with the City's Biological Guidelines.

The boundary of the MHPA within a specific parcel may be revised through an MHPA Boundary Line Adjustment to accommodate additional development and requires approval from the City, CDFW, and USFWS. An analysis for an adjustment of the MHPA boundary would be required to evaluate and compare the relative biological value of the areas proposed for removal from the MHPA with those proposed for inclusion into the MHPA (lands within the MHPA would be replaced at a 1:1 ratio). This evaluation requires assessing the potential effects on various parameters related to the function of the MHPA preserve system.

 Effects on significantly and sufficiently covered habitats (i.e., the exchange maintains or improves the conservation, configuration, or status of significantly or sufficiently conserved habitats).

> Mission Trails Regional Park Master Plan Update PEIR Page 5.1-7

C2-5 The attachment is an excerpt from the Draft PEIR in reference to the MHPA. This comment is for reference only and does not suggest an inadequacy in the analysis of the Draft PEIR.

LETTER

RESPONSE

C2-6

C2-6 The attachment includes a tentative site plan of the subject property. This comment is for reference only and does not suggest an inadequacy in the analysis of the Draft PEIR.

Dave Dilday February 28, 2014 Page 2

C2-7

The subject property consists of two undeveloped parcels of residentially zoned land totaling 29.00 acres. The property is zoned RS-1-8, in the City of San Diego, which allows 40,000 SF lot minimum lots. However, the city will allow lot clustering due to slope, and the owners estimate that the subject can achieve 31 single family residential lots averaging 7,500 SF, if mapped.

Based on the valuation analysis in the accompanying report, and subject to the definitions, assumptions, and limiting conditions expressed in the report, our opinion of value is as follows:

Value Conclusions			
Appraisal Premise	Interest Appraised	Date of Value	Value Conclusion
Market Value As Un-Entitled Land	Fee Simple	February 19, 2014	\$2,600,000
Market Value As Entitled Land	Fee Simple	February 19, 2014	\$3,410,000

Note: The 'entitled' land value is not estimated at a 'prospective' date of value, as the specific timing for the subject entitlements was not estimated, but rather assumes the hypothetical condition that the subject site is entitled as of the current date of this appraisal.

Extraordinary Assumptions and Hypothetical Conditions

The value conclusions are subject to the following extraordinary assumptions that may affect the assignment results. An extraordinary assumption is uncertain information accepted as fact. If the assumption is found to be false as of the effective date of the appraisal, we reserve the right to modify our value conclusions.

- 1. The subject parcels currently have limited, unpaved access. The subject land is located directly adjacent to, and north of an approved, 430-lot single family residential subdivision to be known as Castlerock, owned by Pardee Homes. Pardee Homes plans to begin site development of the Castlerock development within the next six months. The value of the subject land is enhanced due to the fact that Pardee Homes plans to install infrastructure (streets, grading, utilities, etc.) up to the border of the subject land. The completion of Pardee Homes' infrastructure will provide access to the subject land from Mast Boulevard and significantly enhance the subject's marketability as a subdivision site. The market value estimated herein is predicated on the extraordinary assumption that Pardee Homes completes the adjacent infrastructure within a reasonable time period (12-24 months), which will provide access and utilities to the border of the subject property. If Pardee Homes does not complete the adjacent street and utility infrastructure within the estimated time frame, the subject value estimates would not be considered valid or accurate.
- The estimated value is also made under the extraordinary assumption that the owner's estimated entitlement costs are reasonable and accurate.

The value conclusions are based on the following hypothetical conditions that may affect the assignment results. A hypothetical condition is a condition contrary to known fact on the effective date of the appraisal but is supposed for the purpose of analysis.

The land is currently un-entitled. The entitled land value estimate assumes the hypothetical condition that
the subject is currently entitled (approved tentative tract map) indicating a 31 lot single family residential
subdivision with lot sizes averaging 7,500 SF.

C2-7 The attachment is a copy of a page from the subject property land evaluation/appraisal. This comment is for reference only and does not suggest an inadequacy in the analysis of the Draft PEIR.



Letter C3

 From:
 Beth Frice

 To:
 PLN_PlanningCEQA

Subject: Input into MTRP Master Plan Update

Date: Monday, February 27, 2017 1:09:27 PM

Good Afternoon.

- C3-1 From the Draft Program Environmental Impact Report for the Mission Trails Regional Park Master Plan Update, from Figure 3-5 Cowles Mountain Area Planning Recommendations:

 "R11: Construct a new trail connection from the Padre Dam water tank to the staging area in CM-F2 to create a portion of a large loop on the east side of Piles Peak and north side of Cowles Mountain."
- C3-2 I feel this route is inexcusably and inappropriately close to the housing already present. These homes were purchased with the knowledge that this was open space preserve without trails at this location. Adding a trail this close is disrespectful and discourteous to those homeowners. I am personally aware that the terrain is steep immediately behind where the proposed trail is located, however if it is essential that a trail must go in, I highly recommend that there should be a minimum distance of at least 2000 feet between trails and housing, just as there is for the protection of sensitive plants and wildlife.

If a trail must go in, it should be significantly further south, far enough away from the houses that voices and say a dog barking would not be heard, further South than what was proposed in Alternative A. Since R10 is proposed to "Close and restore the existing hiking trail located immediately behind the homes along Big Rock Road" is in the plans, WHY would it be acceptable to create a new trail immediately behind other homes? Additionally, I feel this is not a suitable location to have a trail that is utilized bicycles.

Thank you,

Elizabeth Frice Phone: (619) 456-2360

- C3-1 Trail locations were analyzed and selected to ensure preservation of large areas of undisturbed natural habitat and would require sensitive trail location and design to avoid visual scars (PEIR Section 3.2.2(b)). At the program level of review, impacts associated with the trail were determined to be less than significant. However, all future projects implemented in accordance with the MPU would require site-specific review to ensure sensitive trail design and consistency with the Plans' recommendations.
- C3-2 Pursuant to City CEQA thresholds, a noise impact would result if a significant increase in ambient noise levels occurs as a result of a project, or if people would be exposed to noise levels in excess of the City's noise ordinance, or if noise levels are incompatible with the City's Noise Compatibility Guidelines (2015).

As discussed in Draft PEIR Section 9.3, some of the subsequent projects contemplated by the MPU, including trail construction, could result in short-term construction activities that would generate minimal noise from construction equipment. This short-term impact would be considered less than significant. However, noise generated from people utilizing the trail, or barking dogs are considered short-term sources that do not rise to a level of significance requiring mitigation.

Letter C4

Draft Program Environmental Impact Report
Subject: Project Name; Mission Trails Regional Park Master Plan Update/Natural
Resources Management Plan/Community Plan Technical Amendments;
Project No.349988/SCH No. 2014041011

Date: February 13, 2017

C4-1 Introduction. This document responds to the request for public comment on the Draft Program Environmental Impact Report on the Mission Trails Regional Park Master Plan Update. It pertains to the City's plans to annex portions of the East Elliott Planning Area into Mission Trails Regional Park.

The City has misused a Habitat Conservation Plan, the Multiple Species Conservation Program (MSCP), to thwart residential development so the City can acquire the private property to include in the park. This is the opposite of what Habitat Conservation Plans and the MSCP are for. The City also has plans to site a possible additional landfill in East Elliott. Further, the City seeks more of the East Elliott property for conservation than it would ordinarily obtain if it implemented the MSCP as it is intended.

We believe this is illegal.

Public officials should review their values and priorities with regard to how the City is acquiring private land, and the City's plan to expand an already large park with residential property in the face of a severe housing shortage.

- C4-2 This document will cover the following:
 - · Definition of Habitat Conservation Plans
 - · Background to East Elliott
 - · Revised East Elliott Community Plan (1997) to exclude development
 - Zoning and housing density revision
 - · Development not feasible under City development policy
 - City decision to acquire all of private land
 - · City's answer to developer submission
 - · East Elliott reserved for new and expanded landfill
 - · City MSCP policy substitutes for Eminent Domain
 - · City ignores private owner protections
 - · City removes housing units during severe housing crisis
 - · Where has this gotten us? Adverse consequences of City policies.
 - Recommendation to restore development and obtain increased land for conservation & park expansion free of cost

C4-3 Habitat Conservation Plans. Habitat Conservation Plans are authorized by Federal legislation to provide for non-federal landowners to economically develop their property in areas that are habitat for endangered species. The MSCP is a federally licensed Habitat Conservation Plan.

C4-1 The MPU identifies specific planning recommendations for the East Elliott area. Planning Recommendation EE-P1 provides for the allowance of development of private property holdings within East Elliott consistent with the community plan, MSCP requirements, and the Mission Trails Design District Ordinance. The acquisition of private lands would be from willing sellers, or through development agreements for park expansion and MSCP habitat conservation purposes (Planning Recommendation EE-P2).

Landfill plans and/or expansions in the East Elliott area are not part of the proposed project.

C4-2 Comment noted.

C4-3 This comment does not address the adequacy or accuracy of the environmental document and no response is required.

The first Habitat Conservation Plan was established on San Bruno Mountain in Northern California. It was a new way to look at development and conservation. One county, three cities and private landowners and developers made sure that builders could plan for 3,000 homes, while providing habitat for species of butterflies and snakes. The U.S. Congress liked the partnership. It became a model for the nation. In 1982, Congress amended the Endangered Species Act to allow incidental take permits to be given to private landowners who establish 'conservation plans'.

The MSCP is a Habitat Conservation Plan for the City and County of San Diego. The MSCP allows private landowners to economically develop 25% of their property. In exchange, the City gets 75% of the property, at no cost, for conservation.

This arrangement clearly favors conservation interests. One must ask why City officials thought it was a good idea to try to obtain 100% of the privately owned property, and why would the City be willing to pay for the whole property when the City would otherwise obtain 75% of it free of cost?

C4-4 Background to East Elliott. In the 1960s and 1970s the Federal Government sold East Elliott to private citizens. East Elliott was formerly part of Camp Elliott, a military training base. Working with the City of San Diego, the land was sold for residential and limited commercial development. The area was zoned for residential use. As part of the sale, the Federal Government gave the City 2000-acres for public use. This acreage was to be the open space offset to the anticipated residential development. It was land subsequently incorporated into the early Mission Trails Regional Park

In 1981 the City requested that the owners organize to do the planning for East Elliott. The City promised cooperation. That led to the formation of the East Elliott Property Owners Association. The City named the Association the official planners for East Elliott. However, in 1993 the City called a halt to the planning. The City wished to consider East Elliott for an additional landfill. The City decided not to site a landfill in East Elliott at that time. However, the City did not resume planning with the owners. City officials had other ideas for use of East Elliott. That included reserving East Elliott land for a possible future landfill.

In the meantime, park advocates were at work to expand the size of Mission Trails Regional Park. It was then about 5800 acres. It was the largest such park in California, and one of the largest parks in the country. It has since been expanded to include 1100-acres of West Sycamore (near Stonebridge Estates). The Mission Trails Regional Park website lists the present size of the park as 7220-acres.

In 1991, the City started planning for the Multiple Species Conservation Program. Park advocates wanted to use the MSCP to add the privately held land in East Elliott to the park.

C4-4 This comment is informational and related to issues pertaining to the East Elliott Community Plan Update and the designation of land uses within the planning area. The comment does not address the adequacy or accuracy of the environmental document and no response is required.

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This might have been achievable in a way that respects the MSCP's purpose to allow private development. That is because the MSCP provides for 75% of the land to be given to the City free of cost in exchange for allowing the owners to develop 25% of their property. The zoning is RS1-8, 1-dwelling unit per 40,000 square feet (about 1 acre). That is very low density. It is compatible with development in the MSCP. The City would have retained a substantial amount of land by allowing residential development. But that is not what happened. City officials formulated a plan to obtain 100% of the private owners property.

The revised East Elliott Community Plan. The first step in the City's plan to obtain all of the land was to amend the East Elliott Community Plan. This occurred in 1997, the year the MSCP was adopted. The revision was purportedly to bring the plan into conformity to the MSCP. To the contrary, the revised Community Plan eliminates residential development in the entire East Elliott Multiple Habitat Planning Area (MHPA).

The Community Plan states:

Total

"Due to the natural resources on site and the factors described above which make urban development infeasible in much of East Elliott, a majority of this area is designated for long-term open space use. As such, a majority of the area (2,259 acres out of the 2,862 in the East Elliott Planning Area) will be one of the most important components of the City's Multiple Species Conservation Plan (MSCP)."

The latter area had for decades been designated for residential development. It is worthy of note that only a few years before the City was engaged in a residential planning effort before it cancelled the venture to explore East Elliott for another landfill.

The Community Plan omitted development except for a small portion (117-acres). The latter 117-acres was removed from the MHPA.

This is how the 1997 revised East Elliott Community Plan allocates property use:

LAND USES IN EAST ELLIOTT

Use	Acres
Open Space Residential	2,259
Residential	117
Commercial	12
Landfill	474

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This was the first leg in the City's adopting local regulations to thwart the intent and purpose of federal Habitat Conservation Plan legislation to provide for private owner development. The Fish and Wildlife Service calls these agreements partnerships.

C4-5 Zoning. The zoning remains 1-dwelling unit per 40,000 square feet. The City later adopted a policy that the City would (theoretically) only allow 1-dwelling unit per ownership parcel. That means if an owner held title to a 20-acre parcel, he or she would only be allowed 1-dwelling unit. That amounts to a 21 plus times reduction in residential density (one acre = 43,560 square feet). In the case of a 10-acre parcel, the reduction is 10 plus times in residential density.

This is how the City thwarts residential development.

Development is not feasible at 1-house per ownership parcel. At this density, the property is not economically developable. Major developers have expressed interest at the actual RS1-8 zoning. It is not feasible for a developer to invest in a development project at 1-dwelling unit per ownership parcel.

Costs to develop are also increased because the land is raw land, without infrastructure such as sewage, water or electrical service. There are no paved roads.

The Community Plan states the City's intention to acquire all the private property. The City plans to buy the property. The City may also acquire property from mitigation, or by owner dedication. Thus, the City chooses to buy property when it would obtain 75% of the property if it allowed development as the US Congress intended.

The City has needlessly spent millions of dollars of government funds pursuing this scheme.

<u>City Planning's answer to owners seeking property development.</u> Here is a quote from what City Planning advised an owner who submitted a development plan to Long Range Planning for Preliminary Review:

"The parcels in question are designated Open Space by the East Elliott Community Plan. The Open Space designation is intended to preserve habitat for a number of endangered or threatened wildlife species and will provide corridors to wildlife movement."

The MSCP mandates that 25% of an owner's property be allowed for development. This fact is omitted from the Planning Department document. No provision is stated for development at any density in the document.

C4-6

Reserving the area for a possible new landfill and landfill expansion. The Community Plan provides for landfill development. Landfills are contrary for use in Open Space areas. In addition to Sycamore Landfill, the Community Plan says: "A smaller landfill exists in a portion of this area...and expansion of this landfill is anticipated. This plan also recognizes the possibility that a portion of the area west of

C4-5 This comment does not address the adequacy or accuracy of the environmental document and no response is required.

C4-6 This comment does not address the adequacy or accuracy of the environmental document and no response is required.

Sycamore Canyon (within the Oak and Spring Canyon watershed), which is designated in this plan for open space use, could be considered for use as a landfill in the future."

In other words, the City is restricting East Elliott for residential development on the basis of environmental sensitivity. But the City is reserving the land, including land in the middle of privately owned property, the area now called Open Space, for later conversion to a new landfill.

The City is buying private owner property at low valuations purportedly for the MSCP, but could later convert the property to another landfill.

This is an evident continuation of the City's wish to install a new landfill in East Elliott stemming from 1993 when the City halted residential planning to study the area for a landfill.

C4-7 Purchasing land for the MSCP substitutes for the Right of Eminent Domain. All of the City's contemplated uses, adding land to Mission Trails Regional Park, installation and expansion of landfills, and acquiring more land for conservation are public uses. Cities have the right of Eminent Domain. In this case, the City is wrongly using the MSCP as a substitute for the City's Right of Eminent Domain.

Under Eminent Domain, a City must pay for highest and best use. Not so under the City's scheme for acquiring private property under the MSCP.

The City ignores MSCP owner protections. The originators of the MSCP attempted to protect the private owners from overzealous attempts to acquire more property for conservation than the 75% of the owner's land the City would ordinarily obtain. The City finds ways around these protections, or ignores them.

The protections are:

- The requirement that the City allow 25% of the owners² land for economic development. The requirement is mandatory.
- 2. Respect for Private Property Rights.
- 3. "No Surprises" Agreement
- 4. Sale of land to government only by "willing sellers".
- 5. No condemnation procedures for private land.
- 6. Deadline of 180-days for the City to make changes to the property.
- That public lands be incorporated in the MSCP preserve to the greatest extent possible to avoid increasing exactions on private land development.

The requirement to allow 25% of the owners' land for economic development is meaningless when the City reduces the allowed residential density from RS1-8 (about 1-dwelling unit per acre) to 1-dwelling unit per ownership parcel.

C4-7 See Response to Comment C4-1. The remaining issues raised in this comment are outside the scope of the project and do not address the adequacy or accuracy of the environmental document and no response is required.

5

- C4-8 There is no "respect for private property rights" when the City acts to thwart owner development, and to use the MSCP to obtain land for other purposes, including adding to the park, expanding garbage dumps, and obtaining more land for conservation.
- C4-9 The "No Surprises" Agreement is a Federal stipulation not to burden landowners if there is reason to obtain more land for conservation than originally anticipated. However, this is what the City is doing.

Sale of land to government only by "willing sellers". This is the City's explanation how it is able to obtain hundreds of acres from private owners who were highly motivated to develop their property. The owners were engaged with the City in planning a development for their property before the City summarily called a moratorium on residential planning to study East Elliott for another garbage dump. How does the City get "willing sellers"? By imposing onerous conditions on development (contrary to the purpose of the MSCP) and then offering to buy property from despairing owners. Courts have already ruled against government authorities in similar cases, calling such government practices "confiscatory". The courts have held that cities that are both the regulators and purchasers of private property are in a conflict of interest. And the courts have recognized that such practices are intended to prevent development and put downward pressure on property values on property the city wishes to purchase.

No condemnation procedures for private land. This is a stipulation to prevent a city from obtaining more land than is provided for in the MSCP (75% in exchange for allowing owner development). In this case, the City has created its own scheme for obtaining all of the owner's property.

The 180-day limitation for the City to make changes to the property was not respected. The City policy to restrict development to 1-dwelling unit per ownership parcel was written in 2003, six years after adoption of the MSCP.

Regarding the principle of incorporating public lands into the MSCP preserve, in this case the City made a bee-line to privately held East Elliott because the City wanted to add East Elliott to Mission Trails Regional Park, and site a landfill or landfills on the East Elliott property.

The City and County's housing crisis. One would never know that San Diego has a housing crisis that has been going on for many years, while the City has deliberately removed developable land to expand a park that is the largest in California. The middle class is especially hard squeezed by the housing crisis. One citizen told how his 37 years old daughter had to move out of San Diego County to another state. She had to move her family because she could not find a house in San Diego where she could afford to raise her kids. The father now communicates with his children over the Internet.

C4-10

The East Elliott Community Plan revision of 1997, in which 2,259 acres of residential property was converted to Open Space, removed 2460 homes from development. And this is at the very low density of 1-dwelling unit per 40,000 square feet.

- C4-8 See Response to Comment C4-1.
- C4-9 This comment does not address the adequacy or accuracy of the environmental document and no response is required.

C4-10 This comment does not address the adequacy or accuracy of the environmental document and no response is required.

6

	One hand doesn't know what the other is doing.		
	Bizarre.		
C4-11	Where has this gotten us? According to the Mission Trails Regional Park Master Plan Update (January 17, 2017), the City now owns 735 acres, about 28% of East Elliott. This is the amount of land acquired since the MSCP was adopted in 1997. Privately owned property is 743 acres. The Master Plan Design Consultant continues to report that East Elliott is a problem area. That is because many acres remain in private hands. It is not possible to close down unauthorized trails, construct approved trails, or provide contiguous trails as part of the management program for the Open Space area.	C4-11	The issues raised in this comment are outside the scope of the project and do not address an issue related to the current project/plans nor an issue regarding the adequacy or accuracy of the Draft PEIR, and no further response is required.
	If the City allowed the residential development that the MSCP was designed to provide, it would have obtained 75% of the available acreage free of cost. That would amount to 1108.5 acres $(735 + 743 = 1478$ acres $\times 75\% = 1108.5$ acres). That is 373.5 acres more land than the City has presently acquired (at a cost of many millions of dollars) in the approximately 20 years since the MSCP was adopted.		
C4-12	Boondoggle. A boondoggle is a project that is considered a waste of both time and money, yet is often continued due to extraneous policy or political motivations. (Wikipedia): An expensive and wasteful project usually paid for with public money. (Merriam-Webster).	C4-12	This comment does not address the adequacy or accuracy of the environmental document and no response is required.
C4-13	Like it or not, the City's scheme to add the East Elliott Planning Area to Mission Trails Regional Park has accomplished the following:	C4-13	This comment does not address the adequacy or accuracy of the PEIR and no response is required.
	I. Removed 2460 homes from housing development during a continuing severe housing crisis.		
	Needlessly spent millions of dollars to acquire property when the City would obtain 75% of the property free of cost if it allowed the development that the MSCP intends.		
	Acquired significantly less property by this means than if it allowed very low-density residential development.		
	 Put the City and County in legal jeopardy by thwarting Federal Habitat Conservation Plan Law. 		
	Created a patchwork of publicly and privately owned property that inhibits development and does not meet the goals for contiguity of property in the Open Space Area.		
	And much more.		
	2		

C4-14 Recommendations. The City needs to reconsider and remedy the damage it has caused. For these and many other reasons, the City should:

- 1. Remove East Elliott from the Mission Trails Regional Park Master Plan Update.
- 2. Combine the publicly and privately owned property for planning.
- 3. Restore the actual RS1-8 zoning.
- 4. Re-establish the East Elliott Community Planning Group.
- Work cooperatively with a major developer to design a clustered residential community based on the RS1-8 zoning.
- Plan the project to maximize contiguity of the 75% of the land the City will obtain (estimated 1108,5 acres) for addition to Mission Trails Regional Park in exchange for allowing development
- Consider raising the residential density in view of San Diego's housing crisis.
 One to five residential units per acre are considered very low density.
- Reimburse owners who have sold their property to the City with proceeds from the new development.

Respectfully submitted,

Stephen Goldfarb (619) 282-9208 C4-14 Comment noted. See responses to comments C4-1 through C4-13.

8

Letter C5

DIANA L. (MADAY) JOHNSON 950 BEECHWOOD RD BUFFALO GROVE, IL 60089 847-541-7851

February 18, 2017

Ms Myra Herrmann Senior Environmental Planner, City of San Diego 1222 First Ave, MS 501, San Diego, CA 92101

Dear Ms. Herrmann.

C5-1 As a part owner of a land parcel in East Elliot (366-031-15), I am writing my comments, regarding the Subject City project, as you requested.

In the Early 60's my dad purchased 9.05 acres of the East Elliott property after reviewing a beautiful housing development that was to be produced in this area. His plan was to buy this for when he retired. He never lived to see his dream come true. In the early 90's he found out that he would never be allowed to build on his property. He died in 1997 leaving this property to his children. I am the executor of that estate and I am appalled at the way the City has ignored us landowners.

I have written several letters to the City, Land fill, and Mission Park with not one of them being answered. The only time I hear from anyone concerning this property is when they send me reminders to pay my taxes, which has been done since the 60's. As I stand on the overpass and look into the valley and the bike trail from Mission Park I see it going right past or probably through our property. We never were informed that this trail was even going to be made.

We do not live in California and have to make a special trip out there to see for ourselves what is being done in and around our property. The new plan you are discussing should allow all of the landowners to receive fair market value for the property we have been investing in over the last 40-50 years.

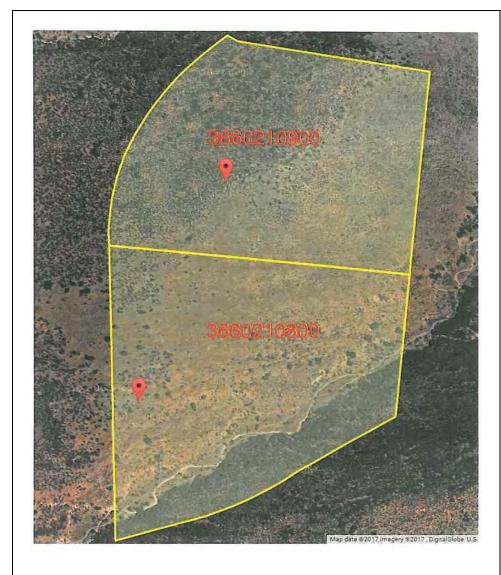
We support your efforts and hope the City of Dan Diego will begin to purchase these properties quickly before we have to leave it to the next generation. We are all in our 70's now. We are open to any and all offers.

Sincerely,

Diana L. (MADAY) Johnson Executor of Lawrence J Maday Estate C5-1 Comment noted. This comment does not address the adequacy or accuracy of the environmental document; however, the MPU does not propose any trails on private property. Please also see the responses to comments C2-3 and C9-1. No further response is required.

Letter C6 JWA J. Whalen Associates, Inc. Balancing the needs of the environment with those of husinass March 8th 2016 Ms. Myra Herrmann Environmental Planner, City of San Diego Planning Dept. 1010 Second Ave, MS 413 San Diego, CA 92101 Or email to either: Email: PlanningCEQA@sandiego.gov 1660 Horel Coute North Strite 728 RE: Program Environmental Impact Report, 349988 San Diego, California Dear Myra Herrmann: C6-1 Comment noted. 92108-2820 C6-1 Our firm J. Whalen Associates, has been operating in the San Diego market for over 20 years assisting our clients with their habitat mitigation and land use planning needs. We 619.683,5544 currently represent Mr. & Mrs. DeGrenier and Mr. and Mrs. Stephens, landowners of 619 683 5589 FAX parcels 3660210900 and 3660210800, which are located immediately north of Mission Trails Regional Park in the East Elliott area. Please find below our comments on the www.jwhalen.met draft Environmental Impact Report for the Mission Trails Regional Park Master Plan Update. C6-2 Please see the Response to Comment C4-1. **General Comments** C6-2 As a result of a long history of reduction in planned development in the East Elliott area, it has become plain that the only way forward for our clients is to sell the property for open space purposes, either as mitigation or outright purchase. Our property should be acquired by the city or others and incorporated into the Mission Trails Regional Park. This would align with the EIR and the East Elliot Community Plan. As a result of the city's actions, without being acquired, our clients are left with no reasonable use of their land. Pg. 3 Par. 5 - Mission Trails EIR Delineation The EIR states: "Two expansion areas - East Elliott and West Sycamore - would be incorporated into the official Park boundaries after approval of the Plans and bring the Park's total area to approximately 9,780 acres." Our property should be purchased by the city and be included in this expansion.

5.6.1. EE-P2 - East Elliott Master Plan Update Delineation C6-3 Comment noted. The referenced Community Plan policy is C6-3 The Community Plan mentions private property should be acquired so trails can be consistent with MPU policies referenced in Response to Comment constructed and formally opened for public use. "Continue to acquire land from willing sellers, or through development agreements for park expansion, and MSCP habitat C6-2. conservation purposes." Until purchased, we are unable to support the placement or relocation of trails through the property. Again, we very much appreciate the opportunity to share our comments on the Mission C6-4 Trails Regional Park Environmental Impact Report. We look forward to the successful C6-4 Comment noted. completion of this project, and the continual improvements to be made on Mission Trails. Should you have any questions regarding our comments, please do not hesitate to contact Tyler Martin of our office, 619-683-5544. Very truly yours, J. Whalen Associates, Inc., a California corporation by: James E. Whalen President Attachments: East Elliott Property 1, East Elliott Property 2



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Letter C7

 From:
 Mari McEachem

 To:
 PLN PlanningCEQA

Cc: billaceae@cox.net; Councilmember Scott Sherman; Fred Kramer
Subject: MTRP MPU / PROJECT No. 349988 / SCH No. 2014041011

Date: Tuesday, February 28, 2017 6:31:03 AM

Ladies and Gentlemen,

C7-1 Mission Trails Regional Park is such an important land parcel to our county. It's canyons, peaks and stream beds represent a glimpse of what Southern California was, prior to human development. The chaparral is precious home to so many native plant and animal species, many of which are unique to San Diego.

As you update your plan, I can only hope that you are taking walks along the hiking trails and seeing, hearing, smelling and experiencing this amazing treasure. Spring rains swell the banks of the San Diego River, and create a myriad of tiny waterfalls down the canyon slopes. Take a closer look and you'll spot patches of lovely new flowers on the face of boulders, little green fist-shaped curls with delicate white petals peaking out: those are California astrella, and they love to hang out with Bigelo Spike Moss and Trumpet Moss.

Head up to the Rim Trail and, if you're lucky and time things just right, you'll spot Chocolate Lilies peaking out of the deep grasses. Gently lift a handful of Wild Cucumber and smell the flowers, with their delicate jasmine scent. Listen to a mated pair of California Thrashers, building their nest in the Laurel Sumac, but don't tarry too long or you will get a major scolding!

Set up your work desks just south of Padre Dam, there's a sandy open area where you can put up a shade canopy. Now look closely at the Rock cliffs to the west and spot the Red Tailed Hawk parents tending their nest. As they soar overhead, listen for the alarm chirps of the ground squirrels, warning friends and family to be vigilant.

Pull an all-nighter down by Lake Kumeyaay in June. Take an early evening walk through the grasslands and watch the White Tail Kite hover over its prey, then dive and capture dinner in one swift move. Smell the sage, listen to the strange call of the Poorwill, and feel the night air stir slightly, from the southwest. Now look up in the sky and identify Venus, Mars, Saturn and even, on a clear, moonless night, the Milky Way!

In closing, I will say that MTRP is so much more than just a "land parcel". After all, Mission Valley was once a land parcel, and it literally disappeared, as an open space, in just ten short years. Perhaps that was inevitable, given it's central location in the city. But I will hope that, after reading what this unique park means to me and all of my furry, or feathered, or blooming friends, you will realize the enormity of your responsibility to protect, preserve and even increase the size of MTRP.

Respectfully yours,

Mari McEachern 5288 Irwin Ave San Diego, Ca 92120

Sent from my iPad

C7-1 Comment noted.

Letter C8

Feb 27, 2017

City of San Diegoflanning,

C8-1

Regarding the Mission Trails Regional Park Master Plan Update, I prefer to see the "Reduced Project Alternative" be adopted I think that fewer trails is the way to go to protect sensitive plants and area animals. And I believe this balance is important to all of us that enjoy the outdoors for all our different reasons.

project No. 349988 / SCH No. 201404/011

C8-1 Comment noted.

Letter C9

Jack Zarour Property Owner – Parcel # 366-070-65-00 P.O. Box 23877 San Diego, CA 92193 (619) 244-3187 meliorations@cox.net

March 8, 2017

Myra Herrmann
Senior Planner/Archeologist/Tribal Liaison City of San Diego – Planning Department
1010 2nd Avenue, Suite 1200
Executive Complex East Tower, MS 413
San Diego, CA 92101
(619) 446-5372 MHerrmann@sandiego.gov

Subject: Notice of Availability of a Draft EIR for the Mission Trails Regional Park Master Plan Update, Natural Resources Management Plan and Community Plan Technical Amendments (Project #349988)

Dear Ms. Herrmann,

- C9-1

 I have reviewed the current Draft EIR for the MTRP MPU (Project #349988). On May 2, 2014, when I had responded to the previous public review, I had presented steps to be taken into consideration. It is apparent that this MPU did not include my recommendations or the concerns of property owners in the proposed East Elliott extension to MTRP, where our property is squarely in the middle of, but rather, created and encouraged further public intrusion and trespassing on private property causing severe damage, vandalism and environmental destruction by not installing a barrier at the boundary of the MTRP at the HWY 52 underpass as my response had called for.
- C9-2 Although this Draft EIR is comprehensive, spanning several years of planning with great wonderful improvements for the MTRP system, the section as it relates to the proposed East Elliott extension just north of HWY 52 at the MTRP border cannot possibly be considered and must be amended or removed in entirety. For one, not all properties in the considered area belong to the City of San Diego, and especially our Parcel #366-070-65-00, which is at the center of it, will never be sold to the City of San Diego. Also, our property will be developed in the future to be the home of Saint James Monastery, see enclosed documents as presented to the City Council of the City San Diego on Monday March 6, 2017. The City of San Diego has had several opportunities to purchase our parcel over the years, but failed to follow through every time. Unless the MPU is amended to include Saint James Monastery you are hereby notified to stop planning any park extension north of HWY 52 and wasting funding dollars and taxpayer money. If you, Mr. Jeff Harkness (City of San Diego Planning Department) and/or Mr. Mark Carpenter of KTU +A, would like to meet to discuss the MPU to include the Saint James Monastery so that it can be re-presented to the City Council for approval, please do not hesitate to contact me. Thank you.

Sincerely,

Jack Zarour

CC: Fr. John Reimann, Fr. Antony Bahou, Rev. Deacons Thomas Nassif and Rico Paul Monge, Bill and Hazel Nassir, Myra Herrmann and Jeff Harkness – Planning Department, Mark Carpenter – KTU+A, Honorable Mayor Kevin Faulconer, Councilmembers Barbara Bry, Lorie Zapf, Christopher Ward, Myrtle Cole, Mark Kersey, Chris Cate, Scott Shermann, David Alvarez and Georgette Gomez, Casey Smith – Open Space Division, Hilda Mendoza – City Attorney, George Biagi – City Clerk, John Malki – Attorney

- C9-1 Comment noted. The MPU does not propose any trails on private property. The underpass is a wildlife crossing created as part of the SR-52 project. Any attempt to create a barrier to humans in this area would also create a barrier to wildlife movement.
- C9-2 The MPU recognizes that not all private property owners are willing to sell their land to the City, and those private property owners would retain their existing development rights. See also Response to Comment C1-1.

LETTER

RESPONSE

Jack Zarour Property Owner – Parcel # 366-070-65-00 P.O. Box 23877 San Diego, CA 92193 (619) 244-3187 meliorations@cox.net

March 6, 2017

San Diego City Council Meeting - 2PM

Good afternoon Honorable Mayor Kevin Faulconer and Esteemed Councilmembers,

On February 8, 2017, His Eminence, Metropolitan JOSEPH, the head of the Antiochian Orthodox Christian Archdiocese of North America, blessed the name of the monastery on our land to be, "Saint James Monastery, San Diego".

C9-3

This letter is to inform you that the City of San Diego has had several opportunities to purchase our parcel over the years, but failed to follow through every time. Moving forward, our parcel now can only be used for the Glory of God as a monastery to bring healing of soul and body to mankind (as I had outlined in letters to the City in 2014 and 2016), and as an eternal memorial to honor our late father, Louis Yacoub Zarour, and our departed brother, US Marine Corporal, Edward Louis Zarour. Any plans the City of San Diego has for the East Elliott area must comply with God's plan for Saint James Monastery.

July 5, 2016, I had presented to you a solution for the Homeless of the City of San Diego, to move East Village to East Elliott and create, "East Elliott Village". Here is a copy for this new Council to consider. Now with the vacancy of Qualcomm Stadium, this prime facility with kitchens, bathrooms, showers it would certainly be ideal to get all the homeless off the streets, out of the canyons and under bridges, to one location where they can be ministered to by the many organizations that are currently caring for them until the permanent solution is reached, East Elliott Village under the direction of Saint James Monastery, San Diego.

Thank you for your cooperation in advance to act on this matter that will benefit all parties, citizens and business owners of this great city, the homeless and make San Diego, truly America's Finest City, once again.

Sincerely,

Jack Zarour

CC: Fr. John Reimann, Fr. Antony Bahou, Rev. Deacons Thomas Nassif and Rico Paul Monge, Bill and Hazel Nassir, Myra Hermann and Jeff Harkness – Planning Department, Mark Carpenter – KTU+A, Honorable Mayor Kevin Faulconer, Councilmembers Barbara Bry, Lorie Zapf, Christopher Ward, Myrtle Cole, Mark Kersey, Chris Cate, Scott Shermann, David Alvarez and Georgette Gomez, Casey Smith – Open Space Division, Hilda Mendoza – City Attorney, George Biagi – City Clerk, John Malki – Attorney

C9-3 Please see the Response to Comment C9-2. The remainder of this letter does not address the adequacy or accuracy of the environmental document.

Jack Zarour
Property Owner – Parcel # 366-070-65-00
P.O. Box 23877
San Diego, CA 92193
(619) 244-3187 meliorations@cox.net

March 6, 2017

April McCusker
Asset Manager, Acquisitions – Real Estate Assets Department, City of San Diego
1200 Third Ave., Suite 1700
San Diego, CA 92101
(619) 236-6987 fax (619) 236-6706 amccusker@sandiego.gov

Dear Ms. McCusker,

C9-4

I have received your much-appreciated prompt response letter dated January 19, 2017 to our offer to sell our parcel to the City of San Diego. I ask your forgiveness for my delay in getting back to you, but two critical events have taken place that have made the offer to sell, no longer an option. First, on February 8, 2017, His Eminence, Metropolitan JOSEPH, the head of the Antiochian Orthodox Christian Archdiocese of North America, blessed the name of the monastery on this land to be, "Saint James Monastery, San Diego"; therefore, it is evidently God's will that Saint James Monastery is to be in San Diego, and not in Valley Center, Escondido or anywhere else. Second, the offer was contingent upon the camp and retreat center in Valley Center (Broken Rock Ranch) being available for purchase, which I had just confirmed that it is no longer for sale.

This letter is to inform you that the City of San Diego has had several opportunities to purchase our parcel over the years, but failed to follow through every time. Moving forward, our parcel now can only be used for the Glory of God as a monastery to bring healing of soul and body to mankind (as I had outlined in letters to the City in 2014 and 2016), and as an eternal memorial to honor our late father, Louis Yacoub Zarour, and our departed brother, US Marine Corporal, Edward Louis Zarour. Any plans the City of San Diego has for the East Elliott area must comply with God's plan for Saint James Monastery. Thank you.

Sincerely

Jack Zarour

CC: Fr. John Reimann, Fr. Antony Bahou, Rev. Deacons Thomas Nassif and Rico Paul Monge, Bill and Hazel Nassir, Myra Hermann and Jeff Harkness — Planning Department, Mark Carpenter — KTU+A, Honorable Mayor Kevin Faulconer, Councilmembers Barbara Bry, Lorie Zapf, Christopher Ward, Myrtle Cole, Mark Kersey, Chris Cate, Scott Shermann, David Alvarez and Georgette Gomez, Casey Smith — Open Space Division, Hilda Mendoza — City Attorney, George Biagi — City Clerk, John Malki — Attorney

C9-4 Please see Response to Comments C9-2 and C9-3.

Jack Zarour – East Elliott Property Owner P.O. Box 23877 San Diego, CA 92193 (619) 244-3187 meliorations@cox.net

Mission Trails Regional Park Citizen's Advisory Committee Mission Trails Regional Park Visitor and Interpretive Center One Father Junipero Serra Trail, San Diego, CA 92119

July 5, 2016

Re: MTRP Master Plan Update and Natural Resource Management Plan presentation — Move East Village to East Elliott – "East Elliott Village"

Good Evening Ladies and Gentlemen,

C9-5

If we had 9,000 cats and dogs on the streets in downtown San Diego, the media and the citizens of this great city would have had them all adopted in homes by now. But with over 9,000 human beings made in the image of God - men, women and children, just like you and me - who eat, drink, sleep and go to the bathroom; and who are living on the sidewalks, under bridges and in canyons and panhandling on the street corners, we are impotent. The time is ripe for a solution – a favorable solution for everyone:

In your last meeting on 5/19/2016, I had made a public comment on the MTRP Master Plan Update, and I read a portion of a written response I had made back in May 2014 featuring a plan for a monastery, Orthodox Christian Camp, retreat center and even a cemetery, during that meeting I requested the City of San Diego to donate 313 acres so that San Diego's homeless will have a place to live and be healed and resolve the homeless problem once and for all, and be a model for other cities to follow. Citizens of this great city, developers, philanthropists, businesses and existing organizations are to work in a cooperative effort to use the land to have the homeless participate in building their own homes, growing and preparing their food and clinics for their physical and mental care, and to call that place, "East Elliott Village". This is what is needed now, more than half of the coherent homeless I have interviewed want this, and **not one** homeless person interviewed wished to remain as they are, on the streets. All together, we need to take steps to make this a reality:

The City of San Diego is to properly compensate current and past East Elliott property
owners who have lost over an estimated \$700 Million by being deprived of developing
their land; a fund is to be set by the City, to pay reparations of \$1,000.00 per acre, per
month of ownership and to be paid to them. Most the money in this fund will be from
the savings of reducing the need of the City Emergency response, Police, Fire and
Paramedics related to the homeless as it is now.

C9-5 This comment does not address the adequacy or accuracy of the environmental document.

- 2. Move all homeless people from the streets in downtown, under bridges, canyons and street corners, along with their belongings to make "East Elliott Village" their new 'home', permanently or temporarily. Those who able, will develop self-worth and learn the skills needed to later be able to hold jobs in the construction, agriculture, food service and hospitality industries and at some point, be re-integrated in society as taxpaying citizens, no longer a burden.
- City of San Diego residents will benefit from not having homeless people outside their doors, especially downtown residents, and they themselves can come to "East Elliott Village", volunteer and participate in this effort of helping their fellow men and women in getting back on their feet.
- Doctors, psychiatrists, dentists, physical therapists and others can volunteer their services in on-site clinics, daily or on an as need basis.
- Mountain bikers, hikers, equestrians can also come and volunteer and focus energy in helping fellow mankind constructively and visit 'organic shops' for refreshment, water, food outlets and rest area.
- 6. The City of San Diego is to fully permit a cemetery and a burial society to bury the dead with dignity.
- 7. The City of San Diego is also to fully permit all aspects of "East Elliott Village" as well as a monastery to be named, "St. James Monastery", dedicated to the Patron Saint of the City of San Diego, which will be vested with the authority to oversee all operations and dedicated to the healing of soul and body for all who visit, work and volunteer.

After studying the MTRP Master Plan with all the proposed MTRP East Elliott Extension trails being routed to encircle our property and many others, this plan of "East Elliott Village" will fit perfectly right in the center of the existing East Elliott vacant lands and will be an asset and benefit to any future MTRP park extension, and at the same time, preserving the most important resource — more important than plants and animals - human beings — transforming their hopeless, homeless condition to one of self-worth, dignity and to provide them the opportunity to become productive citizens! I would like to ask you to open your hearts and eyes, to see "East Elliott Village" is good for the citizens of San Diego, is good for the developers, is good for the East Elliott Property Owners and is definitely good for the homeless people throughout the county and I would encourage everyone to seriously consider this comprehensive solution and to get behind the move of East Village to East Elliott. Thank you, and God bless you.

Sincerely,

Jack Zarour Sd james

Cc: Honorable Mayor Kevin Faulconer, Esteemed Council Members: Sheri Lightner, Chris Cate, Todd Gloria, Myrtle Cole, Mark Kersey, Lorrie Zapf, Scott Sherman, David Alvarez and Marti Emerald, Chris Zirkle, Jeff Harkness, Lane MacKenzie, City Attorney, City Clerk and John Malki

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Letter C10

From: Path

Subject: Mission Trails Regional Park Master Plan Update, Project # 349988 / SCH No. 2014041011

Date: Tuesday, January 31, 2017 1:34:17 PM

C10-1 This is to apprise you that we would love to have more and better "single track" trails for mountain

Mountain bikers are not as keen on the wider tracked fire roads.

Best wishes,

Patty Mooney & Mark Schulze Crystal Pyramid Productions 7323 Rondel Court San Diego, California (619) 644-3000 C10-1 The City acknowledges the comment. This comment does not raise an issue related to the adequacy or accuracy of the Draft PEIR. No further response is required.

Final
Program Environmental Impact
Report for the
Mission Trails Regional Park
Master Plan Update
San Diego, California
Project No. 349988
SCH No. 2014041011

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- G: Paleontological Resource Assessment
- H: Traffic and Parking Memorandum
- I: Public Utilities

Acronyms and Abbreviations

°F Degrees Fahrenheit

AB Assembly Bill

ADT Average Daily Traffic

ALUC Airport Land Use Commission
ALUCP Airport Land Use Compatibility Plan

AMSL Above Mean Sea Level

APCD San Diego County Air Pollution Control District

APE Area of Potential Effect

ASMD Area-Specific Management Directives
ASTM American Society for Testing and Materials

B.P. Before Present
BAU Business As Usual

BMP Best Management Practice

CAA Clean Air Act

CAC Citizens' Advisory Committee
CAFE Corporate Average Fuel Economy
CalEEMod California Emissions Estimator Model
CAL FIRE California Department of Forestry and Fire

Cal-IPC California Invasive Plant Council

Caltrans California Department of Transportation

CAP Climate Action Plan

CAPCOA California Air Pollution Control Officers Association

CARB California Air Resources Board

CBC California Building Code

CCR California Code of Regulations C&D Construction and Demolition

CDFW California Department of Fish and Wildlife

CEC California Energy Commission

CEQA California Environmental Quality Act

CERCLA Comprehensive Environmental Response, Compensation and Liability Act

CESA California Endangered Species Act

CFR Code of Federal Regulations

City City of San Diego

CNCCPA California Natural Communities Conservation Planning Act

CNDDB California Natural Diversity Database

CNPS California Native Plant Society

CO Carbon Monoxide CO₂ Carbon Dioxide

CPA Community Planning Area

CPIOZ Community Plan Implementation Overlay Zone

CRHR California Register of Historical Resources

CUP Conditional Use Permit

CWA Clean Water Act

CWMA Coastal Cactus Wren Management Area
DEH Department of Environmental Health
DPR Department of Parks and Recreation
DTSC Department of Toxic Substances Control

ED Environmental Designee
EIR Environmental Impact Report

EO Executive Order

ESA Endangered Species Act of 1973 ESL Environmentally Sensitive Lands

FEMA Federal Emergency Management Agency

FESA Federal Endangered Species Act

FIRM Flood Insurance Rate Map

Foundation Mission Trails Regional Park Foundation

FRS Flow Regulatory Structure FUDS Formerly Used Defense Site

GHG Greenhouse Gas

GWP Global warming potential

HA Hydrologic Area

HCP Historical Commemorative Program
HRG Historical Resource Guidelines
HRR Historical Resource Regulations

HSA Hydrologic Subarea

HRB Historical Resources Board

HU Hydrologic Unit I-8 Interstate 8

IA Implementing Agreement
IBC International Building Code
ITA Incidental Take Authorization

ITP Incidental Take Permits

ITS Intelligent Transportation System
JRMP Jurisdictional Runoff Management Plan

LDC Land Development Code
LEA Local Enforcement Agency
LID Low Impact Development

LOMR-F Letter of Map Revision based on Fill

LOS Level of Service

LUST Leaking Underground Storage Tank

MBTA Migratory Bird Treaty Act
MCAS Marine Corps Air Station
MDP Master Development Plan
MHPA Multi-Habitat Planning Area

MMRP Mitigation Monitoring and Reporting Program MMTCO₂E Million Metric Tons of Carbon Dioxide Equivalents

MOU Memorandum of Understanding

mpg Miles Per Gallon MPU Master Plan Update mph Miles Per Hour

MRZ Mineral Resource Zone

MS4 Municipal Separate Storm Sewer System
MSCP Multiple Species Conservation Program
MTCO₂E Metric Tons of Carbon Dioxide Equivalents
MTDDO Mission Trails Design District Ordinance

MTRP Mission Trails Regional Park

MTS San Diego Metropolitan Transit System NAAQS National Ambient Air Quality Standards

NAGPRA Native American Graves Protection and Repatriation Act

NAHC Native American Heritage Commission
NDP Neighborhood Development Permit
NHPA National Historic Preservation Act

NOANotice of AvailabilityNO₂NOPNotice of Preparation

NPDES National Pollutant Discharge Elimination System

NRHP National Register of Historic Places
NRMP National Resources Management Plan

O₃ Ozone

OES Office of Emergency Services
OHWM Ordinary High Water Mark
Park Mission Trails Regional Park

PEIR Program Environmental Impact Report

Plans Mission Trails Regional Park Master Plan Update and

Natural Resources Management Plan

PM₁₀ Particulate Matter With an Aerodynamic Diameter of 10 Microns or Less

PRC Public Resources Code
PUD Public Utilities Department
RAQS Regional Air Quality Standards
RAWP Remedial Action Work Plan

REC Recognized Environmental Concern
RCRA Resource Conservation and Recovery Act

ROG Reactive Organic Gas

RPS Renewables Portfolio Standard RTP Regional Transportation Plan

RWQCB San Diego Regional Water Quality Control Board

SANDAG San Diego Association of Governments

SARA Superfund Amendments and Reauthorization Act

SB Senate Bill

SCAB South Coast Air Basin SDAB San Diego Air Basin

SDAPCD San Diego Air Pollution Control District
SDCWA San Diego County Water Authority

SDFD San Diego Fire-Rescue Department

SDG&E San Diego Gas and Electric SDMC San Diego Municipal Code

SDMMP San Diego Mitigation Monitoring Program
SDNHM San Diego Natural History Museum

SDP Site Development Permit
SDPD San Diego Police Department

SDRAA San Diego County Regional Airport Authority

SDRMP San Diego River Park Master Plan

SDSU San Diego State University
SFHA Special Flood Hazard Area
SIP State Implementation Plan

SMARA Surface Mining and Reclamation Act

SO₂ Sulfur Dioxide SR State Route

SWPPP Storm Water Pollution Prevention Plan SWRCB State Water Resources Control Board TCM Transportation Control Measures TCP Traditional Cultural Properties

TDM Transportation Demand Management

TMDL Total Maximum Daily Load UDC Unified Disaster Council

U.S. EPA United States Environmental Protection Agency

USACE United States Army Corps of Engineers

USC United States Code

USFWS United States Fish and Wildlife Service

USGS United States Geological Survey

UXO Unexploded Ordnance

VHFHSZ Very High Fire Hazard Severity Zone
VPHCP Vernal Pool Habitat Conservation Plan

VPMMP Vernal Pool Management and Monitoring Plan

WMA Watershed Management Area
WMI Watershed Management Initiative
WRCC Western Regional Climate Center

WTI Western Tracking Institute

WQIP Water Quality Improvement Plan



Executive Summary

ES.1 Proposed Project

Project Location and Setting

The area of the Master Plan Update (MPU), and Natural Resources Management Plan (NRMP), and Community Plan Technical Amendments (collectively, the Plans) for Mission Trails Regional Park (MTRP or Park) is located near the center of metropolitan San Diego, 8 miles northeast of Downtown San Diego, midway between the Pacific Ocean and the Cleveland National Forest. The Park is almost entirely within the City; however, it is within or near several jurisdictions, including the Cities of La Mesa, Santee, and El Cajon to the east; the City of Poway to the north, and unincorporated San Diego County to the northeast. With the addition of the proposed expansion areas, the Park would be bisected by Marine Corps Air Station Miramar.

The Park is operated and maintained by the City of San Diego (City) in close partnership with the Mission Trails Regional Park Foundation (Foundation). The existing 5,830-acre Park is split into four areas: Lake Murray, Cowles Mountain, Mission Gorge, and Fortuna Mountain. Two expansion areas—East Elliott and West Sycamore—would be incorporated into the official Park boundaries upon approval of the Plans and certification of this Program Environmental Impact Report (PEIR), which would bring the Park's total area to approximately 9,780 acres. All of these areas represent the study area for this PEIR.

The Park contains a variety of topographic features, including canyons, valleys, mountains, hills, and low-lying areas. The topography is generally very rugged, with elevations ranging dramatically, from approximately 100 feet above mean sea level (AMSL) along the San Diego River to 1,593 feet AMSL at the summit of Cowles Mountain. A little more than 10 percent of the study area has slopes steeper than 50 percent. The Park is within two watersheds: San Diego River and Los Peñasquitos Creek. The majority of the Park is within the San Diego River watershed, which has its headwaters in the Cuyamaca Mountains near Julian and its terminus in San Diego near Mission Bay.

Project Description

The Project comprises the implementation of the Plans for the Park. The Plans have been developed as an integrated set of management guidelines for the Park, with the MPU focusing on public access and recreation and the NRMP focusing on natural resources. The Plans were prepared concurrently in order to coordinate the recommendations and management actions for the six areas that comprise the study area—Lake Murray, Cowles Mountain, Mission Gorge, Fortuna Mountain, East Elliott, and West Sycamore.

The MPU provides updated recommendations to the 1985 Master Plan. The MPU recommendations range from broad overarching policy and management-related topics that affect the entire Park, to specific physical improvements. The MPU recommendations are focused on improving overall land/resource management, the safety and sustainability of recreational trails, improving recreational access, and eliminating conflicts between recreational uses and natural habitat.

The MPU identifies conceptual projects that may be implemented after adoption of the Plans. These are referred to as "subsequent projects" throughout the PEIR. Such projects recommended by the MPU include, but are not limited to, trail improvements, trailheads, picnic and shade areas, restrooms, parking areas, and interpretive overlooks. Subsequent projects identified in the MPU are conceptual, including trail alignments discussed below. The MPU does not provide for any specific location or design for subsequent projects that may potentially be implemented. These subsequent projects would require further design and review as they are proposed.

The NRMP sets forth adaptive management actions to ensure long-term, viable populations of sensitive species and habitats within the Park. It also sets forth protocols (e.g., data collection methods, success criteria) to evaluate the effectiveness of these management actions. The NRMP fulfills a requirement identified in the City's Multiple Species Conservation Program (MSCP) Subarea Plan to set forth an adaptive management framework in order to protect sensitive biological resources at the Park.

Other NRMP management actions—such as monitoring, weeding, or restoration—may have the potential to in turn cause environmental impacts. However, the NRMP also details minimization measures that would be required to be followed prior to implementation. Therefore, the NRMP would generally not result in environmental impacts, but is analyzed where necessary throughout the PEIR.

ES.2 Project Objectives

The Plans address the long-term protection of natural resources and development goals in support of recreation and interpretation within the Park. For the purposes of this PEIR, the goals of the Plans are the objectives of the Project as defined by the California Environmental Quality Act (CEQA) Guidelines:

1. Provide a structure for ongoing land and resource management actions required to maintain the Park and protect its resources.

- 2. Identify unsafe or unsustainable sections of recreational trails and provide guidance for the types of management action required.
- 3. Identify missing or constrained linkages within the Park and provide new or alternative routes to improve the recreational connectivity while protecting the Park's natural and cultural resources.
- 4. Integrate the management actions identified in the NRMP with the recreational trails network throughout the Park.
- 5. Provide amenities that support the recreational uses that currently exist or are proposed as part of the MPUPlans.

ES.3 Areas of Controversy

Areas of controversy associated with the Plans center around striking a balance between resource conservation and providing enhanced recreational amenities for Park users (i.e. trail, mountain bike, and equestrian).

ES.4 Project Alternatives

In order to fully evaluate the environmental effects of proposed projects, CEQA mandates that alternatives to the proposed project be analyzed. Section 15126.6 of the state CEQA Guidelines requires the discussion of "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 the evaluation of the comparative merits of the alternatives. The alternatives discussion is intended to "focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project," even if these alternatives would impede to some degree the attainment of the project objectives.

Alternatives to the adoption and implementation of the Plans are evaluated in Chapter 10 of this PEIR for the Park. The evaluations analyze the ability of each alternative to further reduce or avoid significant environmental effects of the proposed Plans. Each major issue area included in the impact analysis of this PEIR has been given consideration in the alternatives analysis. This PEIR evaluates two alternatives to the proposed Plans and associated discretionary actions including: (1) No Project Alternative and (2) Reduced Project Alternative.

No Project Alternative

The No Project Alternative would include limited implementation of the 1985 Master Plan, which provides guidance for the development of an urban regional park to meet current and future recreational, educational, and cultural needs of the San Diego region. The No Project Alternative represents limited implementation of the 1985 Master Plan because a number of proposals in the 1985 Master Plan for construction of structures and amenities would no longer be feasible under the existing regulatory framework since current regulations provide additional protections for

biological resources compared to when the 1985 Master Plan was adopted. For example, restrictions under the City of San Diego MSCP Subarea Plan, environmentally sensitive lands (ESL) regulations and brush management regulations would restrict development of some of the larger uses identified in the 1985 Master Plan such as a multi-use center in the West Fortuna area, an interpretive center in East Fortuna area, and multiple developed day use and camp areas. Proposals in the 1985 Master Plan that could be implemented under the existing regulatory framework include the extension of Clairemont Mesa Boulevard and Jackson Drive into the Park boundaries, providing connections to Mission Gorge Road.

More specifically, since adoption of the 1985 Master Plan, areas within and surrounding the Park have taken on greater significance as a core area for the region's sensitive biological resources and are subject to greater levels of protection under the City of San Diego MSCP Subarea Plan. Although proposed passive recreational uses envisioned by the 1985 Master Plan would be considered compatible with the Subarea Plan (Multi-Habitat Planning Area [MHPA] Guideline B10), development of the larger future uses would not be allowed under the current MSCP. For example, Subarea Plan MHPA Guideline B4 states that "[A] condition of coverage for San Diego ambrosia requires 90 percent preservation of the population at the Mission Trails Regional Park site". This requirement creates environmental constraints beyond what existed when the existing Master Plan was approved in 1985 and limits full implementation of all proposals in the existing Master Plan.

Implementation of the No Project Alternative would not avoid any of the identified significant and mitigable impacts of the Project, nor would it reduce any impacts associated with the Project. The No Project Alternative would also slightly increase impacts associated with land use, visual effects, biological resources, traffic/circulation, hydrology/water quality, and geology/soils.

Under the No Project Alternative, the proposed Plans would not be adopted by the City and the integrated set of management guidelines focusing on public access and recreation under the MPU and natural resources under the NRMP would not be implemented. The expansion areas (East Elliott and West Sycamore-areas) would not be officially incorporated into the Park boundaries and the associated Community Plan amendments would not occur. Under the No Project Alternative, the Park would not be subject to the updated policies and management recommendations in the Plans that would minimize environmental impacts. The No Project Alternative would not provide updated management recommendations that would preserve sensitive biological resources within the Park, and unauthorized use of existing trails within the Park would continue. Implementation of the No Project Alternative would not provide updated management recommendations through an NRMP on City fee-owned property outside of the Park boundary; however, management obligations in accordance with the MSCP Implementing Agreement to maintain barriers and prevent entry into areas with sensitive biological resources would continue. Unauthorized trails on City fee-owned property outside of the Park boundary have been closed and would continue to be enforced for closure by City Park Ranger staff. These efforts include enforcement on City fee-owned environmentally sensitive areas, posting of signs prohibiting public access to areas that are closed or under habitat restoration, and erecting informational barricades where necessary to reduce and eliminate unauthorized trail use/access outside of the Park boundaries. Under the No Project Alternative, these efforts by City Park Ranger staff would continue without the benefit of the MPU policies and recommendations, and resource management recommendations contained in the NRMP. Private property owners would

continue to have the right to defend their property from unauthorized trail trespass under the No Project Alternative.

Reduced Project Alternative

Under the Reduced Project Alternative, the proposed trail plan would be modified within the East Elliott area. The proposed trail plan for all other areas would remain the same. Adoption of the NRMP would occur under this Alternative, similar to the Project. The Reduced Project Alternative was developed based on input provided by California Department of Fish and Wildlife and United States Fish and Wildlife Service (Wildlife Agencies). The Reduced Project Alternative would remove the proposed Sycamore Canyon connection and the trail alignment that would extend along the western boundary of the Park. This trail is shown on Figure 3-8 of the PEIR associated with Recreation Recommendation R4. This would result in two smaller trail loops in the western portion of the East Elliott area. The Wildlife Agencies requested the removal of these trail components to protect existing intact habitat, decrease the potential for the incursion of exotics species, and avoid disruption of wildlife movement, restriction of wildlife refuge areas, and negative effects to wildlife composition. Similarly, the Wildlife Agencies requested removal of the trail alignment that would pass through the Oak Canyon/State Route 52 area due to the potential for human-caused habitat disturbances to alter wildlife movement through this area. The Reduced Project Alternative would also remove the proposed east-west trail alignment south of Sycamore Landfill and would result in a reduction of associated trail amenities due to elimination of trails. The smaller footprint of the Reduced Project Alternative would reduce the amount of active use areas that would be constructed compared to the project and increase the amount of land preserved as natural habitat.

Implementation of the Reduced Project Alternative would <u>slightly reduce impacts associated with land use</u>, visual effects, air quality, greenhouse gas emissions, biological resources, historical resources, hydrology and water quality, geology and soils, paleontological resources, public services, and public utilities. However, this alternative would not completely avoid any of the identified significant and mitigable impacts of the Project, and some impacts reduced in severity would remain. However, this alternative would slightly reduce impacts associated with land use, visual effects, air quality, greenhouse gas emissions, biological resources, historical resources, hydrology and water quality, geology and soils, paleontological resources, public services, and public utilities.

However, this alternative would not meet all of the Project objectives to the same degree as the project. Specifically, the Reduced Project Alternative would not improve recreational connectivity to the same degree as the Project because it would not provide the Sycamore Canyon trail connection or the proposed trail extending along the western boundary of the Park which would reduce trail connectivity and access for Park patrons. The MPU would still contain updated recommendations necessary to provide a structure for ongoing land and resource management and establish a framework for identifying unsafe or unsustainable sections of recreational trails. It would, however, provide fewer trails and recreational amenities, which would reduce public access. The NRMP would still be implemented, which would in turn serve to protect biological resources within the Park. The Reduced Project Alternative would not fully meet the project objectives as it would remove a key point of connectivity (Sycamore Canyon) and the trail alignment that would extend along the western boundary of the Park, reducing trail access for Park patrons, and as such would not meet the objective to "provide new or alternative routes to improve the recreational connectivity while

protecting the Park's natural and cultural resources." Furthermore, this alternative would likely result in less usable areas of the Park, which would not fully meet the objective of providing new or alternative routes to improve the recreational connectivity of the region. Although the Wildlife Agencies requested removal of those components to reduce potential impacts on biological resources, implementation of mitigation measures BIO-1 through BIO-3 would reduce impacts to biological resources associated with the Project to less than significant. Consequently, the Project objective to "provide new or alternative routes to improve the recreational connectivity while protecting the Park's natural and cultural resources" is better met by the Project.

ES.5 Summary of Significant Impacts and Mitigation Measures that Reduce the Impact

Table ES-1 summarizes the results of the environmental analysis including the potentially significant environmental impacts of the proposed Plans and proposed mitigation measures to reduce or avoid these impacts. Impacts, including analysis of cumulative impacts, and mitigation measures are organized by issue in Chapter 6.0, Environmental Analysis. Chapter 6.0 also includes discussions of proposed policies that would reduce identified impacts.

Table ES-1 Summary of Environmental Impacts and Mitigation Measures			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Would implementation of the Plans and associated discretionary actions result in a conflict with the goals, objectives, and recommendations of the General Plan, the Land Development Code (LDC), or the Tierrasanta, East Elliott, and Navajo Community Plans and the Rancho Encantada Precise Plan?	Implementation of the Plans and associated discretionary actions would be consistent with the General Plan; the LDC; or the Tierrasanta, East Elliott, and Navajo community plans; and the Rancho Encantada Precise Plan. Implementation of the Plans would not conflict with any applicable land use plan, goal, or objective of the General Plan; Municipal Code; and the Navajo, Tierrasanta, and East Elliott community plans; or the Rancho Encantada Precise Plan. Preparation of the NRMP for the Park was in direct response to the need for consistency with the MSCP. Technical amendments to the community plans (Tierrasanta, East Elliott, Navajo) and Precise Plan (Rancho Encantada) required to implement the Plans would result in impacts that would be less than significant. Therefore, no mitigation would be required.	None required.	Less than significant
Would implementation of the Plans and associated discretionary actions be consistentconflict with the density calculations, design standards, use restrictions, and any other development regulations of the City's LDC related to the applicable zoning regulations and as a result, cause an indirect or secondary environmental impact to occur?	The Plans and subsequent projects would not conflict with any aspect of the LDC. None of the contemplated subsequent projects would change any land use designation or intensity, and would be allowable uses within all zoning categories of the study area. Impacts would be less than significant.	None required.	Less than significant

	Table ES-1 Summary of Environmental Impacts and Mitigation Measures			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation	
Would implementation of the Plans and associated discretionary actions result in a conflict with adopted environmental plans, including the City of San Diego's MSCP Subarea Plan and Multi-Habitat Planning Area (MHPA) adopted for the purpose of avoiding or mitigating an environmental effect for the area?	The Plans and subsequent projects would consist of allowable uses within the MHPA such as public access/passive recreation projects per Section 1.4.1 of the MSCP Subarea Plan (MPU) or scientific and biological activities (NRMP); therefore, there would be no conflict with land use compatibility. Management activities contemplated by the NRMP would not conflict with the MHPA Land Use Adjacency Guidelines per Section 1.4.3 of the MSCP Subarea Plan. However, subsequent projects implemented under the MPU-Plans would introduce additional recreational uses within or adjacent to the MHPA. Impacts would be significant (Impact LU-1) and mitigation is required.	MM-LU-1: Subsequent projects implemented in accordance with the MPU Plans which are within or adjacent to the designated MHPA areas shall comply with Section 1.4 Land Use Considerations and Section 1.5 Framework Management Plan of the MSCP Subarea Plan in terms of land use, drainage, access, toxic substances in runoff, lighting, noise, invasive plant species, grading, and brush management requirements. Mitigation measures include, but are not limited to: sufficient buffers and design features, barriers (rocks, boulders, signage, fencing, and appropriate vegetation) where necessary, lighting directed away from the MHPA. The project biologist for each subsequent project would identify specific mitigation measures needed to reduce impacts to below a level of significance. Subsequent environmental review would be required to determine the significance impacts from land use adjacency and compliance with the Land Use Adjacency Guidelines of the MSCP Subarea Plan. Prior to approval of subsequent projects in an area adjacent to a designated MHPA, the City's Environmental Designee (ED) shall identify specific conditions of approval in order to avoid or to reduce potential impacts adjacent to the MHPA.	Less than significant	
		 Drainage: All new and proposed parking areas and developed areas in and adjacent to the preserve would not drain directly into the MHPA. All developed and paved areas would 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 would be maintained approximately once a year, or as often as needed, to ensure proper functioning. Maintenance would include dredging out sediments if needed, removing exotic plant 		

Table ES-1 Summary of Environmental Impacts and Mitigation Measures				
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation	
		materials, and adding chemical-neutralizing compounds (e.g., clay compounds) when necessary and appropriate.		
		Toxics: Land uses, such as recreation and agriculture, that use chemicals or generate byproducts such as manure, that are potentially toxic or impactive to wildlife, sensitive species, habitat, or water quality need to incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA. Such measures would include drainage/detention basins, swales, or holding areas with non-invasive grasses or wetland-type native vegetation to filter out the toxic materials. Regular maintenance would be provided. Where applicable, this requirement would be incorporated into leases on publicly owned property as leases come up for renewal.		
		 Lighting: Proposed lighting of all developed areas adjacent to the MHPA would be directed away from the MHPA. Where necessary, development would provide adequate shielding with non-invasive plant materials (preferably native), berming, and/or other methods to protect the MHPA and sensitive species from night lighting. 		
		Noise: Uses in or adjacent to the MHPA would be designed to minimize noise impacts. Berms or walls would 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. Excessively noisy uses or activities adjacent to breeding areas would incorporate noise reduction measures and be curtailed during the breeding season of sensitive species. Adequate noise reduction measures would also be incorporated for the remainder of the year.		
		Barriers: New development adjacent to the MHPA may be required to provide barriers (e.g., non-invasive vegetation,		

		Table ES-1 al Impacts and Mitigation Measures	
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		rocks/boulders, fences, walls, and/or signage) along the MHPA boundaries to direct public access to appropriate locations and reduce domestic animal predation.	
		 Invasives: No invasive nonnative plant species would be introduced into areas adjacent to the MHPA. 	
		Brush Management: New residential development located adjacent to and topographically above the MHPA (e.g., along canyon edges) would be set back from slope edges to incorporate brush management areas on the development pad and outside of the MHPA. No residential development would occur specifically under the Plans; therefore, this would not be required.	
		Grading/Land Development: Manufactured slopes associated with site development would be included within the development footprint for projects within or adjacent to the MHPA.	
Visual Effects and Neighborhoo	d Character		l
Would implementation of the Plans and associated discretionary actions result in a substantial change to the natural topography or other relief features?	Subsequent projects contemplated by the MPU-Plans are not expected to result in a substantial change to the natural topography or other ground surface relief features that would create a significant visual impact as a result of a landform modification. In compliance with the City's Consultant's Guide to Park Design & Development. Recommendations for recreational amenities, parking areas, and trails assume a design that would generally follow the natural contours of the land and would not require the natural topography to be significantly altered. Impacts would be less than significant.	None required.	Less than significant

	Table ES-1 Summary of Environmental Impacts and Mitigation Measures			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation	
Would implementation of the Plans and associated discretionary actions results in the blockage of public views from designated open space areas, roads, or to any significant visual landmark or scenic vistas? Would Plans adversely affect the existing visual character of the City of or community plan areas, particularly with respect to views from major roadways, public viewing areas, vistas, or open spaces?	Various MPU recommendations intend to preserve and enhance the visual environment. Considering this and the relative small scale and low profile of the recreational amenities, park furniture, and parking areas identified in the MPU, implementation of the Plans would not block views of public view corridors or create substantial view blockage to or from the Park or from the Scenic Highway State Route 52. Potential impacts to viewsheds, view corridors, and public viewing areas would be less than significant.	None required.	Less than significant	
Would implementation of the Plans and associated discretionary actions result in incompatibility with the surrounding development in terms of bulk, scale, materials, or style?	Subsequent projects contemplated by the MPU-Plans would not exceed the allowable height or bulk regulations as no large buildings or habitable structures would be implemented. Recreational amenities such as signs and picnic areas would be required to use similar materials as existing amenities, and would also adhere to the design guidelines within the MPU. No community identification symbols or landmarks would be affected by the MPU-Plans, nor would any recommendations starkly contrast with surrounding development or natural topography. Impacts would be less than significant.	None required.	Less than significant	
Would implementation of the Plans and associated	Exterior lighting that may be required by subsequent projects contemplated by the	None required.	Less than	

	Table ES-1 Summary of Environmental Impacts and Mitigation Measures			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation	
discretionary actions shed substantial light onto adjacent, light-sensitive property or land use, or would emit a substantial amount of ambient light into the nighttime sky?	MPU-Plans would be designed to comply with applicable regulations, including the City's Outdoor Lighting Regulations (LDC, Section 142.0740). The lighting would be required to have cut-off shields to direct light away from open space areas and sensitive species, and avoid impact on night sky glare. Impacts would be less than significant.		significant	
Air Quality Would implementation of the	Air Quality Plans	None required.	Less than	
Plans and associated discretionary actions result in an increased number of automobile trips which would/could potentially affect San Diego's ability to meet regional, state, and federal clean air standards?	Implementation of the MPU-Plans would not result in a conflict with or obstruct implementation of the applicable air quality plan, nor would it result in population growth or cause an increase in currently established population projections. The MPU-Plans would be consistent with the City's General Plan and Regional Air Quality Standards. Impacts would be less than significant.	Notice required.	significant	
	Long-Term Operational Emissions			
	The MPU Plans would not result in a change in long-term operational emissions and would not result in an air quality violation. Therefore, impacts related to long-term operational air emissions would be less than significant.			
Would implementation of the Plans and associated discretionary actions result in air emissions that would	Construction emissions would be less than the applicable thresholds for all criteria pollutants and would not result in an air quality violation. Therefore, impacts related to short-term	None required.	Less than significant	

	Table ES-1 Summary of Environmental Impacts and Mitigation Measures			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation	
substantially deteriorate ambient air quality, including the exposure to of sensitive receptors to substantial pollutant concentrations?	construction air emissions associated with subsequent projects implemented in accordance with the MPU Plans would be less than significant. Air emissions from construction operations			
	would be minimal and short-term. Impacts associated with exposure of sensitive receptors to diesel particulate matter would be less than significant.			
	Due to the low volume of traffic generated by the project, combined with the low traffic volumes at Barker Way, Mission Gorge Road, Mesa Road, and Father Junipero Serra Trail, carbon monoxide (CO) hotspots would not result from the project. Impacts associated with CO hotspots would be less than significant.			
	Odors generated from vehicles and/or equipment exhaust during construction would be temporary, localized, and occur at levels that would not affect people. Therefore, odor impacts from construction would be less than significant. There would be no odor impact associated with long-term project operation.			
	None of the subsequent projects contemplated by the MPU Plans would result in the construction of a stationary source of emissions. Impacts associated with stationary sources of air contaminants would be less than significant.			

	Table ES-1 Summary of Environmental Impacts and Mitigation Measures			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation	
Greenhouse Gas Emissions				
Would implementation of the Plans and associated discretionary actions generate greenhouse gas (GHG) emissions, either directly or indirectly, that may have a significant impact on the environment?	Implementation of the Plans would not result in substantial adverse effects related to the generation of GHG emissions, either directly or indirectly, that may have a significant effect on the environment. Additionally, implementation of the Plans would not result in a change in operational GHG emissions within the Park. Thus, impacts associated with GHG emissions would be less than significant.	None required.	Less than significant	
Would implementation of the Plans and associated discretionary actions conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of GHGs?	The MPU Plans would be consistent with the goals of Climate Action Plan and other applicable plans, policies, and regulations pertaining to the reduction of GHGs. Additionally, subsequent projects contemplated by the MPU Plans would not result in a change in operational GHG emissions and construction emissions would not result in a substantial adverse effect related to GHG emissions. Impacts would be less than significant.	None required.	Less than significant	

		Table ES-1	
Summary of Environmental Impacts and Mitigation Measures			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Biological Resources		<u>-</u>	
Would implementation of the Plans and associated discretionary actions result in a reduction in the number of any unique, rare, endangered, sensitive, or fully protected species of plants or animals?	Potential impacts to the following MSCP covered plant species would be significant (Impact BIO-1): Willowy monardella San Diego goldenstar Orcutt's brodiaea Variegated dudleya San Diego barrel cactus San Diego ambrosia Potential direct and indirect impacts to the following sensitive wildlife species would also be significant (Impacts BIO-2 and BIO-3): San Diego fairy shrimp Quino checkerspot butterfly Belding's orange-throated whiptail Southern Pacific pond turtle San Diego horned lizard Coastal California gnatcatcher Coastal cactus wren Cooper's hawk (nesting) Golden eagle (nesting and wintering) Least Bell's vireo Light-footed clapper rail Northern harrier (nesting) Peregrine falcon (nesting) Southern California rufous-crowned sparrow Southwestern willow flycatcher Western bluebird	MM-BIO-1: To reduce potentially significant impacts that would cause a reduction in the number of unique, rare, endangered, sensitive, or fully protected species of plants or animals, if present within the study area, subsequent MPU-projects that are proposed in any location in the Plan areas with the potential to support sensitive biological resources, whether the area is disturbed or not disturbed, undisturbed areas shall be analyzed in accordance with the CEQA Significance Thresholds, which require that site-specific biological resources surveys be conducted in accordance with City of San Diego Biology Guidelines (2012, 2018b). The locations of any sensitive plant species, including listed, rare, and narrow endemic species, as well as the potential for occurrence of any listed or rare wildlife species shall be recorded and presented in a biological resources report. Based on available habitat within the study area, focused presence/absence surveys shall be conducted in accordance with the Biology Guidelines and applicable resource agency survey protocols to determine the potential for impacts resulting from the future projects on these species. Engineering design specifications based on project-level grading and site plans shall be incorporated into the design of future projects to minimize or eliminate direct impacts on sensitive plant and wildlife species consistent with the NRMP, Federal Endangered Species Act (FESA), Migratory Bird Treaty Act (MBTA), Bald and Golden Eagle Protection Act, California Endangered Species Act, MSCP Subarea Plan, and Environmentally Sensitive Lands Regulations. Mitigation for Impacts to Sensitive Upland Habitats Subsequent projects implemented in accordance with the MPU Plans resulting in impacts to sensitive upland Tier I, II, IIIA, or IIIB habitats shall implement avoidance and minimization measures consistent with the City Biology Guidelines and MSCP Subarea Plan and provide suitable mitigation in accordance with the City's Biology	Less than significant

	Summary of Environme	Table ES-1 ental Impacts and Mitigation Measures	
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
	Southern mule deerMountain lion	Guidelines and MSCP Subarea Plan (see Table 5.5-8 of this PEIR). Future project-level grading and site plans shall incorporate project design features to minimize direct impacts on sensitive vegetation communities shown in Table 5.5-6 of this PEIR, consistent with federal, state, and City guidelines. Any required mitigation for impacts on sensitive vegetation communities shall be outlined in a conceptual mitigation plan following the outline provided in the City's Biology Guidelines.	
		Mitigation for impacts to sensitive vegetation communities shall be implemented at the time future development projects are proposed. Project-level analysis shall determine whether the impacts are within or outside of the MHPA. Any MHPA boundary adjustments shall be processed by the individual project applicants through the City and Wildlife Agencies during the early project planning stage.	
		Mitigation for impacts to sensitive upland habitats shall occur in accordance with the MSCP mitigation ratios as specified within the City's Biology Guidelines (City of San Diego 2012, 2018b). These mitigation ratios are based on tier level of the vegetation community, the location of the impact, and the location of the mitigation site(s). For example, impacts to lands inside of the MHPA and mitigated outside the MHPA would have the highest mitigation ratio whereas impacts to lands outside the MHPA and mitigated inside the MHPA would have the lowest mitigation ratio.	
		Mitigation for short-term Impacts to sensitive species from Project Construction (Impact BIO-4) would be addressed through implementation of MM-LU-1 and MM-BIO-2.	

		Table ES-1 al Impacts and Mitigation Measures	
Environmental Issue Would implementation of the Plans and associated discretionary actions result in interference with the	Results of Impact Analysis The NRMP includes numerous management actions specifically designed to improve wildlife movement corridors both within the Park and regionally. However, the MPU also	Mitigation MM-BIO-2: Mitigation for future projects to reduce potentially significant impacts that would interfere with the nesting, foraging, or movement of wildlife species within the study area, shall be identified in site-specific biological resources surveys prepared in	Impact Level After Mitigation Less than significant
nesting/foraging/movement of any resident or migratory fish or wildlife species?	envisions subsequent facility, recreation and trails projects. These subsequent projects have the potential to result in habitat modifications, which in turn may interfere with wildlife nesting, foraging, or movement within riparian habitats and upland habitats. Impacts would be significant (Impact BIO-4).	accordance with City of San Diego Biology Guidelines as further detailed in MM-BIO-1 during the discretionary review process. The biology report shall include results of protocol surveys and recommendations for additional measures to be implemented during construction-related activities; shall identify the limits of any identified local-scale wildlife corridors or habitat linkages and analyze potential impacts in relation to local fauna, and the effects of conversion of vegetation communities to minimize direct impacts on sensitive wildlife species and to provide for continued wildlife movement through the corridor.	
		Measures that shall be incorporated into project-level construction documents to minimize direct impacts on wildlife movement, nesting, or foraging activities shall be addressed in the biology report and shall include recommendations for preconstruction protocol surveys to be conducted during established breeding seasons, construction noise monitoring and implementation of any species-specific mitigation plans (such as a burrowing owl mitigation plan) in order to comply with the FESA, MBTA, Bald and Golden Eagle Protection Act, state Fish and Game Code, and/or the ESL Regulations.	

		Table ES-1	
	Summary of Environment	al Impacts and Mitigation Measures	
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Would implementation of the Plans and associated discretionary actions result in an impact to <u>a</u> sensitive habitat, including, but not limited to streamside vegetation, oak woodland, vernal pools, wetlands, coastal sage scrub, or chaparral?	The NRMP identifies numerous management actions for ecological guilds within the Park, including cliffs and rocky outcrops, East Elliott clay ridgelines, Tierrasanta clay ridges, riparian woodlands, and Artemisia-dominated coastal sage scrub. These actions aim to improve the viability of these habitats. However, subsequent projects implemented in accordance with the MPU would have the potential to impact Tier I, II, IIIA, and IIIB habitats, pursuant to MSCP. These impacts would be significant (Impact BIO-5).	MM-BIO-1 (above) would reduce this impact to less than significant.	Less than significant
Would implementation of the Plans and associated discretionary actions result in the introduction of invasive species of plants into the area?	Invasive plants thrive in areas disturbed by activities such as grading, construction, trail usage, and fire. Therefore, as subsequent projects implemented in accordance with the MPU-Plans would involve trail construction, realignments and closures, there would be the potential to introduce non-native plant species within sensitive habitats. These impacts would be significant (Impact BIO-6).	MM-LU-1 (above) would reduce this impact to less than significant.	Less than significant
Would implementation of the Plans and associated discretionary actions result in an impact on City, state, or federally regulated wetlands (including, but not limited to, salt marsh, vernal pools, lagoon, riparian habitat, etc.) through direct removal, filling,	Subsequent projects implemented in accordance with the MPU-Plans would have the potential to impact vernal pools and their species, as well as jurisdictional wetlands. Impacts would be significant (Impacts BIO-7 and BIO-8).	MM-BIO-3: To reduce the potential direct impacts to City, state, and federally regulated wetlands, all subsequent projects developed in accordance with the MPU and NRMPPlans shall be required to comply with Clean Water Act (CWA) Section 404 requirements and special conditions, Regional Water Quality Control Board (RWQCB) in accordance with Section 401 of the CWA, California Department of Fish and Wildlife (CDFW) Section 1602 Streambed Alteration Agreement requirements and special conditions, and the City of San Diego ESL Regulations for minimizing impacts to wetlands.	Less than significant

	Summary of Environm	Table ES-1 ental Impacts and Mitigation Measures	
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
hydrological interruption, or other means?		Achieving consistency with these regulations for impacts on wetlands and special aquatic sites would reduce potential impacts to regulated wetlands and provide compensatory mitigation (as required) to ensure no net loss of wetland habitats.	
		Prior to obtaining discretionary permits for future actions implemented in accordance with the Plans, a site-specific biological resources survey shall be completed in accordance with City of San Diego Biology Guidelines. Any required mitigation for impacts shall be outlined in a conceptual wetland mitigation plan prepared in accordance with the City's Biology Guidelines (2012, 2018b). In addition, a preliminary or final jurisdictional wetlands delineation of the project site shall be completed following the methods outlined in the U.S. Army Corps of Engineers (USACE) 1987 Wetlands Delineation Manual and the 2008 Regional Supplement to the Corps of Engineers Delineation Manual for the Arid West Region. A determination of the presence/absence and boundaries of any waters of the U.S. and waters of the state shall also be completed following the appropriate USACE guidance documents for determining the Ordinary High Water Mark boundaries. The limits of any riparian habitats on-site under the sole jurisdiction of CDFW shall also be delineated, as well as any special aquatic sites (excluding vernal pools) that may not meet federal jurisdictional criteria but are regulated by the RWQCB. Engineering design specifications based on project-level grading and site plans shall be incorporated into the project design to minimize direct impacts to wetlands, jurisdictional waters, riparian habitats, vernal pools, etc. consistent with federal, state, and City guidelines.	
		Additionally, any impacts to wetlands in the City of San Diego would require a deviation from the ESL wetland regulations. Under the wetland deviation process, development proposals that have wetland impacts shall be considered only pursuant to one of three options: Essential Public Projects, Economic Viability Option, or	

	Summary of Environm	Table ES-1 ental Impacts and Mitigation Measures	
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		Biologically Superior Option. ESL Regulations require that impacts to wetlands be avoided. Unavoidable impacts to wetlands shall be minimized to the maximum extent practicable and mitigated as follows:	
		 As part of the project-specific environmental review pursuant to CEQA, all unavoidable wetland impacts shall be analyzed, and mitigation shall be required in accordance with ratios shown in Tables 5.5-9a and b of this PEIR. Mitigation shall be based on the impacted type of wetland and project design. Mitigation shall prevent any net loss of wetland functions and values of the impacted wetland. 	
		• For the Biologically Superior Option, the project and proposed mitigation shall include avoidance, minimization, and compensatory measures, which would result in a biologically superior net gain in overall function and values of (a) the type of wetland resource being impacted and/or (b) the biological resources to be conserved; and the biologically superior mitigation shall include either: (1) standard mitigation per Table 5.5-9a of this PEIR, including wetland creation or restoration of the same type of wetland resource that is being impacted that results in high quality wetlands; and a biologically superior project design whose avoided area(s) (i) is in a configuration or alignment that optimizes the potential long-term biological viability of the on-site sensitive biological resources, and/or (ii) conserves the rarest and highest quality on-site biological resources; or (2) for a project not considered consistent with "1" above, extraordinary mitigation per Table 5.5-9b of this PEIR is required.	
		As part of any future project-specific environmental review pursuant to CEQA, all unavoidable wetlands impacts (both temporary and permanent) shall be analyzed and mitigation required in accordance with the City's Biology Guidelines;	

	Summary of Environme	Table ES-1 ental Impacts and Mitigation Measures	
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		mitigation shall be based on the impacted type of wetland habitat. Mitigation shall prevent any net loss of wetland functions and values of the impacted wetland. The following provides operational definitions of the four types of activities that constitute wetland mitigation under the ESL Regulations:	
		 Wetland creation is an activity that results in the formation of new wetlands in an upland area. An example is excavation of uplands adjacent to existing wetlands and the establishment of native wetland vegetation. 	
		Wetland restoration is an activity that re-establishes the habitat functions of a former wetland. An example is the excavation of agricultural fill from historic wetlands and the reestablishment of native wetland vegetation.	
		 Wetland enhancement is an activity that improves the self- sustaining habitat functions of an existing wetland. An example is removal of exotic species from existing riparian habitat. 	
		 Wetland acquisition may be considered in combination with any of the three mitigation activities above. 	
		Wetland enhancement and wetland acquisition focus on the preservation or the improvement of existing wetland habitat and function and do not result in an increase in wetland area; therefore, a net loss of wetland may result. As such, acquisition and/or enhancement of existing wetlands shall be considered as partial mitigation only for any balance of the remaining mitigation requirement after restoration or creation if wetland acreage is provided at a minimum of a 1:1 ratio.	
		For permanent wetland impacts that are unavoidable and minimized to the maximum extent feasible, mitigation shall consist of creation of new in-kind habitat to the fullest extent possible and	

	Summary of Environme	Table ES-1 ental Impacts and Mitigation Measures	
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		at the appropriate ratios. If on-site mitigation is not feasible, then at least a portion of the mitigation must occur within the same watershed. The City's Biology Guidelines and MSCP Subarea Plan require that impacts on wetlands, including vernal pools, shall be avoided, and that a sufficient wetland buffer shall be maintained, as appropriate, to protect resource functions/values. The project specific biology report shall include an analysis of on-site wetlands (including City, state, and federal jurisdiction analysis) and, if present, include project alternatives that fully/substantially avoid wetland impacts. Detailed evidence supporting why there is no feasible less environmentally damaging location or alternative to avoid any impacts must be provided for City staff review, as well as a mitigation plan that specifically identifies how the project is to compensate for any unavoidable impacts. A conceptual wetland mitigation plan (which includes identification of the mitigation site) shall be approved by City staff prior to the release of the draft environmental document. Avoidance shall be the first requirement; mitigation shall only be used for impacts clearly demonstrated to be unavoidable.	
		Prior to the commencement of any construction-related activities on-site for projects impacting wetland habitat (including earthwork and fencing) the applicant shall provide evidence of the following to the Assistant Deputy Director/ED prior to any construction activity:	
		Compliance with USACE Section 404 nationwide permit;	
		 Compliance with the RWQCB Section 401 Water Quality Certification; and 	
		 Compliance with the CDFW Section 1601/1603 Streambed Alteration Agreement. 	
		Vernal Pools and Vernal Pool Species: Impacts to vernal pools shall require assessments of vernal pool flora and fauna, hydrology,	

	Summary of Environme	Table ES-1 ental Impacts and Mitigation Measures	
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		habitat function, and restoration potential and protocol fairy shrimp surveys, in addition to the requirements listed above. Impacts to fairy shrimp shall require either a Section 10(a)1(A) permit or Section 7 consultation Biological Opinion from USFWS. If the Vernal Pool Habitat Conservation Plan is adopted, the City will receive take authorization for the seven vernal pool species. On January 22, 2018, the San Diego City Council adopted the VPHCP, which provides a framework to protect, enhance, and restore vernal pool resources within the City's jurisdiction. The VPMMP was also adopted in conjunction with the VPHCP. In June 2018, the USFWS issued a Biological Opinion in accordance with Section 7 of the FESA regarding issuance of an ITP for implementation of the City's VPHCP pursuant to section 10(a)(1)(B) of the act. Subsequently on August 3, 2018, the USFWS made findings and recommendations for issuance of Section 10(a)(1)(B) Permit number TE-97791C to the City in accordance with the VPHCP, which will cover incidental take for two federally endangered animal species (San Diego fairy shrimp and Riverside fairy shrimp) along with five listed plant species. Mitigation for projects impacting vernal pools shall include salvage of sensitive species from vernal pools to be impacted, introduction of salvaged material into restored vernal pool habitat where appropriate (e.g., same pool series), and maintenance of salvaged material pending successful restoration of the vernal pools. Salvaged material shall not be introduced to existing vernal pools containing the same species outside the vernal pool series absent consultation with and endorsement by vernal pool series absent consultation with and endorsement by vernal pool series experts not associated with the project (e.g., independent expert). The mitigation sites shall include preservation of the entire watershed and a buffer based on functions and values; however, if such an analysis is not conducted, there shall be a default of a 100-foot buffer from the waters	

		Table ES-1	
	Summary of Environment	al Impacts and Mitigation Measures	
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Historical Resources			
Would implementation of the Plans and associated discretionary actions result in an alteration, including the adverse physical or aesthetic effects and/or destruction of a prehistoric or historic archaeological site or historic building (including an architecturally significant building), structure, object or site?	Impacts on known prehistoric or historic resources (both archaeological and built environment) and those not yet found and formally recorded could occur anywhere in association with implementation of the Plans. Grading of original in situ soils could also expose buried archaeological resources and features. Potential impacts on historical resources associated with subsequent projects implemented in accordance with the Plans would be considered significant (Impact HIST-1).	MM-HIST-1a: Prior to issuance of any development permit for a subsequent project tiering off of the MPU-Plans that could directly affect an archaeological or tribal cultural resource; the City shall require the following steps be taken to determine: (1) the presence of archaeological or tribal cultural resources and (2) the appropriate mitigation for any significant resources which may be impacted by a development activity. Sites may include, but are not limited to, privies, trash pits, building foundations, and industrial features representing the contributions of people from diverse socioeconomic and ethnic backgrounds. Resources may also include resources associated with prehistoric Native American activities. Initial Determination The environmental analyst shall determine the likelihood for the project site to contain historical resources by reviewing site photographs and existing historic information (e.g., Archaeological	Less than Significant
		Sensitivity Maps, the Archaeological Map Book, and the California Historical Resources Inventory System and the City's "Historical Inventory of Important Architects, Structures, and People in San Diego") and may conduct a site visit. An archaeological sensitivity map was created from the record search data as a management tool to aid in siting of future projects. There are three levels of sensitivity (see Figure 5.6-1). The levels are not part of any federal or state law. The levels are described below.	
		High Sensitivity: These areas contain known significant cultural resources and have a potential to yield information to address a number of research questions. These areas may have buried deposits, good stratigraphic integrity, and preserved surface and subsurface features. If a project were to impact these areas, a survey and testing program would be required to further define resource boundaries subsurface pressure or absence and determine level of	

Table ES-1 Summary of Environmental Impacts and Mitigation Measures			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Leve After Mitigation
		 significance. Mitigation measures such as ADRP and construction monitoring shall also be required. Medium Sensitivity: These areas contain recorded cultural resources or have a potential for resources to be encountered. The significance of the cultural resources within these areas is not known. If a project were to impact these areas, a survey and significance evaluation would be required if cultural resources were identified during the survey. Mitigation measures may also be required. Low Sensitivity: These areas have slopes greater than 25 degrees. Steep slopes have a low potential for archaeological deposits because they were not occupied by prehistoric peoples but rather used for gathering and other resource procurement activities. The majority of these activities do not leave an archaeological signature. If a project were to impact these areas, a survey would be needed to confirm the lack of cultural resources. Should cultural resources be identified, a significance evaluation would be required followed by mitigation measures. 	
		Review of this map should be done at the initial planning stage of a specific project to ensure that cultural resources are avoided and/or impacts are minimized in accordance with the Historical Resources Guidelines. If there is any evidence that the project area contains archaeological or tribal cultural resources, then an archaeological evaluation consistent with City Guidelines would be required. All individuals conducting any phase of the archaeological evaluation program must meet professional qualifications in accordance with the City's Historical Resources Guidelines. Step 1 Based on the results of the initial determination, if there is evidence that the project area contains archaeological resources, preparation	

		Table ES-1		
	Summary of Environmental Impacts and Mitigation Measures			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation	
		of an evaluation report is required. The evaluation report could generally include background research, field survey, archaeological testing, and analysis. Before actual field reconnaissance would occur, background research is required that includes a record search at the South Coastal Information Center at San Diego State University. A review of the Sacred Lands File maintained by the Native American Heritage Commission (NAHC) must also be conducted at this time. Information about existing archaeological collections should also be obtained from the San Diego Archaeological Center and any tribal repositories or museums. Once the background research is complete, a field reconnaissance must be conducted by individuals whose qualifications meet City standards. Consultants are encouraged to employ innovative survey techniques when conducting enhanced reconnaissance including, but not limited to, remote sensing, ground penetrating radar, human remains detection canines, LiDAR, and other soil resistivity techniques as determined on a case-by-case basis by the tribal representative during the project-specific AB 52 consultation process. Native American participation is required for field surveys when there is likelihood that the project site contains prehistoric archaeological resources or tribal cultural resources. If, through background research and field surveys, resources are identified, then an evaluation of significance, based on the City Guidelines,		
		must be performed by a qualified archaeologist. Step 2		
		Where a recorded archaeological site or Tribal Cultural Resource (as defined in the Public Resources Code) is identified, the City shall initiate consultation with identified California Indian tribes pursuant to the provisions in Public Resources Code Sections 21080.3.1 and 21080.3.2, in accordance with Assembly Bill 52 (AB 52). It should be noted that during the consultation process, tribal representative(s) will be involved in making recommendations		

	Table ES-1			
	Summary of Environm	ental Impacts and Mitigation Measures		
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation	
		regarding the significance of a tribal cultural resource which also could be a prehistoric archaeological site. A testing program may be recommended which requires reevaluation of the proposed project in consultation with the Native American representative, which could result in a combination of project redesign to avoid and/or preserve significant resources, as well as mitigation in the form of data recovery and monitoring (as recommended by the qualified archaeologist and Native American representative). The archaeological testing program, if required, shall include evaluating the horizontal and vertical dimensions of a site, the chronological placement, site function, artifact/ecofact density and variability, presence/absence of subsurface features, and research potential. A thorough discussion of testing methodologies including surface and subsurface investigations can be found in the City of San Diego's Historical Resources Guidelines. Results of the consultation process will determine the nature and extent of any additional archaeological evaluation or changes to the proposed project.		
		The results from the testing program will be evaluated against the Significance Thresholds found in the Guidelines. If significant historical resources are identified within the area of potential effects (APE), the site may be eligible for local designation. However, this process would not proceed until such time that the tribal consultation has been concluded and an agreement is reached (or not reached) regarding significance of the resource and appropriate mitigation measures are identified. The final testing report must be submitted to Historical Resources Board (HRB) staff for eligibility determination and possible designation. The final testing report and supporting documentation are used by HRB staff in consultation with qualified City staff with technical expertise in archaeology or cultural resources management to ensure that adequate information is available to demonstrate eligibility for designation under the applicable criteria. This		

	Summary of Environm	Table ES-1 ental Impacts and Mitigation Measures	
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		process is completed prior to distribution of a draft environmental document.	
		An agreement on the appropriate form of mitigation is required prior to distribution of a draft environmental document. If no significant resources are found and site conditions are such that there is no potential for further discoveries, then no further action is required. Resources found to be non-significant as a result of a survey and/or assessment will require no further work beyond documentation of the resources on the appropriate Department of Parks and Recreation site forms and inclusion of results in the survey and/or assessment report. If no significant resources are found, but results of the initial evaluation and testing phase indicates there is still a potential for resources to be present in portions of the property that could not be tested, then mitigation monitoring is required.	
		Preferred mitigation for archaeological resources is to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm shall be taken. For archaeological resources where preservation is not an option, a Research Design and Data Recovery Program is required, which includes a Collections Management Plan for review and approval. When tribal cultural resources are present and also cannot be avoided, appropriate and feasible mitigation will be determined through the tribal consultation process and incorporated into the overall data recovery program, where applicable, or project specific mitigation measures incorporated into the project. The data recovery program shall be based on a written research design and is subject to the provisions as outlined in CEQA Section 21083.2. The data recovery program must be reviewed and approved by the City's Environmental Analyst prior to distribution of a draft CEQA document and shall include	

	Table ES-1 Summary of Environmental Impacts and Mitigation Measures			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation	
	,	may be required during building demolition and/or construction grading when significant resources are known or suspected to be present on a site, but cannot be recovered prior to grading due to obstructions such as, but not limited to, existing development or dense vegetation.		
		A Native American observer must be retained for all subsurface investigations, including geotechnical testing and other ground disturbing activities whenever a tribal cultural resource or any archaeological site located on City property, or within the APE of a City project, would be impacted. In the event that human remains are encountered during data recovery and/or a monitoring program, the provisions of California Public Resources Code Section 5097 must be followed. In the event that human remains are discovered during project grading, work shall halt in that area and the procedures set forth in the California Public Resources Code (Section 5097.98) and State Health and Safety Code (Section 7050.5), and in the federal, state, and local regulations described above shall be undertaken. These provisions would be outlined in the Mitigation Monitoring and Reporting Program included in a subsequent project-specific environmental document. The Native American monitor shall be consulted during the preparation of the written report, at which time they may express concerns about the treatment of sensitive resources. If the Native American community requests participation of an observer for subsurface investigations on private property, the request shall be honored.		
		Step 4		
		Archaeological Resource Management reports shall be prepared by qualified professionals as determined by the criteria set forth in Appendix B of the Guidelines. The discipline shall be tailored to the resource under evaluation. In cases involving complex resources, such as traditional cultural properties, rural landscape districts, sites involving a combination of prehistoric and historic		

	Summary of Environm	Table ES-1 ental Impacts and Mitigation Measures	
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		archaeology, or historic districts, a team of experts will be necessary for a complete evaluation. Specific types of historical resource reports are required to document the methods (see Section III of the Guidelines) used to determine the presence or absence of historical resources; to identify the potential impacts from proposed development and evaluate the significance of any identified historical resources; to document the appropriate curation of archaeological collections (e.g. collected materials and the associated records); in the case of potentially significant impacts to historical resources, to recommend appropriate mitigation measures that would reduce the impacts to below a level of significance; and to document the results of mitigation and monitoring programs, if required.	
		Archaeological Resource Management reports shall be prepared in conformance with the California Office of Historic Preservation "Archaeological Resource Management Reports: Recommended Contents and Format" (see Appendix C of the Historical Resources Guidelines), which will be used by Environmental staff in the review of archaeological resource reports. Consultants must ensure that archaeological resource reports are prepared consistent with this checklist. This requirement will standardize the content and format of all archaeological technical reports submitted to the City. A confidential appendix must be submitted (under separate cover), along with historical resource reports for archaeological sites and tribal cultural resources, containing the confidential resource maps and records search information gathered during the background study. In addition, a Collections Management Plan shall be prepared for projects that result in a substantial collection of artifacts, which must address the management and research goals of the project, the types of materials to be collected and curated based on a sampling strategy that is acceptable to the City of San Diego. Appendix D (Historical Resources Report Form) may be used when no	

	Table ES-1 Summary of Environmental Impacts and Mitigation Measures			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation	
		archaeological resources were identified within the project boundaries.		
		Step 5		
		For Archaeological Resources: All cultural materials, including original maps, field notes, non- burial related artifacts, catalog information and final reports recovered during public and/or private development projects must be permanently curated with an appropriate institution, one which has the proper facilities and staffing for insuring research access to the collections consistent with state and federal standards unless otherwise determined during the tribal consultation process. In the event that a prehistoric and/or historical deposit is encountered during construction monitoring, a Collections Management Plan would be required in accordance with the project Mitigation Monitoring and Reporting Program. The disposition of human remains and burial- related artifacts that cannot be avoided or are inadvertently discovered is governed by state (i.e., Assembly Bill 2641 [Coto] and California Native American Graves and Repatriation Act of 2001 [Health and Safety Code 8010-8011]) and federal (i.e., federal Native American Graves and Repatriation Act [United States Code 3001-3013]) law, and must be treated in a dignified and culturally appropriate manner with respect for the deceased individual(s) and their descendants. Any human bones and associated grave goods of Native American origin shall be turned over to the appropriate Native American group for repatriation.		
		Arrangements for long-term curation of all recovered artifacts must be established between the applicant/property owner and the consultant prior to the initiation of the field reconnaissance. When		
		tribal cultural resources are present, or non-burial-related artifacts		
		associated with tribal cultural resources are suspected to be recovered, the treatment and disposition of such resources will be		
		determined during the tribal consultation process. This information		

	Table ES-1 Summary of Environmental Impacts and Mitigation Measures			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation	
		must then be included in the archaeological survey, testing, and/or data recovery report submitted to the City for review and approval. Curation must be accomplished in accordance with the California State Historic Resources Commission's Guidelines for the Curation of Archaeological Collections (dated May 7, 1993) and, if federal funding is involved, Title 36 of the Code of Federal Regulations Part 79. Additional information regarding curation is provided in Section II of the Historical Resources Guidelines.		
		MM-HIST-1b: Prior to issuance of any development permit for a subsequent project tiering off the Plans that could directly affect historic buildings, structures, districts, or objects, the City shall require the following steps be taken to determine: (1) the presence of built environment resources and (2) the appropriate mitigation for any significant resources which may be impacted by a development activity. The mitigation would be the same as of HIST-1a. The mitigation framework shall include an evaluation following the requirements in the Historical Resources Regulations and Guidelines as indicated below.		
		Prior to issuance of any permit that would directly or indirectly affect a building/structure in excess of 45 years of age, the City shall determine whether the affected building/structure meets any of the following criteria: (1) National Register-Listed or formally determined eligible, (2) California Register-Listed or formally determined eligible, (3) San Diego Register-Listed or formally determined eligible, or (4) meets the CEQA criteria for a historical resource. The evaluation of historic architectural resources would be based on criteria such as: age, location, context, association with an important person or event, uniqueness, or structural integrity as indicated in the Historical Resources Guidelines and Historic Resources Regulations (San Diego Municipal Code Sections 143.0201–143.0280).		

	Table ES-1 Summary of Environmental Impacts and Mitigation Measures			
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		Preferred mitigation for historic buildings or structures is to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm to the resource shall be taken. Depending upon project impacts, measures can include, but are not limited to, the following:		
		a. Preparing a historic resource management plan.		
		b. Designing new construction that is compatible in size, scale, materials, color, and workmanship to the historic resource (such additions, whether portions of existing buildings or additions to historic districts, shall be clearly distinguishable from historic fabric).		
		c. Repairing damage according to the Secretary of the Interior's Standards for Rehabilitation.		
		d. Screening incompatible new construction from view through the use of berms, walls, and landscaping in keeping with the historic period and character of the resource.		
		Specific types of historical resource reports are required to document the methods (see Section III of the Historical Resources Guidelines) used to determine the presence or absence of historical resources; to identify the potential impacts from proposed development and evaluate the significance of any identified historical resources. If potentially significant impacts to an identified historical resource are identified, these reports will also recommend appropriate mitigation to reduce the impacts to below a level of significance, where possible. If required, mitigation programs can also be included in the report.		

	Table ES-1 Summary of Environmental Impacts and Mitigation Measures			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation	
Would implementation of the Plans and associated discretionary actions adversely impact a prehistoric archaeological resource including religious or sacred sitesuses?	Impacts on known archaeological resources associated with religious or sacred uses, and those not yet found and formally recorded, could occur anywhere within the Park. Grading of original in situ soils could also expose buried archaeological resources and features including sacred sites. Potential impacts on archaeological religious or sacred uses associated with subsequent projects implemented in accordance with the Plans would be considered significant (Impact HIST-2).	MM-HIST-1a (see above) would reduce Impact HIST-2 to less than significant. MM-HIST-1a requires consultation with Native American tribes early in the development review process.	Less than Significant	
Would implementation of the Plans and associated discretionary actions adversely impact a prehistoric archaeological resource including human remains?	Impacts associated with the disturbance and/or discovery of human remains could occur anywhere within the Park. Grading of original in situ soils could also expose buried human remains. Potential impacts on human remains associated with subsequent projects implemented in accordance with the Plans would be significant (Impact HIST-3).	MM-HIST-1a (see above) would reduce Impact HIST-3 to less than significant. MM-HIST-1a requires compliance with regulations set forth in California Public Resources Code Section 5097.98 and State Health and Safety Code Section 7050.5 in the event that human remains are discovered.	Less than Significant	
Would implementation of the Plans and associated discretionary actions cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074?	Impacts on tribal cultural resources not yet found and formally recorded could occur anywhere within the Park. Grading of original in situ soils could also expose buried tribal cultural resources and features including sacred sites. Potential impacts on tribal cultural resources associated with subsequent projects implemented in accordance with the Plans would be considered significant (Impact HIST-4).	MM-HIST-1a (see above) would reduce Impact HIST-4 to less than significant. MM-HIST-1a requires tribal consultation in accordance with AB 52.	Less than Significant	

Table ES-1 Summary of Environmental Impacts and Mitigation Measures			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Human Health/Public Safety/H	azardous Materials		
Would implementation of the Plans and associated discretionary actions expose people or property to health hazards, including wildfire hazards?	MPU recommendations would generally serve to further educate Park users about wildfire risks within the Park and would not alter or significantly increase the potential exposure of recreational users of the Park. Other MPU recommendations contemplate subsequent projects, such as offices for Park rangers, shade structures, and picnic areas. These facilities would be subject to potential damage from wildfire. Therefore, impacts associated with the exposure of structures to wildfire hazards would be significant (Impact HAZ-1). Subsequent projects contemplated by the MPU-Plans would not interfere with emergency response plans, and evacuation routes within the Park would generally improve over time as these projects are implemented. Impacts related to emergency response and evacuation would be less than significant.	 MM-HAZ-1: Specific regulations associated with fire prevention are provided in Section 55.0101 (Adoption of the California Fire Code), Section 55.0901 (Fire Department Access and Water Supply), and Section 55.1001 (Fire Protection Systems and Equipment) of the Municipal Code. The Municipal Code provides fire safety regulations in Municipal Code Section 142.0412 (Brush Management Regulations). Individual projects implemented pursuant to the Master Plan would be required to demonstrate compliance with applicable fire codes and would be required to implement applicable Brush Management Regulations under Section 142.0412 of the Municipal Code. These regulations include the following: Brush management is required in all base zones on publicly or privately-owned premises that are within 100 feet of a structure and contain native or naturalized vegetation. Brush management activity is permitted within ESLs (except for wetlands) that are located within 100 feet of an existing structure in accordance with Section 143.0110(c)(7). Brush management in wetlands shall be requested with a development permit in accordance with Section 143.0110 where the Fire Chief deems brush management necessary in accordance with Section 142.0412(i). Where brush management in wetlands is deemed necessary by the Fire Chief, that brush management shall not qualify for an exemption under ESL Regulations, Section 143.0110(c)(7). Brush Management Zones. Where brush management is required, a comprehensive program shall be implemented that reduces fire hazards around structures by providing an effective fire break between all structures and contiguous 	Less than Significant

	Table ES-1 Summary of Environmental Impacts and Mitigation Measures			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation	
		consist of two distinct brush management areas called "Zone One" and "Zone Two."		
		Brush Management Zone 2 is the area between Zone 1 and any area of native or naturalized vegetation and typically consists of thinned, native or naturalized non-irrigated vegetation.		
		Brush management activities are prohibited within coastal sage scrub, maritime succulent scrub, and coastal sage-chaparral habitats from March 1 through August 15 (bird nesting season), except where documented to the satisfaction of the City Manager that the thinning would be consistent with conditions of species coverage described in the MSCP Subarea Plan.		
Would implementation of the Plans and associated discretionary actions create future risk of an explosion of or the release of a hazardous substance (including, but not limited to gas, oil, pesticides, chemicals, or radiation)? Would the Plans expose people or the environment to a significant hazard through the routine transport, use or disposal of hazardous materials?	Future projects implemented in accordance with the Plans would be subject to applicable federal, state, and local regulations related to the hazardous materials. Therefore, impacts would be less than significant.	None required.	Less than significant	
Would implementation of the Plans and associated discretionary actions be located on a site which is	The study area currently represents an ongoing hazard due to the potential presence of unexploded ordnance (UXO). As a result, subsequent projects contemplated	Formerly Used Defense Sites MM-HAZ-2: Prior to initiating subsequent projects contemplated by the Plans that could involve subsurface disturbance within the former Camp Elliott Formerly Used Defense Site (FUDS), the City	Less than significant	

	Table ES-1 Summary of Environmental Impacts and Mitigation Measures			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation	
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?	by the Plans could expose people to hazards associated with UXO. Impacts would be significant (Impact HAZ-2). Although no sites were identified through the regulatory database searches, there is a potential for unknown or buried hazardous substances to be encountered during ground-disturbing activities. Impacts would be significant (Impact HAZ-3).	shall verify that the USACE has completed subsurface UXO clearance of the entire site, or a Remedial Action Work Plan (RAWP) shall be prepared and implemented in accordance with requirements and procedures of the Department of Toxic Substances Control (DTSC), in consultation with the USACE. The RAWP, including a Health and Safety Plan, shall be prepared prior to grading or ground disturbance in accordance with requirements and procedures of the DTSC. The RAWP shall thoroughly describe investigations and disposal activities. The draft RAWP shall be reviewed and approved by City local enforcement agency staff and the DTSC, in consultation with the USACE. At a minimum, the RAWP shall include the following performance criteria: Prior to initiation of UXO clearance activities all Park personnel and adjacent property owners shall be notified. Implementation of the RAWP shall be performed by a qualified contractor. Access into the work sites shall be limited to the contractor personnel specifically authorized to enter the work site. Prior to initiation of detonation operations, all nonessential personnel shall be evacuated to a distance outside the fragmentation zone of the UXO to be detonated; radio communication shall be maintained between all concerned parties. Affected areas shall be accurred prior to authorizing detonation.		
		 Affected areas shall be secured prior to authorizing detonation of explosive charges. Signs shall be posted announcing 		

	Table ES-1 Summary of Environmental Impacts and Mitigation Measures			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation	
		blasting danger and guards shall be stationed at all likely pedestrian/recreational user entrances.		
		When a detonation-in-place is to occur, contractor personnel shall be posted in a 360-degree radius around the detonation site, at a safe distance.		
		 No disposal procedures shall be applied until the item has been positively identified. After the inspection has been completed, and providing there are no residual hazards, the UXO Senior Supervisor shall authorize the resumption of site operations. In the event that an UXO cannot be destroyed on- site, or if an unidentified UXO is located, the Safety Representative shall be notified for appropriate assistance. 		
		The RAWP shall detail the environmental investigations and define the procedures for disposing of UXO determined unsafe to move or handle (e.g., detonation-in-place disposal). Also to be included as part of the RAWP is an Explosive Safety Submission report that outlines the safety aspects associated with investigating and removing UXO. The potential for encountering UXO during the removal action poses a risk to on-site workers, nearby populations, and the environment. The Health and Safety Plan is an integral component of the RAWP and shall include safety precautions that all personnel must adhere to during implementation of the work plan. Violation of UXO-related safety precautions shall be grounds of dismissal.		
		The Health and Safety Plan shall also provide instructions for workers on standard work practices, hazard communication, identification, handling, removal, transportation, and detonation. These precautions may include, but are not limited to, the following:		
		 Prior to detonation of an UXO, sandbags filled with construction grade sand shall be utilized to tamp the 		

	Table ES-1 Summary of Environmental Impacts and Mitigation Measures			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation	
		detonation and minimize damage to nearby trees and shrubs. The preparation shall be thoroughly soaked with water and the immediate area watered well to minimize the possibility of secondary fires.		
		 Carry blasting caps in approved containers and keep them out of the direct rays of the sun. 		
		 Do not use explosives or accessory equipment that are obviously deteriorated or damaged. They may detonate prematurely or fail completely. 		
		 Disposal operations shall not be initiated until at least one- half hour after sunrise and shall be concluded by at least one- half hour prior to sunset. 		
		 Restrict and control access to the disposal site to a minimum of authorized personnel necessary for safe conduct of the disposal operations. 		
		 Do not carry fire- or spark-producing devices into a disposal site except as specifically authorized. 		
		The procedure for completing subsurface investigations and clearance is described below:		
		The project site shall be surveyed and marked out in 100-by- 100-square-foot grids.		
		 A Schonstedt detector shall be used to locate surface and subsurface anomalies. 		
		 Motor vehicles shall be restricted to existing, actively used roads, during normal operations. 		
		 Personnel shall drive as near as practical to the work site and walk into and out of the grid(s). 		
		 In the event of a medical or fire emergency, vehicles shall be utilized wherever necessary. 		

