Appendix O1
Transportation Impact Study

Carlton Oaks Country Club and Resort

Draft Transportation Impact Study
May 6, 2025

City of San Diego PTS # 645381

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Executive Summary

The purpose of this Transportation Impact Study (TIS) is to identify and document any significant transportation related impacts associated with the development of the proposed Carlton Oaks Country Club and Resort (Proposed Project), and to recommend mitigation measures for identified impacts, as necessary.

ES.1 Project Description

The Proposed Project is located at 9200 Inwood Drive, which is on the south side of Carlton Oaks Drive and the east side of West Hills Parkway. The total project area, which includes all proposed development, encompasses approximately 169 acres. The Project is located within the Carlton Oaks Country Club property as described in the General Plan. A portion of the site is designated as a Planned Development and the other portion is designated as open space/recreation. It should be noted that portions of the open space/recreation (golf course) are located within both the City of Santee and the City of San Diego however, the land uses located within the City of San Diego will remain the same and are consistent with the respective cities' general plan.

Since the Proposed Project's study area includes transportation facilities located in the City of Santee and the City of San Diego, the standards from each jurisdiction were applied to their respective transportation facilities. Transportation facilities located within the City of Santee were evaluated utilizing City of Santee standards. Similarly, transportation facilities located within the City of San Diego were evaluated utilizing City of San Diego standards.

The Proposed Project is proposing to redevelop the existing Country Club and 52-room hotel, into a recreational-oriented mixed-use resort community. The Proposed Project will include an improved golf course, clubhouse, hotel, pro shop, practice area, tournament hall, cart barn, learning center, and residential accessory uses. The following is a summary of the proposed project uses:

<u>Golf Course (Existing use that will be redeveloped)</u>

- Redesign of the existing 18-hole golf course (approximately 104 acres)
- Practice areas
- 1,258 square foot (SF) golf learning center
- 6,012 SF cart barn
- 1,258 SF exterior storage
- 1,200 SF pro shop
- 4,800 SF tournament hall

<u>Golf Clubhouse and Hotel/Cottages (Existing uses that will be redeveloped)</u>

- 50,695 SF Clubhouse and Hotel/Cottages
- 52 rooms (42 hotel rooms and 10 cottage style rooms)
- 3,675 SF of restaurant uses

<u>Residential area</u>

- 236 multi-family residential units
- 6 new single family units

In addition, one existing home located at 9225 Inwood Drive has also been included within the project area to allow for minor driveway modifications. No changes to this structure are proposed.

The residential and commercial land uses will be located in the City of Santee; and the Carlton Oaks Golf Course will be partially located in the City of San Diego and the City of Santee.

Access to the Proposed Project will be provided via two driveways:

- Project Driveway #1 – will be constructed along east side of West Hills Parkway, south of Carlton Oaks Drive, and will create the eastern leg of a new side-street stop-controlled intersection with full access. Improvements will be implemented by the Proposed Project to construct a turn pocket for the southbound left-turn movement to allow vehicles to safely enter the project driveway. One lane will be constructed for traffic entering the driveway and another for traffic exiting the driveway.
- Project Driveway #2 – will be constructed along the south side of Carlton Oaks Drive and will create the southern leg of the Burning Tree Way / Carlton Oaks Drive intersection with full access. This intersection will continue to operate as a side-street stop-controlled intersection with minor streets Burning Tree Way and Project Driveway #2 in the City of San Diego. One lane will be constructed for traffic entering the driveway and another for traffic exiting the driveway.

Two emergency access point wills also be provided. The first will be located at the southern leg of the Carlton Oaks Drive / Fanita Parkway intersection. This access point will be gated and not open to the public except during times of emergency. The emergency access will utilize the existing private driveway for the Calle Verde Condominiums. The second emergency access point will be along West Hills Parkway directly north of Driveway #2. This access will only be open during times of emergency as well.

The project will also provide a private utility/maintenance road between Residential West and Residential North that would also serve as a pedestrian/golf cart passageway connecting Residential West to the resort. This roadway would not be considered a fire apparatus access road but would be built to California Fire Code requirements and could be used as an emergency evacuation route, if needed.

Trail Segments

The San Diego River Trail is a regional Class I multi-use path that runs along the San Diego River and connects the Lakeside Baseball Fields to the western terminus of the City of Santee. Currently there is a gap in the trail between the intersection of Mast Boulevard/SR-52 eastbound ramps and the eastern proposed project boundary. The San Diego Association of Governments (SANDAG) has developed a plan to complete this portion of the San Diego River Trail by constructing it along the southern edge of the project site. A Mitigated Negative Declaration was adopted on June 16, 2017 (SANDAG 2017), and the bicycleway is currently in the engineering design phase; a construction schedule has yet to be set. The SANDAG segment would be funded through Transnet, the regional half-cent sales tax for transportation administered by SANDAG, although construction funds have not yet been identified. The segment of the San Diego River Trail that runs along the project boundary is not part of the proposed project, but the project applicant would continue to work with the City of Santee, City of San Diego, and SANDAG to ensure that the proposed project's design would not impede implementation of the trail.

As part of the proposed project, a multipurpose public trail would be provided on the northern side of the San Diego River, linking with existing and planned trails east and west of the site (termed the Project Trail Segment herein, see Figure 4.2). A portion of the Project Trail Segment on the eastern side of the project site would begin at the entrance of Residential North at Carlton Oaks Drive, traverse through the resort and along the southeastern border of the project site, and end slightly west of the jurisdictional line between the City of Santee and the City of San Diego. This portion of the trail would vary in width from 6 to 10 feet and be a decomposed granite path. Safety fencing, approximately 10 feet tall, would be constructed along the Project Trail Segment adjacent to the golf course. Additionally, this portion of the trail would link to the existing Mast Park West Trail and to the future planned trail known as the Carlton Oaks Golf Course Segment (SANDAG 2017).

A portion of the Project Trail Segment on the western side of the project site would be constructed beginning at the City of Santee's jurisdictional line and ending at the property line. This portion of the

trail would be 10 feet wide and consist of decomposed granite. Safety fencing would be constructed along the Project Trail Segment adjacent to the golf course. This portion of the trail would link to the future planned trail known as the Carlton Oaks Golf Course Segment. In addition, the project applicant would provide an Irrevocable Offer of Dedication for portions of the Carlton Oaks Golf Course Segment that are within the project site but are not being constructed by the project applicant; these sections would be provided on the project's subdivision map.

Along the Residential West boundary, a 14-foot-long graded bench (located within the Carlton Oaks Golf Course Segment) would be provided within the easement areas that the City of San Diego would grant to the applicant as part of this project.

In addition to the trail alignment currently proposed through Residential North and the resort area, a supplemental trail Offer of Dedication is shown on project site plan, should the City of Santee request this supplemental trail alignment. The supplemental trail Offer of Dedication is for a trail that would be 12 feet wide and start from an area east of the resort parking lot to the property line of the Vista del Verde community. The supplemental trail would be within the project development footprint analyzed in this EIR. The applicant is not proposing to construct this trail segment as part of the project, and this segment is only an alternative to the proposed Project Trail Segment located through the resort.

As part of its entitlement and permitting process, the Proposed Project requires the following approvals from each respective jurisdiction:

<u>City of Santee</u>

- Certification of Environmental Impact Report (EIR)
- Approval of Tentative Map
- Approval of the Development Review Permit
- Approval of 2 Conditional Use Permits for the golf course, country club and related uses
- Ministerial permits (building permit, grading permit, final map, etc.)

<u>City of San Diego</u>

- Site Development Permit – Process 3
- Ministerial permits (grading, etc.)

ES.2 VMT Impact Analysis

The Proposed Project's residential uses are anticipated to generate a VMT/Capita of 22.8 miles, which is 5.1 miles (22.4%) over the City Santee's significance threshold (17.7 miles) and the City of San Diego's threshold (16.1). Therefore, the residential uses within the Proposed Project would have a significant transportation VMT impact under both jurisdictional thresholds.

The Proposed Project's commercial uses are anticipated to generate a VMT/Employee of 19.3 miles, which is 3.2 miles (16.6%) over both the City' Santee's and the City of San Diego's threshold (16.1). Therefore, the commercial uses within the Proposed Project would have a significant transportation VMT impact under both jurisdictional thresholds.

ES.3 Mitigation Measures

The following TDM measures included in the Mobility Management VMT Reduction Calculator Tool were identified to be feasible for the Proposed Project to implement:

1A. Voluntary Employer Commute Program (0.7% for Employees)
1C. Employer Carpool Program (Accounted for by 1A)
1D. Employer Transit Pass Subsidy (0.0%)

1E. Employer Vanpool Program (Accounted for by 1A)
2B. Mixed Use Development (Reductions accounted for by the SANDAG Model)
3A. Parking Pricing (7.5% for hotel guests)
3B. Parking Cash Out (2.4% for employees)
4E. Bikeshare (0.0%)
4G. Community-Based Travel Planning (2.0%)

ES.4 Proposed Project Impacts

The total VMT reduction associated with the measures listed above would be 3.2% for employment related VMT and 2.0% for residential related VMT. As identified in Table 3.2, the Proposed Project would have to reduce its VMT/Capita by 22.4% for the City of Santee or 29.4% for the City of San Diego, as well as its VMT/Employee by 16.6% to reduce the project related impacts to less than significant. Table ES.1 summarizes the Proposed Project's anticipated VMT with the implementation of the TDM plan.

Table ES.1 Proposed Project VMT with TDM Plan

Impact Type	Proposed Project VMT	Reduction with TDM Plan	Proposed Project VMT with TDM	VMT Threshold	Impact Mitigated?
VMT / Capita (Santee)	22.8	2.0%	22.3	17.7	No
VMT / Capita (San Deigo)	22.8	2.0%	22.3	16.1	No
VMT / Employee (Both)	19.3	3.2%	18.7	16.1	No

Note:
Proposed Project VMT with TDM Calculations:
VMT / Capita: 22.8 miles X (100%-2%) = 22.3 miles
VMT / Employee: 19.3 miles X (100%-3.2%) = 18.7 miles

As shown, the implementation of these TDM measures would not reduce the project related impact to less than significance. Therefore, the Proposed Project would still have significant and unavoidable transportation VMT impact for CEQA purposes since no feasible mitigation measures could be identified.

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1.0 Introduction

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The proposed project site that will be developed is located on approximately 169 acres and would include the redesign of the existing Carlton Oaks Golf Course and the following components: (1)) redesign of the golf course, (2) reconstruction of the clubhouse and pro shop, practice area, and learning center structure; (3) a hotel and associated cottages; (4) residential accessory uses consisting of two residential neighborhoods with open space areas; and (5) related on-site infrastructure. Approximately 3.4 acres consist of areas outside of the project site that will be developed with improvements associated with the Project and are located either in the City of San Diego or Santee (Off-site improvement areas). The off-site improvement areas and the proposed project site (developed and undeveloped) make up the CEQA Study area

Since the Proposed Project's study area includes transportation facilities located in the City of Santee and the City of San Diego, the standards from each jurisdiction were applied to their respective transportation facilities. Transportation facilities located within the City of Santee were evaluated utilizing City of Santee standards. Similarly, transportation facilities located within the City of San Diego were evaluated utilizing City of San Diego standards.

The Proposed Project is proposing to redevelop the existing Country Club and 52-room hotel, into a recreational-oriented mixed-use resort community. The Proposed Project will include an improved golf course, clubhouse, hotel, pro shop, practice area, tournament hall, cart barn, learning center, and residential accessory uses. The following is a summary of the proposed project uses:

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The residential and commercial land uses will be located in the City of Santee; and the Carlton Oaks Golf Course will be partially located in the City of San Diego and the City of Santee. Figure 1.1 displays the Proposed Project's regional location.