	Table ES-1 Summary of Environmental Impacts and Mitigation Measures			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation	
		Depending on the terrain at the project location, different sweep techniques shall be used. Varying sweep line intervals may be required. If the terrain is too steep to sweep safely, that portion of the grid not swept shall be mapped; and it would become the team leader's responsibility to devise the clearance method(s) suitable to the specific grid to assure complete clearance.		
		During the removal, all personnel shall receive highly specialized training. Personnel shall be briefed of safety regulations every day. Hazards of unexploded munitions shall be explained at each briefing, including other risks, such as those posed by rattlesnakes and poison oak, etc. Should UXO items be discovered during removal actions, proper procedures (as detailed in the RAWP) shall be followed to ensure safe disposal. For example, a metal containment system may be placed around the item and then detonated by remote control from a safe distance.		
		All UXO shall undergo an initial assessment to identify the ordnance. No disposal procedures shall be applied until the item has been positively identified. In the event that an UXO cannot be destroyed on-site, or if an unidentified UXO is located, a Safety Representative shall be notified for appropriate assistance in accordance with applicable regulations.		
		Other Hazardous Material Sites		
		MM-HAZ-3: Subsequent projects contemplated by the Plans that involve ground disturbance may occur in areas of known environmental concern. Such as leaking underground storage tank sites or other potentially contaminated sites. Regulations within the Municipal Code require that future projects shall demonstrate that the site is suitable for the proposed use. For sites with recorded hazardous material concerns, the City or project applicant shall obtain confirmation from the County Department of Environmental Health (DEH) that the site has been remediated to the extent		

	Table ES-1 Summary of Environmental Impacts and Mitigation Measures			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation	
		required for the proposed use. Clearance may be provided by County DEH when no hazardous materials are known, or expected to be present, or when remediation is required to be completed prior to clearance. Only upon receipt of DEH clearance would projects be recommended for approval.		
Hydrology and Water Quality				
Would implementation of the Plans and associated discretionary actions result in an increase in impervious surfaces and associated increased runoff ? Would the Plansor result in a substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes?	Subsequent projects contemplated by the MPUPlans, such as parking areas, would have the potential to increase the amount of impervious surfaces, which could result in additional runoff to a point that would change drainage patterns from the additional flow rate or volume. Therefore, impacts would be significant (Impact HYD/WQ-1).	 MM-HYD/WQ-1: Prior to approval of subsequent projects implemented in accordance with the MPU-Plans that involve impervious surfaces creation, the applicant shall demonstrate to the satisfaction of the City Engineer, that future projects are sited and designed to minimize impacts on absorption rates, drainage patterns, and surface runoff rates and floodwaters in accordance with current City and RWQCB regulations identified below. Future design of projects shall incorporate all applicable and practicable measures outlined below in accordance with the storm water construction requirements of the State Construction General Permit, Order No. 2009-00090DWQ, or subsequent order, and the Municipal Storm Water Permit, Order No. R9-2013-0001, or subsequent order, RWQCB, the City Storm Water Runoff and Drainage Regulations (Chapter 14, Article 2, Division 2 of the LDC), and the LDC, and shall be based on the recommendations of a detailed water quality and hydraulic analysis. The applicant shall also coordinate with the Storm Water Division when considering elements such as proposed roadway redesign, curbs and gutters, or additions to or modification of other storm water infrastructure, and to ensure that potential impacts to storm water infrastructure are addressed, including drainage facility capacity and operation and maintenance. a. San Diego RWQCB 	Less than Significant	

	Table ES-1 Summary of Environmental Impacts and Mitigation Measures			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation	
		development of a SWPPP if the disturbed soil area is one acre or more, or a Water Quality Control Plan if less than one acre, in accordance with the City's Storm Water Standards.		
		 If a future project includes in-water work, a Section 404 Permit (from USACE) and a Streambed Alteration Agreement (from CDFW) shall be required. 		
		 Comply with the San Diego RWQCB water quality objectives and bacteria Total Maximum Daily Load (TMDL) and Los Peñasquitos Lagoon Sediment TMDL. 		
		b. City of San Diego		
		To prevent flooding, subsequent projects implemented in accordance with the MPU Plans shall be designed to incorporate any applicable measures from the City of San Diego Land Development Code, ESL Regulations (Ch. 14, Art 03, Div. 01, Sec. 193143.0145 and 193143.0146). Flood control measures that shall be incorporated into future projects within a Special Flood Hazard Area (SFHA), or within a 100-year floodway, include but are not limited to the following:		
		 Prior to issuance of building permits or approval of any project within or in the vicinity of a floodway or SFHA, all proposed development within a SFHA is subject to the following requirements and all other applicable requirements and regulations of Federal Emergency Management Agency (FEMA) and those provided in Chapter 14, Article 3, Division 1 of the LDC. 		
		 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 		

	Summary of Environmer	Table ES-1 ntal Impacts and Mitigation Measures	
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		encroachments shall not result in any increase in flood levels during the occurrence of the base flood discharge except as allowed under Code of Federal Regulations Title 44, Chapter 1, Part 60.3(c) (13).	
		 If the engineering analysis shows that development will alter the floodway or floodplain boundaries of the SFHA, a Conditional Letter of Map Revision from FEMA shall be obtained. 	
		 Fill placed in the SFHA for the purpose of creating a building pad shall be compacted to 95 percent of the maximum density obtainable with the Standard Proctor Test Fill method issued by the American Society for Testing and Materials (ASTM). Granular fill slopes shall have adequate protection for a minimum flood water velocity of five feet per second. 	
		 Improvement plans shall note "Subject to Inundation" for all areas lower than the base elevation plus two feet. 	
		If structures will be elevated on fill such that the lowest adjacent grade is at or above the base flood elevation, a Letter of Map Revision based on Fill (LOMR-F) must be obtained prior to occupancy. The developer or applicant shall provide all documentation, engineering calculations, and fees required by FEMA to process and approve the LOMR-F.	
		In accordance with Chapter 14, Article 3, Division 1 of the LDC channelization or other substantial alteration of rivers or streams shall be limited to essential public service projects, flood control projects, or projects where the primary function is the improvement of fish and wildlife habitat. The channel shall be designed to ensure that the following occur:	
		Stream scour is minimized.Erosion protection is provided.	

	Table ES-1 Summary of Environmental Impacts and Mitigation Measures			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation	
		 Water flow velocities are maintained as specified by the City Engineer. 		
		 There are neither significant increases nor contributions to downstream bank erosion and sedimentation of sensitive biological resources; acceptable techniques to control stream sediment include planting riparian vegetation in and near the stream and detention or retention basins. 		
		 Wildlife habitat and corridors are maintained. 		
		 Groundwater recharge capability is maintained or improved. 		
		 Within the flood fringe of a SFHA or floodway, permanent structures and fill for permanent structures, roads, and other development are allowed only if the following conditions are met: 		
		 The development or fill shall not significantly adversely affect existing sensitive biological resources on-site or off- site. 		
		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 shall it cause adverse impacts related to flooding of properties located upstream or downstream, nor shall it increase or expand a FIRM Zone A.		
		 Grading and filling are limited to the minimum amount necessary to accommodate the proposed development, harm to the environmental values of the floodplain is minimized including peak flow storage capacity, and wetlands hydrology is maintained. 		

	Table ES-1 Summary of Environmental Impacts and Mitigation Measures			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation	
		 The development neither significantly increases nor contributes to downstream bank erosion and sedimentation nor causes an increase in flood flow velocities or volume. 		
		There shall be no significant adverse water quality impacts to downstream wetlands, lagoons, or other sensitive biological resources, and the development is in compliance with the requirements and regulations of the NPDES as implemented by the City of San Diego.		
Would implementation of the Plans and associated discretionary actions result inrequire modifications to the natural drainage system would be required for implementation of the Plans?	Subsequent projects contemplated by the MPUPlans, such as parking areas, would have the potential to adversely affect natural drainage patterns. Therefore, impacts would be significant (Impact HYD/WQ-2).	Implementation of MM-HYD/WQ-1 would reduce Impact HYD/WQ-2 to less than significant.	Less than significant	
Would implementation of the Plans and associated discretionary actions result in alterations to the course or flow of flood waters?	Subsequent projects implemented in accordance with the MPU-Plans would have the potential to impact FEMA-designated 100-year floodplains, the San Diego River, and other SFHAs within the study area. Because the drainage characteristics and the specific location of each subsequent project is dependent upon future project design, impacts associated with subsequent projects implemented in accordance with the MPU-Plans would be significant (Impact HYD/WQ-3).	Implementation of MM-HYD/WQ-1 would reduce Impact HYD/WQ-3 to less than significant.	Less than significant	
Would implementation of the Plans and associated discretionary actions create	Although various MPU recommendations generally intend to protect water quality, some subsequent projects to be	MM-HYD/WQ-2: Subsequent projects implemented in accordance with the <u>MPU-Plans</u> shall identify site-specific measures that reduce significant project-level water quality impacts to less than significant	Less than significant	

Table ES-1 Summary of Environmental Impacts and Mitigation Measures			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
discharges into surface or ground water, or result in increases in pollutant discharges including downstream sedimentation?	implemented in accordance with the MPU Plans would have the potential to result in water quality impacts. Because each subsequent project is dependent upon future project design, impacts would be significant (Impact HYD/WQ-4).	levels in accordance with the existing regulatory framework addressing drainage, storm water, and protection of water quality. Where mitigation is determined to be necessary and feasible, measures shall be included in an MMRP for the project. The following general measures would be implemented for future projects within the scope of the Plans. These measures would be updated, expanded, or refined when applied to specific future projects based on project-specific design and changes in existing conditions in order to demonstrate compliance with local, state, and federal laws in place at the time future projects are proposed. Future projects shall be sited and designed to minimize impacts on receiving waters, in particular the discharge of identified pollutants to an already impaired water body. Prior to approval of any entitlements for any future project, the City shall require measures to ensure that impacts to receiving waters are fully mitigated in accordance with the requirements of the City's Storm Water Runoff and Drainage Regulations (Chapter 14, Article 2, Division 2 of the LDC) and other appropriate agencies (e.g., RWQCB). To prevent erosion, siltation, and transport of urban pollutants, all future projects shall be designed to incorporate any applicable storm water improvement, both off- and on-site, in accordance with the City of San Diego Storm Water Standards Manual. The applicant shall also coordinate with the Storm Water Division when considering elements such as proposed roadway redesign, curbs and gutters, or additions to or modification of other storm water infrastructure, and to ensure that potential impacts to storm water infrastructure are addressed, including drainage facility capacity and operation and maintenance. Storm water improvements and water quality protection measures that shall be required for future projects include: Increasing on-site filtration;	

	Table ES-1 Summary of Environmental Impacts and Mitigation Measures			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation	
		 Preserving, restoring, or incorporating natural drainage systems into site design; 		
		 Directing concentrated flows away from MHPA and open space areas. If not possible, drainage shall be directed into sediment basins, grassy swales, or mechanical trapping devices prior to draining into the MHPA or open space areas; 		
		 Reducing the amount of impervious surfaces through selection of materials, site planning, and narrowing of street widths where possible; 		
		 Increasing the use of vegetation in drainage design; 		
		 Maintaining landscape design standards that minimize the use of pesticides and herbicides; and 		
		 To the extent practicable, avoiding development of areas particularly susceptible to erosion and sediment loss. 		
		San Diego RWQCB		
		 The requirements of the RWQCB for storm water quality are addressed by the City in accordance with the City NPDES requirements and the participation in the regional permit with the RWQCB. 		
		 Prior to permit approval, the City shall ensure any impacts on receiving waters are precluded or mitigated in accordance with the City of San Diego Storm Water Regulations 		
		 In accordance with the City of San Diego Storm Water Standards Manual, development shall be designed to incorporate on-site storm water improvements satisfactory to the City Engineer and shall be based on the adequacy of downstream storm water conveyance. 		

		Table ES-1 al Impacts and Mitigation Measures	
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
Geology and Soils Would implementation of the Plans and associated discretionary actions expose people or property to geologic hazards such as earthquakes, landslides, mudslides, liquefaction, ground failure, or similar hazards?	Subsequent projects implemented by the MPU-Plans have the potential to result in significant impacts related to geologic hazards. Future structures and improvements implemented in accordance with the MPU would have the potential to be subject to unstable conditions relating to seismicity (faults), liquefaction, landslides, and rockfall. The potential impacts associated with subsequent projects would be evaluated at a project level when detailed plans and grading quantities are known. Adherence to the San Diego Municipal Code and the California Building Code would reduce impacts related to geologic hazards to an acceptable level of risk, which is considered less than significant from a CEQA perspective. Therefore, impacts would be less than significant.	None required.	Less than significant
Would implementation of the Plans and associated discretionary actions increase the potential for erosion of soils on- or off-site?	Subsequent projects implemented in accordance with the MPU-Plans have the potential to result in significant impacts related to increasing the potential for on- or off-site erosion. Based on the steep slopes and highly erosive and poorly consolidated soils within portions of the study area, erosion would represent a potentially significant impact. Future projects implemented in accordance with the MPU-Plans would require site-specific evaluation to ensure erosion is minimized to the maximum	None required.	Less than significant

	Summary of Environments					
	Summary of Environments	al Impacts and Mitigation Measures	Summary of Environmental Impacts and Mitigation Measures			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation			
	extent practicable. Adherence to the San Diego Municipal Code, Grading Regulations, and NPDES permit requirements ensures impacts related to erosion would be less than significant. Therefore, impacts would be less than significant.					
Paleontological Resources Would implementation of the	Subsequent projects implemented in	None required.	Less than			
Plans and associated discretionary actions allow	accordance with the MPU Plans would have the potential to result in significant impacts	MM-PALEO-1: Prior to Project Approval:	Significant			
development to occur that could significantly impact a unique paleontological resource or a geologic formation possessing a moderate to high fossiloearing potential?	to paleontological resources if they exceed the excavation and depth thresholds of significance, or involve substantial grading within any of the formations with a moderate or high resource sensitivity rating. Therefore, impacts would be significant (Impact PALEO-1). However, subsequent to distribution of the Draft PEIR, an amendment was made to Chapter 14: General Regulations of the San Diego Municipal Code (SDMC) adding Section 142.0151 - Paleontological Resources Requirements for Grading Activities that applies to all projects which involve grading that could affect paleontological resources. Implementation of the General Grading Guidelines for Paleontological Resources, as required by the SDMC Section 142.0151, would ensure that impacts to Paleontological Resources would be less	 A. The environmental analyst shall complete a project-level analysis of potential impacts on paleontological resources. The analysis shall include a review of the applicable U.S. Geological Survey Quad maps to identify the underlying geologic formations, and shall determine if construction of a project would: Require over 1,000 cubic yards of excavation and/or a 10-foot, or greater, depth in a high resource potential geologic deposit/formation/rock unit. Require over 2,000 cubic yards of excavation and/or a 10-foot, or greater, depth in a moderate resource potential geologic deposit/formation/rock unit. Require construction within a known fossil location or fossil recovery site. Resource potential within a formation is based on the Paleontological Monitoring Determination Matrix (City of San Diego 2011a). If construction of a project would occur within a formation with a moderate to high resource potential, monitoring during 				

Table ES-1 Summary of Environmental Impacts and Mitigation Measures			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
	nesdies of impace, itialy sis	recovery site or a known fossil location. Monitoring may also be needed at shallower depths if fossil resources are present or likely to be present after review of source materials or consultation with an expert in fossil resources (e.g., the San Diego Natural History Museum). Monitoring may be required for shallow grading (less than 10 feet) when a site has previously been graded and/or unweathered geologic deposits/formations/rock units are present at the surface. Monitoring is not required when grading documented artificial fill. When it has been determined that a future project has the potential to impact a geologic formation with a high or moderate fossil sensitivity rating a paleontological MMRP shall be implemented during construction grading activities.	, week megadion
Transportation/Circulation	1	-	1
Would implementation of the Plans and associated discretionary actions result in an increase in projected traffic that is substantial in relation to the capacity of the circulation system?	Subsequent projects implemented in accordance with the MPU,Plans such as trails, park benches, and restrooms, would not attract a significant number of new visitors to the Park that would in turn result in a substantial increase in traffic. Other subsequent projects, such as the parking areas, would not result in a substantial increase in traffic in relation to the capacity of the existing circulation system because these parking areas would generally be traffic accommodating, rather than traffic generating. In addition, the estimated traffic volumes do not exceed established thresholds that generally trigger the need	None required.	Less than significant

Table ES-1 Summary of Environmental Impacts and Mitigation Measures			
Environmental Issue	Results of Impact Analysis for a further traffic analysis. Based on these factors, it is not anticipated that subsequent projects implemented in accordance with the MPU-Plans would result in a substantial increase in traffic in relation to the capacity of the existing circulation system. Impacts would be less than significant.	Mitigation	Impact Level After Mitigation
Would implementation of the Plans and associated discretionary actions create alterations to present circulation movements in the area including effects on existing public access points?	Subsequent projects implemented in accordance with the MPU-Plans could create alterations to present circulation movements due to the creation of new access points from area roads to provide for new off-street parking areas. As detailed plans for these subsequent projects are not available at this time, it cannot be guaranteed that they would be designed in a manner that would avoid significant circulation and access impacts. Therefore, impacts would be significant (Impact TRAF-1).	 MM-TRAF-1: Subsequent projects implemented in accordance with the MPU Plans that would have the potential to alter existing circulation or affect existing access points, including (but not necessarily limited to) MPU Facility Recommendations CM-F1, CM-F2, CM-F3, and MG-F6 shall be required to submit the necessary analysis, and design plans, and any other requirements pursuant to the discretion of the City's City Engineering standards. Measures that shall be considered required to the satisfaction of the City Engineer during subsequent project review to minimize potential impacts from pedestrian/bicyclist/vehicle conflicts, and to enhance circulation, include (but not necessarily limited to): Appropriate signage Review for adequate sight distance, preparation of sight distance studies, and mitigation, where needed Road striping, where needed Crosswalks, where needed Sidewalks/and-pathways for pedestrian access Bollards, where needed 	Less than significant
Would implementation of the Plans and associated discretionary actions impact the availability of parking?	As the recommended parking areas would improve accessibility to the Park by providing additional parking areas, these recommendations would have an overall	None required.	Less than significant

Table ES-1 Summary of Environmental Impacts and Mitigation Measures			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
	parking benefit. In addition, the parking areas would reduce current demand for parking on local residential streets. As a result, impacts related to parking would be less than significant.		
Would implementation of the Plans and associated discretionary actions conflict with the adopted policies, plans, or programs supporting alternative transportation modes (e.g., bus turnouts, trolley extensions, bicycle lanes, bicycle racks, etc.)?	Implementation of the MPU Plans would be consistent with existing policies supporting alternative transportation modes. Various MPU recommendations would support alternative modes of transportation and would not create a conflict with existing plans or policies. Therefore, impacts would be less than significant.	None required.	Less than significant
Public Services Would implementation of the Plans and associated discretionary actions promote growth patterns resulting in the need for and/or provision of new or physically altered public facilities, the construction of which could cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives?	Implementation of the Plans and associated discretionary actions would not result in an increase in population; therefore, no direct impact associated with the construction of public facilities would occur. Recreational amenities and trail improvements would be developed over time and would not likely attract a significant new amount of visitors due to any specific subsequent project. In addition, numerous MPU recommendations serve to reduce other potential indirect impacts. Therefore, indirect impacts related to new facilities for police services, fire protection services, and parks would be less than significant.	None required.	Less than significant

		Table ES-1	
Summary of Environmental Impacts and Mitigation Measures			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigatio
Public Utilities			
Would implementation of the Plans and associated discretionary actions result in the need for new utilities or require substantial alterations to existing utilities including water and wastewater infrastructure, electricity and gas transmission lines, storm water drainage systems, solid waste disposal facilities, or communication systems, the construction of which would create a physical effect on the environment?	Implementation of the Plans would not result in the need for new utilities or services or require alterations to existing utilities including water and wastewater infrastructure, electricity and gas transmission lines, solid waste, or communication systems. Subsequent projects implemented in accordance with the MPU-Plans would have the potential to be located near water/wastewater utilities. Grading activities during these subsequent projects, though rather limited, would have the potential to disrupt existing utilities. Therefore, impacts would be significant (Impact UTIL-1). Some subsequent projects identified by the MPU-Plans would have the potential to result in expanded storm water drainage facilities. These impacts would be significant (Impact UTIL-2).	MM-UTIL-1: Prior to approval of subsequent projects implemented in accordance with the MPUPIans, the City Director of the Public Utilities Department shall determine, based on review of the projectdetailed plans, that future projects are sited and designed to avoid conflicts with existing public utilities in accordance with the Master Plan and City of San Diego Public Utilities Department guidance identified below. Future design of projects shall be based on the recommendations of an anticipated detailed grade and alignment study that addresses potential conflicts with existing utilities and unpaved utility road realignments implemented in compliance accordance with Council Policies 400-13 and 400-14. The realignments of utilities or unpaved utility roads implemented in compliance with Council Policies 400-13 and 400-14 could result in secondary impacts on biological, or archaeological, or tribal cultural resources. The following measures shall be Measures that could be incorporated into future projects to minimize potential conflicts with utilities-shall include, but are not limited to, coordination regarding the location of the trails and pathways with the Park Planning Section of the Development Services Planning Department or the Director of the Public Utilities Department designee and in to determine compliance with the Sewer Design Guidelines and other utility agencies that require access to the facilities. If feasible, aAccess to the sewer facilities shall also be coordinated to provide combined access to storm water pollution facilities in order to minimize the impact on open space and canyons by having common access. The access shall be proposed in a strategic-location that will to-facilitate Council Policies 400-13 and 400-14. If future trail alignments shall be are coordinated with planned or existing unpaved utility roads then the following shall be considered required:	Less than Significant

Table ES-1 Summary of Environmental Impacts and Mitigation Measures			
Environmental Issue	Results of Impact Analysis	Mitigation	Impact Level After Mitigation
		 Areas within 10 feet of sewer mains shall be kept clear of trees. When feasible, IL ocate future access in accordance with the Sewer Design Guide requirement for unpaved utility roads. Design trails and pathways to also serve as an unpaved utility road for sewer centered over the ultimate sewer location if determined feasible at the project level. Where feasible, iIncorporate the sewer depth, slope, and location requirements of the Sewer Design Guide (February 2013). Any grade or alignment study shall include cross sections 	
		showing existing and proposed utilities and unpaved utility roads. Implementation of the mitigation framework outlined in MM-UTIL- 1, MM-LU-1, MM-BIO-1 and MM-BIO-2, MM-HIST-1a and MM-HIST-1b, MM-HAZ-1 and MM-HYD/WQ-1 and MM-HYD/WQ-2-above would reduce Impact UTIL-2 to below a level of significance because it would ensure that future projects implemented in accordance with the Plans would adhere to the regulatory requirements contained in the City's Storm Water Runoff and Drainage Regulations of the LDC and other applicable requirements.	



Chapter 1 Introduction

1.1 Project Scope

This Program Environmental Impact Report (PEIR) analyzes the potential environmental impacts of the adoption and implementation of the Master Plan Update (MPU), and Natural Resources Management Plan (NRMP), and Community Plan Technical Amendments (collectively, the Plans) prepared for Mission Trails Regional Park (MRTP or Park). The MPU and NRMP (collectively, the Plans have been developed as an integrated set of management guidelines for the Park, with the MPU focusing on public access and recreation and the NRMP focusing on the natural resources.

The Park provides visitors a way to explore the cultural, historical, and natural outdoor recreational aspects of San Diego. It is operated and maintained by the City of San Diego (City) in close partnership with the Mission Trails Regional Park Foundation (Foundation). The existing 5,830-acre Park is split into four areas: Lake Murray, Cowles Mountain, Mission Gorge, and Fortuna Mountain. The proposed MPU_Plans_would add two expansion areas to the Park—East Elliott and West Sycamore—that would bring the Park's total area to approximately 9,780 acres. All acreage needed for the West Sycamore expansion area has been transferred to the City; however, future planning and land acquisitions for the East Elliot area would be required in order to fully implement this area into the Park. All of these areas represent the study area for this PEIR.

This PEIR analyzes the broad environmental effects that are reasonably foreseeable if the Plans are implemented, while acknowledging that additional site-specific environmental review would be required for subsequent projects. Such projects recommended by the MPU-Plans include (but are not limited to) trail improvements, trailheads, picnic and shade areas, restrooms, interpretive overlooks, and additional parking in areas of the Park. Subsequent projects identified in the MPU-Plans are solely recommendations and are conceptual. The MPU-Plans does not provide for any specific location or design for subsequent projects that may potentially be implemented. The MPU-Plans also recommends additional parking in areas of the Park.

The NRMP provides adaptive management actions in order to protect sensitive biological resources. Some of these actions—such as monitoring, weeding, or revegetation—may have the potential to in turn cause environmental impacts. However, the NRMP also details minimization measures that would be required to be followed prior to implementation. Therefore, the NRMP would generally not result in environmental impacts, but is analyzed where necessary throughout the PEIR.

This PEIR also addresses the adoption and implementation of technical amendments to the Tierrasanta, Navajo, and East Elliott Community Plans, as well as the Rancho Encantada Precise Plan. These amendments are necessary to update or correct maps and community plan language required as part of project approval. The amendments would ensure that policy recommendations in the community plans with regards to the management of the Park are consistent with updated policies in the MPU and NRMPPlans. Collectively, the Plans and technical amendments represent the "Project" analyzed throughout this PEIR.

1.2 Environmental Process

1.2.1 Purpose, Legal Authority, and Intended Use of PEIR

Under the California Environmental Quality Act (CEQA) of 1970 (California Public Resources Code [PRC] Section 21000 et seq.), if a lead agency determines that there is substantial evidence in light of the whole record that a project may have a significant effect on the environment, the agency must prepare an EIR (CEQA Guidelines Section 15064(a)(1)).

The purpose of an EIR is to:

- Inform governmental decision-makers and the public about the potential significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, unavoidable 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; and
- Disclose to the public the reasons why a governmental agency approved a project in the manner the agency chooses if significant environmental effects are involved.

This document has been prepared in accordance with the guidelines for the preparation of EIRs issued by the City (December 2005) and the City's 2016 Significance Determination Thresholds, and complies with all criteria, standards, and procedures of CEQA and the CEQA Guidelines (California Administrative Code 15000 et seq.).

1.2.1.1 Lead Agency

The City is the Lead Agency for the Project pursuant to Article 4 (Sections 15050 and 15051) of the CEQA Guidelines. The Lead Agency, as defined by CEQA Guidelines Section 15367, is the public agency which has the principal responsibility for carrying out or approving a project. As Lead Agency,

the City's Development Services Department Environmental Analysis Section conducted an environmental review of the Project and determined that a PEIR was required. The analysis and findings in this document reflect the independent judgment of the City.

1.2.1.2 Responsible and Trustee Agencies

Implementation of the Project may require subsequent actions involving responsible and trustee agencies. Responsible agencies, as defined pursuant to CEQA Guidelines Section 15381, are public agencies that may have discretionary approval authority for a project, and include, but are not limited to, the County of San Diego, City of Santee, City of La Mesa, the United States Army Corps of Engineers (USACE), United States Fish and Wildlife Service (USFWS), California Department of Transportation (Caltrans), San Diego Air Pollution Control District (APCD), San Diego Regional Water Quality Control Board (RWQCB), San Diego State University (SDSU), the San Diego County Water Authority (SDCWA), and Marine Corps Air Station (MCAS) Miramar.

Trustee agencies are defined in Section 15386 of the CEQA Guidelines as state agencies that have jurisdiction by law over natural resources affected by a project that are held in trust for the people of the state of California, including the California Department of Fish and Wildlife (CDFW).

A brief description of some of the primary responsible or trustee agencies that may have an interest in the Project is provided below.

U.S. Army Corps of Engineers: USACE has jurisdiction over development in or affecting the navigable waters of the U.S., pursuant to two federal laws: The Rivers and Harbors Act of 1889 and the Clean Water Act, as amended. A "navigable water" is generally defined by a blue line as plotted on a United States Geological Survey (USGS) quadrangle map. Projects that include potential dredge or fill impacts to waters of the U.S. are subject to Section 404 of the Clean Water Act. Aggregate impacts to waters of the U.S. (defined as direct fill or indirect effects of fill) greater than one-half acre require a permit. All permits issued by the USACE are subject to consultation and/or review by the USFWS and the U.S. Environmental Protection Agency (EPA).

U.S. Fish and Wildlife Service: Acting under the Federal Endangered Species Act (FESA), the USFWS is responsible for ensuring that any action authorized, funded, or carried out by a federal agency (such as the USACE) is not likely to jeopardize the continued existence of listed species or modify their critical habitat. Accordingly, the USFWS would provide input to the USACE as part of the Section 404 process.

Within areas covered by the City of San Diego's Multiple Species Conservation Plan (MSCP) Subarea Plan, the role of the USFWS is limited with respect to species covered under the Subarea Plan. For species covered by the Subarea Plan, the USFWS has granted take authorization to the City for listed species in accordance with the requirements of the MSCP Implementing Agreement, executed between the City, the USFWS, and the CDFW in 1997. However, the City does not have "take" authority for any wetland species. In April 2010, the City relinquished coverage of seven vernal pool species under the City's ESA, Section 10 Incidental Take Permit (ITP). However, on January 22, 2018, in conjunction with certification of a Joint Program Environmental Impact Report (CEQA)/Environmental Impact Statement (NEPA), the San Diego City Council adopted the Vernal Pool Habitat Conservation Plan (VPHCP), which provides a framework to protect, enhance, and restore vernal pool resources within the City's jurisdiction. The Vernal Pool Management and Monitoring Plan (VPMMP) was also adopted in conjunction with the VPHCP. In June 2018, the USFWS issued a Biological Opinion in accordance with Section 7 of the FESA regarding issuance of an ITP for implementation of the City's VPHCP pursuant to Section 10(a)(1)(B) of the act. Subsequently on August 3, 2018, the USFWS made findings and recommendations for issuance of Section 10(a)(1)(B) Permit number TE-97791C to the City in accordance with the VPHCP, which will cover incidental take for two federally endangered animal species (San Diego fairy shrimp and Riverside fairy shrimp) along with five listed plant species. As such, Ffor future projects that are consistent with the City's MSCP and VPHCP, the City, therefore, has authority to grant permits for take of covered species and a separate permit is not required from the wildlife agencies. For listed species not included on the MSCP covered species list, the wildlife agencies retain permit authority. In addition, the USFWS, along with CDFW, must approve Multi-Habitat Planning Area (MHPA) boundary line adjustments.

California Department of Fish and Wildlife: CDFW has the authority to reach an agreement with an agency or private party proposing to alter the bed, banks, or floor of any watercourse/stream, pursuant to Section 1600 et seq. of the state Fish and Game Code. The CDFW generally evaluates information gathered during preparation of the environmental documentation, and attempts to satisfy their permit concerns in these documents. Where state listed threatened or endangered species not covered by the City's MSCP occur on a project site, the CDFW would be responsible for the issuance of a Memorandum of Understanding (MOU) to ensure the conservation, enhancement, protection, and restoration of state listed threatened or endangered species and their habitats. Along with the USFWS, the CDFW must approve any MHPA boundary line adjustments.

San Diego Regional Water Quality Control Board: The San Diego RWQCB regulates water quality through the Section 401 certification process and oversees the National Pollutant Discharge Elimination System (NPDES) Permit No. CA 0108758, which consists of wastewater discharge requirements.

California Department of Transportation: Caltrans is the state agency responsible for highway, bridge, and rail transportation planning, construction, and maintenance. The Park is adjacent to

Interstate 8 (I-8) and State Route 52 (SR-52). Caltrans approval would be required for any encroachments into Caltrans right-of-way by future projects.

Marine Corps Air Station Miramar: MCAS Miramar is located in between the East Elliott and West Sycamore areas. No trails or recreational facilities would be sited within lands controlled by MCAS Miramar. As instances of illegal trespass and encroachment have occurred, the City would continue to coordinate with MCAS Miramar to proactively deter trespassers.

County of San Diego: The County of San Diego Department of Parks and Recreation (DPR) jointly owns 1,400 acres and solely owns 122.4 acres of the Cowles Mountain area. Coordination between the City and County for the jointly owned area is detailed in Joint Powers Agreement O-18268. Adoption of the MPU and NRMP will require County of San Diego Board of Supervisors approval as it relates to the County's jurisdiction in accordance with Joint Powers Agreement O-18268. The County of San Diego Department of Environmental Health (DEH) regulates various public health and hazard issues in San Diego County, including on-site wastewater systems, recreational water, aboveground and underground storage tanks and cleanup, and medical and hazardous materials and waste. Coordination with the DEH would be required for projects located within recorded hazardous materials sites.

City of Santee: There are several existing secondary access points available from the City of Santee. Within the <u>1,540-acre</u> Cowles Mountain area, <u>189 acres are within the City of Santee municipal jurisdiction where</u> secondary access points within the <u>City of Santee</u> are located at Mesa Road, Rancho Fanita Drive, and Big Rock Road. Within the East Elliott area, West Hills Park provides a secondary access point. <u>MPU rRecommendations in the Plans</u> include various entry improvements, a parking and a linear bike skills area within the disturbed shoulder along Mesa Road near Big Rock Park, and family picnicking facilities near the Big Rock Park trailhead.

1.2.2 Program-Level Impact Analysis

This PEIR contains a program-level analysis of the project, pursuant to Section 15168 of the CEQA Guidelines, which states:

A PEIR may be prepared on a series of actions that can be characterized as one large project and are related either geographically; as logical parts in the chain of contemplated actions; in connection with the issuance of rules, regulations, plans, or other general criteria to govern the continuing program; or as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

The Plans are documents designed to provide recreational opportunities and manage natural resources, respectively. These Plans on their own accord would not directly result in a physical change in the environment. However, if the Plans are approved, future projects envisioned by the Plans would be subsequently implemented that were envisioned by the Plans. Therefore, it is reasonably foreseeable that the recommendations provided in the Plans would indirectly lead to physical changes in the environment. Consequently, this PEIR addresses potential impacts on the environment at the program level.

Potential future projects identified in the Plans are solely recommendations. The Plans do not provide for any specific location, design, or extent of grading for subsequent projects that may potentially be implemented. The MPU-Plans also provides recommendations for the general location of proposed or improved parking areas and proposed trails. Any details regarding location, design, or extent of grading associated with these facilities would be subject to review and approval by the City when a future project is proposed in accordance with the Plans. As a result, the PEIR does not evaluate project-level impacts associated with future implementation of any of the specific planning recommendations or public or private development projects proposed within the Park. Any subsequent projects proposed within the Park would be reviewed for consistency with the Plans and PEIR; project-level impacts of these subsequent activities would be subject to separate environmental review under CEQA.

A program-level analysis generally analyzes the broad environmental effects that are reasonably foreseeable if the Plans are implemented, while acknowledging that additional site-specific environmental review and document preparation will be required for subsequent projects. Where a project-level analysis has access to all the necessary construction information and is able to analyze the specific details of environmental effects of proposed elements, a program-level analysis often lacks details on specific development projects and may only be able to make general assumptions based on existing or proposed development regulations.

1.2.3 PEIR Review Process

The PEIR review process occurs in two basic stages. The first stage is the Draft PEIR, which offers the public the opportunity to comment on the document, while the second stage is the Final PEIR.

The Draft PEIR is distributed for review to the public and interested and affected agencies for a review period for the purpose of providing comments "on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated" (CEQA Guidelines Section 15204,). In accordance with CEQA Guidelines Sections 15085 and 15087 (a) (1), upon completion of the Draft PEIR a Notice of Completion is filed with the state Office of Planning and Research and Notice of Availability (NOA) of the Draft PEIR is issued in a newspaper of general circulation in the area.

Following the end of the public review period, the City will provide written responses to comments received on the Draft PEIR per CEQA Guidelines Section 15088 and will consider all comments in making its decision. Detailed responses to the comments received during public review, a Mitigation Monitoring and Reporting Program (MMRP), Findings of Fact, and a Statement of Overriding Considerations for impacts identified in the Draft PEIR as significant and unavoidable will be prepared and compiled as part of the PEIR finalization process. The Final PEIR will be made available for public review at least 14 days prior to the first public hearing in order to provide the public and those that commented on the Draft PEIR the opportunity to review the written responses to their comment letters. The culmination of this process is a public hearing where the City Council will determine whether to certify the Final PEIR, and adopt the MMRP, Findings of Fact, and Statement of Overriding Consideration as being complete and in accordance with CEQA.

1.3 PEIR Scope, Content, and Organization

The scope of analysis for this PEIR was determined by the City as a result of the public outreach process that began in 2011 and responses to the Notice of Preparation (NOP) dated April 2, 2014, which included a Scoping Letter that addressed the CEQA Initial Study Thresholds. The NOP, associated responses, and comments made during the scoping meeting on April 17, 2014 are included as Appendix A of this PEIR. Through these scoping activities, the project was determined to have the potential to result in the following significant environmental impacts:

- Land Use
- Visual Effects and Neighborhood Character
- Air Quality
- Greenhouse Gas Emissions
- Biological Resources
- Historical Resources
- Human Health, Public Safety, and Hazardous Materials
- Hydrology and Water Quality
- Geology and Soils
- Paleontological Resources
- Transportation/Circulation
- Public Services
- Public Utilities

The intent of the analysis section of this PEIR is to determine whether implementation of the Project would have a significant effect on the environment through analysis of the issues identified during the scoping process. A significant effect on the environment is defined as a "substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project" (CEQA Guidelines Section 15382).

The chapter organization and content of this PEIR, including a brief overview of the various sections of this PEIR, is provided below:

- **Executive Summary.** Provides a summary of the PEIR, a brief description of the project, identification of areas of controversy, and inclusion of a summary table identifying significant impacts, proposed mitigation measures, and impact rating after mitigation. A summary of the analyzed alternatives and comparison of the potential impacts of the alternatives with those of the Project is also provided.
- **Chapter 1, Introduction.** Contains an overview of the legal authority, purpose, and intended uses of the PEIR, as well as its scope and content. It also provides a discussion of the CEQA environmental review process, including public involvement.
- **Chapter 2, Environmental Setting.** Provides a description of the regional context, location, and existing physical characteristics and land use at the Park. Available public infrastructure and services, as well as relationship to relevant plans, is also provided in this section.

- **Chapter 3, Project Description.** Provides a detailed discussion of the Plans, including background, objectives, planning recommendations, and implementation mechanisms.
- **Chapter 4, History of Project Changes.** Describes the physical changes that have been made to the Plans in response to environmental concerns raised during review of the project.
- Chapter 5, Environmental Impact Analysis. Comprises the main body of the PEIR, analyzing impacts for each issue area. Under each issue area identified by the City during project scoping (previously detailed), the PEIR includes a detailed description of existing conditions, thresholds for determining significant issues, analysis of impacts associated with the project, and feasible mitigation framework. The analysis of impacts is based on the threshold issue statements identified in the NOP Scoping Letter (see Appendix A). If the analysis demonstrates that a potential effect would have a significant adverse impact on the physical conditions based on project implementation, a mitigation framework is provided to minimize or avoid the significant impact(s). Where a feasible mitigation framework is not available or proposed, the significant impact is identified as significant and unavoidable.
- Chapter 6, Significant Unavoidable Environmental Effects / Significant Irreversible Environmental Changes. Discusses any significant unavoidable impacts of the Project, which would remain significant and unavoidable even after project mitigation. This section also describes the potentially significant irreversible changes that may be expected with development under the Plans and addresses the use of nonrenewable resources during its construction and operational life.
- **Chapter 7, Growth Inducement.** Evaluates the potential influence the project may have on economic or population growth within the study area as well as the region, either directly or indirectly.
- **Chapter 8, Cumulative Impacts.** Identifies the impact of the Project in combination with other planned future development in the region.
- Chapter 9, Effects Found Not to Be Significant. Identifies all of the issues determined in the scoping process to be not significant, and briefly summarizes the basis for these determinations.
- Chapter 10, Alternatives. Includes a discussion of alternatives which could avoid or reduce
 potentially significant environmental impacts associated with implementation of the Project.
 Alternatives addressed in the EIR include a No Project Alternative and a Reduced Project
 Alternative. Pursuant to the CEQA Guidelines, the adopted 1985 Mission Trails Regional Park
 Master Plan represents the No Project Alternative. These alternatives provide the range of
 alternatives, which will enable the decision-makers to select any one of the alternatives or a
 hybrid of them.
- Chapter 11, References Cited. Lists all of the reference materials cited in the PEIR.

- Chapter 12, Individuals and Agencies Consulted. Identifies all of the individuals and agencies contacted during preparation of the PEIR.
- **Chapter 13, Certification Page.** Identifies all of the agencies, organizations, and individuals responsible for the preparation of the PEIR.

1.4 Availability of Draft PEIR

As previously detailed in the NOP, the draft PEIR will be circulated for a 45-day public review period. The NOA will be sent to all interested parties, including agencies, organizations, and individuals who commented on the NOP; as well as those who were in attendance and signed in at the NOP scoping meeting, which was held at the Park's Visitor Center on April 17, 2014.

A hard copy of the Draft PEIR will be available at the following locations for review:

- Mission Trails Visitor Center, 1 Father Junipero Serra Trail, San Diego, CA 92119
- Central Library, 330 Park Boulevard, San Diego, CA 92101
- San Carlos Library, 7265 Jackson Drive, San Diego, CA 92119
- Allied Gardens/Benjamin Library, 5188 Zion Avenue, San Diego, CA 92120
- Tierrasanta Library, 4985 La Cuenta Drive, San Diego, CA 92124

An electronic version of the PEIR will be available online at the City Clerk's website address: http://www.sandiego.gov/planning/.

1.5 Required Discretionary Actions

The Project will require City Council approval of the following discretionary actions:

- Adoption of the MPU and associated NRMPPlans.
- Adoption of amendments to the Tierrasanta, Navajo, and East Elliott Community Plans, and the Rancho Encantada Precise Plan.

Additionally, the Project will require County of San Diego Board of Supervisors approval for adoption of the MPU <u>and NRMP</u> as it relates to the County's jurisdiction in accordance with Joint Powers Agreement O-18268.

2

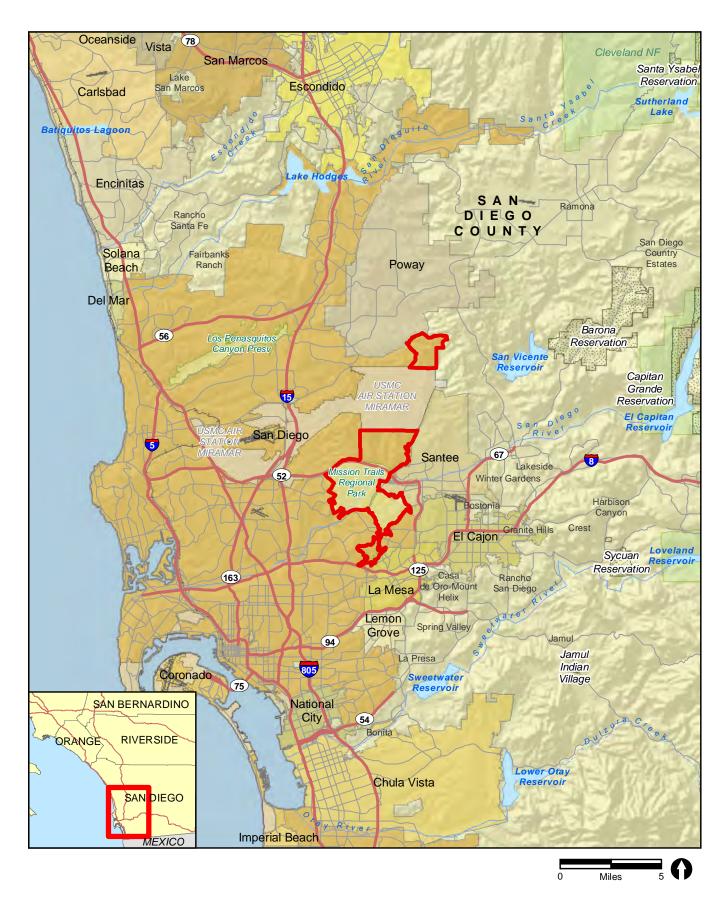
Chapter 2 Environmental Setting

2.1 Location

The Mission Trails Regional Park Park is located near the center of metropolitan San Diego, 8 miles northeast of Downtown San Diego, midway between the Pacific Ocean and the Cleveland National Forest (Figures 2-1 and 2-2). The Park is almost entirely within the City of San Diego (City); however, it is within or near several jurisdictions, including the Cities of La Mesa, Santee, and El Cajon to the east; the City of Poway to the north, and unincorporated San Diego County to the northeast. With the addition of the proposed expansion areas, the Park would be bisected by Marine Corps Air Station (MCAS) Miramar.

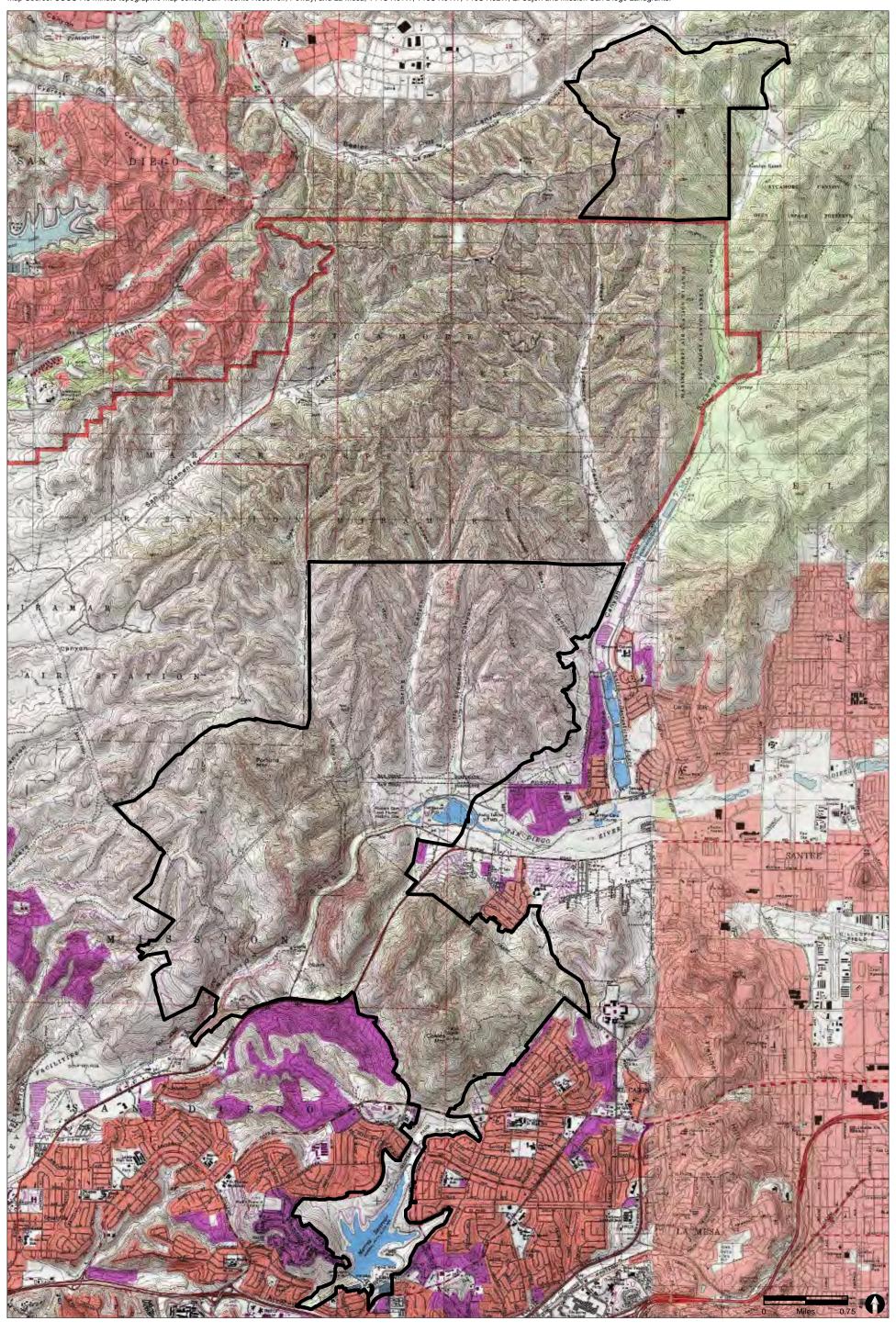
The study area is divided into six areas for planning purposes (Figure 2-3). Just north of Interstate 8, at the Park's southern end is Lake Murray, a 200-acre reservoir with active recreational uses. Immediately north lies Cowles Mountain, a regional landmark due to its visual prominence. To the northeast, the San Diego River cuts through Mission Gorge at right angles to the dominant landform, flowing west to Mission Bay. Further north is Fortuna Mountain, a prominent ridgeline flanked by a large valley and plateau to its west, and a complex of north-south canyons to its east.

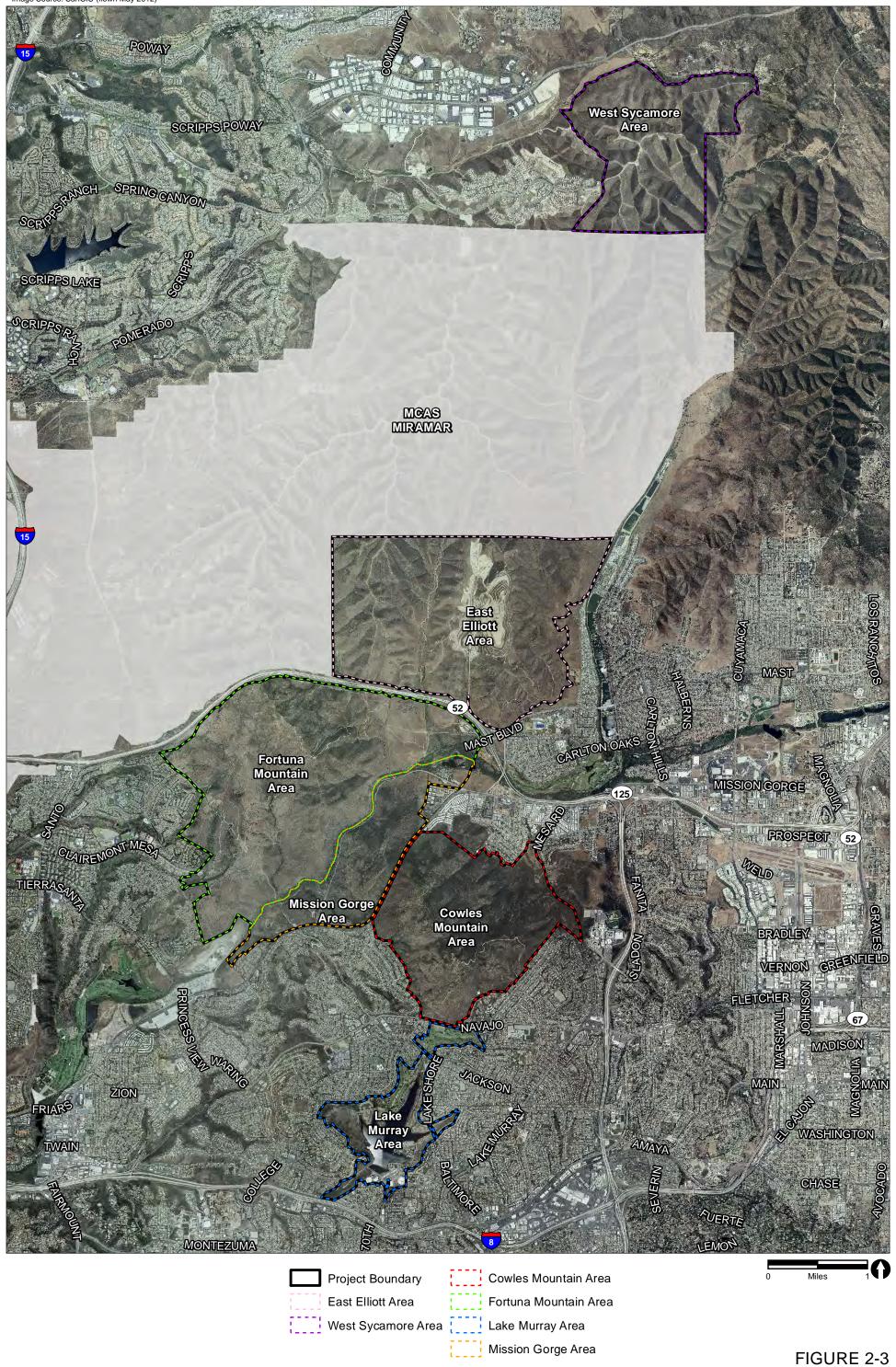
The East Elliott area (see Figure 2-3), lies north of SR-52, and is also composed of canyon complexes, along with the Sycamore Landfill. West Sycamore is undeveloped with sloping terrain and is adjacent to the County's Goodan Ranch and Sycamore Canyon Preserve. It is separated from the other areas by MCAS Miramar.



Project Location

FIGURE 2-1 Regional Location





2.2 Existing Physical Characteristics

The environmental setting of the study area is briefly described below. Chapter 5 of this Program Environmental Impact Report (PEIR) provides additional, more specific information relating to the Park's current environmental and regulatory setting pertaining to air quality, biological resources, historical resources, land use, transportation, visual character, geology/soils, hazards, hydrology/water quality, paleontological resources, public services and facilities, and public utilities.

2.2.1 Land Use

An overview of each area's size, ownership, park facilities, other uses (i.e., utilities), and recreational uses is provided below. For additional details regarding the land use history of the Park including the City and County of San Diego Joint Powers Agreement and prior County Board of Supervisors actions, refer to Section 2.0 of the MPU.

2.2.1.1 Lake Murray

At 628 acres, Lake Murray is the smallest area in the Park. It is completely within the jurisdiction of the City, within the Navajo Community Planning Area (CPA). The City owns about 73 percent of the land in fee. About 109 acres within the lake are privately held lands with flooding rights granted to the City. Park facilities include Lake Murray reservoir, Mission Trails Golf Course, Lake Murray Community Park, and open space lands immediately surrounding the reservoir (Figure 2-4). Other uses include the City's Alvarado Water Treatment Plant.

At the south end of the Park, Lake Murray provides a recreational day use area centered on Alvarado Point. The lake provides for recreational activities such as boating, fishing, and picnicking. Lake Murray Community Park includes major community-oriented ball fields, multi-use fields, concessions stand, a playground, and tennis courts. This area includes 7.998.14 miles of trails; 0.26 mile of this total is unauthorizedAll trails within this area are authorized. The paved maintenance road along the edge of the lake is heavily used by walkers, runners, cyclists, and in-line skaters. The unpaved utility roads that parallel the concrete urban runoff diversion channel surrounding the lake are also used by pedestrians and mountain bikers. Numerous unauthorized dirt trails split off the paved road to provide shoreline access.

2.2.1.2 Cowles Mountain

The 1,540-acre Cowles Mountain area is almost entirely within the municipal jurisdiction of the City of San Diego (1,355 acres), with 189 acres in the City of Santee municipal jurisdiction. As shown in Figure 2-5a, approximately 20 acres of land is in City ownership and 122 acres is in County ownership. The remaining 1,400 acres is jointly owned by both agencies.

Land within the City of San Diego is within the Navajo CPA, while land within the City of Santee is owned by the County of San Diego. Uses within this area include the antennae facilities at the top of Cowles Mountain, the associated service road, and the San Carlos Reservoir. Park facilities include the main staging area and trailhead at Golfcrest Drive and Navajo Road, and secondary trailheads at Big Rock/Mesa Road and Barker Way (Figure 2-5b).

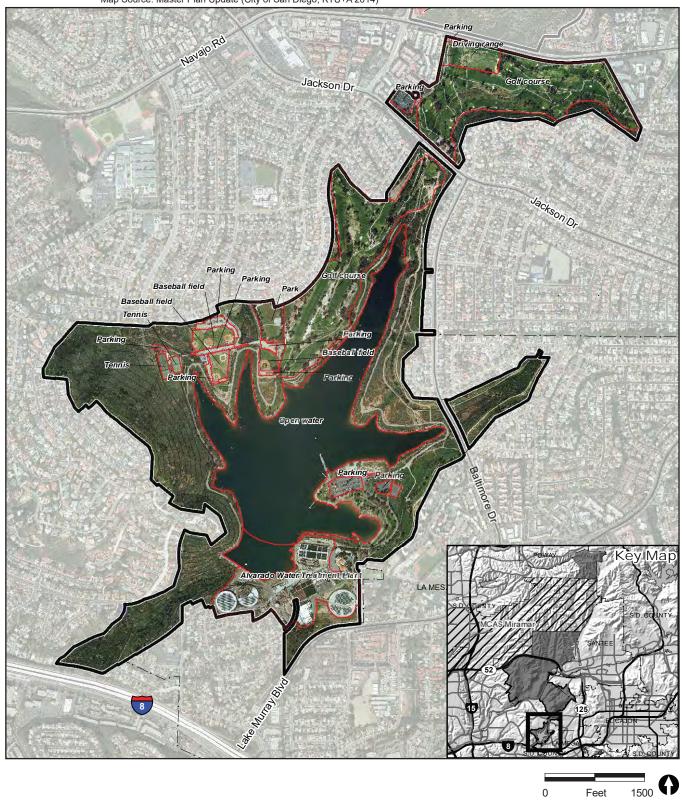
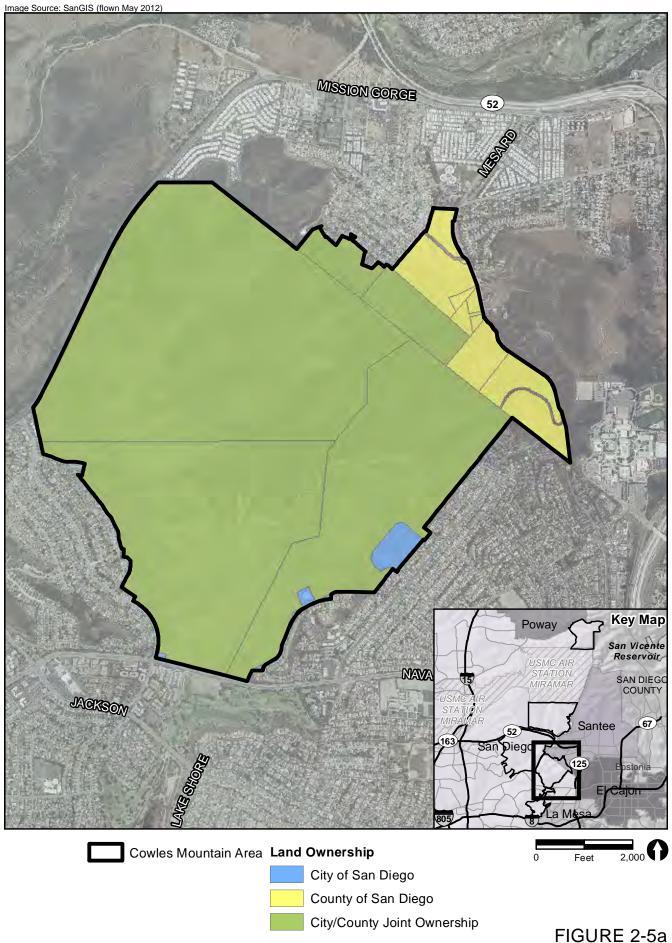




FIGURE 2-4
Park Facilities and Other Uses within Lake Murray Area



Map Source: Master Plan Update (City of San Diego, KTU+A 2014) Big Rock Park Trailhead Mesa Trailhead Interpretive restarea Barker W San Carlos Water Reservoir Parking Navajo Rd Golfcrest/Navajo Trailhead



FIGURE 2-5b
Park Facilities and Other Uses within Cowles Mountain Area

1500

Feet

Jackson Dr

This area is bounded by residential development on the east and west, and major transportation routes on the north and south. Navajo Road is the dividing boundary between the Lake Murray and Cowles Mountain areas, and Mission Gorge Road is the dividing boundary between this area and the Mission Gorge area.

Cowles Mountain's surface is characterized by rugged, relatively barren and exposed slopes, yet its canyons are secluded and relatively rich in plants and rock outcroppings. Use of the mountain is limited to recreational uses, such as hiking, mountain biking, photography, nature study, and viewing. Because of its panoramic views, it is the most frequented trail destination in the park. There are 14.3615.34 miles of trails in this area; 1.021.23 miles of this total are unauthorized.

2.2.1.3 Mission Gorge

The 864-acre Mission Gorge area encompasses over 2 miles of the San Diego River and includes the land between Mission Gorge Road and the river. The area is both entirely owned and within the jurisdiction of the City of San Diego; mainly within the Navajo CPA, with a small area in the northeast within the Tierrasanta CPA. Park facilities include the Visitor and Interpretive Center, Old Mission Dam, Kumeyaay Lake Campground, and Deerfield Quarry Bike Skills Site (Figure 2-6). The area is primarily bordered by the adjacent areas of Cowles and Fortuna Mountains, and also by residential uses on the northeast and southwest sides.

Regionally oriented park facilities characterize this area and include family and group picnic areas, park concessions, and an outdoor amphitheater. The northern end of this area balances day and overnight recreation with the need to protect cultural resource sites and wildlife habitats and corridors. Uses are carefully interfaced to maintain integrity to the area around Old Mission Dam while providing for interpretive and recreational access. The south end contains the Park's Visitor and Interpretive Center. West of the Visitor and Interpretive Center is the Park's only authorized bicycle skills area.

Other informal activities in this area include hiking, nature study, and mountain biking. The Mission Gorge area also provides the only currently authorized rock climbing area in the Park on the western face of Kwaay Paay. Father Junipero Trail, the San Diego River Trail, and the Climber's Loop Trail comprise a portion of the total 9.939.67 miles of trails in this area. All trails within this area are authorized.

2.2.1.4 Fortuna Mountain

At nearly 2,800 acres, the Fortuna Mountain area is the largest in the Park. It is completely within the jurisdiction of the City of San Diego and mainly within the Tierrasanta CPA, with only a small area in the southeast within the Navajo CPA. The City of San Diego owns 2,604 acres, the San Diego County Water Authority (SDCWA) owns approximately 22 acres, and San Diego State University (SDSU) owns approximately 174 acres. Uses within this area include SDCWA facilities and pipelines and multiple San Diego Gas & Electric (SDG&E) utility corridors (Figure 2-7). Park facilities also include the East Fortuna staging area, north of Kumeyaay Lake and east of Little Sycamore Creek. This staging area is being developed in phases and will eventually contain equestrian parking, corrals, a comfort station, park administration building, and other facilities.

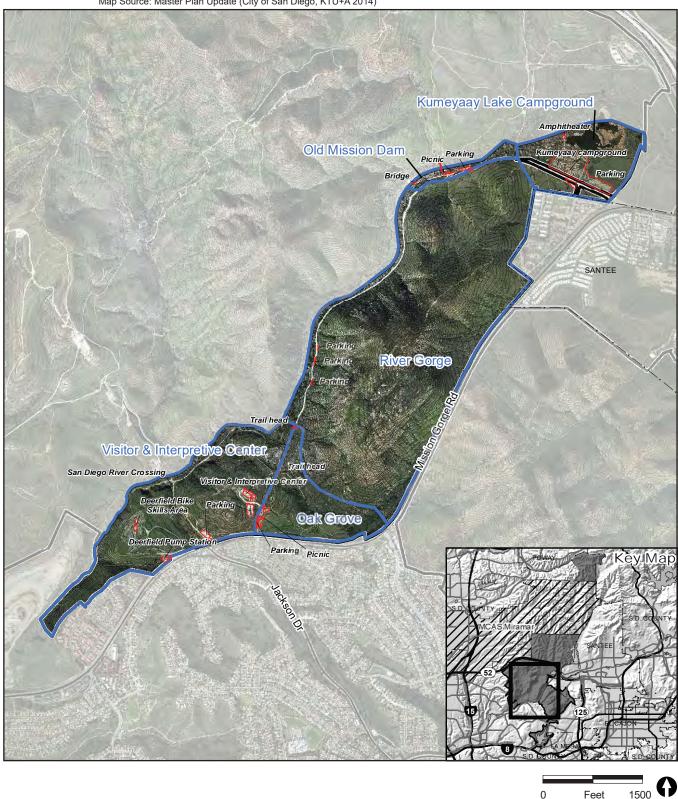




FIGURE 2-6

Park Facilities and Other Uses within Mission Gorge Area

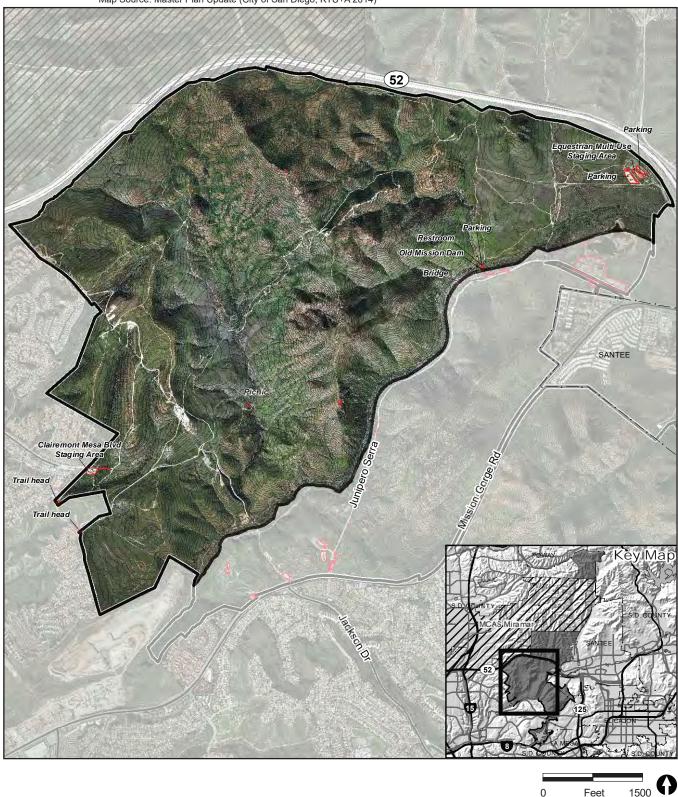




FIGURE 2-7

Park Facilities and Other Uses within Fortuna Mountain Area

The Fortuna Mountain area is bounded by residential uses within Tierrasanta on the west, the six-lane SR-52 on the north, and the Mission Gorge area on the south and east (with the San Diego River acting as the dividing boundary). The San Diego River, Suycott Wash, and steep slopes of North and South Fortuna peaks dominate the visual landscape.

The Fortuna Mountain area contains 29.4430.73 miles of hiking and mountain biking trails, representing the majority of the Park's overall trail system, with 0.150.36 mile being unauthorized. Nearly half of the trails utilize the access roads associated with SDCWA's aqueducts or SDG&E's transmission facilities. The Fortuna Mountain area has historically been the only area of the Park open to equestrian use on designated trails.

2.2.1.5 East Elliott

At approximately 2,590 acres, the East Elliott area is the second largest in the Park. It is completely within the jurisdiction of the City of San Diego and part of the East Elliott CPA. The City of San Diego has acquired approximately 730–739 acres (28–29 percent) of the area. Approximately 126 acres (5 percent) is owned by other public agencies. The remaining area is privately owned by Sycamore Landfill, Pardee Homes, and other individuals, who have development rights within land identified within the Multi-Habitat Planning Area (MHPA) per the Community Plan. There are no Park facilities within this area. Land uses within this area include the Sycamore Landfill and multiple SDG&E utility corridors. The vast majority is undeveloped land with moderate to steep slopes (Figure 2-8). The Castlerock project is an approved residential development at the eastern edge of this area that is under construction and has been annexed into the City of Santee. The Castlerock project includes MHPA lands to be deeded to the City of San Diego as part of the Park.

The East Elliott area is bounded by residential uses on the east within the City of Santee, the six-lane SR-52 on the south, and MCAS Miramar to the north and west. SR-52 acts as the boundary between the Fortuna Mountain and East Elliott areas of the Park.

Recreational use within the area has been occurring for a number of years on both unpaved utility roads and unauthorized user-created trails (22.25 miles). There are 22.28 miles of trails in this area; 7.50 miles of this total are unauthorized. The trails cross both publicly and privately- owned parcels, are not formally planned or designed, and have no legal access easements. Public trespass onto MCAS Miramar from this area currently occurs on a regular basis as users follow unpaved utility roads or unauthorized user-created trails that cross training-related safety zones, operational areas, and potential unexploded ordnance (UXO).

2.2.1.6 West Sycamore

This approximately 1,360-acre area is both completely within the jurisdiction and ownership of the City of San Diego, within the Rancho Encantada Precise Plan Area. The West Sycamore area was acquired through an Extraordinary Benefits Agreement between the City of San Diego and Sycamore Estates, which was approved by the City Council in 2001. The agreement obligated the developer to convey land to the City for the purposes of habitat conservation. A parking area and picnic area are the only park facilities within this area. Uses within this area include multiple SDG&E utility corridors, with a vast majority of the West Sycamore area being preserved within the City's MHPA, except for previously developed areas along the main ridgeline (Figure 2-9).

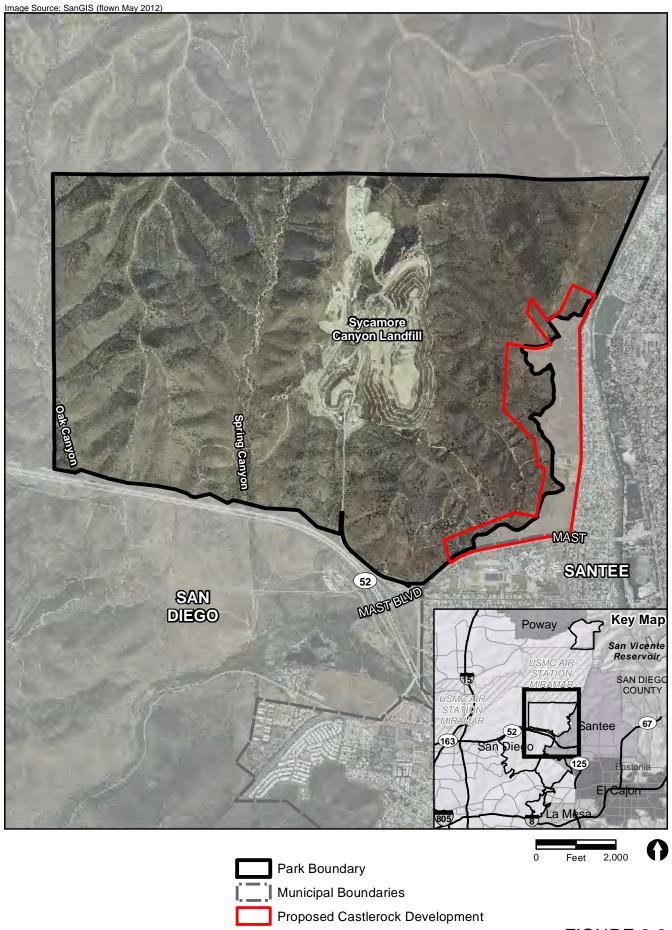


FIGURE 2-8

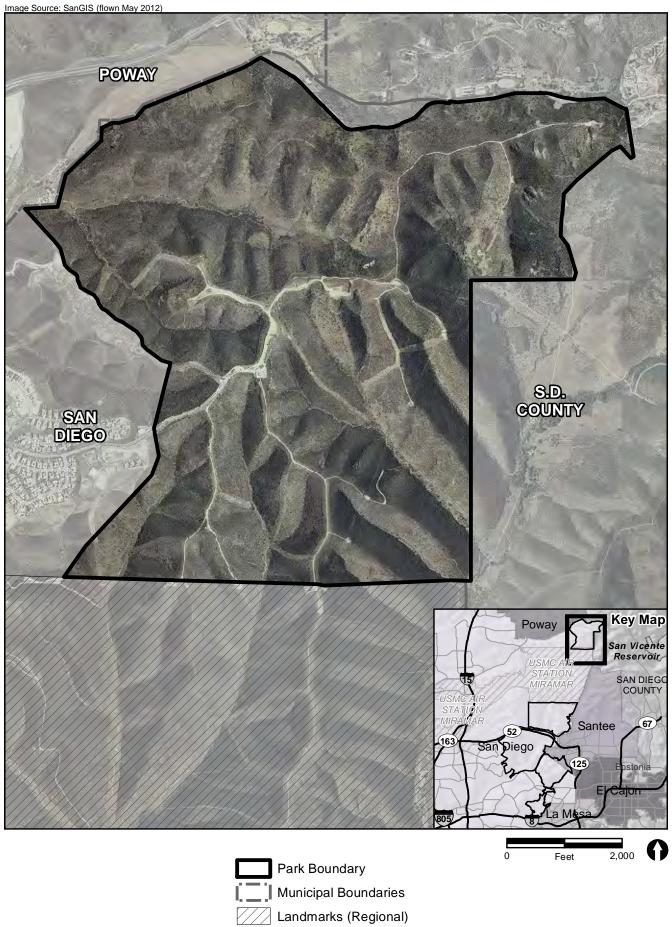


FIGURE 2-9

The West Sycamore area is bounded by residential uses on the west, the two-lane Sycamore Canyon Road on the north, Goodan Ranch Sycamore Canyon Preserve to the east, and MCAS Miramar to the south. The area is separated from the rest of the Park by about 3.5 miles spanning the breadth of MCAS Miramar. Except for the portion occupied by SDG&E transmission lines and associate access roads, most of the area is in a natural state. The area is characterized by a dominant ridgeline that separates the Peñasquitos Creek and San Diego River watersheds, and incised canyons with moderate to steep slopes.

There are approximately 65.84 miles of recreational trails within the West Sycamore area. All trails within this area are authorized. These trails primarily utilize narrowed utility access roads. Equestrian use is allowed on designated trails with access from the future facilities at the staging area at the end of Stonebridge Parkway, or from within the adjacent Goodan Ranch Sycamore Canyon Preserve via trail connections. Public trespass onto MCAS Miramar currently occurs on a regular basis from this area as users follow utility access roads or unauthorized user-created trails that cross training safety zones.

2.2.2 Park Entries and Circulation

There are a minimal number of Park entries and internal roads within the Park. Automobile circulation is limited to existing roads on the perimeter. Visitors utilize the extensive system of hiking, biking, and equestrian trails, many of which are collocated with utility access roads (Figure 2-10).

There are several regionally significant entries to the Park:

Lake Murray area: Kiowa Drive, Murray Park Drive

Cowles Mountain area: Golfcrest Drive, Big Rock Park

Mission Gorge area: Mission Gorge Road/Father Junipero Serra Trail, Father Junipero Serra

Trail/Bushy Hill Drive

Fortuna Mountain area: Mast Boulevard, Clairemont Mesa Boulevard

East Elliott area: No regional entries into the East Elliott area currently exist.

West Sycamore area: Stonebridge Parkway

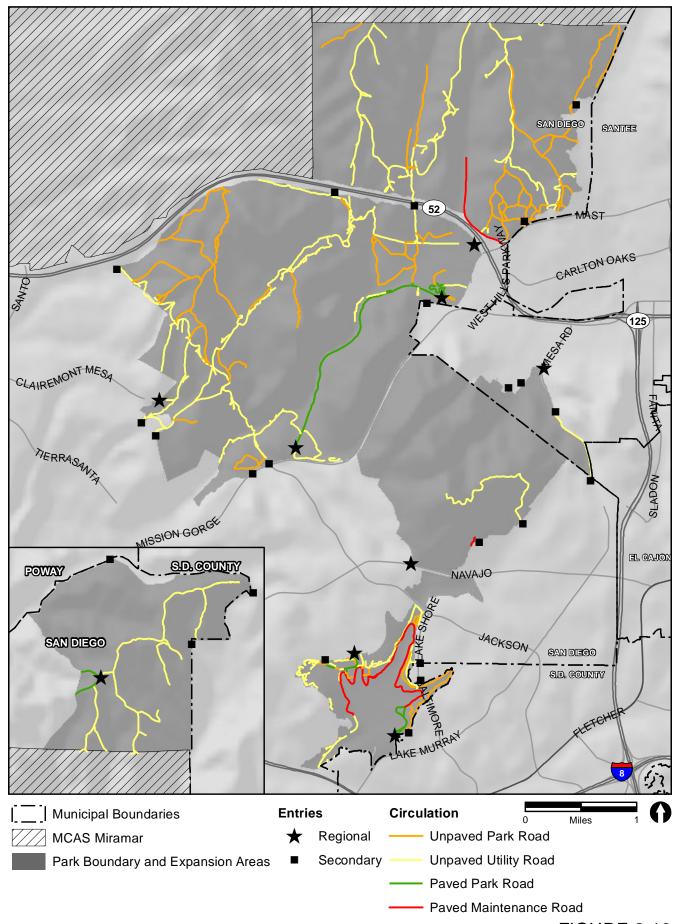


FIGURE 2-10

Secondary and community access points are not marked with the same prominent signage as the regional entries, nor do they provide as many improvements. Instead, they serve the local communities they occur within, and provide secondary access points into the Park which help distribute recreational usage throughout the Park:

Lake Murray area: Park Ridge Boulevard, Baltimore Drive, Sunset Park (La Mesa)

Cowles Mountain area: Barker Way, Lake Murray Boulevard, Mesa Road (Santee), Rancho Fanita Drive (Santee), Big Rock Road (Santee)

Mission Gorge area: Jackson Drive, Deerfield Pump Station, Simeon Drive

Fortuna Mountain area: Colina Dorada Drive, Calle De Vida, Corte Playa Catalina, Portobello Drive

East Elliott area: Oak Canyon, Spring Canyon, West Hills Park (Santee)

West Sycamore area: Goodan Ranch staging area, utility road from Goodan Ranch

About 85 miles of trails are considered to be part of the Park's official trail system (Figure 2-11). Of these, about 54 miles are designated for hiking and bicycle usage, with an additional 16 miles of hiking only trails. Paved multi-use paths total about 5 miles, and multi-use trails (i.e., equestrian usage) make up about 10 miles. Many recreational access points are also collocated with vehicular circulation and access points (Figure 2-12).

More than 63 miles of unpaved roads make up the majority of the Park roads, with nearly 41 miles being related to unpaved utility roads maintained by SDG&E and SDCWA. The remaining 23 miles of unpaved roads are Park roads used by rangers and emergency vehicles and include the Cowles Mountain service road; several roads within the Fortuna Mountain area; and a portion of roads within Spring Canyon.

2.2.3 Geology, Topography, and Soils

Geologically, the region of San Diego County in which the Park is located consists of a layer cake sequence of Cenozoic sedimentary rock units which preserve portions of the last 47 million years of Earth history. These Cenozoic sedimentary rocks overlie a deeply eroded terrain formed in significantly older crystalline basement rocks (e.g., metasediments, metavolcanics, granites) of the massive Peninsular Ranges Batholith. The oldest sedimentary rocks in the Park date from the Eocene Epoch and include the Friars Formation, Stadium Conglomerate, Mission Valley Formation, and Pomerado Conglomerate.

The Park contains a variety of topographic features, including canyons, valleys, mountains, hills, and low-lying areas. The topography is generally very rugged, with elevations ranging dramatically, from approximately 100 feet above mean sea level (AMSL) along the San Diego River to 1,593 feet AMSL at the summit of Cowles Mountain. A little more than 10 percent of the study area has slopes steeper than 50 percent.

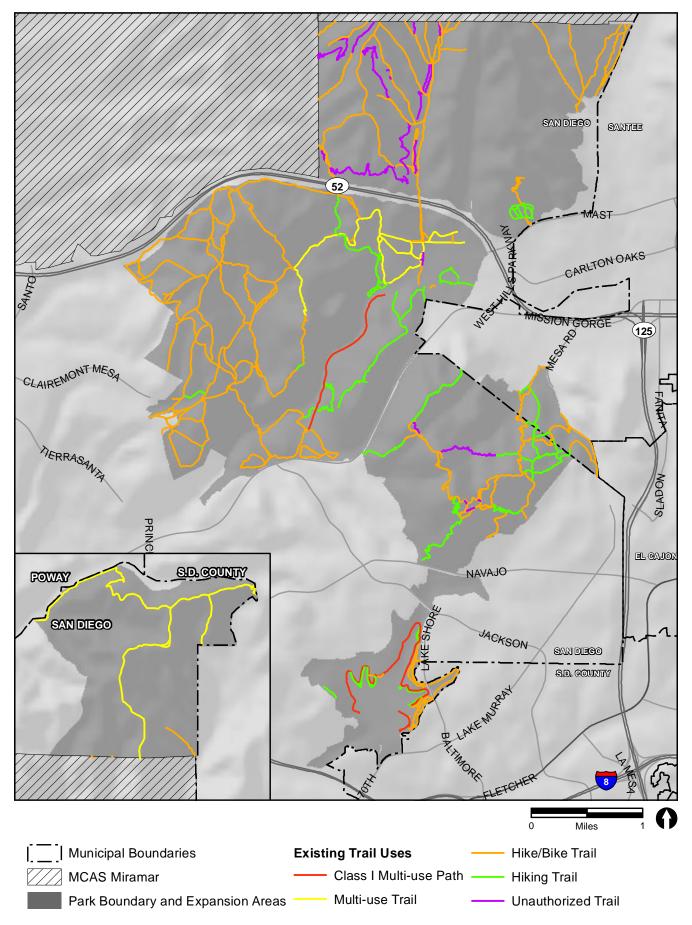
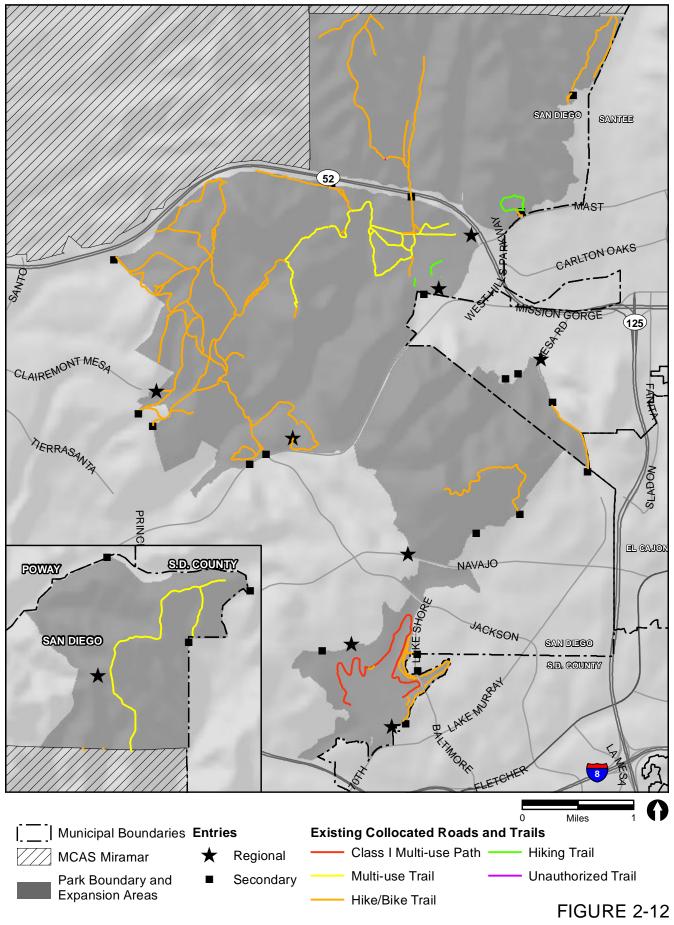


FIGURE 2-11



Collocated Vehicular Circulation and Recreational Access Points

The Mesozoic era geology within the Lake Murray, Cowles Mountain, Mission Gorge, and Fortuna Mountain areas has weathered into four primary soil series: acid igneous rock; metamorphic rock; Cieneba rocky coarse sandy loams; and Friant rocky fine sandy loam. The soils within the East Elliott and West Sycamore areas are uniformly Redding gravely loams, with only a few of the drainages showing any diversity. For additional details regarding the geology and soils within the Park, refer to Section 5.9 Geology and Soils. See Figures 5.9-1 and 5.9-2 for a depiction of the geologic formations and soil types found within the Park.

2.2.4 Historical Resources

The Park contains numerous historical resources, some of which are incorporated into interpretive/educational exhibits (the Old Mission Dam/Flume and Grinding Rocks). Others are protected via anonymity or inaccessibility. Prehistoric artifacts found within the Park include lithic, ceramic, and ground stone scatters; bedrock millings; and rock art. Historic Period artifacts include trash scatters, military debris, historic dirt roads, rock features, cisterns, mine shafts, and ranch complexes. For additional details regarding historical resources, refer to Section 5.6 of this PEIR.

2.2.5 Paleontological Resources

A paleontological records search conducted at the San Diego Natural History Museum identified 50 discrete fossil-collecting localities. The vast majority of the localities were discovered in the vicinity of the Park, but do not actually occur within the Park itself. Many of the fossil-collecting localities recorded from this region were discovered during monitoring of excavation activities associated with development activities. For additional details regarding paleontological resources, refer to Section 5.10 of this PEIR. See Figures 5.10-1a, 5.10-1b, and 5.10-2 for a depiction of the geologic formations and areas of paleontological sensitivities within the Park.

2.2.6 Biological Resources

The Park is a diverse biological area containing habitats of limited distribution, supporting endangered and threatened plant and animal species. It is also a regional core resource area with key linkages east and west along the San Diego River and direct connectivity to core resource areas to the northeast. A majority of the Park is within the MHPA (87 percent). Vegetation communities within the study area are primarily composed of Diegan coastal sage scrub (37.5 percent), chamise chaparral (21.9 percent), southern mixed chaparral (13.4 percent), non-native grassland (12.3 percent), developed lands (7.0 percent), and other vegetation communities (7.9 percent).

The Park contains a high diversity of plant species resulting from the multiple niches created by complex topography, soils, and its geographic location in coastal San Diego County. It currently supports a total of 244 plant species, representing 61 plant families. Of this total, 196 (80 percent) are native species, while 52 (20 percent) are introduced, non-native species.

The Park currently supports a diverse wildlife population, including at least 26 mammals, 101 birds, 17 reptiles and amphibians, and more than 600 invertebrate species. The diversity of animal species observed or expected to occur within the Park is typical of large, ecologically connected open space

areas within coastal San Diego County. For additional details regarding biological resources, refer to Section 5.5 of this PEIR and the Natural Resources Management Plan for Mission Trails Regional Park.

2.2.7 Hydrology

The Park is within two watersheds: San Diego River and Los Peñasquitos Creek. The majority of the Park is within the San Diego River watershed, which has its headwaters in the Cuyamaca Mountains near Julian and its terminus in San Diego near Mission Bay. Historically, the San Diego River flowed intermittently west of El Capitan and was characterized by periods of drought and extreme flooding events. Currently, with the addition of several dams and additional water inputs from urban runoff and treated wastewater, the San Diego River flows year-round and is less prone to flooding.

The Peñasquitos Creek watershed is relatively small and drains a mainly urbanized area of coastal San Diego. A portion of the Los Peñasquitos Creek watershed is contained within the northwest corner of the West Sycamore area of the Park. The watershed begins at its headwaters in Poway, just north of the Park, and flows through a series of military, open space, and urbanized canyons to empty into the Pacific Ocean at the Los Peñasquitos Lagoon. As with the San Diego River, Peñasquitos Creek originally flowed intermittently and is now considered to have perennial flows due to increased water flows from urbanization. For additional details regarding hydrology within the Park, refer to Section 5.8 of this PEIR. See Figure 5.8-1 for a depiction of the water and surface hydrology within the Park and surrounding area.

2.2.8 Air Quality/Climate

The Park is within the San Diego Air Basin (SDAB), about 12 miles east of the Pacific Ocean. The SDAB is characterized by a Mediterranean climate characterized by warm, dry summers and mild, wet winters. 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. For additional details regarding air quality and climate, refer to Section 5.3, Air Quality and Section 5.4, Greenhouse Gas Emissions of this PEIR.

2.3 Infrastructure and Public Services

2.3.1 Water and Wastewater

The SDCWA operates several pipelines and associated facilities that traverse five of the six areas of the Park: San Vicente Pipeline, Pipelines 3 and 4, Scripps Ranch Pipeline, and the Mission Trails Pipeline. The City of San Diego Public Utilities Department (PUD) operates and maintains several water pipelines and associated facilities in the Park, including the Murray First Pipeline, El Cajon Pipeline, College Ranch Feeder Pipeline, and the San Carlos Water Reservoir. They also operate the Alvarado Water Treatment Plant which can currently process up to 200 million gallons of water per day. The City of San Diego PUD operates and maintains major sewer facilities in the Park, including

the Lake Murray Trunk Sewer, the Mission Gorge Trunk Sewer, the East Mission Gorge Interceptor, and associated sewer mains. For additional details regarding water and wastewater facilities, refer to Section 5.13, Public Utilities.

2.3.2 Electrical Transmission and Generation

Several SDG&E electrical transmission lines traverse portions of the Park. The main transmission line that runs through the Park begins in the West Sycamore area, extending south to the Sycamore Substation, and southwest through the East Elliott and Fortuna Mountain areas to the East Elliott Substation along Tierrasanta Boulevard, outside of the Park boundaries. A smaller transmission line branches off the main transmission line; near the Sycamore Canyon Landfill this line runs east to the Carlton Hills Substation, which is also located outside of the Park's boundary.

2.3.3 Fire Protection Services

The Park is served by the San Diego Fire-Rescue Department (SDFD). The SDFD service area covers approximately 331 square miles and serves a population of approximately 1,337,000 people. SDFD has a total of 47 fire stations, employing 801 uniformed fire personnel. In addition to fighting fires, SDFD responds to medical emergency calls (over 80 percent of department calls are for medical aid), and SDFD's Fire Prevention Bureau conducts more than 20,000 annual inspections and issues fire code permits (alarms, hazardous materials, special events) while developing safety policies and guidelines for residents and businesses.

The SDFD strives to provide an average maximum initial response time of no more than 5 minutes. The SDFD also relies on Automatic Aid Agreements with its neighboring jurisdictions to ensure that the closest station would respond to an incident. The City of Santee Fire and Emergency Services Department supports SDFD and would be able to provide aid during incidents. Additional resources are available to the City through Mutual Aid Agreements with the county, state, and federal governments.

In 20142011, a fire services deployment planning study was completed (Citygate 20142011). The study analyzed the City's SDFD performance measures and deployment and staffing models and provides recommendations to improve City Fire-Rescue Department operations. The report included recommendations for revised deployment measures including use of a 5-minute travel time model that would achieve improved fire response coverage and service. The report also recommends fire unit deployment performance measures be implemented based on population density zones and aggregate population definitions (metropolitan, urban-suburban, rural, remote). In 2011, the San Diego City Council adopted the findings and recommendations of the Citygate report and established a five-year implementation plan to design and construct 19 fire stations. In an effort to update the findings of the 2011 study, the City retained Citygate to prepare a new study, City of San Diego – Fire-Rescue Standards of Response Cover Review, using the City's current network of 47 active fire stations and 70 primary response apparatus (Citygate 2017), and used a variety of new analytical tools to improve the accuracy of response time modeling, including counting for traffic congestion peak-hour call demand. For additional details regarding fire service, refer to Section 5.12, Public Services.

2.3.4 Police Protection Services

The goals of the San Diego Police Department (SDPD) are to reduce violent crime through prevention, and identify and apprehend criminal offenders; maintain priority call response times; and to ensure effective policing by addressing command and community priorities. The study area is served by the eastern and northeastern divisions of the SDPD. Within the study area, the eastern division serves the neighborhoods of Allied Gardens, Del Cerro, Grantville, Kearny Mesa, Lake Murray, and Tierrasanta; the northeastern division serves Scripps Ranch and Rancho Encantada.

The SDPD's goal for responding to emergency calls is 7 minutes. The SDPD staffing goal is to maintain 1.48 officers per 1,000 population ratio. A Law Enforcement Mutual Aid Plan permits SDPD's Chief of Police to order law enforcement mutual aid services from other jurisdictions (Municipal Code Section 22.0602). The San Diego County Sheriff's Department provides law enforcement services to the City of Santee with a substation that would be available to support the SDPD. For additional details regarding police service, refer to Section 5.12, Public Services.

2.3.5 Schools

While there are no schools located within the boundaries of the Park, the surrounding communities are served by schools within the San Diego Unified School District, Santee School District, and the Poway Unified School District. The Tierrasanta CPA is served by four elementary schools, one junior high school, and one high school. The Navajo CPA is served by ten elementary schools, two junior high schools, one high school, and three private schools. Grossmont Community College is located near the eastern boundary of the Cowles Mountain area, within the City of El Cajon. Within the East Elliott CPA, there are currently no schools as the area consists primarily of open space and a landfill. An elementary school within the Poway Unified School District is planned in the Sycamore Estates portion of the Rancho Encantada Precise Plan area, near the West Sycamore area. The Santee School District operates ten schools serving the communities east of the Park within the City of Santee. For additional details regarding schools, refer to Section 5.12, Public Services.

2.4 Planning Context

2.4.1 City of San Diego Municipal Code

The City of San Diego Municipal Code (Municipal Code) regulates zoning and land use categories throughout the City. It is intended to be the means by which the land use policies in the General Plan are implemented. The Municipal Code identifies the uses that are allowed on parcels within the City.

The Land Development Code (LDC) is one of the tools used to implement the General Plan and the various community plans, which establish land use throughout the City. The provisions addressing Site Development Permits, Historical Resources Regulations, and Environmentally Sensitive Lands (ESL) Regulations are applicable to the Project.

In addition, Chapter 13, Article 2, Division 12 of the LDC establishes the supplemental development regulations of the Mission Trails Design District Ordinance (MTDDO) and associated Design Manual.

These regulations ensure that development along the edges of the Park enhances the park's natural qualities and promotes the aesthetic and functional quality of park/urbanization relationships; however, the regulations do not apply to the West Sycamore expansion area because the land is 100 percent conserved and the MTDDO applies only to areas that have development potential.

Chapter 13, Article 2, Division 14 of the LDC establishes supplemental development regulations that are tailored to specific sites within the community plan areas in the City. In order to implement the San Diego River Park Master Plan, the San Diego River Park Subdistrict Community Plan Implementation Overlay Zone (CPIOZ-Type B) is applied to all properties within two subareas of the river, the River Corridor Area and the River Influence Area. The River Corridor Area comprised of the current 100-year floodway (floodway) as mapped by Federal Emergency Management Agency (FEMA) and the 35-foot-wide Path Corridor on each side of the floodway.

Within these areas designated as CPIOZ-Type B, no building, improvement, or portion thereof shall be erected, constructed, converted, altered, enlarged, or established until a discretionary permit is obtained. Applications for a CPIOZ-Type B discretionary permit shall meet the regulations of the underlying zone and the purpose and intent of the supplemental development regulations, and the San Diego River Park Master Plan. Supplemental development regulations applicable to the San Diego River Park Subdistrict are defined within the Navajo Community Plan and Land Development Code Section 143.0145 (Development Regulations for Special Flood Hazard Areas).

2.4.2 City of San Diego Community and Precise Plans

The City has multiple community plans within the study area, which act as "mini" general plans and are intended to provide policy recommendations regarding future development specific to each community. The Rancho Encantada Precise Plan is essentially equivalent to a community plan, as it serves as a detailed plan for development of the area. The three community plans (Navajo, Tierrasanta, and East Elliott) and the Rancho Encantada Precise Plan are directly influenced by the Park, and as a result, would need to be consistent with the Plans. Amendments are proposed to update or correct maps and community plan language needed as part of Project approval. The amendments would ensure that policy recommendations in the Community and Precise Plans with regards to the management of the Park are consistent with updated policies in the Plans.

2.4.3 Multiple Species Conservation Program

The City's Multiple Species Conservation Program (MSCP) Subarea Plan was adopted in 1997 in order to meet the requirements of the federal and state Endangered Species Acts and the California Natural Communities Conservation Planning Act. The MSCP is a comprehensive habitat conservation planning program that addresses multiple species habitat needs and the preservation of native vegetation communities in the San Diego region. A majority of the study area is within or immediately adjacent to the MHPA, which is the City's planned habitat preserve within the MSCP Subarea. Section 5.1, Land Use, further discusses the regulations of the MSCP and provides an analysis of the Project's consistency with these plans.



Chapter 3 Project Description

The Project analyzed in this Draft Program Environmental Impact Report—PEIR comprises the implementation of the Master Plan Update (MPU) and Natural Resources Management Plan (NRMP) (collectively, the—Plans for the Mission Trails Regional Park (Park), as well as several discretionary actions listed in Table 3-1. The proposed Plans and associated regulatory documents and actions form the "Project" for this PEIR—and are referred to throughout the PEIR as the Project. The project description contained within this section provides the basis for the environmental analysis in this PEIR for the Plans and associated discretionary actions.

Table 3-1		
<u>Discretionary Actions</u> Project Components		
Certification of the Program Environmental Impact Report		
Adoption of Mission Trails Regional Park Master Plan Update		
Adoption of Natural Resources Management Plan		
Adoption of Community Plan and Precise Plan Amendments:		
Navajo Community Plan		
Tierrasanta Community Plan		
East Elliott Community Plan		
Rancho Encantada Precise Plan		

The Plans have been developed as an integrated set of management guidelines for the Park, with the MPU focusing on public access and recreation, and the NRMP focusing on natural resources. The Plans were prepared concurrently in order to coordinate the recommendations and management actions for the six areas that comprise the study area—Lake Murray, Cowles Mountain, Mission Gorge, Fortuna Mountain, East Elliott, and West Sycamore. The East Elliott and West Sycamore areas would be park expansion areas.

The MPU provides updated recommendations to the 1985 Master Plan (Recommendations). The MPU recommendations range from broad overarching policy and management-related topics that

affect the entire Park, to specific physical improvements within the areas. The recommendations are focused on improving overall land/resource management, the safety and sustainability of recreational trails, improving recreational access, and eliminating conflicts between recreational uses and natural habitat.

The MPU identifies conceptual projects that may be implemented after adoption of the Plans. These are referred to as "subsequent projects" throughout the PEIR. Such projects recommended by the MPU include (but are not limited to) trail improvements, trailheads, picnic and shade areas, restrooms, parking areas, and interpretive overlooks. Subsequent projects identified in the MPU are conceptual, including trail alignments discussed below. Subsequent projects also include recommendations for the proposed location of improved and additional parking areas. The MPU does not provide for any specific location or design for subsequent projects that may potentially be implemented. These subsequent projects would require further design and review as they are proposed.

The NRMP sets forth adaptive management actions to ensure long-term, viable populations of sensitive species and habitats within the Park. It also sets forth protocols (e.g., data collection methods, success criteria) to evaluate the effectiveness of these management actions. The NRMP fulfills a requirement identified in the City of San Diego's (City's) Multiple Species Conservation Program (MSCP) Subarea Plan to set forth an adaptive management framework in order to protect sensitive biological resources at the Park.

Other NRMP management actions—such as monitoring, weeding, or restoration—may have the potential to in turn cause environmental impacts. However, the NRMP also details minimization measures that would be required to be followed prior to implementation. Therefore, the NRMP would generally not result in environmental impacts, but is analyzed where necessary throughout the PEIR.

The project also includes amendments to the Navajo, Tierrasanta, and East Elliott Community Plans, as well as to the Rancho Encantada Precise Plan. The amendments are required to update or correct maps and community plan language where the plans reference outdated information regarding the Park and the Master Plan. These amendments would ensure that the future facilities proposed under the MPU Plans are consistent with the respective Community Plans and/or Precise Plan and that any policy recommendations with regards to the management of the Park are consistent with updated policies in the Plans or simply make reference to the Plans.

3.1 Project Objectives

The Plans address the long-term protection of natural resources and development goals in support of recreation and interpretation within the Park. For the purposes of this PEIR, the goals of the Plans are the objectives of the Project as defined by the California Environmental Quality Act (CEQA) Guidelines:

1. Provide a structure for ongoing land and resource management actions required to maintain the Park and protect its resources.

- 2. Identify unsafe or unsustainable sections of recreational trails and provide guidance for the types of management action required.
- 3. Identify missing or constrained linkages within the Park and provide new or alternative routes to improve the recreational connectivity while protecting the Park's natural and cultural resources.
- 4. Integrate the management actions identified in the NRMP with the recreational trails network throughout the Park.
- 5. Provide amenities that support the recreational uses that currently exist or are proposed as part of the MPUPlans.

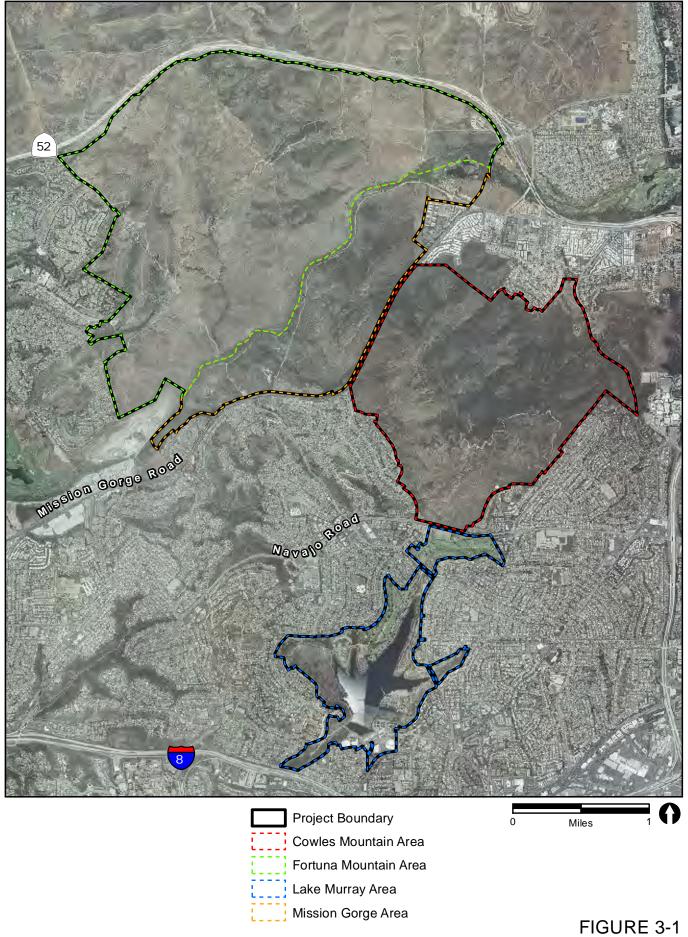
3.2 Project Components

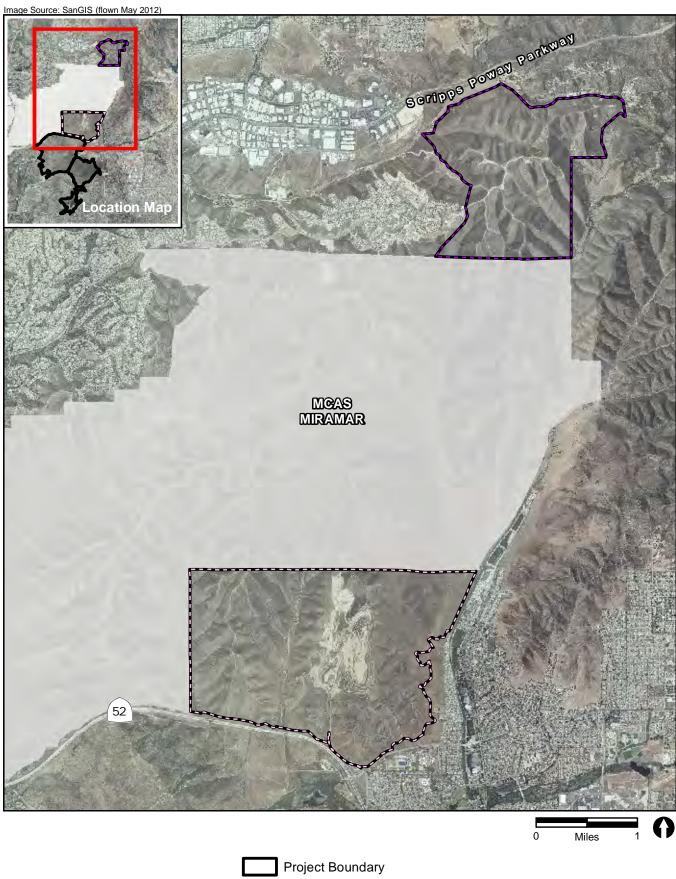
3.2.1 Planning Background

At approximately 5,830 acres, the Park as originally envisioned was one of the largest urban parks of its kind in the west. Although largely surrounded by residential development, the Park contains mountains, valleys, two lakes, a major river and scenic gorge, historical landmarks, wildlife habitats, and cultural resources. The origins of the Park go back to 1960, when the City prepared the report "Proposed Fortuna Mountain-Mission Gorge Metropolitan Park." This report identified a park of approximately 1,765 acres that included Mission Gorge, Old Mission Dam, and the entire Fortuna Mountain ridge. Through a cooperative City-County effort, Cowles Mountain was purchased in 1974, which linked the proposed regional park with Lake Murray. The City and County developed a "Park Complex" of these areas—Lake Murray, Cowles Mountain, Fortuna Mountain, and Mission Gorge (Figure 3-1)—which in turn led to the joint effort to prepare the Park's 1976 Master Development Plan (MDP).

The Park's Task Force was established in 1977 and currently is composed of representatives from the City, County, City of Santee, City of La Mesa, and a representative of the Citizens' Advisory Committee (CAC). The CAC was also formed in 1977 by the Task Force, which jointly renamed the park complex to "Mission Trails Regional Park." The CAC also reviewed and revised the 1976 MDP to its most recent iteration, the 1985 MDP. Some of the facilities and improvements identified in the 1985 MDP have been realized, including land acquisitions, creation of staging areas, Old Mission Dam improvements, and opening of the Visitor and Interpretive Center and Kumeyaay Lake Campground.

Since approval of the 1985 MDP, two expansion areas—the East Elliott and West Sycamore areas—have been identified for inclusion within the Park upon approval of the Project (Figure 3-2). The addition of these areas would bring the Park's total area to approximately 9,780 acres. The East Elliott area is north of State Route 52 (SR-52), between Marine Corps Air Station (MCAS) Miramar and the City of Santee, while West Sycamore is north of MCAS Miramar, west of Goodan Ranch, and south of Sycamore Canyon Road.





Project Boundary

East Elliott Area

West Sycamore Area

FIGURE 3-2
Proposed Expansion Areas

The vast majority of the East Elliott area has been designated as Multi-Habitat Planning Area (MHPA) as part of the City's MSCP Subarea Plan. It constitutes one of the largest and biologically most important remaining open space areas in the City, with a number of endangered and threatened wildlife species. All lands within the MHPA are required to conserve 75 percent of the parcel for habitat conservation purposes. Private property owners will continue to have development rights per the Community Plan, however, the City is actively pursuing the acquisition of land in this area and currently owns approximately 735 acres (approximately 29 percent). As land is acquired or dedicated in fee or by easement, it will become part of the Park.

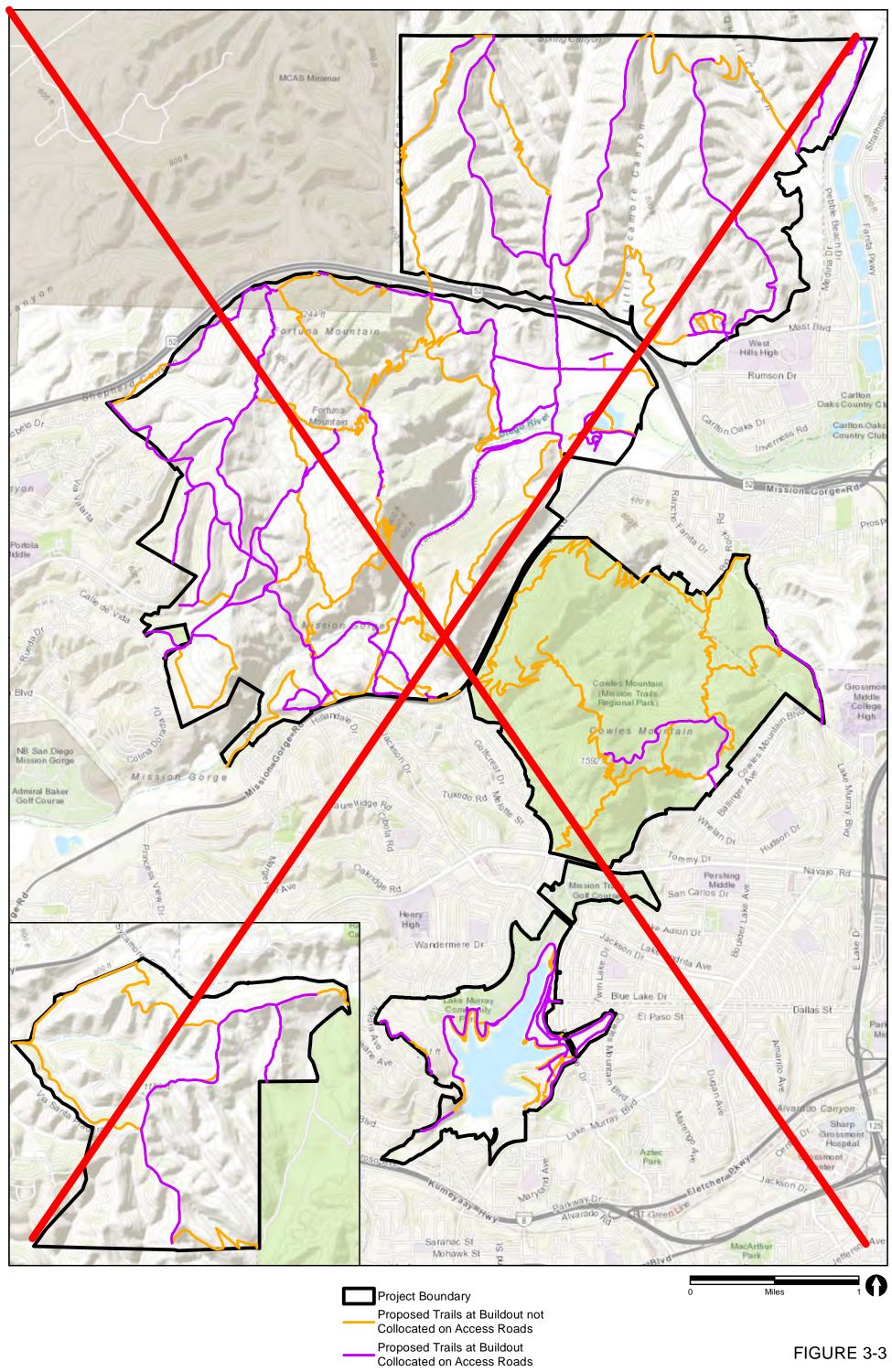
Two areas have contributed to the formation of the West Sycamore area. An agreement between the City and a developer, approved by the City Council in 2001 as part of the Rancho Encantada Precise Plan, obligated the developer to convey 1,568 acres of land within the MHPA. An adjacent 252 acres was previously acquired by the City, which was formerly known as "MTRP North."

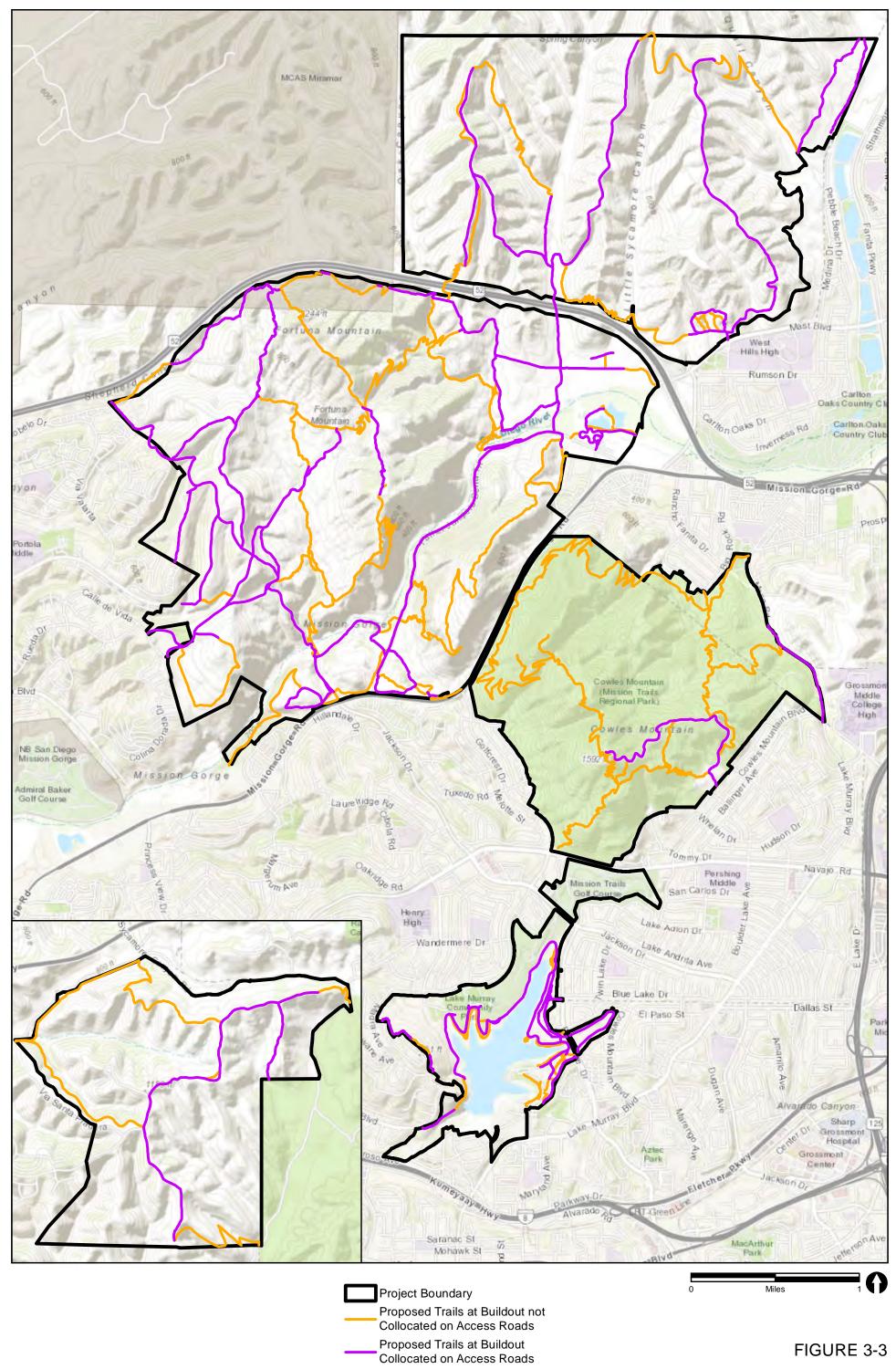
3.2.2 Master Plan Update Recommendations

A planning analysis based on existing conditions in the Park was used to first develop the MPU, which led to the development of recommendations, ranging from broad overarching policy and management related topics that affect the entire Park to specific physical improvements within the areas. The policy and management-related topics that affect the entire Park would generally have no physical impact on the environment, while specific physical improvements (subsequent projects) may, and are therefore analyzed throughout Chapter 5 of this PEIR.

The MPU recommendations pertaining to recreational trails are contained in one of three categories: closures, reroutes, and new construction (Figure 3-3). Trail closures are primarily identified where the existing system is redundant or has been created through unauthorized construction activities. Some closures are not recommended until a new safer and more sustainable trail is constructed. Potential trail reroutes are identified where the existing trail is very steep, showing signs of erosion, or is too close to sensitive species or habitats. For each reroute, localized improvements within the existing trail are to be assessed first to see if corrective measures can be implemented. If localized measures prove inadequate or infeasible, then the trail is recommended for a more substantial reroute. The last category is new trails that improve access to the Park, provide alternative access to sections of the Park, or create interconnected loops.

The general approach to habitat impacts due to future trail projects is to minimize and avoid to the maximum extent practicable, but to also utilize on-site mitigation banking through restoration efforts associated with recommended trail closures and other areas of disturbed habitats. If adequate restoration efforts have not occurred prior to new impacts, off-site mitigation will need to be incorporated into the scope of a subsequent project.





The broad Park-wide recommendations as presented in the MPU are presented first, followed by each area within the Park. Within each of the following sections, the recommendations are presented in the following order:

- a. General Recommendations
- b. Planning Recommendations
- c. Management Recommendations
- d. Funding Recommendations
- e. Facilities Recommendations
- f. Habitat/Species Recommendations
- g. Recreation Recommendations

3.2.2.1 Park-wide Policies

a. General Recommendations

- 1. Aspire to serve the comprehensive recreation, education, and cultural needs of the San Diego region and be available for other uses as appropriate or necessary.
- 2. Manage the park to be in compliance with the City of San Diego MSCP Subarea Plan.
- 3. Implement the habitat and species-specific management recommendations contained in the MTRP NRMP.
- 4. Endeavor to make the park universally accessible to the extent practicable.
- 5. Strive to support projects that promote sustainable practices within and around MTRP.
- 6. Carefully manage potential concessionaires within the park and ensure they include a well-conceived marketing program.

b. Planning Recommendations

- 1. Update the MTRP Master Plan every fifteen to twenty years to keep it current with new planning requirements, environmental knowledge, completed projects, and recreational needs.
- 2. Implement and update the MTRP NRMP as required to ensure continued compliance with the City of San Diego MSCP Subarea Plan.
- 3. Design neighborhood or community parks on the perimeter of MTRP to be compatible in design with the park and function as additional community entries and trailheads to the park.
- 4. Incorporate trail linkages and public recreation into new developments adjacent to the park.
- 5. Continue to enforce the City of San Diego Mission Trails Design District Ordinance and Design Manual except within the West Sycamore expansion area because the land is 100 percent conserved and does not have development potential.

- 6. Remove the extension of Clairemont Mesa Boulevard and the addition of Jackson Drive within the park boundaries as part of the next Tierrasanta Community Plan update.
- 7. Maintain the wilderness character and visual integrity of the park's higher elevations in a natural state, especially the ridgeline land mass between Cowles and Fortuna Mountains.
- 8. Continue to prohibit all off-road vehicle use within the park.
- 9. Cluster intensive recreational uses, such as staging and group picnic areas, to minimize park roads and infrastructure costs.
- 10. Support the dedication of designated open space within and around MTRP. All potential dedications shall be reviewed by City PUD, SDCWA, and SDG&E to determine if there are facilities that need to be excluded. As part of the Open Space Dedication process, underlying zoning should be updated as appropriate.
- 11. Continue to support water reclamation for stream replenishment. Every effort should be made to ensure that the San Diego River flows as a "live stream" throughout the year for long-term recreational and ecological values.
- 12. Continue to subject sand and gravel, and/or other mineral extraction sites adjacent to the park to Conditional Use Permit (CUP) procedures, and include Reclamation Plans as required by the State's Surface Mining and Reclamation Act of 1975. Such plans should include both operations and rehabilitation programs that are compatible with park objectives.
- 13. Accommodate trail linkages and public recreation in rehabilitation plans for mineral extraction areas along the San Diego River and adjacent to the park. This may include flood plain controls along the San Diego River to ensure major trail connections into and out of the park.
- 14. Require a Right of Entry permit for commercial users and limit their number and frequency as appropriate to protect the resources of the park.
- 15. Enforce the MTRP tree planting guidelines approved by the CAC and Task Force (Appendix C of the MPU).
- 16. Develop an overall tree planting plan to be used in conjunction with the tree planting guidelines to guide annual Arbor Day plantings, as well as other donations or volunteer efforts.
- 17. Coordinate with the Cities of San Diego and Santee and SANDAG to determine the feasibility of providing a bus stop at one or more locations near the Park.
- 18. Support the implementation of the City of San Diego's San Diego River Park Master Plan within the boundaries of MTRP.

c. Management Recommendations

1. Continue the roles of the MTRP Task Force and CAC in the planning and implementation process.

- 2. Develop maintenance guidelines to adapt the existing network of roads within the park to minimize the disruption of the natural hydrology and maintain a walking and riding surface that is conducive to recreational use. These guidelines should identify maintained widths, surface materials, and grading practices for all utility and access roads within the park, and should be reviewed and approved by the City's Parks and Recreation Department, the City PUD, SDCWA, and SDG&E.
- 3. Minimize the development impact of any infrastructure facility and seek an environmental and/or financial contribution from the project for the park. The MTRP CAC and Task Force have an approved "Good Neighbor Policy" (Appendix D of the MPU) with SDCWA for development and maintenance of their facilities within the park. Similar policies should be encouraged with other entities as projects are proposed within the park.
- 4. Protect and manage identified cultural resources through proper planning for avoidance of significant impacts, maintain site identification markings as appropriate, enforce historic preservation regulations for all park users, and develop and maintain an archaeological site monitoring program.
- 5. Develop a plan in cooperation with interested local historical and archaeological groups, local Native American tribes, and educational institutions to promote public participation in historic preservation and enjoyment of cultural resources within MTRP.
- 6. Hold periodic informal meetings between park rangers and members from each of the major recreational groups (e.g. hikers, cyclist, equestrian, rock climbing) to discuss trail planning, design, implementation, and maintenance needs/concerns throughout the park. After review by City staff, the City Park Ranger would present issues/projects that are consistent with the Master Plan to the CAC and Task Force for recommendation of approval to the Director of the Parks and Recreation Department. The park ranger would present issues/projects to the CAC, Task Force, and City staff for approval, that are consistent with the master plan.
- 7. Hold periodic coordination meetings with MCAS Miramar Provost Marshal on trespass issues between the park and the installation.
- 8. Develop an emergency response plan for the park in collaboration with San Diego Fire-Rescue and San Diego Police Departments.
- 9. Develop a Fire Response Plan that identifies access points, preferred routes, and prioritizes the use of existing roads as fire breaks over new grading. The Plan will identify resource protection areas, fire suppression priorities based on resource sensitivity, and post-fire BMPs to minimize erosion and sedimentation, and invasive weed control.
- 10. Develop paleontological monitoring and discovery treatment plans for any project that will include disturbance of native bedrock formations.
- 11. Develop archaeological data recovery programs for any projects that may impact cultural resource sites. Priority will be given to avoidance and minimization of impacts prior to implementing a data recovery program.

- 12. Develop a public awareness campaign for recreational users covering park rules, regulations, and boundaries.
- 13. Develop and implement a public information and education program focused on the requirements of the MSCP relative to the management and use of different areas of the park.
- 14. Conduct regular patrols of the park and enforce park rules, regulations and boundaries.
- 15. Coordinate with local tribal members and Park Ranger staff to allow access to traditional tribal use areas within the park.
- 16. Consider future efforts to conduct park-wide cultural resources surveys including, but not limited to identification of potential tribal cultural landscapes within the park.

d. Funding Recommendations

- 1. Continue to use existing funding sources, such as the MTRP Antennae fund and the City's Environmental Growth Fund and Regional Park Fund, to implement high-priority projects.
- 2. Continue to vigorously pursue State and Federal funding for urban regional parks and trails.
- 3. Pursue grant funding from the San Diego River Conservancy for the design and construction of the San Diego River Trail.
- 4. Pursue other grant sources and non-profit partnerships whenever viable to help implement projects.
- 5. Implement an accounting system to track material costs and staff/volunteer labor hours used annually within the various areas of the park to maintain the existing improvements. Use this information to help prioritize the individual recommendations contained in the MPU.
- 6. Augment park staff and maintenance funding commiserate with the implementation of new facilities, recreational amenities, or trails.

e. Facility Recommendations

- 1. Incorporate consistent architectural design vocabulary on any new structure with other buildings in the park and use common rooflines, basic shapes, and structural connections as unifying elements, allowing differences in materials, textures, and colors to reflect the unique character of each use and location.
- 2. Include overhangs and shade elements on any new structures to shelter people from the sun.
- 3. Install and maintain simple, consistently designed park furniture picnic tables, benches, trash receptacles, directional signs.
- 4. Support the designation of major roads within and adjoining the park as scenic corridors or parkways.

- 5. Maintain a strong identity, location and image of the park and its boundaries through effective identification graphics and other means. All signage should be consistent with the MTRP Park Signage Program, see Appendix E of the MPU.
- 6. Maintain and repair existing signage on an as needed basis.
- 7. Install, maintain, and repair directional signage on an as needed basis.
- 8. Construct and maintain signage with maps showing accessibility information, use areas, trails, access points and mileage near each of the major entry points into the area.
- 9. For new and/or significantly rerouted trails designate official trail names and publish updated trail maps on an as needed basis.
- 10. Develop and incorporate additional interpretive signage along the major trails near interpretable features, rest stops, or overlooks.
- 11. Assess the need for additional seating along sections of trails to provide rest stops.
- 12. Plant only native plants within the park.
- 13. Continue to prohibit fires in the park to reduce fire danger, except within developed fire rings at the Kumeyaay Lake Campground, the East Fortuna Staging Area, and Lake Murray.
- 14. Maintain and repair park and utility roads and crossings of streams on an as needed basis.
- 15. Construct vehicular on-grade dip crossings of creeks and drainages with local rock to create a stable crossing where practicable. Concrete dip crossings or bridge structures may be required due to local site conditions.
- 16. Conduct brush management in the brush management zone around all habitable structures within the park in accordance with City of San Diego brush management regulations.
- 17. Provide accessibility signage at each major park entry/trailhead in consultation with the Open Space Division.

f. Habitat/Species Recommendations

- 1. Construct fencing as required, maintaining access control to the park.
- Protect populations of identified sensitive plants including: San Diego thornmint, San Diego ambrosia, Variegated dudleya, Del Mar manzanita, Orcutt's brodiaea, Coast barrel cactus, summer holly, and decumbent goldenbush. Reroute existing and proposed trails to avoid impacts.
- 3. Construct wildlife compatible fencing where necessary to protect sensitive species, habitats, and cultural/historic resources.

- 4. Maintain and enhance where possible all regional and local wildlife corridors in and around the park areas.
- 5. Coordinate the repair and maintenance of fencing with Caltrans along SR-52 to direct wildlife towards one of the four existing wildlife crossings.
- 6. Close unauthorized user created trails where appropriate to reduce habitat fragmentation and encroachment.
- 7. Implement the adopted MTRP San Diego Ambrosia Management Plan.
- 8. Eradicate non-native invasive species from the park whenever feasible. Control species that cannot be eradicated on a regular basis to prevent significant spreading. Restore native species and habitats, including vernal pool species throughout the park utilizing local seed/nursery stock when available.
- 9. Coordinate with the San Diego Mitigation Monitoring Program (SDMMP) and other regional stakeholders (including universities) on ways to aid restoration and recovery efforts for habitats and species throughout the park. This would include the collection and storage of native seed from within the park for future habitat mitigation, restoration or recovery efforts within the park in accordance with the Center for Plant Conservation Guidelines.
- 10. Conduct ecological monitoring, adaptive management, and selectively enhance the riparian, chaparral, oak woodland and other wildlife habitats within the park.
- 11. Continue to conduct sensitive species monitoring within Management Guild boundaries in accordance with approved MSCP protocols.
- 12. Conduct annual raptor and cliff-dwelling bird surveys in early spring to ascertain which species are utilizing cliff sites and known stick nests. Localized seasonal trail closures may be required in accordance with federal MBTA law and CA Code 3503.
- 13. Conduct annual focused exit count bat roost surveys during spring/summer, using visual and acoustic techniques simultaneously.
- 14. Conduct surveys for Giant Reed bi-annually (or six months after major flood events) to identify, map, and remove small infestations.
- 15. Coordinate with regional efforts (USGS Western Ecological Research Center) to refine and develop cowbird trapping optimization studies.
- 16. Plan and implement a cowbird trapping program along the San Diego River as deemed necessary by City biologists.
- 17. Re-survey all known populations of variegated dudleya to provide information for the development of additional management actions for the species.

- 18. Conduct Coastal Sage Scrub-Artemisia/Eriogonum adaptive management surveys within the Management Guild boundaries every three years.
- 19. Inventory and minimize impacts to all areas with biological crusts throughout the park and foster conservation and restoration research efforts with the local universities. Minimize impacts to areas with biological crusts during new trail construction or reroutes of existing trails.
- 20. Construct or repair and maintain wildlife compatible exclusionary fencing and signage around populations of San Diego thornmint, San Diego ambrosia, and Willowy monardella as necessary.
- 21. Conduct baseline surveys for priority plant species identified in the NRMP as part of the planning and design of any new or rerouted trails.
- 22. Implement management recommendations contained in the City of San Diego Vernal Pool Habitat Conservation Plan and Mitigation and Monitoring Program.
- 23. Provide a buffer of at least 25 feet from existing populations of San Diego ambrosia from all new or rerouted trails.
- 24. Provide a buffer of at least 50 feet from existing populations of Variegated dudleya from all new or rerouted trails.
- 25. Provide a buffer of at least 100 feet from existing populations of Willowy monardella from all new or rerouted trails.
- 26. Remove exotic weeds from existing populations of San Diego thornmint and San Diego ambrosia.
- 27. Remove exotic weeds from areas that historically contained San Diego thornmint.
- 28. Remove exotic weeds and dethatch vernal pools as necessary. Ensure that no piercing damage to hardpan/cliche layers occurs within vernal pools and their watersheds from construction fences staking or monitoring techniques (i.e. placement of transect posts or rain gauges).
- 29. Dethatch a five-foot radius around each known individual of Willowy monardella.
- 30. Coordinate with SDG&E to control erosional flows emanating from utility access roads within the watersheds of existing populations of Willowy monardella.
- 31. Perform an initial hydrological evaluation to identify erosive hydrological inputs into the watersheds of existing populations of Willowy monardella. The evaluation should include recommendations for appropriate erosion control.
- 32. Conduct pre-construction entrenchment surveys for trail projects within the contributing watersheds of existing populations of Willowy monardella.

- 33. Monitor Willowy monardella individuals and channel stability for a period of five-years after constructing trails within contributing watersheds to detect change as a result of trail construction and inform adaptive management.
- 34. Adaptively manage trails constructed within the contributing watersheds of Willowy monardella to limit anthropogenic affects to the hydrology of the watershed, which could include ultimate closure of the trail.
- 35. Install erosion control measures at identified anthropogenic hydrologic input areas within the contributing watersheds of the willowy monardella populations.
- 36. Treat and remove exotic species from the Coastal Cactus Wren Management Area (CWMA).
- 37. Thin woody and herbaceous vegetation as required to maintain suitable Coastal Cactus Wren habitat within the CWMA.
- 38. Enhance and expand cacti distribution within the CWMA.
- 39. Create and implement a San Diego fairy shrimp egg/cyst collection program and inoculation plan.
- 40. Expand populations of focal species, including San Diego button celery, within historical distributions within the park.
- 41. Install exclusionary signage with specific reference to rock climbing restrictions and enforcement at access points to, and at all cliff bases.
- 42. Expand patrols to include randomly scheduled binocular sweeps where rock climbing is prohibited to target unauthorized recreational access. Violations should be tracked to inform adaptive management actions.

g. Recreation Recommendations

- I. Comply with the City's current Trail Policies and Standards per the current City of San Diego Consultants Guide to Park Design and Development for all new and rerouted trails. Utilize other state and national sustainable trail guidelines as supplements to the City's Standards.
- 2. Construct the majority of trails within the park as "primitive" trails as defined within the City's Trail Policies and Standards. Only those trails designated as multi-use or those with significant use levels should be "improved" to a wider width.
- 3. Collaborate with recognized user groups in the planning, design and implementation of new trails, trail reroutes, and trail closures throughout the park.
- 4. Periodically evaluate all existing trails for localized maintenance needs including, but not limited to: removing berms, installing or repairing grade dips or grade reversals, and gully repair.
- 5. Keep trails and crossings within the riparian corridors and drainages to a minimum.
- 6. Locate trails in the least sensitive areas and provide buffers as needed.

- 7. Place new trails and reroute existing trails outside of riparian buffer zones wherever practicable.
- 8. Construct and maintain trail crossings of creeks and drainages with puncheons and bridges whenever possible. On-grade dip crossings, when necessary, should be made with local rock to create a stable crossing.
- 9. Develop and implement a comprehensive Trail Use Survey program throughout the park to help improve management decisions related to trail usage, maintenance, and potential environmental impacts as funding allows.
- 10. Conduct a Trail Capacity Analysis based on the results of a Trail Use Survey, to determine use thresholds for various portions of the park and then establish ways to maintain usage below the thresholds (e.g. fund-raising runs and the main Cowles Mountain hiking trail) as funding allows.
- 11. Create and implement a policy to control the number and size of fundraising runs held within the park on a monthly or yearly basis to minimize environmental and public use impacts.
- 12. Support efforts to extend the San Diego River Pathway with identification markers through the park.
- 13. Support efforts to extend the Trans-County Trail through the park.
- 14. Support efforts to create a publicly accessible trail corridor (Stowe Trail) between Santee and Goodan Ranch Sycamore Canyon Preserve.

3.2.2.2 Area Policies

a. Lake Murray

Figure 3-4 shows the planning recommendations for the Lake Murray area. The primary goals for the Lake Murray area are to protect the water quality of the reservoir; provide water-related recreation on and around the lake; provide focused recreational activities at the Lake Murray Community Park, Lake Murray Tennis Courts, and Mission Trails Golf Course; and provide a variety of sustainable trails that can accommodate the high number of recreational users while preserving natural and cultural resources.

The riparian corridor below the dam and sensitive species associated with the *Artemisia*-dominated coastal sage scrub association are priorities within the NRMP. Proposed improvements identified as potential subsequent projects focus on closing redundant and unauthorized trails, improving trail sustainability and user access.

The primary objectives are to improve the quality of water-related facilities; to protect the lake environment—especially the shoreline—from overuse congestion; to maintain existing water-oriented recreational activities; and to provide for recreational uses at the community park. No camping or other overnight activities are currently allowed or envisioned.

Planning Recommendations

- P1 Integrate best management practices for urban runoff, fertilizers and pesticides into the operations and management of the golf course when the golf course lease is renegotiated.
- P2 Integrate management practices for invasive nonnative plant control into the operations and management of the golf course with annual City Open Space staff inspections when the golf course lease is renegotiated.
- Should the City ever determine the golf course is no longer viable, an alternative concept would be to use the City owned existing turf and trees between Jackson Drive and Navajo Road for active and passive recreation, family and group picnicking with meandering trails, and a linear open play area connecting Lake Murray with Cowles Mountain. It should be noted that the City of San Diego PUD would need to be compensated for the conversion of the property to public parkland and would retain facility easements for the various utilities within the area.
- P4 Should the City ever determine the golf course is no longer viable, an alternative concept would be to use the City owned land area southwest of Jackson Drive and immediately north of the Lake for a tree-canopied area for picnicking, small group day use, and open play in a protected lake environment. It should be noted that the City of San Diego PUD would need to be compensated for the conversion of the property to public parkland and would retain facility easements for the various utilities within the area.

Recreation Recommendations

- Plan, design, and implement a new trail connection from the Del Cerro community to the western shoreline. The corridor shown would utilize an existing utility access road for about two-thirds the distance before new grading would be required to connect to the publicly open portion of the paved maintenance road. Coordination with City of San Diego PUD regarding proximity to the dam and compliance with MSCP guidelines will be required.
- R2 Create an improved trail connection with the adjacent City of La Mesa Sunset Park.
- Reroute trails that are selected for continued use to ensure a safe and sustainable trail environment.

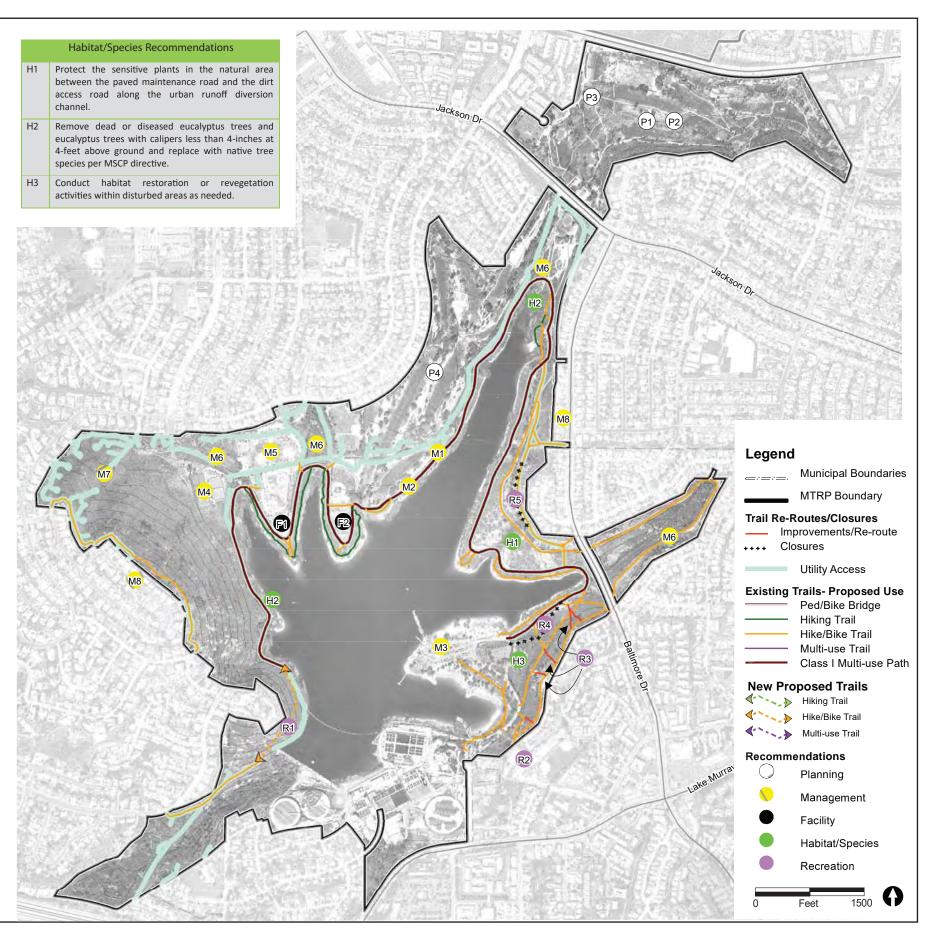
 Close and restore the remainder of the trails crisscrossing the southeast slope.
- R4 Close and restore the hike-bike trail from the upper parking lot to the paved maintenance road along the edge of the lake.
- Close and restore the hike/bike trail located within sensitive habitat along the urban runoff diversion channel.

Management Recommendations

- M1 Continue maintaining the paved maintenance road along the edge of the lake for recreational use by pedestrians, cyclists, and skaters. This may require regular pavement patching and infrequent resurfacing activities when the conditions of the road degrade to a point that compromises user safety.
- M2 Conduct a study to determine the feasibility of restriping the maintenance road along the edge of Lake Murray to improve the movement and safety of the multiple user groups utilizing the road.
- M3 Continue to maintain and support grounds improvements at Alvarado Point, including the picnic areas, concessions facilities, pathways and parking lots to ensure they are safe, accessible and environmentally compatible.
- M4 Continue to maintain and support grounds improvements at the ten tennis courts in partnership with the Lake Murray Tennis Club or another non-profit for the fee-based usage of the courts to ensure they are safe, accessible and environmentally compatible.
- 15 Continue to maintain and support grounds improvements at the community park, including the dedicated sports fields, mixed-use turf areas, concessions stand, comfort station, playground, and parking lots to ensure they are safe, accessible and environmentally compatible.
- M6 Continue to maintain the urban runoff diversion channel around the lake and look for opportunities to improve the water quality within the channel before it is discharged downstream of the dam.
- M7 Continue to maintain the utility access roads and look for opportunities to lessen their gradients and correct fall-line conditions, both of which contribute to erosion and sedimentation down-slope. Install signage and fencing as required to prevent unauthorized trail use.
- M8 Monitor the perimeter of the Lake Murray area for private property encroachments and coordinate enforcement actions to remove the encroachment.

Facility Recommendations

- Develop a group picnic area with several small or one large shade structure and picnic tables in the undeveloped area south of the ball fields between Del Cerro Bay and Cowles Bay with primary access from the community park per the approved General Development Plan.
- Plant the disturbed area south of the ball field on San Carlos point with native plants and incorporate a few small shade structures, picnic tables and benches accessed from the paved maintenance road per the approved General Development Plan.



b. Cowles Mountain

Figure 3-5 shows the planning recommendations for the Cowles Mountain area. The importance of Cowles Mountain as an open space backdrop for urban San Diego is reflected in the use concept. The area is primarily a place for passive daytime activities that do not require extensive landform changes and expensive infrastructure and facilities. The trails and service road on the mountain need rehabilitation and erosion protection. New trails, rest stops, and overlooks need to be introduced selectively. No camping or other overnight activities are planned because of the area's urban edge and high visibility.

The goal for this area is to provide a variety of sustainable trail facilities that can accommodate the high number of recreational users, while preserving natural and cultural resources. The riparian corridor and *Artemisia*-dominated coastal sage scrub association near Big Rock Park are priorities within the NRMP, as are the bat roosts along the western face of Pyles Peak. <u>Additionally, the interior portions of Cowles Mountain have previously been identified to support wildlife safe harbor zones (e.g., bobcat), as well as deer travel routes that start north of Mission Gorge Road. Proposed improvements identified as potential subsequent projects focus on closing redundant and informal trails, improving trail sustainability and access, and creating the opportunity for loop or destination trails.</u>

The original vision for trails within the area was for a series of loop trails: one on the southwest slope; one on the southeast slope; and one on the northeast slope. While the interior portions of many of these have been constructed, only a reduced version of the northeast loop currently exists. Creating a longer loop trail on the northeast slope would fulfill this vision and help reduce the user congestion and potential safety concerns related to the mixed heavy bidirectional (slow uphill versus fast downhill) use of the service road and Big Rock trails by both cyclists and pedestrians.

Maintaining the integrity of Cowles Mountain would require sensitive trail location and design to avoid visual scars. It would also require the restoration and revegetation of areas already disturbed. Other considerations include providing shade for the summer user and designing these park elements so that they are unobtrusive.

The existing shared City and County of San Diego communications facilities (receiving/transmitting antennas), service road, and related compound near the summit of Cowles Mountain present a unique challenge. Aesthetically, they should be relocated outside the Park. Realistically, local agreements make this impractical. Additionally, approximately 1,400 acres of Cowles Mountain is jointly owned by the City and the County of San Diego, while a portion is owned by the County of San Diego only as shown in Figure 2-5a.

Facility Recommendations

affect adjacent neighbors and park users.

affect adjacent neighbors and park users.

Manager of Microwave/Radio Communications.

Habitat/Species Recommendations

extraction activities along Mesa Road.

Conduct habitat restoration or

activities within disturbed areas.

exclusionary fencing and signage as required.

with his environment.

park users.

Recreation Recommendations Implement localized trail improvements to create a more accessible, maintainable and environmentally sensitive trail from the existing Cowles Mountain staging area to the summit. If localized improvements prove inadequate, then a full trail reroute should be evaluated R2 Assess a section of the Barker Way trail for localized improvements to address trail steepness and erosion issues. If localized improvements are inadequate or infeasible, then this section of trail should be rerouted. R3 Develop and implement a public access boundary with fencing and signage at the top of Cowles Mountain to reduce habitat impacts. Restore native habitats outside the defined boundary. Close and restore the existing hike/bike and unauthorized user created trails extending from the Cowles Mountain service road to the Barker Way R5 Close and restore the hike/bike trail extending from Wingspan Drive to the Barker Way Trail. R6 Construct a new trail alternative to avoid a particularly steep section of the Cowles Mountain R7 Close and restore the existing hiking and unauthorized user created trail on the eastern slope Close and restore a series of interconnected existing hiking trails on the eastern slope of Cowles Mountain. A portion of these trails are within the California gnatcatcher Critical Habitat designated by the USFWS. Assess a section of the Big Rock trail for localized improvements to address trail steepness and erosion issues. If localized improvements are inadequate or infeasible, then this section of trail should be rerouted R10 Close and restore the existing hiking trail located immediately behind the homes along Big Rock Road. R11 Construct a new trail connection from the Padre Dam water tank to Big Rock to create a portion of a large loop on the east side of Pyles Peak and north side of Cowles Mountain R12 Construct a new trail connection from the Padre Dam water tank to the staging area in CM-F2 to create a portion of a large loop on the east side of Pyles Peak and north side of Cowles Mountain. R13 Close and restore an existing hiking trail along the ridge north of Pyles Peak. R14 | Assess a section of the existing Pyles Peak trail for localized improvements to address trail steepness and erosion issues. In-trail grade reversals and reestablishment of outslope should be adequate solutions. R15 Close and restore the existing hiking trail from Pyles Peak down to Golf Crest Drive. R16 If the staging area in CM-F2 is implemented, construct a new connector trail from it up to the existing Pyles Peak trail. R17 If the staging area in CM-F2 and the trail in CM-R12 are implemented, evaluate providing rock climbing access to the western face of Pyles Peak by constructing a new trail from the existing Pyles Peak trail. Impacts to bat roosts will need to be evaluated; signage and access controls will be

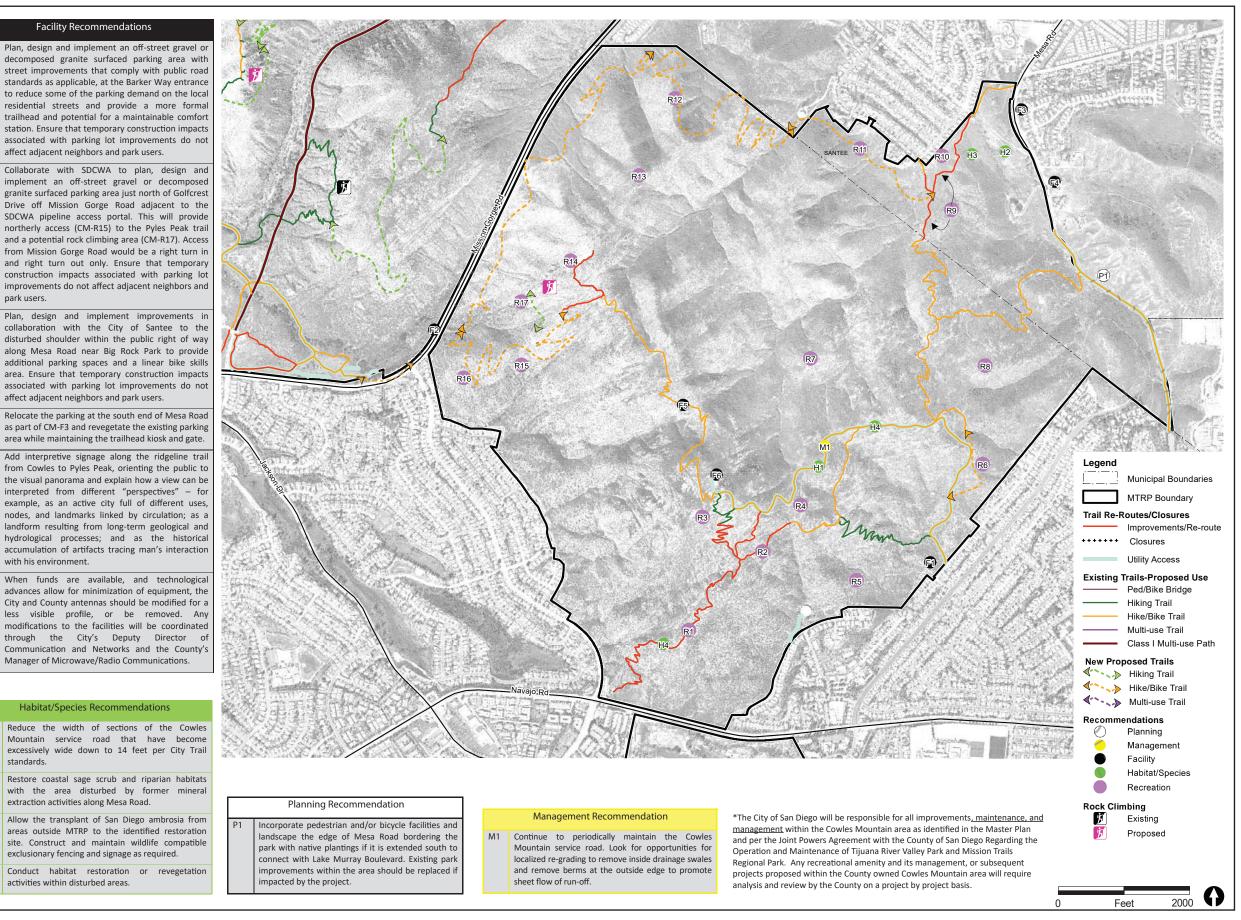


FIGURE 3-5

required at the top of the climbing faces to control

unauthorized access to the top of Pyles Peak; and an

emergency response plan will need to be

coordinated with San Diego Fire and Rescue.

standards.

c. Mission Gorge

Figure 3-6 shows the planning recommendations for the Mission Gorge area. The goal for the Mission Gorge area is to provide a variety of sustainable trails and other park amenities that can accommodate the high number of visitors radiating out from the Visitor and Interpretive Center while preserving natural and cultural resources. The riparian corridor along the river, the San Diego ambrosia near the Kumeyaay Lake Campground, and the raptor and bat roosts on Kwaay Paay are priorities within the NRMP. Proposed improvements identified as potential subsequent projects focus on closing redundant and informal trails, improving trail sustainability, and user access.

Uses within the Mission Gorge area would continue to balance preservation, interpretation, and recreational use so they complement one another. Cultural sites and wildlife habitats are to be respected, while providing facilities that encourage people to enjoy the area. By fostering a slower-paced experience by foot or bicycle, the visitor will be encouraged to learn about the site, its history and environmental values, and to see how it changes with the seasons and over the years. The Visitor and Interpretive Center and the multi-use path along Father Junipero Serra Road are two of the most utilized portions of the Park by out of town visitors. The interpretive and educational programs centered on the Visitor and Interpretive Center would continue to be a focal point for this area of the Park. Implementation of the San Diego River Park Master Plan would reinforce the regional recreational use of this area.

The river bank below and roughly parallel to Father Junipero Serra Trail would remain closed to protect nesting habitat for the least Bell's vireo, potential nesting habitat for the southwestern willow flycatcher, and cultural resources within the floodplain of the river. The riparian corridor within the bottom of the river gorge, west of the San Diego River Crossing Trail, would remain closed to the public to protect nesting habitat for the least Bell's vireo, potential nesting habitat for the southwestern willow flycatcher, significant roosts of the pocketed free-tailed bat, and cultural resources within the floodplain of the river.

d. Fortuna Mountain

Figure 3-7 shows the planning recommendations for the Fortuna Mountain area. The Fortuna Mountain area would provide a variety of sustainable trails that create loops of varying length and difficulty to accommodate a wide range of recreational users while preserving natural and cultural resources. This area is the largest of the Park and contains the largest number of existing roads and trails. The riparian corridors associated with Suycott Wash, Oak Canyon, and the San Diego River are priorities within the NRMP, as are the San Diego ambrosia near the Kumeyaay Lake Campground, the bat roosts on South Fortuna Mountain and at the old quarries, the *Artemisia-Eriogonum* association of coastal sage scrub, and the clay lens and associated sensitive species and vernal pools along the Tierrasanta ridgeline.

Proposed improvements identified as potential subsequent projects focus on closing redundant and informal trails, improving trail sustainability and user access. Recommendations contained in the MPU reflect both the opportunities and challenges creating a safe and sustainable network of recreational trails. The area also contains a portion of the San Diego River Trail.

Recreation Recommendations Facility Recommendations Habitat/Species Recommendations Construct the segment of the San Diego River Construct one or more electric vehicle charging H1 Use the closed trail (MG-R11) area to expand the Pathway with identification markers as envisioned in stations within the existing Visitor and Interpretive population of San Diego Ambrosia. the San Diego River Park Master Plan from the Center parking lot if analysis supports it. Conduct habitat restoration or revegetation southern park boundary approximately 1.06 miles. activities within disturbed areas as needed. Operate Kumeyaay Lake Campground as an This trail segment is primarily along an existing overnight campground. bench cut overlooking the river gorge to the eastern edge of the Deerfield Bike Skills Area. An Improve the Deerfield Bike Skills Area to create a **Management Recommendation** information kiosk should be constructed at the broader variety of features that are appropriate for southern end of the trail. M1 Maintain the San Diego River as a "live stream" that a wider range of user types and skills. flows year round. Continue to support water Improve the connection between the San Diego Continue to support the Visitor and Interpretive reclamation for stream replenishment within the San River Crossing staging area and the Deerfield Bike Center program and display enhancements. Diego River. Skills Area as part of the San Diego River Pathway improvements within the park. Due to the volume Conduct a Parking Study to determine the parking of storm water runoff within the drainage during the shortfall that exists during periods of peak park Planning Recommendations wet season, a significant bridge crossing or benched trail adjacent to Mission Gorge Road is Maintain the river gorge between the Old Mission Construct a parking lot on the easterly side of Father recommended. Dam and the southern park boundary as a secluded Junipero Serra Trail between Mission Gorge Road Improve the section of the Visitor Center Loop trail area without major facilities. and the Visitor and Interpretive Center driveway from the San Diego River Crossing staging area to (P3) entrance per the recommendations from the Ensure that trail linkages through the park are made the Visitor and Interpretive Center to a wider, more Parking Study in MG-F5. Relocate existing picnic as shown in the San Diego River Park Master Plan. accessible trail to facilitate the use of the San Diego tables and other improvements as necessary. River Crossing staging area as overflow parking for Consider acquiring the 200+ acres currently owned the Visitor and Interpretive Center. This section of Preserve and maintain the Old Mission Dam through by the City of San Diego PUD on Kwaay Paay as trail is also included as part of the proposed San the acquisition of permits required for long-term Legend dedicated parkland. The PUD would retain Diego River Pathway alignment through the park. periodic removal of siltation. easements for their facilities. Municipal Boundaries Construct an all weather suspension or truss Construct a permanent restroom at the Old Mission Coordinate with adjacent land owners to restore the pedestrian and bicycle bridge across the San Diego MTRP Boundary Dam staging area to replace the existing portable perimeter berm around Kumeyaay Lake and redirect River near the San Diego River Crossing trail. the San Diego River back to its former course to San Diego River Pathway Construct an improved low-flow crossing or reduce sedimentation the introduction of exotic Remove accumulated silt from the Kumeyaay Lake. species, and increased mosquito breeding within the seasonal removable bridge structure at the San **Trail Re-Routes/Closures** lake. Ensure that redirection of flows reinvigorates Diego River Crossing to remove the unauthorized Construct and maintain a park entry sign at the east the adjacent least Bell's vireo habitat and wetland Improvements/Re-route existing use of the concrete encased sewer main. end of Father Junipero Serra Trail and Mission Gorge mitigation site which the river once flowed through while a bridge option (MG-R4) is developed. Road per the signage guidelines. +++++ Closures Improve the surfacing of the Oak Grove trail to Construct the Deerfield Canyon Nature Park, Utility Access provide all weather access. Improvements may approximately 2 acres, located adjacent to the require some localized rerouting to lessen trail Deerfield Bike Skills Area. Park amenities could **Existing Trails-Proposed Use** gradient. include picnic areas, trails, interpretive panels, Ped/Bike Bridge fitness course, children's play area of natural looking Construct a new trail connection along the Mission play structures, parking, and native landscaping. Gorge Road embankment from the Oak Grove trail Hiking Trail to the intersection of Golfcrest Drive and Mission Hike/Bike Trail Gorge Road. This will provide improved community Recreation Recommendations (continued) Multi-use Trail access into the park, as well as the potential for R14 | Construct a new bridge crossing at Kumeyaay Lake connectivity with the Cowles Mountain area if the Class I Multi-use Path staging area (CM-F2) and trail (CM-R16) to create a loop trail from the campground. recommendations within that area are constructed. **New Proposed Trails** Construct a new trail connection from the Climbers Hiking Trail Loop trail to Kwaay Paay peak to create a loop trail Hike/Bike Trail over Kwaay Paay. Multi-use Trail Assess the Kwaay Paay hiking trail for localized improvements to address trail grades and erosion Recommendations issues. If localized improvements are inadequate or infeasible, then sections of the trail should be Planning Management R10 Close and restore the access trail from Simeon Drive Facility to Father Junipero Serra Trail. R11 Close and restore the western Kwaay Paay access Habitat/Species trail from the Old Mission Dam staging area to avoid Recreation direct conflicts with the protection of San Diego Ambrosia **Rock Climbing** R12 Implement San Diego River Pathway identification Existing markers along existing sections of the proposed alignment within the park. Proposed R13 Close and restore the existing hiking trail from the Kwaay Paay peak down to the cliffs above the Climbers Loop trail.

FIGURE 3-6

Planning Recommendations Assess a section of the southeastern portion of the Consider acquiring the 200+ acres currently owned by Quarry Loop trail for localized improvements to the City of San Diego PUD on the eastern slopes of address steepness and erosion issues. Reroute this South Fortuna as dedicated parkland. The section of access road if localized improvements are Department would retain easements for their inadequate or infeasible facilities. Close a couple of sections of old road bed along the northern edge of the Old Quarry. Pursue the acquisition of the San Diego Unified R3 Assess a section of the eastern portion of the Quarry School District parcel for park use or a public access Loop trail for localized improvements to address steepness and erosion issues. Reroute this section of When the adjacent Camp Elliott Park and San Diego access road if localized improvements are Unified School District parcels (outside MTRP) are inadequate or infeasible. developed, construct a trailhead and staging facility Provide a new section of hike/bike trail to redirect consistent with the Mission Trails Design District users away from the nearby vernal pool. Ordinance and consider a boundary adjustment to R5 Provide a new overlook of the San Diego River. Close and restore several small sections of existing Pursue the acquisition of a public access easement hike/bike trails or abandoned access roads. within the SDCWA easement and the Villa Domingue Viewhome Home Owners Association to R7 Assess a section of hike/bike trail for localized ensure legal access to the existing ridgeline trail. improvements to address steepness and erosion issues, and potential conflicts with San Diego Ensure that trail linkages along the length of the thornmint habitat. Reroute this section of trail if park are made as shown in the San Diego River Park localized improvements are inadequate of Master Plan. infeasible. Install wildlife compatible fencing and signage adjacent to the existing and potential San The eastern slope of Fortuna Mountain should Diego thornmint habitat. Legend remain in its near-natural state, accommodating Provide a new section of hike/bike trail as an only trails coming over the ridgeline. alternate recreational trail connection to Suycott Municipal Boundaries Wash and South Fortuna to avoid a 0.48 mile section of utility access road that sustains 15-30 **Facility Recommendations** MTRP Boundary percent gradients. The trail would begin just north of the San Diego River Crossing and proceed north Construct the last phase of improvements at the *xxxx+x along the eastern slope above the Suvcott drainage San Diego River Pathway East Fortuna Staging Area per Site Development and connect to the existing South Fortuna trail Planning and design of the trail will need to address Permit #40-0524 which includes an administrative/ Trail Re-Routes/Closures access concerns related to the Visitor Center Loop maintenance building and a large covered group quarry immediately to the east and the drainage to picnic area at the East Fortuna Staging Area. Improvements/ Re-route the west, both of which contain sensitive resources. ++++ Closures Consider providing fire resistant shade structures Assess a section of the southern portion of the consistent with the MTRP Design Guidelines South Fortuna hiking trail for localized (Appendix G) at key interior locations within the improvements to address steepness and erosion Utility Fortuna Mountain area where appropriate. issues. Reroute this section of access road i localized improvements are inadequate of **Existing Trails-Proposed Use** Reconstruct the Old Mission Dam overlook on the infeasible northern river bank. Consider developing the - Ped/Bike Bridge R10 Provide rock climbing access to the eastern face of overlook as a deck structure to prevent access from South Fortuna by constructing a new hiking loop Hiking Trail the downslope area. trail from the existing South Fortuna trail. Planning and design of this trail will need to address - Hike/Bike Trail proximity to bat/raptor roosts, safety concerns Habitat/Species Recommendations relative to falling rocks, and emergency response Multi-use Trail concerns that include improvements to vehicular Collaborate with the appropriate parties as needed Class I Multi-use Path access to the area and/or the designation of a to develop improved surveillance and enforcement helicopter landing area. mechanisms to prevent recreational usage of the **New Proposed Trails** R11 Assess a section of the Suycott Valley South Trail for wildlife tunnel under SR-52, which is impacting its localized improvements to address steepness and Hiking Trail use by wildlife and contributing to trespass on MCAS erosion issues. Reroute the trail if localized improvements are inadequate or infeasible. Hike/Bike Trail Assess a section of the Suycott Valley trail for Install and maintain 'Sensitive Habitat Keep Out' Multi-use Trail localized improvements to reduce the number of signage along the trails nearest the Southwest creek crossings and erosion issues. Reroute the trail Boundary Quarry and the Visitor Center Loop Quarry Recommendations if localized improvements are inadequate of to protect the significant bat roosts that exist in infeasible. these locations and issue warnings or citations to all Planning R13 Close and restore a section of old redundant utility violators. Management Map the spatial extents of biological crusts within R14 Close and restore a section of redundant park access the Tierrasanta Clay Ridge management area. Facility Conduct habitat restoration and revegetation R15 Close and restore a section of redundant park access Habitat/Species activities within disturbed areas as needed. R16 Assess a section of the Rim trail for localized Recreation * General recommendation for plan area improvements to reduce or eliminate encroachmen on adjacent vernal pools and watersheds. Reroute No specific management recommendations **Rock Climbing** the trail if localized improvements are inadequate or unique to the Fortuna Mountain Area were Existing identified during development of the MPU. Close and restore a section of redundant park access Proposed R18 Assess a section of hike/bike trail for localized improvements to address erosion issues.

FIGURE 3-7a

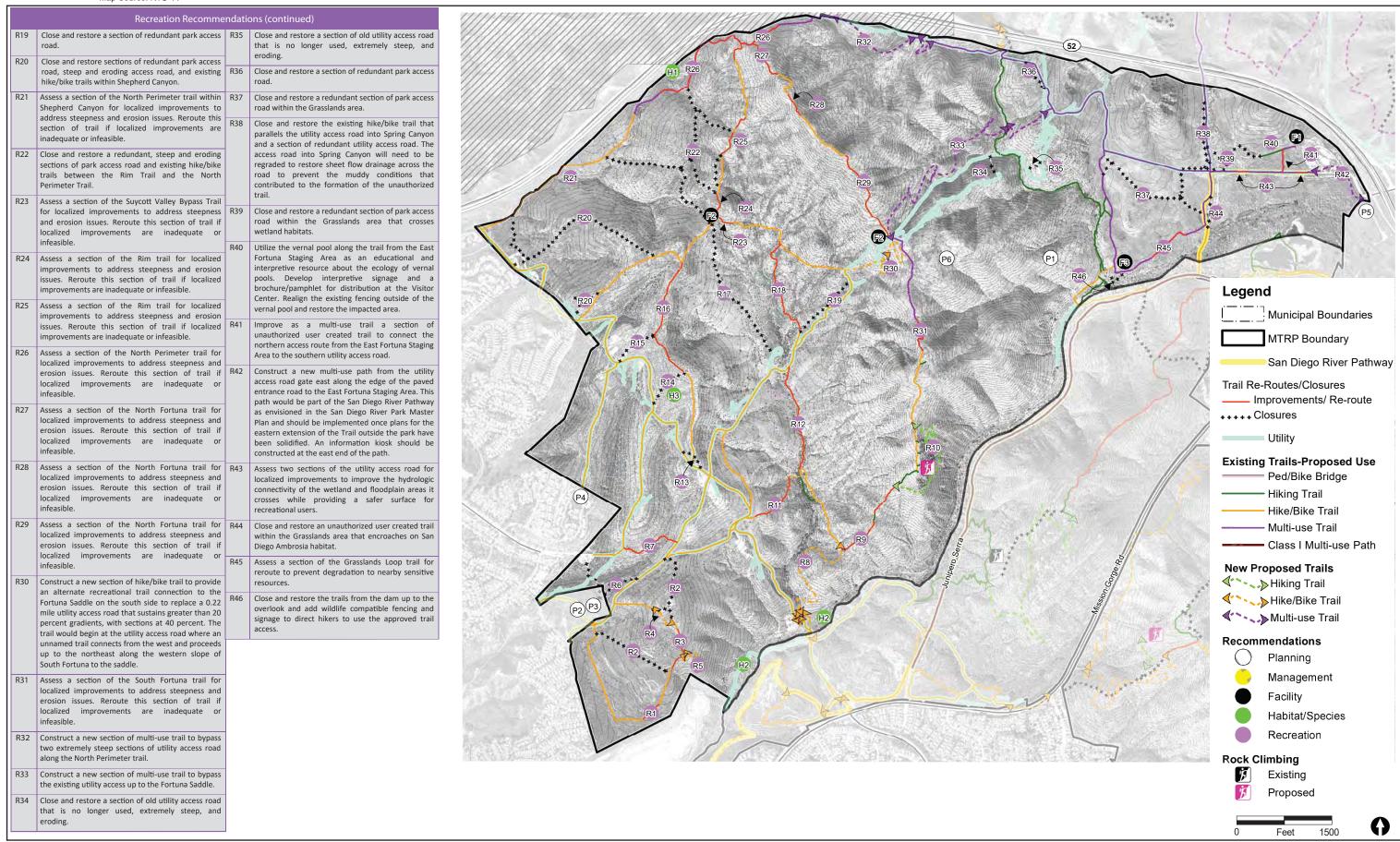


FIGURE 3-7b

The basic planning concept balances preservation, interpretation, and recreational trail use so they complement one another. Cultural sites and wildlife habitats are to be respected, while providing passive recreational opportunities. Rock climbing access to the old quarry cliff faces along the San Diego River, both up and down stream of the San Diego River Crossing Trail, would remain closed to protect nesting habitat for the least Bell's vireo. These areas are also identified as potential nesting habitat for the southwestern willow flycatcher, and are significant roosting sites for the state sensitive pocketed free-tailed bat, which is sensitive to human encroachment.

e. East Elliott

Figure 3-8 shows the planning recommendations for the East Elliott area. Habitat and species preservation are the driving force behind the acquisition of lands within the East Elliott area. Public access and recreational use would be viewed as secondary uses. Recreational trails are identified as compatible uses within the MSCP as long as they do not compromise the long-term ecological values of the area. The riparian corridors and the willowy monardella habitat associated with Oak Canyon and Spring Canyon are priorities within the NRMP, as are the clay lens along the ridgelines and the *Artemisia-Eriogonum* dominated coastal sage scrub that occurs within the eastern half of the area. Planning and implementing ecologically appropriate recreational trail loops is the focus of park planning efforts within this area. For this reason, and to address functionality of the existing wildlife corridor, the trail alignments for Oak and Spring Canyons have been revised as follows:

The trail alignment for Oak Canyon has been relocated outside of the bottom of Oak Canyon and positioned adjacent to the ridgeline utility road. This newly revised alignment includes a combination of existing (0.62 mile) and proposed (1.60 miles) trails to create a 2.22-mile hike/bike trail. The revised trail alignment for Spring Canyon relocates a portion of trail that extended around areas identified for mitigation for the expansion of the landfill, creating a more direct connection parallel, but outside of the SR-52 right-of-way, and reduces not only the bisecting of the wildlife corridor, but also reduces the length of the proposed trail by over 0.5 mile, to 1.50 miles. Overall, the two revised alignments reduced the proposed trail length in the East Elliott area by 16 percent, from 7.13 miles to 5.99 miles.

Multiple length trail loops are a key planning concept for this area to discourage continued recreational trespass into MCAS Miramar that is prevalent within Oak and Spring Canyons. Providing northern connectivity to the County of San Diego's proposed Stowe Trail corridor that would connect northward to Goodan Ranch, Sycamore Canyon Preserve, outside of the MCAS Miramar installation boundary, is also a long-term priority.

The East Elliott area currently contains several utility access roads and many unauthorized user-created trails. The utility access roads are primarily located along the ridgelines and contain some extremely steep sections that require regular maintenance to address erosion that make these roads unsuitable as recreational trails. Many of the user-created trails are well constructed narrow contour and single-track trails. However, a majority of these trails are within natural drainages that contain the more sensitive natural resources within the area. As such, some are recommended for closure, while others are recommended for localized reroutes.

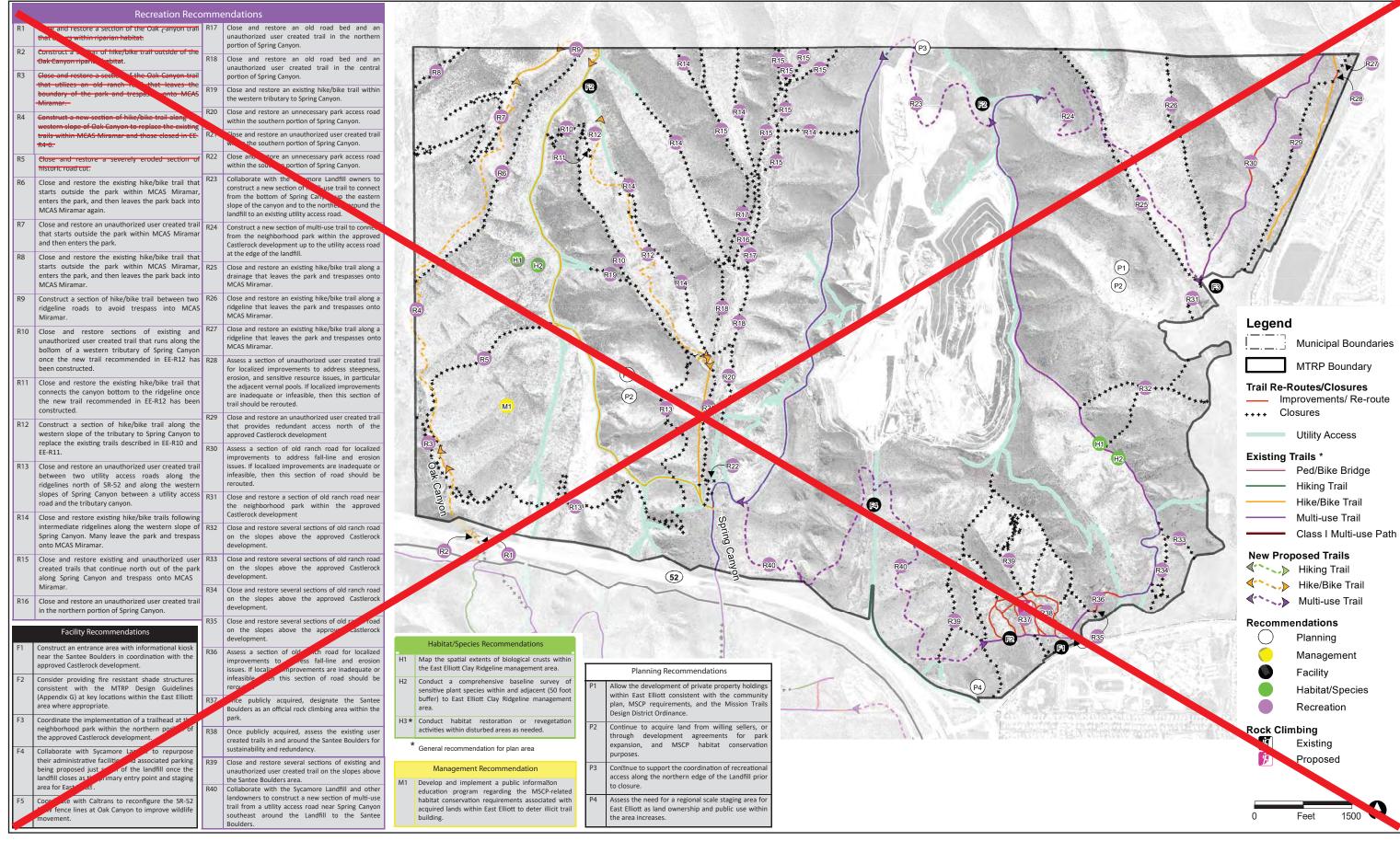


FIGURE 3-8

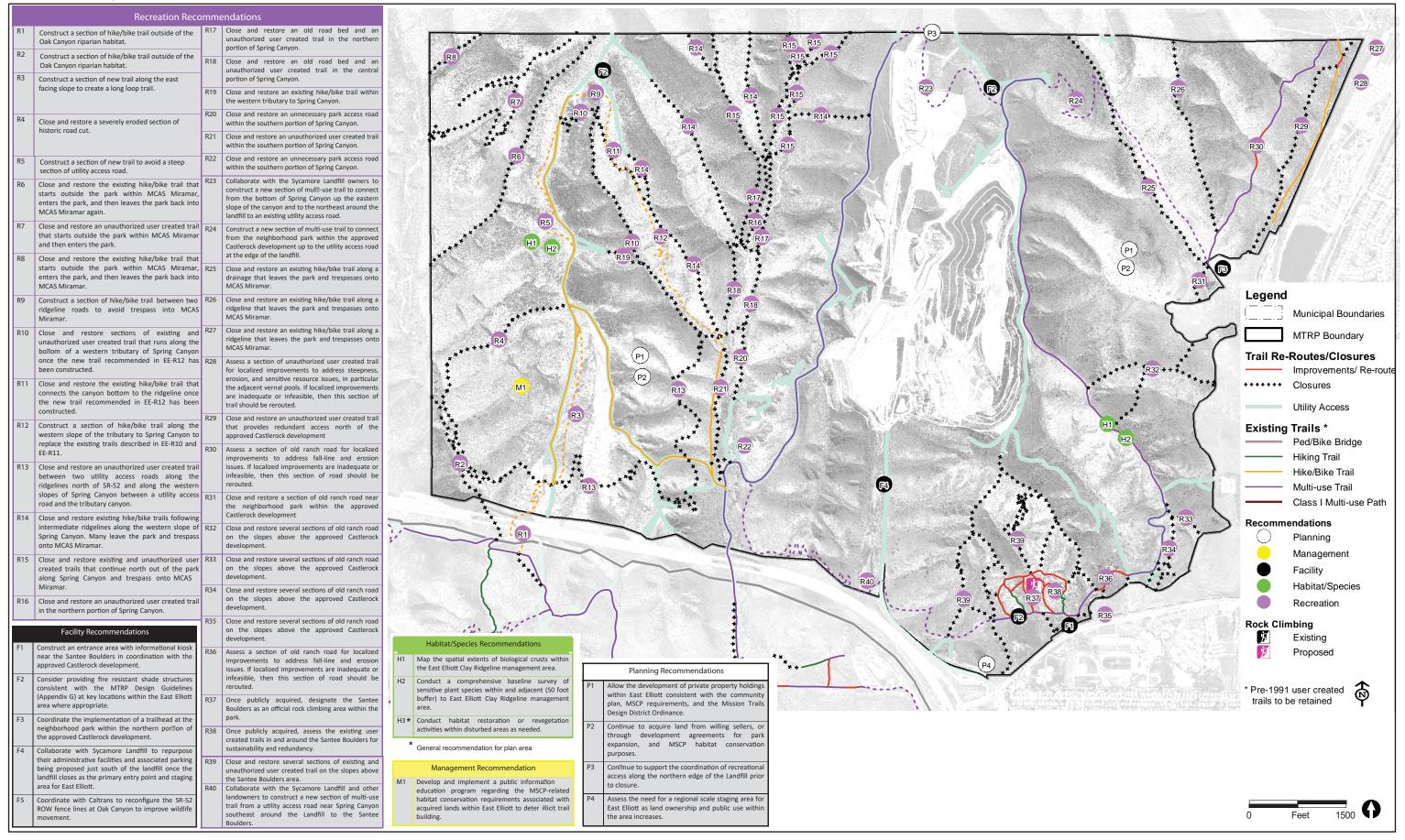


FIGURE 3-8

The current patchwork of public and private ownership throughout the East Elliott area makes implementation of many of the MPU recommendations difficult as existing and proposed trails cross both public and private property. Privately owned parcels would either need to be acquired or public access easements granted before those trails can be formally opened to the public for use.

f. West Sycamore

Figure 3-9 shows the planning recommendations for the West Sycamore area. Habitat and species preservation were the driving force behind the acquisition of the West Sycamore area. Public access and recreational use would be viewed as secondary uses. Recreational trails are identified as compatible uses within the MSCP, as long as they do not compromise the long-term ecological values of the area. Planning and implementing ecologically appropriate recreational trail loops is the focus of Park planning efforts within this area, as is connecting to adjacent County trail systems.

Multiple length trail loops are a key planning concept for this area to discourage continued recreational trespass into MCAS Miramar that is currently highly prevalent within West Sycamore Canyon. Multiple connections with Goodan Ranch, Sycamore Canyon Preserve, and Beeler Canyon would significantly contribute to this concept. Lastly, providing east-west connectivity for the County of San Diego's Trans-County Trail is a priority.

The West Sycamore area currently contains several utility access roads, a few old ranch roads and fire breaks, and several miles of newly constructed trails. The utility access roads are primarily located along the ridgelines and are being jointly used as recreational trails.

3.2.3 Natural Resources Management Plan

The NRMP was prepared in order to fulfill the City's MSCP requirement to develop Area-Specific Management Directives (ASMDs) for the protection of natural resources at the Park. The Park is a core biological resource area and regional wildlife corridor within the MSCP's MHPA. The NRMP is analyzed in detail in Section 5.4, Biological Resources; however, an overview is provided below.

3.2.3.1 Objectives

The specific objectives of the NRMP are to:

- Update sensitive species and habitat mapping.
- Develop management guilds (management units based on habitat groupings with similar life-history requirements and/or threats) for groups of species and/or habitats.
- Identify and prioritize threats to sensitive species and habitats.
- Document current understanding of natural systems and species life history requirements using conceptual models.



Planning Recommendations		
P1	The eastern slopes of West Sycamore should remain in their near-natural state, due to the sensitive visual character of the area.	
P2	Continue to coordinate with the County of San Diego on the implementation of the Trans-County Trail and designate one or more sections of trail through the West Sycamore area as required to provide east-west connectivity	

	Facility Recommendations
F1	Provide a restroom, ranger station, hitching posts, shade structure, and picnic tables at the West Sycamore staging area.
F2	Acquire an access easement near the intersection of Beeler Canyon Road and Sycamore Canyon Road and construct a trailhead with informational kiosk.
F3	Consider providing fire resistant shade structures consistent with the MTRP Design Guidelines (Appendix G) at a central location within the West Sycamore area where appropriate.

		Habitat/Species Recommendations
	H1	Plan and implement a removal and control program for Artichoke Thistle.
	H2	Manage the density of woody and herbaceous vegetation within Coastal Cactus Wren management areas.
	НЗ	Remove exotic weeds from the Coastal Cactus Wren management areas.
	H4	Transplant prickly pear and cholla cactus pads into the Coastal Cactus Wren management area to increase the density and quality of cactus wren habitat.
	H5	Conduct habitat restoration or revegetation activities within disturbed areas as needed.

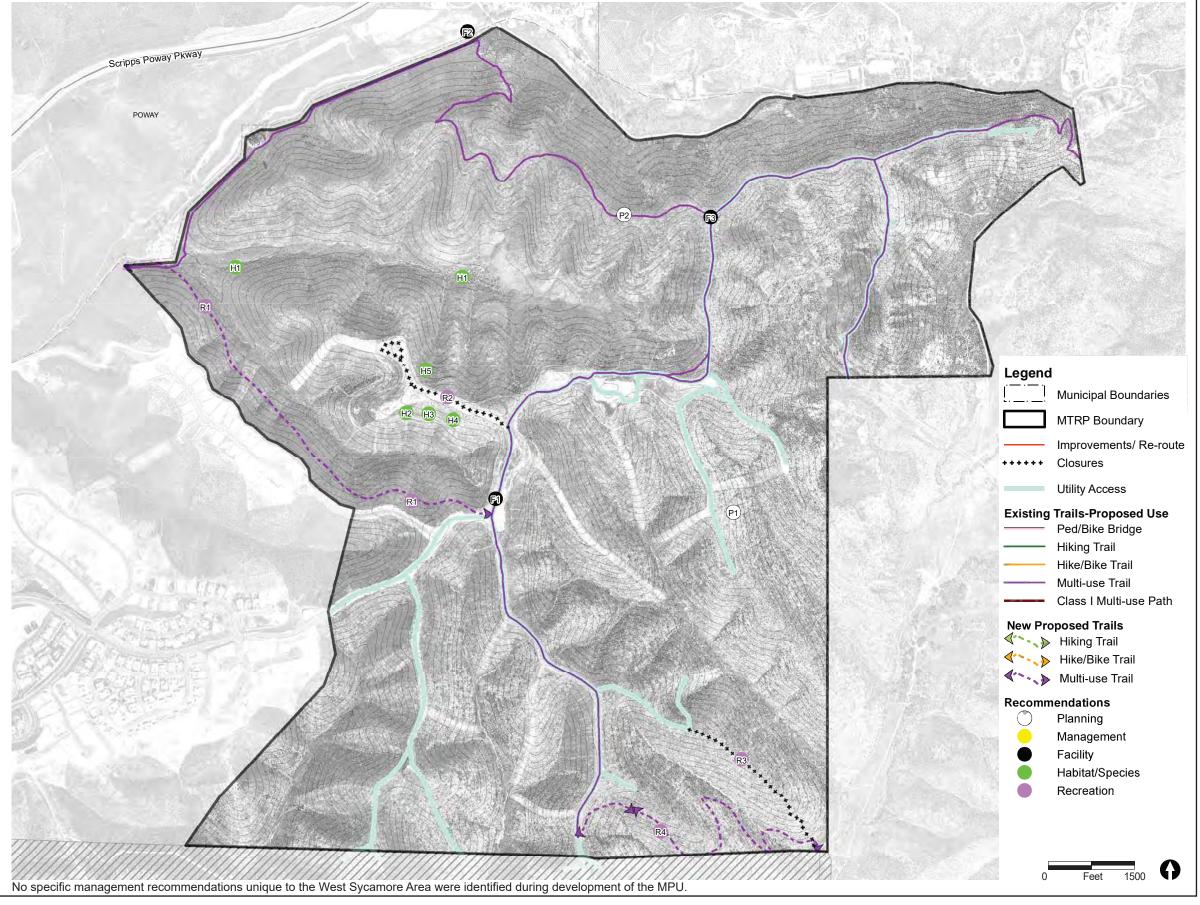


FIGURE 3-9

- Develop conservation and enhancement goals for individual populations/habitats and/or management guilds based on MSCP conditions of coverage.
- Develop specific management actions (e.g., ASMDs) within an adaptive management framework to address the identified threats and ensure long-term, viable populations of these species within the Park.
- Develop protocols (e.g., data collection methods, success criteria) to evaluate adaptive management techniques and projects proposed in this plan.

3.2.3.2 Adaptive Management

As previously detailed, the NRMP includes the existing biological conditions of the Park in order to inform the adaptive management recommendations. The NRMP then developed an adaptive management approach, which is a systematic process for managing natural resources in the face of uncertainty (i.e., when best management practices are lacking) and continually improving management policies and practices by learning from the outcomes of operational procedures. If operational procedures are not meeting management goals, methods are adjusted until they are achieved. Adaptive management of the Park consists of the following key elements: establishment of management goals, identification of threats, assessment and selection of techniques, implementation of management actions, monitoring/assessment of management action effects, and periodic review of management goals and restoration methods.

3.2.3.3 Management Prioritization

A prioritization system for management actions was developed for sensitive species and habitats (i.e., ecological guilds) at the Park using survey data, information gleaned from a thorough literature review, and the combined knowledge of City Biologists and Park Rangers, members of the Institute of Ecological Monitoring and Management at SDSU, and RECON biologists.

The sensitive species and ecological guilds were prioritized using the following criteria:

- 1. Region-wide threat level (e.g., habitat loss, urban runoff, drought, and utility/service lines)
- 2. Preserve threat level (e.g., human use of reserves, invasive/exotic species, altered fire regime, altered hydrology, habitat fragmentation)
- 3. Ability to effectively manage threats at the Park

Using this the above criteria, the priority sensitive species identified by the NRMP are:

- San Diego thornmint
- San Diego ambrosia
- variegated dudleya
- willowy monardella
- coastal cactus wren

The priority management ecological guilds identified by the NRMP are:

- river terrace grasslands
- Tierrasanta clay ridges
- East Elliott clay ridgelines
- riparian woodlands
- cliffs and rock outcrops
- Artemisia-dominated coastal sage scrub

The NRMP provides detailed descriptions of each of these species and guilds, anthropogenic threats, management goals and objectives, monitoring actions, and minimization measures to employ during management and monitoring in order to avoid incidental impacts.

3.3 Project Implementation

3.3.1 Prioritization

Implementation of the actions and recommendations contained in the Plans would continue to require coordination between City of San Diego Parks and Recreation Department Open Space Division, the Park's CAC and Task Force, other non-profit organizations, and interested stakeholders.

The order of implementation priorities for the park should generally be: (1) maintenance and repair of existing facilities and trails; (2) enhancement of existing facilities and trails; and (3) construction of new facilities, trails, and/or access to new areas within the Park. However, potential funding sources may alter the order of priorities.

The CAC would continue to identify and prioritize subsequent projects for development that are consistent with the MPUPlans. Ad-hoc subcommittees, composed of CAC members, park rangers, City staff, and other interested stakeholders, would collaborate as appropriate to guide the recommendations of the Plans from concept through implementation. Recommendations for project implementation would continue to be made by the CAC and routed to the Task Force for final approval recommendation to the Director of the Parks and Recreation Department. Decisions of the Task Force are final unless City Council action is required.

Management actions within the NRMP are tied to requirements set forth in the MSCP. As such, their implementation and maintenance, as well as those recommendations within the MPU that support the NRMP, would take precedence, both from a funding and scheduling perspective, over other recommendations contained in the MPU that are more discretionary in nature. While some of the recommendations within the MPU are intended for near-term implementation (one to two years), most are looked at as mid- (three to five years) or long-term (more than five years) projects in recognition of economic conditions and staffing levels.

City staffing levels at the Park will fluctuate over time with the City's budget and broader economy. Reductions in staffing make ongoing maintenance of existing improvements—while still providing support for other day-to-day management activities, public programs, and public safety—more difficult. When overall Park management responsibilities exceed staffing resources, initial priority

would be given to day-to-day management activities, such as patrols and enforcement. Priority would then be given to efforts that maintain compliance with MSCP requirements, and finally to projects that reduce existing maintenance efforts over those that would create new improvements and increase maintenance responsibilities.

Structured partnerships with recreation-focused nonprofit organizations would play a crucial role in the long-term implementation and maintenance of improvements within the Park. Developing and maintaining an open dialog and collaborative atmosphere between park rangers, City staff and these groups is essential. Volunteers play a significant role as trail maintenance crews, visitor center staff, and interpretive program docents.

3.3.2 Funding

Funding to implement the actions and recommendations contained in the Plans would come from public and private sources. Numerous grants may be available from federal, state, local and private entities to provide assistance with implementation. The <u>MPU-Plans</u> details numerous federal and state grant opportunities available for subsequent project implementation.

3.3.3 Implementation

The Plans would be implemented through subsequent projects, requiring a variety of discretionary and ministerial actions. These subsequent projects (i.e., trails, parking areas, restoration projects) are referred to as future development or future projects in the text of the PEIR. A non-exclusive list of regulatory actions required for future implementing activities is shown on Table 3-2.

The trail recommendations contained within the MPU would be conducted in a phased approach based on multiple objectives, including resource protection value, staffing capacity, complexity of implementation, and available funding. One or more phases would be implemented in a given year. The MPU identified over 35 miles of official and unauthorized trails to close over time. The distribution of trail closures across each area of the Park is: Lake Murray - 0.34-mile, Cowles Mountain - 6.29 miles, Mission Gorge - 1.36 miles, Fortuna Mountain - 6.58 miles, East Elliott - 20.36 miles, West Sycamore - 0.80 mile. The first few phases of implementation would be focused on a series of prioritized trail closures and restoration throughout the Park prior to the implementation of new trail construction. Each area of the Park has been assessed to identify one or more phases of trail closures to be conducted in conjunction with the ability to implement new trails. The first phase or two of trail closures in each area are prioritized as part of the MPU; however, the subsequent phases can be adapted to fit Park needs over time and may be re-sequenced as necessary.

Table 3-2 Future Permit Approvals/Regulatory Actions

City of San Diego Actions

- Site Development Permits
- Right of Entry permits for maintenance by an entity other than the City

Federal Actions

- Section 404 Permits
- U.S. Fish and Wildlife Service Section 7 or 10 (a) Take Authorization

State of California Actions

- Caltrans Encroachment Permits
- Section 1602/1603 Streambed Alteration Agreements
- Caltrans 2081 Memorandum of Understanding for State Endangered Species
- Water Quality Certification Determination for Compliance with Section 401

Other Agency Consultation/Actions

- Consultation with SDG&E and SDCWA for work within easements
- Air Pollution Control District Authority to Construct/Operate
- Consultation with County of San Diego for work within County-owned or jointly owned land as detailed in Joint Powers Agreement O-18268.

4

Chapter 4 History of Project Changes

As stated in the Introduction to the Master Plan Update-MPU, the update was initiated "to reflect the current status of the park's development and the evolving requirements of environmental protection" and address "the acquisition and potential acquisition of additional property within East Elliott and the inclusion of property within West Sycamore." The Natural Resources Management Plan (NRMP) and MPU (collectively, the Plans for the Mission Trails Regional Park Park have been developed as an integrated set of management guidelines for the Park, with the NRMP focusing on the natural, cultural, and historical resources and the MPU focusing on public access and recreation. The Plans have been developed under the direction of an ad hoc subcommittee of the Mission Trails Regional Park Citizens' Advisory Committee (CAC) with consultation from state and federal resource agencies. The following is a summary of the development of the Plans.

4.1 Overview of Master Plan Update and History of Project Changes

In 2007, an ad hoc subcommittee CAC began a process to update the 1985 Master Plan. In preparing an update to the Master Plan, one of the goals was to address the Multiple Species Conservation Program requirement for development of a NRMP. In November 2010, the City of San Diego (City) initiated work to prepare the MPU and NRMP.

In 2011, three public workshops were held to receive input from participants. Based on input received during the first workshop, draft alternatives were developed. These alternatives were presented at a second public workshop. Additional input on project alternatives was received through an online web survey. A draft plan was presented at the third workshop. This effort was followed by working meetings with City staff to review trail proposals resulting from the public workshops related to day-to-day Park management, habitat protection and fragmentation, sensitive species avoidance and encroachment, and cultural resource protection. Multiple meetings with the resources agencies and two site visits were also conducted. This planning effort resulted in a draft

plan which was released for input in November 2013. A Notice of Preparation meeting was held in April 2014.

Since the Notice of Preparation <u>scoping</u> meeting in 2014, the City received additional input on the plan recommendations from the resources agencies and other stakeholders. Multiple meetings and three additional site visits were conducted with the resources agencies to address their concerns regarding habitat fragmentation and wildlife corridors.

A revised draft MPU and NRMP were prepared and released in April 2016 and presented to the CAC and Task Force in May. The primary areas of change involved the location of both new proposed trails as well as trail closures. The plan areas most affected include Cowles Mountain, Fortuna Mountain, East Elliott, and West Sycamore. Within Cowles Mountain some additional trail closures were identified, as well as a major re-route of one proposed trail. Within Fortuna Mountain numerous additional trail closures were identified, as well as major re-routes of the proposed trails on the north-side of Fortuna Mountain. Within East Elliott numerous additional trail closures were identified, as well as major re-routes of all proposed trails. Within West Sycamore some additional trail closures were identified, as well as the elimination of one proposed trail.

Subsequent to distribution of the Draft PEIR for public review in January 2017, the City coordinated with the Wildlife Agencies and stakeholder user groups to identify two revised trail alignments in the East Elliott area of Mission Trails Regional Park (MTRP or Park) to address specific concerns related to the sensitivity of wildlife resources in the area. The trail alignment figures and applicable text within the MPU, NRMP and Draft PEIR have been revised accordingly to reflect these changes.

The first alignment identified in the Draft MPU and Draft PEIR for Oak Canyon was comprised of a combination of existing (1.23 miles) and proposed (2.09 miles) trails to create a 3.33-mile hike/bike trail from the SR-52 overpass, within the canyon along the western boundary of MTRP connecting at the north end to the utility access road along the ridgeline. The revised alignment incorporated into the Final MPU and Final PEIR has been relocated outside of the bottom of Oak Canyon and positioned adjacent to the ridgeline utility road. This newly revised alignment includes a combination of existing (0.62 mile) and proposed (1.60 miles) trails to create a 2.22-mile hike/bike trail.

The second alignment identified in the Draft MPU and Draft PEIR connected the Mast Boulevard parking and staging area, through Spring Canyon to the Boulders area east of the existing Sycamore Landfill and included a proposed 2.13 miles of multi-use trail from the utility access road in Spring Canyon eastward, traversing the terrain between the existing landfill and SR-52. While this area is a wildlife corridor, it is already disrupted by the existing Sycamore Landfill access road that generally runs north to south. Bounded by the landfill to the north and SR-52 to the south, this area functions as a wildlife corridor as noted in the Draft PEIR, as well as in prior environmental documentation for the landfill expansion and the extension of SR-52. The revised trail alignment relocates a portion of trail that extended around areas identified for mitigation for the expansion of the landfill, creating a more direct connection, parallel, but outside of the SR-52 right-of-way, and reduces not only the bisecting of the wildlife corridor, but also reduces the length of the proposed trail length in the East Elliott area by 16 percent, from 7.13 miles to 5.99 miles.

Subsequent to distribution of the Draft PEIR for public review in January 2017, the City amended Chapter 14: General Regulations of the San Diego Municipal Code (SDMC), adding Section 142.0151 - Paleontological Resources Requirements for Grading Activities, which applies to all projects that involve grading which could affect Paleontological Resources. SDMC Section 142.0151 assures that all future development would be required to screen for grading quantities and geologic formation sensitivity and apply appropriate requirements for paleontological monitoring. Regulatory compliance for future discretionary projects reviewed in accordance with CEQA would be assured through permit conditions, when applicable, or as notes on plans, and would be adequate to preclude impacts to paleontological resources. Because this amendment was adopted prior to finalizing the DEIR, Chapter 5.10 was revised to reflect the new regulatory compliance requirements. This new requirement does not change how projects are reviewed under CEQA, but merely provides the mechanism for ensuring that impacts would be reduced to below a level of significance with strict adherence to the Paleontological Resources, as required by the SDMC Section 142.0151.



Chapter 5 Environmental Analysis

The following analyses provide information relative to 13 environmental topics as they pertain to the Master Plan Update (MPU) and Natural Resources Management Plan (NRMP) (collectively, the Plans for the Mission Trails Regional Park Park. Each issue section is formatted to summarize the regulatory framework, environmental setting, list the criteria for the determination of significance, analyze any potential impacts, list the required mitigation measures, and summarize the level of significance after mitigation. The mitigation measures are presented as the mitigation framework. This sets forth a process that the City of San Diego (City) would require to be implemented by subsequent future projects in accordance with the Plans, except in the following cases:

- The mitigation measure is not applicable to the Project at hand; or
- Either the Project proponent offers alternative mitigation that reduces the significant impact to a similar level as would be achieved by the mitigation identified in the Program Environmental Impact Report (PEIR).

Topics subject to detailed analysis include those that were identified by the City as having the potential to cause significant environmental impacts, in addition to issues identified in the initial study and in response to the Notice of Preparation and scoping meeting as having potentially significant impacts. These topics are addressed in Chapter 5 and include the following:

- Land Use
- Visual Effects and Neighborhood Character
- Air Quality
- Greenhouse Gas Emissions
- Biological Resources
- Historical Resources
- Human Health/Public Safety/Hazardous Materials

- Hydrology and Water Quality
- Geology and Soils
- Paleontological Resources
- Transportation/Circulation
- Public Services
- Public Utilities

Topics that were determined by the City not to have potential significant impacts are addressed in Chapter 9, Effects Found Not to Be Significant.

5.1 Land Use

This section discusses the existing land uses within the study area and describes the potential land use impacts that would result from implementation of the Master Plan Update (MPU) and Natural Resources Management Plan (NRMP) (collectively, the Plans for the Mission Trails Regional Park Park. An analysis of the consistency of the Plans with the General Plan, Municipal Code, and relevant community plans or park plans is provided. Information has been obtained from applicable land use plans and ordinances approved by the City.

5.1.1 Environmental Setting

As previously detailed in Chapter 3, Project Description, the study area is made up of six areas: Lake Murray, Cowles Mountain, Mission Gorge, Fortuna Mountain, East Elliott, and West Sycamore. The study area is within three City community plan areas (CPAs) (Navajo, Tierrasanta, and East Elliott) and one Precise Plan (Rancho Encantada). A variety of land uses, as identified by the General Plan (City of San Diego 2008a), are included within the study area. They include Park, Open Space and Recreation, Residential, Institutional, and Public and Semi-Public Facilities.

5.1.2 Regulatory Setting

There are no federal or state land use regulations which pertain to the Project. Section 5.5, Biological Resources, addresses applicable regulations for federal and state protection of biological resources such as the federal and state Endangered Species Acts, or Section 404 of the Clean Water Act. Section 5.6, Historical Resources, addresses applicable regulations for federal and state protection of Historical Resources (e.g., historic built-environment, pre-historic, and historic archaeological resources), and tribal cultural resources. The City's land use regulations are detailed below.

5.1.2.1 General Plan

The General Plan was updated and adopted by City Council on March 10, 2008. The plan is primarily a policy document that sets goals and policies concerning the City and gives direction for growth and development. In addition, it outlines the programs that were developed to accomplish the goals and policies of the General Plan. General Plan Elements specifically address issues, concerns, and goals related to land use and community planning; recreation; conservation; urban design; historic preservation; and public facilities, services, and safety.

5.1.2.2 **Zoning**

The majority of the Park is zoned Agricultural-Residential (AR-1-1). The purpose of the AR zones is to accommodate a wide range of agricultural uses while also permitting the development of single

dwelling unit homes at a very low density (minimum 10-acre lots for AR-1-1). However, a majority of parkland is publicly owned and intended for parkland preservation. Fortuna Mountain and East Elliott include areas of residential zoning including RS-1-1 within the Fortuna Mountain area and RS-1-8 within the East Elliott area. The portion of the West Sycamore area containing the Sycamore Landfill and a portion of the East Elliot area are zoned Industrial-Heavy (IH-2-1).

5.1.2.3 Municipal Code

The Municipal Code regulates land use and development throughout the City. It is intended to be the means by which the land use policies in the General Plan are implemented. The Municipal Code identifies the uses that are allowed on parcels within the City. Chapters 11 through 15 of the Municipal Code are referred to as the Land Development Code (LDC). These chapters contain the City's zoning, subdivision, building, and permitting regulations. The LDC is one of the tools used to implement the General Plan and the various community plans, which establish land use throughout the City. Relevant provisions of the LDC are detailed below.

a. Environmentally Sensitive Lands Regulations

Chapter 14, Article 3 of the LDC contains the Environmentally Sensitive Lands (ESL) Regulations, which are intended to "protect, preserve and where damaged restore the environmentally sensitive lands of the City and the viability of the species supported by those lands" (City of San Diego 2013a/2018a). These regulations encourage a sensitive form of development and serve to implement the MSCP <u>Subarea Plan</u> by prioritizing the preservation of biological resources within the Multi-Habitat Planning Area (MHPA).

ESL Regulations apply to all proposed development when environmentally sensitive lands are present. ESLs include sensitive biological resources, steep hillsides, coastal beaches, sensitive coastal bluffs, and Special Flood Hazard Areas (SFHA). Sensitive biological resources, steep hillsides, and SFHA are present within the Park. Sensitive biological resources, as defined by the ESL Regulations, include those lands within the MHPA and other lands outside of the MHPA that contain wetlands, vegetation communities classified as Tier I, II, IIIA, or IIIB; habitat for rare, endangered, or threatened species; or narrow endemic species. The San Diego River is considered a SFHA as shown on the Flood Insurance Rate Map (FIRM) published by the Federal Emergency Management Agency (FEMA) and is subject to the ESL Regulations specified in Municipal Code Section 143.0145. See also Section 5.8.1.3 for additional discussion of development regulations for SFHAs.

ESL regulations [Municipal Code Section 143.0115(c)] require a development suitability analysis and land use plan to minimize impacts to ESL in accordance with the requirements of the Municipal Code and Land Development Manual when a Site Development Permit (SDP) is not requested concurrently with the processing of a project-specific land use plan. The proposed Plans would constitute the land use plan required by ESL Regulations. As specified in the Municipal Code Section 143.0115(c)(6), future projects within the Park subject to ESL Regulations would require a Process Four Site Development Permit and must be in conformance with the land use plan, in this case the MPU and NRMP, and must incorporate required mitigation. If not in conformance with the approved land use plan, the Site Development Permit would need to be in compliance with all ESL Regulations.

Some of the pertinent policies contained in the ESL Regulations include the following:

- Impacts to sensitive biological resources would be avoided and/or minimized.
- Impacts to wetlands would be avoided and a wetland buffer would be maintained to protect the functions and values of the wetland.
- All clearing, grubbing, or grading (inside and outside the MHPA) would be restricted during the breeding season where development may impact the following species:
 - o Southwestern willow flycatcher (Empidonax trallii extimus): May 1-August 30
 - o Least tern (Sternula antillarum browni): April 1–September 15
 - o Cactus wren (Campylorhynchus brunneicapillus sandiegensis): February 15-August 15
 - o Least Bell's vireo (Vireo bellii pusillus): March 15-September 15
 - o Coastal California gnatcatcher (*Polioptila californica californica*): March 1–August 15 inside the MHPA only; no restrictions outside the MHPA

b. Storm Water Runoff and Drainage Regulations

The Storm Water Runoff and Drainage Regulations (Chapter 14, Article 2, Division 2 of the LDC) regulate the development of, and impacts on, drainage facilities, to limit water quality impacts from development, to minimize hazards due to flooding while minimizing the need for construction of flood control facilities, and to minimize impacts on environmentally sensitive lands.

c. Historical Resources Regulations

The purpose of the Historical Resources Regulations (Chapter 14, Article 3, and Division 2) is to protect, preserve, and, where damaged, restore the historical resources of San Diego, which include historical buildings, historical structures or historical objects, important archaeological sites, historical districts, historical landscapes, and traditional cultural properties. These regulations are intended to assure that development occurs in a manner that protects the overall quality of historical resources and tribal cultural resources in accordance with Public Resources Code Sections 21080.3.1 and 21080.3.2 (Assembly Bill 52). The Historical Resources Regulations require that development affecting designated historical resources or historical districts would provide full mitigation for the impact to the resource as a condition of approval. If development cannot to the maximum extent feasible comply with the development regulations for historical resources, then a SDP or Neighborhood Development Permit (NDP) may be required.

The Historical Resources Regulations require that designated historical resources and traditional cultural properties be preserved unless deviation findings can be made by the decision-maker as part of a discretionary permit. Minor alterations consistent with the U.S. Secretary of the Interior's Standards are exempt from the requirement to obtain a SDP or NDP but must comply with the regulations and associated Historical Resources Guidelines. Limited development may encroach into important archaeological sites if adequate mitigation measures are provided as a condition of approval.

Historical Resources Guidelines, located in the Land Development Manual, provide property owners, the development community, consultants, and the general public explicit guidance for the management of historical resources located within the City's jurisdiction. These guidelines are designed to implement the Historical Resources Regulations and guide the development review process from the need for a survey and how impacts are assessed to available mitigation strategies and report requirements and include appropriate methodologies for treating historical resources located in the City.

5.1.2.4 Bicycle Master Plan

The City's Bicycle Master Plan, adopted in 2002 and updated in 2013, provides a framework for making cycling a more practical and convenient transportation option for a wide variety of San Diegans with different riding purposes and skill levels. The 2013 update to the Bicycle Master Plan presents a renewed vision for bicycle transportation, recreation, and quality of life in San Diego. The 2013 update evaluates and builds on the 2002 Bicycle Master Plan in light of the 2008 San Diego General Plan Update and reflects changes in bicycle user needs and changes to the City's bicycle network and overall infrastructure (City of San Diego 2013b).

5.1.2.5 Pedestrian Master Plan

The City's Pedestrian Master Plan City-Wide Implementation Framework Report was adopted in 2006 and includes a comprehensive analysis of each community's existing pedestrian conditions and needs. The subsequent phases of the Pedestrian Master Plan will identify pedestrian routes to activity centers and infrastructure improvement projects along these routes. The Pedestrian Master Plan will be a key resource and advantage for the City when seeking grant funding needed to implement pedestrian projects that promote pedestrian safety, walkability, mobility, and neighborhood quality.

5.1.2.6 San Diego River Park Master Plan

The San Diego River Park Master Plan was adopted in 2013 and provides the vision and guidance to restore the relationship between the river and the surrounding communities by creating a river-long park, stretching from the Pacific Ocean at Ocean Beach Park to the City's jurisdictional eastern boundary at the City of Santee.

To implement the San Diego River Park Master Plan, the following community plans were amended: Mission Valley, Navajo, Tierrasanta, and East Elliott. In addition, the following three sections of the Land Development Code were amended: Mission Valley Planned District (San Diego Municipal Code [SDMC] Chapter 15, Article 14, Division 3), Navajo Community Plan Implementation Overlay Zone (SDMC Chapter 13, Article 2, Division 14), and the Mission Trails Design District (SDMC Chapter 13, Article 2, Division 12). The CPIOZ is an implementing tool for the Design Guidelines of the San Diego River Park Master Plan as amended in the Navajo Community Plan River Park Subdistrict (SDMC Ch15, Art 3, Div 15 - DIAGRAM 132-14E, Navajo Community Plan Implementation Overlay Zone, reproduction of Map Nos. C-954 for illustration purposes only).

5.1.2.7 Mission Trails Design District

The Mission Trails Design District Ordinance provides design guidelines, subdivision, zoning, and other land use controls to ensure development is compatible with the edge of the Park. The ordinance was first adopted by the City in 1981. Revisions were approved in 2003 for changes to the design guidelines and boundaries; in 2013, revisions were approved to make the Mission Trails Design District consistent with the San Diego River Park Master Plan (City of San Diego 2013c). The Mission Trails Design District covers over 2,000 acres adjacent to the Park within the Navajo, Tierrasanta, and East Elliott communities. The intent of the Mission Trails Design District is to control development in these areas, adjacent to the sensitive areas around the Park, so as to be consistent with the goals of the Park. The overall policy is that new development should relate to the Park and existing landscaping in the Park.

5.1.2.8 City of San Diego Community Plans

The City has several Community Plans and a Precise Plan within the area covered by the Park. These plans act as "mini" General Plans and are intended to provide policy recommendations regarding future development specific to each community. The community plans that would require minor amendments with approval and implementation of the Plans are described below.

a. Tierrasanta Community Plan

The Tierrasanta Community Plan was adopted by the San Diego City Council on July 27, 1982, by Resolution No. 256890 and was last amended September 12, 1989May 20, 2013. The plan is intended to serve as a guide for future public and private development within the Tierrasanta community. The plan includes a series of goals and objectives established by the community that are consistent with Citywide policies (City of San Diego 2008b). Plan elements within the Community Plan include: Open Space, Community Facilities, Urban Design, and Transportation.

b. East Elliott Community Plan

The East Elliott Community Plan was adopted by the San Diego City Council on April 29, 1971, by Resolution No. 202550 and was last amended November 10, 2008 July 21, 2015. Because the majority of the East Elliott Community Plan area is designated for long-term open space use, the plan focuses largely on open space management guidelines. These guidelines are designed to foster preservation and enhancement of the natural open space areas that cover a majority of the planning area (City of San Diego 2008c), while still allowing for private development.

c. Navajo Community Plan

The Navajo Community Plan was adopted by the San Diego City Council on December 7, 1982, by Resolution No. 257606 and was last amended in June 2015. The overriding objectives for the long range development of Navajo are to retain the residential character of the area, provide adequate community services, establish guidelines for the utilization of canyons and hillsides, and enhance the environment of the area as a pleasant, livable, walkable community in which to live. The plan represents a policy framework that provides guidelines for public and private development (City of

San Diego 2015). The Community Plan provides CPIOZ policies and addresses Open Space Retention and Utilization, Public Schools, other Community Facilities, Transportation and Circulation, Public, and Community Environment.

d. Rancho Encantada Precise Plan

The Rancho Encantada Precise Plan was adopted by the San Diego City Council on August 7, 2001 by City Council Resolution R-295402 and has not been amended. The Precise Plan designates approximately 81 percent of the community for parks and open space, 18 percent for residential development, and 1 percent for an elementary school and institutional use. Because the majority of the Rancho Encantada Precise Plan area is designated for long-term open space use, the plan focuses largely on open space management guidelines. These guidelines are designed to foster preservation and enhancement of the natural open space areas that cover a majority of the planning area (City of San Diego 2001a).

5.1.2.9 City of San Diego Multiple Species Conservation Program Subarea Plan

The Multiple Species Conservation Program (MSCP) is a comprehensive habitat conservation planning program for 582,243 acres in southwestern San Diego County. The City's MSCP Subarea Plan was approved in March 1997 and encompasses 206,124 acres within the MSCP study area. The MSCP preserves a network of habitat and open space to protect biodiversity and enhance the region's quality of life. The MSCP provides an economic benefit by reducing constraints on future development and decreasing the costs of compliance with federal and state natural resource laws. Local jurisdictions, including the City, implement their portions of the MSCP through subarea plans, which describe specific implementing mechanisms providing a process for the issuance of permits under the federal and state Endangered Species Act and the California Natural Communities Conservation Planning Act of 1991. The primary goal of the MSCP Subarea Plan is to conserve viable populations of sensitive species and to conserve regional biodiversity while allowing for reasonable economic growth.

In July 1997, the City of San Diego signed an Implementing Agreement (IA) with United States Fish and Wildlife Service (USFWS) and the California Department of Fish and Wildlife (CDFW). The IA serves as a binding contract between the City, USFWS, and CDFW that identifies the roles and responsibilities of the parties to implement the MSCP and Subarea Plan. The agreement became effective on July 17, 1997, and allows the City to issue Incidental Take Authorizations (ITAs) under the provisions of the MSCP. Applicable state and federal permits are still required for wetlands and listed species that are not covered by the MSCP.

The MPU-study area <u>for the Plans</u> is located inside the approved boundaries of the City's MSCP Subarea Plan and as such, projects are required to comply with the general and specific management policies and directives included in Sections 1.5.2 and 1.5.6 of the City's MSCP Subarea Plan. Section 1.5.2 provides general management directives which apply to all areas within the MHPA. These general directives provide guidance on access and recreation within open space areas, including the Park. Section 1.5.6 of the Subarea Plan provides specific management policies and directives for the Eastern Area which includes East Elliott and the Park. Management priorities to be

undertaken by the City as part of its MSCP implementation requirements are also included in this section of the Subarea Plan. Those actions identified as Priority 1 are required to be implemented by the City as a condition of the MSCP Take Authorization to ensure that covered species are adequately protected. The actions identified as Priority 2 may be undertaken by the City as resources permit. In addition to implementation of the management priorities for the Eastern Area, the goals and polices, which have been incorporated into the Plans, are intended to achieve, maintain, and enhance biological diversity within the City's MHPA and ensure continued conservation of viable populations of endangered, threatened, and key sensitive specifies and their habitats in the Park.

a. Multi-Habitat Planning Area

The MSCP's MHPA includes regional wildlife corridors and core biological areas that are targeted for conservation. These lands have been determined to provide the necessary habitat quality, quantity, and connectivity to sustain the unique biodiversity of the San Diego region, and sensitive biological resources under the City's ESL Regulations. Conditionally compatible uses within the MHPA include passive recreation, utility lines and roads, limited water facilities and essential public facilities, limited low-density residential use, brush management zone 2, and limited agriculture (MSCP Subarea Plan Section 1.4.1). The majority of lands at MTRP are located within the MHPA (NRMP Figure 3-1).

Private land wholly within the MHPA is allowed only up to 25 percent development in the least sensitive area per the City's MSCP Subarea Plan. Should more than 25 percent development be desired, an MHPA boundary line adjustment may be proposed. The City's MSCP Subarea Plan states that adjustments to the MHPA boundary line are permitted without the need to amend the City's Subarea Plan, provided the boundary adjustment results in an area of equivalent or higher biological value. To meet this standard, the area proposed for addition to the MHPA must meet the six functional equivalency criteria set forth in Section 5.5.2 of the Final MSCP <u>Subarea</u> Plan. All MHPA boundary line adjustments require approval by the Wildlife Agencies and the City.

For parcels located outside the MHPA, there is no limit on the encroachment into sensitive biological resources, with the exception of wetlands, and listed non-covered species' habitat (which are regulated by state and federal agencies) and narrow endemic species. However, impacts to sensitive biological resources must be assessed and mitigation, where necessary, must be provided in conformance with the City's Biological Guidelines.

The boundary of the MHPA within a specific parcel may be revised through an MHPA Boundary Line Adjustment to accommodate additional development and requires approval from the City, CDFW, and USFWS. An analysis for an adjustment of the MHPA boundary would be required to evaluate and compare the relative biological value of the areas proposed for removal from the MHPA with those proposed for inclusion into the MHPA (lands within the MHPA would be replaced at a 1:1 ratio). This evaluation requires assessing the potential effects on various parameters related to the function of the MHPA preserve system.

- Effects on significantly and sufficiently covered habitats (i.e., the exchange maintains or improves the conservation, configuration, or status of significantly or sufficiently conserved habitats).
- Effects to covered species (i.e., the exchange maintains or increases the conservation of covered species).
- Effects on habitat linkages and function of preserve areas (i.e., the exchange maintains or improves a habitat linkage or wildlife corridor).
- Effects on preserve configuration and management (i.e., the exchange results in similar or improved management efficiency and/or protection for biological resources).
- Effects on ecotones or other conditions affecting species diversity (i.e., the exchange maintains topographic and structural diversity and habitat interfaces of the preserve).
- Effects to species of concern not on the covered species list (i.e., the exchange does not significantly increase the likelihood that an uncovered species will meet the criteria for listing under either the federal or state Endangered Species Acts).

b. Multi-Habitat Planning Area Land Use Adjacency Guidelines

Portions of the MPU study area <u>for the Plans</u> occur within or immediately adjacent to the MHPA. Lands within the MHPA have been determined to provide the characteristics necessary (e.g., habitat quality, quantity, and connectivity) to support the sensitive biological resources found in San Diego.

To address the integrity of the MHPA and mitigate for indirect impacts to the MHPA, guidelines were developed to manage land uses adjacent to the MHPA. Implementation of the adjacency guidelines would be addressed on a project-by-project basis and be considered during the planning, development, and/or management stages to minimize impacts and maintain the function of the MHPA. The issues to be considered during the project review stage consist of drainage, toxics, lighting, noise, barriers, invasives, brush management, and grading/land development. The MHPA Land Use Adjacency Guidelines are intended to be incorporated into the Mitigation Monitoring and Reporting Program and/or applicable permits during the review of a subsequent project implemented in accordance with the adopted MPUPlans. Compliance with the MHPA Land Use Adjacency Guidelines, which address potential indirect effects on the MHPA is required for all projects.

c. MSCP Subarea Plan: General MHPA Guidelines for the Eastern, Northern, and Urban Areas

The City's general MHPA Guidelines as described in Section 1.2.2 of the City's MSCP Subarea Plan and identifies specific guidelines applicable to the Eastern Area which includes the Park and East Elliott. The eastern edge of this area forms the San Diego border with the City of Santee. Specific MHPA Guidelines (B2 through B14) for these two areas are further described in the MSCP Subarea Plan.

The Lake Murray portion of the MPU Plans is part of the Urban Habitat Areas of the MHPA. Section 1.2.3 Urban Areas, describes urban habitat areas as primarily concentrated in existing urbanized locations, consisting of canyons with native habitats in relative proximity to other MHPA areas providing habitat. The finger canyons surrounding Lake Murray consist of coastal sage scrub, coastal sage scrub/chaparral, riparian/wetlands, and grasslands.

The West Sycamore Expansion area is included in the Northern Area (Section 1.2.4) which is largely comprised of regional linkages leading to biological core areas within existing reserves and parks. MHPA Guidelines C27 and C28 specifically address the West Sycamore Expansion Area.

d. MSCP Subarea Plan: Framework Management Plan – General Management Policies and Directives for the Eastern, Northern and Urban Areas

Section 1.5 of the MSCP Subarea Plan includes management goals and objectives for each area assuring the overarching goal of the MSCP to maintain and enhance biological diversity in the region and conserve viable populations of endangered, threatened, and key sensitive species and their habitats while allowing for reasonable economic growth.

In order to assure that the goal of the MHPA is attained and fulfilled, management objectives for the City of San Diego MHPA are as follows:

- To ensure the long-term viability and sustainability of native ecosystem function and natural processes throughout the MHPA.
- 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.
- 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.
- 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.
- To provide for flexible management of the preserve that can adapt to changing circumstances to achieve the above objectives.

Section 1.5.1 lists general management guidelines relevant to the entire City MHPA system and specific guidelines and recommendations for each planned area of the MHPA. Management directives are organized into the two priorities and intended to assist in the decisions on where to spend limited funds and direct mitigation efforts.

Section 1.5.2 provides general management directives applicable to all areas of the City's MSCP Subarea Plan as appropriate and include Mitigation, Restoration, Public Access, Trails and

Recreation, Litter/Trash and Materials Storage, Adjacency Management Issues, Invasive Exotics Control and Removal, and Flood Control.

Sections 1.5.6, 1.5.7, and 1.5.8 identify specific management policies and directives for the Eastern Area, Urban Habitat Lands, and the Northern Area. Major issues and priorities are further outlined in the Subarea Plan which require consideration for management in the MPU-project area for the Plans and during subsequent project review. The area-specific directives and policies have been incorporated into the Plans.

5.1.2.10 Other Agency NCCPs/HCPs

a. San Diego County Water Authority NCCP/HCP

On December 9, 2010, the Water Authority Board certified the Final EIR and approved the Natural Community Conservation Plan/Habitat Conservation Plan (NCCP/HCP). The NCCP/HCP and associated Implementing Agreement was subsequently signed by the Water Authority, CDFW, and USWFS. In December 2011 the Water Authority received a Natural Community Conservation Plan permit from the CDFW, and a federal fish and wildlife permit from the USFWS. Both permits have 55-year terms (SDCWA 2017)

b. San Diego Gas & Electric NCCP/HCP

SDG&E has an approved linear NCCP approved in 1995, extending from southern Orange County south to the Mexican border. The project area covers 110 plant and animal species and emphasizes avoidance of impacts. Mitigation required by the plan includes revegetation and use of up to 240 acres of credits set aside in land parcels purchased by SDG&E as mitigation banks.

5.1.2.11 Article IV, Section 55 of the San Diego City Charter

As set forth in Article—Section 55 of the San Diego City Charter, "the City Manager shall have the control and management of parks, parkways, plazas, beaches, cemeteries, street trees, landscaping of City-owned property, golf courses, playgrounds, recreation centers, recreation camps and recreation activities held on any City playgrounds, parks, beaches and piers, which may be owned, controlled or operated by the City" (City of San Diego 1975). The City Council shall by ordinance adopt regulations for the proper use and protection of these resources, which will be enforced by the City Manager. All real property owned in fee by the City or formally dedicated in the future "for park, recreation or cemetery purposes shall not be used for any but park, recreation or cemetery purposes without such changed use or purpose having been first authorized or later ratified by a vote of two-thirds of the qualified electors of the City voting at an election for such purpose" (City of San Diego 1975).

5.1.3 Significance Determination Thresholds

The determination of significance regarding any inconsistency with development regulations or plan policies is evaluated in terms of the potential for the inconsistency to result in environmental

impacts considered significant under California Environmental Quality Act (CEQA). Thresholds used to evaluate potential impacts related to land use are based on applicable criteria in the CEQA Guidelines Appendix G and the City of San Diego CEQA Significance Determination Thresholds (2016a). Thresholds are modified from the City's CEQA Significance Determination Thresholds to reflect the programmatic analysis for the Plans and associated discretionary actions. Impacts related to land use would be significant if implementation of the Plans and associated discretionary actions would:

- 1. Result in a conflict with the goals, objectives, and recommendations of the General Plan, the LDC, or the Tierrasanta, East Elliott, and Navajo Community Plans and Rancho Encantada Precise Plan:
- 2. Result in a conflict with the density calculations, design standards, use restrictions, and any other development regulations of the City's LDC related to the applicable zoning regulations and as a result, cause an indirect or secondary environmental impact to occur; or
- 3. Result in a conflict with adopted environmental plans, including the City's MSCP Subarea Plan and MHPA adopted for the purpose of avoiding or mitigating an environmental effect for the area.

5.1.4 Impact Analysis

Issue 1: Land Use Plan Conflict

Would implementation of the Plans and associated discretionary actions result in a conflict with the goals, objectives, and recommendations of the General Plan, the LDC, or the Tierrasanta, East Elliott, and Navajo Community Plans and the-Rancho Encantada Precise Plan?

The study area is within the neighborhoods of Rancho Encantada, Scripps Ranch, Tierrasanta, San Carlos, Lake Murray, and Del Cerro. It is also within the Rancho Encantada Precise Plan and the East Elliott, Tierrasanta, and Navajo CPAs of the City. To determine if any conflicts would occur with the land use designation, intensity of development, and environmental goals of these plans as a result of implementation of the Plans, a consistency analysis is presented with applicable goals, policies, and objectives from the General Plan, Municipal Code, and the Navajo, Tierrasanta, and East Elliott Community Plans, as well as the Rancho Encantada Precise Plan.

a. General Plan

The General Plan is a policy document that sets objectives and policies concerning the City and gives direction to growth and development. Included in the document are elements that specifically address issues, concerns, and goals related to land use and community planning; recreation; conservation; urban design; and public facilities, services, and safety. To determine if any conflicts would occur as a result of implementation of the Plans, a consistency analysis is presented in Table 5.1-1, with applicable goals from the General Plan.

Table 5.1-1 demonstrates that the Plans are consistent with the General Plan and would not conflict with any applicable General Plan goals. Therefore impacts would be less than significant.

Table 5.1-1 City of San Diego General Plan Consistency Analysis		
General Plan Goals	Consistency Discussion	Determination
Recreation Element	·	
Park and Recreation Guidelines		
A sustainable park and	The Park is one of the largest urban parks in the	Consistent
recreation system that meets	U.S. The Plans work together to promote a	
the needs of residents and	balance between the preservation of natural	
visitors.	open space in conformance with the MSCP	
	Subarea Plan and the varying demands for non-	
	motorized recreation by a diverse citizenry.	
An equitable citywide	The Park is located near the geographical center	Consistent
distribution of and access to	of the City and as a Regional Park with multiple	
parks and recreation	access points would continue to provide for the	
facilities.	equitable citywide distribution of and access to	
	parks and recreation facilities.	
Recreation Opportunities		
A City with park and	The Park is currently approximately 5,830 acres.	Consistent
recreation facilities and	Adoption and implementation of the Plans would	
services that are designed to	add an additional 2,590 acres in the East Elliott	
accommodate the needs of a	area and 1,360 acres in the West Sycamore area	
growing and diverse	in response to the needs of a growing and diverse	
population and respect the	population.	
City's natural landforms.		
A regional and citywide	The Plans envision the Park as a place that all San	Consistent
parks/open space system,	Diego residents and visitors can come to enjoy	
including the bays, beaches,	the experience of the natural attractions that the	
rivers, and other attractions	City has to offer.	
that gives our region identity,		
attracts tourism and enriches		
the quality of life for		
residents and visitors.		
A City with a diverse range of	The Plans recommend and guide a balance of	Consistent
active and passive	resource preservation with improved	
recreational opportunities	management and facilities for recreational	
that meet the needs of each	opportunities.	
neighborhood/ community		
and reinforce the City's		
natural beauty and		
resources.		

Table 5.1-1 City of San Diego General Plan Consistency Analysis		
General Plan Goals	Consistency Discussion	Determination
Preservation		
Preserve, protect and enhance the integrity and quality of existing parks, open space, and recreation programs citywide.	The Plans seek to connect the expansion areas with the existing areas of the Park in order to extend a comprehensive management approach to a broad and diverse area, preserving and protecting resources to enhance the quality of the Park experience for all visitors.	Consistent
Accessibility		
A park and recreation system that provides an equitable distribution of park and recreation facilities that are designed to accommodate the needs of a diverse population.	Adoption and implementation of the Plans would expand the boundaries of the Park to accommodate the needs of a growing population. The recognition of a need to balance resource protection with active and passive recreation activities strives to meet the needs of a diverse population.	Consistent
Park and recreation facilities that are sited to optimize access by foot, bicycle, public transit, automobile, and alternative modes of travel.	A unique aspect of the Park is that it for the most part is a rugged natural wilderness park within the midst of a large metropolitan area. The addition of the East Elliott and West Sycamore areas would increase the Park acreage from 5,830 acres to approximately 9,780 acres. Located only 8 miles northeast of downtown San Diego, it is accessible by automobile, bicycle, trolley, bus, and on foot with multiple points of entry and destinations within the Park.	Consistent
Provision of an inter- connected park and open space system that is integrated into and accessible to the community.	As noted above, the increase in Park acreage will interconnect areas of the Park to the north with those in the south and will further integrate the Park into the surrounding urban area.	Consistent

Table 5.1-1		
General Plan Goals	an Diego General Plan Consistency Analysis Consistency Discussion	Determination
Open Space Lands and Resource-based Parks		200011111111111111111111111111111111111
An open space and resource-based park system that provides for the preservation and management of natural resources, enhancement of outdoor recreation opportunities, and protection of the public health and safety.	The Plans were specifically prepared so that the City could better preserve and manage the natural resources of the Park while promoting recreational uses and protecting public health and safety.	Consistent
Preservation of the natural terrain and drainage systems of San Diego's open space lands and resource-based parks.	The Park is the ideal resource-based park within the City. The Plans value the preservation of the natural open space, including the terrain and drainage systems, of the Park.	Consistent
A system of pedestrian, bicycle, and equestrian paths linking communities, neighborhoods, parks, and the open space system.	The MPU recommends establishing a framework for identifying unsafe or unsustainable sections of recreational trails that will provide guidance for the types of management actions required. The goal is for a sustainable network of pedestrian, bicycle, and equestrian trails that will connect the trailheads within each of the communities adjacent to the Park.	Consistent
Conservation Element		
Open Space and Landform Prese	rvation	
Preservation and long-term management of the natural landforms and open spaces that help make San Diego unique.	The NRMP was prepared in order to fulfill the City's MSCP <u>Subarea Plan</u> requirement to develop ASMDs for the protection of natural resources at the Park. The Park is a core biological resource area and regional wildlife corridor within the MHPA. As such, preservation and long-term management of the natural landforms and open spaces within the Park is required and is a primary objective of the Plans.	Consistent
Urban Runoff Management	Urban Runoff Management	
Protection and restoration of water bodies, including reservoirs, coastal waters, creeks, bays, and wetlands.	The Plans have been prepared to be compatible with the San Diego River Master Plan. All water bodies are considered to be sensitive and will be protected and preserved.	Consistent

Table 5.1-1		
City of San Diego General Plan Consistency Analysis		
General Plan Goals Biological Diversity	Consistency Discussion	Determination
Preservation of healthy, biologically diverse regional ecosystems and conservation of endangered, threatened, and key sensitive species and	The NRMP identifies specific management actions to protect biodiversity and endangered, threatened, and key sensitive species and their habitats.	Consistent
their habitats.		
Wetlands Preservation of San Diego's rich biodiversity and heritage through the protection and restoration of wetland resources.	The Plans do not entail any actions or subsequent projects that would disturb wetland resources. They identify wetlands and the associated rich biodiversity as resources that should be restored, enhanced, and protected.	Consistent
Environmental Education		
Widespread public awareness of how the individual and cumulative actions of individuals, organizations, and businesses affect the environment.	Through the Plans, the Park will expand public awareness of the need to balance the preservation of natural resources and provide opportunities for recreation and will educate the public regarding the cumulative impacts that individuals, organizations, and businesses have on the environment, both positive and negative.	Consistent
Mobility Element	on the environment, both positive and negative.	
Walkable Communities		
A city where walking is a viable travel choice, particularly for trips of less than one-half mile.	The MPU promotes and encourages walking throughout the Park.	Consistent
A safe and comfortable pedestrian environment.	The MPU strives to maintain a safe and comfortable pedestrian environment through providing separation of pedestrian areas from motor vehicles and limiting equestrian and mountain bike use to certain roads and trails while promoting trail etiquette where equestrians yield to pedestrians and mountain bikers yield to both equestrians and pedestrians.	Consistent
A complete, functional, and interconnected pedestrian network, that is accessible to pedestrians of all abilities.	Much of the Park consists of steep, rugged terrain. The MPU encourages that wherever feasible, pedestrian walkways and trails be designed to be accessible to pedestrians of all abilities.	Consistent
Greater walkability achieved through pedestrian friendly street, site and building design.	The MPU encourages the development and maintenance of a sustainable trails network throughout the Park allowing for greater walkability.	Consistent

Table 5.1-1 City of San Diego General Plan Consistency Analysis		
General Plan Goals	Consistency Discussion	Determination
Bicycling		
A city where bicycling is a viable travel choice, particularly for trips of less than 5 miles.	The MPU will allow for the continued and enhanced use of the Park as a viable route and destination for cyclists.	Consistent
A safe and comprehensive local and regional bikeway network.	The MPU calls for the coordination with the San Diego Bicycle Master Plan and other current planning efforts to help create a safe bikeway network.	Consistent
Environmental quality, public health, recreation and mobility benefits through increased bicycling.	Implementation of the MPU would benefit the City's environmental quality, public health, recreation, and mobility by increasing bicycle access within the Park through the establishment of a trails management framework.	Consistent

b. Navajo Community Plan

The Navajo Community Plan discusses the importance of preservation of steep hillsides and open space. To determine if any conflicts would occur as a result of implementation of the Plans, a consistency analysis is presented in Table 5.1-2, with applicable objectives from the Navajo Community Plan. Table 5.1-2 demonstrates that the Plans are consistent with the Navajo Community Plan and would not conflict with any applicable Community Plan objectives. Therefore, impacts would be less than significant.

Table 5.1-2 Navajo Community Plan Consistency Analysis		
Community Plan Objectives	Consistency Discussion	Determination
Open Space Retention and L	Determination	
Designate and preserve open space before development takes place.	The Navajo CPA covers approximately 8,000 acres. Approximately 4,250 acres are undeveloped land, much of which has steep slopes. The Plans would be consistent with this policy as they provide the goals and guidelines preserving the Park's sensitive natural resources while allowing for recreational opportunities. Further, the Plans would not allow development beyond Park amenities.	Consistent

Table 5.1-2		
	ajo Community Plan Consistency Analysis	
Community Plan	Compietor au Discussion	Determination
Objectives	Consistency Discussion	Determination
Preserve, improve, and	Implementation of the Plans would include some	Consistent
reconstruct the wetlands	trail closures where they cross wetland habitats	
and riparian habitat areas in	and the MPU includes policies that support	
and along both sides of the	maintenance and enhancement of the wetlands	
San Diego River.	and riparian habitats along the river.	
Enhance and maintain the	The San Diego River Park Subdistrict has been	Consistent
aesthetic and recreational	established along the San Diego River, which runs	
qualities of the San Diego	through the Park, to return the river to the people	
River Corridor as part of the	and to bring back the health of the river and its	
open space system.	habitat. This is consistent with the Plans, which	
	provide the goals and guidelines for enhancement	
	of the recreational opportunities while preserving	
	the sensitive natural resources.	
Conserve the present	There are over 700 acres of scenic canyons,	Consistent
amenity of Navajo, Rancho	including Mission Gorge, which are dominant	
Mission, Mission Gorge, and	topographical features of the Navajo community.	
other canyons for the	The Navajo Community Plan recognizes that the	
enjoyment of this generation	open space element is designed to preserve the	
and as a legacy for	river, scenic canyon and hillside areas, and to link	
succeeding generations.	elements of the community.	
Establish and preserve a	The Plans have been prepared in conformance	Consistent
total open space system in	with the City's MSCP <u>Subarea Plan</u> to define Park	
perpetuity and guard against	boundaries, identify recreational and open space	
its commercialization.	opportunities, and preserve the natural	
Preserve the natural	environment.	
environment including		
wildlife, vegetation, and		
terrain.		
Permit only those uses	The Plans provide guidelines for compatible	Consistent
within the system that are	recreational amenities and trails within the Park,	
compatible with the open	with an emphasis on the protection and	
space concept.	preservation of natural resources and the	
	provision of recreational opportunities for a	
	diverse population.	
Ensure that any public	The Plans acknowledge the presence of utility	Consistent
improvements such as	easements and facilities throughout the Park and	
roads, drainage channels,	the need to accommodate utilities while ensuring	
and utility services, and any	compatibility with the objectives of the open space	
private lessee developments	and recreation use areas.	
be compatible with the		
objectives of the open space		
system.		

Table 5.1-2 Navajo Community Plan Consistency Analysis		
Community Plan Objectives	Consistency Discussion	Determination
Parks and Recreation		
Develop sufficient and convenient parks and recreation facilities to serve the existing and future population of the community.	The Plans address the expansion of the Park and the need to protect and preserve sensitive natural resources while providing recreation opportunities for a diverse population. Given the planned expansion areas of the Park, plans for future management, and the many communities that it serves through multiple access points, the community would be adequately served with regards to recreation needs.	Consistent
Develop pedestrian and bikeway linkages between open space, neighborhood and community parks, and other recreation and activity centers.	The Plans include guidelines for the improvement of existing trail networks that provide linkages between multiple neighborhoods that abut the Park and various recreation and activity centers within the Park and in the adjacent communities.	Consistent
Community Environment		
To preserve and enhance the natural beauty and amenities of the Navajo community.	The Park is a major amenity for the Navajo CPA and the region. The Plans strive to preserve and enhance the natural beauty of the Park.	Consistent

c. Tierrasanta Community Plan

The Tierrasanta Community Plan specifically acknowledges the presence and importance of the Park. In 1976, the City adopted the boundaries for the Park, bisecting the original "Elliott CPA" into two distinct sections. The Park and the newly developing section to the west were severed from the Elliott Community Plan, and a new planning area was formed with the adoption of the Tierrasanta Community Plan in 1982. The more rugged, remote section east of the Park is now known as the East Elliott CPA, discussed below.

The inclusion of extensive areas of natural open space has played a considerable role in shaping the form of development within Tierrasanta. The Park comprises approximately half of this CPA, and the San Diego River roughly forms the southerly boundary of the community. Canyon systems meander throughout the community, defining the transitions between individual development areas and interconnecting to the larger canyon systems. The vast majority of developable land in Tierrasanta has been built out and is devoted to residential uses, with several small commercial centers scattered throughout the community and light industrial near the intersection of Interstate 15 and State Route 52.