Access to the Proposed Project will be provided via two driveways:

- Project Driveway #1 – will be constructed along east side of West Hills Parkway, south of Carlton Oaks Drive, and will create the eastern leg of a new side-street stop-controlled intersection with full access. Improvements will be implemented by the project to construct a turn pocket for the southbound left-turn movement to allow vehicles to safely enter the project driveway. One lane will be constructed for traffic entering the driveway and another for traffic exiting the driveway.
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The San Diego River Trail is a regional Class I multi-use path that runs along the San Diego River and connects the Lakeside Baseball Fields to the western terminus of the City of Santee. Currently there is a gap in the trail between the intersection of Mast Boulevard/SR-52 eastbound ramps and the eastern proposed project boundary. The San Diego Association of Governments (SANDAG) has developed a plan to complete this portion of the San Diego River Trail by constructing it along the southern edge of the project site. A Mitigated Negative Declaration was adopted on June 16, 2017 (SANDAG 2017), and the bicycleway is currently in the engineering design phase; a construction schedule has yet to be set. The SANDAG segment would be funded through Transnet, the regional half-cent sales tax for transportation administered by SANDAG, although construction funds have not yet been identified. The segment of the San Diego River Trail that runs along the project boundary is not part of the proposed project, but the project applicant would continue to work with the City of Santee, City of San Diego, and SANDAG to ensure that the proposed project's design would not impede implementation of the trail.

As part of the proposed project, a multipurpose public trail would be provided on the northern side of the San Diego River, linking with existing and planned trails east and west of the site (termed the Project Trail Segment herein). A portion of the Project Trail Segment on the eastern side of the project site would begin at the entrance of Residential North at Carlton Oaks Drive, traverse through the resort and along

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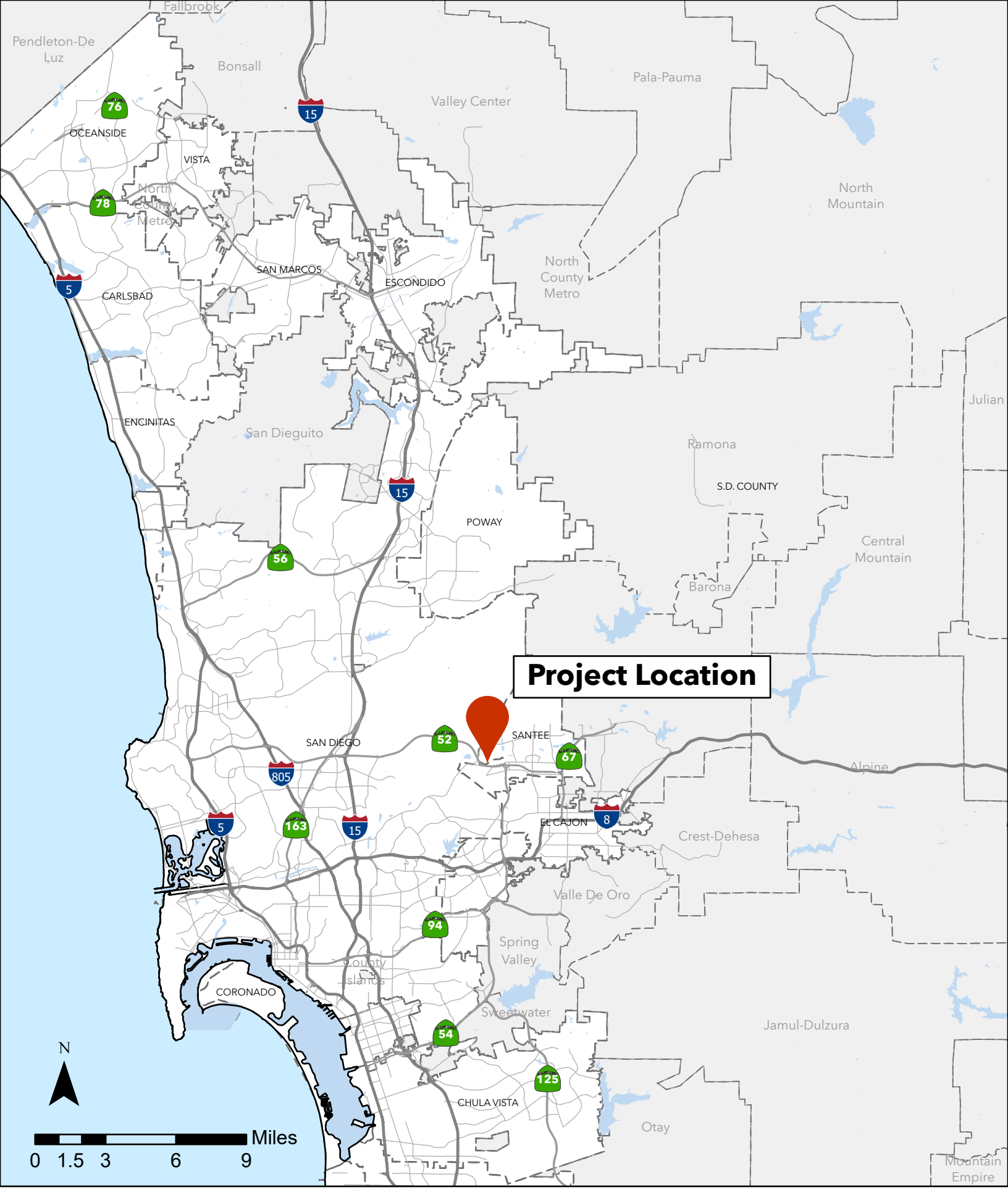
Figure 1.2 displays the Proposed Project site plan.

Figure 1.3 displays the CEQA study area which includes the Project footprint as well as the locations where off-site improvements will occur. The proposed off-site improvement areas will not affect the VMT impact analysis contained within this report.



Carlton Oaks Country Club and Resort
Transportation Impact Study

Figure 1.1
Project Location

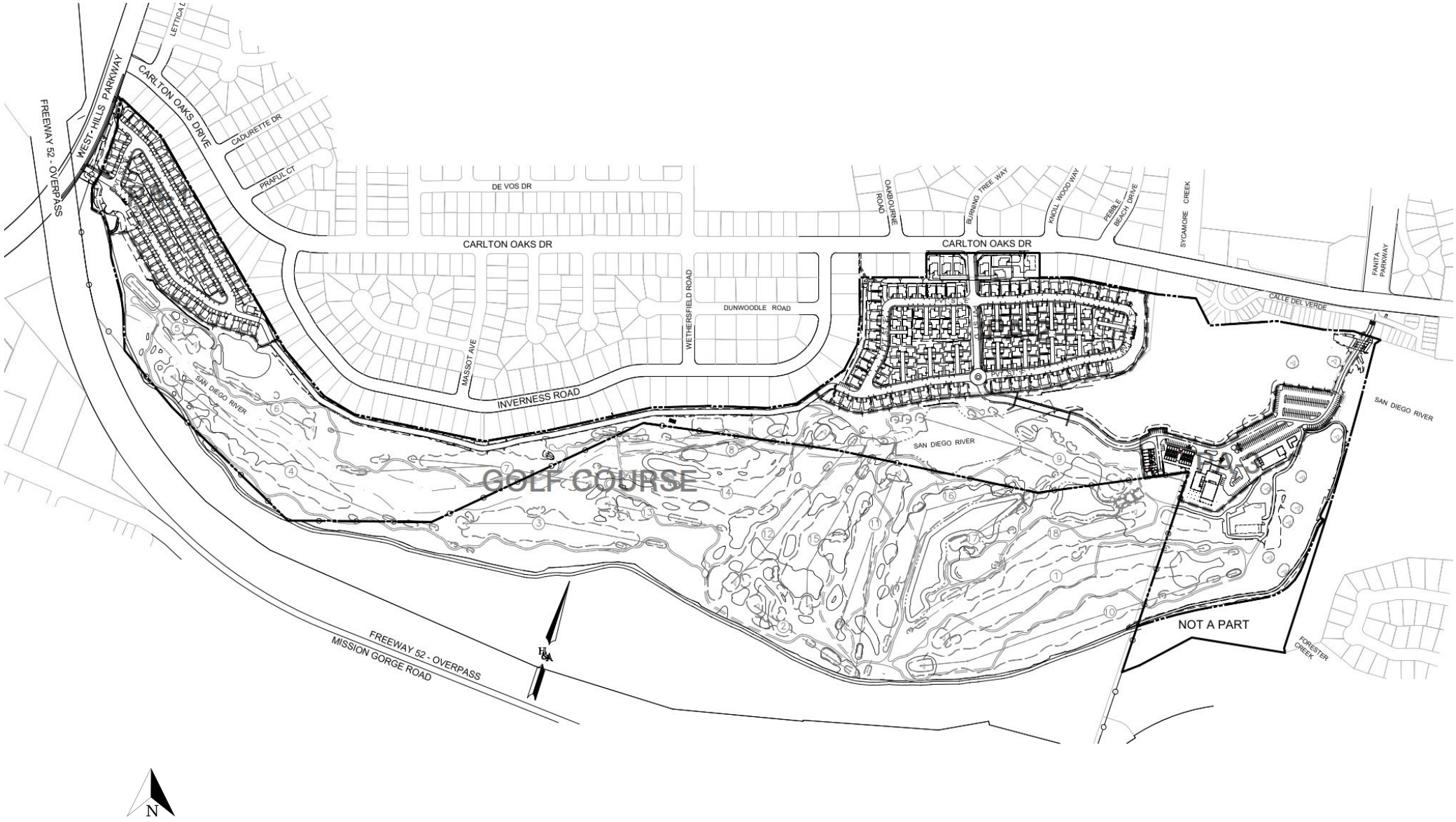


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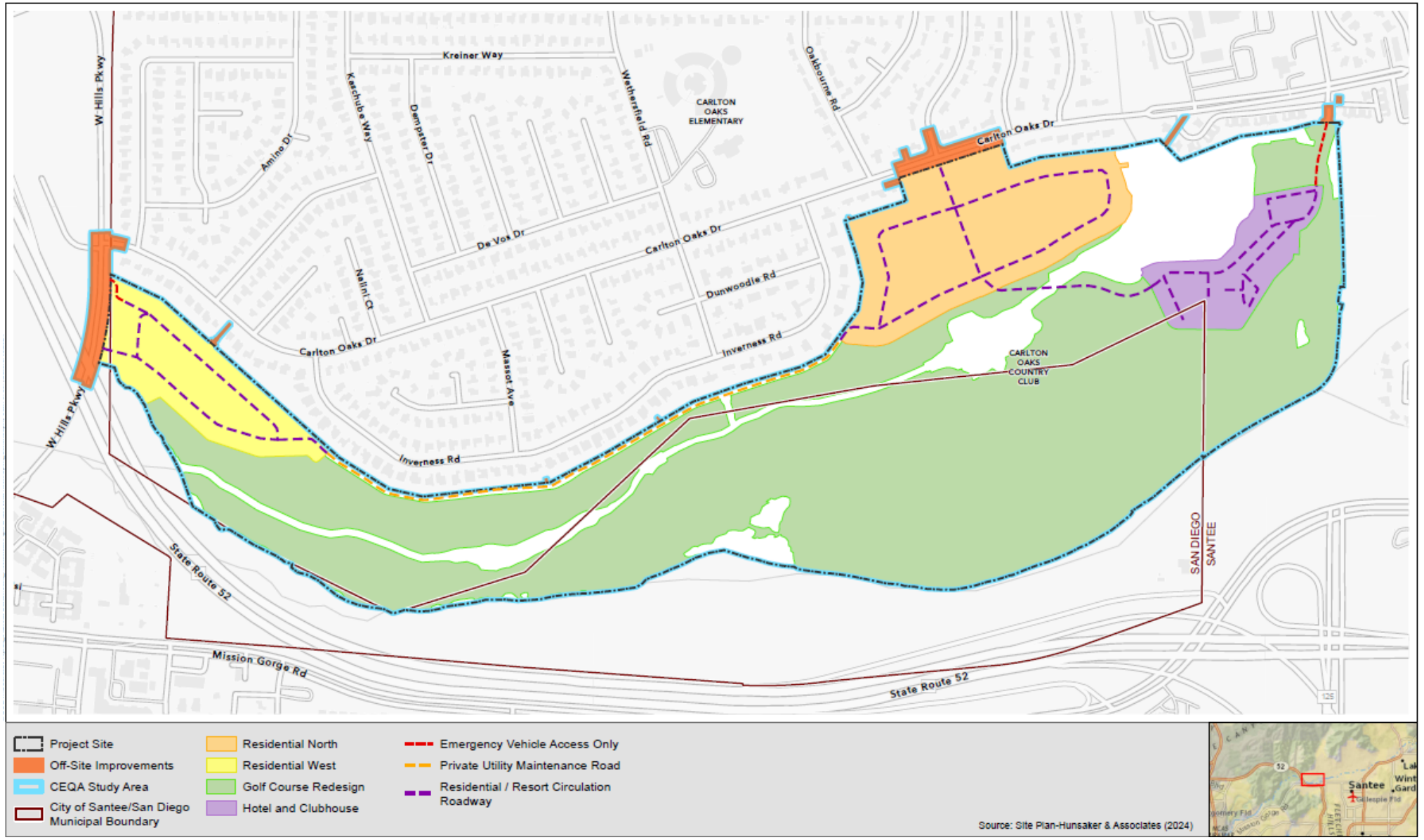
Figure 1.2
Project Site Plan