To determine if any conflicts would occur as a result of implementation of the Plans, a consistency analysis is presented in Table 5.1-3, with applicable objectives from the Tierrasanta Community Plan.

Table 5.1-3 demonstrates that the Plans are consistent with the Tierrasanta Community Plan and would not conflict with any applicable Community Plan objectives. Therefore, impacts would be less than significant.

Table 5.1-3 Tierrasanta Community Plan Consistency Analysis		
Community Plan Objectives	Consistency Discussion	Determination
Community Facilities		
To encourage a full range of recreational facilities distributed throughout the community to serve children, youth, and adults.	The Plans address the protection and preservation of sensitive natural resources and the development of recreation facilities to serve a diverse population. With several primary access points within the Tierrasanta community and recommendations for an improved trails network, the children, youth, and adults of Tierrasanta will continue to be provided with	Consistent
Urban Design	recreational opportunities within the Park.	
To protect and enhance the physical environment, visual appearance, identity and character of the Tierrasanta community through aesthetic improvements and careful urban design.	The physical appearance, visual appearance, and identity and character of the Park are primarily that of undeveloped natural open space, which carries over and contributes to a similar character theme in the more developed areas of Tierrasanta. The Plans contain guidelines for trails and recreational amenities within the Park that will be compatible with the existing natural and built environment.	Consistent
To provide a functional community which has maximum linkages between public places, and which promotes social cohesion and civic pride.	The Plans balance the protection and preservation of sensitive natural resources with the provision of recreational opportunities for a diverse population. Linkages with the Tierrasanta community will be preserved, and, where feasible and desirable, enhanced.	Consistent
To provide public improvements which enhance the community both functionally and aesthetically.	The Plans provide guidelines for future improvements within the Park. Function and aesthetics are to be considered for all future improvements.	Consistent
Transportation To provide a podestrian	The Plans provide guidelines for improving the	Consistent
To provide a pedestrian pathway system utilizing City open space and right-ofways, and linking neighborhoods and activity centers.	The Plans provide guidelines for improving the existing trails network throughout the Park, which will continue to improve the linkages between neighborhoods and activity centers within and adjacent to the Park.	Consistent

d. East Elliott Community Plan

The East Elliott CPA is mostly within the boundaries of the MSCP/MHPA, with nearly 80 percent of the area in the Community Plan designated as Open Space. To determine if any conflicts would occur as a result of implementation of the Plans, a consistency analysis is presented in Table 5.1-4, with applicable open space management objectives from the East Elliott Community Plan. Table 5.1-4 demonstrates that the Plans are consistent with the East Elliott Community Plan and would not conflict with any applicable Community Plan objectives. Therefore, impacts would be less than significant.

Table 5.1-4 East Elliott Community Plan Consistency Analysis		
Community Plan Objectives	Consistency Discussion	Determination
Open Space Management		
Natural open space areas should	The Plans provide guidelines for the	Consistent
remain undeveloped with	protection and preservation of open	
disturbance limited to trails and	space while providing recreational	
passive recreational uses such as	opportunities for a diverse population.	
walking, hiking and nature study	Trails are to be rerouted where necessary	
that are consistent with	to protect natural resources and are to be	
preservation of natural resources.	consistent with recreational uses.	
More active recreation uses,	The Plans acknowledge the need to	Consistent
including horseback riding and	provide recreational opportunities for a	
mountain biking, may also be	diverse population, including equestrians	
permissible if measures are	and mountain bikers. A trail system that	
taken to ensure that biological	includes trails for both of these user	
values are not threatened.	groups is to be maintained.	
Public access to limited areas of	The Plans include recommendations for	Consistent
particularly sensitive natural	the exclusion of all active uses from	
open space could be restricted.	particularly sensitive natural open space	
Examples of locations where	areas, including those areas that contain	
access could be controlled	vernal pools and nesting areas for	
include vernal pool areas and	endangered or threatened animal or bird	
identified nesting areas for	species.	
endangered or threatened		
animal or bird species.		
Transition areas should be	While this community plan objective is	Consistent
established between urban uses	intended to apply to land uses adjacent to	
and the open space system, along	but outside of the Park, the Plans also	
traffic corridors and canyon	recognize the importance of transition	
overlooks, where feasible and	zones and buffer areas between the Park	
appropriate. Such transition areas	and adjacent development.	
may be developed by providing		
additional maintenance and		
planting noninvasive grass, shrubs		
and trees that provide a sensitive		
transition between uses.		

e. Rancho Encantada Precise Plan

Rancho Encantada is a new community that is planned for limited residential development and is currently completing development. With the Rancho Encantada Precise Plan, 1,568 acres of land was conveyed to the MHPA within the West Sycamore area for purposes of habitat conservation. A total of 935 homes were planned for the 2,658-acre community. The community is defined by its rugged topography characterized by eroded ridges and canyons ranging in elevation from 600 feet in the west to 1,777 feet in the northeast. The community has been designed to protect the majority of the steep hillsides, canyons, and ravines by concentrating development along the upper elevations and in areas disturbed by the previous development (General Dynamics). The Rancho Encantada Precise Plan designates approximately 81 percent of the community for parks and open space, 18 percent for residential development, and 1 percent for an elementary school and institutional use.

To determine if any conflicts would occur as a result of implementation of the Plans, a consistency analysis is presented in Table 5.1-5, with applicable open space management objectives from the Rancho Encantada Precise Plan. Table 5.1-5 demonstrates that the Project is consistent with the Rancho Encantada Precise Plan and would not conflict with any applicable Community Plan objectives. Therefore, impacts would be less than significant.

Table 5.1-5 Rancho Encantada Precise Plan Consistency Analysis		
Precise Plan Objectives	Consistency Discussion	Determination
General		
Implement the MSCP <u>Subarea Plan</u> and ensure that development preserves the integrity of the MHPA.	The intent of the NRMP is to implement the MSCP <u>Subarea Plan</u> within the Park, which is a core area within the MHP. The MPU has been drafted to be consistent with both the NRMP and the MSCP <u>Subarea Plan</u> .	Consistent
Satisfy the existing contractual obligations to conserve approximately 1,150 acres in the eastern portion of the Precise Plan area as open space.	The Plans will incorporate the approximately 1,150 acres in the eastern portion of the Precise Plan into the Park and will designate them for preservation as open space.	Consistent

Table 5.1-5		
	Precise Plan Consistency Analysis	
Precise Plan Objectives	Consistency Discussion	Determination
Circulation		1
Although the Precise Plan does not	The MPU includes a park signage	Consistent
propose active recreational uses within	program that would support	
open space areas, pedestrian trails are	provision of clear signage. Various	
permitted uses in all areas designated as	MPU policies are proposed that	
open space, subject to the requirements	support development of trails and	
and restrictions of the City's MSCP	park amenities in the least sensitive	
<u>Subarea Plan</u> . <u>The Precise Plan</u>	areas of the MHPA, following	
envisioned trails within MHPA open	existing disturbed areas. The MPU	
space as shown on Figure 11, Master	includes various recommendations	
<u>Trail System in the Rancho Encantada</u>	for closure and restoration of	
<u>Precise Plan.</u> If trails are provided	existing trails within the West	
through MHPA open space, the following	Sycamore area consistent with the	
standards shall apply:	Rancho Encantada Precise Plan.	
a. Provide sufficient signage to clearly	Consistent with the Master Trail	
identify public access to the MHPA.	System plan provided in the	
	Rancho Encantada Precise Plan, the	
b. Locate trails, view overlooks, and	trail proposed within the West	
staging areas in publicly owned areas	Sycamore area extending onto	
and in the least sensitive areas of the	lands associated with the Goodan	
MHPA. Locate trails along the edges of	Ranch Sycamore Canyon Preserve	
urban development and follow existing	in the Precise Plan Master Trails	
dirt roads/trails and utility easements as	Plan is consistent with the MPU.	
much as possible.		
c. Trails should not be paved, and trail		
widths should be minimized, except for		
the streetscape trail.		
d. Existing jeep trails and firebreaks that		
are proposed to be included in the trail		
system will be converted to trails.		
Existing jeep trails that are not identified		
as trails within the Precise Plan area shall		
be naturally revegetated and will not be		
considered trails. Portions of existing		
firebreaks not identified as trails by the		
Precise Plan shall be artificially		
revegetated and will not be considered		
trails. Existing firebreaks located on the		
City-owned parcel will not be		
revegetated.		
Teregetatea.		

Issue 2: Development Regulations Consistency

Would implementation of the Plans and associated discretionary actions conflict with the density calculations, design standards, use restrictions, and any other development regulations of the City's LDC related to the applicable zoning regulations and as a result, cause an indirect or secondary environmental impact to occur?

Subsequent projects implemented in accordance with the Plans would not conflict with the applicable zoning regulations of the City's LDC. Subsequent projects contemplated by the MPU-Plans include trail improvements, picnic and shade areas, restrooms, parking areas, and interpretive overlooks; the NRMP identifies management actions that would also be considered subsequent projects, such as weeding, installation of exclusionary fencing, and biological surveys.

Zoning within the study area includes a mix of Agriculture, Open Space, Residential, Commercial, and Industrial designations. The Municipal Code's Residential zone allows passive recreation as the primary use. The Plans do not propose any changes to the current zoning.

Within the Agriculture, Open Space, and Industrial Zoning categories, passive recreation is allowed as the primary use. In the Commercial zone, passive recreation is not allowed as the primary use. Within all these zones, passive recreation can be allowed as an accessory use. Therefore, implementation of the Plans and associated discretionary actions would not conflict with the applicable zoning regulations, and impacts would be less than significant.

The MPU proposes to add two expansion areas to the Park—East Elliott and West Sycamore—that would bring the Park's total area to approximately 9,780 acres. However, future land acquisitions within the East Elliot area would be required in order to fully implement this area into the Park. Expansion of the Park's boundaries would occur within areas subject to the Mission Trails Design District Ordinance (MTDDO). The MTDDO (LDC Chapter 13, Article 2, Division 12) applies only to areas that have development potential, and provides design guidelines, subdivision, zoning, and other land use controls to ensure development is compatible with the edge of the Park. For Park expansion areas, (the West Sycamore area is 100 percent conserved with no development potential and as such, the MTDDO does not apply. Only privately-owned properties within the East Elliott area s), development within the areas surrounding these Park expansion areas would be subject to the supplemental regulations of the MTDDO as specified in Table 132-12A, Mission Trails Design District Applicability. Development subject to these regulations shall comply with the design criteria and standards of the Mission Trails Design Guidelines in the Land Development Manual. Implementation of the Plans would not conflict with the MTDDO because development surrounding existing Park areas would continue to be subject to these regulations. Additionally, development surrounding future Park areas would also be subject to these same regulations. Thus, implementation of the Plans and associated discretionary actions would not result in conflicts with the MTDDO and impacts would be less than significant.

In most cases, subsequent projects implemented in accordance with the Plans would be subject to discretionary review by the City, as well as project-level CEQA environmental review in accordance with CEQA Guidelines Section 15168. This would occur when applications to construct are submitted to the City for review pursuant to the provisions of the Land Development Code. Therefore, the

future development of facilities within the Park in compliance with the Plans would not be in conflict with the Municipal Code.

The SFHA and Storm Water Regulations within the LDC are analyzed within Section 5.8, Hydrology and Water Quality, of this Program Environmental Impact Report (PEIR). The Mitigation Framework outlined therein sets forth a process to ensure subsequent projects implemented in accordance with the Plans would comply with these regulations.

a. ESL Regulations

Environmentally sensitive lands (e.g., sensitive biological resources, steep hillsides, historical resources) occur within the proposed MPU area. Implementation of the Plans and associated discretionary actions would be subject to ESL Regulations where development would impact sensitive biological resources, steep hillsides, or SFHA. Policies and recommendations contained within the Plans would minimize impacts to ESL and any subsequent projects within the Park subject to ESL regulations would require a Process Four SDP that would require consistency with the Plans and incorporation of any required mitigation for impacts related to ESL (SDMC Section §143.0150).

Any future development proposed on environmentally sensitive lands would be subject to the City's ESL Regulations (Chapter 14, Article 3, Division 1), which require future projects demonstrate the proposed development site is physically suitable for the proposed use and that it would minimize disturbance to natural landforms and not increase flood hazards. In the event a subsequent project is considered for a deviation to the ESL Regulations, supplemental findings would be required prior to approval in order to show that development would not result in an additional public safety threat or extraordinary public expense, or create a public nuisance.

Pertinent policies contained in the ESL Regulations that are implemented and supported through proposed policies within the Plans include avoidance of any clearing, grubbing or grading within the breeding season of the southwestern willow flycatcher, least tern, cactus wren, least Bell's vireo, or coastal California gnatcatcher. Additionally policies within the Plans support avoidance and/or minimization of impacts to sensitive biological resources and wetlands and additionally support enhancement of habitat including any wetlands and riparian habitats. Thus, implementation of the Plans and associated discretionary actions would not conflict with ESL Regulations and impacts would be less than significant.

b. Historical Resources Regulations

Implementation of the Plans and associated discretionary actions would be subject to Historical Resources Regulations where development would have the potential to impact historical resources. As discussed in Section 5.6, Historical Resources, of this PEIR, the MPU includes management recommendations for protection of cultural resources while providing recreational opportunities. Subsequent projects implemented in accordance with the MPU-Plans and associated discretionary actions would be subject to discretionary review and further environmental review under CEQA, including compliance with Historical Resources Regulations, and would be reviewed in accordance with Mitigation Framework MM-HIST-1a and MM-HIST-1b in Section 5.6 Historical Resources. Thus implementation of the Plans and associated discretionary actions would result in a less than

significant impact related to consistency with Historical Resources Regulations and associated land use impacts would be less than significant.

Issue 3: Environmental Plan Consistency

Would implementation of the Plans and associated discretionary actions result in a conflict with adopted environmental plans, including the City of San Diego's MSCP Subarea Plan and MHPA adopted for the purpose of avoiding or mitigating an environmental effect for the area?

a. MSCP Subarea Plan

Overall recommendations contained within the MPU—Plans directly reflect goals of the MSCP Subarea Plan. For example, the MPU—NRMP contains a general recommendation to implements the a habitat and species-specific adaptive management recommendations contained in the NRMP framework to protect sensitive biological resources at the Park and includes a planning recommendation to implement and updates, the NRMP as required, to ensure continued compliance with the City of San Diego MSCP Subarea Plan. Thus, implementation of the Plans would directly support implementation of the MSCP Subarea Plan and potential impacts related to consistency with the MSCP Subarea Plan would be less than significant.

Areas within the Park boundaries where easements have been granted by the City to SDG&E and/or the SDCWA, are subject to their respective NCCPs/HCPs (see Section 5.1.2.10). Any proposed Park improvements within these areas would be subject to coordination with the respective agencies and consistency with the applicable NCCP/HCP and implementing agreement requirements.

b. MHPA Consistency

Land Use Compatibility

As designated in the Subarea Plan, the MHPA is the permanent preserve area for habitat conservation. Overall, the MHPA within the study area was configured to support sensitive habitats and significant populations of Subarea Plan covered species known to exist at that time.

The Plans are consistent with the designated MHPA preserve area and only propose subsequent projects that would be allowable within the MHPA as outlined in the MSCP Subarea Plan. Compatible land uses are outlined in Section 1.4.1 and Section 1.4.2 of the MSCP Subarea Plan and include: (1) existing uses, (2) public access and recreation, (3) infrastructure, scientific and biologic activities, and (4) emergency, safety and police services. The MSCP <u>Subarea Plan</u> provides specific requirements relating to the implementation of these allowed uses within the MHPA. The subsequent projects implemented under the Plans would either consist of public access/recreation projects (MPU) or scientific and biological activities (NRMP). Therefore, impacts related to land use compatibility within the MHPA would be less than significant.

Land Use Adjacency Guidelines

The MHPA has been designed to maximize conservation of sensitive biological resources, including sensitive species. When land is developed adjacent to the MHPA, there is a potential for secondary impacts that may degrade the habitat value or disrupt animals within the preserve area. These secondary effects of development may include habitat insularization, drainage/water quality impacts, lighting, noise, exotic plant species, nuisance animal species, and human intrusion. These impacts could be short-term resulting from construction activities, or long-term. Short-term construction impacts could result in disruption of nesting and breeding thus affecting the population of sensitive species. To address these concerns, the MSCP <u>Subarea Plan</u> includes a set of MHPA Land Use Adjacency Guidelines that are to be evaluated and implemented at the project level.

Indirect effects can occur wherever development and human activity is adjacent to natural areas. These effects include those due to increased runoff, trampling and removal of plant cover due to hiking, biking, and other human activities, increased presence of toxins, redirection or blockage of wildlife movement, or increased levels of non-native and invasive plants. These indirect effects could reduce the quality of the MHPA. Subsequent projects implemented in accordance with the Plans which are within and/or adjacent to the MHPA would be required to incorporate the MHPA Land Use Adjacency Guidelines (see Mitigation Framework LU-1 below) into the design of projects in order to reduce potential indirect impacts to the preserve from new development.

Management actions contemplated by the NRMP (such as weeding, revegetation, etc.) would not conflict with the MHPA Land Use Adjacency Guidelines. These actions have been developed to specifically enhance sensitive habitat for sensitive plant and wildlife species. No impact would occur. However, subsequent projects implemented in accordance with the MPU_Plans_would introduce additional recreational uses within or adjacent to the MHPA. Impacts from these future uses would be considered significant, and mitigation is required (Impact LU-1).

Management Directives

Section 1.5.2 of the City's MSCP Subarea Plan provides general management directives which apply to all areas within the MHPA. These general directives provide guidance on access and recreation within open space areas, including the Park. Priority directives include:

- Install sufficient signage and barriers identifying access to the MHPA
- Locate trails, overlooks, and staging areas in least-sensitive areas in MHPA
- Avoid paving trails
- Minimize recreational trail widths
- Limit equestrian trails near sensitive resources
- Prohibit recreational off-road and cross county access to MHPA
- Remove homeless camps from habitat areas
- Regularly maintain equestrian trails to remove manure

Sections 1.2.2, 1.2.4, 1.5.1, 1.5.6, and 1.5.8 of the City's Subarea Plan provide guidelines for MHPA compliance and specific management recommendations within the Park. MTRP management directives, required for the lifespan of the MPU and NRMP and developed in compliance with all relevant MSCP Subarea Plan directives, are incorporated into the MPU and NRMP as outlined below.

Priority 1 (MSCP required directives):

- 1) Prepare an NRMP for the Park to preserve and protect natural resources while encouraging public use and implementation of the Master Plan Update.
 - MPU: MSCP directive satisfied by implementation of MPU.
 - NRMP: MSCP directive partially satisfied by the completion of the NRMP.
- 2) Maintain and clearly demarcate trails around the visitor center and other areas of high public use to minimize habitat destruction.
 - High-use trails surrounding the Visitor Center are currently demarcated with signage and maintained by MTRP staff.
 - MPU: General Facility Recommendations #6— Maintain and repair existing signage on an as-needed basis.
 - MPU: General Habitat/Species Recommendations #3— Construct wildlife-compatible fencing where necessary to protect sensitive species, habitats, and cultural/historic resources.
 - MPU: General Habitat/Species Recommendations #6 Close unauthorized, user-created trails where appropriate to reduce habitat fragmentation and encroachment.
 - MPU: General Management Recommendation #13 Develop and implement a public information and education program focused on the requirements of the MSCP relative to the management and use of different areas of the Park.
- 3) Limit future equestrian trails to specified trails which minimize trail edge disturbances and are no greater than 25 percent gradient.
 - MPU: Proposed equestrian trails have been designed to minimize edge disturbances, and are no greater than 25 percent gradient.
 - MPU: Trails analysis discussion (pp. 4-12–13) regarding both steep and fall-line trails.
 - MPU: Recommendations introduction (p. 5-1) regarding MSCP requirements, safety, and sustainability as foundation for all recommendations.
 - MPU: General Recreation Recommendations #1— Comply with the City's current Trail
 Policies and Standards per the current City of San Diego Consultants Guide to Park Design
 and Construction for all new and rerouted trails. Utilize other state and national
 sustainable trail guidelines as supplements to the City's Standards.
- 4) Seasonally restrict, if necessary, areas along the San Diego River, including riparian restoration areas (except along established trails), to prevent disturbance of breeding areas.

- MPU: Recommendations introduction (p. 5-2): As additional environmental surveys are
 conducted and management actions implemented, conflicts between resource
 management objectives and recreational use may arise. When these conflicts are
 identified, temporary, seasonal, or permanent closures of the recreational use may be
 required. If permanent closure is required, then an alternate location or route for the
 recreational use should be identified and implemented.
- 5) As envisioned in the Master Development Plan, revegetate areas with eroded or denuded slopes for slope stability and habitat enhancement.
 - NRMP: Since the most recent fire in 2003, large vegetated areas in MTRP denuded by fire and fire breaks created to contain fire have naturally been recolonized by native and exotic species. As a result, there are few large areas in the Park where erosion poses a threat to slope stability, water quality, and/or sensitive habitats. One significant departure from this trend is continuing erosion and channel degradation in the West Sycamore area. Erosional flows emanating from a previously graded construction pad and a utility road may be impacting a population of willowy monardella (*Monardella vimnea*), an MSCP covered species. Plans to control erosion within the West Sycamore area are found in Section 4.2.4.5.
 - MPU: Habitat/Species Recommendations Conduct habitat restoration or revegetation activities within disturbed areas as needed.
- 6) Incorporate adequate setbacks into future plans to develop an equestrian center near the San Diego River in order to minimize impacts associated with brown-headed cowbird (*Molothrus ater*) parasitism. Establish a cowbird trapping program to minimize effects on the least Bell's vireo (*Vireo bellii pusillus*) and other song birds.
 - NRMP: The East Fortuna Staging Area was dedicated in 2004. A cowbird trapping program is ongoing, as detailed in Section 4.3.4.4.
 - MPU: General Habitat/Species Recommendation #15 Coordinate with regional efforts (USGS Western Ecological Research Center) to refine and develop cowbird trapping optimization studies.
 - MPU: General Habitat/Species Recommendation #16 Plan and implement a cowbird trapping program along the San Diego River as deemed necessary by City biologists.
- 7) Minimize lighting for the campground, and collect garbage frequently to reduce nuisance wildlife (raccoons, opossums, skunks, and ravens).
 - MPU: Currently, lighting is minimized at the Kumeyaay campground. No permanent artificial lighting is used at the campground except at the entry station. Phase 2 of the campground improvements has been removed from the MPU.
- 8) Establish signs to direct access and provide educational information at the periphery of sensitive resource areas and at points of access. Post signs to prohibit campfires, pets,

firearms, and camping (except where allowed). Also post road signs to identify wildlife corridors to help reduce road kills.

- NRMP: Access and exclusion signage has been proposed for new or rerouted trails adjacent to sensitive resources. For details see Sections 4.2.1, 4.2.2, 4.2.5, 4.3.1, 4.3.2, and 4.3.3.
- MPU: General Facility Recommendations #6 Maintain and repair existing signage on an as-needed basis.
- MPU: General Facility Recommendations #10 Develop and incorporate additional interpretive signage along the major trails near interpretable features, rest stops, or overlooks.
- MPU: General Facility Recommendations #13 Continue to prohibit fires in the Park to reduce fire danger, except within developed fire rings at the Kumeyaay Lake Campground, the East Fortuna Staging Area, and Lake Murray.
- MPU: General Habitat/Species Recommendations #3— Construct wildlife-compatible fencing where necessary to protect sensitive species, habitats, and cultural/historic resources.
- MPU: General Habitat/Species Recommendations #6 Close unauthorized, user-created trails where appropriate to reduce habitat fragmentation and encroachment.
- MPU: General Management Recommendation #13 Develop and implement a public information and education program focused on the requirements of the MSCP relative to the management and use of different areas of the Park.
- 9) Protect all populations of San Diego ambrosia (*Ambrosia pumila*) in the private property area immediately to the east of the Kumeyaay Lake campground. Explore methods to protect and enhance the San Diego ambrosia population, such as transplanting to more remote areas or the use of split-rail fencing.
 - NRMP: The population of San Diego ambrosia within the Park has been the subject of
 previous and ongoing research designed to answer questions that will optimize future
 management. The latest science has been used to design goals and objectives for San
 Diego ambrosia in this document. In addition, a San Diego ambrosia transplantation site
 was identified within the Park.
 - MPU: General Habitat/Species Recommendations #2— Protect populations of identified sensitive plants including: San Diego ambrosia. Reroute existing and proposed trails to avoid impacts.
 - MPU: General Habitat/Species Recommendations #7 Implement the adopted MTRP San Diego Ambrosia Management Plan.

- MPU: General Habitat/Species Recommendations #20 Construct or repair and maintain wildlife compatible exclusionary fencing and signage around populations of San Diego ambrosia as necessary.
- MPU: Park Area Specific Recommendations: Cowles Mountain CM-H3 Allow the transplantation of San Diego ambrosia from areas outside the Park to the identified restoration site. Construct and maintain wildlife compatible exclusionary fencing and signage as required.
- Mission Gorge MG-H1 Use the closed trail (MG-R11) area to expand the population of San Diego ambrosia.
- Mission Gorge-MG-R11 Close and restore the western Kwaay Paay access trail from the Old Mission Dam staging area to avoid direct conflicts with the protection of San Diego ambrosia.
- Fortuna Mountain FM-R44 Close and restore an unauthorized, user-created trail within the grasslands area that encroaches on San Diego ambrosia habitat.
- 10) (East Elliott) Implement programs to educate future adjacent landowners pursuant to the general adjacency management guidelines in Section 1.5.2.
 - East Elliott EE-P1 Allow the development of private property holdings within East Elliott consistent with the community plan, MSCP requirements, and the Mission Trails Design District Ordinance.
- 11) Preserve 90 percent of the population of San Diego ambrosia at MTRP.
 - NRMP: The population of San Diego ambrosia at the Park is conserved. Future plans which may have impacted San Diego ambrosia (Phase II of the Kumeyaay Lake Campground development) have been removed from the Plan (Section 4.2.2.3).
- 12) Monitor areas with a history of invasive species, such as artichoke thistle (*Cynara cardunculus*), tamarisk (*Tamarix* sp.), and giant reed (*Arundo donax*) for reinvasion.
 - NRMP: Giant reed and tamarisk are currently monitored within the San Diego River for reinvasion (Section 4.3.4.5). A growing population of artichoke thistle was observed within the West Sycamore area. Artichoke thistle control measures are detailed in Section 4.3.5.4.
 - MPU: General Habitat/Species Recommendations #8 Eradicate non-native invasive species from the Park whenever feasible. Control species that cannot be eradicated on a regular basis to prevent significant spreading. Restore native species and habitats, including vernal pool species, throughout the Park utilizing local seed/nursery stock when available.

- MPU: General Habitat/Species Recommendations #14— Conduct surveys for giant reed biannually (or six months after major flood events) to identify, map, and remove small infestations.
- West Sycamore Habitat/Species Recommendation WS-H1 Plan and implement a removal and control program for artichoke thistle.

Therefore, the Plans are consistent with the General Management Directives for the MHPA and the Specific Management Directives for the Park as outlined within the MSCP Subarea Plan. Impacts would be less than significant.

5.1.5 Significance of Impacts

Issue 1: Land Use Plan Conflict

As identified in the above analysis and consistency tables, implementation of the Plans would not conflict with any applicable land use plan, goal, or objective of the General Plan, Municipal Code, and the Navajo, Tierrasanta, and East Elliott Community Plans, or the Rancho Encantada Precise Plan. As City planning documents, there is an emphasis on consistency. Preparation of the NRMP for the Park was in direct response to the need for consistency with the MSCP_Subarea Plan. Therefore, technical amendments to the community plans (Tierrasanta, East Elliott, Navajo) and Rancho Encantada Precise Plan required to implement the Plans would result in impacts that would be less than significant.

Issue 2: Development Regulations Consistency

Subsequent projects implemented in accordance with the Plans would not conflict with any aspects of the LDC. None of the contemplated subsequent projects would change any land use designation or intensity, and would be allowable uses within all zoning categories of the study area. Other regulations within the LDC (ESLs, SFHA, etc.) are analyzed throughout this PEIR, as applicable. Impacts would be less than significant.

a. ESL Regulations

Policies and recommendations contained within the Plans would be supportive of the intent of ESL Regulations and would not conflict with implementation of ESL Regulations. Proposed policies within the Plans support avoidance and/or minimization of impacts to sensitive biological resources including wetlands and riparian areas (e.g., the San Diego River). Subsequent projects implemented in accordance with the MPU_Plans_and associated discretionary actions would be subject to discretionary review and further environmental review under CEQA and would be reviewed in accordance with MM-BIO-1 through MM-BIO-3 in Section 5.5, Biological Resources; and MM-HYD/WQ-1 and MM-HYD/WQ-2 in Section 5.8, Hydrology and Water Quality. Thus, implementation of the Plans and associated discretionary actions would not conflict with ESL regulations and impacts would be less than significant.

b. Historical Resources Regulations

Subsequent projects implemented in accordance with the <u>MPU-Plans</u> and associated discretionary actions would be subject to discretionary review and further environmental review under CEQA and would be reviewed in accordance with Mitigation Framework MM-HIST-1a and MM-HIST-1b in Section 5.6 Historical Resources. Implementation of the Plans and associated discretionary actions would not result in any conflicts with Historical Resource Regulations of the LDC.

Issue 3: Environmental Plan Consistency

a. MSCP Subarea Plan

Implementation of the Plans would support the goals of the MSCP Subarea Plan and support implementation of the MSCP Subarea Plan. Thus, potential impacts related to consistency with the MSCP Subarea Plan would be less than significant.

b. MHPA Consistency

Land Use Compatibility

The MSCP provides specific requirements relating to the implementation of these allowed uses within the MHPA. As the subsequent projects implemented under the Plans would either consist of public access/passive recreation projects per Section 1.4.1 of the MSCP Subarea Plan (MPU) or scientific and biological activities (NRMP), impacts would be less than significant.

Land Use Adjacency Guidelines

Management actions contemplated by the NRMP (such as weeding, revegetation, etc.) would not conflict with the MHPA Land Use Adjacency Guidelines per Section 1.4.3 of the MSCP Subarea Plan. These actions have been developed to specifically enhance sensitive habitat for sensitive plant and wildlife species. No impact would occur. However, subsequent projects implemented in accordance with the MPU Plans would introduce additional recreational uses within or adjacent to the MHPA. Impacts would be significant (Impact LU-1).

Management Directives

The Plans are consistent with the General Management Directives for the MHPA and the Specific Management Directives for the Park as outlined within the MSCP Subarea Plan (Section 1.5). Impacts would be less than significant.

5.1.6 Mitigation Framework

Implementation of the following mitigation framework would reduce **Impact LU-1** to less than significant:

MM-LU-1:

Subsequent projects implemented in accordance with the MPU-Plans which are within or adjacent to designated MHPA areas shall comply with Section 1.4 Land Use Considerations and Section 1.5 Framework Management Plan of the MSCP Subarea Plan in terms of land use, drainage, access, toxic substances in runoff, lighting, noise, invasive plant species, grading, and brush management requirements. Mitigation measures include, but are not limited to: sufficient buffers and design features, barriers (rocks, boulders, signage, fencing, and appropriate vegetation) where necessary, lighting directed away from the MHPA. The project biologist for each subsequent project would identify specific mitigation measures needed to reduce impacts to below a level of significance. Subsequent environmental review would be required to determine the significance of impacts from land use adjacency and compliance with the Land Use Adjacency Guidelines of the MSCP Subarea Plan. Prior to approval of subsequent projects in an area adjacent to a designated MHPA, the City's Environmental Designee (ED) shall identify specific conditions of approval in order to avoid or to reduce potential impacts to the MHPA.

Specific requirements shall include:

- Drainage: All new and proposed parking areas and developed areas in and adjacent to the preserve would not drain directly into the MHPA. All developed and paved areas would 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 would be maintained approximately once a year, or as often as needed, to ensure proper functioning. Maintenance would include dredging out sediments if needed, removing exotic plant materials, and adding chemical-neutralizing compounds (e.g., clay compounds) when necessary and appropriate.
- **Toxics**: Land uses, such as recreation and agriculture, that use chemicals or generate byproducts such as manure, that are potentially toxic or impactive to wildlife, sensitive species, habitat, or water quality need to incorporate measures to reduce impacts caused by the application and/or drainage of such materials into the MHPA. Such measures would include drainage/detention basins, swales, or holding areas with non-invasive grasses or wetland-type native vegetation to filter out the toxic materials. Regular maintenance would be provided. Where applicable, this requirement would be incorporated into leases on publicly owned property as leases come up for renewal.

- Lighting: Proposed lighting of all developed areas adjacent to the MHPA would be directed away from the MHPA. Where necessary, development would provide adequate shielding with non-invasive plant materials (preferably native), berming, and/or other methods to protect the MHPA and sensitive species from night lighting.
- Noise: Uses in or adjacent to the MHPA would be designed to minimize noise impacts. Berms or walls would 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. Excessively noisy uses or activities adjacent to breeding areas would incorporate noise reduction measures and be curtailed during the breeding season of sensitive species. Adequate noise reduction measures would also be incorporated for the remainder of the year.
- Barriers: New development adjacent to the MHPA may be required to provide barriers (e.g., non-invasive vegetation, rocks/boulders, fences, walls, and/or signage) along the MHPA boundaries to direct public access to appropriate locations and reduce domestic animal predation.
- **Invasives**: No invasive nonnative plant species would be introduced into areas adjacent to the MHPA.
- Brush Management: New residential development located adjacent to and topographically above the MHPA (e.g., along canyon edges) would be set back from slope edges to incorporate brush management areas on the development pad and outside of the MHPA. No residential development would occur specifically under the Plans; therefore, this would not be required.
- Grading/Land Development: Manufactured slopes associated with site development would be included within the development footprint for projects within or adjacent to the MHPA.

5.1.7 Significance after Mitigation

Although subsequent projects implemented in accordance with the MPU-Plans have the potential to conflict with the MHPA Land Use Adjacency Guidelines, future projects would be required to implement the Mitigation Framework adopted in conjunction with certification of this PEIR, including MM-LU-1 detailed above. The Mitigation Framework requires site-specific environmental review, analysis of potential impacts, and recommendations for mitigation to reduce significant impacts related to consistency with the City's MHPA to below a level of significance.

5.2 Visual Effects and Neighborhood Character

This section discusses the potential visual quality impacts that could result from implementation of the Master Plan Update (MPU) and Natural Resources Management Plan (NRMP) (collectively, the Plans for the Mission Trails Regional Park—Park and associated discretionary actions, including to views both from and of the Park. This analysis partially relies on the visual resources technical report prepared for the Project (Appendix B), the MPU, and secondary source information. This section also describes the regulatory setting applicable to subsequent projects and the existing visual landscape of the study area.

5.2.1 Regulatory Framework

The California Department of Transportation (Caltrans) manages the State Scenic Highway Program. This program was created in 1963 by the California legislature to preserve and protect scenic highway corridors from changes that would diminish the aesthetic value of lands adjacent to highways. The State Scenic Highway Program includes a list of highways that are eligible for designation, or have been designated, as scenic highways. A highway may be designated as scenic depending upon how much of the natural landscape can be seen by travelers, the scenic quality of the landscape, and the extent to which development intrudes on the traveler's enjoyment of the view (Caltrans 2014).

The City of San Diego's (City's) Land Development Code (LDC) includes lighting, glare, height, bulk, and architectural regulations. The LDC also includes the Mission Trails Design District Ordinance MTDDO and Design Manual, which implements an overall policy that new development in specified areas outside of the Park boundaries should be developed to relate to the Park and existing landscaping in the Park (City of San Diego 2013c). While the Mission Trails Design District Ordinance MTDDO and Design Manual do not apply to projects or activities set forth in the Plans applies only to areas that have development potential, and provides design guidelines, subdivision, zoning, and other land use controls to ensure development is compatible with the edge of the Park. The West Sycamore expansion area is 100 percent conserved with no development potential and as such, the MTDDO does not apply. However, privately-owned properties within the East Elliott expansion area would be subject to the supplemental regulations of the MTDDO as specified in Table 132-12A, Mission Trails Design District Applicability; they are further analyzed in Section 5.1, Land Use, of this Program Environmental Impact Report (PEIR).

5.2.2 Environmental Setting

5.2.1.1 Existing Visual Landscape

a. Landform

Study area landforms include the low-lying San Diego River that cuts through the steep slopes of Mission Gorge. The visually prominent Cowles Mountain is a regional landmark, visible from surrounding areas due to its height. The Lake Murray area is dominated by the 200-acre reservoir and associated active recreational uses. Further north is the Fortuna Mountain area that includes the prominent ridgeline of Fortuna Mountain flanked by a large valley and plateau to its west, and a complex of north-south canyons to its east. The East Elliott area is composed of canyon complexes, along with the Sycamore Landfill. The West Sycamore area is undeveloped with sloping terrain and is separated from the other areas by Marine Air Corps Station Miramar.

b. Scenic Resources and Views

For purposes of this analysis, the entire study area is considered a scenic resource, including the prominent ridgeline that connects Cowles and Fortuna Mountains and the river valleys, canyons, and natural features that comprise the Park. Public views are views from public resources such as public open space and public parks and schools, municipal buildings, and public roadways. Significant public viewing resources are located within the Park. Cowles Mountain summit is the highest point in the Park and the City of San Diego, offering a 360-degree view of San Diego County. There are numerous viewing opportunities of the Park from the surrounding communities due to the elevation differential between surrounding communities and the higher elevations of the Park.

c. Scenic Highways

One scenic highway runs through the Park. In 2016, State Route (SR) 52 was designated as a State Scenic Highway between Santo Road and Mast Boulevard. This route runs between the Fortuna Mountain and East Elliott areas. Notable scenic features of SR-52 include Mission Trails Summit, which divides the coastal plain from inland valley, and Cowles Mountain, the highest point in the City.

The next nearest designated State Scenic Highway is SR-125, just south of Interstate 8 (I-8), located approximately 2 miles east of Lake Murray. This scenic highway encompasses a 1.8-mile stretch of SR-125 from SR-94 to I-8 near La Mesa.

The State Scenic Highway Program describes this route:

The traveler on this portion of SR-125 is given a commanding view of the scenic, rolling terrain of the corridor. This is primarily the result of the freeway being somewhat above the immediately adjacent terrain with the land sloping generally upwards on both sides. The overview is pleasing, allowing the traveler to look out upon attractive residential areas. Mount Helix, with its elevation, is the dominant feature within the corridor. Beyond the corridor, distant views of Cowles Mountain to

the northwest, and to Dictionary Hill and San Miguel Mountain to the south and southeast, are particularly significant to the scenic character of the corridor.

d. Community Character

The Park is generally characterized by its open space, natural vegetation, slopes, and associated recreational uses. The south end of Mission Gorge contains the Park's Visitor and Interpretive Center that receives numerous visitors annually, hosting 85,088 visitors in 2011. Recreational uses in this area include family and group picnic areas, park concessions, a bike skills site, and an outdoor amphitheater. The Lake Murray area is characterized by active recreational uses centered around Lake Murray and Alvarado Point. The paved maintenance road along the edge of the lake is heavily used by walkers, runners, cyclists, and in-line skaters. The Cowles Mountain and Fortuna Mountain areas are characterized by their largely undeveloped state, with recreational activity focused on hiking and mountain bike trails and equestrian use at Fortuna Mountain. The East Elliott area is undeveloped and characterized by the presence of unauthorized trails and the Sycamore Canyon Landfill. The West Sycamore area contains trails and disturbance from a prior industrial use.

5.2.3 Significance Determination Thresholds

Thresholds used to evaluate potential adverse impacts to visual resources or neighborhood character are based on applicable criteria in the California Environmental Quality Act (CEQA) Guidelines Appendix G and the City of San Diego CEQA Significance Determination Thresholds (2016). Thresholds are modified from the City's CEQA Significance Determination Thresholds to reflect the programmatic analysis for the Plans and associated discretionary actions. Impacts related to visual quality would be significant if implementation of the Plans and associated discretionary actions would:

- 1. Result in a substantial change to the natural topography or other ground surface relief features;
- 2. Result in the blockage of public views from designated open space areas, roads, or to any significant visual landmark or scenic vistas;
- Adversely affect the existing visual character of the City or community plan areas, particularly with respect to views from major roadways, public viewing areas, vistas, or open spaces;
- 4. Result in incompatibility with the surrounding development in terms of bulk, scale, materials, or style; or
- 5. Result in substantial light or glare which would adversely affect daytime or nighttime views in the area.

5.2.4 Impact Analysis

Issue 1: Landform Alteration

Would implementation of the Plans and associated discretionary actions result in a substantial change to the natural topography or other ground surface relief features?

The City's 2016 Significance Determination Thresholds provide additional guidance for determining potentially significant visual quality impacts related to landform alteration. As discussed in the City's thresholds document, impacts related to landform alteration are considered significant if the implementation of the recommendations in the Plans would:

- 1. Involve grading in excess of 2,000 cubic yards per graded acre or grade or grading of a smaller volume in highly scenic or environmentally sensitive areas, and the project would meet one or more of the following conditions:
 - a. Not be in compliance with the Environmentally Sensitive Lands Regulation (LDC Chapter 14, Article 3, Division 1).
 - b. Create manufactured slopes higher than ten feet or steeper than 50 percent grade.
 - c. Result in a change in elevation of steep hillsides as defined by the Section 113.0103 of the Municipal Code from existing grade to proposed grade of more than five feet by either excavation or fill, unless the area over which excavation or fill would exceed five feet is only at isolated points on the site.
 - d. The project includes mass terracing of natural slopes with cut or fill slopes in order to construct flat-pad structures.

As discussed in Chapter 3, Project Description, the Plans do not propose specific development at this time. Rather, they provide for the management of important natural resources while also allowing for the development of trails and other recreational amenities within the Park. The NRMP would have no impact with regards to landform alteration, as the management actions contemplated therein (such as hand weeding, exclusion fencing, and erosion control) would not result in excessive grading or the alteration of hillsides. The MPU is analyzed below.

Subsequent projects contemplated by the MPU are not anticipated to exceed any of the grading quantities that would constitute a significant landform alteration; however, some may involve some degree of landform alteration within scenic and environmentally sensitive areas.

For example, recreational amenities contemplated by the MPU include shade structures, picnic facilities, signage, benches, and trash receptacles. These features would not require extensive grading, would be placed on existing grades, and thus would not substantially change the natural topography in the areas where they would be placed.

Other projects contemplated by the MPU include off-street parking located at Barker Way (Recommendation CM-F1), Golfcrest Drive off Mission Gorge Road (Recommendation CM-F2), and east of Father Junipero Serra Trail and the existing visitor center parking area (Recommendation

MG-F6). While grading would be required to create a suitable parking area surface with proper drainage, the areas are expected to generally conform to existing topography in accordance with the <u>City's Consultant's Guide to Park Design & Development</u>, and their construction would not cause a substantial change to natural topography.

Trail management recommendations—such as revegetation along trail edges, regrading, signage, and fences—would similarly not require significant landform alteration as trails would—follow the natural contours of the land. Associated signage and fencing would not require visible landform modification. New trails conceptually identified by the MPU would be narrow and would—follow contours, resulting in minimal changes to the existing topography. Overall, potential impacts due to landform alteration would be less than significant.

Issues 2 and 3: Public Views

Would implementation of the Plans and associated discretionary actions result in the blockage of public views from designated open space areas, roads, or to any significant visual landmark or scenic vistas? Would Plans adversely affect the existing visual character of the City or community plan areas, particularly with respect to views from major roadways, public viewing areas, vistas, or open spaces?

The City's 2016 Significance Determination Thresholds include guidelines for determining potentially significant visual quality impacts related to view changes. As discussed in the City's thresholds document, impacts on public views are considered significant if subsequent projects contemplated by the Plans would:

- 1. Substantially block a view through a designated public view corridor shown in the General Plan or an adopted community plan.
- 2. Cause substantial view blockage from a public viewing area of a public resource (such as mountains) that is considered significant by the applicable community.
- 3. Exceed the allowed height or bulk regulations and this excess results in a substantial view blockage from a public viewing area.

The management actions identified in the NRMP would not result in the blockage of public views, nor would they adversely affect the existing visual character of open spaces or Scenic Highway SR-52. Actions such as weed removals, exclusion fencing, and transplantations would improve the aesthetics of open space areas by protecting sensitive biological resources, while also not substantially blocking public views. The MPU is analyzed below.

Views to and from Scenic Highway SR-52 is the primary consideration of this analysis. Various MPU Recommendations would serve to improve views to and from SR-52. Trail closures and revegetation recommendations for unpaved utility roads would generally improve the overall visual quality by increasing visual continuity of the Park's natural vegetation that can be seen from SR-52. For example, Recommendation CM-H1 would reduce the width of sections of a service road within the Cowles Mountain area that have become excessively wide. Implementation of this and other related MPU recommendations would generally result in narrower trails and would generally serve to improve the visual character of the study area.

The development of recreational amenities such as shade structures, picnic facilities, signage, benches, and trash receptacles are also contemplated by the MPU. Depending on their placement, these features may be visible from SR-52, other public roads, open space areas in the Park, and neighboring residential areas; however, these amenities would be small in scale, particularly when compared to the landforms surrounding them, and would not block views to or from SR-52 and other significant visual landmarks or scenic vistas. Furthermore, these amenities would be placed in areas along trails used by Park visitors to access scenic vistas, such as the peak of Cowles Mountain.

Other subsequent projects may include new trails and trail reroutes. New trails would be visually similar to existing trails and unpaved utility roads, but generally would be narrower, thus less prominent. New trails developed in low-lying areas would not be highly visible from other areas of the Park or from surrounding neighborhoods and roadways or SR-52. On the other hand, proposed new trail segments along high-elevation hillsides would potentially be visible from many points, including open space areas within the Park, major roadways near the Park, and neighboring residential areas. As new trails would be narrow, have a low profile, and would follow contours, they would not block views to or from the park, or to and from open spaces, and would be visually compatible with the park's existing features and trails.

In addition, the City's Parks and Recreation Department maintains a Consultant's Guide to Park Design and Development that provides guidelines for the design and development of City parks (City of San Diego 2011). Appendix K of this guide provides detailed requirements and standards for trail construction such as tread width, and maximum grade and cross slope that would be used during design and implementation of the MPU recommendations for trails.

Parking areas contemplated by the MPU would not be expected to obstruct views due to their low profile. The areas would be visible from higher-elevation open space areas in the Park, but would be similar in appearance to nearby roadways. For example, the parking area near Barker Way (Recommendation CM-F1) would be near a residential neighborhood, but would be located at a slightly higher elevation than the abutting street, which would reduce its visibility from the neighboring residential area and roadways. Although some other parking areas identified by the MPU would be visible from open space areas, they would not block views to or from roads, open space areas, or any significant visual landmarks or scenic vistas due to their low profile.

The Park is visible from major roadways including SR-52, I-8, and SR-125. The higher elevations of the Park are visible from other major roadways, but at a more distant location such that implementation of future projects would be imperceptible to a motorist. SR-52 has been designated as a State Scenic Highway between Santo Road and Mast Boulevard. Future projects would be imperceptible to motorists on SR-52.

As previously discussed, subsequent projects contemplated by the MPU would generally be of such a scale and profile that they would not obstruct views of the Park from passing motorists, neighboring residents, or other potential viewers. Parking areas would not be within the viewshed of passing motorists and proposed structures would be of such a scale that they would blend in with existing park features and would be dominated by the larger scale natural topographical features. The potential viewshed impact for passing motorists is further reduced by the speed of travel and short viewing times.

The MPU contemplates several subsequent projects beyond those previously detailed, which may be visually noticeable. The visual character and viewshed impacts of these recommendations are discussed in Table 5.2-1.

Potential	Table 5.2-1 Potential Viewshed Impacts of MPU Recommendations						
Recommendation	Viewshed/Visual Character Impacts						
LM-P3 suggests an alternative use concept for the existing golf course if the City determines it is no longer viable. The alternative use would provide active and passive recreation, family and group picnicking with meandering trails, and a linear open play area connecting Lake Murray with Cowles Mountain. The City of San Diego Public Utilities Department would need to be compensated for the conversion of the property to public parkland and would retain facility easements for the various utilities within the area.	If implemented, the vegetation and physical amenities within the golf course would either remain or be replaced with visually similar facilities, and the visual effect would be minimal.						
LM-H2 suggests the removal of dead, diseased and small eucalyptus trees, and the replacement of eucalyptus trees with native trees.	The removal of existing trees would be noticeable from within existing Park areas and potentially visible from nearby residences; however, the effect would be temporary and would not substantially change the visual character of the area or significantly alter views. Native trees would have a similar visual appearance as the existing vegetation, and would similarly screen rather than block views. Native trees would likely increase the visual continuity of the area with the surrounding natural environment, and thus would be compatible in terms of bulk and scale.						
CM-P1 would provide pedestrian and bicycle facilities along the portion of Mesa Road bordering the Park, if the road is extended southward to connect to Lake Murray Boulevard.	The inclusion of bicycle and pedestrian facilities would not create a substantial change compared to the installation of a roadway without pedestrian and bicycle facilities. The recommendation also suggests native landscaping along the roadway that would reduce the visual change and increase the continuity of the roadway with the visual environment of the park.						
CM-F6 would modify the current communication facilities at the top of the mountain to have a less visible profile when funds are available, and technological advances allow for minimization of equipment.	Implementation of this recommendation would reduce the visual contrast of the existing communication facilities, which have from some angles an imposing profile. The result would be an improvement in the visual environment of the immediate area, and would reduce the noticeability of the antennae from afar.						

Table 5.2-1						
Potential	Viewshed Impacts of MPU Recommendations					
Recommendation	Viewshed/Visual Character Impacts					
MG-F8 would provide for a permanent restroom at the Old Mission Dam staging area to replace the existing portable toilets.	A new comfort station/restroom would be smaller than other nearby buildings such as the visitor center building, but would be larger than the existing portable units. The restrooms would likely be situated to make use of existing flat, graded areas, without substantially changing the existing topography, and would not block public views to or from any significant visual landmarks. It would be visible from the staging area and parking area, and a portion may be visible from Father Junipero Serra Trail.					
	The new facility would be similar in style and use of material as the visitor center and other facilities in the park, and therefore would better blend into the existing visual environment more than the portable facility, which visually contrasts with its surroundings. The comfort station would therefore not affect the visual character of the area, and would be compatible with the staging area and abutting open spaces. Any lighting associated with the permanent facility would be shielded and make use of cut-off shields to limit impacts to night sky and reduce light spilling into adjacent habitat areas. If solar panels are used, they would be integrated into the structure's roof.					
MG-R4 would provide an all-weather suspension or truss pedestrian and bicycle bridge across the San Diego River near the existing crossing trail.	The proposed bridge would likely have one middle truss in addition to the end supports, and generally would be designed to exclude motorized vehicles, though it may be wide enough for emergency access. A new bridge in this proposed location would generally be lower in elevation than the surrounding park areas, which would limit visibility of the bridge silhouette within the park. The bridge would be designed to minimize the footprint of the abutments, with minimal change to the natural topography. The bridge would not be visible from public roadways, but would be visible from open space areas, mostly from points at higher elevations which look down at the river gorge. The bridge would be a noticeable, new man-made feature in a mostly undeveloped area, but would be similar in character, design, materials,					
	scale, and bulk to developed park features that visitors see while approaching the bridge (such as the visitor center). As such, it would not be incompatible with the surrounding development, and would not significantly affect the visual character of the area or block views. Any lights installed for safety on the bridge and bridge approach would be installed per City of San Diego night sky regulations and lit areas would be minimized to the bridge walking surface. All lights would be shielded from overspill into the adjacent natural areas.					
FM-F1 would allow for construction of the last phase of the East Fortuna Staging Area.	Construct the last phase of improvements at the East Fortuna Staging Area per Site Development Permit #40-0524 which includes an administrative/maintenance building and a large covered group picnic area at the East Fortuna Staging Area. This improvement was approved under a previously certified environmental document and Site Development Permit.					

Table 5.2-1 Potential Viewshed Impacts of MPU Recommendations						
Recommendation Viewshed/Visual Character Impacts						
FM-F3 would allow for reconstruction of the Old Mission Dam overlook on the northern river bank.	Implementation of this recommendation would repair damaged existing facilities and would not create visual contrast or have a visual effect on the area.					
WS-F1 would provide a restroom, ranger office, hitching posts, shade structures, and picnic tables at the West Sycamore staging area.	The proposed building(s) and facilities would be located on a previously disturbed pad and would be similar in style and material to existing buildings and equestrian facilities in the Park. The buildings would be smaller in scale than nearby residences, and may not be visible from the residential areas and roadways due to existing topography. If the features are visible from residences, they would be small scale features within a larger view and would not block or obstruct the view. Any lighting associated with the facilities would be installed per City of San Diego codes and regulations, and would be shielded to prevent night sky impacts or spills into adjacent open space or sensitive habitat.					

Issue 4: Neighborhood Character

Would implementation of the Plans and associated discretionary actions result in incompatibility with the surrounding development in terms of bulk, scale, materials, or style?

The City's 2016 Significance Determination Thresholds include guidelines for determining potentially significant visual quality impacts related to neighborhood character and architecture. As discussed in the thresholds, impacts are considered significant if implementation of the Plans and associated discretionary actions would:

- 1. Exceed the allowable height or bulk regulations and the height and bulk regulations of the existing patterns of development in the vicinity of the project.
- 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.
- 3. Result in the physical loss, isolation, or degradation of a community identification symbol or landmark identified in the General Plan or applicable community plan.
- 4. Contrast with surrounding development or natural topography through excessive height, bulk, signage, or architectural projections.

No structures or related development would occur under the NRMP, and therefore, it would have no impact related to this issue. The MPU is analyzed below.

Several MPU Recommendations aim to ensure the Park is developed in a manner that provides a consistent design approach. These are included as Park-wide Recommendations in the MPU. For example: Park-wide Facility Recommendation 1 states: "Incorporate consistent architectural design

vocabulary on any new structure with other buildings in the park and use common rooflines, basic shapes, and structural connections as unifying elements, allowing differences in materials, textures, and colors to reflect the unique character of each use and location." As another example, Park-wide Facility Recommendation 3 states: "Install and maintain simple, consistently designed park furniture – picnic tables, benches, trash receptacles, directional signs." These MPU recommendations would generally serve to ensure that subsequent projects would be in character with existing Park amenities.

As previously detailed, subsequent projects identified as MPU recommendations include shade structures, picnic facilities, and benches. The bulk, scale, materials, and style of such amenities would be similar to existing recreational amenities in the Park and would maintain the existing character. Therefore, these Park amenities would be visually compatible with surrounding park development and would not result in significant visual quality impacts related to neighborhood character and architecture.

Subsequent projects may also include new or expanded parking areas. The visual character of these areas would be similar to adjacent and nearby roads and parking areas within the surrounding communities and/or within the Park. The proposed Barker Way parking area may improve community compatibility by providing Park users a formalized off-street parking area to access the trailhead instead of parking on the residential streets.

Overall, considering the small scale and low visibility of the various structural elements included as MPU recommendations, significant visual quality impacts related to neighborhood character and architecture are not anticipated. Adherence to other Park-wide MPU recommendations would ensure a consistent architectural and design identity is maintained throughout the study area. Therefore, visual quality impacts related to neighborhood character and architecture would be less than significant.

Issue 5: Light and Glare

Would implementation of the Plans and associated discretionary actions shed substantial light onto adjacent, light-sensitive property or land use, or would-emit a substantial amount of ambient light into the nighttime sky?

As discussed in the City's 2016 Significance Determination Thresholds, impacts related to light and glare would be significant if:

- The project would be moderate to large in scale, more than 50 percent of any single elevation of a building's exterior is built with a material with a light reflectivity greater than 30 percent (see LDC Section 142.07330(a)), and the project is adjacent to a major public roadway or public area.
- The project would shed substantial light onto adjacent, light-sensitive property or land use, or would emit a substantial amount of ambient light into the nighttime sky. Uses considered sensitive to nighttime light include, but are not limited to, residential, some commercial and industrial uses, and natural areas.

Subsequent projects contemplated by the <u>MPU_Plans_may</u> require lighting, in some instances—<u>although Although park roads and parking areas around the Park is are generally closed at night (with the exception being the Kumeyaay Lake Campground), the City does not close the Park at <u>night</u>.</u>

For example, exterior lighting may be installed for parking area safety, and to illuminate signs and kiosks. Exterior lighting would be designed to comply with applicable regulations, including the City's Outdoor Lighting Regulations (LDC, Section 142.0740). The lighting is required to have cut-off shields to direct light away from open space areas and sensitive species, and avoid impact on night sky glare. New lighting may be powered with solar panels. If an individual solar panel is installed at each light standard, it would be integrated into the pole, thus minimizing its visual appearance. Each panel is designed to absorb as much light as possible, rather than reflect it.

A balance would be achieved between lighting to provide security and the absence of lighting necessary for a functional wildlife habitat. To avoid lighting impacts on sensitive species and/or aviation uses, parking areas would be evenly under-lit rather than over-lit. Lighting adjacent or in the MHPA would meet the requirements of the MSCP Land Use Adjacency Guidelines (see analysis within Section 5.1, Land Use, of this PEIR). Therefore, compliance with existing regulations regarding exterior lighting would ensure that impacts would be less than significant.

5.2.5 Significance of Impacts

Issue 1: Landform Alteration

Subsequent projects contemplated by the MPU-Plans are not expected to result in a substantial change to the natural topography or other ground surface relief features that would create a significant visual impact as a result of landform modification. In accordance with the City's Consultant's Guide to Park Design & Development, Recommendations for recreational amenities, parking areas, and trails assume a design that would generally follow the natural contours of the land and would not require the natural topography to be significantly altered. Impacts would be less than significant.

Issue 2 and 3: Public Views

Various MPU recommendations intend to preserve and enhance the visual environment. Considering this and the relatively small scale and low profile of the recreational amenities, park furniture, and parking areas identified by the MPU, it is not anticipated that the Project would block views of public view corridors or create substantial view blockage to or from the Park overall. Potential impacts to viewsheds, view corridors, and public viewing areas would be less than significant.

Issue 4: Neighborhood Character

Subsequent projects contemplated by the <u>MPU-Plans</u> would not exceed the allowable height or bulk regulations as no large buildings or habitable structures would be implemented. Recreational

amenities such as signs and picnic areas would be required to use similar materials as existing amenities, and would also adhere to the design guidelines within the MPU. No community identification symbols or landmarks would be affected by the MPU, nor would any recommendations—starkly contrast with surrounding development or natural topography. Impacts would be less than significant.

Issue 5: Light and Glare

Exterior lighting that may be required by subsequent projects contemplated by the MPU-Plans would be designed to comply with applicable regulations, including the City's Outdoor Lighting Regulations (LDC, Section 142.0740). The lighting would be required to have cut-off shields to direct light away from open space areas and sensitive species, and avoid impact on night sky glare. Impacts would be less than significant.

5.2.6 Mitigation Framework

Impacts would be less than significant; therefore, no mitigation is required.

5.3 Air Quality

This section addresses the potential air quality impacts that would result from implementation of the Master Plan Update (MPU) and Natural Resources Management Plan (NRMP) (collectively, the Plans for the Mission Trails Regional Park Park. It also discusses the regulations applicable to subsequent projects contemplated by the Plans and the existing air quality setting within the study area.

5.3.1 Regulatory Framework

5.3.1.1 Air Quality

Poor air quality results from the emission of air pollutants from both mobile and stationary sources. Mobile sources of air pollutants include motor vehicles, construction equipment, trains, and airplanes. Motor vehicles are the San Diego region's leading source of air pollution (County of San Diego 2008). Mobile sources of air pollution are regulated by state and federal agencies, such as the California Air Resources Board (CARB) and the United States Environmental Protection Agency (U.S. EPA), through the establishment of emission standards and emissions reduction programs and regulations. 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).

The state of California is divided geographically into 15 air basins for the purpose of managing the air resources of the state on a regional basis. Areas within each air basin are considered to share the same air masses and, therefore, are expected to have similar ambient air quality. The project is located within the San Diego Air Basin (SDAB). The regulatory framework described below details the federal and state agencies that are in charge of monitoring and controlling mobile and stationary sources of air pollutants and what measures are currently being taken to achieve and maintain healthful air quality in the SDAB.

a. Federal Clean Air Act

The federal Clean Air Act (CAA) was enacted in 1970 (and amended several times since) for the purpose of protecting and enhancing the quality of the nation's air resources. In 1971, the federal EPA developed National Ambient Air Quality Standards (NAAQS) for six pollutants of concern: ozone (O_3), carbon monoxide (CO), sulfur dioxide (SO_2), nitrogen dioxide (NO_2), lead, and particulate matter less than 10 microns (PM_{10}). In 1997, the NAAQS were refined by replacing the 1-hour ozone standard with an 8-hour ozone standard and by adding a new standard for suspended particulates 2.5 microns or less in diameter ($PM_{2.5}$). The current NAAQS are presented in Table 5.3-1 and

represent the maximum levels of background pollution considered safe, with an adequate margin of safety, to protect public health and welfare considering long-term exposure of the most sensitive groups in the general population (i.e., children, senior citizens, and people with breathing difficulties).

Table 5.3-1										
Ambient Air Quality Standards										
	Averaging	California S			National Standard	ls²				
Pollutant	Time	Concentration ³	Method⁴	Primary ^{3,5}	Secondary ^{3,6}	Method ⁷				
Ozone	1 Hour	0.09 ppm (180 µg/m³)	Ultraviolet	_	Same as Primary	Ultraviolet				
	8 Hour	0.07 ppm (137 µg/m³)	Photometry	0.075 ppm (147 μg/m³)	Standard	Photometry				
Respirable	24 Hour	50 μg/m³	Gravimetric or	150 µg/m³	Same as	Inertial				
Particulate Matter (PM ₁₀) ⁸	Annual Arithmetic Mean	20 μg/m³	Beta Attenuation	-	Primary Standard	Separation and Gravimetric Analysis				
Fine Particulate	24 Hour	No Separate St		35 μg/m ³	Same as Primary Standard	Inertial Separation and				
Matter (PM _{2.5}) ⁸	Annual Arithmetic Mean	12 μg/m ³	Gravimetric or Beta Attenuation	12 μg/m ³	15 μg/m³	Gravimetric Analysis				
Carbon	1 Hour	20 ppm (23 mg/m ³)	Non-	35 ppm (40 mg/m ³)	-	- Non-dispersive				
Monoxide (CO)	8 Hour	9.0 ppm (10 mg/m ³)	dispersive Infrared	9 ppm (10 mg/m ³)	-	Infrared Photometry				
(00)	8 Hour (Lake Tahoe)	6 ppm (7 mg/m³)	Photometry	-	-	etaeta.y				
Nitrogen	1 Hour	0.18 ppm (339 μg/m³)	Gas Phase	100 ppb (188 μg/m³)	-	Gas Phase				
Dioxide (NO ₂) ⁹	Annual Arithmetic Mean	0.030 ppm (57 µg/m³)	Chemi- luminescence	0.053 ppm (100 µg/m³)	Same as Primary Standard	Chemi- luminescence				
	1 Hour	0.25 ppm (655 μg/m³)		75 ppb (196 μg/m³)	-					
Sulfur	3 Hour	_	_	_	0.5 ppm (1,300 µg/m³)	Ultraviolet Fluorescence;				
Dioxide (SO ₂) ¹⁰	24 Hour	0.04 ppm (105 μg/m³)	Ultraviolet Fluorescence	0.14 ppm (for certain areas) ¹⁰	-	Spectro photometry (Pararosaniline				
	Annual Arithmetic Mean	-		0.030 ppm (for certain areas) ¹⁰	-	Method)				
	30 Day Average	1.5 μg/m ³		-	-					
Lead ^{11,12}	Calendar Quarter	-	Atomic Absorption	1.5 µg/m³ (for certain areas) ¹²	Same as Primary	High Volume Sampler and Atomic				
	Rolling 3-Month Average	-		0.15 μg/m ³	Standard	Absorption				
Visibility Reducing Particles ¹³	8 Hour	See footnote 13	Beta Attenuation and Transmittance through Filter Tape	N. M. W 15: 1.						
Sulfates	24 Hour	25 μg/m³	Ion Chroma- tography		lo National Standa	iius				
Hydrogen Sulfide	1 Hour	0.03 ppm (42 μg/m³)	Ultraviolet Fluorescence							
Vinyl Chloride ¹¹	24 Hour	0.01 ppm (26 μg/m³)	Gas Chroma- tography							

See footnotes on next page.

Table 5.3-1 Ambient Air Quality Standards

SOURCE: State of California 2013.

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.
- 2 National 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 μg/m 3 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.
- 8 On December 14, 2012, the national annual PM_{2.5} primary standard was lowered from 15 μ g/m³ to 12.0 μ g/m³. The existing national 24-hour PM_{2.5} standards (primary and secondary) were retained at 35 μ g/m³, as was the annual secondary standards of 15 μ g/m³. The existing 24-hour PM₁₀ standards (primary and secondary) of 150 μ g/m³ also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
- ⁹To 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 standard of 100 ppb is identical to 0.100 ppm.
- 10 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 non-attainment 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.
- ¹¹The 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.
- ¹²The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 µg/m³ as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated non-attainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.
- ¹³In 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.

b. California Clean Air Act

The U.S. EPA allowed states the option to develop different (stricter) air quality standards. Through the California CAA signed into law in 1988, the CARB has generally set more stringent California Ambient Air Quality Standards (CAAQS) on the seven criteria pollutants as shown in Table 5.3-1.

The California CAA additionally requires that air quality management districts implement regulations to reduce emissions from mobile sources through the adoption and enforcement of transportation control measures and the following:

- Demonstrate the overall effectiveness of the air quality program;
- Reduce non-attainment pollutants at a rate of 5 percent per year, or include all feasible measures and expeditious adoption schedule;
- Implement public education programs;
- Reduce per-capita population exposure to severe non-attainment pollutants according to a prescribed schedule;
- Include any other feasible controls that can be implemented, or for which implementation can begin, within 10 years of adoption of the most recent air quality plan; and
- Rank control measures by cost-effectiveness and implementation priority.

c. State Implementation Plan

The State Implementation Plan (SIP) is a collection of documents that set forth the state's strategies for achieving ambient air quality standards. The SDAPCD is responsible for preparing and implementing the portion of the SIP applicable to the SDAB. The SDAPCD adopts rules, regulations, and programs to attain state and federal air quality standards, and appropriates money (including permit fees) to achieve its objectives.

d. Regional Air Quality Strategy

The SDAPCD prepared the 1991/1992 Regional Air Quality Strategy (RAQS) in response to requirements set forth in the California CAA. Attached as part of the RAQS are the Transportation Control Measures (TCMs) adopted by the San Diego Association of Governments (SANDAG). Updates of the RAQS and corresponding TCM are required every three years. The RAQS and TCM set forth the steps needed to accomplish attainment of state and federal ambient air quality standards. The most recent update of the RAQS and TCM occurred in 2009.

5.3.2 Environmental Setting

5.3.2.1 Air Basin/Geographic Setting

The project area is located within the SDAB, which encompasses the entire County of San Diego. The westerly, coastal areas of the SDAB typically experience westerly winds which direct pollutants eastward, as described below. The eastern portion of the SDAB is surrounded by mountains to the north, east, and south. These mountains tend to restrict airflow and concentrate pollutants in the valleys and low-lying areas below.

Air quality is commonly expressed as the number of days per year in which air pollution levels exceed federal standards set by the U.S. EPA or state standards set by CARB.

5.3.2.2 Climate

The project area is located approximately 10 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 65 degrees Fahrenheit (°F). The average annual precipitation is 12 inches, falling primarily from November to April. Winter low temperatures in the study area average approximately 56°F, and summer high temperatures average approximately 86°F. The average relative humidity is 69 percent and is based on the yearly average humidity at Lindbergh Field (Western Regional Climate Center 2014).

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 (AMSL). In winter, the morning inversion layer is about 800 feet AMSL. In summer, the morning inversion layer is about 1,100 feet AMSL. 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 (SCAB) 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.

5.3.2.3 Existing Air Quality

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 U.S. EPA. The SDAPCD maintains 11 air quality monitoring stations located throughout the greater San Diego metropolitan region. Air pollutant concentrations and meteorological information are continuously recorded at these stations. Measurements are then used by scientists to help forecast daily air pollution levels. Table 5.3-2 summarizes the number of days per year during which state and federal standards were exceeded in the SDAB overall during the years 2009 to 2013.

The San Diego—Kearny Villa Road monitoring station, located approximately 2 miles west of the study area, is the nearest station to the project area. The San Diego—Kearny Villa Road monitoring station began measuring ozone in 2010, and NO₂, PM₁₀, and PM_{2.5} in 2012. The El Cajon—Redwood Avenue monitoring station, located approximately 5 miles southeast of Mission Trails Regional Park, is the next closest monitoring station to the project area, and contains complete ozone, NO₂, PM₁₀, and PM_{2.5} measurement data for years 2009 through 2013. Table 5.3-3 provides a summary of measurements collected at the San Diego—Kearny Villa Road and the El Cajon—Redwood Avenue monitoring stations for the years 2009 through 2013.

						An	nbient Air		ible 5.3-2 ımmary – S	an Diego Ai	ir Basin									
	Average	California Ambient Air Quality	Attainment	National Ambient Air Quality	Attainment		Maxir	mum Conco	entration		Numbe	er of Days	Exceeding	State Sta	ndard	Number	r of Days E	xceeding N	lational Sta	andard
Pollutant	Time	Standards ^a	Status	Standards ^b	Status	2009	2010	2011	2012	2013	2009	2010	2011	2012	2013	2009	2010	2011	2012	2013
O ₃	1 hour	0.09 ppm	N	N/A	N/A	0.119	0.107	0.114	0.101	0.095	8	7	5	2	2	N/A	N/A	N/A	N/A	N/A
O ₃	8 hours	0.07ppm	N	0.075 ppm	N	0.098	0.088	0.093	0.084	0.083	47	21	33	25	28	24	14	10	10	7
CO	8 hours	9 ppm	Α	9 ppm	Α	3.24	2.46	2.44	3.61	Na	0	0	0	0	Na	0	0	0	0	Na
NO ₂	1 hour	0.18 ppm	Α	0.100 ppm	Α	0.091	0.091	0.100	0.077	0.091	0	0	0	0	0	0	0	0	0	0
NO ₂	Annual	0.030 ppm	Α	0.053 ppm	Α	0.021	0.021	0.020	0.020	0.019	NX	NX	NX	NX	NX	NX	NX	NX	NX	NX
PM ₁₀	24 hours	50 μg/m³	N	150 μg/m³	U	123.0	108.0	126.0	126.0	92.0	25/ 146.4*	22/ 136.0*	23/ 138.5*	6/ 6.1*	1/ 6.0*	0/ 0.0*	0/ 0.0*	0/ 0.0*	0/ 0.0*	0/ 0.0*
PM ₁₀	Annual	20 μg/m ³	N	N/A	N/A	53.9	47.0	46.2	24.3	25.4	EX	EX	EX	EX	EX					
PM _{2.5}	24 hours	N/A	N/A	35 μg/m³	А	78.4	52.2	72.0	82.9	68.1						4/3.4*	2/2.0*	3/3.0*	2/1.0*	3/2.0 *
PM _{2.5}	Annual	12 ug/m ³	N	15 μg/m ³	Α	12.2	10.8	15.9	14.2	10.6	EX	NX	EX	EX	NX	NX	NX	EX	NX	NX

SOURCE: State of California 2014a. California Air Quality Data Statistics. California Air Resources Board Internet Site. URL http://www.arb.ca.gov/adam/welcome.html. NOTE: Data for SO₂ and 1-hour CO were not available.

^{*}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.

^aCalifornia 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.

bNational 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.

^cA = attainment; N = non-attainment; U = Unclassifiable; N/A = not applicable; Na = data not available; NX = annual average not exceeded; EX = annual average exceeded. ppm = parts per million, μg/m³ = micrograms per cubic meter.

Table 5.3-3 Summary of Air Quality Measurements Recorded at the San Diego-Kearny Villa Road and El Cajon—Redwood Avenue Monitoring Stations								
Pollutant/Standard	2009	2010	2011	2012	2013			
SAN DIEGO—KEARNY VILLA ROAD	2007	2010	2011	2012	2013			
Ozone								
Days State 1-hour Standard Exceeded (0.09 ppm)	Na	0	0	1	0			
Days State 8-hour Standard Exceeded (0.07 ppm)	Na	0	2	3	1			
Days '08 Federal 8-hour Standard Exceeded (0.075 ppm)	Na	0	1	1	0			
Max. 1-hr (ppm)	Na	0.073	0.093	0.099	0.081			
Max 8-hr (ppm)	Na	0.061	0.084	0.077	0.071			
Nitrogen Dioxide	110	0.001	0.004	0.077	0.071			
Days State 1-hour Standard Exceeded (0.18 ppm)	Na	Na	Na	0	0			
Max 1-hr (ppm)	Na	Na	Na	0.057	0.067			
Annual Average (ppm)	Na	Na	Na	Na	0.011			
PM ₁₀ *	110	110	110	110	0.011			
Measured Days State 24-hour Standard Exceeded (50 μg/m³)	Na	Na	Na	0	0			
Calculated Days State 24-hour Standard Exceeded (50 μg/m³)	Na	Na	Na	0	0			
Measured Days Federal 24-hour Standard Exceeded (150 μg/m³)	Na	Na	Na	0	0			
Calculated Days Federal 24-hour Standard Exceeded (150 µg/m³)	Na	Na	Na	0	0			
Max. Daily (μg/m³)	Na	Na	Na	35.0	39.0			
State Annual Average (μg/m³)	Na	Na	Na	Na	20.0			
Federal Annual Average (μg/m³)	Na	Na	Na	14.7	19.9			
PM _{2.5} *	ING	ING	ING	14.7	19.9			
Measured Days '06 Federal 24-hour Standard Exceeded (35 μg/m³)	Na	Na	Na	0	0			
Calculated Days '06 Federal 24-hour Standard Exceeded (35 µg/m²)	Na	Na	Na	0	0			
Max. Daily (µg/m³)	Na	Na	Na	20.1	22.0			
State Annual Average (µg/m³)	Na	Na	Na	Na	8.3			
Federal Annual Average (μg/m³)	Na	Na	Na	Na	8.3			
EL CAJON—REDWOOD AVENUE	ING	iva	iva	iva	0.5			
Ozone								
Days State 1-hour Standard Exceeded (0.09 ppm)	2	1	1	0	0			
Days State 8-hour Standard Exceeded (0.07 ppm)	5	6	1	1	3			
Days '08 Federal 8-hour Standard Exceeded (0.07 ppm)	2	3	1	0	1			
Max. 1-hr (ppm)	0.098	0.102	0.105	0.086	0.090			
Max 8-hr (ppm)	0.038	0.102	0.103	0.074	0.078			
Nitrogen Dioxide	0.003	0.076	0.007	0.074	0.076			
Days State 1-hour Standard Exceeded (0.18 ppm)	0	0	0	0	0			
Max 1-hr (ppm)	0.054	0.058	0.049	0.059	0.051			
Annual Average (ppm)	0.014	0.038	0.012	0.012	0.012			
PM ₁₀ *	0.014	0.013	0.012	0.012	0.012			
Measured Days State 24-hour Standard Exceeded (50 μg/m³)	1	0	0	0	0			
Calculated Days State 24-hour Standard Exceeded (50 μg/m³)	6.0	0.0	0.0	0.0	0.0			
Measured Days Federal 24-hour Standard Exceeded (30 μg/m³)	0.0	0.0	0.0	0.0	0.0			
Calculated Days Federal 24-hour Standard Exceeded (150 µg/m³)	0.0	0.0	0.0	0.0	0.0			
Max. Daily (μg/m³)	57.0	42.0	41.9	47.2	41.1			
State Annual Average (µg/m³)	25.3	21.3	23.7	23.4	24.4			
State Afrida Average (μg/m ³) Federal Annual Average (μg/m ³)	25.1	21.3	19.2	23.4	24.4			
PM _{2.5} *	۷,۱	۷,۱	13.4	23.4	∠4.1			
Measured Days Federal 24-hour Standard Exceeded (35 μg/m ³)	1	0	0	1	0			
Calculated Days Federal 24-hour Standard Exceeded (35 µg/m³)	3.0	0.0	0.0	3.3	0.0			
Max. Daily (µg/m³)	56.5	27.7	29.7	37.7	23.1			
State Annual Average (µg/m³)	12.2	10.8	10.6		10.6			
Federal Annual Average (µg/m³)	12.2	10.8	10.6	Na 10.5	10.6			
reuerai Armuai Average (µg/m)	12.1	10.8	10.5	10.5	10.6			

SOURCE: State of California 2014a.

Na = Not available. Monitoring data at the San Diego—Kearny Villa Road monitoring station was not available prior to 2010.

*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.

5.3.3 Significance Determination Thresholds

Thresholds used to evaluate potential impacts to air quality are based on applicable criteria in the California Environmental Quality Act (CEQA) Guidelines Appendix G, the City of San Diego (City) CEQA Significance Determination Thresholds (2016), and applicable air district standards. Impacts related to air quality would be significant if implementation of the Plans and associated discretionary actions would:

- 1. Result in an increased number of automobile trips which would/could potentially affect San Diego's ability to meet regional, state, and federal clean air standards; or
- 2. Result in air emissions that would substantially deteriorate ambient air quality, including the exposure of sensitive receptors to substantial pollutant concentrations.

5.3.4 Impact Analysis

Issue 1: Air Quality Plans/Vehicle Trips

Would implementation of the Plans and associated discretionary actions result in an increased number of automobile trips which would/could potentially affect San Diego's ability to meet regional, state, and federal clean air standards?

As detailed in the City of San Diego's 2016 Significance Determination Thresholds, a project would result in significant impacts if it would conflict with or obstruct implementation of the applicable air quality plan; or violate any air quality standard or contribute substantially to an existing or projected air quality violation (long-term operational emissions).

The SDAPCD does not provide specific numerics for determining the significance of construction and operational source-related impacts. However, the SDAPCD does specify Air Quality Impact Analysis (AQIA) trigger levels for new or modified stationary sources (SDAPCD Rules 20.2 and 20.3). Although these trigger levels do not generally apply to construction or mobile sources, for comparative purposes these levels are used to evaluate the increased emissions that would be discharged to the SDAB if the project were approved. The AQIA screening levels are shown in Table 5.3-4.

Table 5.3-4								
Air Quality Impact Analysis Trigger Levels								
Pollutant Emission Rate (lb/day) Emission Rate (tons/yr)								
NOx	250	40						
SOx	250	40						
CO	550	100						
PM ₁₀	100	15						
Lead	3.2	0.6						
ROG ¹	250 ¹	15						
PM _{2.5} ²	100 ²	10						

SOURCE: SDAPCD, Rule 20.2 (12/17/1998).

Management actions identified in the NRMP, such as hand weeding, exclusionary fencing, and related activities, would not result in operational emissions nor would they conflict with applicable air quality plans. No impact would occur. The MPU is analyzed below.

a. Air Quality Plans

The California CAA requires areas that are designated non-attainment of state ambient air quality standards for ozone, CO, SO₂, and NO₂ to prepare and implement plans to attain the standards by the earliest practicable date. The SDAB is designated non-attainment for ozone. Accordingly, the RAQS was developed to identify feasible emission control measures and provide expeditious progress toward attaining the state ozone standards, PM₁₀, and PM_{2.5} (but as noted, the California CAA only requires, in this case, a plan for ozone). The two pollutants addressed in the RAQS are reactive organic gases (ROGs) and NOx, which are precursors to the formation of ozone. Projected increases in motor vehicle usage, population, and growth create challenges in controlling emissions to maintain and further improve air quality. The RAQS, in conjunction with the TCM, were most recently adopted in 2009 as the air quality plan for the region.

The mobile source emission projections used to develop the RAQS and the SANDAG growth projections are based on population and vehicle trends and land use plans developed in general plans. As such, projects that propose development that is consistent with the growth anticipated by SANDAG's growth projections and/or the general plan would be consistent with the RAQS. In the event that a project would propose development which is less dense than anticipated by the growth projections, the project would likewise be consistent with the RAQS. In the event a project proposes development that is greater than anticipated in the growth projections, further analysis would be warranted to determine if the proposed project would exceed the growth projections used in the RAQS for the specific subregional area.

¹The threshold for VOCs is based on the Environmental Protection Agency General Conformity Rule, which equates VOC and NOX emissions under the clean air act and applies the same limitation on VOC and NOX emissions in ozone non-attainment areas (Federal Register 2010).

²PM2.5 threshold equated to PM10 as the SDAPCD does not set a limit on PM2.5 and approximately 92 percent of PM10 exhaust is PM2.5 and 61 percent of mechanical PM10 is PM2.5 (SCAQMD 2006).

The purpose of the Plans is to provide a structure for ongoing land and resource management, maintain and improve recreational trails, and protect the Park's natural and cultural resources. Some MPU recommendations identify specific physical improvements within the Park, such as park furniture (picnic tables, benches, trash receptacles), trail creations and closures, and parking areas.

These types of subsequent projects contemplated by the MPU-Plans would not result in population growth and would not cause an increase in currently established population projections. The MPU would, therefore, be consistent with the City's General Plan and RAQS. In addition, subsequent projects contemplated by the MPU-Plans would comply with all existing and new rules and regulations as they are implemented by the SDAPCD, CARB, and/or U.S. EPA related to air quality emissions. Impacts would be less than significant.

b. Long-Term Operational Emissions

Subsequent projects contemplated by the MPUPlans, such as park furniture, trail creations and closures, and parking areas, would not result in a change in operational emissions.

The traffic analysis prepared for the Project (see Appendix H) analyzed MPU recommendations for potential traffic-related impacts. There are four recommendations that include the construction of additional visitor parking, which are conceptual in nature and would require further project-level design at the time they are proposed. These include parking areas at Barker Way (36 parking spaces), Mission Gorge Road (16 parking spaces), Mesa Road (76 parking spaces), and Father Junipero Serra Trail (80 parking spaces). Parking areas themselves would not generate additional vehicle trips in the region. Rather, parking areas would slightly redistribute a small amount of traffic. Some Park visitors would park in the newly constructed parking areas rather than existing parking areas, on the street, or within adjacent residential areas. The parking areas are intended to reduce some of the parking demand on the local residential streets and would not displace existing parking opportunities. Currently, visitors parking to hike in the Park will typically park on the surrounding residential streets, both on the west and east sides of the street adjacent to residences. Any increase in Park use would likely occur with or without these Park improvements, based on regional growth and the overall demand for parks. This increased demand for Parks increases the demand for parking. Because the provision of parking would not generate additional vehicle trips and parking areas would serve existing Park areas, the additional visitor parking would not result in an increase in operational emissions. Therefore, implementation of the MPU-Plans would not result in an air quality violation, and impacts related to long-term operational air emissions would be less than significant.

Issue 2: Ambient Air Quality/Sensitive Receptors

Would implementation of the Plans and associated discretionary actions result in air emissions that would substantially deteriorate ambient air quality, including the exposure of sensitive receptors to substantial pollutant concentrations?

As detailed in the City of San Diego's 2016 Significance Determination Thresholds, a project would result in significant impacts if it would:

- Violate any air quality standard or contribute substantially to an existing or projected air quality violation (short-term construction emissions);
- Expose sensitive receptors to substantial pollutant concentrations, including air toxics such as diesel particulates;
- Create objectionable odors affecting a substantial number of people; or
- Release substantial quantities of air contaminants beyond the boundaries of the premise upon which the stationary sources emitting the contaminants is located.

The City has also established the following analysis guidelines for sensitive receptors, including exposure to CO hotspots, TACs, and odors. These guidelines can be used as screening criterion to help evaluate potential project-level impacts.

- The project would place sensitive receptors near CO "hotspots" or create CO "hotspots" near sensitive receptors.
- The project would result in exposure to TACs resulting in a maximum incremental cancer risk greater than 1-in-1 million without application of Toxics-Best Available Control Technology, or a health hazard index greater than 1, and thus be deemed as having a potentially significant impact.
- The project would create objectionable odors affecting a substantial number of people.

Management actions identified in the NRMP, such as hand weeding, exclusionary fencing, and related activities would not require the use of heavy construction equipment and would not result in substantial ground disturbance that would create fugitive dust. No impact would occur. The MPU is analyzed below.

a. Short-term Construction Emissions

This section discusses impacts associated with short-term construction-related emissions. 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.

As previously discussed, some of the MPU recommendations identify specific physical improvements within the Park as subsequent projects, such as park furniture (picnic tables, benches, trash receptacles), trail creations and closures, and parking areas. The installation of park furniture would not require the use of heavy construction equipment and would not result in substantial ground disturbance that would create fugitive dust. However, construction of parking areas as well as activities required for trail maintenance and creation would require the use of hand tools, trail building equipment, and other construction equipment such as loaders and pavers. These activities would generate short-term emissions of criteria pollutants.

Emissions due to parking area construction and trail construction activities were calculated using California Emissions Estimator Model (CalEEMod) (California Air Pollution Control Officers Association 2013). Primary inputs are the numbers of each piece of equipment and the length of each construction stage. Specific construction phasing and equipment parameters for the project are not available at this time. For parking area construction, required equipment and phasing parameters are based on SCAQMD construction surveys, U.S. EPA AP-42 emission factors, and CARB OFFROAD2011 methodology.

For trail construction, it is likely that mostly hand tools would be used because the trails would follow existing patterns. However, in some locations, a variety of heavier trail building equipment may be required. Trail construction equipment could include bobcats, trail dozers, compact utility loaders, and compact trenchers. This equipment was modeled in CalEEMod as two skid-steer loaders, one dozer, and one trencher. The CalEEMod default horsepower levels and load factors for skid-steer loaders, dozers, and trenchers are much greater than what would actually be required for trail construction. Table 5.3-5 summarizes the construction equipment parameters.

Table 5.3-5 Construction Equipment Parameters								
	Length							
Phase	(Days)	Equipment	Horsepower	Load Factor				
Parking Areas								
		1 Grader	174	0.41				
Grubbing	2	1 Tractor/Loader/Backhoe	97	0.37				
		1 Rubber Tired Dozer	255	0.40				
	4	1 Grader	174	0.41				
Grading		1 Tractor/Loader/Backhoe	97	0.37				
		1 Rubber Tired Dozer	255	0.40				
		1 Cement and Mortar Mixer	9	0.56				
		1 Paver	125	0.42				
Paving	10	1 Roller	80	0.38				
		1 Tractor/Loader/Backhoe	97	0.37				
		1 Paving Equipment	130	0.36				
		2 Skid Steer Loaders	64	0.37				
Trails	261 ¹	1 Rubber Tired Dozer	255	0.40				
1		1 Trencher	80	0.50				

¹Amount of time required to improve trails is not known at this time. A 1-year phase length with work conducted on weekdays only was assumed in order to obtain daily and annual emissions.

The maximum emissions for each criterion pollutant are shown in Table 5.3-6.

Table 5.3-6 Construction Emissions (pounds per day)									
	Parking Area	Trail		Significance					
Pollutant	Construction	Construction	Total	Threshold					
ROG	3	2	5	250					
NO _x	27	23	50	250					
СО	17	17	34	550					
SO ₂	0	0	0	250					
PM ₁₀	7	7	14	100					
PM _{2.5}	4	4	8	100					

Note that the emissions summarized in Table 5.3-6 are the maximum emissions for each pollutant, and they are the daily amounts that may occur during different phases of construction. They assume that all construction activities would occur simultaneously, and that trail construction equipment is heavier than what would actually be required. These are therefore the estimated worst-case emissions. As shown, construction emissions would be less than the applicable thresholds for all criteria pollutants and would not result in an air quality violation. Therefore, impacts related to short-term construction air emissions associated with subsequent projects contemplated by the MPUPlans would be less than significant.

b. Sensitive Receptors

Diesel Particulate Matter

As discussed above, diesel-powered equipment would be required to complete construction activities for some types of subsequent projects envisioned by the MPUPlans. Construction activities would, therefore, result in increased exposure of receptors in the vicinity of construction projects to diesel particulate matter emissions. Cancer health risks associated with exposures to diesel exhaust are typically associated with chronic exposure, in which a 70-year exposure period often is assumed. For example, a significant cancer risk would be caused by people living for many years next to a heavily used railroad line. It is highly unlikely that off-site receptors downwind of temporary construction sites would experience any significant cancer risk directly associated with diesel emissions from a construction project (e.g., trails, parking areas, park amenities), .—Bbecause construction operations are minimal and short-term; and as such, impacts associated with exposure to diesel particulate matter would be less than significant.

CO Hotspots

Small-scale, localized concentrations of CO above the state and national standards have the potential to occur near stagnation points of heavily traveled intersections. Localized, high concentrations of CO are referred to as "CO hotspots." CO hotspots can occur when projects contribute traffic to area intersections. CO hot spots almost exclusively occur near intersections with level of service E or worse in combination with relatively high traffic volumes on all roadways (Garza et al. 1997, pages 4-7 and 4-8).

As previously detailed, the MPU conceptually identifies four proposed parking areas that could be constructed under the Plans: Barker Way (36 parking spaces), Mission Gorge Road (16 parking spaces), Mesa Road (76 parking spaces), and Father Junipero Serra Trail (80 parking spaces). These roadways occur within or adjacent to residential areas and carry relatively low traffic volumes where the level of service would not be affected. The addition of parking areas adjacent to or along these roadways would not result in the degradation of intersection or roadway segment traffic operations. Impacts associated with CO hotspots would be less than significant.

c. Odors

Construction activity could generate airborne odors from exhaust emissions. Subsequent projects implemented in accordance with the MPU-Plans would, therefore, generate minor odors through the use of diesel-powered equipment. However, odors generated from vehicles and/or equipment exhaust during construction would be temporary, localized, and occur at levels that would not affect people. Therefore, impacts from construction would be less than significant.

In general, Park trails, recreational amenities, and other facilities are not associated with odor generation. There would be no odor impact associated with long-term project operation.

d. Stationary Sources

A significant stationary source air quality impact would occur if a project would release substantial quantities of air contaminant beyond the boundaries of the premises. The project would not result in the construction of a stationary source of emissions. Additionally, as discussed previously, anticipated short-term construction-related emissions and long-term operational emissions would be less than significant. Impacts associated with stationary sources of air contaminants would be less than significant.

5.3.5 Significance of Impacts

Issue 1: Air Quality Plans/Vehicle Trips

a. Air Quality Plans

Implementation of the MPU-Plans would not result in a conflict with or obstruct implementation of the applicable air quality plan, nor would it result in population growth or cause an increase in currently established population projections. The MPU would, therefore, be consistent with the City's General Plan and RAQS. Impacts would be less than significant.

b. Long-Term Operational Emissions

The MPU Plans would not result in a change in long-term operational emissions and would not result in an air quality violation. Therefore, impacts related to long-term operational air emissions would be less than significant.

Issue 2: Ambient Air Quality/Sensitive Receptors

a. Short-Term Construction Emissions

Construction emissions would be less than the applicable thresholds for all criteria pollutants and would not result in an air quality violation. Therefore, impacts related to short-term construction air emissions associated with subsequent projects implemented in accordance with the MPU Plans would be less than significant.

b. Sensitive Receptors

Diesel Particulate Matter

It is highly unlikely that off-site receptors downwind of temporary construction sites would experience any significant cancer risk directly associated with diesel emissions from a construction project. Because construction operations are minimal and short-term, impacts associated with exposure to diesel particulate matter would be less than significant.

CO Hotspots

CO hot spots almost exclusively occur near intersections with level of service E or worse in combination with relatively high traffic volumes on all roadways. Barker Way, Mission Gorge Road, Mesa Road, and Father Junipero Serra Trail carry relatively low traffic volumes. The addition of parking to these roadways would not result in the degradation of intersection or roadway segment traffic operations. Impacts associated with CO hotspots would be less than significant.

c. Odors

Odors generated from vehicles and/or equipment exhaust during construction would be temporary, localized, and occur at levels that would not affect people. Therefore, impacts from construction would be less than significant. There would be no odor impact associated with long-term project operation.

d. Stationary Sources

None of the subsequent projects contemplated by the <u>MPU-Plans</u> would result in the construction of a stationary source of emissions. Additionally, as discussed previously, anticipated short-term construction-related emissions and long-term operational emissions would be less than significant. Impacts associated with stationary sources of air contaminants would be less than significant.

5.3.6 Mitigation Framework

Impacts would be less than significant. No mitigation is required.

5.4 Greenhouse Gas Emissions

This section addresses the potential greenhouse gas emissions impacts that would result from implementation of the Master Plan Update (MPU) and Natural Resources Management Plan (NRMP) (collectively, the Plans for the Mission Trails Regional Park Park and associated discretionary actions. It also discusses regulations applicable to subsequent projects contemplated by the Plans.

5.4.1 Regulatory Framework

Federal, state, and local regulatory plans aim to reduce greenhouse gas (GHG) emissions by primarily targeting the largest emitters of GHGs: the transportation and energy sectors. These plans' goals and regulatory standards are thus largely focused on the automobile industry and public utilities. A summary of some of the key programs and regulations concerning GHG emissions and climate change is presented below.

5.4.1.1 Federal

a. Climate Action Plan

The Executive Office has produced the President's Climate Action Plan (CAP), which includes goals of cutting carbon pollution and preparing for the impacts of climate change (Executive Office of the President 2013). Cutting carbon pollution is part of the President's goal to double renewable electricity generation by 2020, through accelerating clean energy permitting and expanding and modernizing the electric grid. The plan also states that the federal government will consume 20 percent of its electricity from renewable sources by 2020. This document was produced by the executive branch and has not passed through congressional channels.

b. CAFE Standards

The federal (Corporate Average Fuel Economy [CAFE]) standards determine the fuel efficiency of certain vehicle classes in the U.S. While the standards had not changed since 1990, as part of the Energy and Security Act of 2007, the CAFE standards were increased in 2007 for new light-duty vehicles to 35 miles per gallon (mpg) by 2020. In May 2009, further plans were announced to increase CAFE standards to require light-duty vehicles to meet an average fuel economy of 35.5 mpg by 2016. In August 2012, fuel economy standards were further increased to 54.5 mpg for cars and light-duty trucks by model year 2025. This will nearly double the fuel efficiency of those vehicles compared to vehicles currently on our roads. 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.

5.4.1.2 State

The state of California has a number of policies and regulations that are either directly or indirectly related to GHG emissions. Only those most relevant to the project are included in this discussion.

a. Executive Order S-3-05—Statewide GHG Emission Targets

This executive order (EO) of 2005 proclaims that California is vulnerable to the impacts of climate change, including increased temperatures that could reduce the Sierra Nevada's snowpack, further exacerbate California's air quality problems, and potentially cause a rise in sea levels. To combat those concerns, it established the following GHG emission reduction targets for the state of California:

- by 2010 reduce GHG emissions to 2000 levels;
- by 2020 reduce GHG emissions to 1990 levels; and
- by 2050 reduce GHG emissions to 80 percent below 1990 levels.

This EO also directed the secretary of the California EPA to oversee the efforts made to reach these targets, and to prepare biannual reports on the progress made toward meeting the targets and on the impacts to California related to global warming. The first such Climate Action Team Assessment Report was produced in March 2006 and has been updated every two years thereafter.

b. Executive Order B-30-15 - 2030 Statewide GHG Emission Goal

This EO, issued by Governor Brown on April 29, 2015, established an interim GHG emission reduction goal for the state of California: by 2030, reduce GHG emissions to 40 percent below 1990 levels. This EO also directed all state agencies with jurisdiction over GHG emitting sources to implement measures designed to achieve the new interim 2030 goal as well as the pre-existing long-term 2050 goal identified in EO S- 3-05 (see discussion above). Additionally, this EO directed the California Air Resources Board (CARB) to update its AB 32 (Nuñez) mandated Scoping Plan (see discussion above) to address the 2030 goal. Therefore, in the coming months, CARB is expected to develop statewide inventory projection data for 2030 as well as commence its efforts to identify reduction strategies capable of securing emission reductions that allow for achievement of the EO's new interim goal.

c. Assembly Bill 32—California Global Warming Solutions Act of 2006

In response to EO S-3-05, the California legislature passed Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006, and thereby enacted Sections 38500–38599 of the California Health and Safety Code. AB 32 required CARB to establish an emissions cap and adopt rules and regulations that would reduce GHG emissions to 1990 levels by 2020. The CARB is also required to publish a list of discrete GHG emission reduction measures. As required by AB 32, CARB has established a statewide GHG emissions cap for 2020, and adopted reporting rules for large industrial sources and a Climate Change Scoping Plan (Scoping Plan).

d. Climate Change Scoping Plan

As directed by AB 32, the 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. CARB will update the Scoping Plan at least once every five years to allow evaluation of progress made and to correct the Scoping Plan's course where necessary.

The 2008 Scoping Plan estimated annual BAU 2020 emissions to reach 596 million metric tons of CO₂ equivalent (MMT CO₂E). Thus, to achieve 1990 emissions levels of 427 MMT CO₂E, a 169 MMT CO₂E reduction was thus determined to be needed by 2020. The majority of reductions are 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. The CARB list of recommended GHG reduction measures is shown in Table 5.4-1 below. The Scoping Plan also lists several other recommended measures that will contribute toward achieving the 2020 statewide reduction goal, but whose reductions are not (for various reasons, including the potential for double counting) additive with the measures listed in Table 5.4-1. Approved in May 2014, the First Update to the Scoping Plan defines CARB's priorities for the next five years and sets the groundwork to reach long-term goals set forth in EO S-3-05. The First Update describes advancements in climate science such as the quantification of the impacts of temperature change, further understanding of the mechanisms of climate pollutants (black carbon, methane, and hydrofluorocarbons), and improvements to GHG monitoring. The First Update also describes progress made since the original Scoping Plan including implementation of a more comprehensive Cap-and-Trade Program, the Low Carbon Fuel Standard, a 33 percent Renewable Portfolio Standard, and an Advanced Clean Cars program that has been adopted at the federal level.

Table 5.4-1							
CARB Scoping Plan-Recommended GHG Reduction Me	asures						
Recommended Reduction Measures	Reductions Counted Towards 2020 Target In MMT CO ₂ E (% total) ¹						
ESTIMATED REDUCTIONS RESULTING FROM THE COMBINATION OF CAPPED SECTORS AND COMPLEMENTARY MEASURES	146.7						
 California Light-Duty Vehicle Greenhouse Gas Standards Implement Pavley Standards Develop LEV III light-duty vehicle standards 	31.7	(22%)					
 Energy Efficiency Building/appliance efficiency, new programs, etc. Increase Combined Heat and Power (CHP) generation by 30,000 GWh Solar Water Heating (AB 1470 goal) 	26.3	(18%)					
Renewables Portfolio Standard (RPS) (33% by 2020)	21.3	(14%)					
Low Carbon Fuel Standard	15.0	(10%)					
Regional Transportation-related GHG Targets ²	5.0	(4%)					
Vehicle Efficiency Measures	4.5	(3%)					
Goods Movement Ship Electrification at Ports Systemwide Efficiency Improvements	3.7	(3%)					
Million Solar Roofs	2.1	(2%)					
Medium/Heavy Duty Trucks • Heavy-duty Vehicle Greenhouse Gas Emissions Reduction (Aerodynamic Efficiency) • Medium- and Heavy-duty Vehicle Hybridization	1.4	(<1%)					
High Speed Rail	1.0	(<1%)					
 Industrial Measures (for sources covered under cap & trade program) Refinery Measures Energy Efficiency and Co-benefits Audits 	0.3	(<.5%)					
Additional Reductions Necessary to Achieve the Cap	34.4	(23%)					
ESTIMATED REDUCTIONS RESULTING FROM UNCAPPED SECTORS	27.3						
Industrial Measures (for sources not covered under cap & trade program) • Oil and Gas Extraction and Transmission	1.1						
High Global Warming Potential Gas Measures	20.2						
Sustainable Forests	5.0						
Recycling and Waste Reduction (landfill methane capture)	1.0						
TOTAL REDUCTIONS COUNTED TOWARDS 2020 TARGET	174.0 ³						

SOURCE: Table 2 of CARB 2008.

 $^{^{1}}$ Percentages are relative to the capped sector subtotal of 146.7 MMT CO_2E , and may not total 100 due to rounding.

²This number represents an estimate of what may be achieved from local land use changes. It is not the Senate Bill 375 regional target. CARB will establish regional targets for each Metropolitan Planning Organization following input of the Regional Targets Advisory Committee and a public stakeholders' consultation process per Senate Bill 375.

 $^{^{3}}$ The total reduction for the recommended measures slightly exceeds the 169 MMT CO $_{2}$ E of reductions estimated in the BAU 2020 Emissions Forecast. This is the net effect of adding several measures and adjusting the emissions reduction estimates for some other measures.

e. California Energy Code

The California Code of Regulations, Title 24, Part 6 is the California Energy Code (CEC). This code, originally enacted in 1978 in response to legislative mandates, establishes energy-efficiency standards for residential and non-residential buildings in order to reduce California's energy consumption. The Energy Code is updated periodically to incorporate and consider new energy-efficiency technologies and methodologies as they become available. The most recent amendments to the Energy Code, known as 20163 Title 24, or the 20163 Energy Code, became effective July 1, 20165. The 20163 Title 24 requires energy use reductions of 25 to 30 percent above the former 2008 Title 24 Energy Code. By reducing California's energy consumption, emissions of statewide GHGs may also be reduced.

New construction and major renovations must demonstrate their compliance with the current Energy Code through submission and approval of a <u>2016</u> Title 24 Compliance Report to the local building permit review authority and the CEC. The compliance reports must demonstrate a building's energy performance through use of CEC-approved energy performance software that shows iterative increases in energy efficiency given selection of various heating, ventilation, and airconditioning; sealing; glazing; insulation; and other components related to the building envelope. The <u>2016</u> Title 24 governs energy consumed by the built environment by the major building envelope systems such as space heating, space cooling, water heating, some aspects of the fixed lighting system, and ventilation. Non-building energy use, or plug-in energy use (such as appliances, equipment, electronics, plug-in lighting), are independent of building design and are not subject to Title 25.

5.4.1.3 Local

a. San Diego Association of Government's Regional Plan

The Regional Plan prepared was adopted by the San Diego Association of Governments (SANDAG) in 2015 is the long-range planning document developed to address the region's housing, economic, transportation, environmental, and overall quality-of-life needs. The Regional Plan establishes a planning framework and implementation actions that increase the region's sustainability and encourage "smart growth while preserving natural resources and limiting urban sprawl." The Regional Plan encourages the regions and the County to increase residential and employment concentrations in areas with the best existing and future transit connections, and to preserve important open spaces. The focus is on implementation of basic smart growth principles designed to strengthen the integration of land use and transportation. The Regional Plan also addresses border issues, providing an important guideline for communities that have borders with Mexico. In this case, the goal is to create a regional community where San Diego, its neighboring counties, tribal governments, and northern Baja California mutually benefit from San Diego's varied resources and international location.

b. 2008 San Diego General Plan

The City of San Diego's (City's) General Plan includes several climate change-related policies aimed at reducing GHG emissions from future development and City operations. For example, Conservation

Element policy CE-A.2 aims to "reduce the City's carbon footprint" and to "develop and adopt new or amended regulations, programs, and incentives as appropriate to implement the goals and policies set forth" related to climate change. The Land Use and Community Planning Element, the Mobility Element, the Urban Design Element, and the Public Facilities, Services, and Safety Element also 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. The overall intent of these policies is to support climate protection actions, while retaining flexibility in the design of implementation measures, which could be influenced by new scientific research, technological advances, environmental conditions, or state and federal legislation.

The General Plan is based on the City of Villages Strategy, which proposes growth to be directed into pedestrian-friendly mixed-use activity centers linked to an improved regional transit system. The City of Villages Strategy shifts the focus of land use policies to encourage infill development, which can decrease mobile emissions. Cumulative impacts of GHG emissions were qualitatively analyzed and determined to be significant and unavoidable in the Program Environmental Impact Report (PEIR) for the General Plan. A PEIR Mitigation Framework was included that indicated that "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."

c. Climate Action Plan

In December 2015, the City adopted its Climate Action Plan (CAP). The CAP identifies measures to meet GHG reduction targets for 2020 and 2035. The CAP consists of a 2010 inventory of GHG emissions, a BAU projection for emissions at 2020 and 2035, state targets, and emission reductions with implementation of the CAP. The City identifies GHG reduction strategies focusing on energy-and water-efficient buildings; clean and renewable energy; bicycling, walking, transit, and land use; zero waste; and climate resiliency. Accounting for future population and economic growth, the City projects GHG emissions will be approximately 15.9 MMT CO_2E in 2020 and 16.7 MMT CO_2E in 2035. To achieve its proportional share of the state reduction targets for 2020 (AB 32) and 2050 (EO S-3-05), the City would need to reduce emissions below the 2010 baseline by 15 percent in 2020 and 50 percent by 2035. To meet these goals, the City must implement strategies that reduce emissions to approximately 11.0 MMT CO_2E in 2020 and 6.5 MMT CO_2E in 2035. Through implementation of the CAP, the City is projected to reduce emissions even further below targets by 1.2 MMT CO_2E by 2020 and 205,462 MMT CO_2E by 2035.

Following the adoption of the CAP, the City adopted a CAP Consistency Checklist that provides a streamlined review process for the GHG emissions analysis of proposed new development projects that are subject to discretionary review and trigger environmental review pursuant to CEQA. The Checklist provides the following three step process for determining if a project would be consistent with the CAP:

Step 1 – The first step in the CAP Consistency Checklist assesses a project's consistency with the growth projections in the CAP. If a project is consistent with the existing General Plan and

Community Plan land use and zoning designations or was otherwise included in SANDAG's Series 12 growth forecasts, it can be determined to be consistent with the CAP projections and can move forward to Step 2 of the Checklist. However, not all projects that are inconsistent with existing General Plan and Community Plan land use and zoning designations would be inconsistent with the CAP's projections. For example, if a project includes a land use plan and/or zoning designation amendment that would result in an equivalent or less GHG-intensive project when compared to the existing designations, it would still be within the projections assumed in the CAP and can move forward to Step 2 of the Checklist. Estimated GHG emissions under the existing and proposed designations would need to be provided to support this conclusion. A third scenario that is examined is a project that would increase the intensity of land uses through a land use plan and/or zoning designation amendment and would potentially increase GHG emissions above and beyond the projections in the CAP.

Step 2 – The second step of the CAP consistency review is to review and evaluate a project's consistency with the applicable strategies and actions of the CAP. Step 2 provides a checklist of CAP strategies related to energy and water efficient buildings; clean and renewable energy; and bicycling, walking, transit, and land use. Step 2 only applies to development projects that involve permits that would require a certificate of occupancy from the Building Official or projects comprised of one and two family dwellings or townhouses as defined in the California Residential Code and their accessory structures. All other development projects that would not require a certificate of occupancy from the Building Official shall implement Best Management Practices for construction activities as set forth in the Greenbook (for public projects).

Step 3 – The third step of the CAP consistency review applies when a project would increase the intensity of land uses through a land use plan and/or zoning designation amendment and would potentially increase GHG emissions above and beyond the projections in the CAP, as identified in Step 1. The purpose of this step is to determine whether a project that is located in a transportation priority area but that includes a land use plan and/or zoning designation amendment that would result in an increase in GHG emissions when compared to the existing designations, is nevertheless consistent with the assumptions in the CAP because it would implement CAP Strategy 3 actions. Step 3 focuses on assessing if a project would implement the General Plan's City of Villages strategy, the General Plan's Mobility Element, pedestrian improvements, the Bicycle Master Plan, and support transit-oriented development in a transportation priority area.

5.4.2 Environmental Setting

5.4.2.1 Greenhouse Gases of Primary Concern

There are numerous GHGs, both naturally occurring and man-made. Table 5.4-2 summarizes some of the most common. Each GHG has variable atmospheric lifetime and global warming potential (GWP).

Table 5.4-2 Global Warming Potentials and Atmospheric Lifetimes			
		100-Year	
	Atmospheric Lifetime	Global Warming Potential	
Gas	(Years)	(GWP)	
Carbon Dioxide (CO ₂)	50-200	1	
Methane (CH ₄)	12±3	21	
Nitrous Oxide (N₂O)	120	310	

SOURCE: U.S. EPA 2010, Annex 6.

NOTES: The methane global warming potential (GWP) includes the direct effects and those indirect effects due to the production of tropospheric ozone and stratospheric water vapor. The indirect effect due to the production of CO₂ is not included.

The atmospheric lifetime of the GHG is the average time a molecule stays stable in the atmosphere. Most GHGs have long atmospheric lifetimes, staying in the atmosphere hundreds or thousands of years. The potential of a gas to trap heat and warm the atmosphere is measured by its GWP. Specifically, GWP is defined as (U.S. EPA 2010):

The cumulative radiative forcing—both direct and indirect effects—integrated over a period of time from the emission of a unit mass of gas relative to some reference gas.

The reference gas for establishing GWP is carbon dioxide (CO_2), which has a GWP of 1. As an example, methane (CH_4), while having a shorter atmospheric lifetime than CO_2 , has a 100-year GWP of 21, which means that it has a greater global warming effect than CO_2 on a molecule-by-molecule basis.

5.4.2.2 Statewide GHG Emissions

The CARB performs statewide GHG inventories. The inventory is divided into nine broad sectors of economic activity: agriculture, commercial, electricity generation, forestry, high GWP emitters, industrial, recycling and waste reduction, residential, and transportation. Emissions are quantified in MMT CO_2E . Table 5.4-3 shows the estimated statewide GHG emissions for the years 1990, 2008, and 2011.

Table 5.4-3				
California GHG Emissions by Sector in 1990, 2008, and 2012				
1990 ¹	2008 ³	2012		
Emissions in	Emissions in	Emissions in		
MMT CO ₂ E	MMT CO ₂ E	MMT CO ₂ E		
(% total) ²	(% total) ²	(% total) ²		
23.4 (5%)	37.99 (8%)	37.86 (8%)		
14.4 (3%)	13.37 (3%)	14.20 (3%)		
110.6 (26%)	120.15 (25%)	95.09 (21%)		
	12.87 (3%)	18.41 (4%)		
103.0 (24%)	87.54 (18%)	89.16 (19%)		
	8.09 (2%)	8.49 (2%)		
29.7 (7%)	29.07 (6%)	28.09 (6%)		
150.7 (35%)	178.02 (37%)	167.38 (36%)		
-6.69				
1.27				
426.6	447.10	458.68		
	23.4 (5%) 14.4 (3%) 110.6 (26%) 103.0 (24%) 29.7 (7%) 150.7 (35%) -6.69 1.27	cons by Sector in 1990, 2008, and 1990¹ 2008³ Emissions in MMT CO₂E (% total)² Emissions in MMT CO₂E (% total)² 23.4 (5%) 37.99 (8%) 14.4 (3%) 13.37 (3%) 110.6 (26%) 120.15 (25%) 12.87 (3%) 103.0 (24%) 87.54 (18%) 8.09 (2%) 29.7 (7%) 29.07 (6%) 150.7 (35%) 178.02 (37%) -6.69 1.27		

SOURCE: California Energy Commission 2014; CARB 2007, 2014

As shown, statewide GHG source emissions totaled 427 MMT CO_2E in 1990, 447.10 MMT CO_2E in 2008, and 458.68 MMT CO_2E in 2012. Many factors affect year-to-year changes in GHG emissions, including economic activity, demographic influences, environmental conditions such as drought, and the impact of regulatory efforts to control GHG emissions. While CARB has adopted multiple GHG emission reduction measures, the effect of those reductions will not be seen until around 2015. According to CARB, most of the reductions since 2008 have been driven by economic factors (recession), previous energy-efficiency actions, and the renewable portfolio standard (CARB 2013). Transportation-related emissions consistently contribute the most GHG emissions, followed by electricity generation and industrial emissions.

The forestry sector is unique because it not only includes emissions associated with harvest, fire, and land use conversion (sources), but also includes removals of atmospheric CO₂ (sinks) by photosynthesis, which is then bound (sequestered) in plant tissues.

5.4.3 Significance Determination Thresholds

Based on the City's 2016 Significance Determination Thresholds, impacts related to GHG emissions would be significant if implementation of the Plans and associated discretionary actions would:

1. Generate GHGs, either directly or indirectly, that may have a significant impact on the environment; or

¹1990 data was retrieved from the CARB 2007 source.

²Percentages may not total 100 due to rounding.

³2008 and 2012 data was retrieved from the CARB 2014 source.

⁴Reported emissions for key sectors. The inventory totals for 2008 and 2012 did not include Forestry or Not Specified sources.

2. Conflict with the City's Climate Action Plan or another applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs.

Section 15064.4 of the CEQA Guidelines includes the following requirements for determining the significance of impacts from GHG emissions:

- (a) The determination of the significance of greenhouse gas 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 greenhouse gas 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.

The City's CAP was adopted in December 2015, and in July 2016, the City adopted the CAP Consistency Checklist (Checklist) to provide a streamlined review process for proposed new development projects that are subject to discretionary review and trigger environmental review pursuant to CEQA. The A project may rely on the CAP if the Checklist contains measures that are required to be implemented, on a project-by-project basis to ensure that the specified emissions targets identified in the CAP are achieved. If a project is determined, through the use of the Checklist, to be in compliance with the CAP, the project may rely on the CAP for the cumulative impacts analysis of GHG emissions, and is not required to perform further analysis.

5.4.4 Impact Analysis

Issue 1: Greenhouse Gas Emissions

Would <u>implementation of</u> the Plans <u>and associated discretionary actions</u> generate GHG <u>emissions</u>, either directly or indirectly, that may have a significant impact on the environment?

Management actions identified in the NRMP, such as hand weeding, exclusionary fencing, and related activities would not require the use of heavy construction equipment or generate any significant number of vehicle trips, and would, therefore, have no associated GHG emissions. No impact would occur. The MPU is analyzed below.

Some of the MPU recommendations identify specific physical improvements within the Park, such as park furniture (picnic tables, benches, trash receptacles), trail creations and closures, and parking areas. Implementation of these recommendations would not result in a change in operational emissions because they are improvements and amenities that would serve existing operations and

park users. GHG emissions due to the project would be those associated with construction activities. To evaluate the project's GHG impacts related to construction, emissions were calculated using the California Emissions Estimator Model (CalEEMod).

GHG emissions are estimated in terms of total MTCO $_2$ E. CO $_2$ E emissions are the preferred way to assess combined GHG emissions because they give weight to the GWP of a gas. The GWP, as described above in Section 5.4.2, is the potential of a gas to warm the global climate in the same amount as an equivalent amount of emissions of CO $_2$. CO $_2$ thus has a GWP of 1, CH $_4$ has a GWP of 21, and N $_2$ O has a GWP of 310, which means CH $_4$ and N $_2$ O have a greater global warming effect than CO $_2$.

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 the commute vehicles of the construction workers. Smaller amounts of GHGs are also emitted through the energy use embodied in water use for fugitive dust control. Every phase of the construction process, including demolition, grading, paving, and building, emits GHGs in volumes proportional to the quantity and type of construction equipment used.

GHG emissions due to parking area construction and trail construction activities were calculated using CalEEMod (California Air Pollution Control Officers Association [CAPCOA] 2013). Primary inputs are the numbers of each piece of equipment and the length of each construction stage. Specific construction phasing and equipment parameters for the project are not available at this time. For parking area construction, required equipment and phasing parameters were based on South Coast Air Quality Management District construction surveys, United States Environmental Protection Agency (U.S. EPA) AP-42 emission factors, and CARB OFFROAD2011 methodology.

For trail construction, it is most likely that mostly-hand tools would be used because the trails would generally follow existing patternsalignments which topographically could preclude the use of mechanical equipment. However, in some locations, a variety of heavier trail building equipment may be required. Trail construction equipment could include bobcats, trail dozers, compact utility loaders, and compact trenchers. This equipment was modeled in CalEEMod as two skid-steer loaders, one dozer, and one trencher. The CalEEMod default horsepower levels and load factors for skid-steer loaders, dozers, and trenchers are much greater than what would actually be required for trail construction. Refer to Section 5.3, Air Quality (see Table 5.3-5) for a summary of construction equipment parameters used in the modeling. Based on these assumptions, it was calculated that parking area construction activities would result in a total of 11 MTCO₂E of GHGs.

The amount of time required to improve trails is not known at this time. A one-year phase length was assumed in order to obtain annual emissions. With this assumption, it was calculated that trail improvement construction activities would result in 216 MTCO₂E annually. As noted previously, the default horsepower levels and load factors for skid-steer loaders, dozers, and trenchers are much greater than what would actually be required for trail construction. Thus, GHG emissions would be less than what was calculated.

For these reasons, implementation of the Plans would not result in substantial adverse effects related to the generation of GHG emissions, either directly or indirectly, that may have a significant effect on the environment. Additionally, implementation of the MPU_Plans_would not result in a

change in operational GHG emissions. Thus, impacts associated with GHG emissions would be less than significant.

Issue 2: Conflicts with Plans or Policies

Would implementation of the Plans and associated discretionary actions conflict with an applicable plan, policy or regulation adopted for the purpose of reducing emissions of GHGs?

a. Consistency with State Plans

Executive Order S-3-05 establishes GHG emission reduction targets for the state, and Assembly Bill 32 launched the Climate Change Scoping Plan that outlines the reduction measures needed to reach these targets. Implementation of the Plans and associated discretionary actions would not conflict with any of the Recommended Actions contained in CARB's Scoping Plan, since the Plans would not allow significant new sources of GHG emissions.

b. Consistency with Regional Plans

SANDAG's San Diego Forward: The Regional Plan

Implementation of the Plans and associated discretionary actions would not conflict with the goals of the Regional Plan to develop compact, walkable communities close to transit connections and consistent with smart growth principles because the Plans do not propose any commercial or residential development and would provide conservation of biological resources, enhanced recreational opportunities and trail connections. These actions would be consistent with the Regional Plan's Sustainable Communities Strategy. Thus, no significant adverse environmental effects would result from implementation of the Plans and associated discretionary actions in terms of consistency or conflicts with the Regional Plan.

c. Consistency with Local Plans

City of San Diego General Plan

No conflicts with the General Plan have been identified in association with implementation of the Plans and associated discretionary actions. The City's General Plan Conservation Element contains policies for sustainable development, preservation of open space and wildlife, management of resources, and other initiatives to protect public health, safety, and welfare. Implementation of the Plans would support resource conservation and recreational opportunities consistent with City General Plan policies.

City of San Diego Climate Action Plan

As discussed in Section 5.4.1.3(c), the City adopted a CAP Consistency Checklist that provides a streamlined review process for the analysis of GHG emissions. The MPU was Plans were evaluated against the three-step process provided in the Checklist. None of the contemplated subsequent projects would change any land use designation or intensity, and would be allowable uses within all

zoning categories of the Plan area. Therefore, as identified in Step 1 of the Checklist, the MPU-Plans would be consistent with the CAP projections. Step 2 of the Checklist states that "development projects that would not require a certificate of occupancy from the Building Official shall implement best management practices [BMPs] for construction activities." As BMPs would be implemented for all subsequent projects under the MPU-Plans, the measures identified in Step 2 do not apply to the MPU-Plans. Lastly, because the MPU-Plans would be consistent with land use and zoning designations, Step 3 of the Checklist does not apply.

Further, management actions identified in the NRMP would serve to enhance biological resources within the Park and would not be associated with GHG emissions. Thus, implementation of the NRMP would not conflict with implementation of the City's CAP.

As discussed in under Issue 1 above, implementation of the recommendations of the MPU would involve physical improvements including trail and parking area construction that would generate less than $900 \, \text{MTCO}_2\text{E}$ annually. These activities and associated emissions would not have the potential to conflict with any of the CAPs five primary strategies for achieving the goals of the plan. CAP Strategies include:

- Strategy 1 (Energy & Water Efficient Buildings) includes goals, actions, and targets with the aim of reducing building energy and water consumption.
- Strategy 2 (Clean & Renewable Energy) includes goals for providing clean and renewable energy within the City.
- Strategy 3 (Bicycling, Walking, Transit & Land Use) includes goals that relate to land use and planning.
- Strategy 4 (Zero Waste Gas & Waste Management) includes goals to divert solid waste and capture landfill methane gas emissions.
- Strategy 5 (Climate Resiliency) calls for further analysis of the resiliency issues that face the various areas of the City.

The purpose of the MPU is to provide a structure for ongoing land and resource management, maintain and improve recreational trails, and provide additional recreational amenities. The MPU would be consistent with the goals of CAP and other applicable plans, policies, and regulations pertaining to the reduction of GHGs. Additionally, subsequent projects contemplated by the MPU Plans would not result in a change in operational GHG emissions and construction emissions would not result in a substantial adverse effect related to GHG emissions. Impacts would be less than significant.

5.4.5 Significance of Impacts

Issue 1: Greenhouse Gas Emissions

GHG emissions due to construction activities and operation associated with the MPU Plans would not result in a substantial adverse effect related to the generation of GHG emissions, either directly or indirectly, that may have a substantial effect on the environment. Thus, impacts associated with GHG emissions would be less than significant.

Issue 2: Conflicts with Plans or Policies

Implementation of the Plans and associated discretionary actions would not result in an increase in long-term GHG emissions or conflict with applicable plans, policies, and regulations pertaining to the reduction of GHGs. Thus, impacts associated with GHG emissions would be less than significant.

5.4.6 Mitigation Framework

Impacts would be less than significant. No mitigation is required.

5.5 Biological Resources

This section addresses potential impacts to biological resources due to implementation of the Master Plan Update (MPU) and Natural Resources Management Plan (NRMP) (collectively, the Plans) for the Mission Trails Regional Park (Park). The existing biological resources within the study area used for this analysis are based on the NRMP prepared as part of the MPU. The NRMP was prepared in order to fulfill the City of San Diego's (City's) Multiple Species Conservation Program (MSCP) requirement to develop area-specific management directives (ASMDs) for the protection of natural resources at the Park, which is a core biological resource area and regional wildlife corridor. It should be noted that the NRMP would be implemented in addition to all other City regulations regarding the protection of biological resources, discussed in detail throughout this section.

5.5.1 Regulatory Framework

5.5.1.1 Multiple Species Conservation Program

The MSCP is a comprehensive habitat conservation planning program for San Diego County. A goal of the MSCP is to preserve a network of habitat and open space, thereby protecting biodiversity. Local jurisdictions, including the City of San Diego, implement their portions of the MSCP through subarea plans, which describe specific implementing mechanisms.

The City of San Diego's MSCP Subarea Plan was approved in March 1997. The MSCP Subarea Plan is a plan and process for the issuance of permits under the federal and state Endangered Species Act (ESA) and the California Natural Communities Conservation Planning Act (CNCCPA) of 1991. The primary goal of the Subarea Plan is to conserve viable populations of sensitive species and to conserve regional biodiversity while allowing for reasonable economic growth.

In July 1997, the City signed an IA with the U.S. Fish and Wildlife Service (USFWS) and California Department of Fish and Wildlife (CDFW). This serves as a binding contract between the City, USFWS, and CDFW that identifies the roles and responsibilities of the parties to implement the MSCP and Subarea Plan. The IA became effective on July 17, 1997, and allows the City to issue Incidental Take Authorizations for impacts to listed endangered or threatened species under the provisions of the MSCP. Applicable state and federal permits are still required for wetlands and listed species that are not covered by the MSCP.

a. Vernal Pool Habitat Conservation Plan

The City's <u>Draft</u>—<u>Final</u> Vernal Pool Habitat Conservation Plan (VPHCP) is envisioned as a comprehensive planning approach to preserve vernal pool species and their habitat within the City's jurisdiction.

The Draft_VPHCP is intended to provide an effective framework to protect, enhance, and restore vernal pool resources within the City of San Diego, while improving and streamlining the environmental permitting process for impacts to threatened and endangered species associated with vernal pools. The Draft VPHCP covers vernal pools and includes seven threatened and endangered covered species that do not currently have federal coverage under the City's MSCP Subarea Plan. Part of the VPHCP conservation strategy is to expand the City's existing Multi-Habitat Planning Area (MHPA) to conserve targeted vernal pool complexes in a configuration that maintains habitat function and viability of the following seven vernal pool species including two crustacean species: Diego fairy shrimp (*Branchinecta sandiegonensis*) and Riverside shrimp (Streptocephalus wootoni), and five plant species: Otay mesa mint (Pogogyne nuduliscula), California Orcutt grass (Orcuttii californica), San Diego button celery (Eryngium aristulatum), San Diego mesa mint (Pogogyne abramsii), and spreading navarretia (Navarretia fossalis), consistent with the Vernal Pool Recovery Plan (USFWS 1998); and to implement avoidance and minimization of impacts to vernal pools consistent with the Draft VPHCP and the City's Environmentally Sensitive Lands (ESL) Regulations. The Final Draft VPHCP, VPMMP, and associated environmental document (Draft-Final Environmental Impact Report/Environmental Impact Statement) have been released for public review with adoption anticipated in mid-2017was adopted by the San Diego City Council on January 22, 2018. In June 2018, the USFWS issued a Biological Opinion in accordance with Section 7 of the FESA regarding issuance of an ITP for implementation of the City's VPHCP pursuant to Section 10(a)(1)(B) of the act. Subsequently on August 3, 2018, the USFWS made findings and recommendations for issuance of Section 10(a)(1)(B) Permit Number TE-97791C to the City in accordance with the VPHCP which will cover incidental take for two federally endangered animal species (San Diego fairy shrimp and Riverside fairy shrimp) along with five listed plant species.

High-quality pools occur in two locations within the Park. Activities that may impact vernal pools would be limited to those identified in the Draft-VPHCP as covered activities that cause temporary habitat disruption but do not permanently alter landforms, and do not result in permanent habitat loss or negative impacts to vernal pool watersheds (e.g., recontoured vernal pool basins that will be restored). These activities include maintenance and use of existing trails, development of new trails, and brush management and weed abatement. The MPU incorporates the goals and objectives of the Draft-Final adopted VPHCP, and would be consistent with the requirement of the Draft-Vernal Pool Management and Monitoring Plan (adopted VPMMP). The Draft-NRMP includes specific directives regarding vernal pools consistent with the Draft-VPHCP and VPMMP. While no impacts to vernal pools are expected to occur within the Park, restoration efforts could result in impacts to vernal pool species included as a covered activity per in the Draft-VPHCP. Mitigation in accordance with the Draft-VPHCP, ESL Regulations, and the City's Land Development Manual Biology Guidelines would be required.

b. Multi-Habitat Planning Area

The MHPA is the area within which the permanent MSCP preserve is assembled and managed for its biological resources. Input from responsible agencies and other interested participants resulted in adoption of the City's MHPA in 1997. The City's MHPA areas are defined by "hardline" limits, "with limited development permitted based on the development area allowance of the OR-1-2 zone [open space residential zone]" (City of San Diego 1997).

The MHPA consists of public and private lands, much of which has been conserved. Conserved lands have been set aside for mitigation or purchased for conservation. These lands may be owned by the City or other agencies, may have easements, may be dedicated, or may have some restrictions placed upon the property through the City's processes that protects the overall quality of the resources and prohibits development.

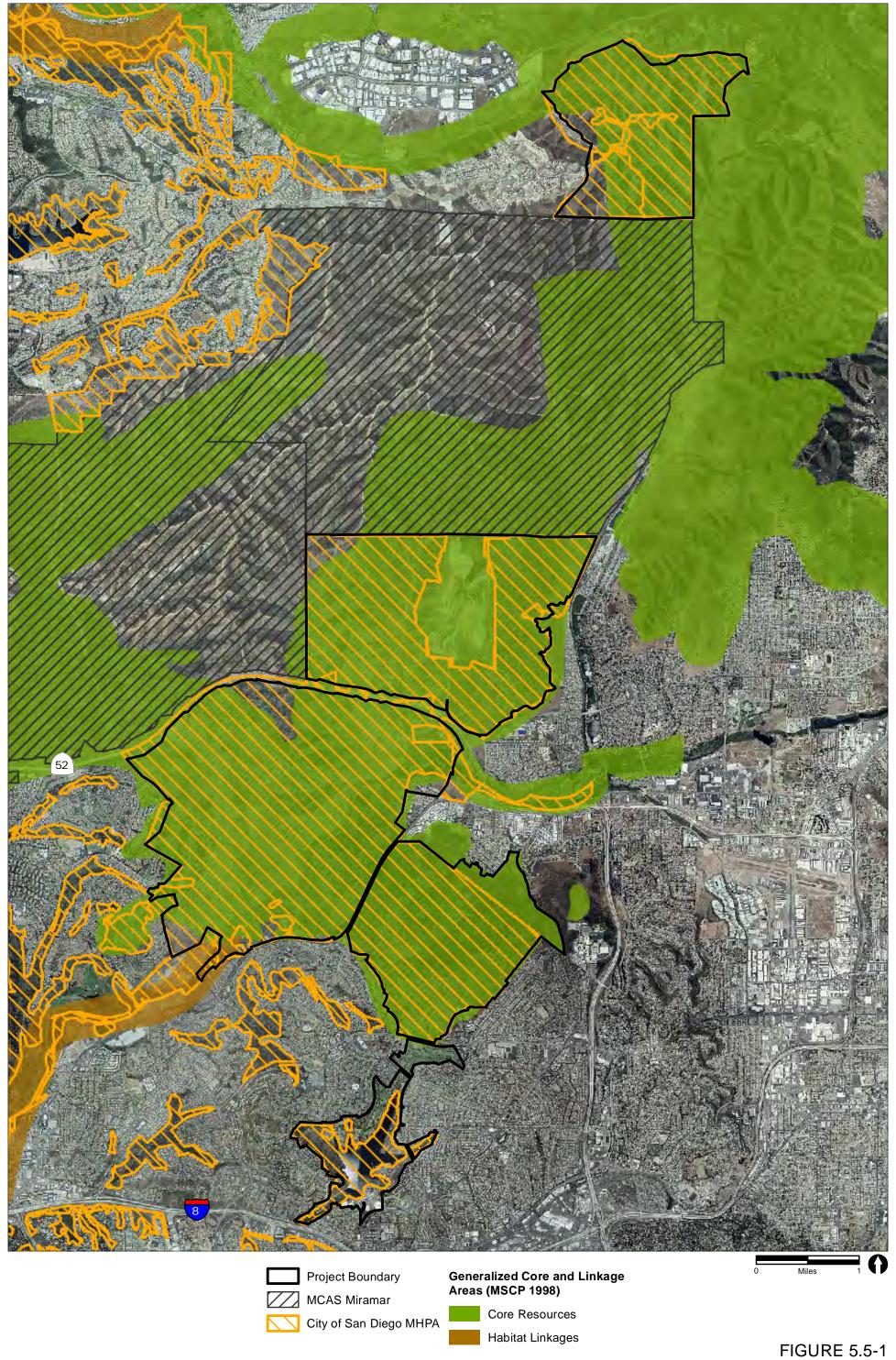
Private land wholly within the MHPA is allowed only up to 25 percent development in the least sensitive area per the City's MSCP Subarea Plan. Should more than 25 percent development be desired, an MHPA boundary line adjustment may be proposed. The City's MSCP Subarea Plan states that adjustments to the MHPA boundary line are permitted without the need to amend the City's Subarea Plan, provided the boundary adjustment results in an area of equivalent or higher biological value. To meet this standard, the area proposed for addition to the MHPA must meet the six functional equivalency criteria set forth in Section 5.4.2 of the Final MSCP Subarea Plan (City of San Diego 1997). All MHPA boundary line adjustments require approval by the Wildlife Agencies and approval from a City discretionary hearing body.

The majority of lands (87 percent) within the study area are located within the MHPA (Figure 5.5-1). The MHPA also includes regional wildlife corridors and core biological areas that are targeted for conservation. These lands have been determined to provide the necessary habitat quality, quantity, and connectivity to sustain the unique biodiversity of the San Diego region, and sensitive biological resources under the City's ESL Regulations. Conditionally compatible uses within the MHPA include passive recreation, utility lines and roads, limited water facilities and essential public facilities, limited low-density residential use, brush management zone 2, and limited agriculture (MSCP Subarea Plan Section 1.4.1).

For parcels located outside the MHPA, "there is no limit on the encroachment into sensitive biological resources, with the exception of wetlands, and listed non-covered species' habitat (which are regulated by state and federal agencies) and narrow endemic species." However, "impacts to sensitive biological resources must be assessed and mitigation, where necessary, must be provided in conformance" with the City's Biology Guidelines.

c. MSCP Management Policies and Directives

The MSCP includes management priorities to be undertaken by the City as part of its MSCP implementation requirements. Those actions identified as Priority 1 are required to be implemented by the City as a condition of the MSCP Take Authorization to ensure that covered species are adequately protected. The actions identified as Priority 2 may be undertaken by the City as resources permit.



Section 1.5.2 of the City's Subarea Plan provides general management directives which apply to all areas within the MHPA. These general directives provide guidance on access and recreation within open space areas, including the Park. PriorityGeneral management directives include:

- Install sufficient signage and barriers identifying access to the MHPA;
- Locate trails, overlooks, and staging areas in least-sensitive areas in MHPA;
- Avoid paving trails;
- Minimize recreational trail widths;
- Limit equestrian trails near sensitive resources;
- Prohibit recreational off-road and cross county access to MHPA;
- Remove homeless camps from habitat areas; and
- Regularly maintain equestrian trails to remove manure.

The City's Subarea Plan provides guidelines for MHPA compliance and specific management recommendations within the existing Park, as well as the East Elliott area, referred to in Section 1.5.6 of the City's Subarea Plan as the "Eastern Area."

The goals and objectives for this area are described as follows (City of San Diego 1997):

The optimum condition for East Elliott and Mission Trails Regional Park would be a mosaic of native habitats and compatible recreational activities, with restoration and transplantation of existing populations of endangered, threatened, and/or sensitive species where necessary.

The major issues identified in Section 1.5.6 of the City's Subarea Plan that required consideration for management in the Mission Trails/East Elliott area were identified as:

- 1. Intense land uses and activities adjacent to and in covered species habitat and linkages.
- 2. Potential associated impacts related to siting a future landfill in East Elliott.
- 3. Erosion, urban runoff, and overuse of recreational areas adjacent to sensitive drainage areas.
- 4. Off-road vehicle activity.
- 5. Exotic (non-native), invasive plants and animals.
- 6. Encroachment from existing development.
- 7. Utility, facility and road repair, construction, and maintenance activities.

The following Priority 1 guidelines are relevant to park management within the lifespan of the NRMP.

Priority 1 (MSCP required directives):

1. Prepare an NRMP for the Park to preserve and protect natural resources while encouraging public use and implementation of the Master Development Plan.

- 2. Maintain and clearly demarcate trails around the visitor center and other areas of high public use to minimize habitat destruction.
- 3. Limit future equestrian trails to specified trails which minimize trail edge disturbances and are no greater than 25 percent gradient.
- 4. Seasonally restrict, if necessary, areas along the San Diego River, including riparian restoration areas (except along established trails), to prevent disturbance of breeding areas.
- 5. As envisioned in the Master Development Plan, revegetate areas with eroded or denuded slopes for slope stability and habitat enhancement.
- 6. Incorporate adequate setbacks into future plans to develop an equestrian center near the San Diego River in order to minimize impacts associated with brown-headed cowbird (*Molothrus ater*) parasitism. Establish a cowbird trapping program to minimize effects on the least Bell's vireo (*Vireo bellii pusillus*) and other song birds.
- 7. Minimize lighting for the campground, and collect garbage frequently to reduce nuisance wildlife (raccoons, opossums, skunks, and ravens).
- 8. Establish signs to direct access and provide educational information at the periphery of sensitive resource areas and at points of access. Post signs to prohibit campfires, pets, firearms, and camping (except where allowed). Also post road signs to identify wildlife corridors to help reduce road kills.
- 9. Protect the remaining populations of San Diego ambrosia (*Ambrosia pumila*) in the private property area immediately to the east of the Kumeyaay Lake campground. Explore methods to protect and enhance the San Diego ambrosia population, such as transplanting to more remote areas or the use of split-rail fencing.
- 10. In East Elliott, implement programs to educate future adjacent landowners pursuant to the general adjacency management guidelines in Section 1.5.2.
- 11. Preserve 90 percent of the population of San Diego ambrosia at the Park.
- 12. Monitor areas with a history of invasive species, such as artichoke thistle (*Cynara cardunculus*), tamarisk (*Tamarix* sp.), and giant reed (*Arundo donax*) for reinvasion.

5.5.1.2 City of San Diego Environmentally Sensitive Lands Regulations

The purpose of the ESL Regulations (Land Development Code [LDC] Sections 143.0101 – 143.0160) is to protect, preserve and, where damaged, restore environmentally sensitive lands and the viability of the species supported by those lands. The ESL Regulations apply to all proposed development when environmentally sensitive lands, including sensitive biological resources, steep hillsides, floodplains, or coastal bluffs, are present. The regulations are designed to ensure that development occurs in a manner that protects natural resources and the natural and topographic character of the area, and retains biodiversity and interconnected habitats.

Within the study area, ESL resources include sensitive species and habitats, vernal pools and other wetlands, floodplains or areas of flooding, and steep hillsides. Many of the ESL resources are within

the existing designated MHPA where development encroachment is restricted to 25 percent in the least sensitive portion of the site. Future development implemented in accordance with the Project will be required to comply with the applicable sections of the ESL Regulations related to biological resources, wetlands, and the MSCP/MHPA.

5.5.2 Environmental Setting

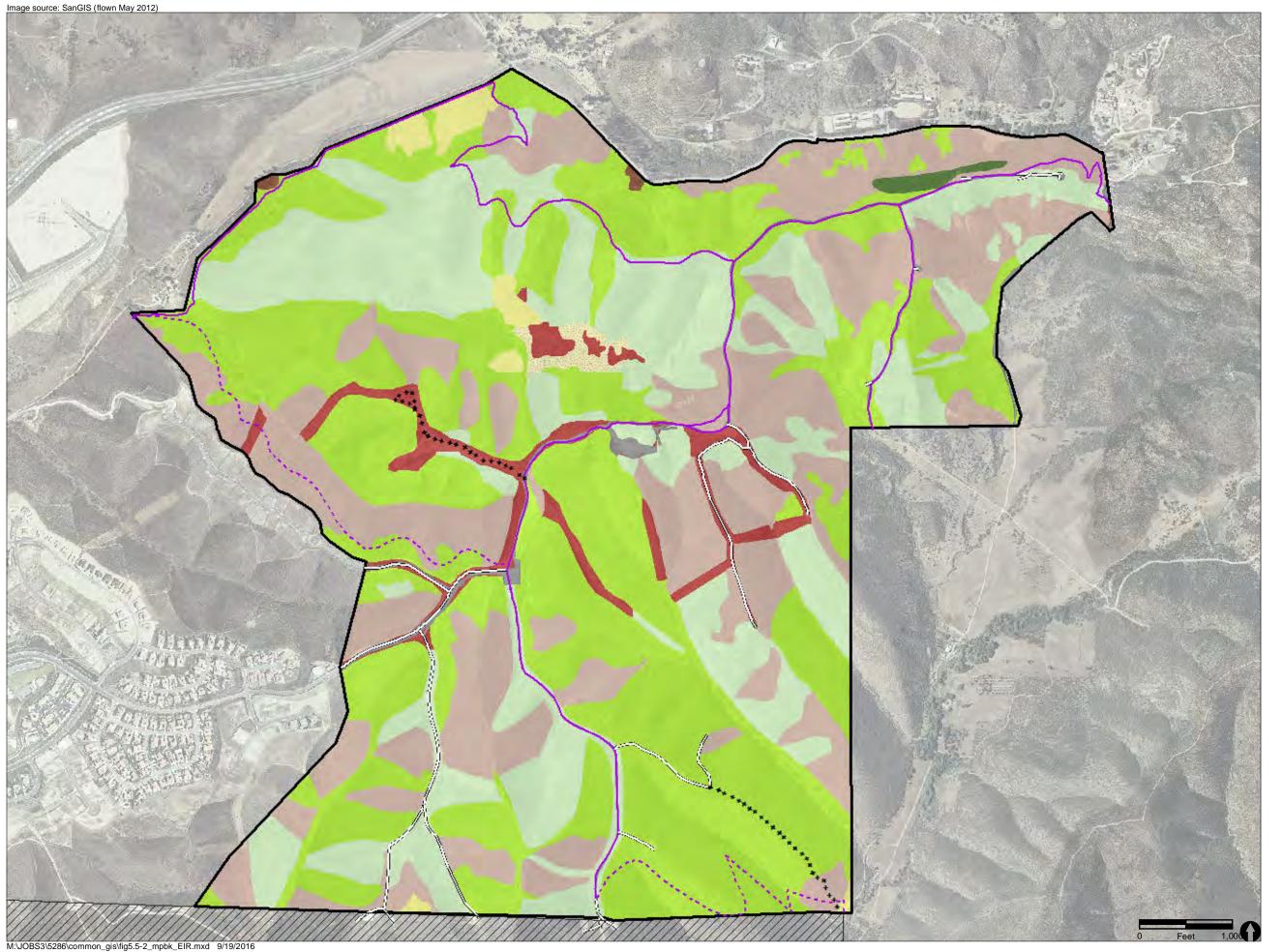
The biological resources in the study area have been researched through biological inventories, vegetation mapping, MSCP monitoring, archive research, and general scientific research, as further detailed in the NRMP.

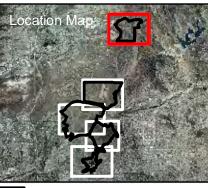
5.5.2.1 Vegetation Communities

a. Holland Vegetation Communities

Holland vegetation descriptions are designed to be a "coarse filter" dividing the landscape into manageable vegetation units (Holland 1986). Under the Holland system, the study area contains a total of 18 vegetation communities/land cover types (Table 5.5-1; Figures 5.5-2a through 5.5-2e).

Table 5.5-1 Holland Vegetation Communities and Land Cover Types			
Vegetation Community	Holland Code	Acres	
Eucalyptus Woodland	11100	20.3	
Disturbed Habitat	11300	127.3	
Urban/Developed	12000	696	
Open Water	13100	149.3	
Diegan Coastal Sage Scrub	32500	3,545.10	
Southern Mixed Chaparral	37120	1,280.50	
Chamise Chaparral	37200	2,140.00	
Scrub Oak Chaparral	37900	69.7	
Native Grassland	42100	1.5	
Valley Needlegrass Grassland	42110	17.2	
Non-native Grassland	42200	1,161.00	
Wildflower Field	42300	1.2	
San Diego Mesa Vernal Pool	44320	0.8	
Coastal and Freshwater Marsh	52410	4.3	
Southern Riparian Scrub	63300	176.4	
Mule Fat Scrub	63310	1.4	
Southern Willow Scrub	63320	236.2	
Coast Live Oak Woodland	71160	58.7	





Project Boundary

MCAS Miramar

Vegetation Communities

Chamise Chaparral

Coast Live Oak Woodland

Diegan Coastal Sage Scrub

Disturbed Habitat

Eucalyptus Woodland

Non-native Grassland

Southern Mixed Chaparral

Urban/Developed

Valley Needlegrass Grassland

Trail Closures

++++ Planned Trail Closures

Existing Trails-Proposed Use

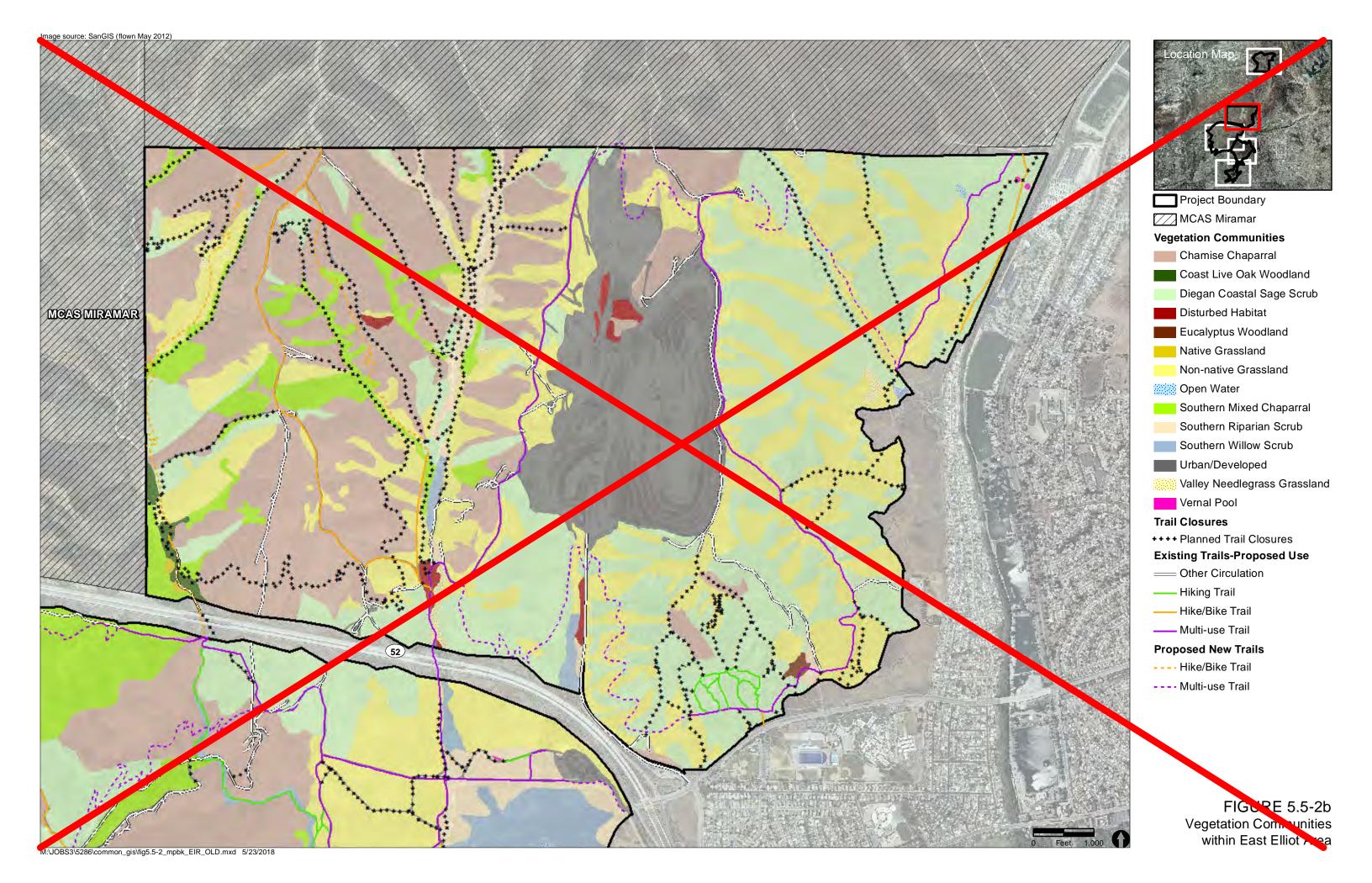
— Other Circulation

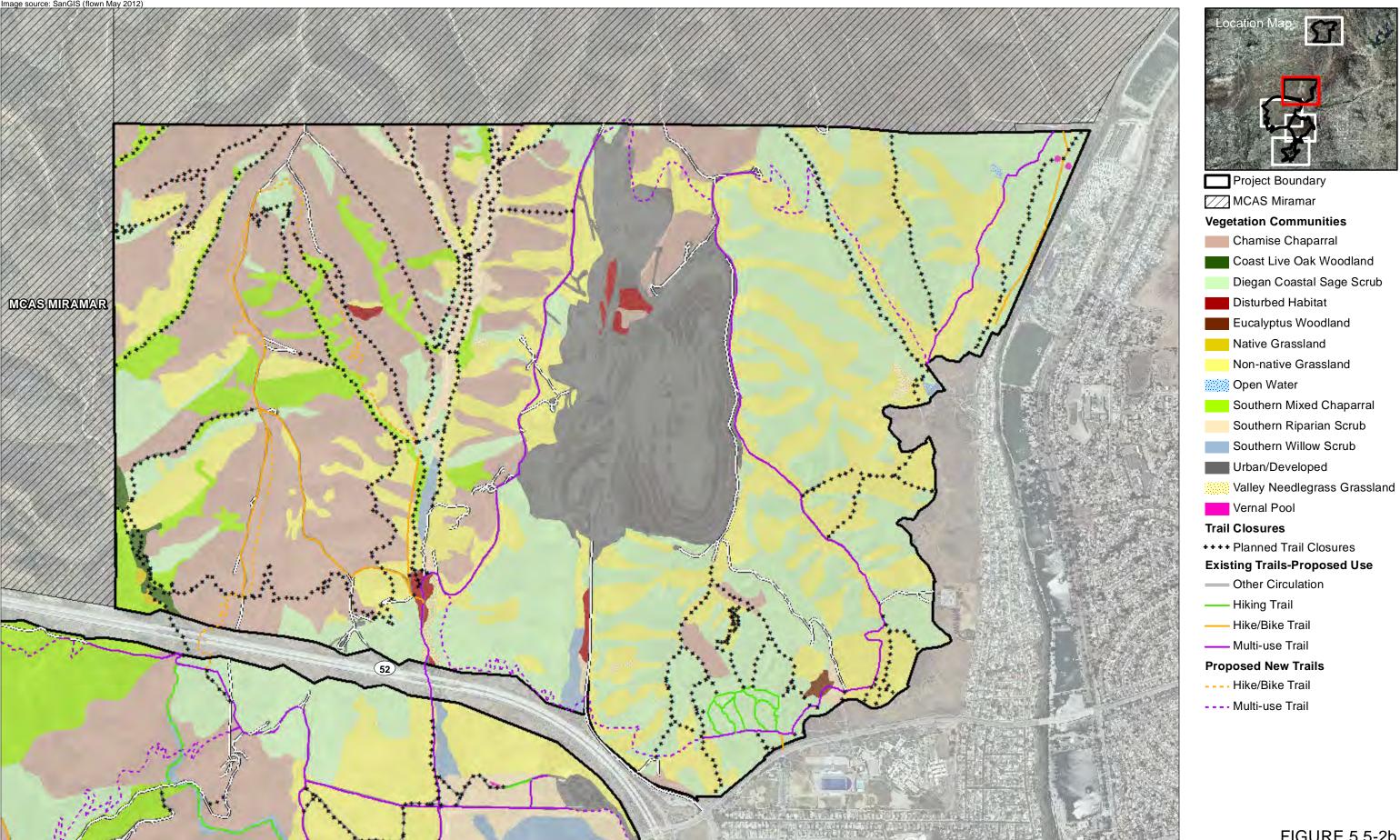
— Multi-use Trail

Proposed New Trails

--- Multi-use Trail

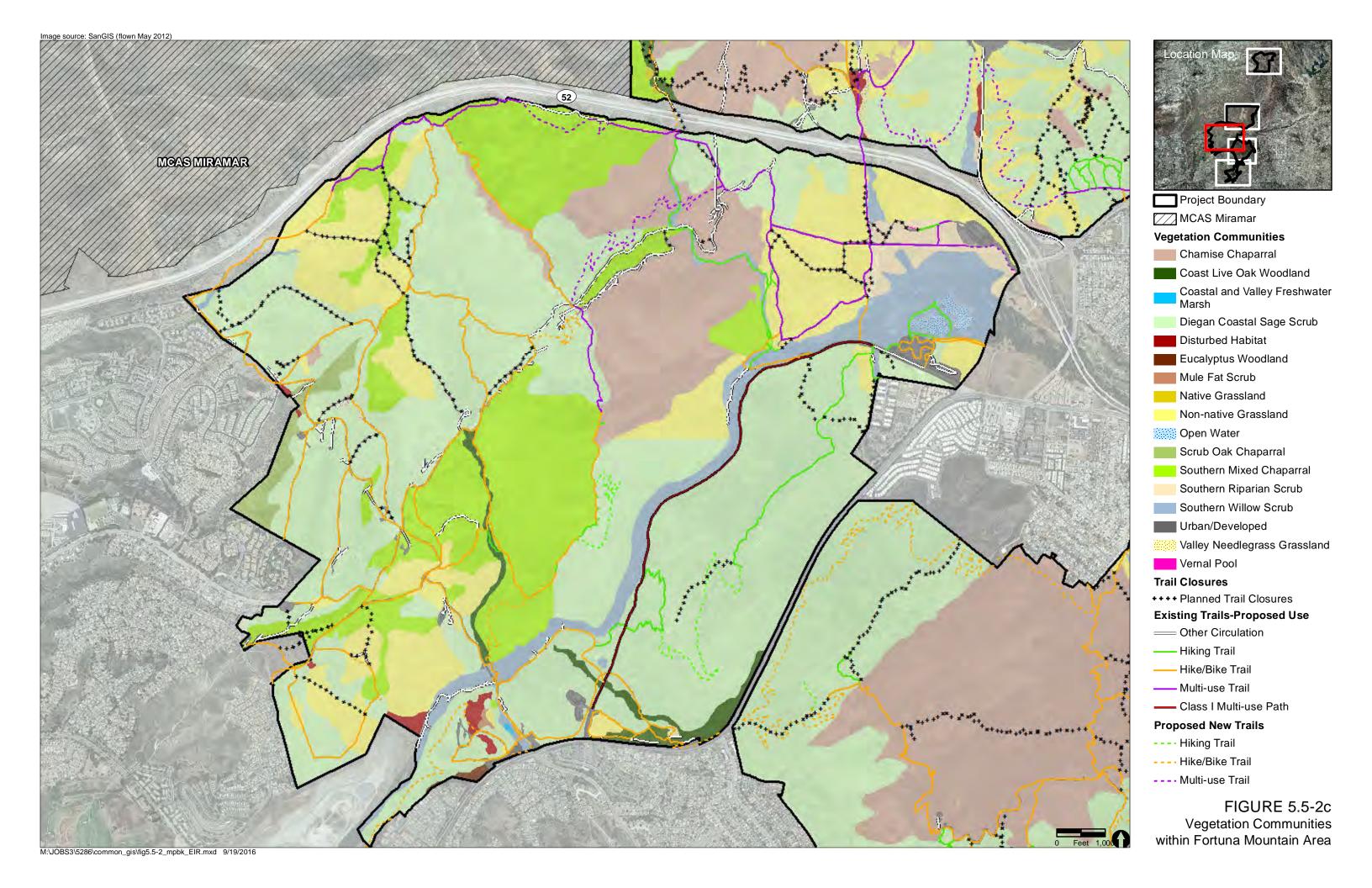
FIGURE 5.5-2a Vegetation Communities within West Sycamore Area

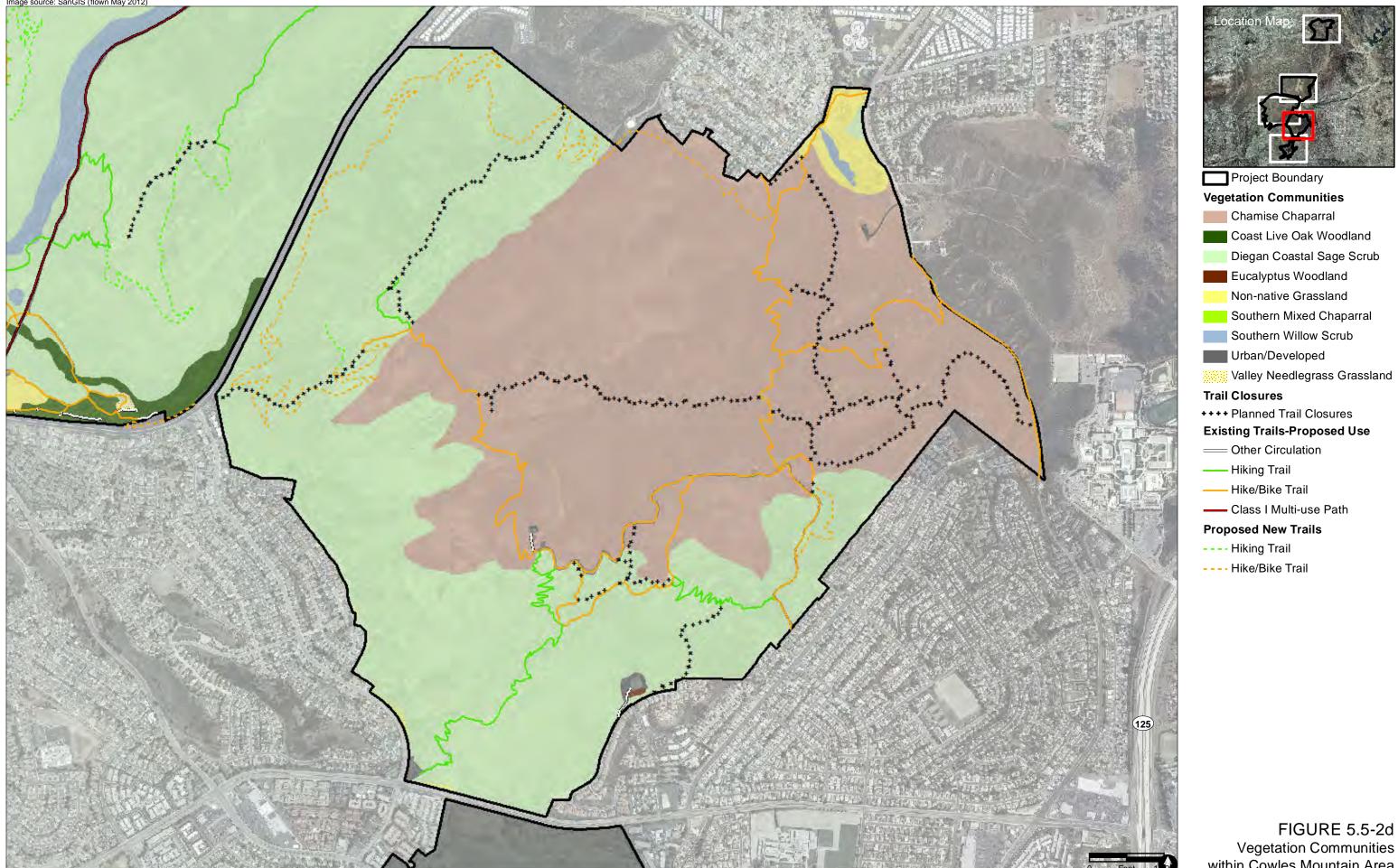




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FIGURE 5.5-2b Vegetation Communities within East Elliot Area





Vegetation Communities within Cowles Mountain Area

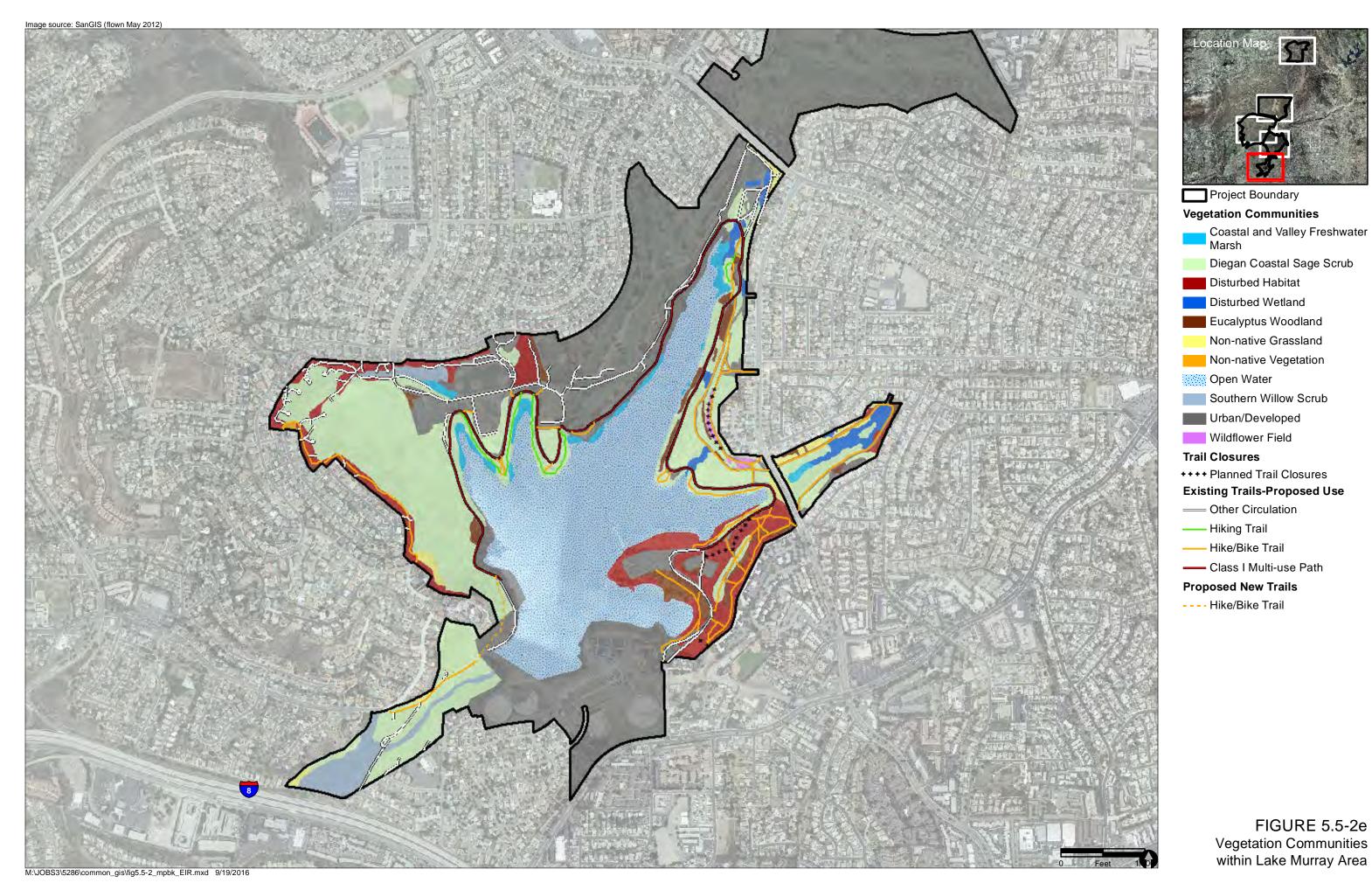


FIGURE 5.5-2e Vegetation Communities within Lake Murray Area

b. San Diego Association of Governments Vegetation Communities

Vegetation community classifications below follow the San Diego Association of Governments. Under this system, vegetation communities are first classified into groups by similarities in diagnostic growth forms reflecting local environmental conditions (Table 5.5-2).

Table 5.5-2 San Diego Association of Governments Vegetation Groups within Study Area		
Vegetation Group	Acres	
Hydrophytic Herbaceous Vegetation	12.2	
Riparian Forests and Woodlands	242.2	
Riparian Shrublands	177.8	
Sclerophyllous, Evergreen Shrublands	3,603.1	
Soft-leaved, Drought-deciduous Shrublands	3,512.2	
Upland Forests and Woodlands	79.4	
Upland Herbaceous Vegetation	1,306.7	

Within these groups, vegetation communities are further divided into alliances, which are classified by the dominant or co-occurring species. Subsequently, a subset of diagnostic plants within each alliance is referred to as associations. A total of 7 groups, 38 alliances, and 40 associations were mapped within the study area.

5.5.2.2 Plant Species

The study area contains a high diversity of plant species resulting from the multiple niches created by complex topography, soils, and its geographic location in coastal San Diego County. The geology and soil types, which can provide biological indicators for plant species and related habitat types, are depicted in Figures 5.9-1 and 5.9-2 of Section 5.9, Geology.

The study area currently supports a total of 244 plant species, representing 61 plant families. Of this total, 196 (80 percent) are species native to southern California, and 52 (20 percent) are introduced species. Of these introduced species, the California Invasive Plant Council (Cal-IPC) has listed 2 as "high" (severe ecological damage potential), 19 as "moderate" (significant, but not severe, ecological damage potential), and 9 as having "limited" (minor ecological damage potential) (Cal-IPC 2012). A detailed list of plant species that have been observed/detected in the study area is in the NRMP.

Figure 5.8-1 in Section 5.8, Hydrology and Water Quality, depicts the watershed and hydrology in the Park area, which can provide biological indicators for plant species and habitat types.

5.5.2.3 Wildlife Species

The study area currently supports a diverse wildlife population, including at least 26 mammals, 101 birds, 17 reptiles and amphibians, and more than 600 invertebrate species (San Diego Natural

History Museum 2009). The diversity of animal species observed or expected to occur within the study area is typical of large, ecologically connected open space areas with a mix of coastal sage scrub, chaparral, grassland, and riparian woodland habitats in coastal San Diego County. The entire list of wildlife species that have been observed/detected in the study area are listed in the NRMP. The study area's variety of habitats, topography, and hydrologic features further enhance this diversity:

- *Open grasslands* provide burrowing opportunities for many reptiles and small mammals, as well as foraging opportunities for many raptors.
- *Scrub communities* provide habitat for a wide variety of reptile, mammal, and avian species, and often include steeper topography and rocky outcrops.
- *Riparian corridors* provide a perennial water source for amphibians, mesic reptiles, riparian birds, and foraging mammals.
- Steep cliff faces host at least four bat species and provide shelter for nesting avian species.

5.5.2.4 Wildlife Corridors

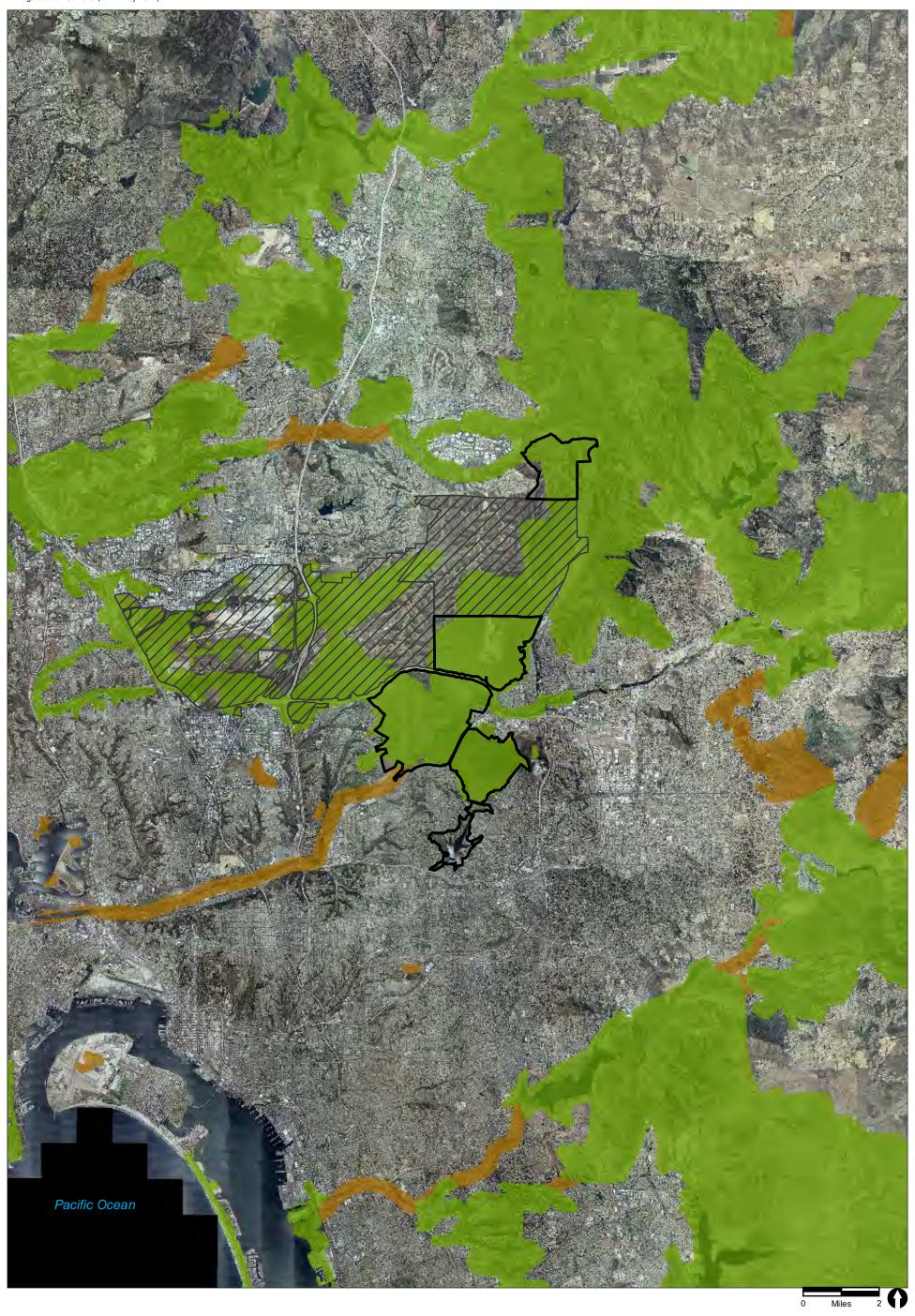
a. Regional Connectivity

Maintaining connectivity amongst core MSCP areas as well as to lands within the greater southern California region is essential for maintaining the biodiversity of the MHPA and resilience of species and natural communities in San Diego (San Diego Management and Monitoring Program [SDMMP] 2010). As shown in Figure 5.5-3, regionally, the study area is a critical regional open space link for the movement of animals between inland natural areas surrounding Marine Corps Air Station (MCAS) Miramar, west through Sycamore Canyon Preserve and various County parks in the Central Poway/San Vicente Reservoir/North Poway Core Resource Area, and eventually east to the Cleveland National Forest (Ogden Environmental 1998, Western Tracking Institute [WTI] 2010).

b. Corridor Constraints

The Park's areas are separated by man-made and topographic boundaries, and as a result, has varying levels of urban edge and connectivity (Table 5.5-3).

Table 5.5-3 Preserve-Level Adjacency to Open Space within Study Area			
	% of Area Bounded by	MSCP Core	
Park Subarea	Developed Lands	Resource Area?*	
Lake Murray	100	No	
Cowles Mountain	85	Yes	
Mission Gorge	24	Yes	
Fortuna Mountain	29	Yes	
East Elliott	47	Yes	
West Sycamore	8	Yes	
*Reproduced from Table 2-2 of City MSCP Subarea Plan.			



Project Boundary
MCAS Miramar

Generalized Core and Linkage Areas
(MSCP 1998)

Core Resources
Habitat Linkages

FIGURE 5.5-3

The Lake Murray area, while containing some significant biological resources, is not within an established MSCP Core Resource Area and is entirely bounded by developed lands abutting the Cowles Mountain area to the north. Natural vegetation between the Lake Murray and Cowles Mountain areas are separated by a golf course and two paved roads (Jackson Drive and Navajo Road). The Cowles Mountain area is within a Core Resource Area, and is approximately 85 percent bounded by developed lands and abuts the Mission Gorge area to the northwest. The Cowles Mountain and Mission Gorge areas are separated by Mission Gorge Road, a four-lane highway (Figure 5.5-4).

The Mission Gorge area is approximately 24 percent bounded by developed lands, is within a Core Resource Area, and directly abuts open space to the southeast and northwest. The Fortuna Mountain area has developed lands on 29 percent of its boundaries and is adjacent to the Mission Gorge area along its southeastern border and East Elliott to the north. The Fortuna Mountain and East Elliott areas are separated by State Route 52 (SR-52; see below). The East Elliott area shares 47 percent of its boundaries with developed lands, including the City of Santee to the east and the Sycamore Landfill internally. East Elliott is bordered to the north by MCAS Miramar, which is predominantly open space and separates East Elliott from West Sycamore. The West Sycamore area is bounded by MCAS Miramar to the south, the Goodan Ranch Preserve to the east, and development to the northwest.

In 2010, the Western Tracking Institute (WTI) conducted a study on the presence and movement of mammals within the Park. Although mMammal populations were observed to be plentiful and relatively diverse, with a robust prey and forage base throughout MTRP. some cConcern was noted regarding internal constraints to wildlife movement, with particular emphasis on Mission Gorge Road and the wildlife crossing beneath SR-52 (WTI 2010). Large, MSCP-covered mammals with extensive home ranges, such as mountain lion (Puma concolor) and mule deer (Odocoileus hemionus), require these crossings to extend foraging ranges and facilitate gene flow between disparate populations. In 2015/2016 the Wildlife Tracking Company provided a preliminary assessment of the proposed trail segment within Oak Canyon. In January 2018, the Wildlife Tracking Company conducted a subsequent assessment of a proposed trail realignment to address concerns raised during public review relative to wildlife use and movement within the East Elliott area of the Park. Findings associated with these assessments are provided below.

SR-52 is an eight-lane highway which bisects the Park between the East Elliott and Fortuna Mountain areas, and poses an existing constraint on connectivity between the existing Park areas and open space to the north (East Elliott and West Sycamore expansion areas). A total of seven wildlife undercrossings beneath SR-52 currently exist and limit the effects of habitat fragmentation to a number of species (WTI 2010). As shown in Figure 5.5-4, these existing crossings west to east are (1) the SR-52 "wildlife tunnel," (2) the Oak Canyon Bridge undercrossing, (3) the Spring Canyon Bridge undercrossing, (4) the Mast Boulevard culverts, (5) the eastern San Diego River course, and (6 and 7) two small culverts. Of these seven crossings, two (Oak Canyon Bridge undercrossing and Spring Canyon Bridge undercrossing) are considered viable movement corridors for large mammals. The "wildlife tunnel" and Mast Boulevard culverts undercrossings are in need of enhancement or maintenance; the remaining wildlife undercrossings are not in current need of management action.

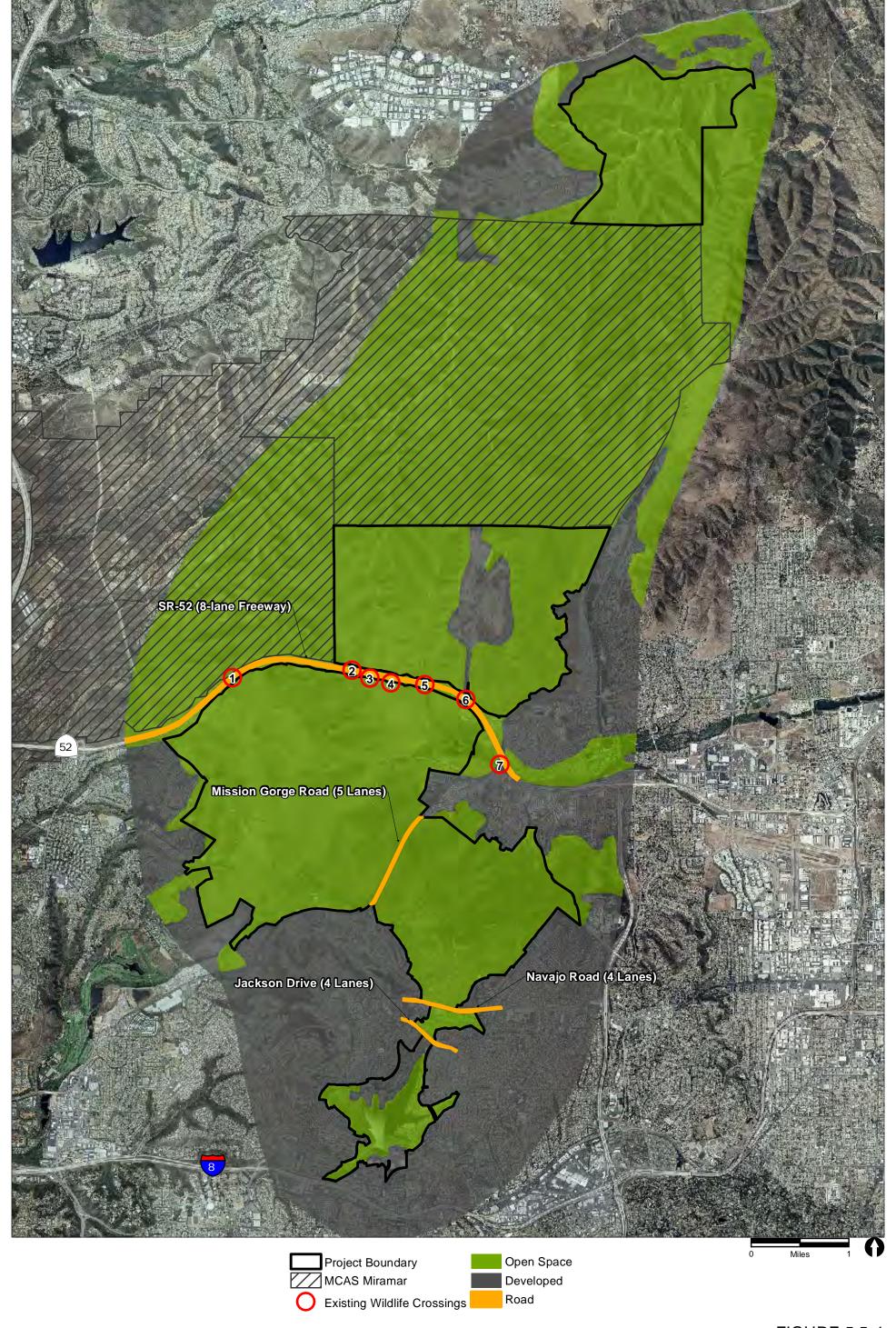


FIGURE 5.5-4
Preserve-level Connectivity within Study Area

5.5.2.5 Sensitive Biological Resources

a. Sensitive Vegetation Communities

Sensitive vegetation communities are those that are of highly limited distribution, and may also support concentrations of sensitive plant or wildlife species. Upland communities within the MSCP are divided into four tiers of sensitivity based on rarity and ecological importance. Tiers I, II, and III are considered sensitive and thus impacts to these vegetation communities within the study area would require mitigation (Table 5.5-4). Tier IV includes non-sensitive lands, such as disturbed habitat and urban/developed lands; impacts to Tier IV lands do not require mitigation.

Table 5.5-4 Sensitive Upland Vegetation Communities within Study Area			
Tier	Holland Vegetation Community	Acres	
Tier l (rare uplands)	Native Grassland Valley Needlegrass Grassland Wildflower Field	19.9	
Tier II (uncommon uplands)	Diegan Coastal Sage Scrub	3,545.1	
Tier IIIA (common uplands)	Chamise Chaparral Southern Mixed Chaparral Scrub Oak Chaparral	3,490.2	
Tier IIIB (common uplands)	Non-native Grassland	1,161.0	

All wetland vegetation communities within the study area, including vernal pools, are considered sensitive and are regulated by the City, as well as U.S. Army Corps of Engineers (USACE), CDFW, and Regional Water Quality Control Board (RWQCB) (Table 5.5-5). Site-specific analysis would be required for any subsequent project implemented in accordance with the Plans to determine which agencies would have regulatory authority on basins with fairy shrimp.

Table 5.5-5 Wetland/Riparian Vegetation Communities Within Study Area		
Vegetation Community	Acres	
Southern Willow Scrub	236.2	
Southern Riparian Scrub	176.4	
Open Water	149.3	
Coastal and Freshwater Marsh	4.3	
Mule Fat Scrub	1.4	
San Diego Mesa Vernal Pool	0.8	

b. Sensitive Species

A plant or wildlife species is considered sensitive if it: (1) is listed by state or federal agencies as threatened or endangered or is a candidate or proposed for such listing; (2) is considered rare, endangered, or threatened by the State of California and/or listed in the California Natural Diversity Database (CNDDB; State of California 2012a, 2012b, 2011a, 2011b); (3) is a narrow endemic or covered species in the City of San Diego MSCP Subarea Plan (City of San Diego 1997); (4) has a California Native Plant Society (CNPS) Rare Plant Ranking of 1B or 2 in the *Inventory of Rare and Endangered Vascular Plants of California* (CNPS 2012); or (5) is considered rare, sensitive, or noteworthy by local conservation organizations or specialists. Noteworthy plant species are considered to be those that have a CNPS Rare Plant Ranking of 3 and 4 in the *Inventory*.

The study area contains 23 sensitive plant species and 41 sensitive wildlife species, including 7 plant species and 16 wildlife species covered by the MSCP (Tables 5.5-6 and 5.5-7) Plant and wildlife species identified within the Park boundaries are provided as Appendix A-A and Appendix A-B of the NRMP.

Table 5.5-6				
Sensitive Plant Species Observed within Study Area*				
	G :	CNPS	Federal/	City of San
Common Name	Scientific Name	Rank	State	Diego
San Diego thornmint	Acanthomintha ilicifolia	1B.1	FT/CE	NE, MSCP
San Diego ambrosia	Ambrosia pumila	1B.1	FE	NE, MSCP
San Diego sagewort	Artemisia palmeri	4.2	-	-
San Diego sunflower	Bahiopsis (=Viguiera) lacinata	4.2	-	-
San Diego goldenstar	Bloomeria clevelandii	1B.1	-	MSCP
Orcutt's brodiaea	Brodiaea orcuttii	1B.1	-	MSCP
Peninsular spineflower	Chorizanthe leptotheca	4.2	-	-
Delicate clarkia	Clarkia delicata	1B.2	-	-
C l . II	Comarostaphylis diversifolia	40.0		-
Summer holly	ssp. diversifolia	1B.2	-	
Western dichondra	Dichondra occidentalis	4.2	-	ı
Variegated dudleya	Dudleya variegata	1B.2	-	NE, MSCP
Graceful tarplant	Holocarpha virgata ssp. elongata	4.2	-	-
Decumbent goldenbush	Isocoma menziesii var. decumbens	1B.2	-	-
San Diego marsh elder	Iva hayesiana	2.2	-	-
San Diego barrel cactus	Ferocactus viridescens	2.1	-	MSCP
Robinson's pepper grass	Lepidium virginicum var. robinsonii	1B.2	-	-
Willowy monardella	Monardella viminea	1B.1	FE/CE	MSCP
California adder's-tongue fern	Ophioglossum californicum	4.2	-	ı
Nuttall's scrub oak	Quercus dumosa	1B.1		-
Chaparral ragwort	Senecio aphanactis	2.2	-	-
Purple stemodia	Stemodia durantifolia	2.1	-	-
San Diego County needlegrass	Stipa [=Achnatherum] diegoensis	4.2	-	-
Rush-like bristleweed	Xanthisma juncea	4.3	-	-

FEDERAL CANDIDATES AND LISTED PLANTS

STATE LISTED PLANTS

Federally listed endangered State listed endangered FT Federally listed threatened CR = State listed rare FC Federal candidate for listing as endangered or threatened CT = State listed threatened

CALIFORNIA NATIVE PLANT SOCIETY (CNPS) LISTS

- Species presumed extinct.
- 1B = Species rare, threatened, or endangered in California and elsewhere. These species are eligible for state
- Species rare, threatened, or endangered in California but more common elsewhere. These species are eligible for state listing.
- Species for which more information is needed. Distribution, endangerment, and/or taxonomic information is needed.
- A watch list of species of limited distribution. These species need to be monitored for changes in the status of their populations.

CITY OF SAN DIEGO

Narrow endemic

Multiple Species Conservation Program covered species MSCP =

*Species included in this table are those observed during biological surveys. Additional sensitive species documented to occur within the project area include Ceanothus verrucosus (CNPS List 2B.2), Juncus acutus subsp. leopoldii (CNPS List 4.2), Quercus engelmannii (CNPS List 4.2), Artemisia palmeri (CNPS List 4.2), and Fremontodendron mexicanum (CNPS List 1B.1) Additional taxa with CNPS inventory listings are identified in the Checklist of Vascular Plants of Mission Trails Regional Park (Simpson and Rebman 2016).

Table 5.5-7			
	dlife Species Observed within Study Are Scientific Name	Federal/	MSCP <u>or</u> <u>VPHCP</u>
Common Name Invertebrates	Scientific Name	State	Covered?
San Diego fairy shrimp	Branchinecta sandiegonensis	FE	No Yes
Hermes copper butterfly	Lycaena hermes	CSA	No
Quino checkerspot butterfly	Euphydryas editha quino	FE	No
Amphibians	Lupnyaryas eanna quino	ΓL	INO
Western spadefoot toad	Spea hammondii	CSC	No
Reptiles	Spea Hammonan	CSC	NO
Belding's orange-throated whiptail	Aspidoscelis hyperthra beldingi	CSC	Yes
Coastal western whiptail	Aspidoscelis tigris stejnegeri	CSA	No
Southern Pacific pond turtle	Actinemys marmorata pallida	CSC	Yes
Coronado skink	Eumeces skiltonianus interparietalis	CSC	No
San Diego horned lizard	Phrynosoma coronatum blainvillii	CSC	Yes
Coast patch-nosed snake	Salvadora hexalepis virgultea	CSC	No
Two-striped garter snake	Thamnophis hammondi	CSC	No
Northern red diamond rattlesnake	Crotalus ruber	CSC	No
Birds	Crotaius rubei	CSC	NO
Cooper's hawk	Accipiter cooperi	CSA	Yes
Southern California rufous-crowned	Aimophila ruficeps canescens	CSC	Yes
sparrow	Annophila rajiceps canescens	CSC	163
Golden eagle	Aquila chrysaetos canadensis	CSC, CFP	Yes
Grasshopper sparrow	Ammodramus savannarum	CSC CSC	No
Great blue heron	Ardea herodias	CSA	No
Coastal cactus wren	Campylorhynchus brunneicapillus couesi	CSC	Yes
Great egret	Casmerodius albus	CSA	No
Northern harrier	Circus cyaneus	CSC	Yes
Yellow warbler	Dendroica petechia	CSC	No
White-tailed kite	Elanus leucurus	CFP	No
Southwestern willow flycatcher	Empidonax traillii extimus	FE/SE	Yes
California horned lark	Eremophila alpestris actia	CSC	No
Peregrine falcon	Falco peregrinus anatum	SE, CFP	Yes
Yellow-breasted chat	Icteria virens	CSC	No
Black-crowned night heron	Nycticorax nycticorax	CSA	No
Double-crested cormorant	Phalacrocorax auritus albociliatus	CSC	No
California gnatcatcher	Polioptila californica californica	FT, CSC	Yes
Western bluebird	Sialia mexicana occidentalis		Yes
Light-footed clapper rail	Rallus longirostris levipes	FE/SE, CFP	Yes
Least Bell's vireo	Vireo bellii pusillus	FE/SE	Yes
Mammals	vii eo beiiii pusiiius	I L/JL	162
Dulzura California pocket mouse	Chaetodipus californicus femoralis	CSC	No
•	Chaecoalpas canjornicas jemorans	CSC	INU
Northwestern San Diego pocket	Chaetodipus fallax fallax	CSC	No
mouse Western mastiff bat	Eumops perotis californicus	CSC	No
Western red bat	Lasiurus blossevillii	CSC	No
vvesterii reu pat	LUSIUI US DIUSSEVIIIII	CSC	INU

Table 5.5-7 Sensitive Wildlife Species Observed within Study Area					
		Federal/	<u>VPHCP</u>		
Common Name	Scientific Name	State	Covered?		
San Diego black-tailed jackrabbit	Lepus californicus bennettii	CSC	No		
Southern mule deer	Odocoileus hemionus fuliginata	-	Yes		
Mountain lion	Puma concolor	CFP	Yes		
Pocketed free-tailed bat	Nyctinomops femorosacca	CSC	No		
Big free-tailed bat	Nyctinomops macrotis	CSC	No		

FEDERAL/STATE

FE = Federally listed endangered

FT = Federally listed threatened SE = State listed endangered

CSC = California Department of Fish and Game species of special concern

CSA = California Department of Fish and Game Special Animal

CFP = California fully protected species

<u>VPHCP = City of San Diego Vernal Pool Habitat Conservation Plan</u>

5.5.2.6 Threats to Sensitive Biological Resources

The NRMP identifies specific, preserve-level threats to sensitive species and habitats that occur within the study area. Although direct habitat loss due to development is not a threat within conserved lands, habitat degradation and other indirect impacts due to both natural and anthropogenic threats continue to affect native species within the study area. Threats are organized and analyzed below based on their scale and, consequently, the ability of preserve-level management actions effectiveness. For example, although climate change may pose a regional threat to some sensitive species, individual management actions taken at the Park to combat climate change are not expected to be at the scale necessary to address the threat.

a. Human Use of Preserves

Recreational uses can impact natural resources within the Park through erosion, habitat fragmentation, trampling, and the invasion of non-native plant species associated with trail building and their use. Recreational use stressors can differ in intensity and extent depending on whether use is authorized or unauthorized. Current recreational uses at the Park include mountain biking, rock climbing, horseback riding, hiking, running (group events and individual runners), birding, and geocaching.

Trail-associated recreation creates long, linear impacts with relatively small widths. Trail widening and migration may occur as a result of group events where participants crowd trails. Impacts include:

- Soil disturbance especially during off-trail use and/or when the substrate is saturated;
- Trampling damage to plant material;
- Compacted soils which may inhibit root growth from adjacent vegetation and/or seedling recruitment;

- Introduction vector for invasive plant species (such as weed seeds transported via dirt clods in bike treads or weed seeds found in horse feces);
- Significant negative effects on wildlife corridors, especially when recreation occurs at night when many large mammals are active; and
- Local fragmentation of the distribution of species sensitive to edge effects, the presence of humans, and/or associated domestic animals and recreational equipment.

Educating visitors about proper trail etiquette, designing trails to avoid sensitive resources, limiting authorized trail access to daylight hours, having clearly posted regulations, and having a clear patrol and violation enforcement strategy can help reduce some of the risks posed by recreation.

b. Invasive/Exotic Species

Exotic species threaten natural resources within the Park through direct competition with native species, habitat degradation, and the introduction of disease.

Plant Species

Invasive plant species have the potential to displace and dominate native species, hybridize with native plant species, provide food and habitat for invasive animal species, and disturb normal ecosystem functions such as nutrient cycling, wetland hydrology, sedimentation, fire frequency, and erosion (Brossard et al. 2000). Disturbances, such as fire, mammal burrowing, recreational activities, and development adjacent to natural open space, create opportunities for non-native species to invade and establish themselves. The Park contains a matrix of recreational trails, maintenance roads, and utility rights-of-way and, consequently, opportunities for the introduction and establishment of invasive species.

Wildlife Species

Populations of native plants and animals can be significantly disrupted by the introduction of exotic wildlife and domestic animals into intact and disturbed habitats at the Park. Domestic animals, such as dogs, cats, and horses, have been shown to be linked with increased weed cover and density (via nutrients and seeds found in feces) (Bureau of Land Management 2012). Exotic wildlife and domestic animals can threaten multiple species of native flora and fauna through direct predation, competition for resources, the introduction of disease, and eutrophication of water sources. Examples of exotic wildlife species observed within the study area include brown-headed cowbirds, black rats (*Rattus rattus*), bullfrogs (*Rana catesbeiana*), and Argentine ants (*Linepithema humile*).

Altered Fire Regime

Southern California plant and wildlife species have evolved strategies to cope with fire, and some even require fire to complete part of their life cycle (Keeley et al. 2008). However, with the increase of human activities, fire frequency has increased in some areas within the Park. This has altered the plant community structure at the Park through species loss and type conversion. The secondary effects of frequent fire are increased erosion, increased sediment load, alteration of hydrology, habitat conversion, and invasion of exotic plant species.

Altered Hydrology

Hydrology plays a major role in the formation and/or sustainability of many habitats. When a watershed is significantly altered, peak flow rates and flow duration can change the overall character of the stream bed and the associated vegetation community (Poff et al. 1997). Increased hydrological flows due to very high rainfall (2005) after the Cedar fire (2003) have been implicated in the destruction of habitat for a population of willowy monardella within the West Sycamore area (B. Miller, pers. comm. 2011).

Habitat Fragmentation

Habitat fragmentation limits habitat areas, isolates populations, reduces dispersal and gene flow, and degrades habitat quality through edge effects. When species are isolated by physical barriers such as roads, trails, urban areas, and utility rights-of-way, the ability of meta-populations to interbreed or cross-pollinate is reduced, leading to lower genetic variability which puts them at risk of localized extinction.

Regional habitat fragmentation at the Park is managed by the maintenance of linkages to adjacent biological core areas. Preserve-level fragmentation (caused by roadways, facilities, trails, and utility rights-of-way) at the Park is managed by minimization of local fragmentation stressors (i.e., the reduction of trail redundancies and rerouting of existing trails away from habitats which are sensitive to local fragmentation and associated edge effects).

c. Region-wide Threats

Region-wide threats are those that occur at large spatial scales and, though they may be identified as significant contributors to overall species population decline, are outside of the geographic and jurisdictional scope of Park managers. Management of regionwide threats requires region-wide actions, and thus are not a significant portion of the management actions contained within the NRMP. Region-wide threats to sensitive species and vegetation communities within the study area include habitat loss, urban runoff, drought, utility and service lines, and pests and disease.

5.5.2.7 Management Prioritization

A prioritization system for management actions was developed for species and habitats at the Park using survey data, information gleaned from a thorough literature review, and the combined knowledge of City biologists and rangers, members of the Institute of Ecological Monitoring and Management at San Diego State University, and RECON biologists. The sensitive species and management guilds within the study area were prioritized based on regional threat level (spatial and temporal), preserve threat level, and the ability to effectively manage threats at the Park.

Using these criteria, the priority sensitive species identified by the NRMP include:

- San Diego thornmint
- San Diego ambrosia
- Variegated dudleya
- Willowy monardella
- Coastal cactus wren

In order to more efficiently manage natural resources at the Park, sensitive habitats have been grouped into geographic areas based on threat type similarities. Each of these "management guilds" were used in the NRMP to coordinate threat treatment across several sensitive species and vegetation types. Priority management guilds identified by the NRMP include:

- Tierrasanta clay ridges
- East Elliott clay ridgelines
- Riparian woodlands
- Cliffs and rock outcrops
- Artemisia-dominated coastal sage scrub

For both the priority species and management guilds, the NRMP fully details the background, MSCP conditions of coverage, presence in the Park, anthropogenic threats, management goals and objectives, monitoring, and minimization of impacts due to management and monitoring activities.

5.5.3 Significance Determination Thresholds

Based on the City's 2016 Significance Determination Thresholds, that have been adapted to guide a programmatic analysis for implementation of the Plans and associated discretionary actions, impacts related to biological resources would be significant if implementation of the Plans and associated discretionary actions would:

- 1. Result in a reduction in the number of any unique, rare, endangered, sensitive, or fully protected species of plants or animals;
- 2. Result in interference with the nesting/foraging/movement of any resident or migratory fish or wildlife species;
- 3. Result in an impact to a sensitive habitat, including, but not limited to streamside vegetation, oak woodland, vernal pools, wetlands, coastal sage scrub, or chaparral;
- 4. Result in the introduction of invasive species of plants into the area; or
- 5. Result in an impact on City, state, or federally regulated wetlands (including, but not limited to, salt marsh, vernal pool, lagoon, riparian habitat, etc.) through direct removal, filing, hydrological interruption, or other means.

5.5.3.1 Criteria for Evaluating Biological Resources

Potential impacts to biological resources are evaluated through review of the project's consistency with the City's LDC ESL Regulations and Biology Guidelines (2012, 2018b) as well as the MSCP Subarea Plan (1997). Before a determination of the significance of an impact can be made, the presence and nature of the biological resources would be established.

The criteria for evaluating a project's impact on biological resources resulting from implementation of the Plans and associated discretionary actions would depend on whether:

- The site has been identified as part of the MHPA by the Subarea Plan.
- The site supports or could support Tier I, II, IIIA and B vegetation communities (such as grassland, chaparral, coastal sage scrub).
- The site contains, or comes within 100 feet of, a natural or man-made drainage (determine whether it is vegetated with wetland vegetation). The site lies within the 100-year floodplain established by the Federal Emergency Management Agency and the Floodplain Fringe/Floodway zones.
- The site does not support a vegetation community covered under the MSCP; however, important wildlife species may use the site for a corridor, etc.

5.5.3.2 Biological Impacts

Once it has been established that biological resources are present on a project site, further analysis of a project's direct and/or indirect impact to biological resources would be required and a determination of significance made with respect to the resource being impacted.

Direct effects include, but are not limited to, the following impacts:

a. Direct Impacts

- Any encroachment in the MHPA is considered a significant impact to the preservation goals
 of the MSCP. Any encroachment into the MHPA (in excess of the allowable encroachment by
 a project) would require a MHPA boundary adjustment which would include a habitat
 equivalency assessment and concurrence by the Wildlife Agencies to ensure that lands
 added to the MHPA would be at least equivalent to what would be removed.
- Lands containing Tier I, II, IIIA, and IIIB habitats and all wetlands are considered sensitive and declining habitats. Impacts to these resources may be considered significant.
- Impacts to individual sensitive species, outside of any impacts to habitat, may also be
 considered significant based upon the rarity and extent of impacts. Impacts to state or
 federally listed species and all narrow endemics should be considered significant.
- Certain species covered by the MSCP and other species not covered by the MSCP may be considered significant on a case-by-case basis taking into consideration all pertinent information regarding distribution, rarity, and the level of habitat conservation afforded by the MSCP.

b. Indirect Impacts

Indirect effects include, but are not limited to the introduction of urban meso-predators, domestic animals, urban runoff, or invasive exotic plant species into a biological system; noise and lighting

impacts, alteration of a dynamic portion of a system, such as stream flow characteristics or fire cycles; or loss of a wetland buffer that includes no environmentally sensitive lands.

5.5.4 Impact Analysis

Issue 1: Sensitive Plant and Wildlife Species

Would implementation of the Plans and associated discretionary actions result in a reduction in the number of any unique, rare, endangered, sensitive, or fully protected species of plants or animals?

As discussed in Chapter 3, Project Description, the Plans do not propose specific development at this time. The Plans have been developed as an integrated set of management guidelines for the Park, with the MPU focusing on public access and recreation and the NRMP focusing on sensitive biological resources.

The NRMP provides management goals and objectives in order to protect sensitive plant and wildlife species. For example, one goal is to establish and sustain a persistent population of coastal cactus wren within the West Sycamore area (Figure 5.5-5). In order to accomplish this goal, the specific management objectives are to:

Objective 1: Reduce combustible fuels within the Cactus Wren Management Area

Objective 2: Enhance and expand cacti distribution and density within the Cactus Wren Management Area

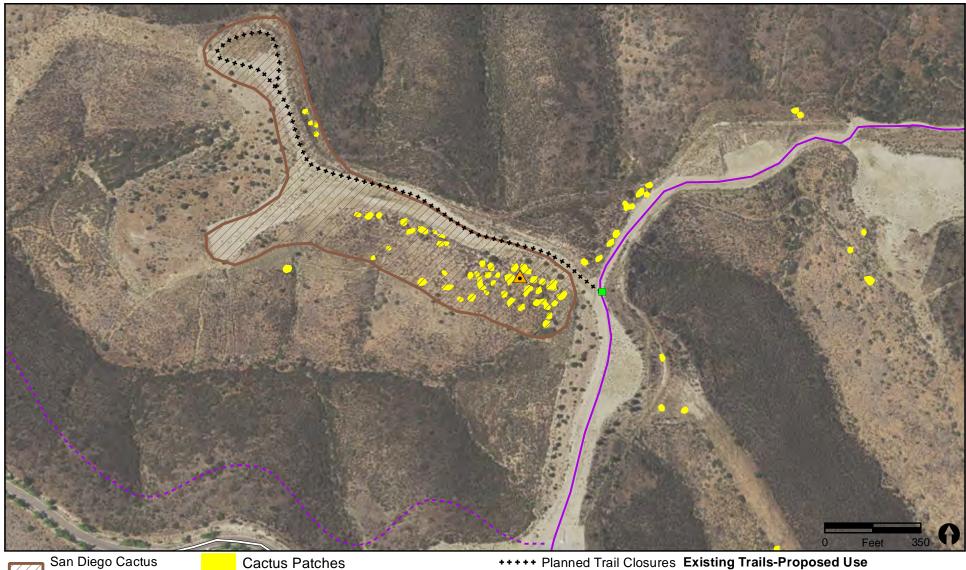
Objective 3: Trail reroute (to avoid the Cactus Wren Management Area)

The NRMP then sets forth specific monitoring and survey requirements in order to document management results. For the coastal cactus wren, this includes:

- Conduct presence/absence coastal cactus wren surveys annually
- Establish photo points within and facing vegetation management areas
- Use the relevé method to quantitatively sample and monitor vegetation within Cactus Wren Management Area

This is merely one example of the priority sensitive species identified by the NRMP; it also sets forth such specific actions for four other sensitive plant species, as well as five other management guilds that support sensitive plant and wildlife species (i.e., riparian woodlands support least Bell's vireo and southwestern willow flycatcher).

Various MPU recommendations detail trail closures and reroutes based on findings in the NRMP in order to avoid impacting sensitive habitat that supports such species. For example, MPU Recommendation MG-R11 for the Mission Gorge area states: "Close and restore the western Kwaay Paay access trail from the Old Mission Dam staging area to avoid direct conflicts with the protection of San Diego ambrosia."



Wren Management Area

- •Brush Management
- •Exotic Species Removal •Cacti Transplantation

Cactus Patches

San Diego Cactus Wren (Campylorhynchus brunneicapillus couesi)

Proposed Exclusionary Signage

Proposed New Trails

---- Multi-use Trail

Other Circulation

Multi-use Trail

FIGURE 5.5-5 San Diego Cactus Wren Management Actions: West Sycamore The MPU also specifies other actions in order to protect sensitive species. For example, MPU Recommendation FM-H2 states: "Install and maintain 'Sensitive Habitat Keep Out' signage along the trails nearest the Southwest Boundary Quarry and the Visitor Center Loop Quarry to protect the significant bat roosts that exist in these locations and issue warnings or citations to all violators."

The MPU recommendations also contemplate subsequent projects such as new trails, recreational amenities, and associated facilities. These types of subsequent projects have the potential to result in impacts to sensitive plant and wildlife species. For example, Recommendation CM-F1 states: "Plan, design and implement an off-street gravel or decomposed granite surfaced parking area with street improvements that comply with public road standards as applicable, at the Barker Way entrance to reduce some of the parking demand on the local residential streets and provide more a formal trailhead and potential for a maintainable comfort station. Ensure that temporary construction impacts associated with parking area improvements do not affect adjacent neighbors and park users."

Diegan coastal sage scrub, a sensitive vegetation community that sensitive plant and wildlife species often utilize, is conceptually mapped adjacent to this area. Types of sensitive plant species that could be found within this habitat include San Diego barrel cactus, San Diego golden star, or variegated dudleya. Sensitive wildlife species found within this habitat could include coastal California gnatcatcher, southern California rufous-crowned sparrow, or Belding's orange-throated whiptail. All of these species are covered under the City's MSCP Subarea Plan and if present in a subsequent project, impacts would be potentially significant and require mitigation.

Due to the fact that portions of the biological resource assessment are based on secondary source information rather than site-specific field surveys, the impacts would be refined for subsequent projects as they are proposed, such as the parking area example above. Site-specific surveys would be conducted for future project-level review to verify the presence of sensitive plant or wildlife species occurring within the study area and to determine the extent of any potential impacts.

a. Direct Impacts to Sensitive Plants

The management actions identified in the NRMP would not result in direct impacts to sensitive plant species. The NRMP intends to actively manage and protect sensitive plant species. Although some management actions involve revegetation or transplantation activities that may potentially result in accidental disturbance, minimization measures specified within the NRMP would be adhered to prior to implementation. The MPU is analyzed below.

Subsequent projects contemplated within the <u>MPU-Plans</u> have the potential to impact 23 sensitive plant species known to occur within the study area (see Table 5.5-6). Seven of the plant species are federally, state, or City of San Diego listed species:

- San Diego thornmint
- San Diego ambrosia
- Variegated dudleya
- Willowy monardella
- San Diego goldenstar
- Orcutt's brodiaea
- San Diego barrel cactus

Precise locations of sensitive plant species would be identified through site-specific biological surveys in conjunction with future development. It should be noted that specific management actions were developed within the NRMP in order to proactively protect several of these species.

Potential impacts to sensitive plants species due to subsequent projects implemented in accordance with the MPU-Plans would be significant (Impact BIO-1); therefore, mitigation would be required.

b. Direct Impacts to Sensitive Wildlife

The management actions identified in the NRMP would not result in direct impacts to sensitive wildlife species. The NRMP intends to actively manage and protect sensitive wildlife species. The MPU is analyzed below.

Implementation of the MPU recommendations has the potential to impact sensitive wildlife species known to occur within the study area. Precise locations of sensitive wildlife species and suitable habitat would be identified through on-site reconnaissance in conjunction with future development. Impacts to the any of the species discussed below would be significant (Impact BIO-2).

Federally Listed Endangered Species

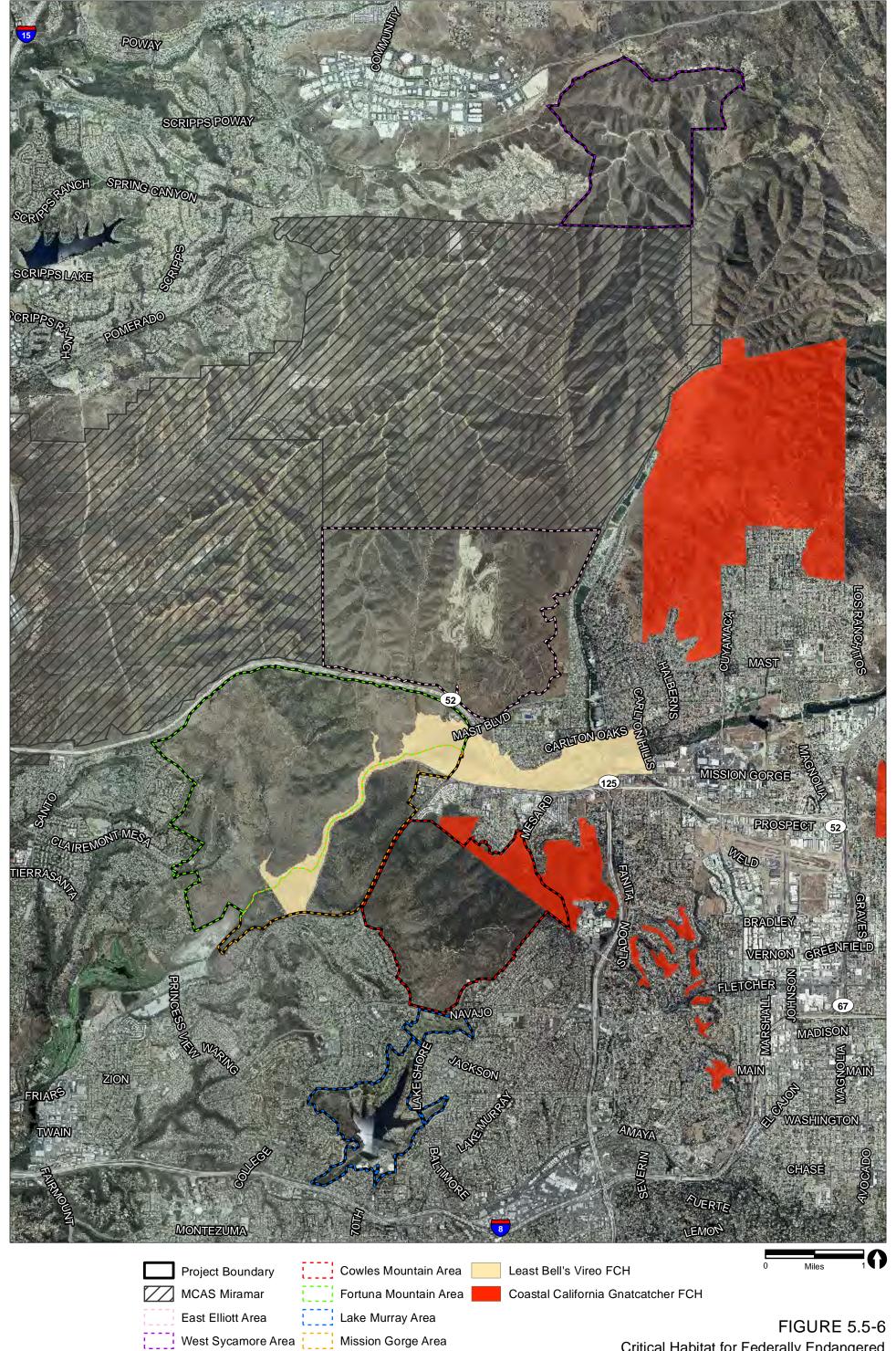
The federally endangered San Diego fairy shrimp, Quino checkerspot butterfly, light-footed clapper rail, least Bell's vireo, and southwestern willow flycatcher could be impacted by subsequent projects implemented in accordance with the MPU. Of these species, designated critical habitat for least Bell's vireo occurs within the study area (Figure 5.5-6).

The City relinquished has federal coverage of the San Diego fairy shrimp in the MSCPthrough the VPHCP, but has retained and state coverage through the MSCP. The Quino checkerspot butterfly is also a federally listed endangered species and a non-covered species in the MSCP. Impacts to San Diego fairy shrimp and Quino checkerspot butterfly species must be approved by USFWS under Section 7 or 10 of the Federal Endangered Species Act (FESA).

Impacts to light-footed clapper rail, least Bell's vireo, and southwestern willow flycatcher must comply with the provisions of the MSCP. The MSCP sets forth provisions in order for projects to comply with the FESA for covered species. These provisions would be required for subsequent projects to avoid impacts to the light-footed clapper rail, least Bell's vireo, and southwestern willow flycatcher.

Federally Listed Threatened Species

The coastal California gnatcatcher, a federally listed threatened species, CDFW listed species of special concern, and MSCP covered species, occurs within the study area. There is also designated critical habitat for this species within the study area (see Figure 5.5-6). The MSCP sets forth provisions in order for projects to comply with the FESA for this species. These provisions would be required for subsequent projects to avoid impacts to coastal California gnatcatcher.



State Listed Endangered Species

Light-footed clapper rail, least Bell's vireo, and southwestern willow flycatcher are also state listed endangered species. In addition, peregrine falcon is a state listed endangered species that has the potential to nest in the study area. As such, impacts to these species must comply with regulations regarding take of a listed species.

CDFW Species of Special Concern

Raptors—including Cooper's hawk, golden eagle, northern harrier, and peregrine falcon—are known to forage and/or nest in suitable habitats within the study area. Cooper's hawk and golden eagle are MSCP covered as year-round residents in San Diego. The northern harrier and peregrine falcon are MSCP covered migrants and winter residents in San Diego. To be in compliance with the Migratory Bird Treaty Act (MBTA) and Section 3503 of the California Fish and Game Code, no active nests of migratory bird species may be impacted during project construction.

Coastal cactus wren, southern California rufous-crowned sparrow, San Diego horned lizard, southern Pacific pond turtle, and Belding's orange-throated whiptail are CDFW species of special concern and MSCP covered species. Any impacts to their habitat types could potentially impact these species.

Other species within the study area are CDFW species of special concern but are not covered by the MSCP. These include western spadefoot toad, Coronado skink, coast patch-nosed snake, two-striped garter snake, northern red diamond rattlesnake, yellow warbler, California horned lark, yellow-breasted chat, double-crested cormorant, pocketed free-tailed bat, big free-tailed bat, Dulzura California pocket mouse, northwestern San Diego pocket mouse, western mastiff bat, western red bat, and San Diego black-tailed jackrabbit. Any impacts to their habitat types could potentially impact these species.

Other MSCP Covered Species

Other species that are considered sensitive include western bluebird, southern mule deer, and mountain lion. As these species are protected under the MSCP, impacts to these species and their habitats should be avoided.

Overall, subsequent projects implemented in accordance with the MPU-Plans have the potential to significantly impact sensitive wildlife species directly through the loss of habitat resulting from implementation of the MPU (trail construction, park amenities, parking areas, etc.). Impacts to those wildlife species listed in Table 5.5-7 but not discussed above would be adverse, though not significant, due to their lower sensitivity ratings and the fact that suitable habitat would be preserved in the MHPA to compensate for loss of sensitive habitat.

c. Indirect Impacts to Sensitive Wildlife Species

As previously detailed, the NRMP incorporates management actions in order to protect sensitive species and habitats from anthropogenic threats and indirect impacts. The NRMP would therefore not result in indirect impacts to wildlife species.

The MHPA has been designed to maximize conservation of sensitive biological resources, including sensitive species. If subsequent projects contemplated by the MPU_Plans_(such as trails or recreational amenities) are developed within or adjacent to the MHPA, there is a potential for secondary impacts that may degrade the habitat value or disrupt animals within the preserve area. These secondary effects may include habitat isolation, drainage or water quality impacts, noise, exotic plant species, nuisance animal species, and human intrusion. These impacts would be short-term, resulting from construction activities, or long-term, resulting from recreational users. Short-term construction impacts could result in disruption of nesting and breeding and would thus affect the population of sensitive species.

Therefore, subsequent projects identified by the <u>MPU_Plans</u> would have the potential to result in indirect impacts to sensitive species. Indirect impacts would be significant (**Impact BIO-3**).

In summary, potential impacts to the following MSCP covered plant species would be significant (Impact BIO-1)

- Willowy monardella
- San Diego goldenstar
- Orcutt's brodiaea
- Variegated dudleya

- San Diego barrel cactus
- San Diego thornmint
- San Diego ambrosia

Potential impacts to other sensitive plants with a CNPS Rare Plant ranking listed in Table 5.5-6 may also be significant, depending on the type of project and number of individuals impacted. Potential direct and indirect impacts to the following sensitive wildlife species would also be significant (Impacts BIO-2 and BIO-3):

- San Diego fairy shrimp
- Quino checkerspot butterfly
- Belding's orange-throated whiptail
- Southern Pacific pond turtle
- San Diego horned lizard
- Coastal California gnatcatcher
- Coastal cactus wren
- Cooper's hawk (nesting)
- Golden eagle (nesting and wintering)
- Least Bell's vireo
- Light-footed clapper rail
- Northern harrier (nesting)
- Peregrine falcon (nesting)
- Southern California rufous-crowned sparrow
- Southwestern willow flycatcher
- Western bluebird
- Southern mule deer
- Mountain lion

Issue 2: Migratory Wildlife

Would implementation of the Plans and associated discretionary actions result in interference with the nesting/foraging/movement of any resident or migratory fish or wildlife species?

The Park is an identified core biological resource area within the MSCP and regional wildlife corridor. Maintaining connectivity amongst core MSCP areas is a high priority of the <u>sSubarea pPlan</u>. The Park's areas are separated by man-made and topographic boundaries, and as a result have varying levels of urban edge and connectivity. The NRMP specifies management actions in order to increase connectivity within the Park, which would in turn increase regional connectivity.

For example, the <u>eastern-most</u> wildlife tunnel is a wildlife undercrossing approximately 1.8 miles north of the Tierrasanta trailhead. This tunnel crosses under SR-52 and connects the Fortuna Mountain area with lands managed by MCAS Miramar. MCAS Miramar has installed a set of bars at the northern end of the tunnel to restrict recreational encroachment onto their property. Despite the barriers and exclusion signage, WTI observed that vandals have broken the barrier and frequently use the tunnel (day and nighttime) to illegally access trails on MCAS Miramar. Evidence collected during the <u>WTI</u> study suggested that the mule deer will cross SR-52 at grade when fencing in this area is compromised (WTI 2010). Smaller mammals such as coyote (*Canis latrans*) and bobcats (*Lynx rufus*), however, continued to use the crossing. The combination of a partially functional gate and frequent recreational use appear to be limiting the use of the wildlife tunnel as a wildlife crossing by large mammals such as mule deer and mountain lion. Therefore, the NRMP recommends that City staff coordinate with MCAS Miramar to develop a plan to remove bars from the wildlife tunnel and address recreational encroachment onto federal lands.

Other-NRMP management actions would improve connectivity within the Park. Multiple existing trail alignments would be rerouted to avoid sensitive habitat, and exclusionary fencing would be installed. A wildlife assessment of the Oak Canyon area determined that a mule deer and other species move across hillsides along transition zones where the combination of vegetation and topographic features (habitat types) change (WTI 2010). These transition zones serve as busy wildlife movement areas due to the quick escape potential on one side and access to feeding areas on the other. Consequently,

Following Public Review of the Draft PEIR, through meetings with the Wildlife Agencies, the City reviewed the NRMP and proposed revised reroutes—trail alignments have been rerouted in order—to further avoid and reduce impacts to these—sensitive wildlife corridors (Wildlife Tracking Company 2016, 2018a, 2018b). Specifically, the trail alignment originally proposed in Oak Canyon is relocated outside of the canyon bottom and repositioned adjacent to the ridgeline utility road. While the revised trail would still allow for a combination of existing (0.62-miles) and proposed (1.60 miles) trails to create a 2.22-mile Hike/Bike trail, the effects on wildlife movement would be reduced compared to the existing condition, as well as the analysis contained within the Draft PEIR.

Additionally, a portion of the trail segment from Spring Canyon, between the existing Sycamore Landfill and SR-52, is relocated to both reduce bisecting of this area near the landfill access road and avoid mitigation sites previously approved for expansion of the Sycamore Landfill, creating a more direct connection, parallel, but outside of the SR-52 right of way. This would reduce not only the

bisecting of the wildlife corridor, but also the length of the proposed trail by over 0.5 mile, to 1.50 miles.

These Plan modifications serve to further reduce potential direct and indirect impacts to migratory wildlife consistent with the MSCP Subarea Plan and NRMP. Additionally, Some areas of the Park, such as riparian habitat along the San Diego River, may require temporary or seasonal closure of recreational uses due to conflicts with resource management objectives. These are merely some examples of the numerous recommendations and actions identified within the NRMP that aim to improve wildlife movement corridors and regional connectivity within the Park. Therefore, potential NRMP impacts associated with wildlife movement corridors would be less than significant.

Even with the implementation of the aforementioned actions, impacts to wildlife nesting, foraging, and movement have potential to occur during subsequent projects implemented in accordance with the MPUPlans, as described below. The program-level analysis identifies areas of potential impacts. Site-specific analysis would be conducted for subsequent projects implemented in accordance with the MPUPlans to determine the extent of impacts to wildlife nesting, foraging, and movement.

For example, MPU Recommendation LM-H2 for the Lake Murray area states to "Remove dead or diseased eucalyptus trees and eucalyptus trees with calipers less than 4-inches at 4-feet above ground and replace with native tree species per MSCP directive." Although this would have the potential to increase habitat availability for sensitive plants and wildlife, the removal of non-native vegetation (eucalyptus trees) could result in loss of raptor nesting habitat.

Other subsequent projects under the MPUPlans, such as trails and recreational amenities, may require grading, removal of vegetated habitat, or conversion of open areas to developed uses. In the Cowles Mountain area, for example, a new trail connection from Pyles Peak to Big Rock is envisioned in order to create a large loop on the east side of Pyles Peak and north side of Cowles Mountain. A subsequent project of this nature has the potential to interfere with wildlife nesting, foraging, or movement. Therefore, impacts would be significant (Impact BIO-4).

Issue 3: Sensitive Habitat

Would implementation of the Plans and associated discretionary actions result in an impact to a sensitive habitat, including, but not limited to streamside vegetation, oak woodland, vernal pools, wetlands, coastal sage scrub, or chaparral?

As previously detailed, in order to more efficiently manage natural resources within the Park, the NRMP grouped sensitive habitats into geographic areas based on threat type similarities. Each of those management guilds would be used to coordinate threat treatment across several sensitive species and vegetation types.

For example, the Tierrasanta Clay Ridge management guild is within the eastern portion of the Fortuna Mountain area. It contains a broad, dissected clay ridgeline which is vegetated with a matrix of coastal sage scrub, chaparral, and non-native grassland vegetation and hosts numerous sensitive species (Figure 5.5-7). By identifying these species and the threats to the guild as a whole, the NRMP then specified a goal to "maintain habitat quality, spacial extent, and species richness of native species within guild boundary." The objectives to accomplish this goal are:

- Objective 1: Survey Biological Crusts
- Objective 2: Trail Closure/Reroute
- Objective 3: Implement VPHCP Recommendations

As shown on Figure 5.5-8, the NRMP sets forth management actions for threatened management guilds, which in turn aim to improve sensitive habitats within the Park. The MPU also took into account these actions in the development of conceptual trail reroutes and closures, as one example.

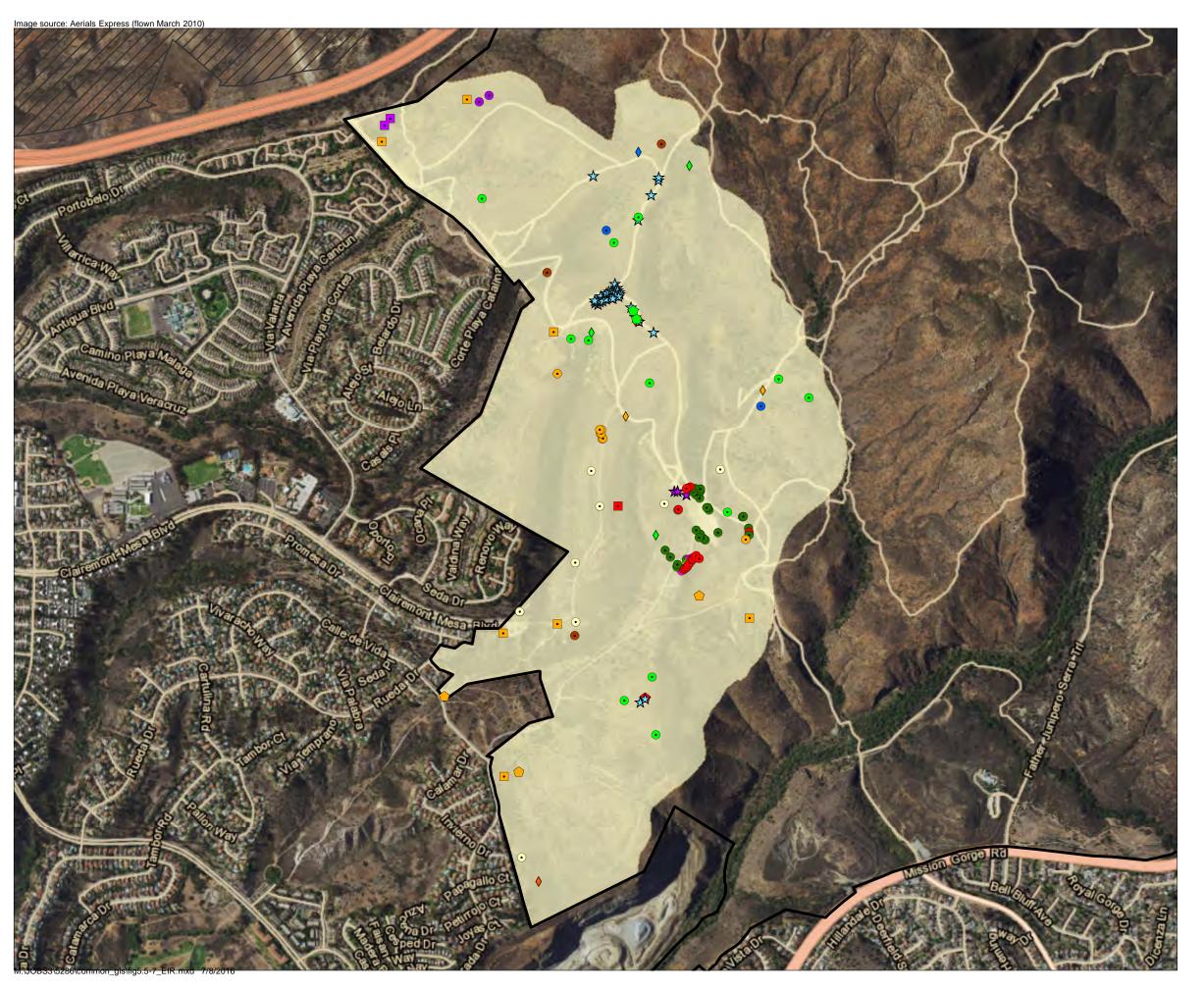
As previously detailed, the MPU—Plans also identifyies subsequent projects—such as trails, recreational amenities, and facilities—that would have the potential to result in temporary and permanent impacts to sensitive vegetation communities as identified by the MSCP. These habitats include native grassland, valley needlegrass grassland, wildflower field, Diegan coastal sage scrub, chamise chaparral, southern mixed chaparral, scrub oak chaparral, and non-native grassland. The location of existing and proposed trails in relation to the vegetation communities within the Park is shown on Figures 5.5-2a through 5.5-2e. Impacts would be significant (Impact BIO-5).

Issue 4: Invasive Plants

Would implementation of the Plans and associated discretionary actions result in the introduction of invasive species of plants into the area?

The NRMP includes management actions in order to control invasive species that currently pose a threat to ecological guilds within the Park. Invasive species are aggressive non-native plant species that threaten natural habitats by outcompeting native species and reducing biodiversity. For example, exotic perennial weed species pose a major threat to the *Artemisia*-dominated coastal sage scrub guild at the Park. A large population (5 acres of coverage) of artichoke thistle (*Cynara cardunculus*) was observed in the West Sycamore area during vegetation surveys. Artichoke thistle, also called cardoon, is a perennial herb that may grow up to 6 feet high and 6 feet wide with a cluster of large, purple flower heads. The NRMP identifies objectives to remove this invasive species, including the development of a restoration plan, which would specify herbicide treatments, a schedule, and success criteria. The NRMP would not result in the introduction of invasive species; impacts would be less than significant.

Subsequent projects, such as trails and recreational amenities, implemented in accordance with the MPU-Plans would adhere to MSCP Subarea Plan and City regulations, both of which contain policies for control of invasive plant species. These plants thrive in areas disturbed by activities such as grading, construction, trail usage, and fire. Therefore, subsequent projects implemented in accordance with the MPU-Plans would have the potential to introduce non-native plant species. These impacts would be significant (Impact BIO-6).





Project Boundary

MCAS Miramar

Tierrasanta Clay Guild

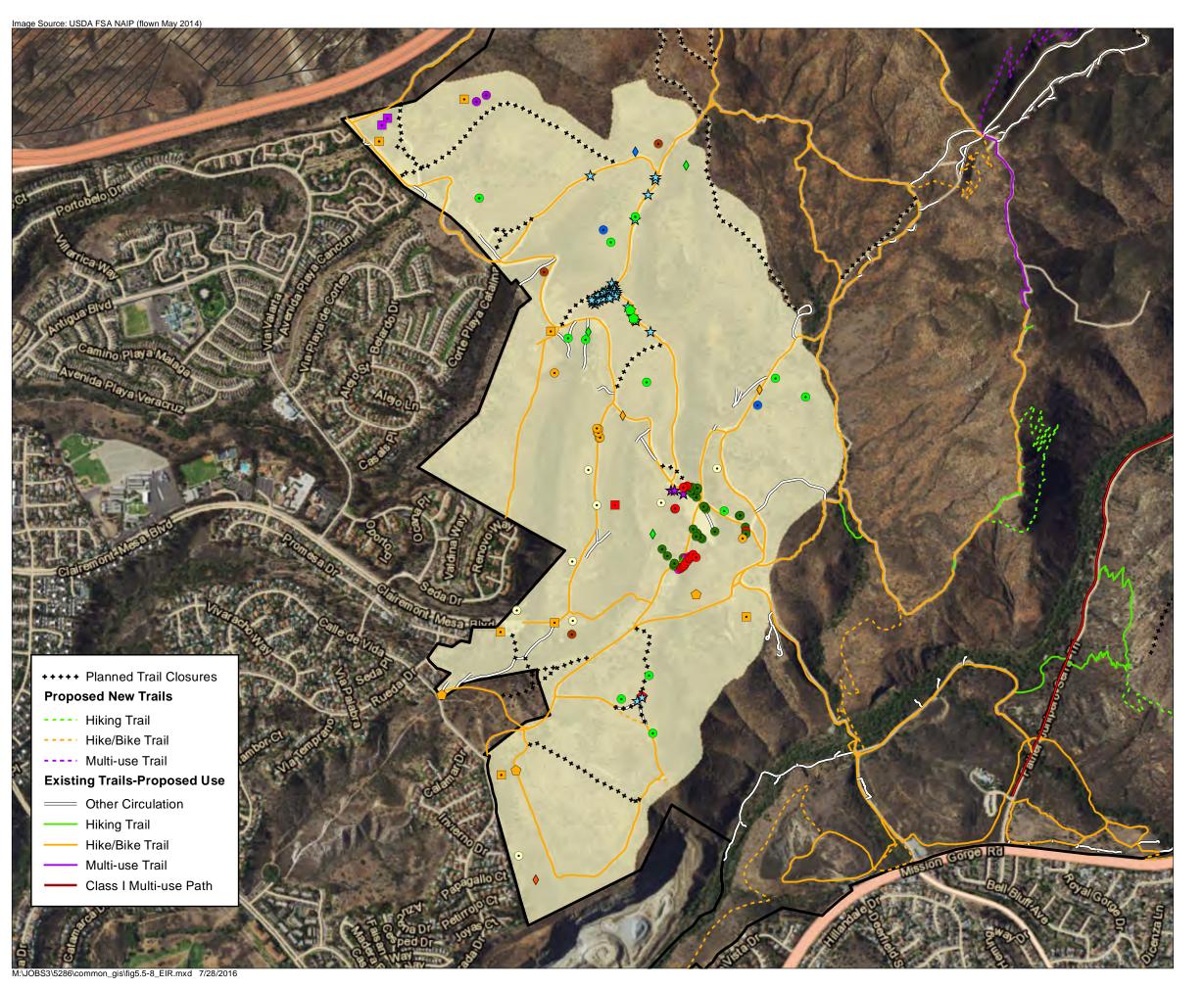
Sensitive Species

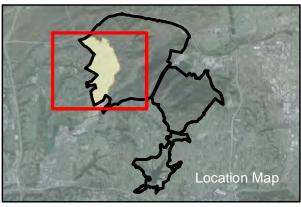
- Ashy Spike-moss
- Decumbent Goldenbush
- Palmer's Grappling Hook
- San Diego Barrel Cactus
- San Diego County Viguiera
- San Diego Goldenstar
- San Diego Thornmint
- Summer Holly
- Western Dichondra
- Woven-spored Lichen
- Variegated Dudleya
- San Diego Desert Woodrat
- Mule Deer
- Black-tailed Jackrabbit
- San Diego Pocket Mouse
- Coastal California Gnatcatcher
- Least Bell's Vireo
- Southern California Rufus-crowned Sparrow
- Western Spadefoot Toad
- Belding's Orange-throated Whiptail
- San Diego Fairy Shrimp
- ★ Vernal Pool
- ★ Quino Checkerspot Butterfly



recente Clay Cuild

Tierrasanta Clay Guild within Study Area





Project Boundary

MCAS Miramar

Tierrasanta Clay Guild

Sensitive Species

- Ashy Spike-moss
- Decumbent Goldenbush
- Palmer's Grappling Hook
- San Diego Barrel Cactus
- San Diego County Viguiera
- San Diego Goldenstar
- San Diego Thornmint
- Summer Holly
- Western Dichondra
- Woven-spored Lichen
- Variegated Dudleya
- ♦ San Diego Desert Woodrat
- Mule Deer
- ♦ Black-tailed Jackrabbit
- ♦ San Diego Pocket Mouse
- Coastal California Gnatcatcher
- Least Bell's Vireo
- Southern California Rufus-crowned Sparrow
- Western Spadefoot Toad
- Belding's Orange-throated Whiptail
- San Diego Fairy Shrimp
- ★ Vernal Pool
- Quino Checkerspot Butterfly



Management Actions for Tierrasanta Clay Guild

Issue 5: Wetlands

Would implementation of the Plans and associated discretionary actions result in an impact on City, state, or federally regulated wetlands (including, but not limited to, salt marsh, vernal pool, lagoon, riparian habitat, etc.) through direct removal, filling, hydrological interruption, or other means?