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Carlton Oaks Country Club and Resort
Transportation Impact Study

Figure 1.3

Proposed Project CEQA Boundary

1.2 Project Approvals

As part of its entitlement and permitting process, the Proposed Project requires the following approvals from each respective jurisdiction:

City of Santee

- Certification of the EIR
- Approval of the Tentative Map
- Approval of the Development Review Permit
- Approval of the 2 Conditional Use Permits for the golf course, country club and related uses
- Ministerial permits (building permit, grading permit, final map, etc.)

City of San Diego

- Site Development Permit – Process 3
- Ministerial permits (grading, etc.)

1.3 Project Setting

Access to the Proposed Project from the regional transportation network will be provided via West Hills Parkway, Mast Boulevard, Carlton Oaks Drive, Carlton Hills Boulevard, and the San Diego River Trail. These facilities will either provide a direct connection to Proposed Project, via project driveways (West Hills Parkway and Carlton Oaks Drive) or will provide a critical link between the Proposed Project and the regional transportation network (Mast Boulevard and Carlton Hills Drive). Descriptions of these transportation network facilities are provided below:

North-South Roadways

Carlton Hills Boulevard –Carlton Hills Boulevard provides a connection between the Proposed Project and SR-125, SR-52, and the commercial centers along Mission Gorge Road. Carlton Hills Boulevard between Mast Boulevard and Mission Gorge Road is a 4-lane roadway with a raised median and a posted speed limit of 35 mph. Sidewalks, on-street parking, and Class II bike lanes are provided on both sides of Carlton Hills Boulevard. Bus route 834 runs clockwise along Carlton Hills Boulevard (SB direction), providing transit services between the western neighborhoods of Santee and the Santee Transit Center. Bus Route 834 has an existing headway of 60 minutes throughout the day. The City of Santee *General Plan Mobility Element* Classifies Carlton Hills Boulevard as a Four-Lane Major Arterial.

West Hills Parkway – West Hills Parkway runs along the western edge of the Proposed Project and will provide direct access to the Proposed Project via a single driveway. West Hills Parkway is a 4-lane roadway with a striped or raised median (depending on the location) and a posted speed limit of 45 mph. Sidewalks are provided along the eastern side of West Hills Parkway and intermittently provided along the western side of the roadway. Parking is prohibited on both sides of the roadway. Bus route 834 runs clockwise on West Hills Parkway (NB direction), providing transit services between the western neighborhoods of Santee and the Santee Transit Center. Bus Route 834 has an existing headway of 60 minutes throughout the day. The closest bus stop to the Proposed Project site is located at the northeastern corner of Carlton Oaks Drive & West Hills Parkway. This segment of West Hills Parkway is located within the City of San Diego; however, the East Elliott Community Plan does not identify an ultimate classification for the roadway. It should be noted that the City of Santee *General Plan Mobility Element* classifies West Hills Boulevard as a Four-Lane Major Arterial.

East-West Roadways

Mast Boulevard – Mast Boulevard between the SR-52 EB Ramps and West Hills Parkway is located within the City of San Diego and provides a regional connection between the Proposed Project and SR-52. This segment of Mast Boulevard is a 4-lane roadway with a raised or striped median (depending on location) and a posted speed limit of 40 mph. Parking is currently prohibited along this segment Mast Boulevard. Sidewalks are available on both sides of this segment, with the exception of the southern side of the

roadway between SR-52 EB Ramps and SR-52 WB Ramps. Class II Bike Lanes are provided in both directions. Bus route 834 runs clockwise along Mast Boulevard (EB direction), providing transit services between the western neighborhoods of Santee and the Santee Transit Center. Bus Route 834 has an existing headway of 60 minutes throughout the day. The City of Santee *General Plan Mobility Element* Classifies Mast Boulevard as a Four-Lane Major Arterial, east of the SR-52 Ramps. The East Elliott Community Plan does not identify a classification for the portions of Mast Boulevard that are located within the City of San Diego.

Carlton Oaks Drive – Carlton Oaks Drive will provide direct access for the Proposed Project via a single driveway location at the Burning Tree Way intersection. Along the Proposed Project frontage, between West Hills Parkway and Fanita Parkway, Carlton Oaks Drive is constructed as a 2-lane roadway with a continuous left-turn lane and a 35-mph posted speed limit. Sidewalks and Class II bike lanes are available on both sides of Carlton Oaks Drive. No transit routes or services are currently available along Carlton Oaks Drive. The City of Santee *General Plan Mobility Element* Classifies Carlton Oaks Drive as a Two-Lane Collector with Two-Way Left-Turn Lane.

Regional Trail

San Diego River Trail – The San Diego River trail is a regional Class I Multi-Use path that runs along the San Diego River and connects between the Lakeside Baseball Fields and the western terminus within the City of Santee.[1] There is currently a gap in the trail between the intersection of Mast Boulevard / SR-52 EB Ramps and the eastern Proposed Project boundary. San Diego Association of Governments (SANDAG) has developed a plan to complete this portion of the San Diego River Trail by constructing it along the southern edge of the Proposed Project site. A Mitigated Negative Declaration (MND) was adopted by their Transportation Committee on June 16, 2017 (SANDAG 2017), and the bikeway is currently in the engineering design phase, with a construction schedule still to be set. The SANDAG Segment is planned to be funded through Transnet, the regional half- cent sales tax for transportation administered by SANDAG, although construction funds have not yet been identified. While the Carlton Oaks Golf Course segment of the San Diego River Trail is not part of the proposed project, the project applicant will continue to work with the City of Santee, City of San Diego, and SANDAG to ensure that the Proposed Project's design will not impede the implementation of the trail.

A map of the existing transportation network, including vehicular, pedestrian, bicycle, and transit facilities is provided in Figure 1.4.

Other Planned Multi-Modal Facilities (Santee General Plan)

The San Diego River Trail is a regional Class I multi-use path that runs along the San Diego River and connects the Lakeside Baseball Fields to the western terminus of the City of Santee. Currently there is a gap in the trail between the intersection of Mast Boulevard/SR-52 eastbound ramps and the eastern proposed project boundary. The San Diego Association of Governments (SANDAG) has developed a plan to complete this portion of the San Diego River Trail by constructing it along the southern edge of the project site. A Mitigated Negative Declaration was adopted on June 16, 2017 (SANDAG 2017), and the bicycleway is currently in the engineering design phase; a construction schedule has yet to be set. The SANDAG segment would be funded through Transnet, the regional half-cent sales tax for transportation administered by SANDAG, although construction funds have not yet been identified. The segment of the San Diego River Trail that runs along the project boundary is not part of the proposed project, but the project applicant would continue to work with the City of Santee, City of San Diego, and SANDAG to ensure that the proposed project's design would not impede implementation of the trail.

[1] Note: The San Diego River Trail is not contiguous between the Lakeside Baseball Field and the western terminus. Multiple sections of the comprehensive trail still need to be designed, funded, and constructed.

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A portion of the Project Trail Segment on the western side of the project site would be constructed beginning at the City of Santee's jurisdictional line and ending at the property line. This portion of the trail would be 10 feet wide and consist of decomposed granite. Safety fencing would be constructed along the Project Trail Segment adjacent to the golf course. This portion of the trail would link to the future planned trail known as the Carlton Oaks Golf Course Segment. In addition, the project applicant would provide an Irrevocable Offer of Dedication for portions of the Carlton Oaks Golf Course Segment that are within the project site but are not being constructed by the project applicant; these sections would be provided on the project's subdivision map.

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Figure 1.5 displays the proposed trail alignment.

1.4 Report Organization

Following this Introduction chapter, this report is organized into the following sections:

2.0 *Analysis Methodology* – This chapter describes the methodologies and standards utilized to analyze and identify the transportation related impacts associated with the Proposed Project.

3.0 *Transportation VMT Impacts and Mitigation* – This chapter derives and analyzes the projected Vehicle Miles Traveled (VMT) that will be generated by the Proposed Project. This chapter also identifies if the Proposed Project VMT would create significant project related impact, as it relates to the standards outlined in the California Environmental Quality Act (CEQA). Finally, the chapter provides recommendations for mitigation measures to reduce the identified transportation VMT impacts and evaluates the feasibility of the proposed mitigation measures.