As previously detailed, the NRMP identifies management actions for ecological guilds. These guilds contain sensitive riparian habitat, including vernal pools and wetlands. For example, the riparian woodlands ecological guild is primarily located within the floodplain of the San Diego River within the Mission Gorge area. The NRMP details management actions to minimize threats, such as continued trapping of brown-headed cowbirds and removal of giant reed. The NRMP would not result in an impact on wetlands or riparian habitats. If restoration or transplantation activities occur near such habitats, minimization measures in the NRMP would be required to be adhered to prior to the beginning of such activities. Impacts would be less than significant.

Riparian habitats in the study area consist of southern willow scrub, southern riparian scrub, open water, coastal and freshwater marsh, mule fat scrub, and San Diego mesa vernal pool. The City's Biology Guidelines, ESL Regulations, and MSCP Subarea Plan requires that impacts to wetlands, which include vernal pools and vernal pool species, shall be avoided and that a sufficient buffer shall be maintained around all wetlands to protect wetland functions and values.

In the case of vernal pools, avoidance includes maintaining a sufficient amount of the pool's watershed area necessary for its continued viability and providing a buffer around the vernal pool to protect wetland functions and values. Buffer distances are typically 100 feet, but in some cases, a lesser buffer may be approved provided it can be demonstrated that the functions and values of the wetland are not compromised.

Subsequent projects implemented in accordance with the MPUPlans, such as trails, may result in impacts to wetlands and thus require a deviation from the ESL Regulations. Wetland impacts may be considered under the following three options: the Essential Public Projects, Economic Viability Option, or Biologically Superior Option. Under the wetland deviation process for the Essential Public Projects and Economic Viability Options, impacts must be avoided, but if not feasible, then impacts must be minimized to the maximum extent practicable. Under the wetland deviation process for the Biologically Superior Option, only wetland resources of low biological quality may be impacted and must result in a biologically superior outcome.

The assessment of low biological quality would be specific to the resource type impacted (e.g., vernal pools, riparian, and unvegetated channels), and would include consideration of the following factors: use of the wetland by federal and/or state endangered, threatened, sensitive, rare and/or other indigenous species, diversity of native flora and fauna enhancement or restoration potential, habitat function/ecological role, connectivity to other wetland or upland systems, hydrologic functions, status of watershed, and source and quality of water. In addition, impacts to vernal pools would require special assessments, as noted below.

a. Vernal Pools and Vernal Pool Species

Vernal pools and basins with fairy shrimp occur within the study area. As mentioned previously, basins with fairy shrimp may be vernal pools or road ruts in which fairy shrimp occur. Project-specific analysis would be required for future projects and would determine what agencies (City, USFWS, RWQCB, USACE, or CDFW) have regulatory authority over basins with fairy shrimp.

Impacts to vernal pools would require a deviation from the City's ESL Regulations. The vernal pools which could be impacted would require the following assessments: presence of vernal pool flora and fauna, information on hydrology, determination of habitat function, and restoration potential. In addition, protocol fairy shrimp surveys would be required for all vernal pools to determine the presence or absence of these species. Impacts tolncidental take of fairy shrimp would require a Section 10(a)1(A) permit from the USFWS be covered under the City's adopted VPHCP pursuant to the findings and recommendations made by the USFWS for issuance of Section 10(a)(1)(B) Permit number TE-97791C.

Although impacts to vernal pools and vernal pool species are not anticipated to occur, subsequent restoration efforts implemented in accordance with the MPU-Plans have the potential to impact covered species addressed in the Draft-VPHCP. Impacts would be significant (Impact BIO-7).

b. Other Jurisdictional Wetlands

Implementation of the MPU-Plans has the potential to result in impacts to both wetland and non-wetland streambed waters regulated by the USACE, CDFW, RWQCB, and City of San Diego. In addition, the USFWS would be involved under Section 7 of the FESA during consultation initiated by the USACE during the 404 permit process if federal listed species are present. There is also the potential for additional unmapped non-wetland waters of the U.S. and streambeds to occur within the study area.

Future projects implemented in accordance with the MPU-Plans have the potential to result in disturbances to habitat and drainages that are under the jurisdiction of the USACE according to Section 404 of the Clean Water Act (CWA), RWQCB in accordance with Section 401 of the CWA, and CDFW under Section 1600 of the Fish and Game Code. In addition, impacts to wetlands would require a deviation from the City's ESL Regulations. Wetland and jurisdictional impacts would be determined at the project level and would require subsequent environmental review.

In addition, a preliminary or final jurisdictional wetlands delineation of the future project site shall be completed following the methods outlined in the USACE's 1987 Wetlands Delineation Manual and the Regional Supplement to the Corps of Engineers Delineation Manual for the 2008 Arid West Region. A determination of the presence/absence and boundaries of any waters of the U.S. and waters of the state shall also be completed following the appropriate USACE guidance documents for determining the Ordinary High Water Mark (OHWM) boundaries. The limits of any riparian habitats on the site under the sole jurisdiction of CDFW shall also be delineated, as well as any special aquatic sites (e.g., vernal pools) that may not be within the USACE jurisdiction under the CWA or meet other federal jurisdictional criteria but are regulated by the FESA, CESA, and/or RWQCB. The

City does not have has take authority for vernal pools containing sensitive species through the VPHCP. A USFWS permit would be required if vernal pools were present with sensitive species.

Although the Plans include policies intended to avoid impacts to wetlands and in some cases to restore existing disturbed wetland habitats, it is possible that implementation of the Plans and associated discretionary actions could result in limited impacts to jurisdictional wetlands during activities such as wetland restoration and installation of trail/river crossing improvements. Potential impacts to jurisdictional wetlands would be significant (Impact BIO-8) and mitigation is required.

5.5.5 Significance of Impacts

Issue 1: Sensitive Plant and Wildlife Species

Subsequent projects implemented in accordance with the MPU Plans would have the potential to impact sensitive plants and wildlife species directly through the loss of habitat or indirectly by placing trails and recreational facilities adjacent to the MHPA. Potential impacts to the following MSCP covered plant species would be significant (Impact BIO-1):

- Willowy monardella
- San Diego goldenstar
- Orcutt's brodiaea
- Variegated dudleya
- San Diego barrel cactus
- San Diego thornmint
- San Diego ambrosia

Potential direct and indirect impacts to the following sensitive wildlife species would also be significant (Impacts BIO-2 and BIO-3):

- San Diego fairy shrimp
- Quino checkerspot butterfly
- Belding's orange-throated whiptail
- Southern Pacific pond turtle
- San Diego horned lizard
- Coastal California gnatcatcher
- Coastal cactus wren
- Cooper's hawk (nesting)
- Golden eagle (nesting and wintering)
- Least Bell's vireo
- Light-footed clapper rail
- Northern harrier (nesting)
- Peregrine falcon (nesting)
- Southern California rufous-crowned sparrow
- Southwestern willow flycatcher
- Western bluebird
- Southern mule deer
- Mountain lion

Issue 2: Migratory Wildlife

The NRMP includes numerous management actions specifically designed to improve wildlife movement corridors both within the Park and regionally. However, the MPU also envisions subsequent facility, recreation, and trail projects. These subsequent projects have the potential to result in habitat modifications, which in turn may interfere with wildlife nesting, foraging, or movement within riparian habitats and upland habitats. Impacts would be significant (Impact BIO-4).

Issue 3: Sensitive Habitat

The NRMP identifies numerous management actions for ecological guilds within the Park, including cliffs and rocky outcrops, East Elliott clay ridgelines, Tierrasanta clay ridges, riparian woodlands, and *Artemisia*-dominated coastal sage scrub. These actions aim to improve the viability of these habitats. However, subsequent projects implemented in accordance with the MPU would have the potential to impact Tier I, II, IIIA, and IIIB habitats, pursuant to the MSCP. These impacts would be significant (**Impact BIO-5**)

Issue 4: Invasive Plants

Invasive plants thrive in areas disturbed by activities such as grading, construction, trail usage, and fire. Therefore, as subsequent projects implemented in accordance with the MPU_Plans_would involve trail construction, realignments, and closures, there would be the potential to introduce non-native plant species within sensitive habitats. These impacts would be significant (Impact BIO-6).

Issue 5: Wetlands

Subsequent projects implemented in accordance with the Plans would have the potential to impact vernal pools and their species, as well as jurisdictional wetlands. Impacts would be significant (Impacts BIO-7 and BIO-8).

5.5.6 Mitigation Framework

All impacts to sensitive biological resources shall be avoided to the maximum extent feasible and minimized when avoidance is not possible. Where impacts are not avoidable or cannot be minimized, mitigation shall be required to reduce significant impacts to below a level of significance. Mitigation measures typically employed include resource avoidance, minimization, restoration, or creation of habitat, dedication, or acquisition of habitat, or payment into the City of San Diego's Habitat Acquisition Fund or other City-approved mitigation bank. Mitigation measures shall be determined and implemented at the project level. Adherence to the recommendations below, where applicable to a particular future action, would minimize impacts to sensitive biological resources.

Potential impacts resulting from introduction of invasive species into the MHPA (Impact BIO-6) would be reduced to less than significant through implementation of MM-LU-1 as detailed in Section 5.1, Land Use, of this Program Environmental Impact Report (PEIR). As detailed therein, all

subsequent projects would be subject to California Environmental Quality Act (CEQA) review and compliance with the Plans, the City's Biology Guidelines, MSCP Subarea Plan, and the Landscape Standards in the Land Development Manual, including the prohibitions on the use of invasive plant species, such as paper mulberry (*Broussonetia papyrifera*) or pampas grass (*Cortaderia selloana*). The MHPA Land Use Adjacency Guidelines also require that no invasive, non-native plant species be introduced into areas adjacent to the MHPA, which covers most of the Park.

Implementation of mitigation measure MM-BIO-1 would reduce impacts to sensitive plants and wildlife species identified under Issue 1 (Impacts BIO-1 through BIO-3) and would reduce impacts to sensitive habitat (Impact BIO-5) to less than significant.

MM-BIO-1:

To reduce potentially significant impacts that would cause a reduction in the number of unique, rare, endangered, sensitive, or fully protected species of plants or animals, if present within the study area, subsequent MPU projects that are proposed in undisturbed areasany location in the Plan areas with the potential to support sensitive biological resources, whether the area is disturbed or not disturbed, shall be analyzed in accordance with the CEQA Significance Thresholds, which require that site-specific biological resources surveys be conducted in accordance with City of San Diego Biology Guidelines (2012, 2018b). The locations of any sensitive plant species, including listed, rare, and narrow endemic species, as well as the potential for occurrence of any listed or rare wildlife species shall be recorded and presented in a biological resources report. Based on available habitat within the study area, focused presence/absence surveys shall be conducted in accordance with the Biology Guidelines and applicable resource agency survey protocols to determine the potential for impacts resulting from the future projects on these species. Engineering design specifications based on project-level grading and site plans shall be incorporated into the design of future projects to minimize or eliminate direct impacts on sensitive plant and wildlife species consistent with the NRMP, FESA, MBTA, Bald and Golden Eagle Protection Act, California Endangered Species Act (CESA), MSCP Subarea Plan, and ESL Regulations.

Mitigation for Impacts to Sensitive Upland Habitats

Subsequent projects implemented in accordance with the MPU-Plans resulting in impacts to sensitive upland Tier I, II, IIIA, or IIIB habitats shall implement avoidance and minimization measures consistent with the City Biology Guidelines and MSCP Subarea Plan and provide suitable mitigation in accordance with the City's Biology Guidelines and MSCP Subarea Plan (Table 5.5-8). Future project-level grading and site plans shall incorporate project design features to minimize direct impacts on sensitive vegetation communities shown in Table 5.5-6, consistent with federal, state, and City guidelines. Any required mitigation for impacts on sensitive vegetation communities shall be outlined in a conceptual mitigation plan following the outline provided in the City's Biology Guidelines.

Mitigation for impacts to sensitive vegetation communities shall be implemented at the time future development projects are proposed. Project-level analysis shall determine whether the impacts are within or outside of the MHPA. Any MHPA boundary adjustments shall be processed by the individual project applicants through the City and Wildlife Agencies during the early project planning stage.

Mitigation for impacts to sensitive upland habitats shall occur in accordance with the MSCP mitigation ratios as specified within the City's Biology Guidelines (City of San Diego 2012, 2018b). These mitigation ratios are based on tier level of the vegetation community, the location of the impact, and the location of the mitigation site(s). For example, impacts to lands inside of the MHPA and mitigated outside the MHPA would have the highest mitigation ratio whereas impacts to lands outside the MHPA and mitigated inside the MHPA would have the lowest mitigation ratio.

Table 5.5-8 Mitigation Ratios for Impacts to Upland Vegetation Communities and Land Cover Types						
Tier	Habitat Type		Mitigatio	n Ratios		
TIER I	Southern Foredunes		Lo	cation of l	Preservation	
(rare uplands)	Torrey Pines Forest Coastal Bluff Scrub Maritime Succulent Scrub Maritime Chaparral Scrub Oak Chaparral Native Grassland Oak Woodlands	Location of Impact	Inside Outside	<u>Inside</u> 2:1 1:1	Outside 3:1 2:1	
TIER II	Coastal Sage Scrub (CSS)	Location of Preservation				
(uncommon	CSS/Chaparral			<u>Inside</u>	<u>Outside</u>	
uplands)		Location	Inside*	1:1	2:1	
		of Impact	Outside	1:1	1.5:1	
TIER IIIA	Chamise Chaparral		Location of Preservation			
(common	Mixed Chaparral			<u>Inside</u>	<u>Outside</u>	
uplands)		Location	Inside*	1:1	1.5:1	
		of Impact	Outside	0.5:1	1:1	
TIER IIIB	Non-native Grassland		Location of Preservation			
(common				<u>Inside</u>	<u>Outside</u>	
uplands)		Location	Inside*	1:1	1.5:1	
		of Impact	Outside	0.5:1	1:1	
Tier IV	Disturbed Land		Location of Preservation			
(other uplands)	Agriculture			<u>Inside</u>	<u>Outside</u>	
	Eucalyptus Woodland	Location	Inside*	0:1	0:1	
	Ornamental Plantings	of Impact	Outside	0:1	0:1	

NOTES:

For all Tier I impacts, the mitigation could (1) occur within the MHPA portion of Tier I or (2) occur outside of the MHPA within the affected habitat type (in-kind).

For impacts on Tier II, IIIA, and IIIB habitats, the mitigation could (1) occur within the MHPA portion of Tiers I – III (out-of-kind) or (2) occur outside of the MHPA within the affected habitat type (in-kind). Project-specific mitigation will be subject to applicable mitigation ratios at the time of project submittal.

Mitigation for Short-term Impacts to Sensitive Species from Project Construction (Impact BIO-4) would be addressed through implementation of MM-LU-1 and MM-BIO-2.

MM-BIO-2:

Mitigation for future projects to reduce potentially significant impacts that would interfere with the nesting, foraging, or movement of wildlife species within the study area, shall be identified in site-specific biological resources surveys prepared in accordance with City of San Diego Biology Guidelines as further detailed in MM-BIO-1 during the discretionary review process. The biology report shall include results of protocol surveys and recommendations for additional measures to be implemented during construction-related activities; shall identify the limits of any identified local-scale wildlife corridors or habitat linkages and analyze potential impacts in relation to local fauna, and the effects of conversion of vegetation communities to minimize direct impacts on sensitive wildlife species and to provide for continued wildlife movement through the corridor.

Measures that shall be incorporated into project-level construction documents to minimize direct impacts on wildlife movement, nesting, or foraging activities shall be addressed in the biology report and shall include recommendations for preconstruction protocol surveys to be conducted during established breeding seasons, construction noise monitoring and implementation of any species-specific mitigation plans (such as a burrowing owl mitigation plan) in order to comply with the FESA, MBTA, Bald and Golden Eagle Protection Act, State Fish and Game Code, and/or the ESL Regulations.

Potentially significant impacts to wetlands/jurisdictional resources (Impacts BIO-7 and BIO-8) associated with future implementation of the Plans and associated discretionary actions shall be required to implement the Mitigation Framework (MM-BIO-3), as follows:

MM-BIO-3:

To reduce potential direct impacts to City, state, and federally regulated wetlands, all subsequent projects developed in accordance with the MPU and NRMPPlans shall be required to comply with CWA Section 404 requirements and special conditions, RWQCB in accordance with Section 401 of the CWA, CDFW Section 1602 Streambed Alteration Agreement requirements and special conditions, and the City of San Diego ESL Regulations for minimizing impacts to wetlands. Achieving consistency with these regulations for impacts on wetlands and special aquatic sites would reduce potential impacts to regulated wetlands and provide compensatory mitigation (as required) to ensure no net loss of wetland habitats.

Prior to obtaining discretionary permits for future actions implemented in accordance with the MPU and NRMPPlans, a site-specific biological resources survey shall be completed in accordance with City of San Diego Biology Guidelines. Any required mitigation for impacts shall be outlined in a conceptual wetland mitigation plan prepared in accordance with the City's Biology Guidelines (2012, 2018b). In addition, a preliminary or final jurisdictional wetlands delineation of the project site shall be completed following the methods outlined in the USACE's 1987 Wetlands Delineation Manual and the 2008 Regional Supplement to the Corps of Engineers Delineation Manual for the Arid West Region. A determination of the presence/absence and boundaries of any waters of the U.S. and waters of the state shall also be

completed following the appropriate USACE guidance documents for determining the OHWM boundaries. The limits of any riparian habitats on-site under the sole jurisdiction of CDFW shall also be delineated, as well as any special aquatic sites (excluding vernal pools) that may not meet federal jurisdictional criteria but are regulated by the RWQCB. Engineering design specifications based on project-level grading and site plans shall be incorporated into the project design to minimize direct impacts to wetlands, jurisdictional waters, riparian habitats, vernal pools, etc. consistent with federal, state, and City guidelines.

Additionally, any impacts to wetlands in the City of San Diego would require a deviation from the ESL wetland regulations. Under the wetland deviation process, development proposals that have wetland impacts shall be considered only pursuant to one of three options: Essential Public Projects, Economic Viability Option, or Biologically Superior Option. ESL Regulations require that impacts to wetlands be avoided. Unavoidable impacts to wetlands shall be minimized to the maximum extent practicable and mitigated as follows:

- As part of the project-specific environmental review pursuant to CEQA, all
 unavoidable wetland impacts shall be analyzed, and mitigation shall be required
 in accordance with ratios shown in the table below. Mitigation shall be based on
 the type of wetland impacted and the project design. Mitigation shall prevent any
 net loss of wetland functions and values of the impacted wetland.
- For the Biologically Superior Option, the project and proposed mitigation shall include avoidance, minimization, and compensatory measures, which would result in a biologically superior net gain in overall function and values of (a) the type of wetland resource being impacted and/or (b) the biological resources to be conserved; and the biologically superior mitigation shall include either: (1) standard mitigation per Table 5.5-9a, including wetland creation or restoration of the same type of wetland resource that is being impacted that results in high quality wetlands; and a biologically superior project design whose avoided area(s) are (i) in a configuration or alignment that optimizes the potential long-term biological viability of the on-site sensitive biological resources, and/or (ii) conserves the rarest and highest quality on-site biological resources; or (2) for a project not considered consistent with "1" above, extraordinary mitigation per Table 5.5-9b is required.

Table 5.5-9a City of San Diego Wetland Mitigation Ratios (with biologically superior design)				
Vegetation Community	Mitigation Ratio			
Riparian	2:1 to 3:1			
Vernal pool*	2:1 to 4:1			
Basin with fairy shrimp*	2:1 to 4:1			
Freshwater marsh	2:1			

*The City does not currently have <u>has</u> take authority for vernal pools <u>species occurring within the vernal pool HCP areas</u>. A draft vernal pool HCP has been prepared by the City in coordination with the Wildlife Agencies. If adopted, the City would have "take" authority for the vernal pool species occurring within the vernal pool HCP areas.

Table 5.5-9b City of San Diego Wetland Mitigation Ratios (Without Biologically Superior Design)				
Mitigation Ratio				
4:1 to 6:1				
4:1 to 8:1				
4:1 to 8:1				
4:1				

*The City does not currently have <u>has</u> take authority for vernal pools <u>species occurring within the vernal pool HCP areas</u>. A draft vernal pool HCP has been prepared by the City in coordination with the Wildlife Agencies. If adopted, the City would have "take" authority for the vernal pool species occurring within the vernal pool HCP areas.

As part of any future project-specific environmental review pursuant to CEQA, all unavoidable wetlands impacts (both temporary and permanent) shall be analyzed and mitigation required in accordance with the City's Biology Guidelines; mitigation shall be based on the impacted type of wetland habitat. Mitigation shall prevent any net loss of wetland functions and values of the impacted wetland. The following provides operational definitions of the four types of activities that constitute wetland mitigation under the ESL Regulations:

- **Wetland creation** is an activity that results in the formation of new wetlands in an upland area. An example is excavation of uplands adjacent to existing wetlands and the establishment of native wetland vegetation.
- **Wetland restoration** is an activity that re-establishes the habitat functions of a former wetland. An example is the excavation of agricultural fill from historic wetlands and the re-establishment of native wetland vegetation.
- **Wetland enhancement** is an activity that improves the self-sustaining habitat functions of an existing wetland. An example is removal of exotic species from existing riparian habitat.
- **Wetland acquisition** may be considered in combination with any of the three mitigation activities above.

Wetland enhancement and wetland acquisition focus on the preservation or the improvement of existing wetland habitat and function and do not result in an increase in wetland area; therefore, a net loss of wetland may result. As such, acquisition and/or enhancement of existing wetlands shall be considered as partial mitigation only for any balance of the remaining mitigation requirement after restoration or creation if wetland acreage is provided at a minimum of a 1:1 ratio.

For permanent wetland impacts that are unavoidable and minimized to the maximum extent feasible, mitigation shall consist of creation of new in-kind habitat to the fullest extent possible and at the appropriate ratios. If on-site mitigation is not feasible, then at least a portion of the mitigation must occur within the same watershed. The City's Biology Guidelines and MSCP Subarea Plan require that impacts on wetlands, including vernal pools, shall be avoided, and that a sufficient wetland buffer shall be maintained, as appropriate, to protect resource functions/values. The project specific biology report shall include an analysis of onsite wetlands (including City, state, and federal jurisdiction analysis) and, if present, include project alternatives that fully/substantially avoid wetland impacts. Detailed evidence supporting why there is no feasible less environmentally damaging location or alternative to avoid any impacts must be provided for City staff review, as well as a mitigation plan that specifically identifies how the project is to compensate for any unavoidable impacts. A conceptual wetland mitigation plan (which includes identification of the mitigation site) shall be approved by City staff prior to the release of the draft environmental document. Avoidance shall be the first requirement; mitigation shall only be used for impacts clearly demonstrated to be unavoidable.

Prior to the commencement of any construction-related activities on-site for projects impacting wetland habitat (including earthwork and fencing) the applicant shall provide evidence of the following to the Mayor-Appointed Environmental Designee prior to any construction activity:

- Compliance with USACE Section 404 nationwide permit;
- Compliance with the RWQCB Section 401 Water Quality Certification; and
- Compliance with the CDFW Section 1601/1603 Streambed Alteration Agreement.

Vernal Pools and Vernal Pool Species: Impacts to vernal pools shall require assessments of vernal pool flora and fauna, hydrology, habitat function, and restoration potential and protocol fairy shrimp surveys, in addition to the requirements listed above. Impacts to fairy shrimp shall require either a Section 10(a)1(A) permit or Section 7 consultation Biological Opinion from USFWS. If the VPHCP is adopted, the City will receive take authorization for the seven vernal pool species. On January 22, 2018, the San Diego City Council adopted the VPHCP which provides a framework to protect, enhance, and restore vernal pool resources within the City's jurisdiction. The VPMMP was also adopted in conjunction with the VPHCP. In June 2018, the USFWS issued a Biological Opinion in accordance with Section 7 of the FESA regarding issuance of an ITP for implementation of the City's

VPHCP pursuant to Section 10(a)(1)(B) of the act. Subsequently on August 3, 2018, the USFWS made findings and recommendations for issuance of Section 10(a)(1)(B) Permit number TE-97791C to the City in accordance with the VPHCP which will cover incidental take for two federally endangered animal species (San Diego fairy shrimp and Riverside fairy shrimp) along with five listed plant species.

Mitigation for projects impacting vernal pools shall include salvage of sensitive species from vernal pools to be impacted, introduction of salvaged material into restored vernal pool habitat where appropriate (e.g., same pool series), and maintenance of salvaged material pending successful restoration of the vernal pools. Salvaged material shall not be introduced to existing vernal pools containing the same species outside the vernal pool series absent consultation with and endorsement by vernal pool species experts not associated with the project (e.g., independent expert). The mitigation sites shall include preservation of the entire watershed and a buffer based on functions and values; however, if such an analysis is not conducted, there shall be a default of a 100-foot buffer from the watershed.

5.5.7 Significance after Mitigation

Issue 1: Sensitive Plant and Wildlife Species

Implementation of the Plans and associated discretionary actions has the potential to result in significant direct and indirect impacts to sensitive plant and animal species (Impacts BIO-1 through BIO-3); however, implementation of MM-BIO-1 would require site-specific environmental review and analysis of potential impacts to biological resources. Implementation of MM-BIO-1 would reduce significant project-level impacts to sensitive plant and wildlife species to below a level of significance.

Issue 2: Migratory Wildlife

<u>In addition to Compliance</u> with established standards and regulations including ESL Regulations, MSCP, the City's Biology Guidelines, and the Mitigation Framework (MM-BIO-2 and MM-LU-1), <u>further refinements to the proposed plan as a result of comments received during Public Review of the Draft PEIR to realign and reduce the length of trail segments, would serve to reduce impacts related to migratory wildlife (Impact BIO-4) to below a level of significance.</u>

Issue 3: Sensitive Habitat

Compliance with established development standards and regulations, along with implementation of the Mitigation Framework detailed in MM-BIO-1 would serve to reduce impacts to sensitive vegetation communities (Impact BIO-5) to below a level of significance.

Issue 4: Invasive Plants

At the program level, compliance with the MHPA Land Use Adjacency Guidelines and the Mitigation Framework described in MM-LU-1 would reduce impacts related to invasive plants in the MHPA (Impact BIO-6) to less than significant.

Issue 5: Wetlands

Compliance with established development standards, ESL Regulations as well as the MSCP Subarea Plan, the City's Biology Guidelines, and implementation of the Mitigation Framework detailed in MM-BIO-3 would serve to reduce impacts to wetlands, vernal pools, and other jurisdictional water resources (Impacts BIO-7 and BIO-8) at the program level to below a level of significance.

5.6 Historical Resources

This section analyzes potential impacts associated with historical resources (including subsurface archaeological resources and aboveground structures), tribal cultural resources, religious or sacred uses, and human remains that could occur if the Master Plan Update (MPU) and Natural Resources Management Plan (NRMP) (collectively, the Plans for the Mission Trails Regional Park Park are adopted and implemented. It is based on the historical resources technical report (Appendix C) prepared for the Project.

5.6.1 Regulatory Framework

This section provides summary background information regarding applicable land use regulations at the federal, state, and local levels.

5.6.1.1 Federal

The Plans do not have a federal nexus (i.e., federal funding or federal agency involvement) because no actual land disturbances would occur until projects are put forth. At that time, involvement with agencies like the U.S. Fish and Wildlife Service, the United States Environmental Protection Agency (U.S. EPA), and U.S. Army Corps of Engineers would likely necessitate compliance with cultural resource laws, and specifically with Section 106 of the National Historic Preservation Act of 1966, as amended.

5.6.1.2 State

a. California Register of Historic Resources/California Environmental Quality Act

Compliance with the California Environmental Quality Act (CEQA) requires consideration of impacts to cultural resources as historical resources within projects, specifically CEQA Guidelines Section 15064.5(a) and 15064.5(c).

According to Section 15064.5 (a) of the CEQA Guidelines, a historical resource includes the following:

- 1. A resource listed in, or determined to be eligible for listing on, the California Register of Historical Resources,
- 2. A resource included in the local register, and
- 3. A resource which an agency determines to be historically significant.

A resource may be considered historically significant if it meets one of the following criteria for listing on the California Register of Historical Resources (CRHR; PRC Section 5024.1):

- 1. Associated with events that have made a significant contribution to the broad patterns local or regional history and cultural heritage of California or the United States.
- 2. Associated with the lives of persons important to the nation or to California's past.
- 3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values.
- 4. Has yielded, or may be likely to yield, information important in prehistory or history of the state or nation.

In addition to meeting one of the above criteria, a resource must retain enough of its integrity of location, design, setting, materials, workmanship, feeling, and association. A resource does not need to have integrity of all, but of a sufficient number so that it conveys the essence of why it might be significant in the first place (California Code of Regulations [CCR] Title 14, Chapter 11.5 Section 4852(c)). CEQA also recognizes resources listed in a local historic register or deemed significant in a historical resource survey.

A project that may cause a substantial adverse change in the significance of a historical resource may have a significant effect on the environment (Sections 15064.5(b) and 21084.1). CEQA Section 15064.5(b) defines substantial adverse change in the significance of an historical resource as the physical demolition, destruction, relocation, or alteration of an historical resource or its immediate surroundings such that the significance is materially impaired.

b. Native American Involvement

Native American involvement in the development review process is addressed by several state laws. The most notable of the state laws is Senate Bill (SB) 18 which includes detailed requirements for local agencies to consult with identified California Native American Tribes early in the planning and/or development process. The California Native American Graves Protection and Repatriation Act (NAGPRA; 2001), like the federal act, ensures that Native American human remains and cultural items are treated with respect and dignity during all phases of the archaeological evaluation process in accordance with CEQA and any applicable local regulations.

The Native American Heritage Commission (NAHC) was contacted by the City of San Diego (City) in accordance with SB 18 requirements. NAHC provided a list of tribal contacts for consultation during the review process. The City of San Diego sent consultation letters to these tribal contacts describing the Park MPU-Plans process. The letter formally invited tribal representatives to request consultation regarding the Park MPU-Plans within a 90-day period in accordance with SB 18. No responses were received.

Additionally, in April 2014 the City of San Diego sent the Notice of Preparation for the Program Environmental Impact Report to the following Native American tribes, organizations, and individuals:

- Kumeyaay Cultural Heritage Preservation
- Kumeyaay Cultural Repatriation Committee
- Barona Group of Capitan Grande Band of Mission Indians
- Campo Band of Mission Indians
- Ewiiaapaayp Tribal Office
- Inaja Band of Mission Indians
- Jamul Indian Village
- La Posta Band of Mission Indians
- Manzanita Band of Mission Indians
- Sycuan Band of the Kumeyaay Nation
- Viejas Band of Mission Indians
- Mesa Grande Band of Mission Indians
- San Pasqual Band of Mission Indians
- Ipai Nation of Santa Ysabel
- La Jolla Band of Mission Indians
- Pala Band of Mission Indians
- Pauma Band of Mission Indians
- Carmen Lucas
- Ron Christman
- Clint Linton
- Frank Brown Intertribal Cultural Resource Council

Assembly Bill 52

Assembly Bill 52 (AB 52; Chapter 532, Statutes of 2014) was passed on September 25, 2014, and applies to all projects that file a notice of preparation (NOP) or notice of negative declaration or mitigated negative declaration on or after July 1, 2015. The bill requires that a Lead Agency begin consultation with a California Native American tribe if that tribe has requested, in writing, to be kept informed of projects by the Lead Agency, prior to the determination whether a negative declaration, mitigated negative declaration, or environmental impact report will be prepared. The bill also specifies mitigation measures that may be considered to avoid or minimize impacts on tribal cultural resources. Additionally, AB 52 directs the Office of Planning and Research to revise Appendix G of the CEQA Guidelines to separate the consideration of tribal cultural resources from paleontological resources by July 1, 2016. Changes to Appendix G of the CEQA Guidelines specific to tribal cultural resources became effective on September 29, 2016.

In November 2011, the Planning Department began the initiation process to update the Mission Trails Regional Park Master Plan and develop the NRMP for the Park. During the course of the following three years, a series of public workshops were held and a NOP was released in April 2014, prior to the passage of AB 52. During this time, the City of San Diego had not received any formal requests for notification by a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed MPUPlans. Therefore, consultation under AB 52 was not required. However, the City informally consulted with the Director of Cultural Resources for the lipay Nation of Santa Ysabel in response to an email for notification in accordance with SB 18. The project scope and proposed mitigation framework was discussed and agreement was reached regarding proper treatment of Tribal Cultural Resources and no further consultation was required.

On June 30, 2016, the City received a letter and map from Mr. Clint Linton, the Director of Cultural Resources for the lipay Nation of Santa Ysabel identifying their traditionally and culturally affiliated areas within the City of San Diego's jurisdictional boundaries for the purpose of AB 52 notification which includes the MPU—area of the Plans. It should be noted that all subsequent projects implemented in accordance with the adopted MPU—Plans will be subject to the provisions of AB 52 and may require tribal consultation. The City is currently workingworked directly with Mr. Linton on the development of procedures for a meaningful consultation process on future projects.

5.6.1.3 Local

a. Historical Resources Regulations

The Historical Resources Regulations (HRR) are part of the San Diego Municipal Code (Chapter 14, Article 3, Division 2: Purpose of HRR or Sections 143.0201-143.0280). The HRR have been developed to implement applicable local, state, and federal policies and mandates. Included in these are the General Plan, CEQA, and Section 106 of the National Historic Preservation Act of 1966.

Part of the HRR consists of a Development Review Process for all projects in the City. This review process is composed of two parts: implementation of the HRR and a determination of impacts and mitigation under CEQA. The implementation of the HRR begins with the determination of the need for a survey of the project site. The need for a survey is based on historical resource information and the date and results of any previous surveys of a project site. Surveys are required if more than five years have elapsed since the last survey and the potential for resources exists. A historic property (built environment) survey is required if the structure/site is over 45 years old and appears to have integrity of setting, design, materials, workmanship, feeling, and association. Surveys must be conducted according to criteria in the Historical Resource Guidelines. If the survey results are negative, the review process is complete and no mitigation is required.

Historical resources, in the HRR context, include

... site improvements, buildings, structures, historic districts, signs, features (including significant trees or other landscaping), places, place names, interior elements and fixtures designated in conjunction with a property, or other objects of historical, archaeological, scientific, educational, cultural, architectural, aesthetic, or traditional significance to the citizens of the city.

These include structures, buildings, archaeological sites, objects, districts, or landscapes having physical evidence of human activities. These are usually over 45 years old, and they may have been altered or still be in use (City of San Diego 2001b).

In addition to direct and indirect impacts, cumulative impacts must also be addressed during the CEQA review process. Cumulative impacts are a result of individually minor but collectively significant projects occurring over a period of time. Data recovery may be considered a cumulative impact due to the loss of a portion of the resource data base. Cumulative impacts also occur in districts when several minor changes to contributing properties, their setting, or landscaping eventually results in a significant loss of integrity (City of San Diego 2001b).

b. Historical Resources Guidelines

The City's Historical Resources Guidelines amended in April 2001 are designed to implement the Historical Resources Regulations contained in Chapter 14, Division 3, Article 2 of the Land Development Code. If any resources have been recorded on the property, those resources must be evaluated for significance/importance in accordance with criteria listed in the Historical Resources Guidelines. Resources determined to be significant/important must either be avoided or a data recovery program for important archaeological sites must be developed and approved prior to permit issuance in order to assure adequate mitigation for the recovery of cultural and scientific information related to the resource's significance/importance.

5.6.2 Environmental Setting

5.6.2.1 Cultural Setting

a. Prehistoric Period

The following culture history outlines and briefly describes the known prehistoric cultural traditions within the southern California coastal and inland regions. The prehistoric cultural sequence in San Diego County is generally conceived as comprising three basic periods: the Paleoindian Period, the Archaic Period, and the Late Prehistoric Period; however, tribal legends state that tribes have been here since the beginning of time (Carmen Lucas, 2017).

Paleoindian Period (12,000-8,500 B.P.)

The Paleoindian Period in San Diego County is most closely associated with the San Dieguito Complex as identified by Rogers (1938, 1939, 1945). The San Dieguito assemblage consists of well-made scraper planes, choppers, scraping tools, crescentics, elongated bifacial knives, and leaf-shaped points (Warren et al. 1993:III-33). Only a trace of this period can be found in the Park (MTRP History 2011).

Archaic Period (8,500–1,500 B.P.)

The Archaic Period in coastal San Diego County is represented by the La Jollan Complex, a local manifestation of the widespread Millingstone Horizon. This period brings an apparent shift toward a more generalized economy and an increased emphasis on seed resources, small game, and shellfish. Along with an economic focus on gathering plant resources, the settlement system appears to have been more sedentary. The La Jollan assemblage is dominated by rough, cobblebased choppers and scrapers, and slab and basin metates. Elko series projectile points (large sidenotched points) appeared late in the period. Only a few archaeological sites dating to this period can be found in the Park (MTRP History 2011).

Late Prehistoric Period (1,500–180 B.P.)

Near the coast and in the Peninsular Mountains beginning approximately 1,500 years ago, patterns began to emerge which suggest that the ancestors of the ethnohistoric Kumeyaay occupied the

area. This period is characterized by higher population densities and elaborations in social, political, and technological systems and is referred to as the Cuyamaca Complex. The Cuyamaca Complex is characterized by the presence of steatite arrowshaft straighteners, steatite pendants, steatite comales (heating stones), Tizon Brown Ware pottery, ceramic figurines reminiscent of Hohokam styles, ceramic "Yuman bow pipes," ceramic rattles, miniature pottery, various cobble-based tools (e.g., scrapers, choppers, hammerstones), bone awls, manos and metates, mortars and pestles, Desert Side-Notched (more common) and Cottonwood Series projectile points (True 1970) and cremation burial practices. The majority of the archaeological sites within the Park date to the Late Prehistoric Period.

b. Ethnographic Background

Over 30 sites in the study area can be associated with the Kumeyaay (MTRP History 2011). The Kumeyaay (also known as Kamia, Ipai, Tipai, and Diegueño) occupied the southern two-thirds of San Diego County, and therefore the Park (Luomala 1978). The Kumeyaay lived in semi-sedentary, politically autonomous villages, or rancherias. A settlement system typically consisted of two or more seasonal villages with temporary camps radiating away from these central places (Cline 1984). Their economic system consisted of hunting and gathering, with a focus on small game, acorns, grass seeds, and other plant resources. A wide range of tools was made of locally available and imported materials, including scrapers, choppers, flake-based cutting tools, and biface knives. Preferred stone types of metavolcanics, cherts, and quartz were locally available. Obsidian was imported from the deserts to the north and east. Ground stone objects include mortars and pestles typically made of locally available fine-grained granite. Both portable and bedrock types are known. The Kumeyaay made fine baskets and pottery, using the paddle-and-anvil technique. Most were a plain brown utility ware called Tizon Brown Ware, but some were decorated (May 1978; Spier 1923).

c. Historic Period

The Spanish Period (1769–1821) begins with the founding of the Mission San Diego de Alcalá and Presidio de San Diego. The mission had vast tracts of land on which cattle, horses, sheep, and goats grazed. As the mission matured and soldiers from the Presidio married and retired, large land grants were made to well-connected individuals to encourage settlement. The rancho system developed with cattle hides and tallow as the principal Alta California export (Rolle 1998). European contact substantially and pervasively stressed the social, political, and economic fabric of the Native American culture (Shipek 1986). Disease, starvation, and a general institutional collapse caused emigration, birth rate declines, and high adult and infant mortality levels for the Native American groups in San Diego County (Cook 1976).

During the Mexican Period (1822–1848), the mission system was secularized by the Mexican government. Secularization opened up vast lands formerly belonging to the Catholic Church, and many more land grants were made. The southern California economy became increasingly based on cattle ranching. The Mexican Period ended when Mexico signed the Treaty of Guadalupe Hidalgo on February 2, 1848, concluding the Mexican-American War (1846–1848). California became a state in 1850 (Rolle 1998).

After the Treaty of Guadalupe Hidalgo in 1848 (beginning of the American Period), the population in San Diego County more than tripled (Pourade 1963). By the late 1800s, development in the county was well under way with the beginnings of a recognizable downtown San Diego area and the gradual development of a number of outlying communities, many of which were established around previously defined ranchos and land grants. A rural community cultural pattern existed in San Diego County from approximately 1870 to 1930. They lived on scattered farmsteads tied together through a common school district, church, post office, and country store (Hector and Van Wormer 1986).

The central core of the Park and East Elliott were part of two large land grants: Mission San Diego and El Cajón. During the Spanish Period, the El Cajón land grant was operated by the Catholic Church and used for cattle, vineyards, and corn fields. After secularization, it was granted to Doña Maria Antonia Estudillo de Pedrorena in 1845. During the Civil War the land grant began to be sold in pieces. In 1868, the largest section of the remaining land was sold to Isaac Lankershim, who grew wheat. Others had citrus groves and vineyards prior to the growth of communities such as El Cajon, Lakeside, and Santee (Pourade 1969).

Rancho de la Mission San Diego de Alcalá was run by Father Junipero Serra during the Spanish Period. The church grew wheat, corn, and beans and had vineyards and olive groves as well as cattle, sheep, pigs, and goats. The Old Mission Dam and Flume were built across Mission Gorge by Indian laborers after droughts in 1801 and 1803. Construction was completed in 1815. During the Mexican Period in 1846, Santiago Arguello was granted the land and was to pay the mission's debts, support the priests, and maintain religious services. The lands were opened to settlement after his death in 1885 (Pourade 1969). After secularization, the dam and flume were not maintained.

After 1885, the study area contained a number of ranches and farms. Granite mining took place in Mission Gorge starting in 1873. Sand and gravel were also extracted. Present-day Kumeyaay Lake is the result of these rock removal operations. The study area, including the West Sycamore and East Elliott areas, was also used by the military for artillery target training exercises during World War I. During World War II and the Korean War, the area was used for infantry, tank, and artillery training. Hikers have used the area as early as the 1920s (MTRP History 2011).

5.6.2.2 Identification Efforts

a. Records Search and Literature Review

A records search of the study area was requested from the South Coastal Information Center using the California Historical Resources Information System to identify previous studies in the area and to locate known cultural resources. The results can be found in Confidential Attachment 1. A total of 91 investigations have been conducted within the Park. The majority of the areas, including Lake Murray, Cowles Mountain, Mission Gorge, Fortuna Mountain, and East Elliott areas have been surveyed in the past. The Cowles Mountain, Mission Gorge, and Fortuna Mountain areas were surveyed in 1978 (Hanna 1978) and portions were surveyed later in 1991 (Dames and Moore 1991) and in 1993 (Glenn 1993). The entire East Elliott area was surveyed in 1988 (Hector 1988). Sycamore Landfill in the East Elliott area was re-surveyed in 1995 (Robbins-Wade 1995). Less than 50 percent of the West Sycamore area has been surveyed, and there may be unrecorded archaeological sites in this unsurveyed area. The most current survey in the West Sycamore area was completed in 2010

(Garcia-Herbst et al. 2010). Both prehistoric and historic cultural resources have been recorded throughout the entire study area.

A total of 173 cultural resources (112 archaeological sites and 61 isolated artifacts) that reflect the major themes of prehistory, mining, transportation, ranching, and military activity have been recorded within the study area (see Appendix C). Isolates consist of one or two prehistoric artifacts and are not considered significant historical resources under City of San Diego or CEQA criteria and are not included in the discussion of potential impacts and, therefore, will not be further discussed.

The types of sites that occur within the study area include the following:

- Prehistoric/Native American bedrock milling stations, seasonally used places usually for the
 processing of plant remains; through the pounding and grinding of acorns, seeds and other
 materials on bedrock surfaces, various types of depressions are created, which have been
 termed slicks, metates, basins, ovals, mortars, and cupules.
- Prehistoric/Native American campsites or villages, seasonally or year-round occupied sites
 containing cultural remains from daily life, stone tools and manufacturing debris, pottery,
 shellfish and animal bones in midden deposits.
- Prehistoric/Native American sacred or ceremonial places, e.g., rock art sites, Cowles
 Mountain solstice site, in the latter case where no physical remains may be found, but the
 importance of place is nonetheless significant in the minds and spirits of local Native
 peoples like the Kumeyaay.
- Historic era settlements from the Spanish, Mexican or American periods, possibly related to the Presidio, Mission, Padre Dam, villages, Old Town pueblo, farming and ranching, sand and mine operations, leaving their cultural traces in the form of remains like building foundations and walls, trash pits, privies, and domestic, business, and manufacturing debris.

Of the 112 recorded sites within the study area, 5 sites have been determined eligible for listing on the CRHR. Test excavations have been completed at two (CA-SDI-203 and -13227/H) of these sites in order to make that determination. The other three sites are at the Old Mission Dam and Flume (P-37-020910, CA-SDI-6658H and -6660H). The Old Mission Dam and Flume sites have been recorded and documented along different segments, and thus three different permanent numbers have been assigned and have been counted three times. The Old Mission Dam and Flume sites have been listed on the National Register of Historic Places (NRHP), designated as California Historic Landmark #52, and listed as San Diego Historical Resources Board Landmark #2.

Seventeen additional sites (P-37-014261, CA-SDI-9240, CA-SDI-10026, CA-SDI-11057, CA-SDI-11081, CA-SDI-11280, CA-SDI-11281, CA-SDI-11282, CA-SDI-11283, CA-SDI-11284, CA-SDI-11285, CA-SDI-11286, CA-SDI-11287, CA-SDI-11288, CA-SDI-11606, CA-SDI-13592, and CA-SDI-13593) have been tested for significance; however, no significance determinations were noted on the site forms for 15 of the sites. Of these 15 sites, 10 had no subsurface deposits as noted in the site forms. The other 2 sites (P-37-014261 and CA-SDI-11081) were determined not eligible for listing on the CRHR.

The historic component of CA-SDI-15881 was determined not eligible for the NRHP. No determination was made for the prehistoric component of CA-SDI-15881.

In summary, of the 173 cultural resources, 5 (3 Old Mission Dam, 1 prehistoric, and 1 multi-component sites) have been confirmed significant, 63 (61 isolates, 2 sites) are not significant, and a significance determination has not been made for 105 cultural resources. Table 2 in Appendix C presents the current status of the 112 cultural resources sites based on site form data and visual inspection using an aerial photograph. The visual inspection was completed by superimposing the digitized site locations on a current aerial photograph of the study area and noting if there was any development such as trails. A number of cultural resources currently have authorized and unauthorized trails that bisect their site boundaries. Some have been destroyed by road construction.

5.6.3 Thresholds of Significance

Historical resources significance determination, pursuant to the City's 2016 Significance Determination Thresholds, consists first of determining the sensitivity or significance of identified historical resources and, secondly, determining direct and indirect impacts that would result from project implementation.

Based on the City's 2016 Significance Determination Thresholds, that have been adapted for purposes of the programmatic analysis of the proposed Plans and associated discretionary actions, impacts related to historical resources would be significant if implementation of the <u>MPU-Plans</u> and associated discretionary actions would:

- 1. Result in an alteration, including the adverse physical or aesthetic effects and/or the destruction of a prehistoric or historic archeological site or historic building (including an architecturally significant building), structure, or object or site;
- 2. Result in an adverse impact to a prehistoric archaeological resource including religious or sacred use sites;
- 3. Result in an adverse impact to a prehistoric archeological resource including human remains.

Additionally, a significant impact related to tribal cultural resources would occur if the project would:

- 4. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:
 - a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
 - b) A resource determined by the Lead Agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c)

of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American.

5.6.4 Impact Analysis

Issue 1: Prehistoric or Historical Resources

Would implementation of the Plans and associated discretionary actions result in an alteration, including the adverse physical or aesthetic effects and/or destruction of a prehistoric or historic archaeological site or historic building (including an architecturally significant building), structure, object, or site?

The City's Historical Resources Guidelines (April 2011) and CEQA Significance Thresholds (July 2016) provide criteria for evaluating impacts on cultural resources, which include direct, indirect, and cumulative impacts. Examples of direct impacts would include:

- Mass grading
- Permanent and temporary road construction
- Excavation for sewer and water pipelines
- Staging areas
- Access roads
- Demolition, grading, and excavation activities
- Deterioration due to neglect
- Alteration or repairs to a historic structure
- Inappropriate repair
- New addition
- Relocation from original site, or
- Isolation of a historic resource from its setting, when the setting contributes to its significance
- Soil stockpiling
- Construction of trails in open space or
- Increased awareness or exposure of a resource.

Indirect impacts in the built environment include the introduction of visual, audible, or atmospheric effects that are out of character with the cultural resource or alter its setting, when the setting contributes to a property's significance. Examples include, but are not limited to, the construction of a large-scale building, structure, object, or public works project that has the potential to cast shadow patterns on the cultural resource, intrude into its viewshed, generate substantial noise or vibrations, or substantially increase air pollution or wind patterns. For archaeological resources and tribal cultural resources, indirect impacts are often the result of increased public accessibility to resources not otherwise subject to impacts, which would result in an increased potential for vandalism and site destruction. Placing sites into open space does not always mean that there would not be the potential for indirect impacts on the resource. Since open space boundaries can change during the project review as a result of environmental design and/or community constraints, resources placed into open space need to be evaluated for indirect impacts.

Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time. The loss of a historical resource due to mitigation by data recovery could be considered a cumulative impact. In the built environment, cumulative impacts most often occur to districts, where several minor changes to contributing properties, their landscaping, or to their setting over time result in a significant loss of integrity.

Impact thresholds are dependent on whether the cultural resource is important enough to qualify as a historical resource. There are three regulatory frameworks used to evaluate the significance of a cultural resource: federal, state, and local. Under these frameworks, agencies are required to determine how a project could affect a significant cultural resource. Under federal regulations, significant cultural resources are called historic properties and under CEQA and the city guidelines, they are called historical resources.

If a resource qualifies as an historical resource under CEQA, it must then be determined how the project could affect those qualities that make a resource significant in accordance with CEQA. Once it is known how a project would affect a resource, it is then possible to address whether the effect on the resource is adverse.

It is estimated that most of the areas were surveyed over 20 years ago. Less than 50 percent of the West Sycamore area has been surveyed for cultural resources. It should be noted that studies that are more than 3 years old generally need to be updated. Conditions related to weather, vegetation or ground cover, accessibility, and more could affect the adequacy of any cultural resource survey. These must all be weighed against the context and intensity of any subsequent project proposed in accordance with the Plans.

The NRMP includes management actions that have been set forth in order to protect sensitive biological resources. Some of these actions would involve limited soil disturbance, such as the installation of exclusionary fencing, erosion control measures, and weeding. Although the soil disturbance would be rather limited, the potential exists that these activities could disturb historical resources. Additional impacts could result from the removal of UXO by the U.S. Army Corps of Engineers should this be identified prior to or during implementation of management actions. Removal of UXO could require excavation and thus soil disturbance.

The MPU includes management recommendations for protection of cultural resources while providing recreational opportunities. Management Recommendation Number 4 states "protect and manage identified cultural resources through proper planning for avoidance of significant impacts, maintain site identification markings as appropriate, enforce historic preservation regulations for all park users, and develop and maintain an archaeological site monitoring program" and Recommendation Number 5 states "develop a plan in cooperation with interested local historical and archaeological groups, local Native American tribes, and educational institutions to promote public participation in historic preservation and enjoyment of cultural resources within MTRP." Despite these management recommendations, MPU planning, facility, and habitat/species recommendations include the types of subsequent projects that could cause adverse impacts on historical resources. Projects that will require disturbing in situ soils have the highest potential to adversely impact historical resources. Some of these subsequent projects may include picnic tables, shade structures, and additional parking areas; installing new trails, improving existing trails, rerouting trails, and closing and restoring unauthorized trails. As noted above, removal of UXO could

also result in an adverse impact to historical resources. Because construction of these types of projects could occur within areas known to contain historical resources, each subsequent project implemented in accordance with the <u>MPUPlans</u> would need to be evaluated independently for its potential impacts on historical resources depending upon the context and intensity of impacts on the environment.

Overall, potential impacts associated with implementation of the Plans would be significant (**Impact HIST-1**).

Issue 2: Religious or Sacred Uses

Would implementation of the Plans and associated discretionary actions adversely impact a prehistoric archaeological resource including religious or sacred uses?

Cultural use of the Park by the Kumeyaay people has been well documented, both historically and prehistorically and their story is told in a permanent exhibit in the Park Visitor's Center which provides a window into the significance of the area to the tribal community. As such, the potential for religious or sacred uses to be impacted during future construction activities associated with implementation of the MPUPlans is high, particularly considering the Park has been previously identified as an area of concern to the local Native American community, along with areas along waterways, where prehistoric resources are most likely to be found. The impact analysis for Issue 2 would be the same as outlined above for Issue 1 with the inclusion of an analysis of potential impacts to religious or sacred uses. Spirituality of place is often impossible to define because it transcends material remains, which archaeologists cannot recover during significance testing or data recovery programs. Therefore, significant impacts could occur to religious or sacred uses associated with subsequent projects implemented in accordance with the Plans. These impacts would be significant.

Impacts on known archaeological resources associated with religious or sacred uses, and those not yet found and formally recorded, could occur anywhere within the Park. Grading of original in situ soils could also expose buried archaeological resources and features including sacred sites. Potential impacts on archaeological religious or sacred uses associated with subsequent projects implemented in accordance with the Plans would be considered significant (Impact HIST-2).

Issue 3: Human Remains

Would implementation of the Plans and associated discretionary actions adversely impact a prehistoric archaeological resource including human remains?

Impacts on human remains may be unavoidable in certain circumstances, especially when resources are discovered during resource evaluation or construction-related activities. When a subsequent project is submitted in accordance with the MPUPlans, especially in areas of high archaeological resource sensitivity, consultation in accordance with AB 52 would be initiated and the potential for impacting human remains would be considered during the consultation process. Additionally, subsequent projects would be subject to the City's environmental review process to ensure compliance with federal, state, and local criteria for the appropriate treatment of human remains.

The discovery of human remains also demands that certain laws and protocols be followed before proceeding with any action that might disturb the remains further. If human remains are discovered, then the provisions set forth in California Public Resources Code Section 5097.98 and State Health and Safety Code Section 7050.5 would be implemented in consultation with the assigned Most Likely Descendant as identified by the NAHC.

While it is preferable in all cases to avoid impacting human remains, this is not always possible given the uncertainties of unanticipated discoveries during construction. In the vicinity of a known cemetery or a prehistoric archaeological site suspected to be over 1,500 years old, interments are possible. Background research could help identify possible burial locations related to historic era properties. Forensic dogs or other nondestructive ground-penetrating techniques could help identify subsurface anomalies that might be related to the presence of burials. Forensic dogs have also been useful on sites where scattered cremation remains are present. When data recovery of an archaeological site is required, all possible pre-excavation planning would be implemented to guard against the accidental discovery of human remains. This would also apply to subsequent destruction of an archaeological site during project implementation because archaeological data recovery can never fully recover all the data from a site.

Potential impacts associated with the disturbance and/or discovery of human remains would be significant (**Impact HIST-3**), and mitigation is required.

Issue 4: Tribal Cultural Resources

Would <u>implementation of the Plans and associated discretionary actions</u> the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

- a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
- b) A resource determined by the Lead Agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American?

Subsequent projects implemented in accordance with the adopted MPUPlans would be subject to the provisions of AB 52 and may require tribal consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed MPUPlans. Future AB 52 consultation may identify tribal cultural resources not yet found and formally recorded anywhere within the Park that could be impacted by subsequent projects. Grading of original in situ soils could also expose buried tribal cultural resources and features including sacred sites. Potential impacts on tribal cultural resources associated with subsequent projects implemented in accordance with the Plans would be significant (Impact HIST-4).

5.6.5 Significance of Impact

Issue 1: Prehistoric or Historical Resources

Impacts on known prehistoric or historic resources (both archaeological and built environment) and those not yet found and formally recorded could occur anywhere in association with implementation of the Plans. Grading of original in situ soils could also expose buried archaeological resources and features. Potential impacts on historical resources associated with subsequent projects implemented in accordance with the Plans would be considered significant (Impact HIST-1).

Issue 2: Religious or Sacred Uses

Impacts on known archaeological resources associated with religious or sacred uses, and those not yet found and formally recorded, could occur anywhere within the Park. Grading of original in situ soils could also expose buried archaeological resources and features including sacred sites. Potential impacts on archaeological religious or sacred uses associated with subsequent projects implemented in accordance with the Plans would be considered significant (Impact HIST-2).

Issue 3: Human Remains

Impacts associated with the disturbance and/or discovery of human remains could occur anywhere within the Park where grading of original in situ soils occur. Potential impacts on human remains associated with subsequent projects implemented in accordance with the Plans would be significant (Impact HIST-3).

Issue 4: Tribal Cultural Resources

Impacts on tribal cultural resources not yet found and formally recorded could occur anywhere within the Park. Grading of original in situ soils could also expose buried tribal cultural resources and features including sacred sites. Potential impacts on tribal cultural resources associated with subsequent projects implemented in accordance with the Plans would be considered significant (Impact HIST-4).

5.6.6 Mitigation Framework

The following mitigation framework would reduce impacts HIST-1 through HIST-4 to less than significant. Impact HIST-1 would be minimized through implementation of management recommendations for the protection of cultural resources included in the MPU. The Mitigation Framework detailed under MM-HIST-1a and MM-HIST-1b identifies the process of implementing those recommendations and would be required for future projects with the potential to impact historical resources.

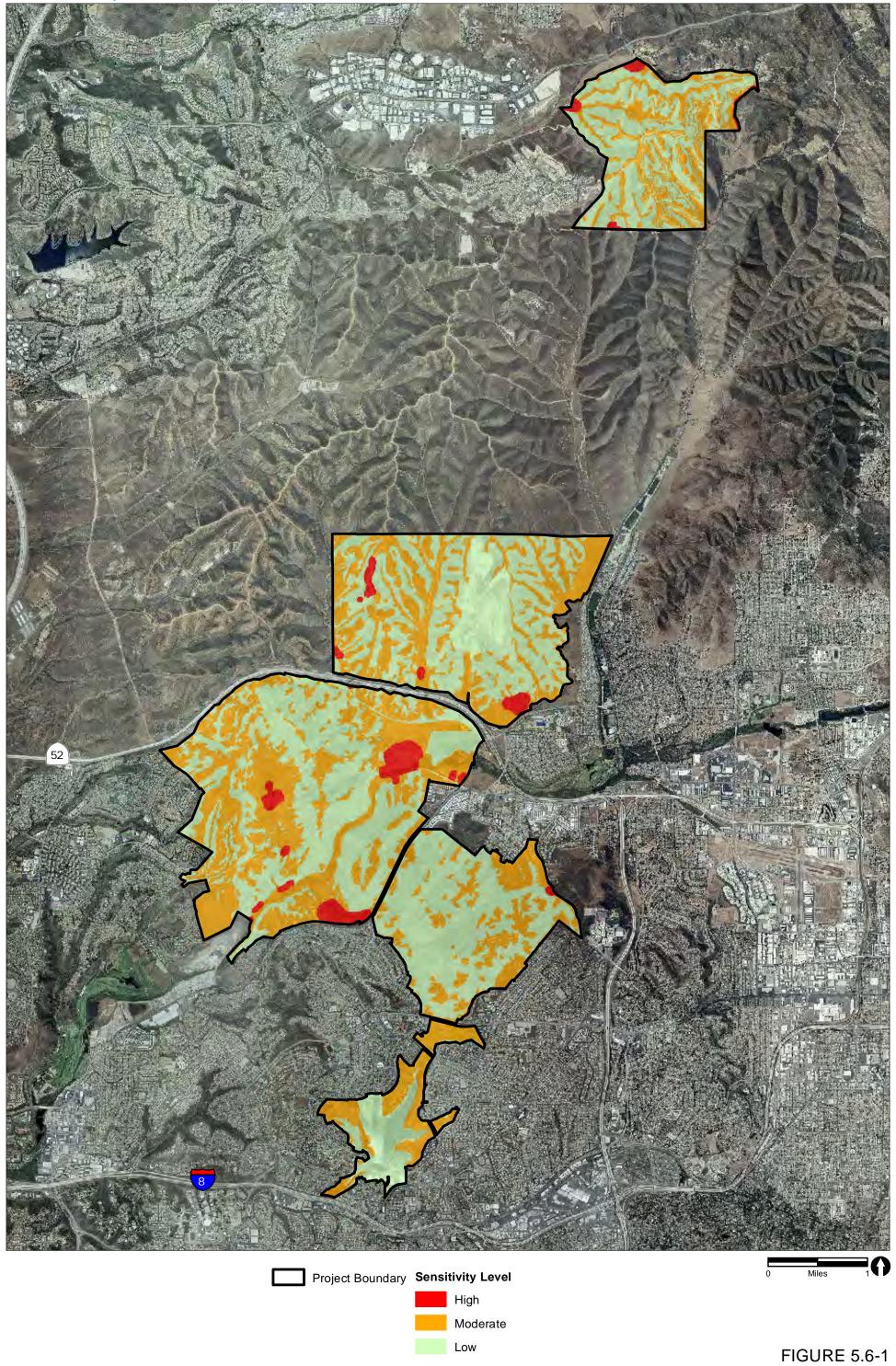
MM-HIST-1a: Archaeological and Tribal Cultural Resources

Prior to issuance of any development permit for a subsequent project tiering off of the MPUPlans that could directly affect an archaeological or tribal cultural resource; the City shall require the following steps be taken to determine: (1) the presence of archaeological or tribal cultural resources and (2) the appropriate mitigation for any significant resources which may be impacted by a development activity. Sites may include, but are not limited to, privies, trash pits, building foundations, and industrial features representing the contributions of people from diverse socioeconomic and ethnic backgrounds. Resources may also include resources associated with prehistoric Native American activities.

Initial Determination

The environmental analyst shall determine the likelihood for the project site to contain historical resources by reviewing site photographs and existing historic information (e.g., Archaeological Sensitivity Maps, the Archaeological Map Book, and the California Historical Resources Inventory System and the City's "Historical Inventory of Important Architects, Structures, and People in San Diego") and may conducti a site visit. An archaeological sensitivity map was created from the record search data as a management tool to aid in siting of future projects. There are three levels of sensitivity (Figure 5.6-1). The levels are not part of any federal or state law. The levels are described below.

- High Sensitivity: These areas contain known significant cultural resources and have a potential to yield information to address a number of research questions. These areas may have buried deposits, good stratigraphic integrity, and preserved surface and subsurface features. If a project were to impact these areas, a survey and testing program would be required to further define resource boundaries subsurface pressure or absence and determine level of significance. Mitigation measures such as ADRP and construction monitoring shall also be required.
- Medium Sensitivity: These areas contain recorded cultural resources or have a potential for resources to be encountered. The significance of the cultural resources within these areas is not known. If a project were to impact these areas, a survey and significance evaluation would be required if cultural resources were identified during the survey. Mitigation measures may also be required.
- Low Sensitivity: These areas have slopes greater than 25 degrees. Steep slopes have a low potential for archaeological deposits because they were not occupied by prehistoric peoples but rather used for gathering and other resource procurement activities. The majority of these activities do not leave an archaeological signature. If a project were to impact these areas, a survey would be needed to confirm the lack of cultural resources. Should cultural resources be identified, a significance evaluation would be required followed by mitigation measures.



Review of this map should be done at the initial planning stage of a specific project to ensure that cultural resources are avoided and/or impacts are minimized in accordance with the Historical Resources Guidelines. If there is any evidence that the project area contains archaeological or tribal cultural resources, then an archaeological evaluation consistent with City Guidelines would be required. All individuals conducting any phase of the archaeological evaluation program must meet professional qualifications in accordance with the City's Historical Resources Guidelines.

Step 1

Based on the results of the initial determination, if there is evidence that the project area contains archaeological resources, preparation of an evaluation report is required. The evaluation report could generally include background research, field survey, archaeological testing, and analysis. Before actual field reconnaissance would occur, background research is required that includes a record search at the South Coastal Information Center at San Diego State University. A review of the Sacred Lands File maintained by the NAHC must also be conducted at this time. Information about existing archaeological collections should also be obtained from the San Diego Archaeological Center and any tribal repositories or museums.

Once the background research is complete, a field reconnaissance must be conducted by individuals whose qualifications meet City standards. Consultants are encouraged to employ innovative survey techniques when conducting enhanced reconnaissance including, but not limited to, remote sensing, ground penetrating radar, human.remains.detection.canines, LiDAR, and other soil resistivity techniques as determined on a case-by-case basis https://human.remains.detection.canines, <a href="https://human.remains.detection.canines, <a hre

Step 2

Where a recorded archaeological site or tribal cultural resource (as defined in the Public Resources Code) is identified, the City shall initiate consultation with identified California Indian tribes pursuant to the provisions in Public Resources Code Sections 21080.3.1 and 21080.3.2, in accordance with AB 52. It should be noted that during the consultation process, tribal representative(s) will be involved in making recommendations regarding the significance of a tribal cultural resource which also could be a prehistoric archaeological site. A testing program may be recommended which requires reevaluation of the proposed project in consultation with the Native American representative, which could result in a combination of project redesign to avoid and/or preserve significant resources, as well as mitigation in the form of data recovery and monitoring (as recommended by the qualified archaeologist and Native American representative). The archaeological testing program, if required, shall include evaluating the horizontal and vertical dimensions of a site, the chronological placement, site function, artifact/ecofact density and variability, presence/absence of subsurface features, and research potential. A thorough discussion of testing methodologies including surface and subsurface investigations can be found in the City of San Diego's Historical Resources Guidelines, Results of the consultation process will determine the nature and extent of any additional archaeological evaluation or changes to the proposed project.

The results from the testing program will be evaluated against the Significance Thresholds found in the Guidelines. If significant historical resources are identified within the area of potential effects, the site may be eligible for local designation. However, this process would not proceed until such time that the tribal consultation has been concluded and an agreement is reached (or not reached) regarding significance of the resource and appropriate mitigation measures are identified. The final testing report must be submitted to Historical Resources Board (HRB) staff for eligibility determination and possible designation. The final testing report and supporting documentation are used by HRB staff in consultation with qualified City staff with technical expertise in archaeology or cultural resources management to ensure that adequate information is available to demonstrate eligibility for designation under the applicable criteria. This process is completed prior to distribution of a draft environmental document.

An agreement on the appropriate form of mitigation is required prior to distribution of a draft environmental document. If no significant resources are found and site conditions are such that there is no potential for further discoveries, then no further action is required. Resources found to be non-significant as a result of a survey and/or assessment will require no further work beyond documentation of the resources on the appropriate Department of Parks and Recreation site forms and inclusion of results in the survey and/or assessment report. If no significant resources are found, but results of the initial evaluation and testing phase indicates there is still a potential for resources to be present in portions of the property that could not be tested, then mitigation monitoring is required.

Step 3

Preferred mitigation for archaeological resources is to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm shall be taken. For archaeological resources where preservation is not an option, a Research Design and Data Recovery Program is required, which includes a Collections Management Plan for review and approval. When tribal cultural resources are present and also cannot be avoided, appropriate and feasible mitigation will be determined through the tribal consultation process and incorporated into the overall data recovery program, where applicable, or project-specific mitigation measures incorporated into the project. The data recovery program shall be based on a written research design and is subject to the provisions as outlined in CEQA Section 21083.2. The data recovery program must be reviewed and approved by the City's Environmental Analyst prior to distribution of a draft CEQA document and shall include the results of the tribal consultation process. Archaeological monitoring may be required during building demolition and/or construction grading when significant resources are known or suspected to be present on a site, but cannot be recovered prior to grading due to obstructions such as, but not limited to, existing development or dense vegetation.

A Native American observer must be retained for all subsurface investigations, including geotechnical testing and other ground disturbing activities whenever a tribal cultural resource or any archaeological site located on City property, or within the area of potential effects of a City project, would be impacted. In the event that human remains are encountered during data recovery and/or a monitoring program, the provisions of California Public Resources Code Section 5097 must be followed. In the event that human remains are discovered during project grading, work shall halt

in that area and the procedures set forth in the California Public Resources Code (Section 5097.98) and State Health and Safety Code (Section 7050.5), and in the federal, state, and local regulations described above shall be undertaken. These provisions would be outlined in the Mitigation Monitoring and Reporting Program included in a subsequent project-specific environmental document. The Native American monitor shall be consulted during the preparation of the written report, at which time they may express concerns about the treatment of sensitive resources. If the Native American community requests participation of an observer for subsurface investigations on private property, the request shall be honored.

Step 4

Archaeological Resource Management reports shall be prepared by qualified professionals as determined by the criteria set forth in Appendix B of the Guidelines. The discipline shall be tailored to the resource under evaluation. In cases involving complex resources, such as traditional cultural properties, rural landscape districts, sites involving a combination of prehistoric and historic archaeology, or historic districts, a team of experts will be necessary for a complete evaluation. Specific types of historical resource reports are required to document the methods (see Section III of the Guidelines) used to determine the presence or absence of historical resources; to identify the potential impacts from proposed development and evaluate the significance of any identified historical resources; to document the appropriate curation of archaeological collections (e.g., collected materials and the associated records); in the case of potentially significant impacts to historical resources, to recommend appropriate mitigation measures that would reduce the impacts to below a level of significance; and to document the results of mitigation and monitoring programs, if required.

Archaeological Resource Management reports shall be prepared in conformance with the California Office of Historic Preservation "Archaeological Resource Management Reports: Recommended Contents and Format" (see Appendix C of the Historical Resources Guidelines), which will be used by Environmental staff in the review of archaeological resource reports. Consultants must ensure that archaeological resource reports are prepared consistent with this checklist. This requirement will standardize the content and format of all archaeological technical reports submitted to the City. A confidential appendix must be submitted (under separate cover), along with historical resource reports for archaeological sites and tribal cultural resources, containing the confidential resource maps and records search information gathered during the background study. In addition, a Collections Management Plan shall be prepared for projects that result in a substantial collection of artifacts, which must address the management and research goals of the project, the types of materials to be collected and curated based on a sampling strategy that is acceptable to the City of San Diego. Appendix D (Historical Resources Report Form) may be used when no archaeological resources were identified within the project boundaries.

Step 5

For Archaeological Resources: All cultural materials, including original maps, field notes, non-burial related artifacts, catalog information and final reports recovered during public and/or private development projects must be permanently curated with an appropriate institution, one which has the proper facilities and staffing for insuring research access to the collections consistent with state and federal standards unless otherwise determined during the tribal consultation process. In the

event that a prehistoric and/or historical deposit is encountered during construction monitoring, a Collections Management Plan would be required in accordance with the project Mitigation Monitoring and Reporting Program. The disposition of human remains and burial- related artifacts that cannot be avoided or are inadvertently discovered is governed by state (i.e., AB 2641 [Coto] and California Native American Graves and Repatriation Act [NAGPRA] of 2001 [Health and Safety Code 8010-8011]) and federal (i.e., federal NAGPRA [USC 3001-3013]) law, and must be treated in a dignified and culturally appropriate manner with respect for the deceased individual(s) and their descendants. Any human bones and associated grave goods of Native American origin shall be turned over to the appropriate Native American group for repatriation.

Arrangements for long-term curation of all recovered artifacts must be established between the applicant/property owner and the consultant prior to the initiation of the field reconnaissance. When tribal cultural resources are present, or non-burial-related artifacts associated with tribal cultural resources are suspected to be recovered, the treatment and disposition of such resources will be determined during the tribal consultation process. This information must then be included in the archaeological survey, testing, and/or data recovery report submitted to the City for review and approval. Curation must be accomplished in accordance with the California State Historic Resources Commission's Guidelines for the Curation of Archaeological Collections (dated May 7, 1993) and, if federal funding is involved, Title 36 of the Code of Federal Regulations Part 79. Additional information regarding curation is provided in Section II of the Historical Resources Guidelines.

MM-HIST-1b: Built Environment Resources

Prior to issuance of any development permit for a subsequent project tiering off the MPUPlans that could directly affect historic buildings, structures, districts, or objects, the City shall require the following steps be taken to determine: (1) the presence of built environment resources and (2) the appropriate mitigation for any significant resources which may be impacted by a development activity. The mitigation would be the same as of HIST-1a. The mitigation framework shall include an evaluation following the requirements in the Historical Resources Regulations and Guidelines as indicated below.

Prior to issuance of any permit that would directly or indirectly affect a building/structure in excess of 45 years of age, the City shall determine whether the affected building/structure meets any of the following criteria: (1) National Register-Listed or formally determined eligible, (2) California Register-Listed or formally determined eligible, or (4) meets the CEQA criteria for a historical resource. The evaluation of historic architectural resources would be based on criteria such as: age, location, context, association with an important person or event, uniqueness, or structural integrity as indicated in the Historical Resources Guidelines and Historic Resources Regulations (San Diego Municipal Code Sections 143.0201–143.0280).

Preferred mitigation for historic buildings or structures is to avoid the resource through project redesign. If the resource cannot be entirely avoided, all prudent and feasible measures to minimize harm to the resource shall be taken. Depending upon project impacts, measures can include, but are not limited to, the following:

- a. Preparing a historic resource management plan.
- b. Designing new construction that is compatible in size, scale, materials, color, and workmanship to the historic resource (such additions, whether portions of existing buildings or additions to historic districts, shall be clearly distinguishable from historic fabric).
- c. Repairing damage according to the Secretary of the Interior's Standards for Rehabilitation.
- d. Screening incompatible new construction from view through the use of berms, walls, and landscaping in keeping with the historic period and character of the resource.

Specific types of historical resource reports are required to document the methods (see Section III of the Historical Resources Guidelines) used to determine the presence or absence of historical resources; to identify the potential impacts from proposed development and evaluate the significance of any identified historical resources. If potentially significant impacts to an identified historical resource are identified, these reports will also recommend appropriate mitigation to reduce the impacts to below a level of significance, where possible. If required, mitigation programs can also be included in the report.

5.6.7 Significance after Mitigation

Issue 1: Prehistoric or Historical Resources

Although implementation of the Plans would have the potential to result in significant direct and indirect impacts to archaeological, tribal cultural, and historic built-environment resources, subsequent projects would be required to implement the Mitigation Framework (MM-HIST-1a and MM-HIST-1b) prior to implementation. The Mitigation Framework requires site-specific environmental review, analysis of potential impacts, tribal consultation, and recommendations for mitigation to reduce significant impacts to below a level of significance at the program level.

Issue 2: Religious or Sacred Uses

Future projects implemented in accordance with the Plans that would have the potential to result in significant direct and indirect impacts to religious or sacred uses would be required to implement the Mitigation Framework (MM-HIST-1a). This Mitigation Framework, which includes the City's regulatory requirements, along with federal and state regulations, combined with the policies of the General Plan and the MPU, as well as consultation with Native American groups early in the development review process would ensure that potentially significant impacts to religious or sacred uses would be reduced to below a level of significance at the program-level.

Issue 3: Human Remains

Future projects implemented in accordance with the Plans that would have the potential to result in impacts associated with the discovery of human remains would be required to implement the Mitigation Framework (MM-HIST-1a). This Mitigation Framework, which includes the City's regulatory requirements along with federal and state regulations set forth in California Public Resources Code Section 5097.98 and State Health and Safety Code Section 7050.5, combined with the policies of the General Plan and the MPU, as well as consultation with Native American groups early in the development review process would ensure that potentially significant impacts associated with the discovery of human remains would be reduced to below a level of significance at the program-level.

Issue 4: Tribal Cultural Resources

Future projects implemented in accordance with the Plans that would have the potential to result in significant direct and indirect impacts to tribal cultural uses would be required to implement the Mitigation Framework (MM-HIST-1a). This Mitigation Framework, which includes the City's regulatory requirements, along with federal and state regulations, combined with the policies of the General Plan and the MPU, as well as consultation with Native American groups consistent with AB 52 early in the development review process would ensure that potentially significant impacts to tribal cultural resources would be reduced to below a level of significance at the program-level.

5.7 Human Health, Public Safety, and Hazardous Materials

This section addresses potential impacts to human health and public safety including the potential for exposure to hazards and hazardous materials, wildfire hazards, and unexploded ordnance (UXO) that could result from implementation of the Master Plan Update (MPU) and Natural Resources Management Plan (NRMP) (collectively, the Plans for the Mission Trails Regional Park Park. It is based on the hazardous materials technical study (Appendix D) prepared for the Project and the fire management plan (included as Appendix A-D to the NRMP). Existing regulations pertaining to these hazards, as well as their presence within the study area, are also detailed.

5.7.1 Regulatory Framework

5.7.1.1 Applicable Regulations

Numerous federal, state, and local laws and regulations pertaining to hazardous materials have been developed with the intent of protecting public health, the environment, surface water, and groundwater resources. Over the years, the laws and regulations have evolved to deal with different aspects of the handling, treatment, storage, and disposal of hazardous substances. Relevant laws and regulations include:

- Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980, also known as "Superfund," and the Superfund Amendments and Reauthorization Act (SARA) of 1986 (amended CERCLA, SARA Title III). CERCLA, SARA Title III provide a federal framework for setting priorities for cleanup of hazardous substances releases to air, water, and land. This framework provides for the regulation of the cleanup process, cost recovery, response planning, and communication standards.
- Federal Resource Conservation and Recovery Act (RCRA) of 1976. This act established the authority of the U.S. Environmental Protection Agency to develop regulations to track and control hazardous substances from their production, through their use, to their disposal.
- Title 40 Code of Federal Regulations (CFR), Part 257, establishes criteria for the classification
 of solid waste disposal facilities and practices (Sections 257.1 to 257.30). The U.S.
 Environmental Protection Agency has the authority under RCRA to authorize states to
 implement RCRA, and California is a RCRA authorized state. The City of San Diego's (City's)
 Local Enforcement Agency (LEA) regulates solid waste within the City, including waste
 collection/disposal, illegal solid waste dumping, and hazardous solid waste sites requiring
 remediation.

- The City's Municipal Code includes general hazardous materials regulations (Sections 42.0801, 42.0901, and 54.0701) as well as regulations regarding specific hazardous materials such as explosives (Section 55.3301).
- The California Health and Safety Code Chapter 6.8 (also known as the Presley-Tanner Hazardous Substance Account Act) provides the California Department of Toxic Substances Control (DTSC) authority for oversight of releases of hazardous substances that pose a threat to the public health or the environment.
- To minimize fire risk, the City's Municipal Code includes regulations pertaining to brush management (Section 142.0412), construction materials for development near open space (Chapter 14, Article 5), and adequate fire flow.

5.7.1.2 Emergency Preparedness

The County of San Diego Office of Emergency Services (OES) coordinates the overall County response to disasters. OES notifies appropriate agencies when a disaster occurs; coordinates responding agencies; ensures that resources are available and mobilized; plans for response to and recovery from disasters; and develops preparedness materials to the public. OES acts as staff to the Unified Disaster Council (UDC), a joint powers agreement among all 18 incorporated cities and the County of San Diego that provides for coordination of plans and programs countywide to ensure protection of life and property.

The Multi-Jurisdictional Hazard Mitigation Plan was developed with the participation of all jurisdictions in the County, including every incorporated City and the unincorporated County. The plan includes an overview of the risk assessment process, and identifies hazards present in the jurisdiction, hazard profiles, and vulnerability assessments. The plan identifies goals, objectives, and actions for each jurisdiction in the County.

5.7.2 Environmental Setting

5.7.2.1 Regulatory Database Listings

Appendix D to this EIR includes a review of regulatory agency databases, records review, limited visual site reconnaissance, and review of site history to identify potential Recognized Environmental Concerns (RECs). Regulatory agency databases and records were searched to identify sites within or near the study area that may pose a hazard to human health or the environment. The report identified the following sites within the study area that could pose a potential environmental or health concern, as detailed below.

- The Marine Corps Air Station (MCAS) Miramar, Camp Elliott Formerly Used Defense Site (FUDS) is a listed site due to the hazard associated with potential military munitions and UXO. Section 5.7.2.2 provides additional detail about the Camp Elliott FUDS.
- An AM/PM Mini Market located at 7255 Jackson Drive, adjacent to the study area, was identified in the GeoTracker database as an active Leaking Underground Storage Tank (LUST)

remediation site. This site was formerly an ARCO service station and is now used for parking by the adjacent library. The site was subject to remediation using soil vapor extraction and groundwater monitoring and assessment.

- The Alvarado Water Treatment (Filtration) Plant located at 5530 Kiowa Drive in the southern portion of the Lake Murray area was identified in the GeoTracker database as an active LUST site.
- The Sycamore Canyon Landfill, owned and operated by Allied Waste Systems is listed as an active LUST cleanup site in the East Elliott area. The landfill is a Class III, nonhazardous landfill that accepts non-hazardous, non-friable asbestos-containing materials.
- The RCRA database identified Fromex Photo Systems, an open hazardous waste cleanup site at 7299 Navajo Road. This site is located outside of the study area, west of the Lake Murray area. The identified hazard is associated with photo finishing chemicals.
- According to the Division of Oil, Gas, and Geothermal Resources of the California Department of Conservation, one "idle" oil and gas well was identified in proximity to the West Sycamore area, well #1, R.M. Cole Oil & Gas Syndicate.

5.7.2.2 Formerly Used Defense Sites

Use of military munitions in live-fire training and testing resulted in UXO in areas formerly used for military training activities within the study area, referred to as FUDS. The term UXO refers to explosive, propellant, or chemical-containing munitions that were armed or fired, and still remain unexploded. The study area is located partially within the Camp Elliott FUDS boundaries. The Camp Elliott FUDS is known or suspected to contain military munitions and explosives of concern. Because of the former Camp Elliott's size, the U.S. Army Corps of Engineers (USACE) has broken down the site into areas for purposes of site investigations and remediations (Figure 5.7-1).

These areas were identified by the study as Tierrasanta, Mission Trails, East Elliott, and Areas G, D, and H (see Figure 5.7-1). The portions of Camp Elliott located within the study area include Mission Trails, East Elliott, and Area G, which generally correspond to the West Sycamore, Mission Gorge, East Elliott, and Fortuna Mountain areas. The majority of munitions have been encountered within the Fortuna Mountain and East Elliott areas.

USACE has established programs to address the full range of UXO issues with public safety as a primary concern. The program is primarily achieved through education and outreach to inform military personnel and the public about the potential hazards associated with UXO. USACE monitors an inventory of reporting information for UXO materials within FUDS areas and implements a "Public Involvement Plan" and "Five-Year Recurring Reviews."

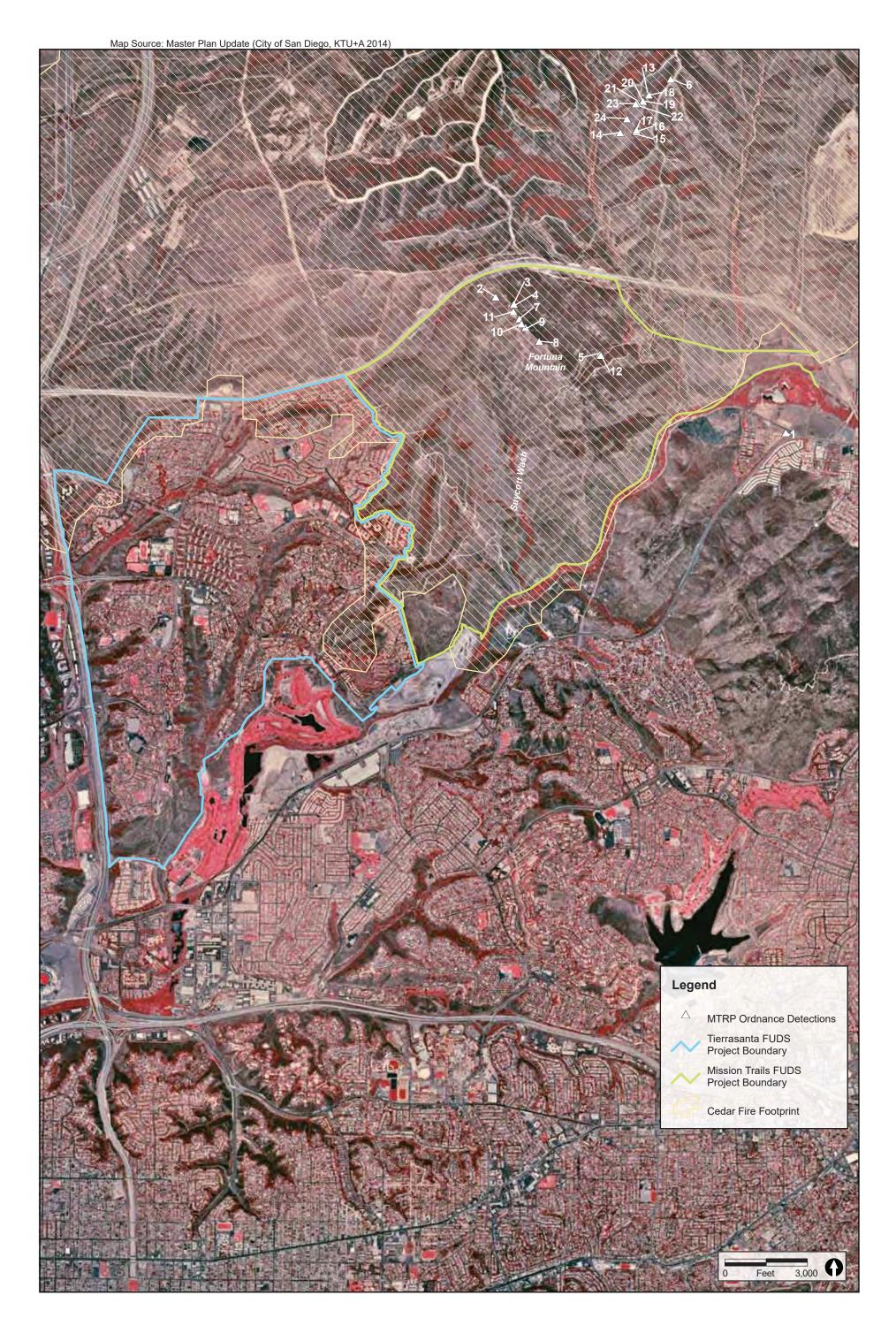


FIGURE 5.7-1 Cedar Fire Footprint and Ordnance Detection Sites

5.7.2.3 Wildfire Hazards

Due to the amount of natural, unmaintained open space characteristic of the study area and the proximity to urban areas, the area poses a high risk for wildfires. Dominant vegetation types within the study area include chaparral, coastal sage scrub, and grassland, all of which are highly combustible. There have been 12 fires within the study area since 1939 (Figure 5.7-2). In addition, an approximately 100-acre wildfire occurred within the Mission Gorge area along the Kwaay Paay Mountain in July 2014.

Wildfire hazards are particularly sensitive in the grass- and brush-covered hillsides that border metropolitan areas, such as the study area. The degree of fire hazard depends on climate, vegetation, and physical conditions. According to California Department of Forestry and Fire (CAL FIRE), a majority of the study area is designated as a Very High Fire Hazard Severity Zone (VHFHSZ), with the exception of the eastern portion within the Lake Murray area.

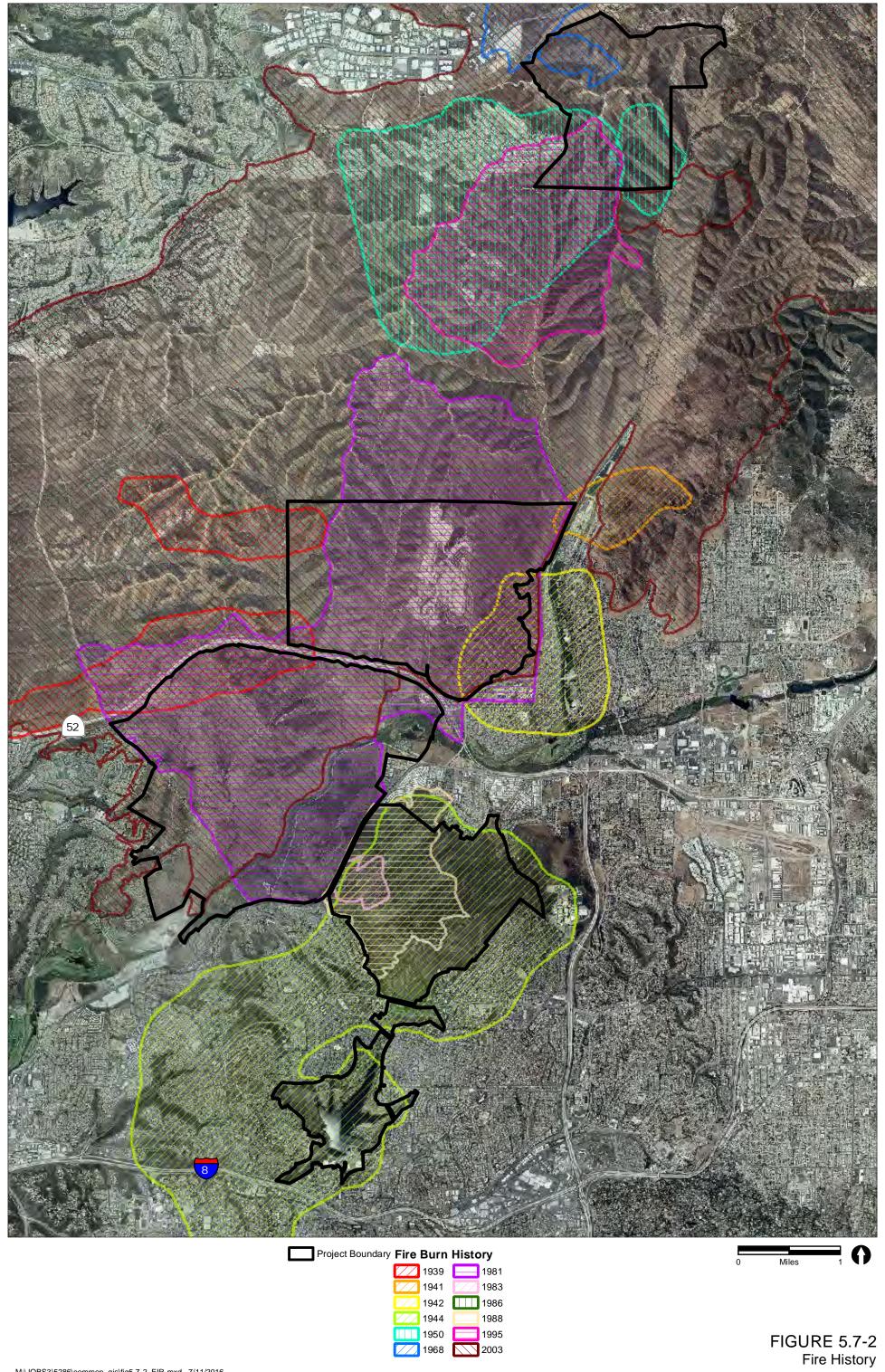
5.7.2.4 Aircraft Hazards

The state requires that the San Diego County Regional Airport Authority Board, as the Airport Land Use Commission (ALUC), prepare an Airport Land Use Compatibility Plan (ALUCP) for each public-use airport and military air installation in San Diego County. An ALUCP contains policies and criteria that address compatibility between airports and future land uses that surround them by addressing noise, over flight, safety, and airspace protection concerns to minimize the public's exposure to noise and safety hazards within the airport influence area for each airport. The study area is outside of the airport influence area of any public airports and military air installations. The nearest airports are Montgomery Field, located approximately 3 miles west of the Mission Gorge area and MCAS Miramar Air Field, located approximately 4 miles west of the East Elliott area.

5.7.3 Significance Determination Thresholds

Based on the City's 2016 Significance Determination Thresholds, which have been adapted to guide a programmatic analysis of the proposed Plans and associated discretionary actions, a significant health and safety impact would occur if implementation of the Plans and associated discretionary actions would:

- 1. Expose people or property to health hazards, including wildfire hazards;
- Create future risk of an explosion or the release of hazardous materials (including, but not limited to, gas, oil, pesticides, chemicals, or radiation) or expose people or the environment to a significant hazard through the routine transport, use, or disposal of hazardous materials; or
- 3. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or environment.



5.7.4 Impact Analysis

Issue 1: Health and Safety Hazards

Would implementation of the Plans and associated discretionary actions expose people or property to health hazards, including wildfire hazards?

Based on the City's Significance Determination Thresholds, impacts related to health hazards, including fire, would be significant if implementation of the Plans would:

- 1. Expose people or structures to significant risk involving wildland fires; or
- 2. Impair implementation of an emergency response plan.

Management actions identified in the NRMP, such as hand weeding, erosion control, and exclusionary fencing, would not expose people or structures to wildfire hazards and would not impair implementation of emergency response plans. No impact would occur. The MPU is analyzed below.

It should be noted that potential health hazards associated with the use, disposal, release, or transport of hazardous materials; and/or exposure to sites containing hazardous materials are addressed under Issue 3, below. Heath hazards related to exposure to air contaminants are discussed in Section 5.3, Air Quality, of this EIR.

Recreational users of the Park are currently exposed to potential wildfire hazards. Park rangers, along with the San Diego Fire Department (SDFD), San Diego Police Department (SDPD), and other jurisdictions work cooperatively in order to evacuate areas of the Park if a brush fire occurs. The access points near any areas where a wildfire is burning are closed off. In addition, the Park's existing programming sets forth educational material to Park users that wildfires are most likely to occur during late summer and fall, when vegetation is extremely dry, and Santa Ana conditions occur.

Multiple MPU Recommendations generally intend to strengthen emergency response actions and minimize fire risk within the Park. For example, Park-wide Management Recommendation 8 would implement an emergency response plan for the Park in collaboration with the SDFD and SDPD. Park-wide Facility Recommendation 13 would continue to prohibit fires within the Park to reduce fire danger, except within developed fire rings at the Kumeyaay Lake Campground, the East Fortuna Staging Area, and Lake Murray. Park-wide Facility Recommendation 16 states to conduct brush management in the brush management zone around all habitable structures within the Park in accordance with City brush management regulations.

In addition, one of the overall goals of the MPU is to continue to provide programs and interpretive signage to educate the public about the resources within the Park. Education on the role of wildfires in the region and the associated hazards to life and property would continue to be addressed within the Park's educational programming.

With regards to wildfire hazards, various MPU recommendations contemplate subsequent projects such as trail construction, restoration, restrooms, park benches, shade structures, and offices for Park rangers. As previously detailed, the study area is located within a very high FHSZ. Wildfire events could expose both users of the Park and structures within the Park to risk from wildfire. While it is not expected that the structures contemplated by the MPU would necessarily increase the risk of wildfire within the study area, they would represent a new—albeit somewhat minor—source of combustible material within the Park. Therefore, impacts associated with the exposure of structures to wildfire hazards would be significant (**Impact HAZ-1**), and mitigation is required.

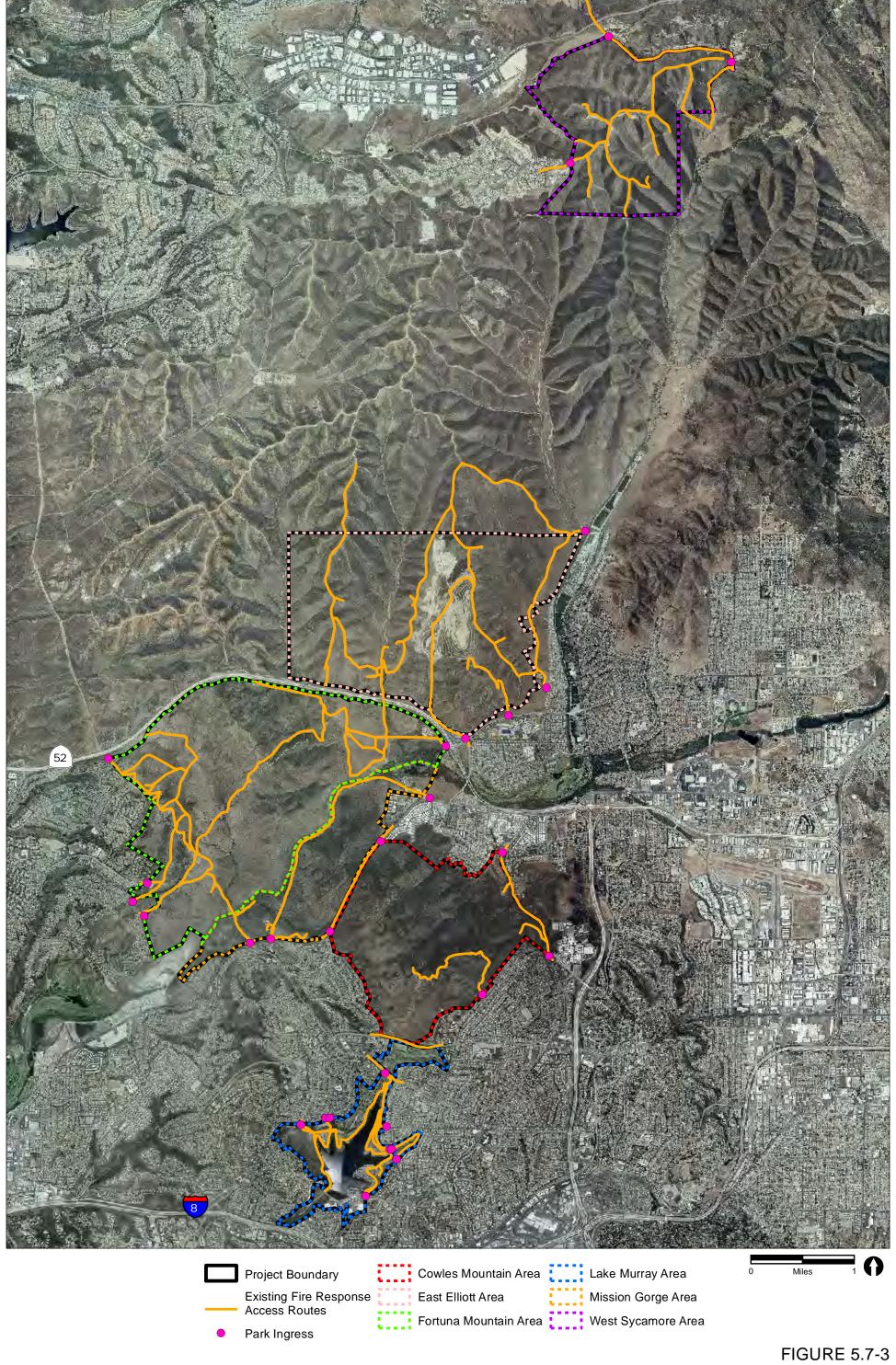
With regards to emergency response plans, subsequent projects contemplated by the MPU-Plans such as new trail construction, restoration, park benches, and shade structures would not have the potential to hinder implementation of such plans. These types of amenities would not impede travel of vehicles on roads or movement of people. In addition, there are numerous access routes providing ingress and egress into the Park, including paved and unpaved roads, as well as disturbed vegetation for overland travel (Figure 5.7-3). None of the MPU recommendations would impede use of these existing access routes. Therefore, impacts associated with impairment of an emergency response plan are considered less than significant.

Issue 2: Hazardous Substances

Would implementation of the Plans and associated discretionary actions create future risk of an explosion or the release of <u>a</u>hazardous substance (including, but not limited to gas, oil, pesticides, chemicals, or radiation)? Would the Plans expose people or the environment to a significant hazard through the routine transport, use, or disposal of hazardous materials?

Management actions identified in the NRMP, such as hand weeding, erosion control, and exclusionary fencing, would not expose people or structures to wildfire hazards and would not impair implementation of emergency response plans. No impact would occur. The MPU is analyzed below.

MPU recommendations contemplate subsequent projects such as trails, parking areas, shade structures, benches, and restrooms. Future ground disturbance and grading activities for these projects would potentially encounter hazardous substances below ground. No addition of storage of explosive or hazardous substances is anticipated, with exception of development within the boundaries of former MCAS Miramar Camp Elliott. The USACE has established the Public Involvement Plan and Five-Year Recurring Reviews to monitor UXO materials. The long-term monitoring plan addresses UXO issues, provides public outreach and education, and minimizes health hazards to the public.



Based on the existing regulatory requirements in place to address hazardous material releases and emergency responses, implementation of subsequent projects contemplated by the MPU-Plans are not expected to result in a release of hazardous materials into the environment. In addition, these subsequent projects would be required to comply with applicable federal, state, and local regulations related to the accidental release of hazardous materials. Compliance with such regulations would minimize the potential for a release and provide planning mechanisms for prompt and effective cleanup in the event known or unknown subsurface hazardous materials are encountered. Due to required compliance with existing regulations, impacts related to an accidental hazardous materials release would be less than significant.

Issue 3: Hazardous Sites

Would implementation of the Plans and associated discretionary actions 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?

a. Formerly Used Defense Sites

The former Camp Elliott munitions training site, or FUDS, was identified in the record search of hazardous materials sites as being a source of contamination related to potential military munitions and UXO. The Camp Elliott FUDS is known or suspected to contain UXO and therefore may present an explosive hazard during implementation of subsequent projects contemplated by the MPUPlans. The portions of Camp Elliott located within the study area correspond with the West Sycamore, Mission Gorge, East Elliott, and Fortuna Mountain areas. There were 23 detected ordnance locations in the Fortuna Mountain and East Elliott areas, where most of the UXOs have been uncovered (see Figure 5.7-1).

UXO is often found in a variety of shapes and sizes and can look like a pointed pipe, soda can, baseball, or muffler. These items can be encountered when conducting ground-disturbing activities such as grading or fence installations. Any subsequent projects contemplated by the Plans that involve ground disturbing activities within the former Camp Elliott areas have the potential to expose people to significant health hazards related to UXO.

For example, several MPU recommendations within the Fortuna Mountain area contemplate localized improvements or rerouting sections of trails. Rerouting trails may be associated with land disturbance in areas with buried or uncovered UXO, which would represent a potential hazard to human health during implementation of these subsequent projects.

In the East Elliott area, numerous management actions contemplated by the NRMP would involve biological resource mapping and surveys or conducting habitat restoration and revegetation within disturbed areas. These activities could present a human health hazard due to disturbance and activity within areas with potential UXO.

USACE is responsible for monitoring and inventorying information related to the presence of UXO materials within the Camp Elliott FUDS area. USACE is implementing a long-term monitoring program and a Public Involvement Plan with five-year recurring reviews to address UXO issues.

These provide public outreach and education to inform personnel about the potential hazards associated with UXOs. Field safety warnings, emergency communications, instituting "Munitions and Explosives of Concern" warning signs, and circulating documents are used to educate and disseminate information about UXO hazards.

Implementation of these USACE programs has served to reduce the risk of hazards to the public and would continue to be implemented within the study area on a long-term basis pursuant to USACE regulations. USACE has initiated investigations at the Camp Elliott FUDS sites; however, the area currently represents an ongoing hazard due to the potential presence of UXO. As a result, subsequent projects contemplated by the Plans could expose people to hazards associated with UXO. Impacts would be significant (Impact HAZ-2) and mitigation is required.

b. Other Hazardous Material Sites

Some subsequent projects contemplated by the Plans would involve ground disturbance or grading, which could potentially disrupt hazardous substances below ground due to the presence of contaminated sites identified within or near the study area. The records search and site reconnaissance completed by GHD (2016a) found several hazardous materials listings within or near the study area. Several active LUST sites were identified in addition to one hazardous waste handler listed in the RCRA database. One of the active LUST sites was identified as a former AM/PM market, located at the corner of Golfcrest and Jackson Drive, approximately one-eighth of a mile west of the northern Lake Murray area. This site is not expected to present a potential hazard associated with subsequent projects contemplated by the MPU-Plans due to its offsite location, the fact that it is currently used as a parking area for the adjacent San Carlos library, and because remediation of the site is complete according to the Geotracker listing.

The Alvarado Water Treatment Plant LUST listing is not expected to present a potential hazard associated with subsequent projects contemplated by the Plans, due to its location entirely within the Alvarado Treatment Plant site, where no subsequent projects have been proposed. The site listed on the RCRA listing would also not be disturbed due to its location at 7299 Navajo Road, outside of the study area. The two other LUST sites identified as MCAS Miramar, Camp Elliott (East and MCAS Miramar), and Camp Elliott (Mission Trails area) are listed due to the presence of military munitions.

The Sycamore Landfill, located within the East Elliott area, is also listed as a LUST clean-up site. Several MPU recommendations for the East Elliott area include working with the owners of the landfill to develop trails adjacent and on landfill property (see Recommendations EE-R23 and EE-R40 on Figure 3-7). Additionally, Recommendation EE-F4 would entail collaborating with the owners of the landfill to repurpose their administrative facilities and associated parking proposed just south of the landfill once the landfill closes as the primary entry point and staging area for East Elliot. The City LEA enforces regulations for the safe and proper handling of solid waste at landfills. Potential hazardous site impacts associated with the landfill from implementation of MPU recommendations are not expected due to the required regulatory oversight associated with landfill operations. Any activities on or near the landfill would occur in conjunction with the property owners and regulatory authorities including the LEA and the Department of Resources Recycling and Recovery (CalRecycle).

In addition, any subsequent projects contemplated by the Plans located on or near the landfill would not require disturbance that could result in methane release.

Although none of the sites identified through the regulatory databases are expected to present a human or environmental health hazard due to subsequent projects contemplated by the Plans, unknown or buried hazardous substances could be encountered during ground-disturbing activities. If proper procedures are not followed in the event hazardous materials are encountered, these materials could be released into the environment and result in potential human health and environmental impacts. Therefore, impacts would be significant (Impact HAZ-3) and mitigation is required.

5.7.5 Significance of Impacts

Issue 1: Health and Safety Hazards

MPU recommendations would generally serve to further educate Park users about wildfire risks within the Park, and would not alter or significantly increase the potential exposure of recreational users of the Park. Other MPU recommendations contemplate subsequent projects, such as offices for Park rangers, shade structures, and picnic areas. While these facilities would not represent a significant amount of habitable structures, they nevertheless would be subject to wildfire damage. Therefore, impacts associated with the exposure of structures to wildfire hazards would be significant (Impact HAZ-1), and mitigation is required.

Subsequent projects contemplated by the <u>MPU-Plans</u> would not interfere with emergency response plans, and evacuation routes within the Park would generally improve over time as these projects are implemented. Impacts would be less than significant.

Issue 2: Hazardous Substances

Future projects implemented in accordance with the Plans would be subject to applicable federal, state, and local regulations related to the hazardous materials. When future projects are implemented, any applicable requirements of the City's Municipal Code related to minimizing potential impacts from hazardous materials, as well as any regulations imposed by federal, state, and other local agencies would be disclosed as part of the discretionary review process for subsequent projects. Therefore, impacts would be less than significant.

Issue 3: Hazardous Sites

The study area currently represents an ongoing hazard due to the potential presence of UXO. As a result, subsequent projects contemplated by the Plans could expose people to hazards associated with UXO. Impacts would be significant (Impact HAZ-2) and mitigation is required.

The presence of other sites compiled pursuant to Government Code Section 65962.5 would result in potentially significant human health and environmental hazard impacts associated with implementation of subsequent projects contemplated by the Plans. Impacts would be significant (Impact HAZ-3) and mitigation is required.

5.7.6 Mitigation Framework

Adherence to the Mitigation Framework below would minimize impacts related to potential wildfire hazards (Impact HAZ-1).

MM-HAZ-1: Specific regulations associated with fire prevention are provided in Section 55.0101 (Adoption of the California Fire Code), Section 55.0901 (Fire Department Access and Water Supply), and Section 55.1001 (Fire Protection Systems and Equipment) of the Municipal Code.

The Municipal Code provides fire safety regulations in Municipal Code Section 142.0412 (Brush Management Regulations). Individual projects implemented pursuant to the Master Plan would be required to demonstrate compliance with applicable fire codes and would be required to implement applicable Brush Management Regulations under Section 142.0412 of the Municipal Code. These regulations include the following:

- Brush management is required in all base zones on publicly or privately-owned premises that are within 100 feet of a structure and contain native or naturalized vegetation.
- Brush management activity is permitted within Environmentally Sensitive Lands (ESL; except for wetlands) that are located within 100 feet of an existing structure in accordance with Section 143.0110(c)(7). Brush management in wetlands shall be requested with a development permit in accordance with Section 143.0110 where the Fire Chief deems brush management necessary in accordance with Section 142.0412(i). Where brush management in wetlands is deemed necessary by the Fire Chief, that brush management shall not qualify for an exemption under ESL Regulations, Section 143.0110(c)(7).
- Brush Management Zones. Where brush management is required, a
 comprehensive program shall be implemented that reduces fire hazards around
 structures by providing an effective fire break between all structures and
 contiguous areas of native or naturalized vegetation. This fire break shall consist
 of two distinct brush management areas called "Zone One" and "Zone Two."
- Brush Management Zone Two is the area between Zone One and any area of native or naturalized vegetation and typically consists of thinned, native, or naturalized non-irrigated vegetation.
- Brush management activities are prohibited within coastal sage scrub, maritime succulent scrub, and coastal sage-chaparral habitats from March 1 through August 15 (bird nesting season), except where documented to the satisfaction of the City Manager that the thinning would be consistent with conditions of species coverage described in the Multiple Species Conservation Program Subarea Plan.

The following Mitigation Framework includes standard requirements and procedures that shall be implemented to ensure the proper handling of the removal of UXO (Impact HAZ-2):

MM-HAZ-2:

Prior to initiating subsequent projects contemplated by the Plans that could involve subsurface disturbance within the former Camp Elliott FUDS, the City shall verify that the USACE has completed subsurface UXO clearance of the entire site, or a Remedial Action Work Plan (RAWP) shall be prepared and implemented in accordance with requirements and procedures of the DTSC, in consultation with the USACE.

The RAWP, including a Health and Safety Plan, shall be prepared prior to grading or ground disturbance in accordance with requirements and procedures of the DTSC. The RAWP shall thoroughly describe investigations and disposal activities. The draft RAWP shall be reviewed and approved by City LEA staff and the DTSC, in consultation with the USACE.

At a minimum, the RAWP shall include the following performance criteria:

- Prior to initiation of UXO clearance activities all Park personnel and adjacent property owners shall be notified.
- Implementation of the RAWP shall be performed by a qualified contractor.
- Access into the work sites shall be limited to the contractor personnel specifically authorized to enter the work site.
- Prior to initiation of detonation operations, all nonessential personnel shall be evacuated to a distance outside the fragmentation zone of the UXO to be detonated; radio communication shall be maintained between all concerned parties.
- Where detonation activities in proximity to schools are needed, they shall occur outside of typical school hours, as feasible.
- Affected areas shall be secured prior to authorizing detonation of explosive charges. Signs shall be posted announcing blasting danger and guards shall be stationed at all likely pedestrian/recreational user entrances.
- When a detonation-in-place is to occur, contractor personnel shall be posted in a 360-degree radius around the detonation site, at a safe distance.
- No disposal procedures shall be applied until the item has been positively identified. After the inspection has been completed, and providing there are no residual hazards, the UXO Senior Supervisor shall authorize the resumption of site operations. In the event that an UXO cannot be destroyed on-site, or if an unidentified UXO is located, the Safety Representative shall be notified for appropriate assistance.

The RAWP shall detail the environmental investigations and define the procedures for disposing of UXO determined unsafe to move or handle (e.g., detonation-in-place disposal). Also to be included as part of the RAWP is an Explosive Safety Submission report that outlines the safety aspects associated with investigating and removing UXO. The potential for encountering UXO during the removal action poses a risk to on-site workers, nearby populations, and the environment. The Health and Safety Plan is an integral component of the RAWP and shall include safety precautions that all personnel must adhere to during implementation of the work plan. Violation of UXO-related safety precautions shall be grounds of dismissal.

The Health and Safety Plan shall also provide instructions for workers on standard work practices, hazard communication, identification, handling, removal, transportation, and detonation. These precautions may include, but are not limited to, the following:

- Prior to detonation of an UXO, sandbags filled with construction grade sand shall be utilized to tamp the detonation and minimize damage to nearby trees and shrubs. The preparation shall be thoroughly soaked with water and the immediate area watered well to minimize the possibility of secondary fires.
- Carry blasting caps in approved containers, and keep them out of the direct rays
 of the sun.
- Do not use explosives or accessory equipment that are obviously deteriorated or damaged. They may detonate prematurely or fail completely.
- Disposal operations shall not be initiated until at least one-half hour after sunrise and shall be concluded by at least one-half hour prior to sunset.
- Restrict and control access to the disposal site to a minimum of authorized personnel necessary for safe conduct of the disposal operations.
- Do not carry fire- or spark-producing devices into a disposal site except as specifically authorized.

The procedure for completing subsurface investigations and clearance is described below:

- The project site shall be surveyed and marked out in 100-by-100-square-foot grids.
- A Schonstedt detector shall be used to locate surface and subsurface anomalies.
- Motor vehicles shall be restricted to existing, actively used roads, during normal operations.
- Personnel shall drive as near as practical to the work site and walk into and out of the grid(s).

 In the event of a medical or fire emergency, vehicles shall be utilized wherever necessary.

Depending on the terrain at the project location, different sweep techniques shall be used. Varying sweep line intervals may be required. If the terrain is too steep to sweep safely, that portion of the grid not swept shall be mapped; and it would become the team leader's responsibility to devise the clearance method(s) suitable to the specific grid to assure complete clearance.

During the removal, all personnel shall receive highly specialized training. Personnel shall be briefed of safety regulations every day. Hazards of unexploded munitions shall be explained at each briefing, including other risks, such as those posed by rattlesnakes and poison oak, etc. Should UXO items be discovered during removal actions, proper procedures (as detailed in the RAWP) shall be followed to ensure safe disposal. For example, a metal containment system may be placed around the item and then detonated by remote control from a safe distance.

All UXO shall undergo an initial assessment to identify the ordnance. No disposal procedures shall be applied until the item has been positively identified. In the event that an UXO cannot be destroyed on-site, or if an unidentified UXO is located, a Safety Representative shall be notified for appropriate assistance in accordance with applicable regulations.

The following Mitigation Framework includes standard requirements and procedures that shall be implemented to minimize risk to human health and the environment (Impact HAZ-3):

MM-HAZ-3:

Subsequent projects contemplated by the Plans that involve ground disturbance may occur in areas of known environmental concern such as LUST sites or other potentially contaminated sites. Regulations within the Municipal Code require that future projects shall demonstrate that the site is suitable for the proposed use. For sites with recorded hazardous material concerns, the City or project applicant shall obtain confirmation from the County Department of Environmental Health (DEH) that the site has been remediated to the extent required for the proposed use. Clearance may be provided by County DEH when no hazardous materials are known, or expected to be present, or when remediation is required to be completed prior to clearance. Only upon receipt of DEH clearance would projects be recommended for approval.

5.7.7 Significance after Mitigation

Issue 1: Health and Safety Hazards

Although implementation of the Plans and associated discretionary actions would have the potential to result in significant impacts related to wildfire hazards, subsequent projects would be required to implement the Mitigation Framework (**MM-HAZ-1**) prior to implementation. The Mitigation

Framework requires site-specific environmental review, analysis of potential impacts, and recommendations for mitigation to reduce significant impacts to below a level of significance.

Issue 2: Hazardous Substances

Impacts related to hazardous substance release would be less than significant. No mitigation is required.

Issue 3: Hazardous Sites

Subsequent projects implemented in accordance with the Plans would be required to implement mitigation measures **MM-HAZ-2** and **MM-HAZ-3**. Compliance with these requirements and consultation with the appropriate regulatory agencies to verify that health risk has been remediated in accordance with all applicable local, state, and federal regulations will reduce potential hazards to below a level of significance.

5.8 Hydrology and Water Quality

This section addresses the potential hydrology and water quality impacts that would result from the Project and sets forth a mitigation framework that would reduce such impacts where applicable. It relies on a water quality study prepared for the Project (Appendix E) in addition to secondary source information and recommendations contained within the Master Plan Update (MPU) and Natural Resources Management Plan (NRMP) (collectively, the Plans for the Mission Trails Regional Park Park. This section also details applicable regulations, receiving waters, flood hazards, and other relevant existing conditions within the study area.

5.8.1 Regulatory Framework

Various federal, state, and local regulations impose requirements on new development for erosion control, control of runoff contaminants, and control of direct discharge of water quality pollutants. These requirements are summarized below.

5.8.1.1 Federal

a. Clean Water Act

The Clean Water Act is the primary federal law that protects the nation's waters, including lakes, rivers, aquifers, and coastal areas. It established basic guidelines for regulating discharges of pollutants into the waters of the U.S. and requires that states adopt water quality standards to protect public health and enhance the quality of water resources.