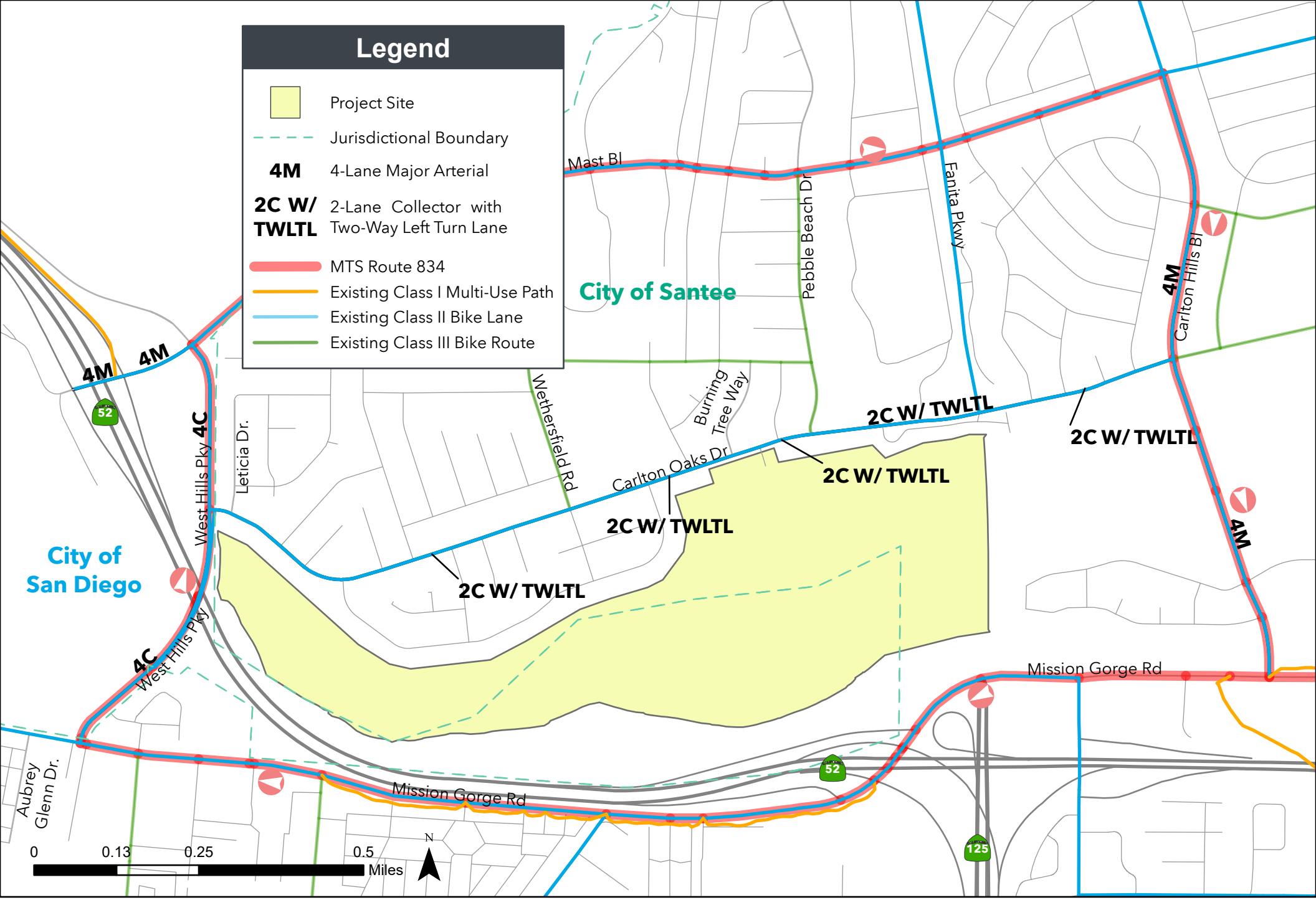
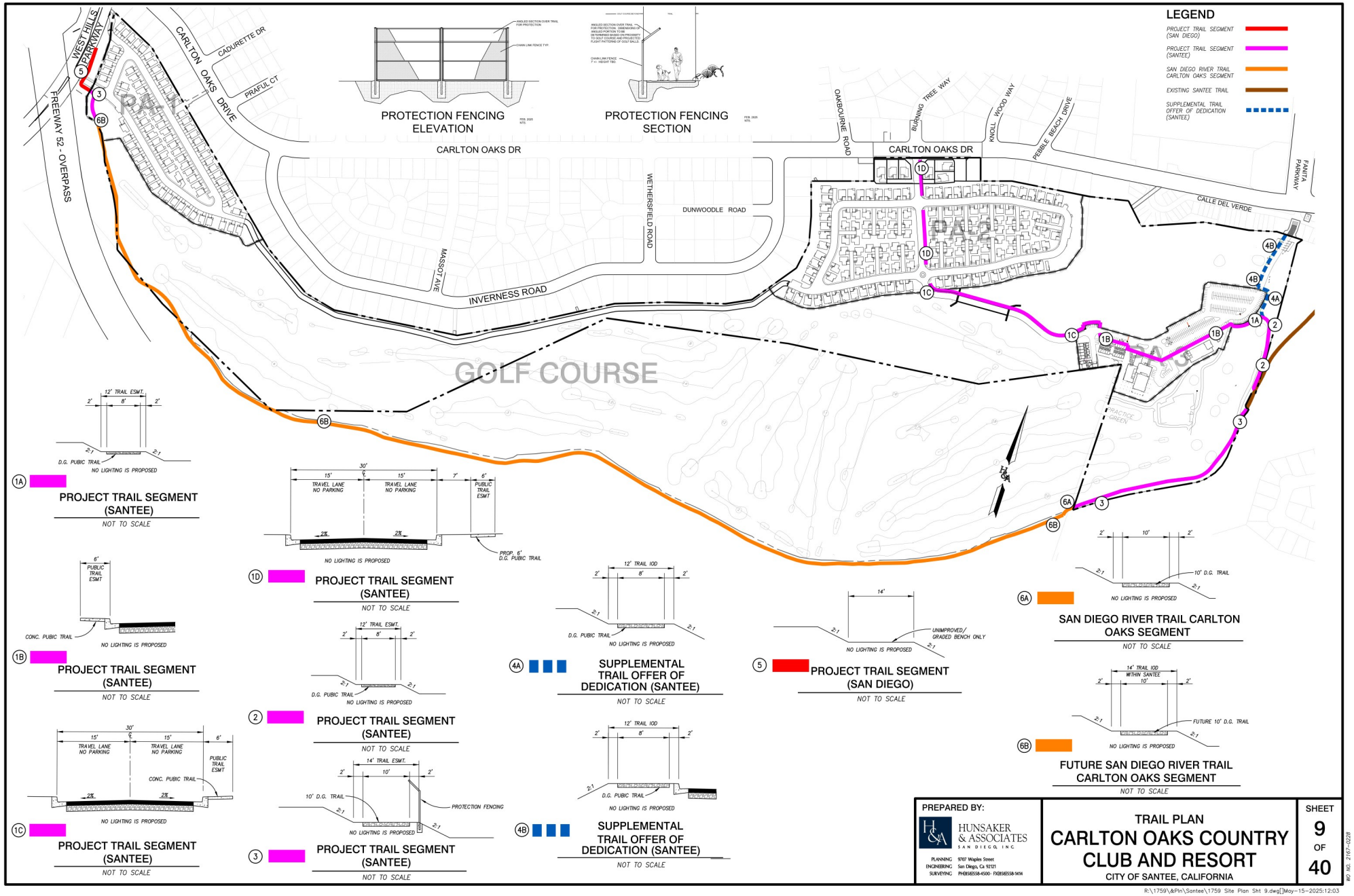


Figure 1.3

Surrounding Roadway Network
Existing Conditions



Carlton Oaks Country Club and Resort
Transportation Impact Analysis

Figure 1.5
On-Site Trail Alignment

2.0 Analysis Methodology and Threshold

This TIS was conducted in accordance with the standards and requirements adopted by the City of Santee, the City of San Diego, and in accordance with CEQA Statutes and Guidelines. The Proposed Project's residential uses will be located within the City of Santee's portion of the site consistent with the City's General Plan land use designation and zone. The southern portion of the Carlton Oaks Golf Course is located within the City of San Diego, and while the golf course will be updated and reconfigured with the Proposed Project, its ultimate use, number of holes, trip generation, and associated Vehicle Miles Traveled (VMT) are not anticipated to change. Although there are no changes from the land use designations allowed under the respective Cities' General Plan, the proposed land uses are anticipated to generate more than 2,400 ADT. Therefore, as recommended by the Regional TIS Guidelines, a VMT/Capita and VMT/Employee analysis using the SANDAG Series 14 Year 2016 ABM 2+ Model (Scenario ID 458) was prepared, and the City of Santee guidelines were utilized for this analysis

2.1 Background (SB-743)

On September 27, 2013, Governor Edmund G. Brown, Jr. signed SB-743 into law, starting a process that is expected to fundamentally change the way transportation impact analysis is conducted under CEQA. Within the State's CEQA Guidelines, these changes will include elimination of auto delay, level of service (LOS), and similar measurements of vehicular roadway capacity and traffic congestion as the basis for determining significant impacts.

On December 2018, the Resources Agency certified and adopted the CEQA Guidelines update package, which included the California Natural Resources Agency Guidelines for the Implementation of the California Environmental Quality Act. As a result, the California Governor's Office of Planning and Research (OPR) updated and released the Technical Advisory on Evaluating Transportation Impacts in CEQA (Technical Advisory) in December 2018. The Technical Advisory provides guidance and recommendations on how jurisdictions can update their transportation guidelines to be consistent with SB-743 and the updated CEQA guidelines. The Technical Advisory also provides substantial evidence for recommended VMT based significance thresholds, which jurisdictions can adopt, or project applicants can use in cases where jurisdictional specific standards are not provided.

2.2 Analysis Guidelines and Significance Thresholds (Santee)

The following section describes the analysis methods outlined in *the City of Santee VMT Analysis Guidelines* in which transportation related impacts are analyzed and identified. *The City of Santee VMT Analysis Guidelines, adopted April 27, 2022* were utilized to determine the significance thresholds for potential VMT related impacts caused by the Proposed Project. The intention of the guidelines is to address the new transportation analysis metrics and requirements, significance thresholds, and standards enacted by SB-743 and Section 15064.3 of the CEQA Guidelines. Note that this section only provides a brief summary of information provided in the *City of Santee VMT Analysis Guidelines*.

Screening Criteria (Santee)

Section 2.3.1 of the City of Santee VMT Analysis Guidelines provides the following thresholds to determine whether a project should conduct a VMT analysis:

1. *Projects Located in a Transit Accessible Area* – Project located within one-half mile of an existing major transit stop or along a high-quality transit corridor (as defined by Section 21064.3 of the California Public Resources Code).
2. *Small Projects* - Projects that generate less than 500 daily trips.
3. *Projects in a VMT-Efficient Area* – Projects located in areas with an average VMT/capita or VMT/employee below the City's thresholds (See Table 2.1).

4. *Locally-Serving Retail Projects* – Retail projects with less than 50,000 square feet and are expected to draw approximately 75% of customers from the local area (roughly 3-miles).
5. *Locally-Serving Public Facilities*- Public facilities that serve the surrounding community or public facilities that are passive use.
6. *Redevelopment Projects with Lower Total VMT* – Redevelopment projects where the proposed project's total project VMT is less than the existing land use's total VMT.
7. *Infill Affordable Housing* -Housing located in an infill area, with 52% affordable housing, is located within a half-mile of ta transit stop or station and does not provide parking that exceeds the minimum requirements of the City's Municipal code.

The Proposed Project does not meet any of the criteria listed above. Therefore, a full VMT impact analysis was conducted.

Analysis Metrics (Santee)

For land use development projects, the *City of Santee VMT Analysis Guidelines* require that the following two metrics be analyzed to determine if a project has a significant transportation related impact:

- *VMT/Capita*: Includes all vehicle-based person trips grouped and summed to the home location of individuals who are drivers or passengers on each trip. It includes both home-based and non-homebased trips. The VMT for each home is then summed for all homes in a particular census tract and divided by the population of that census tract to arrive at Resident VMT/Capita.
- *VMT/Employee*: Includes all vehicle-based person trips grouped and summed to the work location of individuals on the trip. This includes all trips, not just work-related trips. The VMT for each work location is then summed for all work locations in a particular census tract and then divided by the total number of employees of that census tract to arrive at the VMT/Employee.

Note: As per Table E1 of the *City of Santee VMT Analysis Guidelines*, a hotel is considered to have a trip-making characteristic closer to an employment project, and therefore the employment methodology should be used for this land use category.

Determination of Significance – CEQA (Santee)

Table 2.1 summarizes the significance thresholds outlined in the Section 2.3.2 of the City of Santee VMT Analysis Guidelines.