Section 401 of the Clean Water Act requires that an applicant for a federal permit to conduct any activity, including the construction or operation of a facility which may result in the discharge of pollutants to waters of the U.S., must obtain certification from the state. Section 402 of the Clean Water Act established the National Pollutant Discharge Elimination System (NPDES) to regulate the discharge of pollutants from point sources, and Section 404 established a permit program to regulate the discharge of dredged material into waters of the U.S. Implementation of the Clean Water Act is the responsibility of the U.S. Environmental Protection Agency, which has delegated much of that authority to U.S. Army Corps of Engineers (USACE), as well as state and regional agencies.

The Section 303(d) process of the Clean Water Act requires states to identify surface waters that have been impaired. Under Section 303(d), states, territories, and authorized tribes are required to develop a list of water quality segments that do not meet water quality standards, even after point sources of pollution have installed the minimum required levels of pollution control technology.

b. Federal Emergency Management Agency Flooding Regulations

The National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973 made the purchase of flood insurance mandatory for the protection of property located in Special Flood Hazard Areas (SFHAs). The Federal Emergency Management Agency (FEMA) provides subsidized flood insurance to communities that comply with FEMA regulations. The SFHAs and other risk premium zones applicable to each participating community are depicted on Flood Insurance Rate Maps (FIRMs). Sections 143.0145 and 143.0146 of the City of San Diego's (City's) Municipal Code contain updated development regulations within SFHAs.

c. Executive Order 11988

Executive Order 11988 (Floodplain Management) addresses floodplain issues related to public safety, conservation, and economics. It requires federal agencies that intend to construct, permit, or fund projects within floodplains to:

- Avoid incompatible floodplain development
- Be consistent with the standards and criteria of the National Flood Insurance Program
- Restore and preserve natural and beneficial floodplain values

d. Executive Order 11990

Executive Order 11990 (Protection of Wetlands) requires each federal agency, if financing, undertaking, or assisting in construction or improvements, to provide leadership and to take action to minimize the destruction, loss, or degradation of wetlands, and to preserve and enhance the natural and beneficial values of wetlands in carrying out the agency's responsibilities for acquiring, managing, and disposing of federal lands and facilities. Federal agencies must do so when conducting federal activities and programs affecting land use, including but not limited to water and related land resources planning, regulation, and licensing activities.

5.8.1.2 State

a. Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act established the principal California legal and regulatory framework for water quality control. The Porter-Cologne Water Quality Control Act is embodied in the California Water Code. The California Water Code authorizes the State Water Resources Control Board (SWRCB) to implement the provisions of the federal Clean Water Act. The state of California is divided into nine regions governed by Regional Water Quality Control Boards (RWQCBs). The RWQCBs implement and enforce provisions of the California Water Code and the Clean Water Act under the oversight of the SWRCB.

The City is located within the purview of the San Diego RWQCB (Region 9). The Porter-Cologne Act also provides for the development and periodic review of Water Quality Control Plans (Basin Plans) that designate beneficial uses of California's major rivers and groundwater basins and establish

water quality objectives for those waters. The previously detailed 303(d) list is also updated by the RWQCB and SWRCB biannually.

b. California Department of Fish and Wildlife-Streambed Alteration

The California Department of Fish and Wildlife (CDFW) is responsible for protecting, conserving, and managing wildlife, plant, fish, and riparian resources in the state of California. Under Sections 1600–1607 of the Code, CDFW regulates activities that would divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake that supports fish or wildlife. CDFW has jurisdiction over riparian habitats (e.g., southern willow scrub) associated with watercourses. CDFW jurisdictional resources are delineated by the outer edge of riparian vegetation or at the top of the bank of streams or lakes, whichever is wider. A Streambed Alteration Agreement would be required for a project that impacts certain CDFW jurisdictional resources. Such an agreement with CDFW would most likely require mitigation in the form of on-site, off-site, or in-lieu fee mitigation, or combination of all.

c. San Diego Regional Water Quality Control Board (San Diego RWQCB) Order No. R9-2013-0001, as amended by Order No. R9-2015-0001 and Order No. R9-2015-0100, NPDES Permit No. CAS0109266

The San Diego RWQCB adopted Order No. R9-2013-0001, NPDES No. CAS0109266, National Pollutant Discharge Elimination System Permit and Waste Discharge Requirements for Discharges from the Municipal Separate Storm Sewer Systems (MS4s) draining the Watersheds within the San Diego Region. Under the authority of the Clean Water Act amendments and federal NPDES Permit regulations, the San Diego RWQCB issued this order to the Copermittees consisting of San Diego County, the 18 cities within San Diego County, the Port of San Diego, and the San Diego Regional Airport Authority. Also known as the MS4 permit, this order requires that all jurisdictions within the San Diego region prepare Jurisdictional Runoff Management Plans (JRMPs). Each of these jurisdictional plans must contain a component addressing construction activities and a component addressing existing development. The subsequent amendments expanded coverage to portions of Orange County and Riverside County within the San Diego Region (Region 9) and made other modifications.

5.8.1.3 Local

a. Water Quality Control Plan for the San Diego Basin

The San Diego Basin encompasses approximately 3,900 square miles, including most of San Diego County and portions of southwestern Riverside and Orange counties. The basin is composed of 11 major Hydrological Units (HUs), 54 Hydrological Areas (HAs), and 147 Hydrologic Subareas (HSAs), extending from Laguna Beach southerly to the United States-Mexico border. Drainage from higher elevations in the east flows to the west, ultimately into the Pacific Ocean. The Basin Plan defines existing and potential beneficial uses and water quality objectives for coastal waters, groundwater, surface waters, imported surface waters, and reclaimed waters in the basin. Water quality objectives seek to protect the most sensitive of the beneficial uses designated for a specific water body.

Beneficial uses are defined as: "the uses of water necessary for the survival or well-being of man, plants and wildlife. These uses of water serve to promote the tangible and intangible economic, social and environmental goals of mankind" (RWQCB 2011).

b. City of San Diego Jurisdictional Runoff Management Plan

The City has updated its JRMP to conform with the requirements of the current MS4 Permit. The City's JRMP encompasses City-wide programs and activities designed to prevent and reduce storm water pollution within City boundaries. The JRMP is a total account of how the City plans to protect and improve the water quality of rivers, bays, and the ocean in the region in compliance with the MS4 permit. The document describes how the City incorporates storm water best management practices (BMPs) into land use planning, development review and permitting, City capital improvement program project planning and design, and the execution of construction contracts.

c. Water Quality Improvement Plans

The MS4 Permit requires development of Water Quality Improvement Plans (WQIPs) that guide the Copermittees' jurisdictional runoff management programs towards achieving improved water quality in MS4 discharges and receiving waters. The WQIPs further the Clean Water Act's objectives to protect, preserve, enhance, and restore the water quality and designated beneficial uses of waters of the state. The requirement sets forth a collaborative and adaptive planning and management process that identifies the highest priority water quality conditions within a watershed management area and implements strategies through implementation of the JRMPs of the respective jurisdictions (San Diego RWQCB 2013). Most of Park is within the San Diego River Watershed Management Area WQIP, but a portion of the West Sycamore area is within the Los Peñasquitos Watershed Management Area WQIP.

d. Storm Water Management and Discharge Control Regulations (Land Development Code Section 43.0301, et seq.)

The purpose of these regulations are to further ensure the health, safety, and general welfare of the citizens of the City by effectively prohibiting non-storm water discharges, including spills, dumping, and disposal of materials other than storm water to the MS4, and by reducing pollutants in discharges from the MS4 to receiving waters to the maximum extent practicable, in a manner pursuant to and consistent with the federal Water Pollution Control Act (Clean Water Act, 33 United States Code Section 1251 et seq.) and the MS4 permit.

e. Local Drainage Design Manual

Chapter 14, Article 2, Division 2 of the Municipal Code outlines storm water runoff and drainage regulations which apply to all development in the City, regardless of whether or not a development permit or other approval is required. In addition, drainage design policies and procedures are provided in the City's Drainage Design Manual (which is incorporated in the Land Development Manual as Appendix B). The Drainage Design Manual provides a guide for designing drainage and drainage-related facilities for developments within the City. The Drainage Design Manual requires projects to coordinate proposed designs with existing structures and systems handling the same

flows to ensure that new projects would not result in any increased runoff or generate increased sediment or pollutants.

f. Storm Water Standards Manual

The City's Storm Water Standards Manual was updated in January 2016 to reflect the requirements of the updated MS4 permit (City of San Diego 2016). The manual addresses, and provides guidance for complying with, updated on-site post-construction storm water requirements for Standard Projects and Priority Development Projects (PDPs), and provides updated procedures for planning, preliminary design, selection, and design of permanent storm water BMPs based on the performance standards presented in the MS4 Permit. Primary elements of the Storm Water Standards Manual include:

- Low Impact Development (LID) BMP Requirements and performance standards
- Source control and site design BMPs
- BMPs applicable to individual PDP categories
- Storm water pollutant control standards
- Hydromodification Management BMPs

The purpose of hydromodification management requirements for PDPs is to minimize the potential of storm water discharges from the MS4 from causing altered flow regimes and excessive downstream erosion in receiving waters. Hydromodification management implementation for PDPs includes two components: protection of critical coarse sediment yield areas and flow control for post-project runoff from the project site. Future development projects proposed within areas discharging into underground storm drains discharging directly to bays or the ocean are exempt from hydromodification management requirements.

g. Municipal Code – Environmentally Sensitive Lands Regulations, Special Flood Hazard Areas

Chapter 14, Article 3 of the Land Development Code (LDC) contains the Environmentally Sensitive Lands (ESL) Regulations, which are intended to "protect, preserve and where damaged restore the environmentally sensitive lands of the City and the viability of the species supported by those lands." ESL Regulations apply to all proposed development when environmentally sensitive lands are present, including development within SFHAs as defined by FIRMs published by FEMA. The San Diego River is considered a SFHA and is subject to development regulations for SFHA's specified in Municipal Code Section 143.0145. The development regulations and all other applicable requirements and regulations of FEMA apply to all development proposing to encroach into a SFHA, including both the floodway and flood fringe areas.

5.8.2 Environmental Setting

5.8.2.1 Watershed Management Areas, Hydrologic Units, Hydrologic Areas, and Hydrologic Subareas

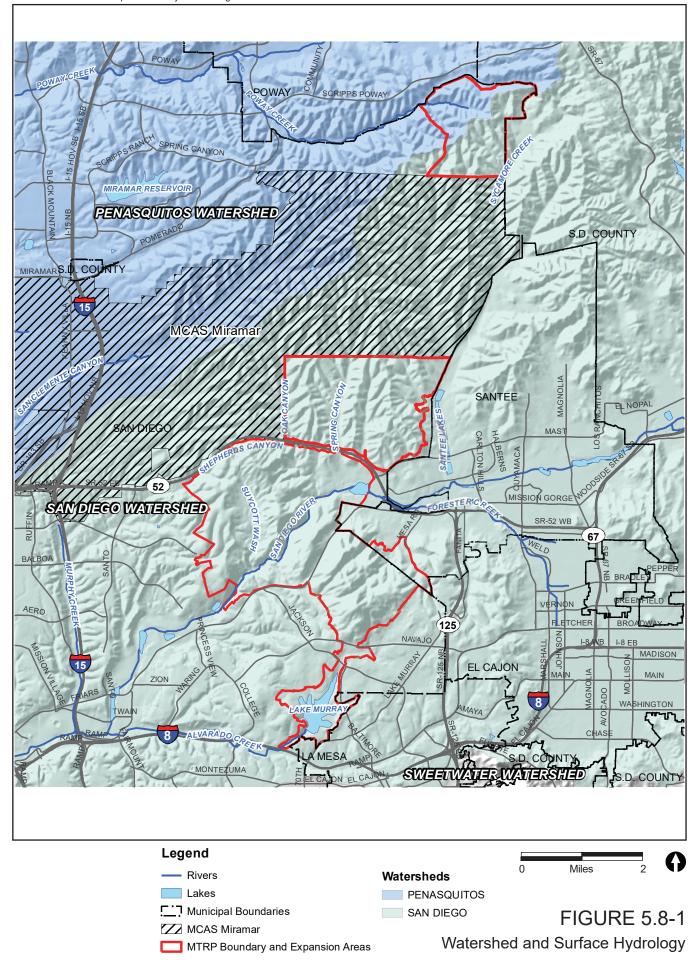
The study area is located within two major watersheds: San Diego River and Los Peñasquitos Creek. A majority of the study area drains to receiving waters within the San Diego River, while the northern half of the West Sycamore area drains to the Los Peñasquitos Creek watershed. As previously detailed, the Basin Plan (prepared by the San Diego RWQCB) identifies the water quality objectives for waters in the basin and subdivides it into: HUs (the entire watershed of one or more major streams), HAs (watersheds of major tributaries and/or major groundwater basins within an HU), and HSAs (major subdivisions of hydrologic areas including both water-bearing and non-water-bearing formations.

As shown in Figure 5.8-1, the majority of the study area is located within the San Diego HU (907.00), Lower San Diego HA (907.10), Mission San Diego HSA (907.11), and Santee HSA (907.12). The northern half of the West Sycamore area is located within the Peñasquitos HU (906.00) and Poway HA (906.20). The Peñasquitos HU does not have a HSA. The characteristics of these HUs are described further below.

The San Diego HU is described by the Basin Plan as a long, triangular-shaped area of about 440 square miles drained by the San Diego River. The El Capitan, San Vicente, Cuyamaca, Jennings, and Murray reservoirs are the major water storage facilities. Much of the stored water is used to serve major population centers, including a portion of the San Diego metropolitan area and the communities of El Cajon, Santee, Lakeside, Alpine, and Julian. Annual precipitation ranges from less than 11 inches at the coast to about 35 inches around Cuyamaca and El Capitan Reservoir.

The Peñasquitos HU is described by the Basin Plan as a triangular-shaped area of about 170 square miles, extending from Poway on the east to La Jolla on the west. There are no major streams in this unit although it is drained by numerous creeks. Annual precipitation in the HU ranges from less than 8 inches along the ocean to 18 inches inland. Poway and La Jolla are the major population centers.

A majority of the project area drains to the San Diego River watershed, to the receiving waters of Forester Creek, Murray Reservoir, Lower San Diego River, and Sycamore Canyon. The northern portion of the West Sycamore area drains to the Peñasquitos watershed, through Poway Creek.



5.8.2.2 Surface Waters/Drainage Patterns

5.8.2.3 Receiving Waters

The project drains to five receiving waters including Poway Creek, Sycamore Canyon, the Lower San Diego River, Forester Creek, and Murray Reservoir (Table 5.8-1).

Table 5.8-1											
Receiving Waters By Project Area											
	Poway	Sycamore	Lower San	Forester	Murray						
Project Area	Creek	Canyon	Diego River	Creek	Reservoir						
West Sycamore Area	Χ	X									
East Elliott Area		X	Χ								
Fortuna Mountain			Х								
Area			^								
Mission Gorge Area			Χ								
Cowles Mountain Area			Χ	X	X						
Lake Murray Area					Х						
SOURCE: GHD Inc. (2014b).											

a. Beneficial Uses

As previously detailed, the San Diego RWQCB is responsible for establishing ground and surface water quality objectives for the region. Beneficial uses are defined as the uses of water necessary for the survival or well-being of humans, plants, and wildlife, which in turn serve to promote economic, social, and environmental goals. The Basin Plan assigns multiple beneficial uses pertaining to inland surface water, ground water, and coastal waters within the San Diego Watershed Management Area. Table 5.8-2 lists the beneficial uses of inland surface waters and groundwater basins within the watersheds affected by the MPUPlans. Table 5.8-3 lists the beneficial uses of the downstream coastal lagoons at the mouth of the San Diego River.

				Tak	ole 5.8	8-2								
Beneficial U	ses of Rec	eivin	g Wa				rface \	Waters a	nd Gr	ound	wate	er		
	HU Basin #	Municipal and Domestic Supply (MUN)	upply (AGR)	ndustrial Service Supply IND)	ndustrial Process Supply PROC)	. Water Recreation	Non-contact Water Recreation (REC-2)	Preservation of Biological Habitats of Special Significance (BIOL)	Warm Freshwater Habitat (WARM)	Cold Freshwater Habitat COLD)	Wildlife Habitat (WILD)	Rare, Threatened, or Endangered Species (RARE)	Shellfish Harvesting (SHELL)	Hydropower Generation (HTYD)
San Diego River Watershed	_	≥ ω	< <	ニニ			Zĸ		50	100	S	_ ₩ ш	S	エと
Inland Surface Waters														
San Diego River	907.11	+	•	•			•	•	•		•	•		
unnamed tributary	907.11	+	•				•				•	•		
Alvarado Canyon	907.11	+	•				•				•			
Murphy Canyon	907.11	+	•	•		•	•		•		•	•		
Shepherd Canyon	907.11	+	•	•		•	•		•		•			
Murray Canyon	907.11	+	•	•			•		•		•			
Slaughterhouse Canyon	907.12	0		•		•	•		•		•			
Los Coches Creek	907.12	0				•	•		•					
Forrester Creek	907.12	0		•		•	•		•		•			
Sycamore Canyon	907.12	+	•	•		•	•		•		•	•		
unnamed tributary	907.12	+	•	•		•	•		•		•	•		
Clark Canyon	907.12	+	•	•		•	•		•		•	•		
West Sycamore														
Canyon	907.12	+				•	•				•			
Quail Canyon	907.12	+	•				•				•			
Little Sycamore Canyon	907.12	+	•	•		•	•		•		•			
Spring Canyon	907.12	+	•	•		•	•		•		•	•		
Oak Canyon	907.12	+	•	•					•					
Reservoirs and Lakes														
Lake Murray	907.11													
Groundwater		1			T	ı	ı			1				
Mission San Diego HSA	907.11	0	•											
Santee HSA	907.12													
Los Peñasquitos Creek Wat		1			1				1	1				
Los Peñasquitos Creek	906.20	+	•	0		•	•		•	•	•			
Rattlesnake Creek	906.20	+	•	0		•	•		•	•	•		<u> </u>	-
Poway Creek	906.20	+	•	0		•	•		•		•		<u> </u>	-
Beeler Creek	906.20	+	•	0		•	•		•		•		<u> </u>	
Chicarita Creek	906.20	+	•	0		•	•		•		•		-	
Cypress Canyon	906.20	+		0					•				<u> </u>	
Groundwater	006.00												т—	
Poway HA	906.20			0										

A " indicates an existing beneficial use that was attained in the surface or ground water on or after November 28, 1975. A " indicates a potential beneficial use that will probably develop in future years. A "+" indicates that the water body has been exempted by the San Diego RWQCB from the municipal use designation.

¹Fishing from shore or boat permitted, but other water contact recreational (REC-1) uses are prohibited. SOURCE: San Diego RWQCB 2014.

Table 5.8-3													
Beneficial Uses of Receiving Waters – Coastal Lagoons													
Coastal Lagoons	HU Basin #	Contact Water Recreation (REC-1)	Non-contact Water Recreation (REC-2)	Warm Freshwater Habitat (WARM)	Cold Freshwater Habitat (COLD)	Wildlife Habitat (WILD)	Rare, Threatened, or Endangered Species (RARE)	Commercial and Sport Fishing (COMM)	Spawning, Reproduction, and/or Early Development (SPWN)	Shellfish Harvesting (SHELL)	Estuarine Habitat (EST)	Migration of Aquatic Organisms (MIGR)	Marine Habitat (MAR)
Mouth of San Diego River	907.11	•	•			•	•	•	•	•	•	•	•
Famosa Slough and Channel	907.12	•	•	•		•	•	•	•	•	•	•	•
Los Penasquitos Lagoon	906.10	•	•	•		•	•	•	•	•	•	•	•
SOURCE: San Diego RWQCB 2014.													

b. Impaired Water Bodies

The San Diego RWQCB has identified a variety of physical, chemical, and biological pollutants as providing impairments to receiving water bodies in the study area's watersheds. These impairments are defined within the Clean Water Act in the RWQCB's 303(d) list and updated on a three-year cycle in the 305(b) Integrated Report. The 305(b) Integrated Report lists impairments in five categories ranging from constituents that may be removed from the 303(d) list, or those pollutants that were listed without sufficient documentation or for which water quality has improved to a point that they no longer require rigorous management (Category I), to those for which strict numeric discharge limits are identified in documents known as total maximum daily loads (TMDLs). The 303(d) listed constituents requiring TMDLs are either Category IV or V on the 305(b) Report. A review of the current 305(b) Report on the RWQCB's website indicates watersheds draining from the project area have impairments requiring TMDLs for those pollutants identified in Table 5.8-4.

In 2012, the San Diego RWQCB adopted Resolution No. R9-2012-0033, incorporating the Los Peñasquitos Lagoon Sediment TMDL into the San Diego Basin Plan. The TMDL was approved by the San Diego RWQCB on January 21, 2014, and by the Office of Administrative Law on July 14, 2014. The TMDL requires that suspended sediment load and suspended sediment discharge rate of surface waters shall not be altered in such a manner as to cause nuisance or adversely affect beneficial uses.

Table 5.8-4					
Receiving Waters With Impairments Requiring TMDLs					
	Forester	Murray	Poway	Lower San	Sycamore
Pollutant	Creek	Reservoir	Creek	Diego River	Canyon
Dissolved Oxygen	X	X		X	
Phosphorous	X			X	
Nitrogen	X	X		Х	
Sulfates	Х	Х			
Selenium	Х	Х	X		
Total Dissolved Solids	Х	Х		Х	
pH	Х	X			
Turbidity	Х	X			
Fecal Coliform	X			X	
Escherichia coli	,	Х		, ,	
Trichloroethane		X			
Tetracholoethane		X			
Dichloroethylene (DCE)/Vinylidene		X			
Chloride		X			
Trichlorobenzene		Χ			
Dibromo chloropropane (DBCP)		X			
Dichloroethane		X			
		X			
Dichloroethylene,-trans					
Alachlor		X			
Aluminum		X			
Ammonia as Nitrogen		X			
Antimony		X			
Arsenic		X			
Atrazine		Х			
Barium		X			
Benzene		X			
Benzo(a)pyrene (Benzopyrene)		X			
Carbofuran		X			
Carbon tetrachloride		X			
Chlordane		X			
Chloride		X			X
Chlorobenzene (mono)		X			
Chromium (total)		Х			
Color		X			
Copper		X			
Endrin		X			
Ethylbenzene		X			
Fluoride		X			
Glyphosate		Х			
Heptachlor		X			
Heptachlor epoxide		Х			
Hexachlorobenzene/HCB		X			
Hexachlorocyclopentadiene		X			
Iron		X			
Lindane/gamma Hexachloro-					
cyclohexane (gamma-HCH)		X			
Manganese		Х		X	
Methoxychlor		X			
Molinate		X			
Nickel		X			
Oxamyl (Vydate)		X			
Pentachlorophenol (PCP)		X			
		^			
SOURCE: San Diego RWQCB 2014.					

5.8.2.4 Groundwater

The project is associated with two groundwater basins: the San Diego River Valley Groundwater Basin (River Valley Basin) and the Mission Valley Groundwater Basin (Mission Valley Basin). The Mission Valley Basin is a shallow alluvial aquifer underlying an east-west trending valley that extends from the eastern terminus of Mission Gorge west to San Diego Bay. This basin is bounded by the contacts of alluvium with the semi-permeable San Diego and Poway formations and impermeable Linda Vista Formation.

The River Valley Basin consists of alluvium deposited by the river and its tributaries. This basin is surrounded by contacts with semi-permeable rocks of the Eocene Poway Group, impermeable Cretaceous crystalline rock, and impermeable Jurassic to Cretaceous Santiago Peak volcanic rocks. Within the project area, groundwater elevations are dependent on seasonal precipitation, irrigation, land use and other factors, and as a result, groundwater levels may vary dependent on these conditions.

5.8.2.5 Flood Hazards

There are several 100-year floodplains located within the low points of the study area coinciding with drainage areas and water bodies. Within the Lake Murray area, the reservoir and the access road area south to I-8 are within a 100-year floodplain. Areas subject to flooding and mapped as 100-year floodplain include the San Diego River within the drainage of Mission Gorge, Kumeyaay Lake, and the Kumeyaay Lake Campground. Within the Fortuna Mountain area, 100-year floodplains exist near the eastern entrance to the Fortuna Mountain area from Mast Boulevard, at the grasslands area, with fingers of 100-year floodplain heading north through Spring Canyon, Little Sycamore Canyon, and Oak Canyon. Within the East Elliott area, 100-year floodplains are located within the northwest running canyons of Spring Canyon and Little Sycamore Canyon. No FEMA floodplains exist within the Cowles Mountain or West Sycamore areas.

Historically, the San Diego River flowed intermittently west of El Capitan and was characterized by periods of drought and extreme flooding events (Smythe 1908). Currently, with the addition of several dams and additional water inputs from urban runoff and treated wastewater, both within the Park and downstream of the Park, the San Diego River flows year-round and is less prone to flooding except under extreme conditions such as significant rain events. The San Diego River Watershed has a precipitation range of 10.5 to 35 inches (Weston Solutions Inc. 2007).

5.8.2.6 Hydrology

The hydrology of the project area is affected by absorption rates, drainage patterns, and the rate of surface runoff. Absorption rate is the time required for pervious ground to absorb rainwater. Drainage patterns are the footprints of travel of unabsorbed water from high elevations to lower elevations. The rate of surface runoff is how quickly unabsorbed water travels within a drainage system to receiving water. Impervious surfaces, such as new paving, prevents percolation of water into the soil, thereby increasing surface runoff rates. Instead of percolating into the soil, water flows to low-lying areas which would result in increased flood risk. Development and disturbance of

natural areas can also increase water pollution, by introducing pollutants that could drain into receiving waters without being filtered through soils.

Hydrology is also affected by topography. The study area ranges in elevation from about 100 feet above mean sea level along the San Diego River to 1,593 feet above mean sea level at the summit of Cowles Mountain. Slopes within the study area vary widely from flat to near vertical, with less than 10 percent of the land area having slopes less than 5 percent and almost 50 percent of the land has slopes steeper than 25 percent grade. Steep canyons, mesas, rolling hills, and flat bottoms in the river and canyon floors typify the area landforms. The central spine of the area extends for about 6 miles from southeast to northwest, with the prominent features being the landforms of Fortuna Mountain, Kwaay Paay, and Cowles Mountain. Lake Murray anchors the south boundary of the Park. The San Diego River, flowing through the precipitous Mission Gorge, cuts perpendicularly through the mountain land mass. A broad alluvial area expands from the north end of the gorge. Nearly all surface water within the Park drains into the San Diego River.

5.8.3 Significance Determination Thresholds

Based on the City's 2016 Significance Determination Thresholds, impacts related to hydrology and water quality would be significant if implementation of Plans and associated discretionary actions would:

- Result in an increase in impervious surfaces and associated increased runoff, or result in substantial alteration to on- and off-site drainage patterns due to changes in runoff flow rates or volumes;
- 2. Result in modifications to the natural drainage system;
- 3. Result in alterations to the course or flow of flood waters; or
- 4. Create discharges into surface or ground water, or result in increases in pollutant discharges including downstream sedimentation.

5.8.4 Impact Analysis

Issue 1: Runoff and Drainage Patterns

Would implementation of the Plans and associated discretionary actions result in an increase in impervious surfaces and associated increased runoff or result in a substantial alteration to on- and off-site drainage patterns due to changes <u>in</u> runoff flow rates or volumes?

According to the City's Significance Determination Thresholds, impacts related to hydrology would be significant if the project would increase the amount of impervious surface, resulting in additional runoff to a point that would change upstream or downstream drainage patterns from the additional flow rate or volume.

Management actions identified in the NRMP, such as hand weeding, erosion control, and exclusionary fencing, would not result in any impervious surfaces, nor would they alter drainage patterns. No impact would occur. The MPU is analyzed below.

Some of the MPU Recommendations intend to improve the hydrology of the Park. For example, Park-wide Management Recommendation 2 states to "develop maintenance guidelines to adapt the existing network of roads within the park to minimize the disruption of the natural hydrology and maintain a walking and riding surface that is conducive to recreational use. These guidelines should identify maintained widths, surface materials, and grading practices for all utility and access roads within the park, and should be acknowledged and agreed to by the City's Park & Recreation Department, the City PUD, SDCWA, and SDGE." Another example would be Park-wide Recreation Recommendation 5, which states to "keep trails and crossings within the riparian and drainages to a minimum."

Other MPU recommendations contemplate subsequent projects such as trails, parking areas, shade structures, benches, and restrooms. For example, recommendation CM-F1 states to "Plan, design and implement an off-street gravel or decomposed granite surfaced parking area with street improvements that comply with public road standards as applicable, at the Barker Way entrance to reduce some of the parking demand on the local residential streets and provide more a formal trailhead and potential for a maintainable comfort station. Ensure that temporary construction impacts associated with parking area improvements do not affect adjacent neighbors and park users.

Implementation of a gravel or decomposed granite parking area would have the potential to reduce water infiltration rates, which could result in significant impacts related to runoff and alteration of drainage patterns. In order to reduce or avoid potential impacts, parking areas and other subsequent projects implemented in accordance with the MPU-Plans would be required to maintain the same drainage characteristics in the post-project condition as compared to the pre-project conditions. As outlined in the City's Storm Water Standards Manual, the overall goal from a hydrological perspective is to ensure the peak flow rate is not significantly increased. If there is a significant increase, subsequent projects would be required to prepare a hydromodification management plan to manage, detain, and attenuate post-project runoff rates and duration to maintain or reduce pre-project downstream erosion conditions and protect stream habitat. This plan would identify the necessary improvements, such as vegetative swales, bioretention, and/or infiltration basins, which would serve to ensure the peak flow rate of the site is not significantly altered.

Furthermore, subsequent projects that have the potential to alter drainage patterns would be required to comply with the relevant sections of the LDC (Section 43.0301, et seq.), which requires that the existing flows of an area proposed for development are maintained to ensure that the existing structures and systems handling the flows are sufficient. Subsequent projects that adhere to this basic objective of the existing drainage regulations would not be expected to result in an increase in runoff. Adherence to the Municipal Storm Water Permit, likewise requires implementation of BMPs during construction of subsequent projects. The requirements of the City's Drainage Design Manual and Storm Water Standards Manual, which include installation of LID practices such as bioretention areas or pervious pavements, etc. would maintain or improve surface

runoff. Furthermore, subsequent projects implemented in accordance with the <u>MPU_Plans</u> that adhere to these requirements would likely reduce the volume and rate of surface runoff compared to the existing condition rather than increase runoff.

The quantity of runoff reduction would depend on the actual design of a future project, including open space and pervious areas, and the manner of implementation of LID practices, adherence to regulations and conformance with existing City regulations. Because the amount and rate of runoff is dependent upon future project design, impacts associated with subsequent projects implemented in accordance with the MPU-Plans would be significant (Impact HYD/WQ-1).

Issue 2: Natural Drainage System

Would implementation of the Plans and associated discretionary actions require modifications to the natural drainage system?

Criteria in the City of San Diego's 2016 Significance Determination Thresholds for hydrology and water quality state that significant impacts related to altered drainage patterns may result under the following conditions:

- Construction of impervious surfaces (generally one acre or more) adversely affects groundwater recharge capacity in areas utilizing well water;
- A substantial change to stream flow velocities or quantities; and
- Substantial changes in drainage patterns on downstream properties. If these modifications
 occur there may be significant impacts on environmental resources such as biological
 communities and archaeological resources; and a determination by a drainage study that
 the project would result in adverse impacts on downstream properties or environmental
 resources.

Management actions identified in the NRMP, such as hand weeding, erosion control, and exclusionary fencing, would not result in any impervious surfaces, nor would they alter drainage patterns. No impact would occur. The MPU is analyzed below.

As previously detailed, some subsequent projects implemented in accordance with the MPU-Plans have the potential to alter drainage patterns by introducing new impervious surfaces within the park. An increase in impervious surfaces could increase runoff, resulting in increases in stream flow velocity and/or quantity. These changes could alter drainage patterns on downstream properties and adversely affect environmental resources in these downstream areas. In addition, new impervious surfaces could adversely affect groundwater recharge capacity by reducing the area available for rainwater infiltration into the study area soils.

In order to reduce or avoid potential impacts, parking areas and other subsequent projects implemented in accordance with the MPU-Plans would be required to maintain the same drainage characteristics in the post-project condition as compared to the pre-project conditions. As outlined in the City's Storm Water Standards Manual, the overall goal from a hydrological perspective is to ensure the peak flow rate is not significantly increased. If there is a significant increase, subsequent

projects would be required to prepare a hydromodification management plan to manage, detain, and attenuate post-project runoff rates and duration to maintain or reduce pre-project downstream erosion conditions and protect stream habitat. This plan would identify the necessary improvements, such as vegetative swales, bioretention, and/or infiltration basins, which would serve to ensure the peak flow rate of the site is not significantly altered.

The volume and velocity of runoff associated with some subsequent projects implemented in accordance with the <u>MPU-Plans</u> would depend on the actual design, including the quantity of pervious areas, and the manner of implementation of LID practices, such as detention basins. Because the amount and rate of runoff is dependent upon future project design, subsequent projects implemented in accordance with the <u>MPU-Plans</u> would be significant (Impact HYD/WQ-2).

Similarly, the specific impacts to infiltration capacity within a groundwater basin would need to be evaluated at a project level as subsequent projects are proposed under the MPUPlans. As the vast majority of the Park would remain in open space and would provide significant capacity for rain water infiltration and groundwater recharge, significant impacts related to groundwater recharge are not anticipated.

Issue 3: Flow Alteration

Would implementation of the Plans and associated discretionary actions result in alterations to the course or flow of flood waters?

Criteria in the City of San Diego's 2016 Significance Determination Thresholds for hydrology and water quality state that significant impacts related to altered flow patterns may result under the following conditions:

• A project-related increase in runoff from the site or would develop within the FEMA 100-year floodplain, resulting in an increase in on- or off-site flooding hazards.

Subsequent projects implemented in accordance with the MPU_Plans_would have the potential to result in an increase in impervious surfaces and runoff that could increase on- or off-site flooding hazards. In addition, activities within SFHAs and 100-year floodplains could increase flooding hazards.

Within the study area, FEMA-designated 100-year floodplains exist within low-lying areas coinciding with drainage areas and water bodies. In addition, the San Diego River, several creeks, and SFHAs are within the study area.

Subsequent projects implemented in accordance with the MPU-Plans would have the potential to impact such areas. Some subsequent projects contemplated by the MPU-Plans also include guidelines to manage riparian crossings which could impact flow patterns and potentially result in an increased risk of flooding. For example, Park-wide Facility Recommendations 14 and 15 state, "Maintain and repair park and utility roads and crossings of streams on an as needed basis" and "Construct vehicular on-grade dip crossings of creeks and drainages with local rock to create a stable crossing where practicable. Concrete dip crossings or bridge structures may be required to due to

local site conditions." Implementation of these recommendations could result in altered flow patterns and an increase in on- or off-site flooding hazards.

In order to reduce or avoid potential impacts related to flooding, subsequent projects implemented in accordance with the MPU-Plans would be required to maintain the same drainage characteristics in the post-project condition as compared to the pre-project conditions. All subsequent projects within the vicinity of a SFHA would be subject to applicable requirements and regulations of FEMA and regulations provided in Chapter 14, Article 3, Division 1 of the LDC.

Because the drainage characteristics and the specific location of each subsequent project is dependent upon future project design, impacts associated with subsequent projects implemented in accordance with the <u>MPU-Plans</u> would be significant (Impact HYD/WQ-3).

Issue 4: Water Quality

Would implementation of the Plans and associated discretionary actions create discharges into surface or ground water, or result in increases in pollutant discharges including downstream sedimentation?

Criteria in the City of San Diego's 2016 Significance Determination Thresholds for hydrology and water quality state that significant impacts related to erosion and sedimentation may result if the project would:

- Grade, clear, or grub more than one acre of land, especially into slopes over a 25 percent grade and drain into a sensitive water body or stream.
- Result in non-compliance with the City's Water Quality Standards manual and BMP requirements.

Management actions identified in the NRMP, such as hand weeding, erosion control, and exclusionary fencing, would not result in any pollutant discharges or other water quality violations. No impact would occur. The MPU is analyzed below.

Various MPU Recommendations generally intend to improve the water quality of the Park. For example, the installation of trash receptacles and pet-waste stations at trail heads would help to minimize water quality impacts associated with trash, food, and pet waste. Other MPU Recommendations state to revegetate disturbed areas and close unauthorized trails, which would likely result in a reduction in the amount of pollutants and sedimentation traveling to downstream water bodies due to the filtration effects of vegetated areas. MPU Recommendation LM-M6 states, "Continue to maintain the urban runoff diversion channel around the lake and look for opportunities to improve the water quality within the channel before it is discharged downstream of the dam." Other MPU Recommendations would address existing erosion issues and sedimentation with the goal of biological habitat protection.

Other subsequent projects contemplated by the MPU—Plans include trail construction, or maintenance and construction of parking areas with gravel or decomposed granite. In addition, new seating, shade structures and other recreational amenities could be constructed. These activities could result in pollutants such as trash and debris, pet waste, and conventional vehicular pollutants,

sediments, nutrients, organic compounds, oxygen demanding substances, pesticides, and bacteria and viruses.

These types of subsequent projects may require grading and result in exposed soil, which could result in sedimentation, affecting downstream water quality, particularly where grading and/or land disturbance would occur on slopes over 25 percent grade. For example, the MPU includes multiple conceptual trail alignments. While soil compaction from routine use by hikers would provide stability of the trail soils, some trails may require standard erosion controls (e.g., soil solidifiers) in areas with loose, less-cohesive soils. If trails are located within natural vegetation, the surrounding vegetated lands can act as a vegetative buffer strip to capture potential sedimentation and detain sediments from release within the watershed during runoff generating storm events.

Any parking areas implemented in accordance with the <u>MPU-Plans</u> would be required to prepare a project-specific water quality technical report, which is required to describe the BMPs that would be incorporated in a project to mitigate the impacts of runoff on water quality. Priority Development Projects, such as parking areas, are subject to LID design standards, and LID features attempt to mimic predevelopment hydrologic conditions.

Future MPU recommendations would also be subject to the requirements of the City's Storm Water Runoff and Drainage Regulations (Chapter 14, Article 2, Division 2 of the LDC) and other appropriate agencies (e.g., RWQCB).

The runoff and potential pollutant and/or sedimentation load associated with specific future projects would depend on the actual design of a future project, including the topography and slopes in the project area, the quantity of pervious areas, and the manner of implementation of LID practices. Because the amount of runoff and amount and type of pollutants is dependent on the details of the future subsequent project design, site-specific conditions, and the specific BMP and/or LID measures selected, impacts would be significant (Impact HYD/WQ-4).

5.8.5 Significance of Impacts

Issue 1: Runoff and Drainage Patterns

Subsequent projects contemplated by the MPUPlans, such as parking areas, would have the potential to increase the amount of impervious surfaces, which could result in additional runoff to a point that would change drainage patterns from the additional flow rate or volume. Therefore, impacts would be significant (Impact HYD/WQ-1).

Issue 2: Natural Drainage System

Subsequent projects contemplated by the <u>MPUPlans</u>, such as parking areas, would have the potential to adversely affect natural drainage patterns. Therefore, impacts would be significant (Impact HYD/WQ-2).

Issue 3: Flow Alteration

Subsequent projects implemented in accordance with the MPU-Plans would have the potential to impact FEMA-designated 100-year floodplains, the San Diego River, several creeks, and other SFHAs that are within the study area. Because the drainage characteristics and the specific location of each subsequent project is dependent upon future project design, impacts associated with subsequent projects implemented in accordance with the MPU-Plans would be significant (Impact HYD/WQ-3).

Issue 4: Water Quality

Although various MPU recommendations generally intend to protect water quality, other subsequent projects implemented in accordance with the MPU Plans would have the potential to result in water quality impacts. Because each subsequent project is dependent upon future project design, impacts associated with subsequent projects implemented in accordance with the MPU Plans would be significant (Impact HYD/WQ-4), and mitigation is required.

5.8.6 Mitigation Framework

Implementation of the following mitigation framework would reduce **Impacts HYD/WQ-1**, **HYD/WQ-2**, **and HYD/WQ-3** to below a level of significance:

MM-HYD/WQ-1:

Prior to approval of subsequent projects implemented in accordance with the MPU Plans that involve impervious surfaces creation, the applicant shall demonstrate to the satisfaction of the City Engineer, that future projects are sited and designed to minimize impacts on absorption rates, drainage patterns, and surface runoff rates and floodwaters in accordance with current City and RWQCB regulations identified below. Future design of projects shall incorporate all applicable and practicable measures outlined below in accordance with the storm water construction requirements of the State Construction General Permit, Order No. 2009-00090DWQ, or subsequent order, and the Municipal Storm Water Permit, Order No. R9-2013-0001, or subsequent order, RWQCB, the City Storm Water Runoff and Drainage Regulations (Chapter 14, Article 2, Division 2 of the LDC), and the LDC, and shall be based on the recommendations of a detailed water quality and hydraulic analysis. The applicant shall also coordinate with the <u>Transportation and Storm Water Department - Storm Water Division when</u> considering elements such as proposed roadway redesign, curbs and gutters, or additions to or modification of other storm water infrastructure, and to ensure that potential impacts to storm water infrastructure are addressed, including drainage facility capacity and operation and maintenance.

a. San Diego RWQCB

 Comply with all NPDES permit(s) requirements, including the development of a storm water pollution prevention plan (SWPPP) if the disturbed soil area is one acre or more, or a Water Quality Control Plan if less than one acre, in accordance with the City's Storm Water Standards.

- If a future project includes in-water work, a Section 404 Permit (from USACE) and a Streambed Alteration Agreement (from CDFW) shall be required.
- Comply with the San Diego RWQCB water quality objectives and bacteria TMDL and Los Peñasquitos Lagoon Sediment TMDL.

b. City of San Diego

To prevent flooding, subsequent projects implemented in accordance with the MPU_Plans_shall be designed to incorporate any applicable measures from the City of San Diego LDC, ESL Regulations (Ch. 14, Art. 03, Div. 01, Sec. 193143.0145 and 193143.0146). Flood control measures that shall be incorporated into future projects within a SFHA, or within a 100-year floodway, include but are not limited to the following:

- Prior to issuance of building permits or approval of any project within or in the vicinity of a floodway or SFHA, all proposed development within a SFHA is subject to the following requirements and all other applicable requirements and regulations of FEMA and those provided in Chapter 14, Article 3, Division 1 of the LDC.
- 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 shall not result in any increase in flood levels during the occurrence of the base flood discharge except as allowed under Code of Federal Regulations Title 44, Chapter 1, Part 60.3(c) (13).
- If the engineering analysis shows that development will alter the floodway or floodplain boundaries of the SFHA, a Conditional Letter of Map Revision from FEMA shall be obtained.
- Fill placed in the SFHA for the purpose of creating a building pad shall be compacted to 95 percent of the maximum density obtainable with the Standard Proctor Test Fill method issued by the American Society for Testing and Materials. Granular fill slopes shall have adequate protection for a minimum flood water velocity of five feet per second.
- Improvement plans shall note "Subject to Inundation" for all areas lower than the base elevation plus two feet.

- If structures will be elevated on fill such that the lowest adjacent grade is at or above the base flood elevation, a Letter of Map Revision based on Fill (LOMR-F) must be obtained prior to occupancy. The developer or applicant shall provide all documentation, engineering calculations, and fees required by FEMA to process and approve the LOMR-F.
- In accordance with Chapter 14, Article 3, Division 1 of the LDC channelization or other substantial alteration of rivers or streams shall be limited to essential public service projects, flood control projects, or projects where the primary function is the improvement of fish and wildlife habitat. The channel shall be designed to ensure that the following occur:
 - Stream scour is minimized.
 - Erosion protection is provided.
 - Water flow velocities are maintained as specified by the City Engineer.
 - There are neither significant increases nor contributions to downstream bank erosion and sedimentation of sensitive biological resources; acceptable techniques to control stream sediment include planting riparian vegetation in and near the stream and detention or retention basins.
 - Wildlife habitat and corridors are maintained.
 - Groundwater recharge capability is maintained or improved.
 - Within the flood fringe of a SFHA or floodway, permanent structures and fill for permanent structures, roads, and other development are allowed only if the following conditions are met:
 - The development or fill shall not significantly adversely affect existing sensitive biological resources on-site or off site.
 - 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 shall it cause adverse impacts related to flooding of properties located upstream or downstream, nor shall it increase or expand a FIRM Zone A.
 - Grading and filling are limited to the minimum amount necessary to accommodate the proposed development, harm to the

environmental values of the floodplain is minimized including peak flow storage capacity, and wetlands hydrology is maintained.

- The development neither significantly increases nor contributes to downstream bank erosion and sedimentation nor causes an increase in flood flow velocities or volume.
- There shall be no significant adverse water quality impacts to downstream wetlands, lagoons, or other sensitive biological resources, and the development is in compliance with the requirements and regulations of the NPDES as implemented by the City of San Diego.

The following Mitigation Framework would reduce **Impact HYD/WQ-4** to below a level of significance:

MM-HYD/WQ-2:

Subsequent projects implemented in accordance with the MPU-Plans shall identify site-specific measures that reduce significant project-level water quality impacts to less than significant levels in accordance with the existing regulatory framework addressing drainage, storm water, and protection of water quality. Where mitigation is determined to be necessary and feasible, measures shall be included in an MMRP for the project.

The following general measures would be implemented for future projects within the scope of the Plans. These measures would be updated, expanded, or refined when applied to specific future projects based on project-specific design and changes in existing conditions in order to demonstrate compliance with local, state, and federal laws in place at the time future projects are proposed.

Future projects shall be sited and designed to minimize impacts on receiving waters, in particular the discharge of identified pollutants to an already impaired water body. Prior to approval of any entitlements for any future project, the City shall require measures to ensure that impacts to receiving waters are fully mitigated in accordance with the requirements of the City's Storm Water Runoff and Drainage Regulations (Chapter 14, Article 2, Division 2 of the LDC) and other appropriate agencies (e.g., RWQCB). To prevent erosion, siltation, and transport of urban pollutants, all future projects shall be designed to incorporate any applicable storm water improvement, both off- and on-site, in accordance with the City of San Diego Storm Water Standards Manual. The applicant shall also coordinate with the <u>Transportation and Storm Water Department - Storm Water Division when</u> considering elements such as proposed roadway redesign, curbs and gutters, or additions to or modification of other storm water infrastructure, and to ensure that potential impacts to storm water infrastructure are addressed, including drainage facility capacity and operation and maintenance.

Storm water improvements and water quality protection measures that shall be required for future projects include:

- Increasing on-site filtration;
- Preserving, restoring, or incorporating natural drainage systems into site design;
- Directing concentrated flows away from MHPA and open space areas. If not possible, drainage shall be directed into sediment basins, grassy swales, or mechanical trapping devices prior to draining into the MHPA or open space areas;
- Reducing the amount of impervious surfaces through selection of materials, site planning, and narrowing of street widths where possible;
- Increasing the use of vegetation in drainage design;
- Maintaining landscape design standards that minimize the use of pesticides and herbicides; and
- To the extent practicable, avoiding development of areas particularly susceptible to erosion and sediment loss.

San Diego RWQCB

- The requirements of the RWQCB for storm water quality are addressed by the City in accordance with the City NPDES requirements and the participation in the regional permit with the RWQCB.
- Prior to permit approval, the City shall ensure any impacts on receiving waters are precluded or mitigated in accordance with the City of San Diego Storm Water Regulations.
- In accordance with the City of San Diego Storm Water Standards Manual, development shall be designed to incorporate on-site storm water improvements satisfactory to the City Engineer and shall be based on the adequacy of downstream storm water conveyance.

5.8.7 Significance after Mitigation

Issues 1 through 3: Runoff, Drainage, Flow Alteration

Potentially significant impacts related to runoff and drainage patterns, drainage systems, and flow alteration would be reduced to less than significant through implementation of the Mitigation Framework MM-HYD/WQ-1, detailed above. Compliance with this framework would ensure future projects implemented in accordance with the Plans and associated discretionary actions would be

required to comply to the existing regulatory framework addressing drainage, runoff, and flooding. With implementation of the mitigation framework described in MM-HYD/WQ-1, impacts would be reduced to below a level of significance.

Issue 4: Water Quality

Subsequent projects implemented in accordance with the <u>MPU_Plans_</u>would be required to implement the Mitigation Framework described in MM-HYD/WQ-2. Compliance with the Mitigation Framework would reduce potential water quality impacts to below a level of significance.

5.9 Geology and Soils

This section addresses the potential impacts related to geology and soils that could result from implementation of the Master Plan Update (MPU) and Natural Resources Management Plan (NRMP) (collectively, the Plans for the Mission Trails Regional Park Park. It also identifies existing regulations applicable to subsequent projects, as well as geologic formations, soils, and potential geological hazards. It is based on the geotechnical study prepared for the Project (Appendix F-1), a Supplemental Geologic Hazard Analysis for Rockfall Potential (Appendix F-2), and secondary source information, such as the City of San Diego's (City's) Seismic Safety Study.

5.9.1 Regulatory Framework

5.9.1.1 State

a. Alquist-Priolo Earthquake Fault Zoning Act

The State of California Alquist-Priolo Earthquake Fault Zoning Act (1972) was established to mitigate the hazard of surface faulting to structures for human occupancy. Pursuant to the act, the State Geologist has established regulatory zones (known as earthquake fault zones) around surface traces of active faults. These have been mapped for affected cities, including San Diego. A detailed geologic investigation must be prepared prior to receiving a permit in an area extending between 200 and 500 feet on both sides of known potentially and recently active earthquake fault zone traces.

b. Seismic Hazards Mapping Act

The Seismic Hazards Mapping Act was passed by the state in 1990 and contains seismic safety standards. The act includes non-surface fault rupture earthquake hazards, including liquefaction and seismically induced landslides. There are no seismic hazard maps that have been completed by the state for the County of San Diego.

c. California Building Code

The California Building Code (CBC) is included in California Code of Regulations (CCR) Title 24, and is a portion of the California Building Standards Code. State law requires that all building standards must be based on Title 24. The CBC incorporates the International Building Code (IBC), a widely adopted model building code used nationally. Many standards in the CBC have adopted and adapted elements of the IBC. Also included are other necessary California amendments, including criteria for seismic design, that address California's unique conditions.

5.9.1.2 Local

a. Seismic Safety Study

The City's Seismic Safety Study is a series of maps indicating likely geologic hazards throughout the City. The maps do not provide site-specific information; they are used as a guide to determine relative risk. The study identifies areas prone to liquefaction and earthquake-induced landslides as a Zones of Required Investigation, which require a report of the geotechnical condition prior to obtaining a permit. The level of geotechnical analysis required for project review is dependent on the type of permit being sought (e.g., land planning, land development, and/or building); the geological hazard category; the building type/land use group; and the relative risk.

b. San Diego Municipal Code - Land Development Code

The Land Development Code (LDC) regulates development on steep hillsides and includes requirements for foundations and preparation of soils and geologic reports within the City. Development that proposes encroachment into a steep hillside must comply with the Steep Hillside Guidelines in the City's Land Development Manual, factoring in various local conditions. The Structural Survey and Engineering Report, when required, evaluates a structure's ability to resist forces imposed by an earthquake and prevent structural failure.

The LDC also requires submittal, review, and approval of site-specific geotechnical investigations when required by Section 1803.2 of the CBC, Section 145.1803 (d) of the San Diego Municipal Code (SDMC), or the Building Official, for all new structures, additions to existing structures not exempted by SDMC Section 145.1803(b), or whenever the occupancy classification of a building changes to a higher relative hazard category, consistent with the requirements of Section 145.1803 of the SDMC. SDMC Section 142.0146 requires all grading work to incorporate erosion and siltation control measures in accordance with Chapter 14, Article 2, Division 4 (Landscape Regulations) and the standards established in the Land Development Manual. The regulations prohibit sediment and pollutants from leaving the work site and requires the property owner to implement and maintain temporary and permanent erosion, sedimentation, and water pollution control measures.

c. City of San Diego General Plan Policies

The City's General Plan presents goals and policies for geologic and soil safety in the Public Facilities, Services, and Safety Element. Specifically, Policy PF-Q.1 states the following:

Protect public health and safety through the application of effective seismic, geologic and structural considerations.

a. Ensure that current and future community planning and other specific land use planning studies continue to include consideration of seismic and other geologic hazards. This information should be disclosed, when applicable, in the California Environmental Quality Act (CEQA) document accompanying a discretionary action.

- b. Maintain updated Citywide maps showing faults, geologic hazards, and land use capabilities, and related studies used to determine suitable land uses.
- c. Require the submission of geologic and seismic reports, as well as soils engineering reports, in relation to applications for land development permits whenever seismic or geologic problems are suspected.
- d. Utilize the findings of a beach and bluff erosion survey to determine the appropriate rate and amount of coastline modification permissible in the City.
- e. Coordinate with other jurisdictions to establish and maintain a geologic "data bank" for the San Diego area.
- f. Regularly review local lifeline utility systems to ascertain their vulnerability to disruption caused by seismic or geologic hazards and implement measures to reduce any vulnerability.
- g. Adhere to state laws pertaining to seismic and geologic hazards.

5.9.2 Environmental Setting

5.9.2.1 Regional Geologic Setting

Topographically, the region of San Diego County in which the study area is located is characterized by elevated terraces (mesas) punctuated by intervening river valleys, which includes the San Diego River Valley that extends in a northeast to southwest direction north of Mission Gorge Road through the center of the park. The topography is generally very rugged, with elevations ranging dramatically throughout the different areas, from approximately 100 feet above mean sea level along the San Diego River to 1,593 feet above mean sea level at the summit of Cowles Mountain. The Park contains a variety of topographic features, including canyons, valleys, mountains, hills, and low-lying areas. Approximately 40 percent of the study area has slopes between 5–25 percent, and another 40 percent between 25–50 percent. A little more than 10 percent of the study area has slopes steeper than 50 percent.

Geologically, this area consists of a layer cake sequence of Cenozoic sedimentary rock units which preserve portions of the last 47 million years of Earth history. These Cenozoic sedimentary rocks overlie a deeply eroded terrain formed in significantly older crystalline basement rocks (e.g., metavolcanics and granites) of the massive Peninsular Ranges Batholith. The oldest sedimentary rocks exposed in the study area date from the Eocene Epoch and include the Friars Formation, Stadium Conglomerate, Mission Valley Formation, and Pomerado Conglomerate. In two small areas along the western edge of the park boundaries, the Eocene strata are overlain by Pleistocene-age Very Old Paralic Deposits formerly known as the Lindavista Formation. These are further overlain by much younger Pleistocene and Holocene-age deposits in river valleys and areas of recent landslides west of North and South Fortuna Mountains.

5.9.2.2 Geologic Formations

Figure 5.9-1 provides the geographic distribution of the geology within the study area. A brief description of the dominant geological formations within the study area is provided below.

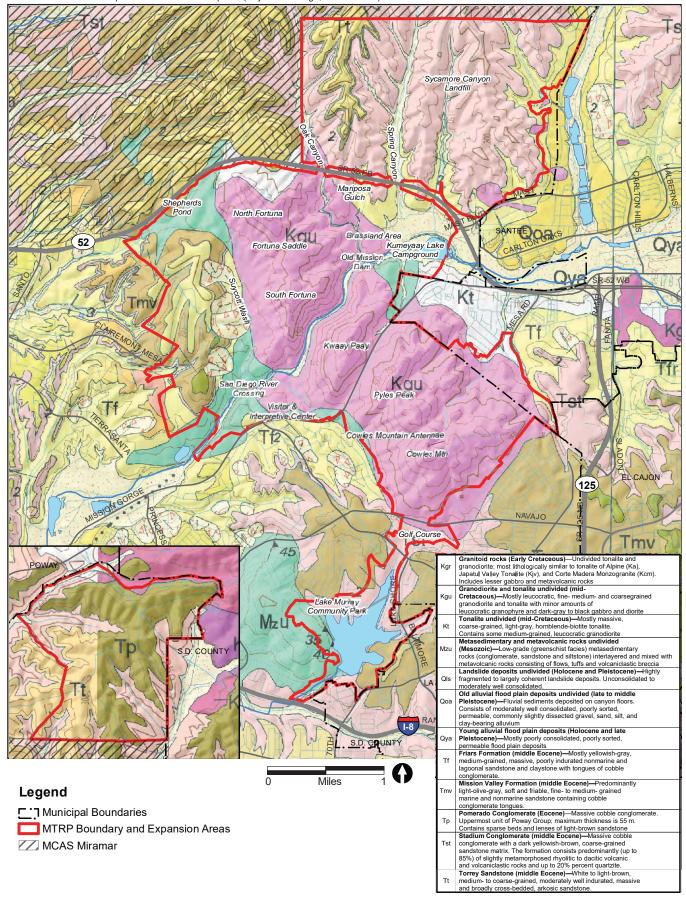


FIGURE 5.9-1 Geology

a. Undivided Granodiorite and Tonalite (Kgu)

These Cretaceous-age igneous rocks consist of mostly fine-, medium-, and coarse grained diorites and tonalites, although a few dark gray to black gabbros are encountered in some areas. The undivided granodiorites and tonalites make up most of the rock exposures in study area south of State Route 52 (SR-52), including the peaks of North and South Fortuna Mountains, Kwaay Paay, Pyles Peak, and Cowles Mountain. Other isolated pockets of undivided granodiorite and tonalite crop out along the eastern edge of the park to the north of SR-52.

b. Stadium Conglomerate (Tst)

The Stadium Conglomerate is a massive cobble conglomerate with a dark-yellowish brown, coarse-grained sandstone matrix. Rocks of the Stadium Conglomerate were deposited within the San Diego embayment by a westward-flowing river system and consist of a massive cobble conglomerate with a dark yellowish-brown coarse-grained sandstone matrix. The Stadium Conglomerate has a limited area of exposure west of Fortuna Mountain and south of SR-52. More extensive outcrops of the Stadium Conglomerate occur along the northern shore of Lake Murray.

c. Undivided Metasedimentary and Metavolcanic Rocks (Mzu)

This formation consists of late Jurassic to early Cretaceous age metasedimentary rocks interlayered and mixed with metavolcanic rocks. Outcrops of the metasedimentary and metavolcanic rocks occur along the western foothills of the North and South Fortuna Mountains and along the north side of Mission Gorge Road, west of Golfcrest Drive. Additional pockets of these crystalline rocks crop out along the southwestern borders of Kumeyaay Lake in the east central region of the Park, and along the southwestern edge of Lake Murray in the south.

d. Pomerado Conglomerate (Tp)

The Pomerado Conglomerate is a massive cobble conglomerate with a dark-yellowish brown, coarse-grained sandstone matrix. This formation is approximately 40 million years old (Middle to Late Eocene). The Pomerado Conglomerate crops out at the highest elevations along the rim trails in the western third of the study area as well as the highest elevations in the West Sycamore area.

e. Friars Formation (Tf)

The Friars Formation consists of mid-Eocene aged non-marine and lagoonal sandstones, siltstone, mudstones, and cobble conglomerate. Rocks of this formation are generally moderately hard, weak to moderately consolidated, and fresh to slightly weathered. The Friars Formation is exposed at lower elevations across the study area, particularly in the valleys and immediately west of Fortuna Mountain. The formation is also found on both sides of SR-52, along the north side of Mission Gorge Road and is exposed in the West Sycamore area.

f. Other Formations

Smaller instances of geological formations occur throughout the study area. As shown in Figure 5.9-1, these include Cuyamaca gabbro (Kc), undivided hypabyssal rocks (Kgh), granitoid rocks (Kgr), undivided tonalites (kt), Mission Valley formation (Tmv), Lindavista formation (Glv), undivided old alluvial flood plain deposits (qoa), young alluvial flood plain deposits (qya), and undivided landslide deposits (Qls).

5.9.2.3 Soils

The Mesozoic era geology within the Lake Murray, Cowles Mountain, Mission Gorge, and Fortuna Mountain areas has weathered into four primary soil series: acid igneous rock; metamorphic rock; Cieneba rocky coarse sandy loams; and Friant rocky fine sandy loam. Specific soil types within the Park are shown on Figure 5.9-2. The south and west facing slopes of Cowles Mountain, the west side of Pyles Peak, south side of Kwaay Paay, and east face of South Fortuna Mountain are acid igneous rock or metamorphic rock where 50-90 percent of the surface is dominated by large boulders and rock outcrops. Cieneba soils occur on the north slope of Cowles Mountain and the western slope of Fortuna ridgeline and are characterized as shallow, moderate to rapid permeability, medium to very rapid runoff, and moderate to very high erosion hazard.

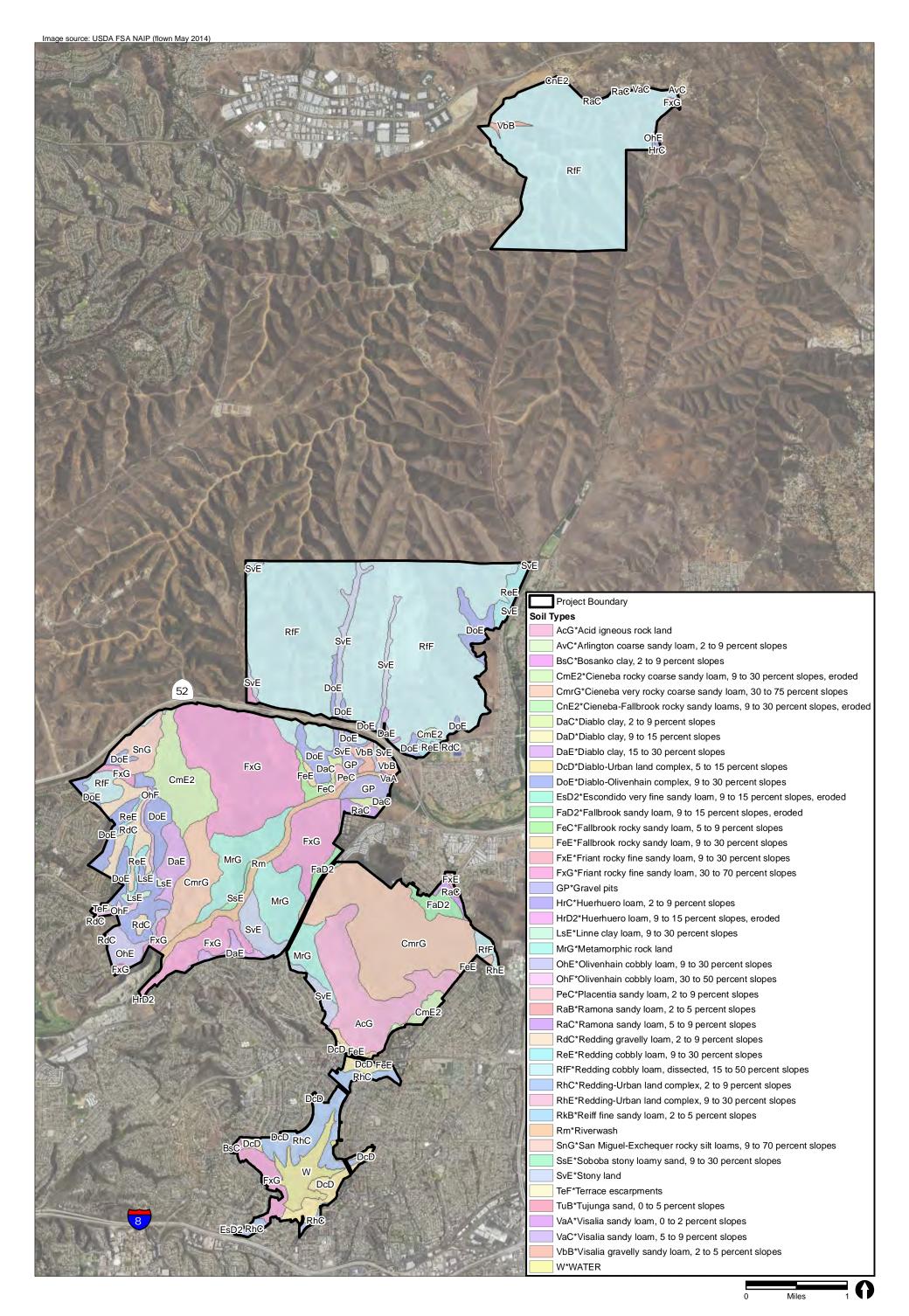
Friant soils occur on the west side of Lake Murray, south of the river and west of the Visitor Center, on the north slope of Kwaay Paay, and the northern and eastern slopes of North and South Fortuna Mountain. Friant soils are characterized as shallow, moderate to rapid permeability, rapid to very rapid runoff, and moderate to very high erosion hazard. Diablo clays and Tujunga sands dominate the area around Lake Murray. Diablo clays and Redding cobbly loams dominate Suycott Wash and the western edge of the park. Diablo soils are characterized as moderately deep to deep, slow permeability, medium to rapid runoff, and slight to high erosion hazard. Redding soils are characterized as shallow, slow permeability, medium to rapid runoff, and slight to high erosion hazard. The soils within the East Elliott and West Sycamore areas are uniformly Redding gravely loams.

Undocumented fill occurs throughout several areas within the Park. Fill is unsuitable for support of structural fill or settlement-sensitive structures. Where placed on slopes, undocumented fills are subject to downslope movement (creep, sliding or shallow debris flows). The undocumented fill soil would be suitable for reuse as compacted fill provided deleterious material including construction debris, vegetation, and trash is removed.

5.9.2.4 Geologic Hazards

a. Faulting

The study area is located in a seismically active area, as is most of southern California. The San Diego region is within a tectonic province bounded by the Elsinore Fault Zone to the east and the San Clemente Fault Zone to the west. Most of these faults run in a northwest-southeast direction and are the product of crustal stresses associated with movement of the Pacific and North American lithospheric plates. An active fault is one that has had surface displacement within the Holocene



time. A potentially active fault is any fault considered to have been active during Quaternary time. The study area is within a potentially active fault zone known as the La Nación Fault Zone. The La Nación Fault Zone system is a series of moderate- to high-angle normal faults striking north roughly parallel to the coast line. This fault zone extends from the Mission Gorge area of Mission Valley south to the Mexican border.

Six active faults are located within a 50-mile radius of the study area. The Newport-Inglewood/Rose Canyon Fault Zone, located approximately 9 miles west of the study area, would be the dominant source of potential ground motion within the study area. Other active faults within a 50-mile radius include Coronado Bank, Palos Verdes Connected, Elsinore, and Earthquake Valley faults. Potential earthquake magnitude within the study area as a result of these off-site faults that experience a maximum estimated seismic event between 6.8 to 7.9 magnitude. The study area would be subject to moderate to severe ground shaking in the event of a major earthquake on the Newport-Inglewood/Rose Canyon Fault Zone or any other active faults in southern California.

b. Liquefaction Potential

Seismically induced soil liquefaction is a phenomenon in which loose, saturated, granular materials develop high pore-water pressures and lose strength. In that case, the materials may act as fluids under the stress of ground shaking, magnifying the ground-shaking effects. Typically, loose fine-grained sands and silts below the water table are most susceptible to this process. Potentially liquefiable deposits typically exist in deep alluvium areas. The San Diego River runs through a portion of the study area, which is underlain by saturated or semi-saturated alluvial and/or slope wash deposits that may be subject to liquefaction and seismic settlement during moderate to large earthquake events.

c. Landslides

Landslides are caused by both natural events such as earthquakes, rainfall and erosion and human activities such as grading and filling. Several existing landslides are present along Father Junipero Serra Trail within the Park. These deposits usually involve soil and slope wash deposits on steep slopes underlain by weathered bedrock. Other landslides involving the Friars Formation have occurred in recent years on slopes south of Mission Gorge Road. Other types of slope instability present in the study area include rockfalls, rock block failures, and debris flow. Rockfalls can occur wherever boulders or rock outcrops are exposed on steep slopes or cliffs. Old landslides and landslide-prone formations are the principal non-seismic geologic hazard within the City (City of San Diego 2008e). Conditions to be considered in regard to slope instability include inclination, characteristics of the soil and rock orientation of the bedding, and the presence of groundwater.

d. Tsunamis and Seiches

The study area is not located near the ocean or downstream of any large bodies of water. Therefore, the risk associated with inundation by tsunamis or seiches is low.

5.9.3 Significance Determination Thresholds

Based on the City's 2016 Significance Determination Thresholds, impacts related to geology and soils would be significant if implementation of the Plans and associated discretionary actions would:

- 1. Expose people or property to geologic hazards such as earthquakes, landslides, mudslides, liquefaction, ground failure, or similar hazards; or
- 2. Increase the potential for erosion of soils on- or off-site.

5.9.4 Impact Analysis

Issue 1: Geologic Hazards

Would implementation of the Plans and associated discretionary actions expose people or property to geologic hazards such as earthquakes, landslides, mudslides, liquefaction, ground failure, or similar hazards?

The NRMP would have no impact in relation to exposing people or property to geological hazards, as it specifies management actions related to the protection of sensitive biological resources. The MPU is analyzed below.

Based on a review of the City's Seismic Safety Study, a majority of the study area is located in a low to moderate relative risk area for geotechnical hazards. The southern portion of the study area around the Lake Murray area is located within a nominal to low geotechnical and relative risk area. Small, scattered areas within the Fortuna Mountain, Mission Gorge, and East Elliott areas have a moderate to high relative risk.

Unstable geologic conditions found throughout the study area may expose people to hazards if they are not properly remediated. Soil and geologic conditions that would impact the study area may include:

- Ground-shaking effects associated with earthquakes from the Newport-Inglewood/Rose Canyon Fault Zone and other active fault zones;
- Liquefaction in areas in proximity to the river that are underlain by saturated or semisaturated alluvial and/or slope wash deposits; and
- Landslides, mudslides, or ground failure within landslide-prone formations such as Friars Formation, and steep canyon slopes;
- Rockfall hazards.

Potential impacts associated with each of these issues are described below. There would be no impact related to tsunamis and seiches as the study area is not near the ocean or downstream of any large bodies of water.

a. Ground Failure and Liquefaction

Southern California is one of the most seismically active regions in the United States. The source of most earthquakes felt in the San Diego region is from Imperial Valley and offshore fault systems. Faults within the immediate area include the La Nación Fault Zone and the Rose Canyon Fault Zone. Faults in this zone are considered to be potentially active and active, respectively, and would subject the study area to moderate to severe ground shaking. Liquefaction and ground failure is typically associated with seismic activity. Portions of the study area may be susceptible to liquefaction and ground failure, such as areas proximate to the San Diego River that are underlain by saturated or semi-saturated alluvial and/or slope wash deposits.

Subsequent projects implemented under the MPU_Plans_would not expose people to seismic hazards because it would not create new habitable structures (i.e., residential development). However, seismic events within local fault zones have the potential to damage other improvements recommended within the MPU such as trails, picnic areas, and other facilities.

For example, MPU Recommendation F1 for the West Sycamore area (see Figure 3-8) states to "Provide a restroom, ranger office, hitching posts, shade structure, and picnic tables at the West Sycamore staging area." Recommendation F2 for the East Elliott area states to "Consider providing fire resistant shade structures consistent with the Design Guidelines (Appendix G) at key locations within the East Elliott area where appropriate." Implementation of these subsequent projects would result in new structures that could be damaged in the event of a seismic event. Damage could result from ground shaking, liquefaction, or ground failure depending on the underlying geological conditions. However, compliance with the CBC reduces these potential hazards to an acceptable level of risk. The regulations that would apply to construction of structures within the Park that would be implemented at the project level are described below.

The requirements for a preliminary geotechnical investigation report are contained in SDMC Section 145.1803 and Information Bulletin 515. These requirements are based on a combination of site attributes; building, structure, or facility class; and storm water standards. Site attributes may include presence of environmentally sensitive lands, site gradient, and geologic hazard category of the site as shown on the "City of San Diego Seismic Safety Study, Geologic Hazards and Faults" maps. If a required report identifies geologic or geotechnical hazards, the reports must provide recommendations to reduce the hazards to an acceptable level and the recommendations must be incorporated into the project design.

With adherence to the SDMC and the CBC, impacts related to ground failure and liquefaction would be reduced to an acceptable level of risk, which is considered less than significant.

b. Landslides and Mudslides

Subsequent projects contemplated by the <u>MPU-Plans</u> such as new trail alignments may require ground-disturbing activities within landslide susceptible formations. Additionally, continued use of eroding trails by trail users could exacerbate landslide susceptibility. Landslides involving the Friars Formation have occurred in recent years on slopes south of Mission Gorge Road. Quaternary age landslide deposits also occur on the eastern slopes of the ridges west of the Fortuna Mountain and

adjacent to the river on the western portion of the property, northwest of the Visitor's Center. However, various MPU recommendations would aim to minimize landslide susceptibility by stabilizing and/or closing existing unauthorized trails. For example, MPU Recommendations FM-R34 and FM-R35 recommend closing and restoring old utility access roads that are no longer used, extremely steep, and eroding. These MPU recommendations would generally serve to reduce Park user encroachment into landslide susceptible areas by closing and restoring steep and eroding trails.

For example, as discussed in the MPU, recommendations pertaining to trails are in one of three categories: closures, reroutes, and new construction. Trail closures are primarily where the existing system is redundant or has been created through unauthorized construction activities. Potential trail reroutes are identified where the existing trail is very steep, showing signs of erosion, or too close to sensitive species or habitats. Overall, trail closures and reroutes would generally reduce potential ground disturbance in potentially landslide susceptible areas and result in ground stabilization compared to the existing condition. Construction of new trails is also proposed in some areas; however, consistent with the MPU Recreation Recommendation #1, all trails would be required to comply with the City's current Trail Policies and Standards per the current City of San Diego Consultants Guide to Park Design and Development for all new and rerouted trails and would utilize other state and national sustainable trail guidelines as supplements to the City's Standards. Future trail construction would also require a subsequent environmental review before they could be fully implemented. Thus, with implementation of the MPU recommendations, trail siting guidelines, and requirement for future environmental review for construction of trails, impacts related to landslides associated with new trail construction would be less than significant.

c. Rockfall

Rockfall can occur wherever boulders or rock outcrops are exposed on steep slopes or cliffs. These hazards currently exist in the Park; however, the introduction of additional recreational facilities contemplated by the MPU-Plans in new areas within the Park could expose people to rockfall hazards. For example, Recommendation FM-R10 for the Fortuna Mountain area (see Figure 3-7a) states to "Provide rock climbing access to the eastern face of South Fortuna by constructing a new hiking loop trail from the existing South Fortuna trail. Planning and design of this trail will need to address proximity to bat/raptor roosts, safety concerns relative to falling rocks, and emergency response concerns that include improvements to vehicular access to the area and/or the designation of a helicopter landing area." However, as discussed above, all new trails would require a subsequent environmental review before they could be fully implemented. This review would ensure any potential geologic hazards, including potential rockfall hazards, are avoided by appropriate trail siting. Future trails would be required to comply with the City's current Trail Policies and Standards per the current City of San Diego Consultants Guide to Park Design and Development and would utilize other state and national sustainable trail guidelines as supplements to the City's Standards (MPU Recreation Recommendation #1). Thus, with implementation of the MPU recommendations, trail siting guidelines, and requirement for future environmental review for construction of trails, impacts related to rockfall would be less than significant.

Issue 2: Erosion

Would implementation of the Plans and associated discretionary actions increase the potential for erosion of soils on- or off-site?

Implementation of the NRMP would not result in erosion on- or off-site as it specifies management actions related to the protection of sensitive biological resources and any ground disturbance would be managed consistent with NRMP and MPU recommendations to prevent erosion, as discussed below. Soils throughout the study area are susceptible to erosion. Highly erosive Cieneba soils occur on the north slope of Cowles Mountain and the western slope of Fortuna ridgeline. Friant soils with a moderate to high erosion hazard occur on the west side of Lake Murray, south of the river and west of the visitor center, on the north slope of Kwaay Paay, and the northern and eastern slopes of North and South Fortuna Mountain.

There are numerous existing trails located on steep, eroding slopes that are contributing to existing erosion issues within the study area. Various MPU recommendations are intended to improve these issues. For example, MPU Recommendation FM-R7 states: "Assess a section of hike/bike trail for localized improvements to address steepness and erosion issues, and potential conflicts with San Diego thornmint habitat. Reroute this section of trail if localized improvements are inadequate or infeasible. Install wildlife compatible fencing and signage adjacent to the existing and potential San Diego thornmint habitat." MPU Recommendation FM-R20 states: "Close and restore sections of redundant park access road, steep and eroding access road, and existing hike/bike trails within Shepherd Canyon." Additionally, Recommendations FM-R34 and FM-R35, discussed above, and several other recommendations would address erosion issues.

While these recommendations generally intend to improve erosion in the study area, other subsequent projects implemented in accordance with the MPU-Plans such as construction of new trails and associated amenities could result in soil erosion and loss of topsoil. These and other potential subsequent projects that require ground disturbance would have the potential to disturb soils and increase the potential for erosion. Additionally, minimal grading activity may be required to construct the proposed parking areas, which would have the potential to disrupt soil profiles, resulting in an increased exposure of soils to wind and rain, which are erosive forces.

As discussed in the MPU, recommendations pertaining to trails are in one of three categories: closures, reroutes, and new construction. Trail closures are primarily where the existing system is redundant or has been created through unauthorized construction activities. Potential trail reroutes are identified where the existing trail is very steep, showing signs of erosion, or too close to sensitive species or habitats. Overall, trail closures and reroutes would generally reduce potential ground disturbance and erosion and result in ground stabilization compared to the existing condition. Construction of new trails is also proposed in some areas; however, consistent with the MPU Recreation Recommendation #1, all trails would be required to comply with the City's current Trail Policies and Standards per the current City of San Diego Consultants Guide to Park Design and Development for all new and rerouted trails and would utilize other state and national sustainable trail guidelines as supplements to the City's Standards.

Future trail construction would also require a subsequent environmental review before they could be fully implemented and would be subject to compliance with requirements in the SDMC that require erosion control measures to be implemented during grading and development.

All subsequent projects implemented in accordance with the MPU-Plans would be required to adhere to the Grading Regulations and National Pollutant Discharge Elimination System (NPDES) permit requirements which would avoid potentially significant erosion impacts. SDMC Section 142.0146 requires all grading work to incorporate erosion and siltation control measures in accordance with Chapter 14, Article 2, Division 4 (Landscape Regulations) and the standards established in the Land Development Manual. The regulations prohibit sediment and pollutants from leaving the work site and requires the property owner to implement and maintain temporary and permanent erosion, sedimentation, and water pollution control measures. Controls shall include measures outlined in Chapter 14, Article 2, Division 2 (Storm Water Runoff Control and Drainage Regulations) that address potential erosion and sedimentation impacts. Furthermore, any future projects involving clearing, grading, or excavation that causes soil disturbance of one or more acres, or any project involving less than one acre that is part of a larger development plan, shall be subject to NPDES General Construction Storm Water Permit provisions. Additionally, any development of this significant size within the City shall be required to prepare and comply with an approved storm water pollution prevention plan (SWPPP) that shall consider the full range of erosion control best management practices such as, but not limited to, any additional site-specific and seasonal conditions. Project compliance with NPDES requirements would significantly reduce the potential for substantial erosion or topsoil loss to occur in association with new development. Thus, with implementation of the existing regulatory framework, impacts related to erosion would be less than significant.

5.9.5 Significance of Impacts

Issue 1: Geologic Hazards

Subsequent projects implemented in accordance with the MPU Plans have the potential to result in significant impacts related to geologic hazards. Future structures and improvements implemented in accordance with the MPU would have the potential to be subject to unstable conditions relating to seismicity (faults), liquefaction, landslides, and rockfall. The potential impacts associated with subsequent projects would be evaluated at a project level when detailed plans and grading quantities are known. Adherence to the SDMC and the CBC would reduce impacts related to geologic hazards to an acceptable level of risk, which is considered less than significant from a CEQA perspective.

Issue 2: Erosion

Subsequent projects implemented in accordance with the MPU-Plans have the potential to result in significant impacts related to increasing the potential for on- or off-site erosion. Based on the steep slopes and highly erosive and poorly consolidated soils within portions of the study area, erosion would represent a potentially significant impact. Future projects implemented in accordance with the MPU-Plans would require site-specific evaluation to ensure erosion is minimized to the

maximum extent practicable. Adherence to the SDMC, Grading Regulations, and NPDES permit requirements ensures impacts related to erosion would be less than significant.

5.9.6 Mitigation Framework

All impacts would be less than significant; thus, mitigation is not required.

5.10 Paleontological Resources

This section analyzes the potential impacts to paleontological resources due to implementation of the Master Plan Update (MPU) and Natural Resources Management Plan (NRMP) (collectively, the Plans for the Mission Trails Regional Park-Park. These resources are commonly referred to as fossils, which are the remains and/or traces of prehistoric animal and plant life exclusive of human remains or artifacts. The following analysis is based on the Paleontological Resource Assessment prepared for the Project (Appendix G). The section also discusses applicable regulations to subsequent projects contemplated by the Plans, and the existing geological formations within the study area that have the potential to contain paleontological resources.

5.10.1 Regulatory Framework

A number of federal statutes (e.g., Antiquities Act of 1906 [16 United States Code (USC) 431-433] and Federal-Aid Highway Act of 1935 [20 USC 78]) specifically address paleontological resources, their treatment, and funding for mitigation as a part of federally authorized or funded projects.

Under California law, paleontological resources are protected by the California Environmental Quality Act (CEQA); the California Code, Title 14, Division 3, Chapter 1, Sections 4307 and 4309; and Public Resources Code Section 5097.5. Pursuant to Section 15065 of the CEQA Guidelines (California Code of Regulations Sections 15000–15387), a Lead Agency must find that a project would have a significant effect on the environment where the project has the potential to eliminate important examples of the major periods of California prehistory, including significant paleontological resources.

The City of San Diego's (City's) 2016 Significance Determination Thresholds <u>provides guidance for determining the potential significance of paleontological resources, and sets</u> forth grading thresholds for development projects within geological formations that have high or moderate paleontological sensitivity, as discussed further below in Section 5.910.3.

City of San Diego Municipal Code

The City's Land Development Code (San Diego Municipal Code [SDMC] Chapters 11 through 15) provides detailed development regulations which include regulations related to grading and paleontological monitoring. SDMC Section 142.0151 requires paleontological resources monitoring in accordance with the General Grading Guidelines for Paleontological Resources in the Land Development Manual for any of the following:

a) Grading that involves 1,000 cubic yards or greater, and 10 feet or greater in depth, in a High Resource Potential Geologic Deposit/Formation/Rock Unit; or

- b) Grading that involves 2,000 cubic yards or greater, and 10 feet or greater in depth, in Moderate Resource Potential Geologic Deposit/Formation/Rock Unit; or
- c) Grading on a fossil recovery site or within 100 feet of the mapped location of a fossil recovery site.

If paleontological resources are discovered during grading, all grading in the area of discovery is required to cease until a qualified paleontological monitor has observed the discovery, and the discovery has been recovered in accordance with the General Grading Guidelines for Paleontological Resources. The General Grading Guidelines for Paleontological Resources are found in Appendix P of the Land Development Manual and do not replace the Significance Determination Thresholds set forth in Land Development Manual Appendix A for Paleontological Resources.

5.10.2 Environmental Setting

5.10.2.1 Regional Paleontological History

There is a direct relationship between fossils and the geologic formations within which they are enclosed; therefore, with sufficient knowledge of the geology and stratigraphy of a particular area and the paleontological resource potential, it is possible to reasonably predict where fossils might or might not be found. This is the case in San Diego County where a general overview of the geologic setting provides a basis for reasonably predicting the location of paleontological resources.

The City is underlain by a number of distinct geologic formations that record portions of the past 450 million years of Earth's history. In general, time periods late in geologic history are better represented than periods further back in time because the younger rocks are less likely to have been eroded away or metamorphosed. In the City, the geologic record is most complete for parts of the past 75 million years, represented by the Cretaceous Period, the Eocene, Oligocene, and Pliocene Epochs of the Tertiary Period, and the Pleistocene Epoch of the Quaternary Period.

5.10.1.2 Paleontological Resource Potential

Geologic formations possess a specific paleontological resource potential wherever the formation occurs based on discoveries made elsewhere in that particular formation. To evaluate paleontological resources in the project area, the presence and distribution of geologic formations and the respective potential for paleontological resources were reviewed.

According to the paleontological resource assessment prepared for the project (Deméré and Ekdale 2011) geologic formations are rated as High, Medium, Low, or Zero paleontological resource sensitivity. A description of the ratings and the geologic formations within the project area that fall within each rating category are described below. In addition, Figures 5.10-1a and 5.10-1b provide the geographic distribution of the project's geological formations. Figure 5.10-2 provides the distribution of the paleontological resource sensitivities within the study area.

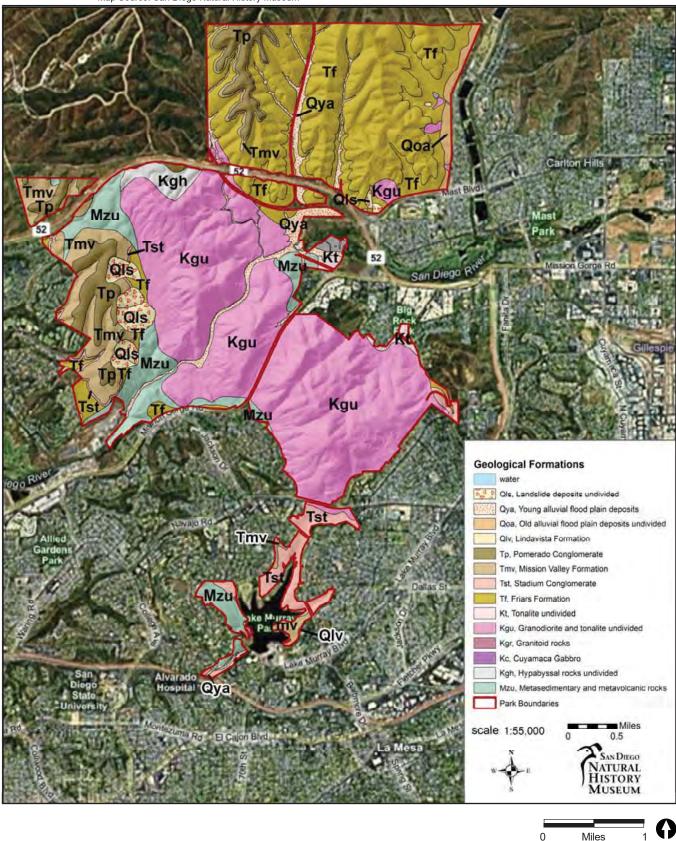


FIGURE 5.10-1a
Geologic Formations

FIGURE 5.10-1b

Miles

Map Source: San Diego Natural History Museum SCRIPPS RANCH Santee Paleontological Sensitivity high medium zero Park boundary scale 1:80,000 SAN DIEGO NATURAL HISTORY MUSEUM



0

Miles

a. High Sensitivity Formations

High sensitivity is assigned to geologic formations known to contain paleontological collecting localities with rare, well-preserved, critical fossil materials for interpretation that provide important information about the paleobiology and evolutionary history of animal and plant groups. Geologic formations within the study area with high paleontological resource sensitivity are briefly discussed below.

Friars Formation (Tf)

The Friars Formation has produced significant vertebrate fossils, including insectivores, primates, and ungulates. In addition, fossils indicative of marine paleoenvironments have been recovered from the Friars Formation, as well as fossilized leaf material. There are 27 San Diego Natural History Museum (SDNHM) fossil-collecting localities recorded from within a 1-mile radius of the study area. Two of these localities were discovered within the western portion of the study area along Fortuna Saddle Trail.

Stadium Conglomerate (Tst)

The Stadium Conglomerate formation has produced fossils of plants and occasional well-preserved skeletal remains of insectivores, primates, rhinoceroses, and artiodactyls. Although the Stadium Conglomerate has produced numerous scientifically significant fossils, there are no recorded SDNHM fossil-collecting localities from within 1 mile of the study area.

Mission Valley Formation (Tmv)

The Mission Valley Formation has produced well-preserved fossils of sea urchins, sharks, rays, and bony fish in addition to a diverse assemblage of terrestrial mammals, including bats, primates, artiodactyls, and perissodactyls. Fossils of many of these organisms have been recovered from 13 SDNHM fossil-collecting localities within 1 mile of the study area, one of which was discovered along the Fortuna Saddle Trail within the study area.

Pomerado Conglomerate (Tp)

The Pomerado Conglomerate has produced abundant terrestrial mammal fossils, such as primates, artiodactyls, marine clams/snails, and *Miacis*, an extinct carnivorous mammal. One SDNHM fossil locality was discovered in the Pomerado Conglomerate along a portion of SR-52 adjacent to the western side of the study area.

b. Moderate Sensitivity Formations

While the paleontological assessment prepared for the Project (see Appendix G) refers to "medium" paleontological sensitivity, the City's 2016 Significance Determination Thresholds refers to a "moderate" sensitivity category. These categories are equivalent, and "moderate" will be used throughout this section. Moderate sensitivity is assigned to geologic formations known to contain paleontological-collecting localities with poorly preserved, common elsewhere, or stratigraphically

unimportant fossil material. It is also applied to geologic formations that are judged to have a strong, but unproven potential for producing important fossil remains, as discussed below.

Lindavista Formation (Qlv)

Fossil-collecting localities are rare within the Lindavista Formation and have only been recorded from a few areas (e.g., Tierrasanta and Mira Mesa), consisting of remains of nearshore marine invertebrates and sparse remains of sharks and baleen whales. One fossil-collecting locality was discovered in this formation within 1 mile of the study area in Tierrasanta.

Undivided Old Alluvial Floodplain Deposits (Qoa)

These unnamed river terrace deposits represent the courses of prehistoric rivers. Diverse assemblages of "Ice Age" mammals—such as ground sloths, insectivores, wolves, camels, mastodons, and mammoths—have been recovered in San Diego County within this formation.

Undivided Landslide Deposits (Qls)

Sediments deposited as the result of landslides that occurred during the Quaternary Period are common occurrences in southern California. Although the landslides occurred relatively recently, the transported sediment may be significantly older based on the age of original deposition. Landslide deposits occur within the study area on the eastern slopes of the ridges west of the Fortuna Mountains. These deposits likely contain a mixture of rocks from the Pomerado Conglomerate, Mission Valley Formation, Stadium Conglomerate, and Friars Formation. If a landslide occurs, deposits likely would contain fossils. Fossil remains have been recovered from the strata that contribute sediments to the landslide deposits.

c. Low and Zero Sensitivity Formations

Low sensitivity is assigned to young alluvial floodplain deposits (Qya), as they are judged unlikely to produce important fossil remains. These surficial sedimentary deposits are generally considered to have little potential to yield scientifically significant fossils. However, on occasion deeper excavations into sedimentary deposits mapped as younger alluvium do yield fossils. Zero sensitivity is assigned to geologic formations that are entirely igneous in origin (i.e., plutonic, volcanic), and therefore, have no potential for producing fossil remains. Artificial fill materials are also assigned a paleontological resource sensitivity of zero. Such formations within the study area include limited exposures of artificial fill and more extensive outcrops of igneous and metamorphic rocks.

5.10.3 Significance Determination Thresholds

Based on the City's 2016 Significance Determination Thresholds, impacts related to paleontological resources would be significant if implementation of the Plans and associated discretionary actions would:

1. Allow development to occur that could significantly impact a unique paleontological resource or a geologic formation possessing a moderate to high fossil-bearing potential.

5.10.4 Impact Analysis

Issue 1: Paleontological Resources

Would implementation of the Plans and associated discretionary actions allow development to occur that could significantly impact a unique paleontological resource or a geologic formation possessing a moderate to high fossil-bearing potential?

According to the City's Significance Determination Thresholds, impacts related to paleontological resources are significant if future subsequent projects implemented in accordance with the Plans are located where there are formations with medium to high sensitivity fossil-bearing potential and would require:

- Over 1,000 cubic yards of excavation in a high resource potential geologic deposit/formation/rock unit; or
- Over 2,000 cubic yards of excavation in a moderate resource potential geologic deposit/formation/rock unit; at a depth of 10 feet or more; or
- Require excavation or grading in areas where medium to high sensitivity formations are exposed at the surface or within close proximity to mapped fossil localities.

As discussed in Chapter 3, Project Description, implementation of the Plans would not allow specific development at this time. The Plans have been developed as an integrated set of management guidelines for the Park, with the MPU focusing on public access and recreation and the NRMP focusing on sensitive biological resources. The NRMP would have no impact with regards to paleontological resources, as the management actions would not require significant amounts of excavation. No impact would occur. The MPU is analyzed below.

Based on the existence of geologic formations with a moderate and high potential to contain fossil remains, the potential exists that subsequent projects implemented in accordance with the MPU Plans that involve grading and excavation could significantly impact a paleontological resource.

A paleontological records search conducted at the SDNHM identified 50 discrete fossil-collecting localities within the vicinity of the study area; however, a majority of fossil discoveries have been found near the study area, but not within it. The reason most fossil localities do not originate from within the study area boundaries is because most fossils recorded from this region were discovered during monitoring of excavation activities associated with development activities. As the study area is primarily retained in its natural state and has been subject to limited grading and excavation compared to the surrounding developed areas, there have been limited fossil discoveries within its boundaries. While there are geologic formations within the Park with the potential for fossil discoveries, they remain buried and inaccessible, unless exposed by construction-related excavations.

Direct impacts to paleontological resources occur when earthwork activities cut into the geologic deposits (formations) within which fossils are buried and fossil remains are destroyed during

grading and/or excavation. Since fossils are the remains of prehistoric animal and plant life, they are considered to be nonrenewable, important scientifically, and significant under CEQA. The most sensitive areas for paleontological resources occur in the East Elliott and West Sycamore areas north of SR-52, as well as along the western section of the study area (see Figure 5.10--2).

Various MPU recommendations identify subsequent projects that could result in excavation and grading within these areas. For example, MPU recommendation WS-F1 states: "Provide a restroom, ranger office, hitching posts, shade structure, and picnic tables at the West Sycamore staging area." These types of projects would involve some level of grading, excavation, and/or construction that have the potential to damage or destroy buried paleontological resources.

The detailed information regarding the location, depth, and volume of grading required to implement subsequent projects in accordance with the MPU-Plans is not available at this level of analysis. It can be assumed that a certain amount of disturbance to the native bedrock within the study area has the potential to impact fossil_resources preserved in high and medium_moderate resource—potential sensitivity geological formations. The potential impacts associated with implementation of the MPU-Plans would be evaluated at a project level when detailed plans and grading quantities are known. As the specific impacts are not known at this time, impacts would be considered significant (Impact PALEO-1), and mitigation is required. However, subsequent to distribution of the Draft PEIR, an amendment was made to Chapter 14: General Regulations of the San Diego Municipal Code (SDMC) adding Section 142.0151 - Paleontological Resources Requirements for Grading Activities that applies to all projects which involve grading that could affect paleontological resources.

5.10.5 Significance of Impacts

Subsequent projects implemented in accordance with the Plans and associated discretionary actions would—have the potential to result in significant impacts to paleontological resources if they exceed the excavation and depth thresholds of significance, or involve substantial grading within any of the formations with a moderate or high resource sensitivity rating. Pursuant to SDMC Section 142.0151, all future development would be required to screen for grading quantities and geologic formation sensitivity and apply appropriate requirements for paleontological monitoring. Regulatory compliance for future discretionary projects reviewed in accordance with CEQA would be assured through permit conditions, when applicable or as notes on plans, and would be adequate to preclude impacts to paleontological resources.

Implementation of the General Grading Guidelines for Paleontological Resources, as required by the SDMC Section 142.0151, would ensure that impacts to Paleontological Resources would be less than significant.

Therefore, impacts would be significant (Impact PALEO-1), and mitigation is required.

5.10.6 Mitigation Framework

Impacts would be less than significant; and therefore, mitigation is not required.

If future implementation of the Plans would result in subsurface disturbance activities, the following mitigation framework would be implemented to minimize potential impacts through development of a project-specific paleontological monitoring program. If no subsurface disturbance is planned, then the paleontological resources would not be impacted and development of project-specific paleontological monitoring would not be necessary. The following Mitigation Framework would be required to mitigate for Impact PALEO-1.

MM-PALEO-1: Prior to Project Approval:

- A. The environmental analyst shall complete a project-level analysis of potential impacts on paleontological resources. The analysis shall include a review of the applicable U.S. Geological Survey Quad maps to identify the underlying geologic formations, and shall determine if construction of a project would:
 - Require over 1,000 cubic yards of excavation and/or a 10-foot, or greater, depth in a high resource potential geologic deposit/formation/rock unit.
 - Require over 2,000 cubic yards of excavation and/or a 10-foot, or greater, depth in a moderate resource potential geologic deposit/formation/rock unit.
 - Require construction within a known fossil location or fossil recovery site.

Resource potential within a formation is based on the Paleontological Monitoring Determination Matrix (City of San Diego 2016).

- B. If construction of a project would occur within a formation with a moderate to high resource potential, monitoring during construction would be required.
 - Monitoring is always required when grading on a fossil recovery site or a known fossil location.
 - Monitoring may also be needed at shallower depths if fossil resources are present or likely to be present after review of source materials or consultation with an expert in fossil resources (e.g., the SDNHM).
 - Monitoring may be required for shallow grading (less than 10 feet) when

 a site has previously been graded and/or unweathered geologic
 deposits/formations/rock units are present at the surface.
 - Monitoring is not required when grading documented artificial fill.

When it has been determined that a future project has the potential to impact a geologic formation with a high or moderate fossil sensitivity rating a paleontological Mitigation Monitoring and Reporting Program shall be implemented during construction grading activities.

5.10.7 Significance after Mitigation

Although implementation of the Plans and associated discretionary actions would have the potential to result in significant impacts to paleontological resources, subsequent projects exceeding the grading thresholds in high or moderate paleontological resource formations would be required to implement MM-PALEO-1 during construction-related activities. The Mitigation Framework requires site-specific environmental review, analysis of potential impacts, and recommendations for mitigation to reduce significant impacts to below a level of significance.

5.11 Transportation/Circulation

This section analyzes the potential transportation-related impacts associated with implementation of the Master Plan Update (MPU) and Natural Resources Management Plan (NRMP) (collectively, the Plans for the Mission Trails Regional Park-Park. The analysis in this section is partially based on the traffic and parking technical study (Appendix H) and also on information within the MPU. This section also discusses the regulations applicable to the Plans, existing circulation and access routes within the study area, parking, and alternative transportation routes.

5.11.1 Regulatory Framework

There are no applicable federal or state regulations to transportation. Local regulations are detailed below.

5.11.1.1 Regional Transportation Plan

The San Diego Association of Governments' (SANDAG's) 2050 Regional Transportation Plan (RTP; adopted in October 2011) is the long-range mobility plan for the region. It includes short-term and long-term strategies for the development of an integrated multi-modal transportation system, and is required in order to be eligible for state and federal funding. The RTP identifies and prioritizes projects, and calls out funding sources for their implementation. The plan addresses improvements to transit, rail, roadways, goods movement, bicycling, and walking, as well as other topics. In October of 2015, SANDAG adopted San Diego Forward, the combination and update of the Regional Comprehensive Plan for the San Diego Region and the 2050 Regional Transportation Plan/Sustainable Communities Strategy into one plan.

5.11.1.2 General Plan

The Mobility Element of the City of San Diego's (City's) General Plan defines policies regarding traffic flow and transportation facility design. The purpose of the Mobility Element is "to improve mobility through development of a balanced, multi-modal transportation network." The main goals of the Mobility Element pertain to walkable communities, transit first, street and freeway system, intelligent transportation systems (ITS), Transportation Demand Management (TDM), bicycling, parking management, airports, passenger rail, goods movement/freight, and regional transportation coordination and financing.

5.11.1.3 Pedestrian Master Plan

Per the City's Pedestrian Master Plan (December 2006), pedestrian facilities can be classified into the following seven categories.

Route Type 1—District Sidewalks are walks along roads that support heavy pedestrian levels in mixed-use concentrated urban areas.

Route Type 2—Corridor Sidewalks are walks along roads that support moderate density business and shopping districts with moderate pedestrian levels. They range from wide walks along boulevards to small walks along a heavily auto-oriented roadway.

Route Type 3—Connector Sidewalks tend to have low pedestrian levels and are along roads with moderate to high average vehicular traffic. Connector sidewalks tend to be long and generally do not have accessible land uses directly adjacent to the sidewalk.

Route Type 4—Neighborhood Sidewalks are walks along roads that support low to moderate density housing with low to moderate pedestrian levels. Neighborhood streets and their associated walkways are generally lower volume streets, with low to moderate widths, single lanes, and posted or prima facie speed limits of 25 miles per hour (mph).

Route Type 5—Ancillary Pedestrian Facilities are facilities away from or crossing over streets such as plazas, paseos, promenades, courtyards, or pedestrian bridges and stairways. The MPU recommendation MG-R4 would provide for an all-weather suspension or truss pedestrian and bicycle bridge across the San Diego River near the San Diego River Crossing trail.

Route Type 6—Paths are paved facilities with exclusive right-of-ways that act as corridors and have little or no vehicular cross flows. Many of these paths are exclusive to pedestrians and bicycles and are not associated with streets.

Route Type 7—Trails are separated from roads and support activities such as hiking, biking, and walking primarily through parks and open space. They differ from paths in that they are not paved with concrete or asphalt. A large portion of the MPU Recommendations pertains to recreational trails.

5.11.1.4 Bicycle Master Plan

The City's Bicycle Master Plan (City of San Diego 2013b) seeks to foster a bicycle-friendly environment to serve commuter and recreational riders. The plan identifies policies, routes, programs, and facility priorities to increase bicycle transportation, safety, access, and quality of life. Similar to improved pedestrian environments and routes, improved bicycle routes can increase ridership, which provides community and regional benefits (reduced traffic congestion, energy consumption, vehicle emissions, etc.). Approximately 54 miles of the Park's official trail system are designated for hiking and bicycle use. The Deerfield Bike Skills Area, located in the southern portion of the Mission Gorge area, contains jumps and trails used by the BMX community.

5.11.2 Environmental Setting

5.11.2.1 Circulation and Access

The study area contains approximately 72 miles of roads, with paved roads totaling less than nine miles. Only approximately 5 miles of paved roads are accessible to the public. Public vehicular access is typically limited to the perimeter roads, with the exception of northbound vehicular traffic on the Father Junipero Serra Trail. Approximately 64 miles of unpaved roads make up the majority of the park roads, with 40.67 of those miles being related to unpaved utility roads maintained by San Diego Gas & Electric (SDG&E) and San Diego County Water Authority (SDCWA). The remaining approximately 23 miles of unpaved roads are Park access roads used by rangers and emergency vehicles.

Paved, publicly accessible roads include the Lake Murray entrance road from Kiowa Drive to the parking area; the entrance to Lake Murray Community Park and tennis courts, the maintenance road around Lake Murray, the Father Junipero Serra Trail between the Visitor and Interpretive Center and Kumeyaay Lake Campground, and roads within the Kumeyaay Lake Campground and East Fortuna Staging Area. Table 5.11-1 summarizes the types of roads within the study area.

Table 5.11-1 Existing Vehicular Circulation			
Туре	Miles	Percent	
Roads			
Paved Park Road	4.61	3.71	
Paved Maintenance Road	3.92	3.16	
Unpaved Park Road	22.98	18.52	
Unpaved Utility Road	40.67	32.78	
Subtotal (Roads)	72.18	58.17	
Trails	51.90	41.83	
TOTAL	124.08	100	

There are four access points into the Lake Murray area (Figure 5.11-1). Primary access is from Kiowa Drive. The Baltimore Drive access point is for utility vehicles only, but provides a pedestrian gate for community entry. The Belle Glade Avenue entry from Murray Park Drive serves the community park on the northwest side of the lake. An entrance at Murray Park Drive and Park Ridge Boulevard serves the tennis courts. Two additional entrances provide access to the golf course, one off Navajo Road and the other off Golfcrest Drive. The approximately 14 miles of circulation routes within the Lake Murray area are dominated by paved and unpaved maintenance roads (11.28 miles), most of which double as public recreational access. The maintenance roads provide access to both the shoreline of Lake Murray and the urban runoff diversion system that encompasses much of the reservoir.

There are four entries to the Cowles Mountain area (Figure 5.11-2). The major entry is the Cowles Mountain staging area at the intersection of Golfcrest Drive and Navajo Road in the San Carlos neighborhood in the Navajo Community Planning Area. A second entry is located at Barker Way, within a residential neighborhood.



FIGURE 5.11-1
Lake Murray Vehicular Circulation and Parking

1500

FIGURE 5.11-2
Cowles Mountain Vehicular Circulation and Parking

There are two entries from the Santee side of the mountain, one at Big Rock Park and the second at the end of Mesa Road. The Cowles Mountain area has publicly accessible park roads only on its perimeter, with interior utility and emergency access provided from Barker Way to the summit. As such, only 2.26 miles of the approximately 15 miles of circulation routes within the area are for vehicular use.

The Mission Gorge area is accessed from four locations: San Diego River crossing staging area; Visitor and Interpretive Center; Old Mission Dam; and Kumeyaay Lake Campground (Figure 5.11-3). Of the 14.37 miles of circulation routes within this area, 7.51 miles are used for vehicular access. One lane of Father Junipero Serra Trail is used as a Class 1 Bike Path by cyclists, pedestrians, and skaters, and the other lane is used for one-way vehicular traffic going north toward Santee.

The Fortuna Mountain area is accessed from one of two staging areas: the East Fortuna Staging Area or the Clairemont Mesa Boulevard staging area (Figure 5.11-4). Of the 34.12 miles of circulation routes within the area, 23.78 miles are associated with vehicular access. The limited paved roads within this area are associated with the two staging areas. There are also 14 miles of unpaved utility roads that crisscross the area as they follow SDCWA pipelines or SDG&E gas mains and electrical transmission lines. There are an additional 8 miles of unpaved park roads utilized by rangers and emergency vehicles. All of these access roads are used by the public for non-vehicular recreational access and often provide the only connectivity between major areas (e.g., San Diego River Crossing and Fortuna Saddle).

There are no dedicated vehicular entrances into the East Elliott area (Figure 5.11-5). Access is provided from the Fortuna Mountain area via two SR-52 underpasses. Of the approximately 37 miles of circulation routes within the area, only approximately 21 miles are associated with vehicular access. The private access road for the landfill is the only paved road within the area. There are also approximately 11 miles of unpaved utility access roads.

The West Sycamore area is accessed from the Stonebridge staging area (Figure 5.11-6). The gate at the staging area is open daily from 8 a.m. to 5 p.m. from November through February, and 8 a.m. to 7 p.m. from March through October. Of the 9.26 miles of circulation routes, 6.39 miles are utilized for vehicular access. The entrance road is the only paved road within this area. There are also nearly 6 miles of unpaved utility and park access roads within this area.

5.11.2.2 Parking

Several off-street parking areas are located within the Park. Due to heavy Park use, parking areas fill quickly and on-street parking within residential areas is common.

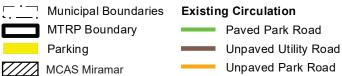


FIGURE 5.11-3 Mission Gorge Vehicular Circulation and Parking

FIGURE 5.11-4
Fortuna Mountain Vehicular Circulation and Parking

FIGURE 5.11-5
East Elliott Vehicular Circulation

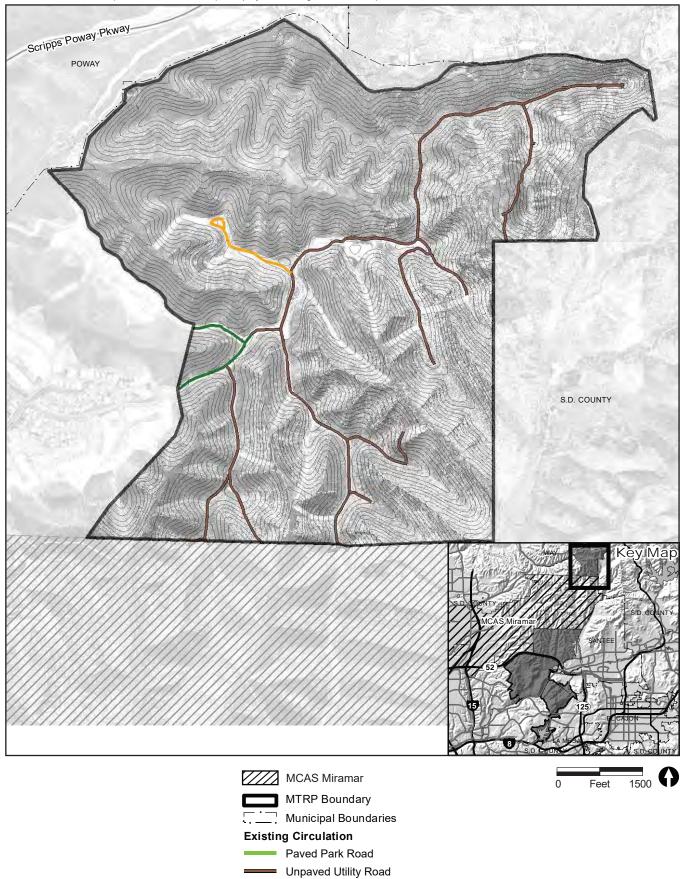


FIGURE 5.11-6
West Sycamore Vehicular Circulation

Unpaved Park Road

In the Lake Murray area, off-street parking is located at the end of Kiowa Drive, at the Lake Murray Tennis Courts, and at the Lake Murray Community Park. On-street parking is available along Kiowa Drive, Baltimore Drive, and Murray Park Drive. Parking for the golf course is along Navajo Road and off Golfcrest Place (see Figure 5.11-1).

Within the Cowles Mountain area, the main entry at Golfcrest Drive and Navajo Road provides parking for 25 vehicles. The secondary access point at Barker Way provides limited on-street parking within a residential neighborhood. The three entries from the Santee side of the mountain located at Big Rock Park, at the end of Big Rock Road, and at the end of Mesa Road also provide limited on-street parking (see Figure 5.11-2).

Within the Mission Gorge area, off-street parking is provided at the San Diego River crossing staging area, the Visitor and Interpretive Center, Old Mission Dam, Kumeyaay Lake Campground, and the parking area at Bushy Hill Drive (see Figure 5.11-3). On street parking is provided along Father Junipero Serra Trail outside the park gates and limited parking is allowed within the park where the dirt shoulder is wide enough. During periods of peak park usage, the parking at the Visitor and Interpretive Center, along Father Junipero Serra Trail, and at the San Diego River crossing staging area is inadequate causing visitors to begin parking in the residential neighborhoods south of Mission Gorge Road.

Parking within the Fortuna Mountain area is provided at the two staging areas at Clairemont Mesa Boulevard and the East Fortuna Staging Area (see Figure 5.11-4). Both areas provide off-street parking. In addition, limited on-street parking is provided along the equestrian circle outside the park gates at the East Fortuna Staging Area. On-street parking is available at the end of Clairemont Mesa Boulevard and along several residential streets near the various community access points within Tierrasanta.

Within the East Elliott area there are no dedicated parking areas. The East Fortuna Staging Area in the Fortuna Mountain area currently provides the closest public parking and staging area for East Elliott access.

In the West Sycamore area, off-street parking is provided at the Stonebridge staging area at the end of Stonebridge Parkway in the western portion of the area, east of the Rancho Encantada community. Additional parking and access is available from the staging area for Goodan Ranch Sycamore Canyon Preserve at the end of Sycamore Canyon Road.

5.11.2.3 Public Transportation

No transit services are available along Mission Gorge Road, serving the main Park entrance at the Visitor and Interpretive Center in the Mission Gorge area. Limited transit services are provided within the study area or on roadways serving the Park. Within the Lake Murray area, Metropolitan Transit System (MTS) Route 115 traverses Jackson Drive between the Lake Murray and Cowles Mountain areas, with the nearest stop located approximately one-quarter mile south of the Cowles Mountain staging area at Navajo Road and Golfcrest Drive. From Santee, MTS Route 834 provides transit service to Big Rock Park, a secondary access point to the Cowles Mountain area.

5.11.3 Significance Determination Thresholds

Based on the City's 2016 Significance Determination Thresholds impacts related to traffic and circulation would be significant if implementation of the Plans and associated discretionary actions would:

- 1. Result in an increase in projected traffic that is substantial in relation to the capacity of existing circulation system;
- 2. Create alterations to present circulation movements in the area including effects on existing public access points;
- 3. Impact the availability of parking; and
- 4. Conflict with the adopted policies, plans, or programs supporting alternative transportation modes (e.g., bus turnouts, trolley extensions, bicycle lanes, bicycle racks, etc.).

5.11.4 Impact Analysis

Issue 1: Capacity

Would implementation of the Plans and associated discretionary actions result in an increase in projected traffic that is substantial in relation to the capacity of the circulation system?

The NRMP would have no impact with regards to generating traffic, as management actions such as hand weeding, exclusionary fencing, and erosion control would not generate traffic or require a noticeable increase in Park personnel that would increase traffic on area roads. The MPU is analyzed below.

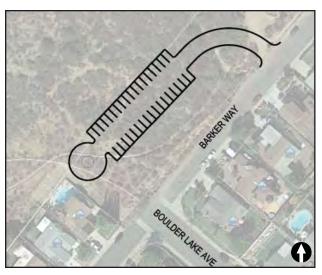
As discussed in Chapter 3, Project Description, the MPU does not propose specific development at this time. It does, however, identify recreational amenities (e.g., shade structures, benches, picnic areas, trail improvements) and parking areas as subsequent projects that could attract and accommodate additional visitors to the Park. While new recreational amenities such as park benches, restrooms, trail construction and shade structures would improve the Park and could attract more visitors to the Park, any increase in Park use would likely occur with or without these improvements, based on regional population growth and increasing demand for park space.

As a result, the focus of this analysis is on the additional parking facilities recommended in the MPU, as these facilities <u>maywould</u> accommodate <u>additional visitorsoverflow parking demand that currently spills over into residential streets</u> and <u>couldmay</u> have a noticeable effect on traffic volumes surrounding these facilities. Figure 5.11-7 identifies the location of the four recommended parking areas and Figure 5.11-8 shows the configuration of the recommended parking areas. The anticipated impacts of each of the proposed parking facilities are discussed below.

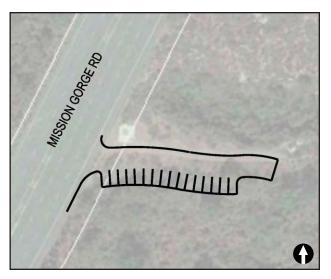




FIGURE 5.11-7
Recommended Parking Locations



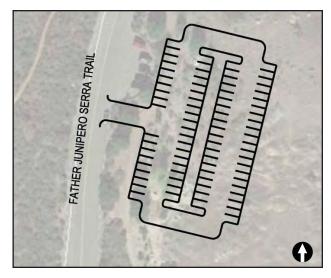
Barker Way Parking (CM-F1)



Mission Gorge Road Parking at SDCWA Pipeline Access (CM-F2)



Mesa Road Parking Improvements and Bike Skills Area in the City of Santee (CM-F3)



Father Junipero Serra Trail Parking (MG-F6)

FIGURE 5.11-8
Conceptual Parking Area Configurations

a. Barker Way

MPU Recommendation CM-F1 identifies an off-street gravel or decomposed granite surfaced parking area at the southeast boundary of the Cowles Mountain area, on the west side of Barker Way between Boulder Lake Avenue and Coleshill Drive. Barker Way in this area is a paved, two-lane, City of San Diego residential street with full improvements (sidewalks, curbs and gutters) on the eastern side, adjacent to residences. Street width varies from approximately 30 feet down to approximately 24 feet.

Traffic volumes on Barker Way were measured as 310 average daily traffic (ADT) on a weekday and 730 ADT on a weekend. These volumes are consistent with the roadway classification "single loaded residential street" which is meant to carry no more than 1,500 vehicles per day. For purposes of this analysis, it is assumed that the Barker Way parking area would accommodate 36 vehicles. The addition of a 36-vehicle parking area would potentially add four to eight times that amount of vehicle trips per day, or up to 288 ADT. This assumes every space turns over four times during the day and each parked vehicle returns the same way they came in, representing one trip in and one trip out for a total of two daily trips per vehicle. During the peak hour it is assumed that a maximum of 36 peak hour trips would be generated based on all 36 spaces being used and the typical visitor spending at least one hour at the park.