Table 2.1 City of Santee Significance Thresholds

Land Use	Metric	Threshold
Residential	VMT/capita	15% below the City average VMT/capita
General Employment	VMT/employee	15% below the regional average VMT/employee
Industrial Employment	VMT/employee	At or below regional average VMT/employee
Mixed Use	VMT/capita & VMT/employee	Each project component is evaluated per the appropriate metric based on land use type (e.g., residential, employment, and retail)
Regional Retail, Recreation, or Public Facilities	Total VMT	A net increase in total regional VMT using the boundary method

Source: City of Santee VMT Analysis Guidelines

2.3 Analysis Guidelines and Significance Thresholds (San Diego)

The following section describes the analysis methods outlined in *the City of San Diego Transportation Manual* in which transportation related impacts are analyzed and identified. The *City of San Diego Transportation Manual adopted September 19, 2022* were utilized to determine the significance thresholds for potential VMT related impacts caused by the Proposed Project. The intention of the guidelines is to address the new transportation analysis metrics and requirements, significance thresholds, and standards enacted by SB-743 and Section 15064.3 of the CEQA Guidelines. Note that this section only provides a brief summary of information provided in the *City of San Diego Transportation Manual*.

Screening Criteria (San Diego)

The *City of San Diego Transportation Study Manual* provides the following thresholds to determine whether a project should conduct a VMT analysis:

1. *Residential or Commercial Project Located in a VMT Efficient Area:* The project is a residential or commercial employment project located in a VMT efficient area (15% or more below the base year average VMT per Capita or VMT per Employee) based on the applicable location-based screening map produced by SANDAG.

2. *Industrial or Agricultural Project Located in a VMT Efficient Area:* The project is an industrial employment or agricultural employment project located in VMT efficient area (in an area with average or below average base year VMT per Employee) based on the applicable location-based screening map produced by SANDAG.

3. *Small Project:* The project is a small project defined as generating less than 300 daily unadjusted driveway trips using the City of San Diego trip generation rates/procedures.

4. *Locally Serving Retail/Recreational Project:* The project is a locally serving retail/recreational project defined as having 100,000 square feet gross floor area or less and demonstrates through a market area study that the market capture area for the project is approximately three miles (or less) and serves a population of roughly 25,000 people or less. Locally serving retail is consistent with the definitions of Neighborhood Shopping Center in the San Diego Municipal Code Land Development Code Trip Generation Manual. Locally serving recreation land uses are listed in Appendix B, if they meet the square footage and market capture area above. Adding retail/recreation square footage (even if it is 100,000 square feet gross floor area or less) to an existing regional retail shopping area is not screened out.

5. *Locally Serving Public Facility:* The project is a locally serving public facility defined as a public facility that serves the surrounding community or a public facility that is a passive use. The following are considered locally serving public facilities: transit centers, public schools, libraries, post offices, park-and-ride lots, police and fire facilities, and government offices. Passive public uses include communication and utility buildings, water sanitation, and waste management.

6. *Affordable Housing:* The project has access to transit4 and is wholly or has a portion that meets one of the following criteria: is affordable to persons with a household income equal to or less than 50% of the area median income (as defined by California Health and Safety Code Section 50093), housing for senior citizens [as defined in Section 143.0720(e)], housing for transitional foster youth, disabled veterans, or homeless persons [as defined in 143.0720(f)]. The units shall remain deed restricted for a period of at least 55 years. The project shall provide no more than the minimum amount of parking per unit, per San Diego Municipal Code Section 143.0744. Only the portion of the project that meets the above criteria is screened out. For example, if the project is 100 units with

10 deed-restricted affordable housing units, transportation VMT analysis would not be necessary for the 10 affordable units but would be necessary for the remaining 90 units (unless they meet one of the other screening criteria). For purposes of applying the small project screening criteria, the applicant would only include the trip generation for the non-affordable housing portion of the project (since the affordable housing portion is screened out).

7. *Mixed Use Project Screening Considerations:* The project's individual land uses should be compared to the screening criteria above. It is possible for some of the mixed-use project's land uses to be screened out and some to require further analysis. For purposes of applying the small project screening criteria, the applicant would only include the trip generation for portions of the project that are not screened out based on other screening criteria. For example, if a project includes residential and retail, and the retail component was screened out because it is locally serving; only the trip generation of the residential portion would be used to determine if the project meets the definition of a small project.

8. *Redevelopment Project Screening Considerations:* The project is a redevelopment project that demonstrates that the proposed project's total project VMT is less than the existing land use's total VMT. Exception: If a project replaces affordable housing (either deed restricted or other types of affordable housing) with a smaller number of moderate-income or high-income residential units, the project is not screened out and must analyze VMT impacts.

The Proposed Project does not meet any of the criteria listed above. Therefore, a full VMT impact analysis was conducted.

Determination of Significance – CEQA (San Diego)

Table 2.2 summarizes the significance thresholds outlined in the Table 3 of the *City of San Diego Transportation Study Manual*.

Table 2.2 City of San Diego Significance Thresholds

Land Use	Threshold[1]
Residential	15% below regional mean[2] VMT per capita
Commercial Employment	15% below regional mean[2] VMT per employee
Industrial and Agricultural Employment	Regional mean[2] VMT per employee
Regional Retail	Zero net increase in total regional VMT[2]
Hotel	See Commercial Employment
Regional Recreational	See Regional Retail
Regional Public Facilities	See Regional Retail
Mixed-Use	Analyze each land use individually per above categories
Redevelopment	Apply the relevant threshold based on proposed land use (ignore the existing land use)
Transportation Projects	Zero net increase in total regional VMT[2]

Source: Table 3, City of San Diego Transportation Study Manual

Notes:
[1]Projects that exceed these thresholds would have a significant impact.

[2]The regional mean and total regional VMT are determined using the SANDAG Regional Travel Demand Model. The specific model version and model year will be identified by the Development Services Department's Transportation Development Section.

2.4 Analysis Tools

As noted in Section 2.2 of the *City of Santee VMT Analysis Guidelines*:

> In general, transportation VMT analysis for CEQA should be conducted using the SANDAG Regional Travel Demand Model. The model outputs can be used to produce VMT/capita, VMT/employee, and Total VMT. There may be circumstances under which other tools and techniques should be used to perform VMT analysis. There are unique land uses that are not appropriately modeled using the SANDAG model, such as uses that have the majority of their activity on the weekends (the SANDAG Model produces weekday results) or projects that generate less than 2,400 average daily trips (ADT).

Additionally, as noted in Section 2.3.3 of the *City of Santee VMT Analysis Guidelines*, for larger projects:

> Larger projects will typically be analyzed using a custom model run by inputting the project into the SANDAG Regional Travel Demand Model. To perform the analysis, all project land uses should be inputted, and the VMT/capita should be determined using the same method/scripts that SANDAG utilizes to calculate the VMT/capita threshold. Note that there may be some circumstances where the use of screening maps or other sketch modeling tools are appropriate for larger projects, especially if the project has the same characteristics of the land uses that are already contained in the TAZ where the project is located or if the project is unique in nature and project specific travel behavior information is available.

Based on the timing of the Proposed Project analysis and discussions with the City of Santee, the SANDAG Series 14 Model (ABM 2+)[2], was used for the Proposed Project VMT analysis.

[2] A detailed description of how the SANDAG Model calculates VMT is provided at the following location: https://www.sandag.org/resources/maps_and_gis/interactive_maps/SB743_Documentation.pdf.

3.0 Transportation Impact & Mitigation

This chapter derives and analyzes the VMT that will be generated by the Proposed Project. This chapter also identifies if the Proposed Project related VMT would create significant project related impact, as it relates to the standards outlined in the California Environmental Quality Act (CEQA) and the *City of Santee VMT Analysis Guidelines*. Finally, the chapter provides recommendations for mitigation measures to reduce the Proposed Project's impacts to less than significant levels and evaluates the feasibility of the proposed mitigation measures.

3.1 Determination of Analysis Method

As displayed previously in Table 2.1, the method used to derive and evaluate project VMT is determined based on the Proposed Project's Trip Generation. Trip generation rates for the Proposed Project were developed utilizing *SANDAG's not so Brief Guide to Vehicular Trip Generation (SANDAG, April 2002)*. As noted in the project description, the Golf Course, and its associated ancillary uses (pro shop, cart barn, learning center, and practice areas), are existing uses. Therefore, these uses are not included in the Proposed Project trip generation, as they are not changing in nature and any trip generation associated with these uses should be accounted for under baseline conditions. Conversely, there is an existing 52 room hotel on the Proposed Project site; however, the existing hotel will be fully redeveloped to include a new clubhouse with amenities such as a spa, pool, and tournament hall. Since the hotel is being redeveloped and will include new amenities, it is not assumed to be included within the baseline and its full trip generation was assumed. Table 3.1 displays daily, as well as AM and PM peak hour project trip generation.

Table 3.1 Project Trip Generation

Land Use	Units	Trip Rate	ADT	AM					PM				
				%	Trips	Split	In	Out	%	Trips	Split	In	Out
Multi-Family (6-20 DU/Acre)[1]	236 DU	8/DU	1,888	8%	152	(2:8)	30	122	10%	189	(7:3)	132	57
Single Family Detached Housing[2]	6 DU	10/DU	60	8%	5	(3:7)	2	3	10%	6	(7:3)	4	2
Hotel (W/Convention Facilities/Restaurant)[3]	52 Room	10/Room	520	6%	32	(6:4)	19	13	8%	42	(6:4)	25	17
Restaurant (Quality)[4]	3,675 SF	100/KSF	368	1%	4	(6:4)	2	2	8%	30	(7:3)	21	9
Total			2,836		193		53	140		267		182	85

Source: SANDAG Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region (April 2002)

Notes:

[1]Includes the 86 multi-family dwelling units located in the western residential area and the 150 dwelling units located in the northern residential area. The density of the residential units is 9.0 units per acre on the westside and 8.4 per acre on the northside. Therefore, the residential trip generation rate for units with a density between 6-20 units per acre was utilized.

[2]It should be noted that the Proposed Project site plan shows seven single family units; however, one unit currently exists; therefore, it is not included in the Proposed Project trip generation.

[3]The proposed hotel use is anticipated to include a 4,800 SF tournament hall which can be used to host special events and other public functions. Other clubhouse features such as the proposed spa and pool are also assumed within the hotels trip generation. To account for the additional trips associated with the tournament hall, the SANDAG trip generation rate for a Hotel with convention facilities/restaurant was assumed.

[4]Typically restaurant uses associated with Hotel sites are accounted for within the hotels trip generation rate, However, due to the limited number of hotel rooms, the proposed restaurant was analyzed separately, even though this use is generally included within the Hotel (with conversion facilities/restaurant) land use.

As shown above, the proposed land uses are anticipated to generate a total of 2,836 average daily trips (ADT) with 193 trips (53-in/140-out) during the AM peak hour and 267 trips (182-in/85-out) during the PM peak hour.

Multi-Family Land Use Trip Generation

As shown in Table 3.1, the Proposed Project LMA is using the trip generation rates for the proposed project's land uses based on corresponding land uses listed in the *SANDAG (Not So) Brief Guide of Vehicular Traffic Generation Rates for the San Diego Region, dated April 2002*. The residential portion of the Proposed Project consist of multi-family detached residential units in which the underlying land will be held in common ownership. The average residential unit density within the Proposed Project will be between 8.4-and 9.0 units per acre consistent with the densities of the R-7 land use district.

The R-7 land use district allows for densities between 7-14 units per acre and offers a wide range of residential development types, including attached and detached single family units at the lower end of the density range and multiple family attached units at the higher end of the density range. Under the R-7 land use district, multi-family dwellings (townhomes and detached condominiums) are also a permitted use. (Table 13.10.030A) Multifamily residential development is defined as:

> "Development, multifamily residential" means a development where the number of dwelling units on one lot is more than one or where dwelling units are attached. Such development includes condominiums, townhomes, apartments and similar types of development."

Therefore, the TIS is using a trip generation rate for multi-family units with a density between 6 – 20 units per acre, at 8 daily trips per unit, from the *(Not So) Brief Guide of Vehicular Traffic Generation Rates*. This trip generation rate was determined to be the most appropriate to be used for the Proposed Project based on the type of use proposed (multi-family residential) and the density allowed under the R-7 land use district category. The Proposed Project's multi-family residential product will consist of detached dwelling units located very near to each other on shared lots with common areas. Unlike single family homes, the homeowner does not own the underlying land resulting in units being clustered together on one lot.

It should be noted that the six new single family homes included in Table 3.1 will be traditional single family homes with one unit per parcel and will have a single owner. Therefore, these units were analyzed at the 10 trip per unit rate.

3.2 VMT Impact Analysis

To calculate the average VMT/Capita and VMT/Employee generated by the Proposed Project, the Proposed Project land uses, outlined in Table 3.1, as well as the existing golf course uses, were incorporated into the SANDAG Series 14 Year 2016 Regional Model (ABM2+; Scenario ID 458).

3.3 SANDAG Model Analysis

The SANDAG Series 14 model is an Activity Based Model (ABM) that simulates individual and household transportation decisions that compose their daily travel itinerary. People travel outside their home for activities such as work, school, shopping, healthcare, and recreation, and the ABM attempts to predict whether, where, when, and how this travel occurs, this process is called a tour. ABMs are particularly good at conducting VMT/Capita and VMT/Employee assessments because they can incorporate and evaluate Transportation Demand Management (TDM) policies, social equity, carpooling, transit access, parking conditions, tolling, and pricing. Because an ABM tracks the characteristics of each person, the model can be used to analyze the travel patterns of a wide range of socioeconomic groups. For example, a household with many members may be more likely to carpool, own multiple vehicles, and share shopping responsibilities.

The SANDAG ABM includes a number of methodological strengths. It predicts the travel decisions of San Diego residents at a detailed level, taking into account the way people schedule their day, their behavioral patterns, and the need to cooperate with other household members. When simulating a person's travel patterns, the ABM takes into consideration a multitude of personal and household attributes like age, income, and gender. The model's fine temporal and spatial resolution ensures that it is able to capture subtle aspects of travel behavior. As noted on page 5 of the *OPR Technical Advisory*:

> Tour- and trip-based approaches offer the best methods for assessing VMT from residential/office projects and for comparing those assessments to VMT thresholds. These approaches also offer the most straightforward methods for assessing VMT reductions from mitigation measures for residential/office projects. When available, tour-based assessment is ideal because it captures travel behavior more comprehensively. But where tour-based tools or data are not available for all components of an analysis, a trip-based assessment of VMT serves as a reasonable proxy.

The SANDAG Series 14 Model incorporates a tour-based approach when calculating and evaluating VMT. Therefore, based on the guidance presented above, as well as the recommendation contained in the *Region TIS Guidelines*, the SANDAG Series 14 Model was chosen as the most appropriate tool to evaluate the Proposed Project's VMT generation.

3.4 VMT Analysis Results (City of Santee)

The results of SANDAG' ABM 2+ base year forecast are provided in Table 3.2. Model output results are presented in Appendix B.

Table 3.2 VMT Analysis Results Impact Analysis

Metric	City of Santee		City of San Diego	
	Residential Uses VMT/Capita (miles/person)	Commercial Uses VMT/Employee (miles/person)	Residential Uses VMT/Capita (miles/person)	Commercial Uses VMT/Employee (miles/person)
City/Regional Average	20.8[1]	18.9[2]	18.9[3]	18.9[2]
Significant Impact Threshold[4]	17.7	16.1	16.1	16.1
Proposed Project	22.8	19.3	22.8	19.3
Proposed Project vs Significant Impact Threshold	5.1 miles 22.4% over	3.2 miles 16.6% over	6.7 miles 29.4% over	3.2 miles 16.6% over
Significant Impact	Yes	Yes	**Yes**	**Yes**

Source: SANDAG ABM 2+ Regional Transportation Model, 2022

Notes:
[1]City of Santee VMT /Capita Average Source; SANDAG Series 14 Year 2016 Model (Scenario ID 458)
[2]San Diego Regional VMT /Employee Average, Source; SANDAG Series 14 Year 2016 ABM 2+ Model (Scenario ID 458). Note, the census tract the Proposed Project is located in (166.06) does not currently have a large enough sample of employees to calculate a VMT/Employee. Therefore, the Proposed Project's VMT/Employee was derived from the census tract located directly to the east (166.14).
[3]San Diego Regional VMT /Capita Average, Source; SANDAG Series 14 Year 2016 ABM 2+ Model (Scenario ID 458).
[4]City/Regional Average X 85% (See Section 2.4)
[5]Employee VMT data is not available for Proposed Project's census tract; therefore, used an adjacent tract east of the project that includes Town Square and has a higher VMT/employee, which provides a more conservative analysis.

As shown in Table 3.2, the Proposed Project's residential uses are anticipated to generate a VMT/Capita of 22.8 miles, which is 5.1 miles (22.4%) over the City Santee's significance threshold (17.7 miles) and the City of San Diego's threshold (16.1). Therefore, the residential uses within the Proposed Project would have a significant transportation VMT impact under both jurisdictional thresholds.

The Proposed Project's commercial uses are anticipated to generate a VMT/Employee of 19.3 miles, which is 3.2 miles (16.6%) over both the City' Santee's and the City of San Diego's threshold (16.1). Therefore, the commercial uses within the Proposed Project would have a significant transportation VMT impact under both jurisdictional thresholds.

3.5 Sustainable Communities Strategies

The Proposed Project's residential uses will be located within the City of Santee and is consistent with the City's General Plan land use designation and zone. This site is designated as Plan Development under Section 5.5, Areas for Special Study of the City of Santee's General Plan. In accordance with Section 13.19.030 of the Santee Municipal Code, residential uses are also allowed as a permitted use under the Planned Development (PD) District zoning designation. The southern portion of the Carlton Oaks Golf Course is located within the City of San Diego and will be updated and reconfigured with the Proposed Project. However, both the golf course and the County Club/ are existing uses within the Proposed Project site and will only be redeveloped and relocated.

As noted on page 12 of OPR's the Technical Advisory:

> In MPO areas, development measured against city VMT per capita (rather than regional VMT per capita) should not cumulatively exceed the population or number of units specified in the SCS for that city because greater-than-planned amounts of development in areas above the region-based threshold would undermine the VMT containment needed to achieve regional targets under SB 375.

As described above, the Proposed Project is not seeking a GPA and its land uses are consistent with the City's General Plan, the Proposed Project should not cumulatively exceed the population assumed in region's Sustainable Communities Strategies (SCS), developed by SANDAG and is included as an element in the 2050 Regional Transportation Plan. Therefore, based on the project's consistency with the City's General Plan, additional analysis regarding impacts to the SCS and the regional SB 375 targets is not required.

3.6 VMT Mitigation

As noted in Section 3.2, both the residential and commercial uses within the Proposed Project would have a significant transportation VMT impact. In order to reduce the VMT/Capita and VMT/Employee associated with the Proposed Project to a less than significant level, Transportation Demand Management (TDM) measures would need to be implemented to reduce project related VMT. Therefore, a TDM analysis was conducted using the *SANDAG Mobility Management VMT Reduction Calculator Tool* to provide an understanding of the types and magnitude of TDM related features the Proposed Project would need to implement to reduce these impacts to less than significant levels. This approach is consistent with Section 2.5 of the *City of Santee VMT Analysis Guidelines and the City of San Diego Transportation Study Manual*, which both recommends using the SANDAG Mobility Management VMT Reduction Calculator Tool, or the *Handbook for Analyzing Greenhouse Gas Emission Reductions, Assessing Climate Vulnerabilities, and Advancing Health and Equity* to identify and quantify mitigation measures.

The Mobility Management VMT Reduction Calculator Tool estimates the percent reduction in VMT resulting from the application of mobility management strategies. This Excel-based tool is intended to act as a resource for identifying and evaluating the impacts of mobility management strategies as part of the development review and transportation analysis process. The tool supports the goals of SB 743 (Steinberg, 2013) by providing jurisdictions and developers with a resource to quantify VMT reductions resulting from implementation of a variety of mitigation strategies at various scales. The tool also supports local government planning efforts including implementation of general and community plans, TDM ordinances, and climate action plans.

The TDM measures included in the Mobility Management VMT Reduction Calculator Tool were the only measures that were considered to be used as Proposed Project mitigation, as they are the measures recognized and called out by the City of Santee VMT Analysis Guidelines and the only measures that have been calibrated and quantified specifically to the San Diego Region. It should be noted that the Mobility Management VMT Reduction Calculator Tool does not include every potential TDM measure that could potentially reduce Proposed Project related VMT. Moreover, the effectiveness and methods to calculate VMT reductions for TDM measures not included within the tool have not been recognized or agreed upon by the region and may be subject to challenge. Therefore, these measures were not considered as mitigation strategies and reductions were not taken due to the lack of substantial evidence to support their effectiveness.

Table 3.3 reviews each of the TDM measures included in the Mobility Management VMT Reduction Calculator Tool, identifies if the TDM measure would be applicable to the Proposed Project, and quantifies the potential reduction in VMT that the Proposed Project would experience with the implementation of the measure. The purpose of this assessment is to calculate the potential reduction in Proposed Project VMT that is feasible through quantifiable and accepted TDM measures. If the Proposed Project is not able to reduce its VMT/Capita by 22.4% for the City of Santee or 29.4% for the City of San Diego, as well as its VMT/Employee by 16.6% (See Table 3.2) then its impacts will remain significant and will become unavoidable.

Table 3.3 Potential TDM and VMT Reduction Measures

TDM Measures	Description	Feasible for the Proposed Project to Implement?	Potential Reduction
1A. Voluntary Employer Commute Program	Employer offers a voluntary employer commute trip reduction program. The program may include a carpool or vanpool program, subsidized or discounted transit passes, bike amenities, commute trip reduction marketing, and preferential parking permit program. This strategy encompasses strategies 1C (Employer Carpool Program), 1D (Employer Transit Pass Subsidy), and 1E (Employer Vanpool Program) and cannot be analyzed in combination with these strategies. Unlike strategy 1B (Mandatory Employer Commute Program), this strategy does not require monitoring, reporting, or performance standards. If this strategy is selected, strategy 1B cannot be analyzed as part of the total VMT reduction.	Yes - The project applicant will prepare and implement a TDM plan for their employees to participate in, voluntarily. The TDM plan may include measures such as: • Enroll in SANDAGs iCommute Program o Provide ride match assistance to employees for carpooling (Strategy 1C) o Implement a vanpool program and subsidies (Strategy 1E) o Inform employees of the different resources available to reduce their commute trips. • Subsidize transit passes for employees who elect to take transit to work (Strategy 1D). • Provide on-site bike racks and showers for employees who elect to ride their bike to work.	0.70%
1B. Mandatory Employer Commute Program	Employer offers a mandatory employer commute trip reduction program. The program may include a carpool or vanpool program, subsidized or discounted transit passes, bike amenities, encouragement for telecommuting and alternative work schedules, commute trip reduction marketing, and preferential parking permit program. This strategy encompasses strategies 1C, 1D, and 1E and cannot be analyzed in combination with these strategies. Unlike strategy 1A (Voluntary Employer Commute Program), this strategy would be contractually required of the developer or property owner and is accompanied by a regular performance monitoring and reporting program. If this strategy is selected, strategy 1A cannot be analyzed as part of the total VMT reduction.	N/A – The Proposed Project is electing to implement a Voluntary Employer Commute Program (Strategy 1A). The measures outlined within this strategy are included in within Strategy 1A; however, it will be voluntary for employees to participate.	N/A
1C. Employer Carpool Program	Employers can encourage carpooling by providing ride matching assistance to employees; providing priority parking for carshare vehicles; and providing incentives for carpooling.	Yes - The Hotel and Restaurant will implement an employer carpool assistance program for their employees. Additionally, the homeowner's association (HOA) will also implement a similar program for residents.	Included as part of Strategy 1A