The addition of up to 288 additional ADT and up to 36 hourly trips during the peak-hour are below the City's threshold for requiring further analysis of traffic impacts. In addition, the projected traffic volumes do not account for existing trips to and from the Barker Way trailhead; therefore, actual trip generation would be less. Due to the projected trips being below the City's threshold for further traffic analysis and because the parking area would primarily accommodate existing Park traffic rather than generate it, the Barker Way parking area is not expected to result in an increase in projected traffic that is substantial in relation to the capacity of existing circulation system.

b. Mission Gorge Road

MPU Recommendation CM-F2 would provide an off-street parking area within the Cowles Mountain area, just north of and uphill from Golfcrest Drive off Mission Gorge Road adjacent to the SDCWA pipeline access portal. This area provides northerly access to the Pyles Peak trail and a potential rock climbing area. Access from Mission Gorge Road would be a right turn in and right turn out only.

Mission Gorge Road functions as a four-lane major arterial roadway with relatively few local access points between Jackson Drive and the Santee City limits to the east. Typically the roadway has six lanes, three in each direction, with some exceptions in downhill portions where there are sometimes two lanes in one direction. The directional traffic volume on this portion of Mission Gorge Road in early 2014 was measured at 11,340 ADT going eastbound during weekdays. On weekends, traffic volume drops to 8,440 ADT eastbound. This volume is consistent with the City's classification for a four-lane major road.

For purposes of this analysis, it is assumed that 16 vehicles would be accommodated at this site. Assuming all 16 vehicle spaces turn over four times a day, this represents up to 64 additional vehicles traveling on eastbound Mission Gorge Road. If all of these trips make a U-turn and return in

the westbound direction to access the parking area, a total of 128 vehicles are added to the roadway each day. In the peak hour, it is assumed that 16 vehicles maximum would arrive or depart in an hour since the average visit is expected to last more than one hour.

The estimated trip generation of 128 ADT and 16 hourly trips during the peak hour on Mission Gorge Road is below the City's threshold for requiring further analysis of traffic impacts. As the trips are below the City's threshold, it is unlikely that these trips would result in any noticeable delay on area roads, or exceed any established level of service (LOS) standards.

c. Mesa Road

MPU Recommendation CM-F3 would provide for improvements to the disturbed shoulder within the public right-of-way along Mesa Road near Big Rock Park in the Cowles Mountain area, in collaboration with the City of Santee. These improvements would provide for new diagonal parking spaces and a linear bike skills area. Mesa Road is a two-lane local road leading southward towards its present terminus at the boundary of the Park. The City of Santee classifies the street as a residential collector. Traffic volumes on Mesa Road, south of Prospect Avenue are approximately 630 ADT on weekdays and weekends.

For purposes of this analysis, it is assumed the parking area would accommodate up to 74 diagonal parking spaces along the edge of an improved Mesa Road. The configuration of the parking spaces would be determined during the planning and design of the project in collaboration with the City of Santee. This number of parking spaces is estimated to generate approximately 592 ADT along Mesa Road at this location. As a result, trip volumes on Mesa Road would nearly double. Although this estimate of traffic generation is worst case scenario, it falls below the City's thresholds requiring further traffic analysis. In addition, the 592 ADT estimate does not account for the traffic associated with approximately 25 vehicles that can now legally park along the Mesa Road frontage. As a result, the net increase in parking capacity would be closer to 50 spaces, with an associated trip generation closer to 400 ADT. In addition, based on observations of low use of the parking area during the course of this study, it appears unlikely that the parking area would be filled to its maximum capacity as was assumed in generating these trip estimates. For these reasons, it is unlikely that the parking area would result in any noticeable delay or exceed any established LOS standards.

d. Father Junipero Serra Trail

MPU Recommendation MG-F6 would provide for a parking area on the easterly side of Father Junipero Serra Trail in the Mission Gorge area, between Mission Gorge Road and the Visitor and Interpretive Center driveway entrance. This parking area would only be constructed if warranted by a parking study, as recommended in Facility Recommendation MG-F5.

Father Junipero Serra Trail extends from Mission Gorge Road on the west near Jackson Drive in the City of San Diego to eventually rejoin Mission Gorge Road in Santee to the east. A gate restricts traffic easterly beyond the visitor center to daytime hours and only in the eastbound direction as a one-way roadway. A 600-foot portion of Father Junipero Serra Trail, south of the Visitor Center, is traversable in two directions. This portion of the road is comprised of two lanes, approximately 36 feet wide, with parking allowed along the shoulders.

Recent traffic counts (2014) show that the weekday traffic on Father Junipero Serra Trail is 2,190 ADT in both directions rising to 3,500 ADT on weekends between Mission Gorge Road and the Visitor Center. For purposes of this analysis, it is assumed that 76 spaces would be accommodated at the proposed area. The addition of 76 spaces could add as many as eight times the number of spaces, or 608 trips per day, assuming each parking space turns over four times during the day. During a one-hour period, as many as 76 additional trips could be expected, assuming each visit lasts at least an hour.

As the Father Junipero Serra Trail is essentially a park road that is not classified in the Navajo Community Plan or in the City's normal scheme of road classifications, there is no codified limit on the amount of traffic it is intended to support. This portion of Father Junipero Trail south of the Visitor Center essentially acts as a driveway accessing the parking lot at the Visitor Center and the low-speed scenic drive through the gorge area along the river. This roadway is not intended to support large volumes of traffic at high speeds. Any increase in traffic would likely be a result of Park users accessing the Park and nearby parking areas, which is the intended use of the roadway. In addition, the traffic generated by the additional parking spaces would generally accommodate, rather than generate, new traffic. As a result, it is unlikely that the proposed parking area would result in any noticeable delay on area roads, or exceed any established LOS standards.

Issue 2: Circulation and Access

Would implementation of the Plans and associated discretionary actions create alterations to present circulation movements in the area including effects on existing public access points?

The NRMP would have no impact with regards to alterations to circulation movements or effects on access points, as management actions such as hand weeding, exclusionary fencing, and erosion control would not result in any activities that would affect traffic movements or access on area roads.

As previously detailed, MPU recommendations conceptually identify trails, shade structures, benches, picnic areas, and other related facilities as subsequent projects. As these types of subsequent projects would be located within Park boundaries and away from area roads, they would generally not have the potential to adversely affect circulation movements or public access points. However, several MPU recommendations are proposed (CM-F1, CM-F2, CM-F3, MG-F6) that would provide for new or modified access points off of area roads to provide access to proposed parking areas. These new access points could adversely affect circulation movements in the area.

MPU Recommendation CM-F2 would provide a new access point from Mission Gorge Road to access the recommended off-street parking area. As this parking area would take access off an arterial roadway, with high speeds (55 miles per hour), the access could adversely affect circulation on Mission Gorge Road. MPU Recommendation CM-F3 would provide for improvements to the disturbed shoulder along Mesa Road near Big Rock Park, in collaboration with the City of Santee. These improvements would alter an existing parking area and would result in a new parking configuration that could affect existing circulation. In addition, the proximity of the parking area and the bike skills area could create conflicts affecting circulation in this area.

Because of this program-level analysis, and conceptual nature of subsequent projects, it cannot be determined whether these parking areas and access points would be designed in such a manner that they would not adversely affect existing circulation or access, or create hazards or barriers for pedestrian or bicyclists. Issues relative to access and design would require further analysis at a project-level when future projects are proposed. For these reasons, impacts would be significant (Impact TRAF-1) and mitigation is required.

Issue 3: Parking

Would implementation of the Plans and associated discretionary actions impact the availability of parking?

Based on the City's 2016 Significance Determination Thresholds, impacts related to traffic and circulation would be significant if implementation of the Plans would:

- 1. Result in a parking shortfall or displacement of existing parking that would substantially affect the availability of parking in an adjacent residential area, including the availability of public parking.
- 2. Severely impede the accessibility of a public facility such as a park or a beach.

The NRMP would have a less than significant impact with regards to parking availability, as management actions such as hand weeding, exclusionary fencing, and erosion control would not block existing parking areas and would not require a substantial increase in Park personnel or volunteers that would occupy parking areas. The MPU is analyzed below.

Various MPU recommendations identify subsequent projects such as recreational amenities (e.g., shade structures, benches, picnic areas, trail improvements) and parking areas that could attract and accommodate additional visitors to the Park. While new recreational amenities such as park benches, restrooms, trail construction, and shade structures could attract more visitors to the Park, any increase in Park use would likely occur with or without these Park improvements, based on regional growth and the overall demand for parks. This increased demand for Parks increases the demand for parking. The focus of the analysis is on the new parking facilities recommended in the MPU (see Figure 5.11-7).

The Barker Way parking area (MPU Recommendation CM-F1) would provide off-street gravel or decomposed granite surfaced parking area for approximately 36 vehicles. This parking area is intended to reduce some of the parking demand on the local residential streets and would not displace existing parking opportunities. Currently, visitors parking to hike in the Park will typically park on the surrounding residential streets, both on the west and east sides of the street adjacent to residences. As this parking area would reduce the demand for parking within residential areas by providing a dedicated off-street parking area, it would improve an existing condition. In addition, the added parking spaces would improve accessibility to the Park.

The parking areas at Mission Gorge Road (MPU Recommendation CM-F2) and Father Junipero Serra Trail (MPU Recommendation MG-F6) would provide new parking areas for approximately 92 vehicles. These parking areas would not displace existing parking. In addition, the Father Junipero

Serra Trail parking area would reduce existing parking demand in the residential areas across Mission Gorge Road and eliminate an existing safety hazard that results when Park users illegally cross Mission Gorge Road on foot to access the park. These parking areas would also improve accessibility to the Park.

MPU Recommendation CM-F3 would provide for improvements to the disturbed shoulder along Mesa Road near Big Rock Park. The existing 25 parking spaces would be displaced by a total of 74 spaces, resulting in a net gain of approximately 50 spaces. This improvement would increase accessibility to the Park by providing a net increase in parking spaces. Parking would not adversely impact surrounding residences as the parking facilities would be on the west side of Mesa Road, not adjacent to residences.

Issue 4: Alternative Transportation

Would <u>implementation of</u> the Plans <u>and associated discretionary actions</u> conflict with the adopted policies, plans, or programs supporting alternative transportation modes (e.g., bus turnouts, trolley extensions, bicycle lanes, bicycle racks, etc.)?

The NRMP would not conflict with adopted policies, plans, or programs supporting alternative transportation modes, as the management actions such as hand weeding, exclusionary fencing, and erosion control would not create any barriers to implementation of such policies and plans.

Some MPU recommendations identified as subsequent projects include recreational amenities such as shade structures, benches, picnic areas, and parking areas that could attract and accommodate additional visitors to the Park, but would not conflict with policies supporting alternative transportation.

Other MPU recommendations propose to construct or improve trails that would support hiking, biking, and equestrian uses and would support policies related to alternative transportation modes. In addition, MPU Park-wide Planning Recommendation 4 states: "Incorporate trail linkages and public recreation into new developments adjacent to the Park." This recommendation would improve trail connectivity in the region by ensuring new developments have opportunities to access Park trails.

In addition, MPU Park-wide Planning Recommendation 17 states to "Coordinate with the Cities of San Diego and Santee and SANDAG to determine the feasibility of providing a bus stop at one or more locations near the Park." This recommendation would directly support alternative transportation modes by identifying opportunities to extend bus service to more locations near the Park.

5.11.5 Significance of Impacts

Issue 1: Capacity

Subsequent projects implemented in accordance with the MPUPlans, such as trails, park benches, and restrooms, would not attract a significant number of new visitors to the Park that would in turn

result in a substantial increase in traffic. Other subsequent projects, such as the parking areas, would not result in a substantial increase in traffic in relation to the capacity of the existing circulation system because these parking areas would generally be traffic accommodating, rather than traffic generating. In addition, the estimated traffic volumes do not exceed established thresholds that generally trigger the need for a further traffic analysis. Based on these factors, it is not anticipated that subsequent projects implemented in accordance with the MPU-Plans would result in a substantial increase in traffic in relation to the capacity of the existing circulation system. Impacts would be less than significant.

Issue 2: Circulation and Access

Subsequent projects implemented in accordance with the <u>MPU-Plans</u> could create alterations to present circulation movements due to the creation of new access points from area roads to provide for new off-street parking areas. As detailed plans for these subsequent projects are not available at this time, it cannot be guaranteed that they would be designed in a manner that would avoid significant circulation and access impacts. Therefore, impacts would be significant (Impact TRAF-1) and mitigation is required.

Issue 3: Parking

As the recommended parking areas would improve accessibility to the Park by providing additional parking areas, these recommendations would have an overall parking benefit. In addition, the parking areas would reduce current demand for parking on local residential streets. As a result, impacts related to parking would be less than significant.

Issue 4: Alternative Transportation

Implementation of the MPU-Plans would be consistent with existing policies supporting alternative transportation modes. Various MPU recommendations would support alternative modes of transportation and would not create a conflict with existing plans or policies. Therefore, impacts would be less than significant.

5.11.6 Mitigation Framework

Subsequent projects implemented in accordance with the Plans and associated discretionary actions would require further evaluation at the project-level to determine project specific impacts and mitigation. The following Mitigation Framework would be applied to address **Impact TRAF-1**.

MM-TRAF-1: Subsequent projects implemented in accordance with the MPU_Plans_that would have the potential to alter existing circulation or affect existing access points, including (but not necessarily limited to) MPU Facility Recommendations CM-F1, CM-F2, CM-F3, and MG-F6 shall be required to submit the necessary analysis, and design plans, and any other requirements pursuant to City Engineering standards the discretion of the City's Engineer. Measures that shall be considered required to the satisfaction of the City Engineer during subsequent project review to minimize

potential impacts from pedestrian/bicyclist/vehicle conflicts, and to enhance circulation, include (but not necessarily limited to):

- Appropriate signage
- Review for adequate sight distance, preparation of sight distance studies, and mitigation, where needed
- Road striping, where needed
- · Crosswalks, where needed
- Sidewalks/<u>and</u>-pathways for pedestrian access
- Bollards, where needed.

5.11.7 Significance after Mitigation

Although implementation of the Plans and associated discretionary actions would have the potential to result in significant impacts related to circulation and access, subsequent projects such as parking areas would be required to implement **MM-TRAF-1** prior to implementation. The Mitigation Framework requires site-specific environmental review, analysis of potential impacts, and implementation of measures to reduce significant impacts to below a level of significance.

5.12 Public Services

This section discusses public services serving the communities surrounding the study area, such as fire protection and police services, schools, parks and libraries, and describes the potential impacts that could result from implementation of the Master Plan Update (MPU) and Natural Resources Management Plan (NRMP) (collectively, the Plans for the Mission Trails Regional Park Park.

5.12.1 Regulatory Framework

Section 17620 of the California Education Code authorizes school districts to collect fees to mitigate the impact of new development on enrollment in a school district. The State Allocation Board determines the maximum level of fees a district can levy for residential and commercial/industrial development. Government Code Section 65996 also recites that the development fees authorized by Senate Bill (SB) 50 are deemed to be "full and complete school facilities mitigation" for the purposes of the California Environmental Quality Act (CEQA) or for any other reason.

The City of San Diego's (City's)_ Municipal Code identifies the San Diego Police Department (SDPD) as responsible for maintaining peace and order within the City (Section 22.0601). The Municipal Code fire protection and prevention ordinance adopted the 2010 California Fire Code in regards to emergency planning and preparedness (Section 55.0101).

The City's General Plan (2008a) also details response time objectives for the fire and police departments, which are based on national standards. For example, the total response time for deployment and arrival of the first-in engine company for fire suppression incidents should be within 4 minutes 90 percent of the time. For police services, SDPD has average response time guidelines as follows:

- Priority E Calls (imminent threat to life) within 7 minutes.
- Priority 1 Calls (serious crimes in progress) within 14 minutes.
- Priority 2 Calls (less serious crimes with no threat to life) within 27 minutes.
- Priority 3 Calls (minor crimes/requests that are not urgent) within 70 minutes.
- Priority 4 Calls (minor requests for police service) within 70 minutes (SDPD 2016).

5.12.2 Environmental Setting

5.12.1.1 Fire Protection

The study area is primarily served by the SDFD. The SDFD service area covers approximately 331 square miles and serves a population of approximately 1,337,000 people. SDFD has a total of 47 fire stations (City of San Diego 2014a). The San Diego Fire Department (SDFD) stations closest to the Park

proposed expansion areas include Station 34 located at 6565 Cowles Mountain Boulevard, Station 31 located at 6002 Camino Rico Road, and Station 39 located at 4949 La Cuenta Drive.

In addition to fighting fires SDFD responds to medical emergency calls, and SDFD's Fire Prevention Bureau conducts over 20,000 annual inspections and issues fire code permits (alarms, hazardous materials, special events) while developing safety policies and guidelines for residents and businesses. The City strives to provide an average maximum initial response time of no more than 5 minutes.

Citywide fire service goals, policies, and standards are located in the Public Facilities, Services, and Safety Element of the General Plan and the Fire-Rescue Services Department's Fire Service Standards of Response Coverage Deployment Study.

Response time standards are provided in the General Plan Public Facilities, Services and Safety Element and summarized below:

- a. To treat medical patients and control small fires, the first-due unit should arrive within 7.5 minutes, 90 percent of the time from the receipt of the 911 call in fire dispatch. This equates to one-minute dispatch time, 1.5 minutes company turnout time and 5-minute drive time in the most populated areas.
- b. To provide an effective response force for serious emergencies, a multiple-unit response of at least 17 personnel should arrive within 10.5 minutes from the time of 911-call receipt in fire dispatch, 90 percent of the time.
 - This response is designed to confine fires near the room of origin, to stop wildland fires to under 3 acres when noticed promptly, and to treat up to 5 medical patients at once.
 - This equates to 1-minute dispatch time, 1.5 minutes company turnout time, and 8-minute drive time spacing for multiple units in the most populated areas.

To direct fire station location timing and crew size planning as the community grows, fire unit deployment performance measures are established based on population density zones and are shown in Table 5.12-1, below.

Table 5-12-1 Deployment Measures to Address Future Growth by Population Density per Square Mile				
	Structure Fire	Structure Fire	Structure Fire	Wildfires
	Urban Area	Rural Area	Remote Area	Populated Areas
	>1,000-people/	1,000 to 500	500 to 50	Permanent open
	sq. mi.	people/sq. mi.	people/sq. mi. *	space areas
1 st Due Travel Time	5	12	20	10
Total Reflex Time	7.5	14.5	22.5	12.5
1 st Alarm Travel Time	8	16	24	15
1 st Alarm Total Reflex	10.5	18.5	26.5	17.5

NOTE: Reflect time is the total time from receipt of a 9-1-1 call to arrival of the required number of emergency units

SOURCE: City of San Diego General Plan 2008a.

The following population-based performance measures are used to plan for needed facilities. Where more than 1 square mile is not populated at similar densities, and/or a contiguous area with different zoning types aggregates into a population "cluster," these measures guide the determination of response time measures (Table 5-12-2) and the need for fire stations:

Table 5.12-2 Deployment Measures to Address Future Growth by Population Clusters			
Area	Aggregate Population	First-Due Unit Travel Time Goal	
Metropolitan	> 200,000 people	4 minutes	
Urban-Suburban	< 200,000 people	5 minutes	
Rural	500 - 1,000 people	12 minutes	
Remote	< 500	> 15 minutes	
SOURCE: City of San Diego General Plan 2008a.			

The jurisdictions of Poway, Santee, La Mesa, El Cajon, and the County of San Diego are adjacent to the project area. The northeast portion of the Cowles Mountain area is located in the City of Santee. While the majority of the project boundary is within the boundaries of the SDFD, mutual aid agreements exist between the fire agencies serving the affected jurisdictions to ensure adequate service provision. The City of Santee operates two fire stations located at 8950 Cottonwood Avenue and 9130 Carlton Oaks Drive, east of the project area (City of Santee 2014a).

The Cities of El Cajon, La Mesa, and Lemon Grove maintain a joint exercise of powers agreement for management and delivery of fire protection and emergency medical services. This management team is known as Heartland Fire & Rescue. The City of La Mesa Fire Department consists of three stations: Station 11 located at 8034 Allison Avenue, Station 12 located at 8844 Dallas Street, and Station 13 located at 9110 Grossmont Boulevard. The City of Poway Fire Department personnel respond from one of three stations located at 13050 Community Road, 16912 Westling Court, and 14322 Pomerado Road.

5.12.1.2 Police Protection

The Eastern Division of the SDPD serves a population of 155,892 people and encompasses 47.1 square miles, serving the majority of the study area, except the West Sycamore area, which is served by Northeastern Division, Beat 245. The Eastern Division SDPD station is located at 9225 Aero Drive and is staffed with 86 sworn personnel and 1 civilian employee The Eastern Division currently deploys a minimum of 9 patrol officers on first watch, 11 patrol officers on second watch, and 8 patrol officers on third watch. The Northeastern Division SDPD station is located at 13396 Salmon River Road and is staffed with 68 sworn personnel and 1 civilian employee The Eastern Division currently deploys a minimum of 9 patrol officers on first watch, 11 patrol officers on second watch, and 7 patrol officers on third watch. SDPD Beats 312, 324, and 325 serve the communities of Tierrasanta, Lake Murray, and San Carlos, respectively.

East of the study area, the San Diego County Sheriff's Department provides law enforcement services to the City of Santee, with a substation located at 8811 Cuyamaca Street (City of Santee 2014b). In addition, the SDPD has mutual aid agreements with all other law enforcement agencies in

San Diego County. The City of Poway, located north of the West Sycamore area, contracts with the San Diego County Sheriff's Department for services in law enforcement.

Based on performance goals published in the City's budget documents, the goal citywide is to maintain 1.48 officers per 1,000 population ratio. SDPD is currently reaching a staffing ratio of 1.36 sworn officers per 1,000 residents based on a 2015 residential population estimate of 1,311,882 (SDPD 2016). Beginning in fiscal year 2010, the police department experienced significant reductions in budgeted staffing levels in order to address an ongoing General Fund budget deficit. In fiscal year 2013, the police department developed a Five-Year Plan to restore service areas adversely impacted by these prior budget reductions. The budget added 35.33 full-time equivalent sworn positions and included a total of \$7.3 million in additional expenditures for police officer hiring and retention (City of San Diego 2014b).

5.12.1.3 Schools

There are no schools located within the boundaries of the study area. The surrounding communities are served by schools within the San Diego Unified School District, Santee School District, and the Poway Unified School District. The Tierrasanta Community Planning Area (CPA) is served by four elementary schools, one junior high school, and one high school. The Navajo CPA is served by ten elementary schools, two junior high schools, one high school, and three private schools. Within the East Elliott CPA, there are currently no schools as the area consists primarily of open space and a landfill. An elementary school within the Poway Unified School District is planned in the Sycamore Estates portion of the Rancho Encantada Precise Plan area, near the West Sycamore area. The Santee School District operates 10 schools serving the communities east of the Park within the City of Santee.

5.12.1.4 Parks and Recreation

There are three categories of recreation that constitute the City's municipal park system: resource-based parks, open space lands, and population-based parks. Resource-based parks are intended to serve residents and visitors and are located at, or centered on, notable natural or human-made features and can provide habitat and resource protection. There are two types of resource-based parks: regional parks, shoreline parks and beaches. Regional parks, such as the Park itself, are administered by a master plan, while shoreline parks and beaches do not typically have master plans. Open space parks are City-owned lands that provide habitat protection. Population-based parks serve the active and passive recreational needs of a neighborhood and community and are located ideally within walking distance or near residential land use. The General Plan recommends that population-based parks provide a minimum ratio of 2.8 useable acres per 1,000 residents.

The City's Parks and Recreation Department maintains more than 40,000 acres of developed and undeveloped open space and parkland categorized as population-based parks, resource-based parks, and open space. The physical facilities, plus classes, programs, and activities at these facilities constitute San Diego's municipal recreation system.

5.12.1.5 Libraries

There are numerous libraries located in the communities surrounding the study area. The Scripps Ranch Branch Library located at 10301 Scripps Lake Drive serves the population surrounding the West Sycamore area. The Navajo CPA is served by the San Carlos Library located at 7265 Jackson Drive and the Benjamin Library located at 5188 Zion Avenue. The Tierrasanta Library located at 4985 La Cuenta Drive serves the Tierrasanta CPA. The Santee Public Library located at 9225 Carlton Hills Boulevard serves residents of the City of Santee.

5.12.3 Significance Determination Thresholds

Based on the City's 2016 Significance Determination Thresholds that have been adapted for purposes of a programmatic analysis, a significant public services impact would occur if implementation of the Plans and associated discretionary actions would:

1. Promote growth patterns resulting in the need for and/or provision of new or physically altered public facilities, the construction of which could cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives.

5.12.4 Impact Analysis

Issue 1: Public Facilities

Would implementation of the Plans and associated discretionary actions promote growth patterns resulting in the need for and/or provision of new or physically altered public facilities, the construction of which could cause significant environmental impacts in order to maintain service ratios, response times, or other performance objectives?

The NRMP would have no impact with regards to public services, as management actions such as hand weeding, exclusionary fencing, and erosion control would not generate population or otherwise increase the demand for public services. The MPU is analyzed below.

As discussed in Chapter 3, Project Description, the MPU does not propose specific development at this time. It does, however, conceptually discuss proposed recreational amenities (e.g., shade structures, benches, picnic areas, trail improvements) and parking areas as subsequent projects that could attract and accommodate additional visitors to the Park. The MPU would not result in a direct increase in population, as no habitable structures involving residential or other related uses would occur. Therefore, no direct impact related to schools or libraries would occur. Potential indirect impacts related to police services, fire protection services, and parks are detailed below.

With regards to police services, SDPD Eastern and Northeastern Divisions, Beats 312, 324, and 325 would continue to serve the study area. The San Diego County Sheriff's Department will continue to provide law enforcement services within the areas of the Park in the City of Santee and City of Poway. The Law Enforcement Mutual Aid Plan, which permits the SDPD's Chief of Police to order law enforcement mutual aid services from other jurisdictions, will continue to be in effect. A comparison

of the police department's citywide response time goals and the 2015 average response times within Beats 245, 312, and 325 are presented in Table 5.12-3, which shows that all three beats are currently exceeding the Citywide response time goals. Development of recreational amenities in accordance with the MPU could potentially increase the number of visitors to the Park. However, it is not anticipated that the increase in the number of visitors would be large enough to substantially increase the need for police services—facilities from that associated with current use of the Park. Recreational amenities and trail improvements would be developed over time, and would not likely attract a significant new amount of visitors due to any specific subsequent project. Additionally, police response times within these three Beats would likely increase due to build-out of the surrounding community planning areas, and additional traffic generated by new growth independent of the Project. Therefore, implementation of the Project would not increaseaffect response times beyond those presented in Table 5.12-3, nor require the construction of new or improved and indirect impacts associated with the provision of police services and facilities, and as such, indirect impacts would be less than significant.

Table 5-12-3 2015 SDPD Average Response Times				
	Citywide Goal	Beat 245	Beat 312	Beat 324
Emergency	7	12.8	8.5	10.4
Priority 1	14	21.8	18.6	20
Priority 2	27	39.2	43.8	47.3
Priority 3	70	69.3	99.6	93.1
Priority 4	70	328.8	211.3	184
SOURCE: SDPD 2016.				

With regards to fire protection services, development of recreational amenities could potentially increase the number of visitors to the Park, thereby increasing the potential for human-induced wildfire, or increase the number of emergency calls if users require emergency evacuation as a result of an injury. Various MPU recommendations are intended to minimize indirect impacts, particularly on fire services as further described below.

MPU Park-wide Facility Recommendation 13 states "Continue to prohibit fires in the park to reduce fire danger, except within developed fire rings at the Kumeyaay Lake Campground, the East Fortuna Staging Area, and Lake Murray." This policy would continue to restrict fires within the Park to minimize fire hazards. MPU Recommendation CM-R17 addresses the need to prepare emergency response plans in coordination with emergency responders if a new rock climbing access area and trail to the western face of Pyles Peak is provided: "If the staging area in CM-F2 and the trail in CM-R12 are implemented, evaluate providing rock climbing access to the western face of Pyles Peak by constructing a new trail from the existing Pyles Peak trail...and an emergency response plan will need to be coordinated with San Diego Fire and Rescue." The MPU includes other recommendations to close and restore unauthorized trails (see Section 5, Recommendations of the MPU). These efforts could reduce the potential for Park users to become injured or lost from using unmarked and unmaintained trails.

All of these MPU recommendations would serve to ensure that activities within the Park would not substantially increase the <u>calls toneed for new or improved</u> fire and emergency <u>facilities for responders serving the study area</u>. Indirect impacts related to fire protection services and facilities would therefore be less than significant.

With regards to park services facilities, the Park would continue to function as a regional park, as defined in the City's General Plan. The MPU aims to provide for continued management and improvements to the Park and additional recreational amenities for City residents through the proposed expansion areas and recreational amenities within the park including services provided to the public at the existing MTRP Visitors Center. Potential impacts from new or improved facilities, trails, and other associated Park amenities are analyzed throughout this Program Environmental Impact Report PEIR at the program-level; subsequent projects implemented in accordance with the MPU Plans would be analyzed under CEQA at the project-level. Therefore, implementation of as the project Project, which would provide for increased recreational opportunities, and would not result in growth that would further burden existing parks the need for a new or expanded visitor center, and as such, impacts would be less than significant.

5.12.5 Significance of Impacts

Implementation of the Plans and associated discretionary actions would not result in an increase in population; therefore, no direct impact associated with the construction of public facilities would occur. Recreational amenities and trail improvements would be developed over time, and would not likely attract a significant new amount of visitors due to any specific subsequent projectresult in the need for new recreation facilities in the surrounding residential communities or expanded visitor center beyond what currently exists in the Park. In addition, numerous MPU recommendations serve to reduce other potential indirect impacts. Therefore, indirect impacts related to new facilities for police-services, fire-protection services, and parks would be less than significant.

5.12.6 Mitigation Framework

Impacts associated with fire, police services, schools, parkland, and libraries would be less than significant; therefore, no mitigation is required.

5.13 Public Utilities

This section addresses potential impacts to utilities and the environment based on the potential need to provide new or improved utility connections and services due to implementation of the Master Plan Update (MPU) and Natural Resources Management Plan (NRMP) (collectively, the Plans) for the Mission Trails Regional Park (Park). The information contained in this section is based on the utilities easement review technical study (Appendix I), in addition to information contained within the MPU. Utility services addressed include water, wastewater, reclaimed water, electrical transmission, solid waste, storm water infrastructure, communications, and gas pipelines.

5.13.1 Regulatory Framework

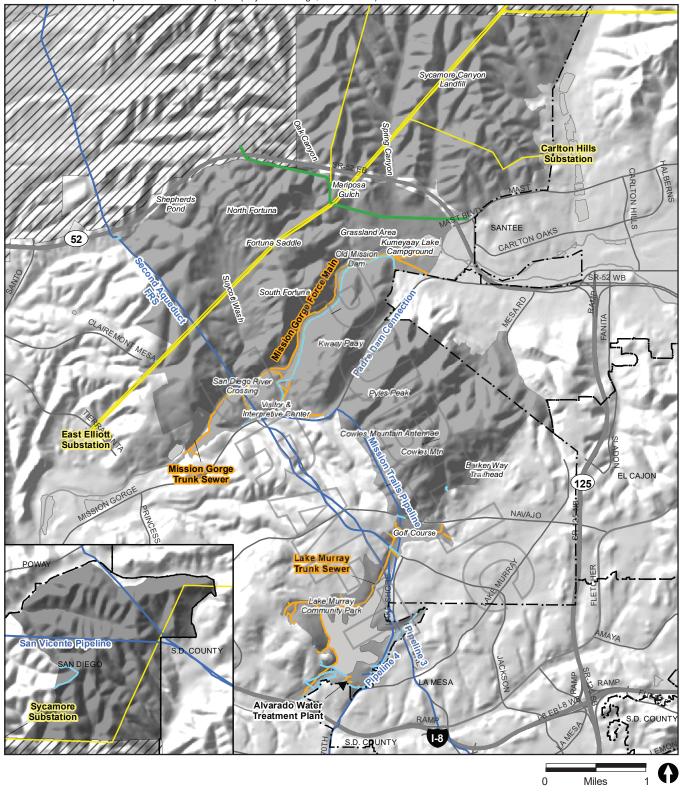
State regulations addressing electric transmission facilities include General Order 131-D (GO 131-D), which is applicable in the event that any electric transmission facilities and/or substations would require relocation or modification. The City is not the responsible entity for electric transmission facilities, nor does the project anticipate any relocation or modification of such facilities. There are no applicable federal or state regulations applicable to this issue. Local regulations are detailed below.

5.13.1.1 Countywide Siting Element

The Countywide Siting Element is a planning document that details the solid waste management needs of the region, including the existing shortage of disposal capacity, and presents strategies for responding to this shortfall, including increasing the waste diversion rate. The City of San Diego's (City's) Source Reduction and Recycling Element, as updated in annual reports, details the City's strategy for achieving this mandate, relying largely on the voluntary efforts of the community. Although solid waste management involves building and operating landfills, it also requires a diversity of strategies to reduce and manage waste.

5.13.1.2 City Municipal Code

The Municipal Code incorporates the Construction and Demolition (C&D) Debris Diversion Deposit Program (C&D Ordinance), Recycling Ordinance, and Refuse and Recyclable Materials Storage Regulations in an effort to meet its goals and polices regarding waste management and diversion. The C&D Ordinance requires that the majority of construction, demolition, and remodeling projects requiring building, combination and demolition permits pay a refundable C&D Debris Recycling Deposit and divert their debris by recycling, reusing or donating usable materials. The ordinance is designed to keep C&D materials out of local landfills and ensure they get recycled.



Legend ∴ ? Municipal Boundaries Utility/High Voltage Lines — Trunk Sewer/Force Main ✓ MCAS Miramar — Electric Lines — Water Supply Pipelines MTRP Boundary and Expansion Areas — High Pressure Gas Main — Water Mains

FIGURE 5.13-1 Major Utilities

5.13.1.3 Public Utilities Department

The City's Public Utilities Department (PUD) has utilities throughout the study area (Figure 5.13-1). Discharges of raw sewage into the River caused by blocked or overflowing sewer mains have been a major problem in the past and continue to this day in spite of the best efforts of the City to prevent such occurrences. In 2001, the Metropolitan Wastewater Department (now PUD) initiated a Sewer Spill Reduction Program funded by sewer rate increases. This program includes cleaning and inspecting thousands of miles of sewer as well as accelerating the replacement and rehabilitation of older facilities. General guidance for sewer facility replacement and management in environmentally sensitive lands is provided by City Council Policies 400-13 and 400-14, both adopted in January 2002. Council Policy 400-14 makes the redirection of sewer flow away from environmentally sensitive lands a priority.

To protect the City's utilities, encroachments into utility easements are allowed as follows:

General Landscape: Planting or seeding over sewer lines located within Open Space or ESL shall be as follows:

- No trees shall be planted within 10 feet of any sewer main or lateral.
- No shrubs that mature over 5 feet in height shall be planted within 5 feet of any sewer main or lateral

Threatened or Endangered Plants: No threatened or endangered plant species shall be planted or seeded on sewer access paths, within 3 feet of the edge of access paths, or within 10 feet of sewer mains or lines.

Landscape for Access Paths in Environmentally Sensitive Areas: Trees or shrubs that mature over 3 feet in height shall not be planted on the sewer access paths, and shrubs that will overgrow the access paths shall not be planted adjacent to the edges of the path area. Planting on the paths must be consistent with the approved planting palette included in the MPU. Additional or alternate plant species not included may be approved by the PUD, Environmental Permitting Section.

5.13.2 Environmental Setting

5.13.2.1 Water Supply Facilities

The San Diego County Water Authority (SDCWA) operates several pipelines and associated facilities that traverse five of the six areas of the Park: San Vicente Pipeline, Pipelines 3 and 4, Scripps Ranch Pipeline, and the Mission Trails Pipeline. Details of these pipelines are provided below and shown on Figure 5.13-1. Only the East Elliott area does not contain any water pipelines.

- The San Vicente Pipeline consists of 11 miles of 8.5-foot diameter pipeline. The pipeline runs from the San Vicente Reservoir in Lakeside through the West Sycamore area ending at the SDCWA Second Aqueduct west of Interstate 15.
- Pipeline 3, consists of 1 mile of 72-inch diameter pipeline in Baltimore Drive passing through the Lake Murray area.

- Pipeline 4, consists of 3 miles of 72-inch diameter pipeline beginning north of State Route 52 (SR-52) and crossing under SR-52 in a southeasterly direction on the eastern edge of the community of Tierrasanta, passing into the Park, crossing through Mission Gorge Road and Jackson Drive in the community of San Carlos, reentering the Park in the Lake Murray area, traversing east of the lake and continuing south of Interstate 8.
- The Scripps Ranch Pipeline connects to the Mission Trails Pipeline at SR-52 and delivers treated water to the Padre Dam Municipal Water District through a connection near Mission Gorge Road before turning south again into a tunnel along the edge the Cowles Mountain area and to the Alvarado Water Treatment Plant.
- The Mission Trails Pipeline traverses the southwestern flanks of Cowles Mountain and consists of 1 mile of 96-inch diameter welded steel pipeline flowing through the Second Aqueduct. The Mission Trails Second Aqueduct Flow Regulatory Structure I is located along the Mission Trails Pipeline near the western ridgeline in the Fortuna Mountain Area and delivers water from the Twin Oaks Valley Diversion structure to the Alvarado Water Treatment Plant.

The City's PUD operates and maintains several water pipelines and associated facilities in the Park, including the Murray First Pipeline, El Cajon Pipeline, College Ranch Feeder Pipeline, and the San Carlos Water Reservoir. City PUD also operates the Alvarado Water Treatment Plant which provides drinking water to customers in the City. The treatment plant capacity is 120 million gallons of treated drinking water per day, up to 200 million gallons per day.

5.13.2.2 Wastewater Facilities

The City's PUD operates and maintains major sewer facilities in the Park including the Lake Murray Trunk Sewer, Mission Gorge Trunk Sewer, and associated sewer mains (see Figure 5.13-1).

- The Lake Murray Trunk Sewer is located along the west side of Murray Reservoir and runs under the Lake Murray Trail, Lake Murray Community Park, and the existing golf course within the Lake Murray area. The northern end of the pipeline lies under Jackson Drive, ending near Cowles Mountain Boulevard. The southern end of the pipeline is south of Murray Dam. The trunk sewer consists of nearly 3 miles of 18-inch to 27-inch diameter durable plastic sewer mains.
- The Mission Gorge Trunk Sewer is located along the west side of the San Diego River through the Mission Gorge area and consists of 7 miles of 48-inch diameter steel pipe. The northern end of the pipeline lies under Father Junipero Serra Trail, ending near Kumeyaay Campground. The southern end of the pipeline is north of Mission Gorge Road.

5.13.2.3 Electrical Transmission and Gas Facilities

Several San Diego Gas & Electric (SDG&E) electrical transmission lines traverse portions of the park. In addition, there are numerous locations in the study area where SDG&E lower voltage lines cross primary overhead power lines. These overhead power lines interconnect to three electrical substations located just outside of the Park, referred to as the Elliott, Sycamore, and Carlton Hills

substations. The location of the high-voltage transmission lines and area substations are found on Figure 5.13-1.

SDG&E has a major high-pressure gas transmission line that runs from the main system backbone near east of Interstate 15 through Miramar across SR-52 into the Park in the Fortuna Mountain area. The line continues east through the northern Fortuna Mountain area to the East Fortuna Staging Area. This line provides gas to the cities of La Mesa and El Cajon.

5.13.2.4 Solid Waste Facilities

The City's Environmental Services Department does not provide solid waste collection services for the Park. All solid waste generated at and deposited in refuse containers within the Park boundaries are collected by Park personnel and disposed of at area solid waste facilities. There are currently four solid waste disposal facilities that accept municipal solid waste, along with a number of privately operated transfer stations and recycling facilities. Sycamore Canyon, Otay Annex, and Borrego Springs landfills are all privately owned and operated by Allied Waste Industries, Inc.; West Miramar Landfill is owned and operated by the City. Table 5.13-1 shows the permitted remaining capacity and estimated closure date for each of these facilities. The Sycamore Canyon Landfill is within the East Elliott area.

Table 5.13-1 Solid Waste Disposal Facilities				
Permitted Remaining				
Solid Waste Facilities	Capacity (cubic yards)	Projected Closure Date		
West Miramar Landfill	14,846,602	2022		
Sycamore Canyon Landfill	42,246,551	2031		
Otay Landfill	24,514,904	2028		
Borrego Landfill	478,836	2030		
SOURCE: CalRecycle Solid Waste Information System 2014.				

5.13.2.5 Storm Water Infrastructure

A majority of the storm water drainage within the study area flows over natural surfaces and drainages within the Park. However, several structural storm water drainage facilities are located at the following locations:

- At the southern end of the Mission Gorge subarea along Mission Gorge Road;
- At the south and southeast sides of the Cowles Mountain subarea along Golfcrest Drive, Navajo Road, and Barker Way; and
- At the northern end of the Lake Murray subarea along Murray Park Road and Jackson Drive, through the Mission Trails Golf Course and Lake Murray Park.

5.13.2.6 Communication Facilities

A major communication facility with receiving and transmitting antennas is located at the top of Cowles Mountain. Antennas are owned by both the City and the County of San Diego. Communications systems for telephone, computers, and cable television are limited within the Park.

5.13.3 Significance Determination Thresholds

Based on the City's 2016 Significance Determination Thresholds, that have been adapted for purposes of a programmatic analysis, impacts related to public utilities would be significant if implementation of the Plans and associated discretionary actions would:

1. Result in a need for new utilities, or require substantial alterations to existing utilities, including water and wastewater infrastructure, electricity and gas transmission lines, storm water drainage systems, solid waste disposal facilities, or communication systems, the construction of which would create a physical effect on the environment.

Issue 1: Utilities

Would implementation of the Plans and associated discretionary actions result in the need for new utilities or require substantial alterations to existing utilities including water and wastewater infrastructure, electricity and gas transmission lines, storm water drainage systems, solid waste disposal facilities, or communication systems, the construction of which would create a physical effect on the environment?

The NRMP would not result in the need for new utilities systems, nor would it require substantial alterations to existing utilities. Any water requirements that may be required during implementation of subsequent projects identified by the NRMP, such as watering for dust control or during revegetation activities, could be provided with existing water infrastructure, or through portable supplies, such as trucked water. Therefore, impacts would be less than significant. The MPU is analyzed below.

a. Water and Wastewater Facilities

The potential exists that certain types of recreational amenities conceptually identified as subsequent projects in accordance with the MPU-Plans may require water and sewer service, such as the proposed restroom facilities at the Old Mission Dam staging area in the Mission Gorge subarea (MPU Recommendation MG-F8) and at the West Sycamore staging area in the West Sycamore subarea (MPU Recommendation WS-F1). Proposed restrooms would require water and sewage disposal and would need to either connect to existing water or sewer lines or provide water through wells and sewage disposal through septic systems, although it is unlikely not anticipated that new restroom facilities with running water would be proposed at any significant distance from existing roads and utilities. Therefore, it is unlikely that these facilities there would be no trigger the need-for new water or sewer systems and there would be no associated physical impacts to the environment.

Other MPU Recommendations would generally not require water or sewer services as they do not involve habitable structures, such as residential housing or commercial offices. Implementation of the MPU would not change existing or planned land uses or convert any areas planned for open space to urban uses. Therefore, the MPU would not induce growth requiring the expansion or construction of new utilities to serve the project, the construction of which would create physical impacts.

Impacts related to water conservation and reclaimed water would also not occur with implementation of the MPU, as they do not include any residential, commercial or other development associated with high water use. Therefore, the water needs of subsequent projects contemplated by the MPU would be limited. In addition, the MPU would not prevent regional efforts in support of water conservation or use of reclaimed water.

The Park City's Parks and Recreation Department maintains a Good Neighbor Policy Agreement with the SDCWA with respect to the Park. The purpose of the agreement is to provide a comprehensive approach to providing water facilities within the Park to increase regional water supply reliability, while supporting the Park's goals of providing educational and recreational opportunities for the region and assuring that any negative impacts to the Park are mitigated. This agreement would continue if the MPU is implemented, and would also facilitate communication and coordination with the SDCWA regarding MPU Recommendations proposed near SDCWA facilities.

Nevertheless, subsequent projects implemented in accordance with the <u>MPU-Plans</u> would have the potential to be located near water/wastewater utilities. Grading activities during these subsequent projects, though rather limited, would have the potential to disrupt existing utilities. Therefore, impacts would be significant (**Impact UTIL-1**) and mitigation is required.

b. Electricity and Gas Transmission

Implementation of the Plans would not require any new or expanded electricity or gas transmission lines. However, several SDG&E electrical transmission lines traverse portions of the park and connect to nearby substations as shown on Figure 5.13-1. A major high-pressure gas transmission line is located within the Fortuna Mountain subarea. Implementation of the MPU recommendations would not require disturbance or alteration to these facilities. Any changes or alterations in the SDG&E facilities within the Park would need to be coordinated and executed by SDG&E and would require a separate environmental review. There would be no impact associated with electricity and gas transmission utilities.

c. Storm Water Drainage

The study area is primarily undeveloped and storm water flows over the natural surfaces and drainages. As such, there are limited structural drainage facilities within the Park. Several MPU recommendations identify subsequent projects that may require storm water drainage facilities. For example, the numerous parking areas identified within the MPU would likely require related drainage improvements. As these subsequent projects are conceptual in nature, it cannot be determined at this time if these improvements would result in impacts. Therefore, impacts would be significant (Impact UTIL-2) and mitigation is required.

d. Solid Waste

The potential exists that the various recreational amenities proposed as part of the MPU recommendations could increase the number of visitors to the Park, which would increase the amount of trash and recyclables collected in Park receptacles. The MPU recommendations also identify new trash receptacles to be installed around the Park. This could increase the volume of trash collected from the Park. Trash generated by Park users has to be transported to landfills and recycling centers. However, subsequent projects implemented in accordance with the MPU-Plans would not change any existing or planned land uses or convert any areas planned for open space to urban uses.

As the MPU would not induce growth in the region, any additional waste and recyclables collected from the Park would not represent an increase in regional solid waste generation associated with new residential or commercial land uses. As a result, the project would not result in a significant increase in the demand for disposal of solid waste that would require an expansion of landfills and recycling centers, the construction of which would create physical impacts.

e. Communication Systems

MPU Recommendation CM-F6 states: "When funds are available, and technological advances allow for minimization of equipment, the City and County antennas should be modified for a less visible profile, or be removed. Any modifications to the facilities will be coordinated through the City's Deputy Director of Communication and Networks and the County's Manager of Microwave/Radio Communications." The purpose of this measure is primarily to improve the aesthetics of Cowles Mountain; however, the MPU recognizes that complete removal of the facility is likely impractical. This recommendation would not adversely impact the existing communication facility because this measure would be implemented in coordination with the City's Deputy Director of Communication and Electrical Division and the County's Manager of Microwave/Radio Communications.

Implementation of the MPU recommendations would not change existing or planned land uses or convert any areas planned for open space to urban uses that would create a demand for new communication facilities resulting in physical impacts. Therefore, they would not require the expansion or construction of new communication facilities to serve the project. Impacts would be less than significant.

5.13.4 Significance of Impacts

Implementation of the Plans and associated discretionary actions would not result in the need for new utilities or services or require alterations to existing utilities including water and wastewater infrastructure, electricity and gas transmission lines, solid waste, or communication systems.

Subsequent projects implemented in accordance with the <u>MPU Plans</u> would have the potential to be located near water/wastewater utilities. Grading activities during these subsequent projects, though rather limited, would have the potential to disrupt existing utilities. Therefore, impacts would be significant (**Impact UTIL-1**).

Some subsequent projects identified by the <u>MPU_Plans</u> would have the potential to result in expanded storm water drainage facilities. These impacts would be significant (**Impact UTIL-2**).

5.13.5 Mitigation Framework

The following mitigation framework would apply to **Impact UTIL-1**:

MM-UTIL-1:

Prior to approval of subsequent projects implemented in accordance with the MPUPlans, the City Director of the Public Utilities Department shall determine, based on review of the project detailed plans, that future projects are sited and designed to avoid conflicts with existing public utilities in accordance with the Master Plan and City of San Diego Public Utilities Department guidance identified below. Future design of projects shall be based on the recommendations of an anticipated detailed grade and alignment study that addresses potential conflicts with existing utilities and access road realignments implemented in compliance accordance with Council Policies 400-13 and 400-14. The realignments of utilities or access roads implemented in compliance accordance with Council Policies 400-13 and 400-14 could result in secondary impacts on biological, or tribal cultural resources.

The following measures shall Measures that could be incorporated into future projects to minimize potential conflicts with utilities shall include, but are not limited to, coordination regarding the location of the trails and pathways with the Park Planning Section of the Development Services Planning Department or the Director of the Public Utilities Department designee and into determine compliance with the Sewer Design Guidelines and other utility agencies that require access to the facilities. If feasible, a Access to the sewer facilities shall also be coordinated to provide combined access to storm water pollution facilities in order to minimize the impact on open space and canyons by having common access. The access shall be proposed in a strategic location to that will facilitate Council Policies 400-13 and 400-14. If future trail alignments shall be are coordinated with planned or existing utility access roads then the following shall be considered required:

- Areas within 10 feet of sewer mains shall be kept clear of trees.
- When feasible, ILocate future access in accordance with the Sewer Design Guide requirement for access roads.
- Design trails and pathways to also serve as a sewer access road centered over the ultimate sewer location if determined feasible at the project level.
- Where feasible, incorporate the sewer depth, slope, and location requirements of the Sewer Design Guide (February 2013).
- Any grade or alignment study shall include cross sections showing existing and proposed utilities and access roads.

Implementation of the mitigation framework outlined in <u>MM-UTIL-1, MM-LU-1, MM-BIO-1 and MM-BIO-2, MM-HIST-1a and MM-HIST-1b, MM-HAZ-1 and MM-HAZ-2, MM-HYD/WQ-1</u>, and <u>MM-HYD/WQ-2 in Section 5.8 of this Program Environmental Impact Report (PEIR)</u>-would reduce **Impact**

UTIL-2 to below a level of significance because it would ensure that future projects implemented in accordance with the Plans would adhere to the regulatory requirements contained in the City's Storm Water Runoff and Drainage Regulations of the Land Development Code and other applicable requirements.

5.13.6 Significance after Mitigation

Subsequent projects implemented in accordance with the MPU-Plans would be required to avoid or mitigate potential conflicts with existing utilities and planned or existing access pathways in accordance with the regulations and performance standardsguidelines outlined in MM-UTIL-1. Any subsequent projects requiring new storm water infrastructure would be required to adhere to MM-UTIL-1, MM-LU-1, MM-BIO-1 and MM-BIO-2, MM-HIST-1a and MM-HIST-1b, MM-HAZ-1 and MM-HAZ-2, and MM-HYD/WQ-1 and MM-HYD/WQ-2. Adherence to the Mitigation Framework would ensure potential impacts would be less than significant.



Chapter 6 Significant Unavoidable Environmental Effects/Irreversible Environmental Changes

6.1 Significant Environmental Effects Which Cannot Be Avoided if the Project Is Implemented

In accordance with the California Environmental Quality Act CEQA Guidelines Section 15126.2(b), any significant unavoidable impacts of a project, including those impacts that can be mitigated, but not reduced to below a level of significance despite the applicant's willingness to implement all feasible mitigation measures, must be identified in the Program Environmental Impact Report PEIR. No significant and unavoidable effects would occur due to implementation of the Master Plan Update (MPU) and Natural Resources Management Plan (NRMP) (collectively, the Plans for the Mission Trails Regional Park Park (refer to Chapter 5 of this PEIR for further detail). All significant impacts identified in Chapter 5, Environmental Impact Analysis, of this PEIR can be reduced to below a level of significance with implementation of the Mitigation Framework identified in Chapter 5.

6.2 Significant Irreversible Environmental Changes Which Would Be Caused by the Project Should It Be Implemented

Section 15126.2(c) of the CEQA Guidelines requires an evaluation of significant irreversible environmental changes which would occur should the Plans be implemented. Irreversible changes typically fall into three categories:

- Primary impacts such as the use of nonrenewable resources (i.e., biological habitat, agricultural land, mineral deposits, water bodies, energy resources and cultural resources);
- Primary and secondary impacts such as providing access to previously inaccessible areas;
 and
- Environmental accidents potentially associated with subsequent projects.

Section 15126.2(c) of the CEQA Guidelines states that irretrievable commitments of resources should be evaluated to assure that current consumption of such resources is justified.

Implementation of the Plans would not result in significant irreversible impacts to biological resources, agricultural land, mineral deposits, water bodies, energy resources, or historical resources. Although sensitive biological resources are identified throughout the study area which would be impacted by subsequent projects implemented in accordance with the Plans, direct and indirect impacts can be offset through strict compliance with the Mitigation Framework identified for biological resources. Subsequent projects implemented in accordance with the Plans would have the potential to impact archaeological sites within the study area; however, these potential impacts can be mitigated through strict adherence to the Mitigation Framework further detailed in Chapter 5 of the PEIR.

As further described in Chapter 9 of this PEIR, the Plans would not result in the loss of any agricultural lands or mineral deposits. Under implementation of the Plans, the study area would remain a regional park providing recreational open space and biological habitat. Although portions of the study area may contain agricultural or mineral resources, implementation of the Plans would not impact these mineral resources because the resource would continue to remain available.

The Plans would not provide access to areas that were previously inaccessible. The study area is surrounded by urban uses and roadways. Four areas (Lake Murray, Cowles Mountain, Mission Gorge, and Fortuna Mountain) are currently within the official Park boundaries and are used by humans for recreation and maintenance of utilities. The East Elliott and West Sycamore areas are also currently used for recreation (even though they are not officially within Park boundaries), as well as maintenance of utilities. Although some areas of the Park will now officially be accessible to recreation uses, or trails may extend to previously inaccessible areas, subsequent projects contemplated by the Plans would be required to analyze potential edge effects on adjacent biological habitat. Sections 5.1 and 5.5 of the PEIR set forth a mitigation framework that subsequent projects would be required to follow. Furthermore, trails and other recreational amenities would only be located onin areas under the land use authority of the City of San Diego on City-owned or leased parcels. Other trails on City-owned land or leased parcels that have previously been created illegally would be closed to public use. Additionally, although covered under the MPU and addressed in the PEIR from a programmatic perspective, future trail improvements on Countyowned/managed land within the Park would require subsequent environmental review in accordance with CEQA and coordination with City staff in accordance with Joint Powers Agreement O-18268. Therefore, implementation of the Plans would not result in significant impacts related to accessibility.

Construction of subsequent projects implemented in accordance with the Plans may require limited consumption of non-replenishable resources, or resources which may renew slowly. These resources would include certain types of lumber and other forest products; aggregate materials used in concrete and asphalt (e.g., sand, gravel and stone); or metals (e.g., steel, copper and lead). Fossil fuels, such as gasoline and oil, would also be consumed in the use of construction vehicles and equipment. Subsequent projects would not entail large development of buildings that require large amounts of supplies; a majority of these subsequent projects would be trail creations or reroutes, which require no supplies. Picnic shelters, restrooms, and parking areas contemplated by the MPU would require some of these supplies, however.

With respect to environmental accidents potentially associated with the Plans and as further discussed in the PEIR, the study area contains unexploded ordnance, which could be encountered during construction of subsequent projects. The risk for wildfires is high throughout the study area, as it is almost entirely composed of natural, unmaintained open space areas. Based on the analysis provided in Section 5.7, although conditions exist within the study area associated with hazardous materials and risk of wildfires, the MPU Recommendations along with adherence to the Mitigation Framework are intended to assure compliance with regulatory requirements, which would reduce the potential for environmental accidents.

7

Chapter 7 Growth Inducement

In accordance with Section 15126.2(d) of the California Environmental Quality Act (CEQA) Guidelines and the City of San Diego's 2016 Significance Determination Thresholds, an Environmental Impact Report must include an analysis of the growth inducing impact of the Plans. Growth inducement refers to economic or population growth, the construction of additional housing, or removal of obstacles to population growth associated with a proposed project.

Direct growth inducement may result from provision of public services and infrastructure such as roadways and utility lines to a previously undeveloped area. These can foster additional growth by reducing development constraints for nearby areas, thereby inducing other property owners in the area to convert their land to other uses. Direct impacts can also result from a development's population placing strain on existing public services, or a particular development increasing the pace of density of existing surrounding developments.

Indirect growth inducing impacts include the additional demand for housing, commodities, and services that new development attracts by increasing population or services in an area. Increases in the population may strain existing community service facilities, requiring construction of new facilities that could cause significant environmental effects. It cannot be assumed that growth in any area is necessarily beneficial, detrimental, or of little significance to the environment.

Implementation of the Master Plan Update (MPU) and Natural Resources Management Plan (NRMP) (collectively, the Plans for the Mission Trails Regional Park Park would not directly induce growth within the study area. The Plans do not propose specific development; they are an integrated set of management guidelines for the Park, with the NRMP focusing on the natural resources and the MPU focusing on public access and recreation. Furthermore, implementation of the Plans would not change any existing or planned land uses or convert any areas of the Park planned for open space to urban uses.

Additionally, subsequent projects contemplated by the Plans would be subject to further design and environmental review. None of these projects involve any residential or other component that would directly induce growth within the study area. The Plans would not foster unplanned growth in the study area. Therefore, the Plans would not result in direct impacts related to inducing growth.

Indirect impacts may result with implementation of the subsequent projects contemplated by the Plans. The addition of trails and other recreation amenities contemplated by the MPUPlans could attract additional visitors to the study area. However, this would be short-term and would not result in a long-term increase in population. Therefore, indirect impacts related to inducing population growth would be less than significant.

In addition, Plans would not extend any utilities or expand services beyond those planned or already constructed in the study area. Implementation of the Plans would only require minimal connections to existing utilities for facilities such as public restrooms, drinking fountains, and lighting that may be implemented in accordance with the MPU. If such facilities are implemented as subsequent projects under the MPUPlans, the study area contains numerous utilities, such as water and wastewater pipelines, to which these projects could connect. The facilities would be sited near these utilities, and would, therefore, not require the extension of significant new or expanded utility services. Because subsequent projects contemplated by the MPUPlans would connect with existing available utilities in the area and, growth-inducing impacts would be less than significant.

Overall, implementation of the Plans would not result in either direct or indirect impacts related to inducing population growth. Impacts would be less than significant.



Chapter 8 Cumulative Impacts

According to Section 15355 of the California Environmental Quality Act CEQA Guidelines, "cumulative impacts" refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. These 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 future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

The basis for the analysis of cumulative impacts is dependent on the nature of the issue. A Program Environmental Impact Report-PEIR must discuss cumulative impacts when the project's incremental contribution is cumulatively considerable (CEQA Guidelines, § 15130(a)). If the combination of the project's incremental effect and the related effects from other projects is not significant, the PEIR should briefly explain why the cumulative effect is not significant (CEQA Guidelines, § 15130(a)(2)).

A PEIR may determine that a project's contribution to a significant cumulative impact would not be cumulatively considerable based on appropriate mitigation and this finding can be made if the project is required to implement or fund its fair share of a mitigation measure or measures designed to alleviate the cumulative impact (CEQA Guidelines, § 15130(a)(3)). A PEIR need not discuss significant cumulative impacts in as great detail as is provided for project impacts alone (CEQA Guidelines, § 15130(b)). The discussion should be guided by standards of practicality and reasonableness (CEQA Guidelines, § 15130(b)).

8.1 Cumulative Projects

According to Section 15130(b)(1) of the CEQA Guidelines, the discussion of cumulative effects is to be based on either (a) "a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those impacts outside the control of the agency," or

(b) "a summary of projections contained in an adopted plan or related planning document, or in a prior environmental document which has been adopted or certified, which described or evaluated regional or area wide conditions contributing to the cumulative impact. Any such planning document shall be referenced and made available to the public at a location specified by the Lead Agency." This section identifies the cumulative projects that were considered for purposes of this cumulative analysis.

8.1.1 Long-Range Plans

In addition to the long-range plans discussed below, each subject area section includes a discussion of the regulatory framework, which includes long-range planning documents that are relevant to a specific environmental issue area.

8.1.1.1 San Diego River Park Master Plan

The San Diego River Park Master Plan (SDRPMP), adopted in 2013, provides the vision and guidance to restore the relationship between the San Diego River and surrounding communities by creating a linear river park, stretching from the Pacific Ocean at Ocean Beach Park to the City of San Diego's (City's) jurisdictional eastern boundary at the City of Santee. The SDRPMP covers the 17.5-mile stretch of the San Diego River and its eastern reaches include land within the Park. Future actions anticipated by the SDRPMP include implementation of design guidelines, parking, landscaping, storm water and water quality improvements, lighting, signage, brush management, structures, and floodway, path, and trail improvements.

8.1.1.2 City of San Diego General Plan

The City's General Plan is made up of 10 elements that provide a comprehensive slate of citywide policies and further the City of Villages smart growth strategy for growth and development. The General Plan was comprehensively updated in 2008. Community plans work together with the General Plan to provide location-based policies and recommendations in the City's 50+ community planning areas. Community plans are written to refine the General Plan's citywide policies, designate land uses and housing densities, and include additional site-specific recommendations as needed.

8.1.1.3 Santee General Plan Update GP2020

The City of Santee's updated General Plan, adopted in July 2003, is used to guide the decisions of elected officials and City staff when considering community development proposals, infrastructure improvements, and public service expenditures (City of Santee 2003).

8.1.1.4 Pure Water San Diego Program

The Pure Water San Diego Program is a phased, multi-year program to produce purified water to supplement San Diego's drinking water supply. The program will provide a third of San Diego's local water supply by 2035 by using proven technology to clean recycled water to produce safe, high-quality drinking water. The program is a cost-effective investment that will provide reliable drinking

water that is controlled locally and drought proof. Currently only 8 percent of wastewater leaving residences and business is recycled, the program would recycle all wastewater and maximize the use of water.

8.1.1.5 Draft Vernal Pool Habitat Conservation Plan

The Draft Vernal Pool Habitat Conservation Plan-VPHCP, adopted by the San Diego City Council on January 22, 2018, is intended to provide an effective framework to protect, enhance, and restore vernal pool resources within the City, while improving and streamlining the environmental permitting process for impacts to threatened and endangered species associated with vernal pools. The Draft-VPHCP covers vernal pools and seven threatened and endangered covered species that do not have federal coverage under the City's Multiple Species Conservation Program—MSCP Subarea Plan. In June 2018, the USFWS issued a Biological Opinion in accordance with Section 7 of the FESA regarding issuance of an ITP for implementation of the City's VPHCP pursuant to section 10(a)(1)(B) of the act. Subsequently on August 3, 2018, the USFWS made findings and recommendations for issuance of Section 10(a)(1)(B) Permit number TE-97791C to the City in accordance with the VPHCP, which covers incidental take for the two federally endangered animal species (San Diego fairy shrimp and Riverside fairy shrimp) along with the five listed plant species allowing the City to grant permits for take of covered species, and as such, a separate permit is not required from the wildlife agencies.

Part of the Draft-VPHCP conservation strategy is to expand the City's existing Multi-Habitat Planning Area MHPA to conserve targeted vernal pool complexes in a configuration that maintains habitat function and viability of the seven covered species, consistent with the Vernal Pool Recovery Plan (USFWS 1998); and to implement avoidance measures and minimization of minimize impacts to vernal pools consistent with the Draft_VPHCP, VPMMP, NRMP, and the City's Environmentally Sensitive Lands (ESL) Regulations. Mission Trails Regional The Park contains high-quality pools in two locations within the Parkits boundaries. Activities that may impact vernal pools would be limited to those identified in the Draft-VPHCP as covered activities that cause temporary habitat disruption but do not permanently alter landforms, and do not result in permanent habitat loss or negative impacts to vernal pool watersheds (e.g., recontoured vernal pool basins that will be restored). These activities include maintenance and use of existing trails, development of new trails, and brush management and weed abatement. The Mission Trails Regional Park Master Plan Update MPU incorporates the goals and objectives of the Draft_VPHCP and would be consistent with the requirement of the Draft Vernal Pool Management and Monitoring PlanVPMMP. While no impacts to vernal pools are expected to occur within the Park, restoration efforts could result in impacts to vernal pool species included as a covered activity per the Draft-VPHCP. Mitigation in accordance with the Draft-VPHCP, ESL Regulations, and City's Land Development Manual Biology Guidelines would be required.

8.1.2 List of Development Projects

8.1.2.1 Sycamore Landfill Master Plan Expansion

The Sycamore Landfill Master Plan, approved in 2012, provided for a landfill expansion to increase the footprint of the landfill by approximately 167 feet, increase the height to 1,050 feet above mean sea level, and accept up to 13,000 tons of solid waste per day. The proposed project would increase the permitted daily tonnage from 3,300 tons per day to 5,000 tons per day in 2015, increasing gradually until it reaches 13,000 tons per day in 2025. This would result in an increase in municipal solid waste capacity from approximately 71 million cubic yards under the current plan, to 151 million cubic yards. The landfill is located in the East Elliot Community Plan and required an amendment to the Community Plan. The expansion would be phased-in over time and consistent with the San Diego franchise agreement. With the expansion, the landfill would be operational until approximately 2042. Truck trips would increase from 1,540 in 2003 to 6,680 in 2025. All significant traffic impacts were reduced to below a level of significance with mitigation.

8.1.2.2 Castlerock

An Environmental Impact Report (EIR) Addendum was approved in May 2015 for the Castlerock project, which is a proposed residential development consisting of 424 single-family homes, 5.3 acres of public parks, 0.8 acre of pocket parks, a multi-use trail, and associated infrastructure. A total of 91.5 acres would be retained in open space, including 88.1 acres of MHPA open space. The project was located within the City of San Diego and has now been annexed into the City of Santee. The project is located along the eastern boundary of the City of San Diego, north of State Route 52 (SR-52) and at the eastern edge of the East Elliott area. Primary access to the project site would be provided via Mast Boulevard and would include frontage improvements to Mast Boulevard including a signalized intersection, a dedicated right-turn pocket on westbound Mast Boulevard, and the provision of 5-foot sidewalks, and landscaping. The project is estimated to generate approximately 4,240 average daily trips. This project is currently under construction. All MHPA lands will remain within the City of San Diego as part of the Park.

8.1.2.3 Fanita Ranch

The Fanita Ranch Specific Plan is a proposed residential development project within the northern portion of the City of Santee. The City of Santee certified a Final EIR for Fanita Ranch in December 2007. The project analyzed in the 2008 certified EIR proposed to develop approximately 970 acres of land into 1,380 single-family dwelling units and 230 acres into a pedestrian-oriented village center with 15 live/work units and community-serving recreational resources, including a 10–acre lake and a fire station. The remaining approximately 1,400 acres of land would become an open space preserve. Once operational, the project would generate approximately 19,000 vehicle trips per day.

However, the certified EIR was invalidated in 2012 due to litigation. Since then, the property was acquired by another developer who is in the process of obtaining new entitlements for a similar development. The exact details of the updated proposal are not known at this time, but are likely similar to the original proposal.

8.1.2.4 River Park at Mission Gorge

A Notice of Preparation was prepared in 2009 for the River Park at Mission Gorge project, which involves the creation of 83 lots for 2,156 residential condominiums and commercial buildings proposed on a 366-acre site at 7500 Mission Gorge Road within the Navajo Community Plan, Council District 7 and the Tierrasanta Community Plan. The project would include a Community Plan Amendment, Site Development Permit for Environmentally Sensitive Lands, Planned Development Permit, Rezone, and Vesting Tentative Map. An EIR for this project has not been released.

8.1.2.5 Flow Regulatory Structure II and Vent Demolition

The San Diego County Water Authority (SDCWA) maintains critical water pipelines beneath portions of the Park. The SDCWA Flow Regulatory Structure (FRS) II project would provide a new underground flow regulatory structure, or a covered reservoir, to help regulate the water system's flow of untreated water. The FRS II would be capable of holding up to 12 million gallons of untreated water. An aboveground access building would be built to house instrumentation and controls, provide ventilation and security, and allow access for maintenance and repairs. When the new flow regulator structure is complete, SDCWA would be able to remove existing blue vent stacks that are visible on hilltops within the Park and replace them with smaller structures. Trip generation associated with this project would be limited to temporary construction traffic. Construction of the FRS was delayed in 2011 due to concerns over increasing water rates. The SDCWA construction schedule indicates construction was to begin in mid-2014 and be complete by mid-2016; however, these dates were estimates and construction may have been further delayed.

8.2 Cumulative Impact Analysis

8.2.1 Land Use

The geographic scope of cumulative impact analysis for this issue would be the study area and the lands surrounding it by approximately 1 mile, including the identified projects in Section 8.1.2, as these surrounding lands would have the potential to contribute to cumulative significant land use impacts.

As a general rule, and as stated in San Diego'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 land use impacts. As detailed in Section 5.1 of this PEIR, the Plans are consistent with applicable General Plan goals and policies of the Recreation and Conservation Elements, the MSCP_Subarea Plan, the Community Plans for Navajo, Tierrasanta, and East Elliott, and the Rancho Encantada Precise Plan. Subsequent projects implemented under the Plans would have the potential to result in land use adjacency conflicts with the MHPA; however, the mitigation framework would ensure each subsequent project reduces these conflicts to a less than significant level.

As the Plans would be consistent with the existing Park and surrounding land uses and would not conflict with existing land use plans for the area, they would not contribute to a cumulative impact

related to land use. Cumulative projects in the area would be required to evaluate land use impacts, consider applicable General Plan goals and policies, and mitigate significant land use impacts. Residential cumulative projects identified in Section 8.1.2 would have dissimilar land use related impacts as compared to a proposed park master plan update due to the nature of the use. For these reasons, cumulative land use impacts would be less than significant.

8.2.2 Visual Effects and Neighborhood Character

The geographic scope of cumulative impact analysis for this issue would generally encompass areas surrounding the Park which can view the dominant landforms that make it regionally significant. As discussed in Section 5.2 of this PEIR, implementation of the Plans would maintain existing views to and from the Park, would result in minimal landform modification, and would be compatible with neighborhood character. As the Plans include recommendations for maintaining and expanding the Park, which is a visual resource for surrounding communities, the Plans generally intend to maintain and enhance the existing visual resource. Similarly, the natural open space character of the study area would be retained and would maintain compatibility with the surrounding communities.

As implementation of the Plans would not result in significant impacts related to landform alteration, visual quality, lighting, or neighborhood character, cumulative impacts would not occur. In addition, as the project is an update to the master plan for the Park, and not a development project, it would not contribute to the type of viewshed impacts that typically occur as a result of residential development (e.g., rooftops and mass grading). Cumulative visual impacts would be less than significant.

8.2.3 Air Quality

The geographic scope of cumulative impact analysis for air quality is considered to be the San Diego Air Basin. As discussed in Section 5.3 of this PEIR, implementation of the Plans would not result in a conflict with or obstruct implementation of the applicable air quality plan or expose sensitive receptors to substantial pollutant concentrations. As implementation of the Plans would not cause population growth or an increase in currently established population projections, they would be consistent with the General Plan and Regional Air Quality Standards. The worst-case construction emissions associated with subsequent projects such as trail or parking area construction would be less than the applicable thresholds for all criteria pollutants and would not result in an air quality violation. Even in the rare case that multiple subsequent projects are being constructed at the same time, their worst-case emissions combined with other cumulative projects would not result in air quality violations. No significant cumulative air quality impacts would result.

8.2.4 Greenhouse Gas Emissions

Impacts associated with greenhouse gas GHG emissions are global in nature and are considered a significant cumulative impact when considering global contributions of GHG emissions from future growth and development. As discussed in Section 5.4 of this PEIR, implementation of the Plans would be below the screening level thresholds for determining potentially significant GHG impacts for the region. GHG emission due to construction activities and operation associated with the

MPUPlans would not exceed 900 metric tons of carbon dioxide equivalents annually. Additionally, as implementation of the Plans would not result in an increase in long-term GHG emissions or conflict with applicable plans, policies, and regulations pertaining to the reduction of GHGs, the project's contribution to GHG emissions would not be cumulatively considerable.

8.2.5 Biological Resources

Preservation of the region's biological resources has been primarily addressed through the implementation of regional habitat conservation plans. Impacts to biological resources in the City are managed through the adopted MSCP Subarea Plan, which is incorporated by reference in the City's adopted General Plan, Land Development Code ESL Regulations, and Biological Guidelines. Additional state and federal regulations (e.g., Endangered Species Acts) also address some MHPA and non-MHPA biological resource areas and may be required for specific projects (e.g., for vernal pool areas).

The geographic scope of cumulative impact analysis for this issue would be the study area as it is almost entirely within the MHPA and represents one of the largest contiguous areas for habitat preservation in the region. As discussed in Section 5.5 of this PEIR, the study area, as identified by the MSCP Subarea Plan, is a core biological resource area and regional wildlife corridor. There are 8,216 acres of sensitive upland vegetation communities, 568 acres of sensitive riparian vegetation communities, 23 sensitive plant species, and 41 sensitive wildlife species. Management directives within the MSCP Subarea Plan specifically identified the preparation of a natural resources management plan (NRMP) in order to manage biological resources within the study area at the preserve level. The NRMP, as analyzed in Section 5.1 of this PEIR, fulfills the management directives identified by the MSCP Subarea Plan.

Cumulative impacts could occur within the study area at buildout of the MPUPlans due to projects such as recreation trails and access roads within the MHPA in accordance with the MPU. (See Figure 3-3 of this PEIR for the ultimate, proposed, and conceptual MPU trail buildout.) Subsequent projects (e.g., trails) implemented in accordance with the MPUPlans would have the potential to impact sensitive plants and wildlife species directly through the loss of habitat or indirectly by placing trails and recreational facilities adjacent to the MHPA including projects and activities within the Park that are covered under the Draft-VPHCP. These projects also have the potential to result in habitat modifications, which in turn may interfere with wildlife nesting, foraging, or movement within riparian habitats and upland habitats. However, the NRMP developed a prioritization system for management actions for species and habitats within the study area. It identified threats, management goals and objectives, monitoring, and minimization of impacts due to management and monitoring activities for each species and habitat type. Therefore, implementation of the NRMP would serve to cumulatively protect and manage biological resources within the study area.

Subsequent projects contemplated by the MPUPlans such as trails (including closures or reroutes), parking areas, restrooms, and park furniture would have the potential to cumulatively result in impacts to loss of sensitive vegetation communities (which provides habitat for sensitive species), as well as indirect impacts to sensitive plant and wildlife species. However, as subsequent projects are implemented by the MPUPlans, each project would be required to adhere to the mitigation framework set forth in Section 5.5. The mitigation framework would ensure, for example, that a trail

creation project would not be able to go forward until adequately analyzed for potential impacts to sensitive vegetation communities. This subsequent project would be required to mitigate for such impacts, either through restoration of a trail that would be closed, or in a manner that provides the same habitat quality in kind (as specified by the City's Biology Guidelines, MSCP_Subarea Plan, etc.)

Therefore, implementation of the NRMP and adherence to the mitigation framework set forth in Section 5.5 for subsequent projects contemplated by the <u>MPUPlans</u> would serve to reduce potentially cumulative biological resource impacts to less than significant.

8.2.6 Historical Resources

The geographic scope of cumulative impact analysis for cultural resources varies depending on the type of resource with potential to be impacted. Geographic scope can be the entire area within which the resource has the potential to occur. For the purpose of this PEIR, the geographic scope for the cumulative analysis of cultural resources is San Diego County.

The General Plan PEIR stated that the continued pressure to develop or redevelop areas would result in incremental impacts to the historic record in the San Diego region, which was determined to be a cumulatively significant impact. Regardless of the efforts to avoid impacts to historical resources, the more that land is redeveloped, the greater the potential for impacts to historical resources.

The Plans would not, unlike other development projects listed in Section 8.1.2, involve significant development. However, as discussed in Section 5.6, of this PEIR, subsequent projects implemented in accordance with the MPUPlans could result in impacts to known prehistoric or historic resources (both archaeological and built environment) and those not yet found and formally recorded. Impacts would be associated with grading of original in situ soils that could expose buried archaeological resources and features or alterations to historic structures.

The Mitigation Framework set forth in Section 5.6 of this PEIR requires that prior to implementation of subsequent projects implemented in accordance with the MPUPlans, the potential presence of archeological resources must be evaluated. If resources are present, they would be avoided or permanently curated (refer to MM-HIST-1a). In addition, impacts to historic resources would be avoided through the implementation of MM-HIST-1b.

Cumulative projects within the region have been or would be subject to similar review and requirements related to the protection of cultural resources. Cumulative projects that involve grading would be subject to similar mitigation to protect declining archeological and historic resources. Mitigation, required by each of the past, present, and reasonably foreseeable projects, would reduce cumulative impacts to below a level of significance.

8.2.7 Human Health/Public Safety/Hazardous Materials

8.2.7.1 On-Site Contamination and Hazardous Materials

As discussed in Section 5.7 of this PEIR, a review of regulatory agency databases and records review found sites of potential environmental concern within the study area. Several of the identified sites would not present a hazard to the public or environment either due to their location away from the study area or in areas that would not be impacted by subsequent projects implemented in accordance with the Plans. However, impacts were identified related to the presence of unexploded ordnance (UXO) associated with the former Camp Elliott. Therefore, the geographic scope of cumulative impact analysis for this issue would encompass the 30,000-acre former Camp Elliott. Former Camp Elliott areas are located within the West Sycamore, Mission Gorge, East Elliott, and Fortuna Mountain areas. Subsurface clearance of UXO has not been completed within the Camp Elliott Formerly Used Defense Site. As such, further efforts would be required to clear the area of UXO hazards.

MM-HAZ-2 (see Section 5.7) would require subsurface clearing of UXO prior to initiating subsequent projects under the Plans within these areas. This mitigation would reduce direct impacts to a less than significant level. As a result, the project would not contribute to a cumulatively considerable impact. In addition, future projects within the Camp Elliott Formerly Used Defense Site, such as the Castlerock project, would similarly be required to clear the area of subsurface hazards prior to land disturbance. As a result, cumulative impacts related to UXO hazards would be less than significant.

As the Plans would not involve the handling, transport, disposal, or release of hazardous substances (other than standard cleaning supplies associated with restroom facilities), the project would not result in a cumulatively considerable contribution to impacts related to the handling, transport, disposal, or release of hazardous substances. Cumulative impacts would be less than significant.

8.2.7.2 Fire Hazards

As discussed in Section 5.7 of this PEIR, subsequent projects implemented in accordance with the Plans would be associated with wildfire hazards due to the existing urban land use patterns surrounding the Park and the highly flammable vegetation contained within it. Due to the unpredictable and damaging nature of a wildfire, the entirety of the undeveloped portions of the County would be considered the cumulative impact area for fire hazard impacts. Implementation of the Mitigation Framework MM-HAZ-1 would ensure that appropriate brush management activities would occur to reduce impacts associated with wildfire to less than significant levels. Cumulative projects would be subject to similar review to ensure wildfire hazards are addressed. Development projects typically implement brush management plans based on requirements of the Land Development Code, and approval by the Fire Department. In addition, Fire Code standards of construction and land development are applied. Based on compliance with these existing regulations intended to protect people and structures from wildfire, a significant cumulative impact would not occur.

8.2.8 Hydrology and Water Quality

For purposes of this analysis, the geographic scope of cumulative analysis for this issue includes the San Diego River and Los Peñasquitos Creek watersheds, which are the two watersheds the study area is within. As discussed in Section 5.8 of this PEIR, subsequent projects implemented in accordance with the Plans would be required to demonstrate that they would not substantially or adversely impact existing drainage patterns, increase runoff, or create flood hazards on-site or downstream. The mitigation framework (MM-HYD/WQ-1 and MM-HYD/WQ-2) sets forth a process for these projects to follow, such as storm water best management practices and management of hydrologic conditions through detention basins.

Other discretionary projects within the study area watersheds would be similarly mandated by existing regulations, such as the National Pollutant Discharge Elimination System (NPDES) permit requirements, Federal Emergency Management Agency floodplain regulations, and applicable requirements of the Municipal Code of the City and equivalent requirements of other jurisdictions, to address and mitigate for impacts to hydrology and water quality resulting from runoff, drainage, and pollutants. As a result, cumulative impacts related to this issue area would be less than significant.

8.2.9 Geology and Soils

The geographic scope of the cumulative impact analysis for geology is limited to the immediate area of the geologic constraint, with the exception of some geologic impacts that are regional, such as earthquake risk. As discussed in Section 5.9 of this PEIR, subsequent projects implemented in accordance with the Plans would result in less than significant impacts associated with geologic hazards after implementation of mitigation framework MM-GEO-1. The framework requires subsequent projects to adhere to the City's Seismic Safety Study, the California Building Code, and regulations within the Land Development Code. Subsequent projects implemented in accordance with the Plans would also result in less than significant impacts associated with erosion after implementation of the Mitigation Framework MM-GEO-2, which requires these projects to adhere to grading regulations and NPDES permit requirements to the satisfaction of the City Engineer. Finally, the Plans do not involve the development of any habitable structures and therefore would not cumulatively contribute to the exposure of people or structures to seismic-related hazards.

Other cumulative projects would be similarly required to follow standard construction and engineering practices, grading regulations, and NPDES requirements to ensure geologic impacts would be reduced to a less than significant level. As a result, the Plans would not result in a cumulative impact related to geology and soils.

8.2.10 Paleontological Resources

The geographic scope for the cumulative analysis of paleontological resources includes the Peninsular Ranges regions within southern California, which the study area is within and would contain similar resources. As discussed in Section 5.10, subsequent projects implemented in accordance with the Plans would result in less than significant impacts to paleontological resource

with adherence to Mitigation Framework MM-PALEO-1San Diego Municipal Code (SDMC) Section 142.0151 - Paleontological Resources Requirements for Grading Activities, which applies to all projects that involve grading which could affect paleontological resources. The City and other jurisdictions within the region consider the potential impacts to paleontological resources during discretionary project review and require mitigation measures when warranted bybased on the potential for impacts to the underlying geologic formation and depth of subsurface disturbance. As all discretionary projects within the region, including projects implemented in accordance with the Plans, considerimplementation of the General Grading Guidelines for Paleontological Resources, as required by the SDMC Section 142.0151, would preclude potential impacts to paleontological resources and mitigate when warranted, As such, cumulative impacts related to this issue area are less than significant.

8.2.11 Transportation/Circulation

As discussed in Section 5.11, implementation of certain subsequent projects contemplated by the MPUPlans such as proposed parking areas would accommodate visitors to the Park, rather than generate new trips by accommodating new growth in the region. Nonetheless, a worst case analysis was completed to identify the trips that would be generated by the proposed parking areas, assuming they were all new trips (Refer to Appendix H of this PEIR). Accordingly, the Plans would not contribute to any cumulative impact related to the capacity of area roadways.

Mitigation Framework MM-TRAF-1 would be implemented to address potential impacts related to circulation movements and effects on existing public access points in relation to the parking area recommendations. As these impacts would be highly localized to the four locations where the parking areas are recommended, and no other projects have been identified that would exacerbate circulation or access issues at these locations, cumulative impacts would not occur. Regarding parking-related impacts, the project would result in a net benefit to the availability of parking, reducing demand for parking in neighboring residential areas and increasing accessibility to the Park. As a result, the Plans would not contribute to a cumulative parking impact. Finally, as the project would not conflict with adopted policies, plans, or programs supporting alternative transportation modes and other discretionary projects in the area would be required to comply with applicable policies and plans, cumulative impacts related to alternative transportation would be less than significant.

8.2.12 Public Services

As discussed in Section 5.12, implementation of the Plans would not be associated with an increased demand for police services, fire protection services, or parks because the project would not accommodate growth that would result in an increase in regional population and demand for services. As such, new services would not be required as a result of the project and there would be no associated cumulative impact associated with the construction of public facilities.

8.2.13 Public Utilities

As discussed in Section 5.13, implementation of the Plans would not result in a need for new public utility systems, or require substantial alterations to existing utilities, including water, wastewater, reclaimed water, solid waste disposal, storm water infrastructure, and communication systems, the construction of which would create physical impacts. However, impacts were identified related to potential conflict between the construction and maintenance of utilities and the management and preservation of natural resources and recreational opportunities in the Park. MM-UTIL-1 would be applied to subsequent projects implemented in accordance with the Plans to ensure that potential utilities conflicts would not occur. As the mitigation would specifically address potential conflicts with utilities located within the Park, it would not be associated with a cumulative impact related to physical impacts associated with the construction of utilities. As a result, cumulative impacts related to public utilities would be less than significant.



Chapter 9 Effects Found Not to Be Significant

Pursuant to California Environmental Quality Act—CEQA Guidelines Section 15128, this section describes the environmental issue areas that would not have the potential to result in significant impacts resulting from implementation of the Master Plan Update (MPU) and Natural Resources Management Plan (NRMP) (collectively, the Plans for the Mission Trails Regional Park Park. The issue areas were based upon initial environmental review included in the Notice of Preparation Scoping Letter (see Appendix A).

9.1 Agriculture and Forestry Resources

The project area does not support and has not historically supported agricultural operations or forestry resources. Based on a review of the State Farmland Mapping and Monitoring Program (FMMP) Important Farmland Maps, the study area is designated as "Grazing Land" and "Other Land." The FMMP defines Grazing Land as "land on which the existing vegetation is suited to the grazing of livestock." Other Land is defined as "land not included in any other mapping category. Common examples include low density rural developments, brush, timber, wetland, and riparian areas not suitable for livestock grazing, confined livestock, poultry, or aquaculture facilities, strip mines, borrow pits, and water bodies smaller than 40 acres. Vacant and nonagricultural land surrounded on all sides by urban development and greater than 40 acres is mapped as Other Land (State of California 2014b)." The study area does not support forest land as defined in PRC Section 12220(g) or timberland as defined by Government Code Section 51104(g).

Although the study area could support the grazing of livestock, this use would generally not be compatible with the existing and planned use of the study area as a regional park or supportive of the NRMP management actions intended to support sensitive biological habitats. While some soil types in the lower river valley areas of the study area would be considered suitable agricultural soils, implementation of the Plans would not adversely impact such soils, as it will remain a regional park providing recreational open space and biological habitat. These soils would remain undisturbed and

any limited development of recreational facilities contemplated by the <u>MPU_Plans_would</u> not substantially impact prime agricultural soils or FMMP farmland.

Although the study area does not support agricultural or forestry uses, and the Plans do not envision future agricultural or forestry uses within the study area, implementation of the Plans would not preclude agricultural or forestry uses through large scale development or removal of soils. For these reasons, impacts regarding agricultural or forestry resources would be less than significant.

9.2 Mineral Resources

The California Geological Survey, formerly the California Division of Mines and Geology, classifies the regional significance of mineral resources in accordance with the California Surface Mining and Reclamation Act of 1975 and designates lands containing significant aggregate resources. Mineral resource zones have been designated to indicate the significance of mineral deposits. The study area is primarily designated as Mineral Resource Zone 2 (MRZ-2), with a few smaller areas designated MRZ-3. MRZ-2 is designated on lands where significant mineral deposits are present or where it is judged that a high likelihood for their presence exists. Lands classified as MRZ-3 are areas of undetermined mineral resource significance (State of California 2014c). Although large portions of the study area have the potential to contain mineral resources, implementation of the Plans would not impact these mineral resources because the resource would continue to remain available.

For example, subsequent projects contemplated by the Plans do not include any residential or commercial land development that would preclude the extraction of underlying mineral resources, nor would they introduce an incompatible use that would reduce the feasibility of future mineral resource extraction. With the exception of limited physical improvements within the study area, such as proposed parking areas and recreational amenities (shade structures, park benches, etc.), the availability of mineral resources in the study area would largely remain as it exists today. An existing mineral extraction site west of the study area (Superior Mine) would not be adversely impacted, as the Park would continue to be compatible with extraction activities subsequent to implementation of the Plans. Although the Plans do not envision future mineral extraction activities in the study area, the subsequent projects contemplated by the Plans would not preclude mineral resource extraction. As a result, impacts to mineral resources would be less than significant.

9.3 Noise

Noise is defined as unwanted or objectionable sound. Noise impacts resulting from a project generally occur if a significant increase in ambient noise levels would occur or people would be exposed to noise levels in excess of the City's noise ordinance or noise levels are incompatible with Table NE-3, Land Use – Noise Compatibility Guidelines (2015). In addition, noise impacts can result from exposure of people to transportation noise, including aircraft noise. The Plans would provide for the management of the Park's natural resources and allow for the development of recreational amenities within the Park. Implementation of the NRMP activities would not be characterized as

noise producing as they would consist of biological monitoring activities, hand weeding, and other habitat management activities that would not generate a significant amount of noise.

Some of the subsequent projects contemplated by the MPU-Plans would be associated with short-term construction activities that would generate minimal noise from construction equipment. The installation of park furniture would not require the use of heavy construction equipment that would generate a substantial amount of noise. However, construction of parking areas as well as activities required for trail maintenance and creation may require the use of trail building equipment, and other construction equipment such as loaders and pavers. While these activities would generate short-term noise, the noise would be intermittent and would occur at distance from any habitable structures or other noise receptors. Potential noise impacts to sensitive species would be addressed at the time subsequent projects are implemented, as further detailed in the mitigation framework within Sections 5.1, Land Use, and 5.4, Biological Resources. Due to the intermittent nature of the noise generation and the distance to sensitive noise receptors, construction activities would not result in significant noise impacts with adherence to the mitigation framework.

In addition, implementation of the Plans would not generate traffic noise because additional trips would not be added to roadways within the study area. Subsequent projects contemplated by the MPUPlans, such as parking areas, would redistribute a small amount number of existing trips around the study area, but would not change existing noise levels. Overall, noise impacts would be less than significant.

9.4 Population and Housing

Implementation of the Plans would not induce population growth either directly or indirectly, as detailed in Chapter 7, Growth Inducement. The Plans would generally serve to accommodate the recreational needs of the existing population and the recreational needs associated with a growing population, but would not induce new growth. In addition, implementation of the Plans would not displace any existing housing that could necessitate the construction of replacement housing in another area. For these reasons, impacts related to population and housing would be less than significant.



Chapter 10 Project Alternatives

The California Environmental Quality Act—CEQA Guidelines Section 15126.6 requires that an environmental impact report (EIR) compare the effects of a "reasonable range of alternatives" to the effects of a project. The alternatives selected for comparison should be those that would attain most of the basic project objectives and avoid or substantially lessen one or more significant effects of the project. The "range of alternatives" is governed by the "rule of reason," which requires the EIR to set forth only those alternatives necessary to permit an informed and reasoned choice by the lead agency and to foster meaningful public participation (CEQA Guidelines Section 15126.6[f]). CEQA generally defines "feasible" to mean an alternative that is capable of being accomplished in a successful manner within a reasonable period of time, while also taking into account economic, environmental, social, technological, and legal factors.

The alternatives addressed in this Program Environmental Impact Report PEIR were selected in consideration of one or more of the following factors:

- The extent to which the alternative would feasibly accomplish most or all of the basic objectives of the Master Plan Update (MPU) and Natural Resources Management Plan (NRMP) (collectively, the Plans;
- The extent to which the alternative would avoid or substantially lessen any of the identified significant environmental effects of the Plans;
- The feasibility of the alternative, taking into account site suitability, economic viability, availability of infrastructure, general plan consistency, and consistency with other applicable plans and regulatory limitations;
- The appropriateness of the alternative in contributing to a "reasonable range" of alternatives necessary to permit a reasoned choice; and

• The requirement of the CEQA Guidelines to consider a "no project" alternative; and to identify an "environmentally superior" alternative in addition to the no project alternative (Section 15126.6[e]).

As discussed in Chapter 5, the Plans would not result in any significant and unmitigable impacts. In developing the alternatives to be addressed in this section, consideration was given regarding their ability to meet the basic objectives of the Plans and eliminate or substantially reduce significant environmental impacts.

As detailed in Chapter 3, Project Description, the Plans address the long-term protection of natural resources and development goals in support of recreation and interpretation within the Mission Trails Regional Park (Park). For the purposes of this PEIR, the goals of the Plans are the objectives of the Project as defined by the CEQA Guidelines:

- 1. Provide a structure for ongoing land and resource management actions required to maintain the Park and protect its resources.
- 2. Identify unsafe or unsustainable sections of recreational trails and provide guidance for the types of management action required.
- 3. Identify missing or constrained linkages within the Park and providing new or alternative routes to improve the recreational connectivity while protecting the Park's natural and cultural resources.
- 4. Integrate the management actions identified in the NRMP with the recreational trails network throughout the Park.
- 5. Provide amenities that support the recreational uses that currently exist or are proposed as part of the MPU.

This chapter identifies alternatives that were eliminated from further consideration and reasons for dismissal, and analyzes the No Project and the Reduced Project alternatives in comparison to the potential environmental impacts associated with the Plans (Table 10-1). Following the description of each alternative, the chapter evaluates the environmental impacts of the alternative.

Table 10-1			
Comparison of Alternatives to the Project			
	Proposed		Reduced Project
Environmental Issue	Project	No Project Alternative	Alternative
Land Use	SM	Greater than the Project (SM)	Less than the Project (SM)
Visual Effects and Neighborhood Character	LS	Greater than the Project (LS)	Less than the Project (LS)
Air Quality	LS	Same as the Project (LS)	Less than the Project (LS)
Greenhouse Gas Emissions	LS	Same as the Project (LS)	Less than the Project (LS)
Biological Resources	SM	Greater than the Project (SM)	Less than the Project (SM)
Historical Resources	SM	Same as the Project (SM)	Less than the Project (SM)
Human Health/Public Safety/ Hazardous Materials	SM	Same as the Project (LS)	Same as the Project (SM)
Hydrology and Water Quality	SM	Greater than the Project (SM)	Less than the Project (SM)
Geology and Soils	SM	Greater than the Project (SM)	Less than the Project (SM)
Paleontological Resources	SM	Same as the Project (SM)	Less than the Project (SM)
Transportation/Circulation	SM	Greater than the Project (SM)	Same as the Project (SM)
Public Services	LS	Same as the Project (LS)	Less than the Project (LS)
Public Utilities	SM	Same as the Project (SM)	Less than the Project (SM)
LS = less than significant; SM = significant and mitigable; SU = significant and unavoidable.			

10.1 Alternatives Considered But Rejected

City staff has considered a range of potential project alternatives based on public and agency input. These alternatives have consisted of a number of trails and facilities proposals ranging from complete closure to public access of many areas of the park to the development of miles of new roads and trails associated with new active recreation use areas. Many of these ideas were used to shape the Plans.

The preservation of the Park entirely as biological open space, precluding any recreational use, was considered but rejected by the City as not meeting the project objective of providing recreational resources to serve a growing and diverse population. Likewise, a proposal for increased development of active sports fields and a substantial expansion of the existing trails and roads network was considered but rejected by the City as not meeting the project objective of complying with the Multiple Species Conservation Program (MSCP) and numerous environmental laws and regulations. The ultimate goal of the Plans is to find an ideal balance between the accommodation of a diverse array of recreational activities and the protection and preservation of natural open space for the enjoyment of current and future generations of residents and visitors to the City.

10.2 No Project Alternative

10.2.1 Description

The No Project Alternative would include limited implementation of the 1985 Master Plan, which provides guidance for the development of an urban regional park to meet current and future recreational, educational, and cultural needs of the San Diego region. The No Project Alternative

represents limited implementation of the 1985 Master Plan because a number of proposals in the 1985 Master Plan for construction of structures and amenities would no longer be feasible under the existing regulatory framework since current regulations provide additional protections for biological resources compared to when the 1985 Master Plan was adopted. For example, restrictions under the City of San Diego MSCP Subarea Plan Environmentally Sensitive Lands (ESL) Regulations and brush management regulations would restrict development of some of the larger uses identified in the 1985 Master Plan such as a multi-use center in the West Fortuna area, an interpretive center in East Fortuna area, and multiple developed day use and camp areas. Proposals in the 1985 Master Plan that could be implemented under the existing regulatory framework include the extension of Clairemont Mesa Boulevard and Jackson Drive into the Park boundaries, providing connections to Mission Gorge Road.

More specifically, since adoption of the 1985 Master Plan, areas within and surrounding the Park have taken on greater significance as a core area for the region's sensitive biological resources and are subject to greater levels of protection under the City of San Diego MSCP Subarea Plan. Although proposed passive recreational uses envisioned by the 1985 Master Plan would be considered compatible with the Subarea Plan (Multi-Habitat Planning Area [MHPA] Guideline B10), development of the larger future uses would not be allowed under the current MSCP. For example, Subarea Plan MHPA Guideline B4 states that "[A] condition of coverage for San Diego ambrosia requires 90 percent preservation of the population at the Mission Trails Regional Park site". This requirement creates environmental constraints beyond what existed when the existing Master Plan was approved in 1985 and limits full implementation of all proposals in the existing Master Plan.

Under the No Project Alternative, the proposed Plans would not be adopted by the City and the integrated set of management guidelines focusing on public access and recreation under the MPU and natural resources under the NRMP would not be implemented. The expansion areas (East Elliott and West Sycamore-areas) would not be officially incorporated into the Park boundaries and the associated Community Plan amendments would not occur. Under the No Project Alternative, the Park would not be subject to the updated policies and management recommendations in the Plans that would minimize environmental impacts. The No Project Alternative would not provide updated management recommendations that would preserve sensitive biological resources within the Park, and unauthorized use of existing trails within the Park would continue. Implementation of the No Project Alternative would not provide updated management recommendations through an NRMP on City fee-owned property outside of the Park boundary; however, management obligations in accordance with the MSCP Implementing Agreement to maintain barriers and prevent entry into areas with sensitive biological resources would continue. Unauthorized trails on City fee-owned property outside of the Park boundary have been closed and would continue to be enforced for closure by City Park Ranger staff. These efforts include enforcement on City fee-owned environmentally sensitive areas, posting of signs prohibiting public access to areas that are closed or under habitat restoration, and erecting informational barricades where necessary to reduce and eliminate unauthorized trail use/access outside of the Park boundaries. Under the No Project Alternative, these efforts by City Park Ranger staff would continue without the benefit of the MPU policies and recommendations, and resource management recommendations contained in the NRMP. Private property owners would continue to have the right to defend their property from unauthorized trail trespass under the No Project Alternative.

10.2.2 Environmental Analysis

10.2.2.1 Impacts Similar to the Project

Under the No Project Alternative, park management and recreational improvements would continue under the existing 1985 Master Plan. While the No Project Alternative could include the extension of Clairemont Mesa Drive and Jackson Drive into Park boundaries, overall implementation of the 1985 Master Plan would still not create significant air quality and greenhouse gas (GHG) impacts since there would be limited sources of air or GHG emissions associated with continued implementation and management of trails and park amenities. Any emissions associated with vehicles using the roadway extensions would be existing trips and not new trips generated by the Master Plan. Thus, air quality and GHG impacts of the No Project Alternative would be less than significant, similar to the Project.

Implementation of the No Project Alternative would have the potential to result in direct impacts to sensitive historical and paleontological resources through grading and disturbance during construction. However, all development would be subject to compliance with existing Historical Resources Regulations which would protect historical resources and the existing mitigation measures associated with the 1985 Master Plan EIR. Additionally, discretionary development would be required to comply with the paleontological mitigation measures included in the General Plan EIR that require paleontological monitoring where grading exceeds a specified depth in moderate or high sensitivity formations. Therefore, impacts to historical and paleontological resources under the No Project Alternative would be less than significant with implementation of mitigation, similar to the Project.

Development of trails and other facilities under the No Project Alternative would have the potential to encounter hazardous materials, such as unexploded ordnance (UXO), during grading and construction. Development of the Park under the No Project Alternative would be subject to existing regulations regarding handling and disposing of hazardous materials and would implement applicable safety procedures where ground disturbance is required in areas with potential UXO. Therefore, impacts related to hazardous materials under the No Project Alternative would be similar to the Project.

Implementation of the No Project Alternative would not result in the expansion of public services; thus, impacts of the No Project Alternative would be less than significant. Similar to the Project, development of trails and other facilities under the existing Master Plan could require alteration of existing utilities and access roads or be located within the alignment of planned utilities and access roads. Development of the Park under the existing 1985 Master Plan would be subject to City review to evaluate potential conflicts with existing and planned utilities and develop appropriate measures to minimize impacts. Therefore, impacts under the No Project Alternative would be similar to the Project.

10.2.2.2 Impacts Greater Than the Project

Similar to the Project, implementation of the No Project Alternative could result in potential conflicts with the MHPA Land Use Adjacency Guidelines, such as construction noise or introduction of

recreational users. Additionally, continued management of the Park under the existing Master Plan would occur without proposed NRMP management actions which generally intend to reduce preserve-level threats to sensitive habitats and their species, thereby reducing impacts associated with MHPA Land Use Adjacency issues. Therefore, in the absence of implementation of specific actions identified in the NRMP that would provide biological enhancements to the Park and ensure consistency with the MHPA, the No Project Alternative would result in slightly greater impacts related to land use compared to the Project. Construction of the extensions of Clairemont Mesa Drive and Jackson Drive into Park boundaries would also create potential land use conflicts to a greater extent than the Project.

With respect to aesthetics, numerous MPU recommendations under the Project are generally intended to increase access to public vantage points and preserve significant viewsheds within the Park. Furthermore, some management actions under the Project may slightly improve the aesthetics of the Park by restoring natural areas. The No Project Alternative would result in continued management of the Park under the existing Master Plan which would not benefit from recommendations to enhance and restore areas of the Park. Additionally, the No Project Alternative could allow the extension of Clairemont Mesa Drive and Jackson Drive into Park boundaries and construction of additional recreational amenities that could detract from the natural visual resources within the Park. Although visual impacts under the No Project Alternative would likely be less than significant with appropriate design, the No Project Alternative would still result in greater impacts related to aesthetics when compared to the Project due to the potential introduction of roads into the Park.

Similar to the Project, implementation of the No Project Alternative would result in impacts to biological resources associated with construction of trails and associated amenities. Additionally, the two roads could be constructed within Park boundaries that would significantly impact biological resources. However, impacts associated with development of trails, roads, and other Park facilities under the existing Master Plan could be reduced to less than significant through adherence to the MSCP, ESL Regulations, and appropriate mitigation measures consistent with the City's Biology Guidelines contained in the Land Development Manual. However, the No Project Alternative would not benefit from the policies and recommendations included in the Plans that would improve biological conditions compared to the existing condition. <u>Under the No Project Alternative, the Citv</u> would still be obligated to comply with management goals and objectives of the MSCP Subarea Plan along with Implementing Agreement conditions; however, tThe No Project Alternative would not benefit from proposed trail closures or the management recommendations contained in the MPU and NRMP. For example, under the No Project Alternative, future management of the Park would not benefit from the adaptive management strategies identified in the NRMP addressing no management actions would be undertaken to protect and enhance habitats for sensitive plant species such as San Diego thornmint, -or San Diego ambrosia, and -and no management actions would be taken to protect-sensitive species (e.g., bats) that occupy cliff dwelling and rocky outcrops. Therefore, impacts to biological resources under the No Project Alternative would be greater than those of the Project.

The No Project Alternative would also not benefit from the various MPU recommendations and policies generally intend to improve hydrology (e.g., rerouting trails with erosional issues) and geological conditions (e.g., reduce Park user encroachment into landslide susceptible areas). The No

Project Alternative would also not benefit from the management actions outlined in the NRMP that would generally improve hydrologic conditions due to the restoration of natural areas. Development of trails and other park facilities under the existing Master Plan would occur without these MPU recommendations and NRMP management actions, but would be required to comply with existing Municipal Separate Storm Sewer System requirements and the San Diego Municipal Code which would ensure impacts related to hydrology and water quality and geologic conditions would be less than significant under the No Project Alternative, similar to the project. However, while the City acknowledges its continued enforcement of trail closures on City fee-owned property, in the absence of the management recommendations of the Project, the No Project Alternative would result in greater impacts related to hydrology, water quality, and geologic conditions, compared to the Project.

The MPU contains numerous policies that generally intend to improve recreational circulation and access within the Park (e.g., new access points and parking areas). Under the No Project Alternative, trail improvements and associated access improvements could also occur, but would not provide the same level of connectivity and access as the Project. In addition, the No Project Alternative would allow extensions of Clairemont Mesa Boulevard and Jackson Drive into Park boundaries. Any road extension would only be proposed if it would improve circulation and access; thus, impacts of these extensions in relation to circulation and access is assumed to be less than significant. The No Project Alternative would not benefit from the proposed trails network in the proposed Park expansion areas of East Elliot and West Sycamore. Thus, authorized recreational connectivity would be reduced under the No Project Alternative, although unauthorized access would likely continue. Therefore, impacts under the No Project Alternative would be slightly greater than the Project.

10.2.3 Conclusion

Implementation of the No Project Alternative would not avoid any of the identified significant and mitigable impacts of the Project, nor would it reduce any impacts associated with the Project. The No Project Alternative would also slightly increase impacts associated with land use, visual effects, biological resources, traffic/circulation, hydrology/water quality, and geology/soils.

In addition, this Alternative would not meet any of the Project objectives as the existing Master Plan does not include the MPU recommendations that provide a structure for ongoing land and resource management actions and establish a framework for identifying unsafe or unsustainable sections of recreational trails. The existing Master Plan does not include an NRMP, which includes management actions necessary to improve biological resource conditions.

10.3 Reduced Project Alternative

10.3.1 Description

Under the Reduced Project Alternative, the proposed trail plan would be modified within the East Elliot area. The proposed trail plan for all other areas would remain the same. Adoption of the NRMP would occur under this Alternative, similar to the project. The Reduced Project Alternative was developed based on input provided by California Department of Fish and Wildlife and United States

Fish and Wildlife Service (Wildlife Agencies). The Reduced Project Alternative would remove the proposed Sycamore Canyon connection and the trail alignment that would extend along the western boundary of the Park. This trail is shown on Figure 3-8 of the PEIR associated with Recreation Recommendation R4. This would result in two smaller trail loops in the western portion of the East Elliot area. The Wildlife Agencies requested the removal of these trail components to protect existing intact habitat, decrease the potential for the incursion of exotics species, and avoid disruption of wildlife movement, restriction of wildlife refuge areas, and negative effects to wildlife composition. Similarly, the Wildlife Agencies requested removal of the trail alignment that would pass through the Oak Canyon/State Route 52 area due to the potential for human-caused habitat disturbances to alter wildlife movement through this area. The Reduced Project Alternative would also remove the proposed east-west trail alignment south of Sycamore Landfill and would result in a reduction of associated trail amenities due to elimination of trails. The smaller footprint of the Reduced Project Alternative would reduce the amount of recreational use areas that would be constructed compared to the Project and increase the amount of land preserved as natural habitat.

As with the Project, subsequent projects implemented under the Reduced Project Alternative would be required to demonstrate consistency with biological resources regulations ESL Regulations and associated Biology Guidelines, such as the MSCP Subarea Plan and MHPA Land Use Adjacency Guidelines, or and the Historical Resources Regulations for archaeological sites. Overall, this Alternative would result in similar impacts as the Project, but the overall acreage of land disturbance would be reduced due to the lesser amount of development. Under the Reduced Project Alternative, the City would still be obligated to maintain barriers and prevent entry into areas with sensitive biological resources in accordance with the MSCP Implementing Agreement. These efforts include enforcement on City fee-owned environmentally sensitive areas, posting of signs prohibiting public access to areas that are closed or under habitat restoration, and erecting informational barricades where necessary to reduce and eliminate unauthorized trail use/access outside of the Park boundaries.

10.3.2 Environmental Analysis

10.3.2.1 Impacts Less Than the Project

Similar to the Project, implementation of the Reduced Project Alternative could result in potential conflicts with the MHPA Land Use Adjacency Guidelines, such as construction noise or introduction of recreational users. The Reduced Project Alternative would also include the NRMP management actions that would generally reduce preserve-level threats to sensitive habitats and their species, thereby reducing impacts associated with MHPA Land Use Adjacency issues. As there would be fewer subsequent projects implemented under the Reduced Project Alternative, it would slightly reduce impacts related to land use compared to the Project.

Implementation of the Reduced Project Alternative could slightly reduce the cumulative effects on the visual character of the Park compared to the Project. Under this Alternative, reduction in proposed trails compared to the Project would result in less land disturbance and preserve the existing visual character to a greater degree. Although this Alternative would reduce access to scenic view points for recreational users of the Park, preservation of additional acreage of native vegetation and landform would likely reduce impacts on visual character as compared to the Project.

Air quality and GHG emission sources associated with implementation of the Project would be limited to emissions from construction of subsequent projects, which was determined to be less than significant within Sections 5.3 and 5.4 of this PEIR. The Reduced Project Alternative would reduce air quality and GHG emissions slightly primarily due to reduced construction equipment emissions associated with fewer trails and associated amenities. Therefore, when compared to the Project, the Reduced Project Alternative would slightly reduce air quality and GHG emissions, and impacts would be less than significant under both the Project and this Alternative.

Implementation of the Reduced Project Alternative would reduce impacts on biological resources compared to the MPU. Under this Alternative, construction of fewer trails and associated amenities would in turn decrease the potential for impacts on sensitive species. Additionally, the reduction in trails would reduce impacts associated with habitat fragmentation and disruption of wildlife movement. Compared to the proposed project, the elimination of the new trail alignment that would pass through the Oak Canyon/State Route 52 area would reduce potential human-caused habitat disturbances that could affect wildlife movement through this area—since. Use of recreational facilities would be further minimized, thus reducing the potential for indirect biological impacts. While the City acknowledges its continued enforcement of trail closures on City fee-owned property, The Reduced Project Alternative would result in significant impacts, the same as the project, and would be subject to the same mitigation measures identified in Section 5.5. Overall, impacts would be slightly reduced compared to the Project.

Implementation of the Reduced Project Alternative would reduce potential impacts on historical, archaeological, and paleontological resources compared to the Project. Fewer trails and recreational amenities would in turn reduce the amount of soil disturbance and potential to encounter historical resources. The Reduced Project Alternative would result in significant impacts, the same as the project, and would be subject to the mitigation identified in Sections 5.6 and 5.10. Overall, impacts would be slightly reduced compared to the Project.

Implementation of the Reduced Project Alternative would reduce the extent of grading and potential disturbance of UXO or other hazardous material sites compared to the Project due to fewer trails and associated amenities. The Reduced Project Alternative would result in significant impacts, the same as the project, and would be required to adhere to the mitigation identified in Section 5.7. Overall, impacts would be slightly reduced compared to the Project.

Various MPU recommendations and policies proposed for the Project generally intended to improve hydrology (e.g., rerouting trails with erosional issues) and geological conditions (e.g., reduce Park user encroachment into landslide susceptible areas) within the Park would be preserved under the Reduced Project Alternative. Fewer trails and associated amenities would also slightly reduce these impacts by reducing the extent of grading. Subsequent projects under this Alternative would still be required to adhere to the mitigation identified in Section 5.8 and the regulatory framework addressing geologic conditions described in Section 5.9. Overall, impacts would be slightly reduced compared to the Project.

Implementation of the Project would not result in the expansion of public services, and the Reduced Project Alternative would slightly reduce the potential for impacts, as fewer trails and recreational amenities would result in fewer people using the Park, which would in turn lower the potential for additional public services such as police and fire rescue.

The potential exists that construction and grading for amenities such as trails, parking areas, and other subsequent projects implemented in accordance with the MPUPlans could be in areas with underlying utilities or within an existing or planned City utility access paths. Potential relocation of existing utilities or an existing or planned access road is considered to be a significant impact. Implementation of the Reduced Project Alternative would slightly reduce these impacts, as it would reduce the extent of grading due to fewer trails and associated amenities. Subsequent projects under this Alternative would still be required to adhere to the mitigation identified in Section 5.13. Overall, impacts would be slightly reduced compared to the Project.

10.3.2.2 Impacts Similar to the Project

It is not anticipated that the reduced number of trails and associated amenities under the Reduced Project Alternative would decrease the number of patrons visiting the Park. Consequently, traffic volumes associated with the Reduced Project Alternative would be similar to those anticipated for the Project. Policies that generally intend to improve circulation and access within the Park (e.g., new access points and parking areas) would be preserved under the Reduced Project Alternative. Similarly, the Reduced Project Alternative would include all of the parking areas proposed under the Project and it would be required to adhere to the mitigation identified in Section 5.12. Therefore, impacts related to circulation and access would likely be similar under this Alternative compared to the Project.

10.3.3 Conclusion

Although the Reduced Project Alternative would slightly reduce impacts associated with land use. visual effects, air quality, greenhouse gas emissions, biological resources, historical resources, hydrology and water quality, geology and soils, paleontological resources, public services, and public utilities, it would not fully meet the project objectives as it would remove a key point of connectivity (Sycamore Canyon) and the trail alignment that would extend along the western boundary of the Park, reducing trail access for Park patrons, and as such would not meet the objective to "provide new or alternative routes to improve the recreational connectivity while protecting the Park's natural and cultural resources." avoid any of the identified significant impacts of the Project, this Alternative would slightly reduce impacts associated with land use, visual effects, air quality, greenhouse gases, biological resources, historical resources, human health/public safety/hazardous materials, hydrology and water quality, geology and soils, paleontological resources, public services, and public utilities. Impacts related to traffic and circulation would be similar. HoweverFurthermore, this Alternative would likely result in less usable areas of the Park, which would not fully meet the objective of providing new or alternative routes to improve the recreational connectivity of the region. Therefore, while this Alternative would slightly reduce the severity of potential impacts, it would not fully meet the objectives of the Project. Exclusion of the proposed Sycamore Canyon connection and the trail alignment that would extend along the western boundary of the Park would remove a key point of connectivity and reduce trail access for Park patrons. Although the Wildlife

Agencies requested removal of those components to reduce potential impacts on biological resources, implementation of mitigation measures BIO-1 through BIO-83 would reduce impacts to biological resources associated with the Project to less than significant. Consequently, the Project objective to "provide new or alternative routes to improve the recreational connectivity while protecting the Park's natural and cultural resources" is better met by the Project.

10.4 Environmentally Superior Alternative

CEQA Guidelines Section 15126.6(e)(2) requires that an EIR identify which alternative is the environmentally superior alternative. If the No Project Alternative is the environmentally superior alternative, the EIR must also identify which of the other alternatives is environmentally superior. Based on the analysis of the other alternatives considered, the Reduced Project Alternative would be the environmentally superior alternative because it would slightly reduce impacts associated with land use, visual effects, air quality, greenhouse gases, biological resources, historical resources, human health/public safety/hazardous materials, hydrology and water quality, geology and soils, paleontological resources, public services, and public utilities.

The Reduced Project Alternative would still contain updated recommendations necessary to provide a structure for ongoing land and resource management and establish a framework for identifying unsafe or unsustainable sections of recreational trails. The NRMP would still be implemented, which would in turn serve to protect biological and cultural resources within the Park. However, as described in Section 10.3.3 above, the Reduced Project Alternative would not meet the project objective to "provide new or alternative routes to improve the recreational connectivity while protecting the Park's natural and cultural resources." Specifically, this Alternative would not make critical trail connections (the Sycamore Canyon connection and the trail alignment that would extend along the western boundary of the Park) that would be provided by the Project.



Chapter 11 References

The following documents were used, referenced, or relied on in preparing this PEIR, and the documents are available for public review and inspection at the City of San Diego. Some documents are additionally available for review on the City of San Diego website page at www.sandiego.gov.

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Chapter 12 Individuals and Agencies Consulted

Agencies and individuals contacted during preparation of the EIR include the following:

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U.S. Fish and Wildlife Service

- David Zoutendyk, Division Chief
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Chapter 13 Certification

This document has been completed by the City's Environmental Section under the direction of the Planning Department Deputy Director and is based on independent analysis and determinations made pursuant to the San Diego Land Development Code Section 128.0103.

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