Table 3.3 Potential TDM and VMT Reduction Measures

TDM Measures	Description	Feasible for the Proposed Project to Implement?	Potential Reduction
1D. Employer Transit Pass Subsidy	Employers can encourage employees to take transit by subsidized or discounted daily or monthly public transit passes to employees.	Yes – The project applicant will provide transit pass subsidies for employees who elect to take transit to work. However, due to the limited transit service accessing the Proposed Project site (Route 834), no reduction is assumed for this strategy.	0.0%
1E. Employer Vanpool Program	Vanpooling is a flexible form of public transportation that provides groups of 5–15 people with a cost-effective and convenient rideshare option for commuting. An employer can encourage ridesharing by subsidizing vanpooling for employees that have a similar origin and destination and by providing priority parking for employees that vanpool. The SANDAG Vanpool Program provides a subsidy of up to $400 per month to offset the vehicle lease cost.	Yes - The project applicant will coordinate with SANDAG's iCommute program to implement a Vanpool program, if feasible for an identified group of employees.	Included as part of Strategy 1A
1F. Employer Telework Program	A telework program enables employees to work from home or a remote location on a periodic basis. Depending on the nature of the work, schedules can range from full-time, specific days of the week, or as needed. The VMT impacts of telework are similar to a flexible work schedule program, which enables employees to work long hours in exchange for one day off every week or two.	No – The majority, if not all, of the jobs that are anticipated to be within the Proposed Project would be service based; therefore, there will be limited opportunity for teleworking. However, positions that could potentially telework would be provided that opportunity.	N/A
2A. Transit Oriented Development	Transit Oriented Development (TOD) refers to projects built in compact, walkable areas that have easy access to public transit, ideally in a location with a mix of uses, including housing, retail, offices, and community facilities. TODs are generally described as places within a 10 minute walk of a high-frequency rail transit station (e.g., SPRINTER, COASTER, Trolley). They should, at a minimum, incorporate bike and pedestrian access to transit, thereby encouraging transit use and reducing vehicle travel.	N/A - The Proposed Project is not within 0.5 miles of a transit station.	N/A

Table 3.3 Potential TDM and VMT Reduction Measures

TDM Measures	Description	Feasible for the Proposed Project to Implement?	Potential Reduction
2B. Mixed Use Development	Mixed use projects incorporate a range of complementary land uses that provide a balanced development approach relative to the surrounding neighborhood and encourage transportation alternatives. This could include co-location residential development, office space, retail shops, and others. Land use mix is measured using an entropy index. An index of 0 indicates a single land use while an index of 1 indicates equal distribution of all land uses. For ease of use, the strategy is calculated using only two land use types - residential (number of residents) and commercial (number of jobs).	Yes – However, the mixed use reductions associated with this measure should be accounted for in the SANDAG Model. Therefore, any further reduction could potentially result in double counting of the effect of the mixed land uses. It should be noted that pathways will be provided where project residents can drive electric golf carts to the commercial areas within the Proposed Project.	0.0%
3A. Parking Pricing	Priced parking can be implemented on- or off-street and helps to effectively manage the parking supply. Priced parking works best in areas where on-street parking is managed (e.g., priced parking, residential permit programs, time limits, etc.) to reduce unintended consequences of parking in adjacent neighborhoods.	Yes – The Hotel component of the project will charge a parking fee, included in the resort fee. Hotel patrons will be provided a rebate if they do not use a personal or rented vehicle to access the hotel.	7.5%[1]
3B. Parking Cash Out	Employers can offer employees who are provided free parking the option to take the cash value of the space in lieu of the space itself. California state law (AB 2109, Katz) requires that certain employers who provide subsidized parking for their employees offer a cash allowance in lieu of a parking space. This strategy is only applicable where employers pay for or rent parking for their employees. Parking cash-out is most successful when paired with incentives or programs that encourage the use of transportation alternatives.	Yes - The resort employees will be incentivized not to drive to work as a single driver and will be provided a TDM reward payment (amount to be determined later) for driving with a carpool group (3 or more).	2.4%[2]
4A. Street Connectivity Improvement	A connected and complete street network improves accessibility, safety, and livability of the community. Traditional grid street patterns with short blocks offer a high degree of connectivity compared to street networks with curvilinear designs and cul-de-sacs. This strategy uses intersection density as a proxy for street connectivity improvements, which help to facilitate a greater number of short trips. Example projects that increase intersection density would be building a new street network in a subdivision or retrofitting an existing street network to improve connectivity (e.g. cul-de-sacs converted to grid streets).	No - The Proposed Project will construct new internal private roadways; however, these roadways are intended for project access and will not enhance the connectivity of the external public street network.	N/A

Table 3.3 Potential TDM and VMT Reduction Measures

TDM Measures	Description	Feasible for the Proposed Project to Implement?	Potential Reduction
4B. Pedestrian Facility Improvement	Enhancing pedestrian facilities (e.g., streetscape and pedestrian crossing improvements) within the jurisdiction or community helps to encourage walking and reduce the reliance on the single occupancy vehicle. This strategy applies to sidewalk enhancements that improve the existing streetscape and is not inclusive of greenfield developments with new roadways.	N/A – This measure would not apply since the public sidewalks near the Proposed Project are already constructed to City standards; therefore, the project cannot take advantage of this reduction.	N/A
4C. Bikeway Network Expansion	A bikeway network includes an interconnected system of bike lanes, bike paths, and cycle tracks (Class I, Class II, and Class IV facilities). Bike facilities may share the roadway with vehicles or provide a dedicated pathway that separates bikes from cars or pedestrians. Increasing the network of bike facilities help to encourage biking as a safe and convenient alternative to driving. If this strategy is selected, strategy 4D (Bike Facility Improvement) cannot be analyzed as part of the total VMT reduction.	N/A – The Proposed Project does not include the direct implementation of any new bicycle network facilities. Additionally, due to the current transportation mode splits in the areas around the Proposed Project, improvements to the adjacent bicycle network are not projected to have a substantial effect on the Proposed Project VMT, thus it would not be viable mitigation.	N/A
4D. Bike Facility Improvement	If a comprehensive bikeway network expansion (strategy 4C) is not feasible, the addition of a single bike lane (Class II), bike path (Class I), or protected bikeway (Class IV) to an existing bikeway network helps to improve biking conditions within an area. Class I facilities are bike paths that are physically separated from motor vehicle traffic. Class II facilities are striped bicycle lanes that provide exclusive use to bicycles on a roadway. Class IV facilities are protected on-street bikeways, also called cycle tracks. Consider local or state bike width standards when implementing facility improvements. If this strategy is selected, strategy 4C (Bikeway Network Expansion) cannot be analyzed as part of the total VMT reduction.	N/A - Bike Facility Improvements are already assumed under 4C	See 4C

Table 3.3 Potential TDM and VMT Reduction Measures

TDM Measures	Description	Feasible for the Proposed Project to Implement?	Potential Reduction
4E. Bikeshare	Bikeshare programs help to reduce traffic congestion and demand for parking by providing users with on-demand access to bikes for short-term rental. Bikeshare systems that feature electrified vehicles (scooters, e-bikes) help increase the range of the bike trip, making these services convenient and attractive to users. Providing discounted bikeshare memberships or dedicated bikeshare parking can encourage users and improve the user experience.	Yes - The Proposed Project will provide a bikeshare service to hotel guests. Guests will be able to check out communal bikes from the front desk or clubhouse of the Hotel. This will allow guests to ride to different parts of the City, such as the Town Center, or along the San Diego River Trail. However, this is not applicable toward this VMT reduction, as this measure is intended to be a city-wide measure to be effective.	0.0%
4F. Carshare	Carsharing offers people with convenient access to a vehicle for personal or commuting purposes. Carsharing helps to encourage transportation alternatives by reducing vehicle ownership. Roundtrip carshare providers require members to return the vehicle to a designated location. One-way carshare (i.e., free-floating) providers allow members to pick up the vehicle in one place and end their trip in another. Discounted carshare memberships and priority parking for carsharing vehicles help to encourage use of carsharing services.	No – No public car share programs are currently available within the City of Santee. However, should a car share company want to locate a carshare on the property, the Proposed Project could accommodate the service for its guests, residents, and employees.	N/A
4G. Community-Based Travel Planning	Community-based travel planning (CBTP) is a residential-based approach to outreach that provides households with customized information, incentives, and support to encourage the use of transportation alternatives. The approach involves a team of trained 'Travel Advisors' engaging residents at home or in their communities to offer information, incentives, and advice about how members of households can travel in alternative ways that meet their needs. Teams of trained Travel Advisors visit all households within a targeted geographic area, have tailored conversations about residents' travel needs, and educate residents about the various transportation options available to them. Due to the personalized outreach method, communities are typically targeted in phases.	Yes - It is assumed that the Proposed Project HOA will provide alternative modes of transportation information to residents and tenant as a part of the "New Resident" or "New Tenant" package. The HOA will also provide residents with transit schedules within the area, and alert residents when new transit services are added, or services are charged. The HOA will also act as Travel Advisor, providing new residents and tenants with information regarding how members of households can travel in alternative ways that meet their needs.	2.0%

Table 3.3 Potential TDM and VMT Reduction Measures

TDM Measures	Description	Feasible for the Proposed Project to Implement?	Potential Reduction
5A. Transit Service Expansion	Expanding the transit network increases the transit system's ability to accommodate existing and future travel demand, particularly for peak period commute trips. This strategy provides an effective alternative to congested freeways and roadways for travelers and can reduce vehicle miles traveled by increasing transit ridership. Transit network service improvements should be coordinated closely with the operating transit agency.	No – The operation and deployment of transit routes within the City of Santee is under the jurisdiction of MTS. Therefore, neither the City nor the project applicant have the authority to expand the transit network. Bus route 834 has a stop at the intersection of Carlton Oaks Drive & West Hills Parkway and MTS does not have plan to increase the transit services or transit frequency.	N/A
5B. Transit Frequency Improvements	Transit frequency improvements can be implemented system-wide or on individual routes. Frequency improvements increase transit ridership by reducing travel times, which improve the user experience and increase the attractiveness of transit service. Transit network service improvements should be coordinated closely with the operating transit agency.	No – The operation and deployment of transit routes within the City of Santee is under the jurisdiction of MTS. Therefore, neither the City nor the project applicant have the authority to change the frequency of transit routes within the City.	N/A
5C. Transit-Supportive Treatments	Roadway infrastructure and/or traffic signal modifications can improve transit travel times and reliability, leading to mode shift to transit. Treatments can include transit signal priority, bus-only signal phases, queue jumps, curb extensions to speed passenger loading, and dedicated bus lanes. Transit-supportive treatments should be coordinated closely with the operating transit agency.	No – Since no regional transit lines access the Proposed Project site any Transit Supportive Treatments implemented within the City would have minimal to no effect on project related VMT.	N/A
5D. Transit Fare Reduction	Transit pricing strategies are designed to reduce the costs associated with using transit, thereby creating incentives for people to shift from other traveling modes. Fare reductions can be implemented system-wide, in specific fare-free or reduced fare zones. This strategy varies from Employer Transit Pass Subsidy (Strategy 1D) which can be offered through employer-based benefits programs in which the employer fully or partially pays the employee's cost of transit.	No – The operation and deployment of transit routes within the City of Santee is under the jurisdiction of MTS. Therefore, the City nor the project applicant have the authority to change transit fares.	N/A

Notes:
[1]Note this reduction would only apply to the hotel guests and would not reduce the VMT per Capita or VMT per employee for the project site. Thus, To be conservative guest related VMT reductions were not assumed in the analysis as they may not directly related to the VMT per Employee metrics that is evaluated.
[2]Assumes 20% of employees would be eligible to participate in the program (based on estimation from the Project Applicant).

As shown in Table 3.4, the following TDM measures included in the Mobility Management VMT Reduction Calculator Tool were identified to be feasible for the Proposed Project to implement:

1A. Voluntary Employer Commute Program (0.7% for Employees)
1C. Employer Carpool Program (Accounted for by 1A)
1D. Employer Transit Pass Subsidy (0.0%)
1E. Employer Vanpool Program (Accounted for by 1A)
2B. Mixed Use Development (Reductions accounted for by the SANDAG Model)
3A. Parking Pricing (7.5% for hotel guests)
3B. Parking Cash Out (2.4% for employees)
4E. Bikeshare (0.0%)
4G. Community-Based Travel Planning (2.0%)

VMT Reduction worksheets are provided in Attachment B.

3.7 Proposed Project Impacts

The total VMT reduction associated with the measures listed above would be 3.2% for employment related VMT and 2.0% for residential related VMT. As identified in Table 3.2, the Proposed Project would have to reduce its VMT/Capita by 22.4% for the City of Santee or 29.4% for the City of San Diego, as well as its VMT/Employee by 16.6% to reduce the project related impacts to less than significant. Table 3.4 summarizes the Proposed Project's anticipated VMT with the implementation of the TDM plan.

Table 3.4 Proposed Project VMT with TDM Plan

Impact Type	Proposed Project VMT	Reduction with TDM Plan	Proposed Project VMT with TDM	VMT Threshold	Impact Mitigated?
VMT / Capita (Santee)	22.8	2.0%	22.3	17.7	No
VMT / Capita (San Deigo)	22.8	2.0%	22.3	16.1	No
VMT / Employee (Both)	19.3	3.2%	18.7	16.1	No

Note:
Proposed Project VMT with TDM Calculations:
VMT / Capita: 22.8 miles X (100%-2%) = 22.3 miles
VMT / Employee: 19.3 miles X (100%-3.2%) = 18.7 miles

As shown, the implementation of these TDM measures would not reduce the project related impact to less than significance. Therefore, the Proposed Project would still have significant and unavoidable transportation VMT impact for CEQA purposes since no feasible mitigation measures could be identified.

3.8 San Diego River Trail

The San Diego River trail is a regional Class I Multi-Use path that runs along the San Diego River and connects between the Lakeside Baseball Fields and the western terminus within the City of Santee. There is currently a gap in the trail between the intersection of Mast Boulevard / SR-52 EB Ramps and the eastern Proposed Project boundary. San Diego Association of Governments (SANDAG) has developed a plan to complete this portion of the San Diego River Trail by constructing it along the southern edge of the Proposed Project site. A Mitigated Negative Declaration (MND) was adopted by their Transportation Committee on June 16, 2017 (SANDAG 2017), and the bikeway is currently in the engineering design phase, with a construction schedule still to be set. The SANDAG Segment is planned to be funded

through Transnet, the regional half- cent sales tax for transportation administered by SANDAG, although construction funds have not yet been identified. (See Appendix C).

Based on discussions with the City of San Diego, the Proposed Project will implement a graded bench on both the north and south side of the Proposed Project's western driveway to accommodate the future Carlton Oaks segment of the San Diego River Trail, as shown in Figure 3.1, if this alignment is chosen in the final design.

As shown in Figure 3.1, the proposed alignment of the Carlton Oaks Segment of the San Diego River Trail would cross the Proposed Project's western access point. The Proposed Project will implement a high visibility crosswalk and install trail crossing signage at the driveway to alert motorists of the trail's presence. Additionally, based on the design of the graded bench, cyclists will need travel approximately 100 feet, at grade, towards West Hills Parkway prior to crossing the project driveway. This will provide additional time and visual opportunities for cyclists to see traffic turning into and out of the driveway, as well as provide additional opportunities for motorists to see cyclists utilizing the pathway. Additionally, the future improved trail would be constructed based on NACTO, FHWA, and City of San Diego standards, as appropriate. Therefore, the implementation of the San Diego River Trail is not anticipated to create an additional safety hazard at the project driveway.

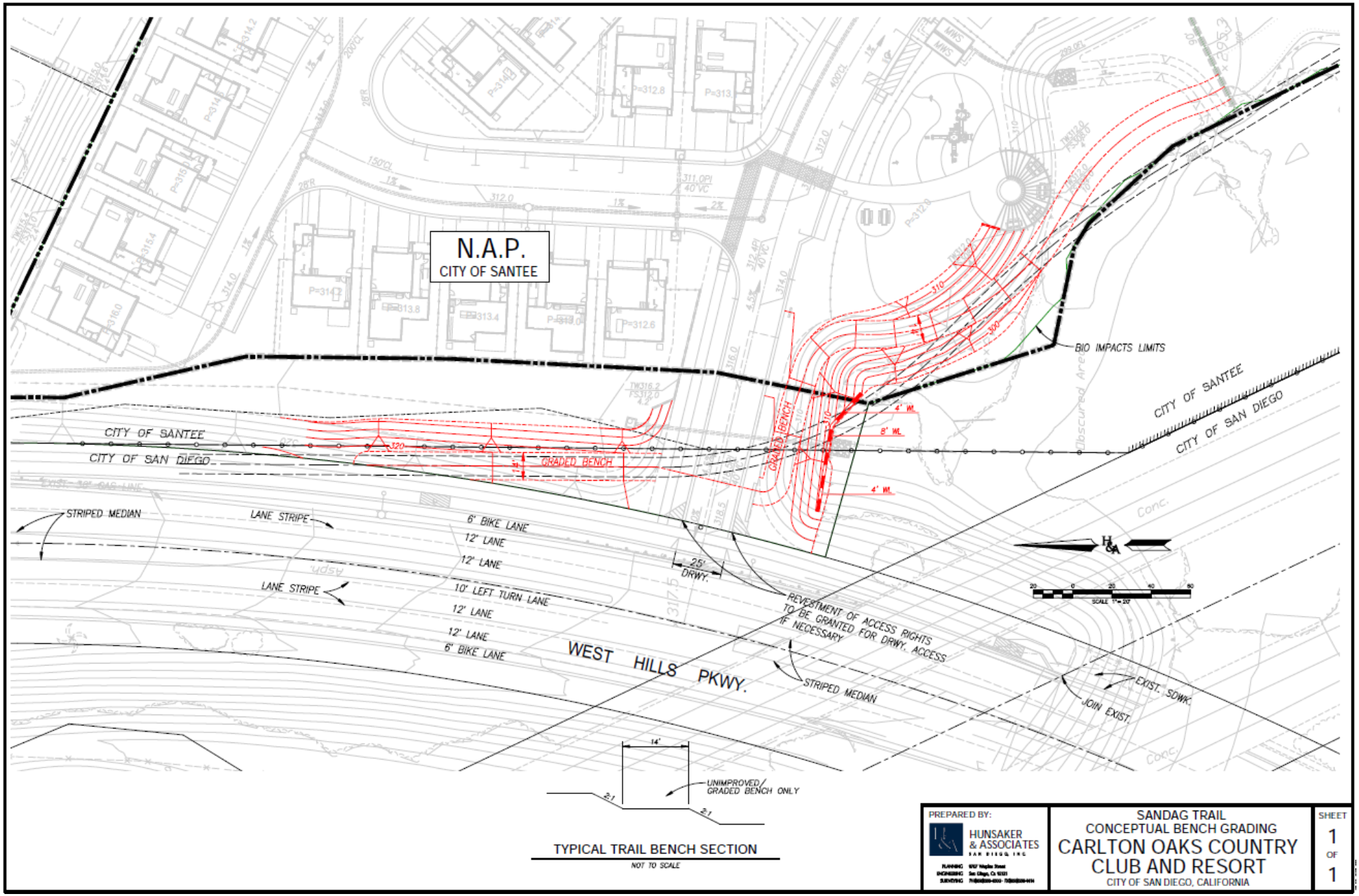
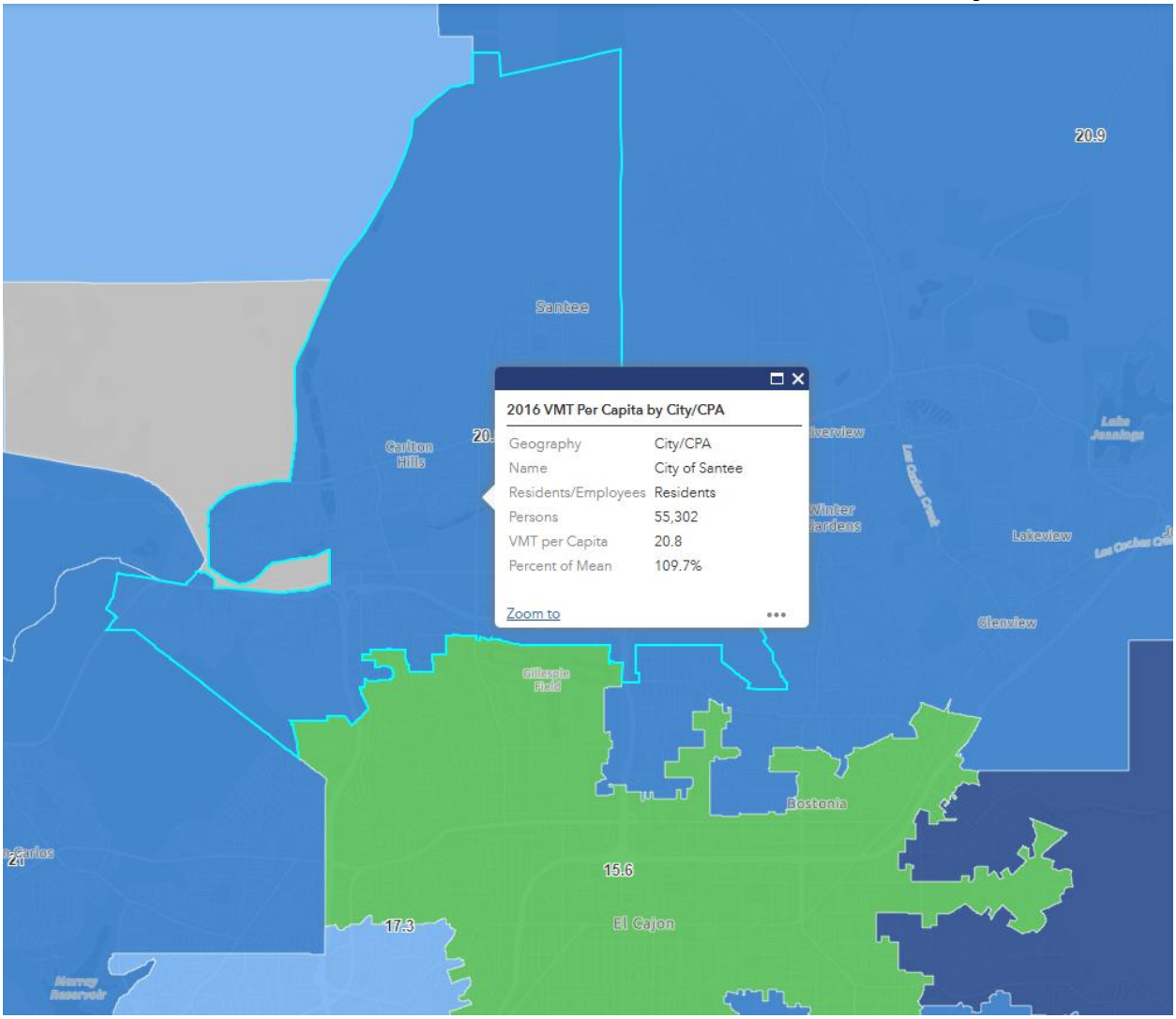
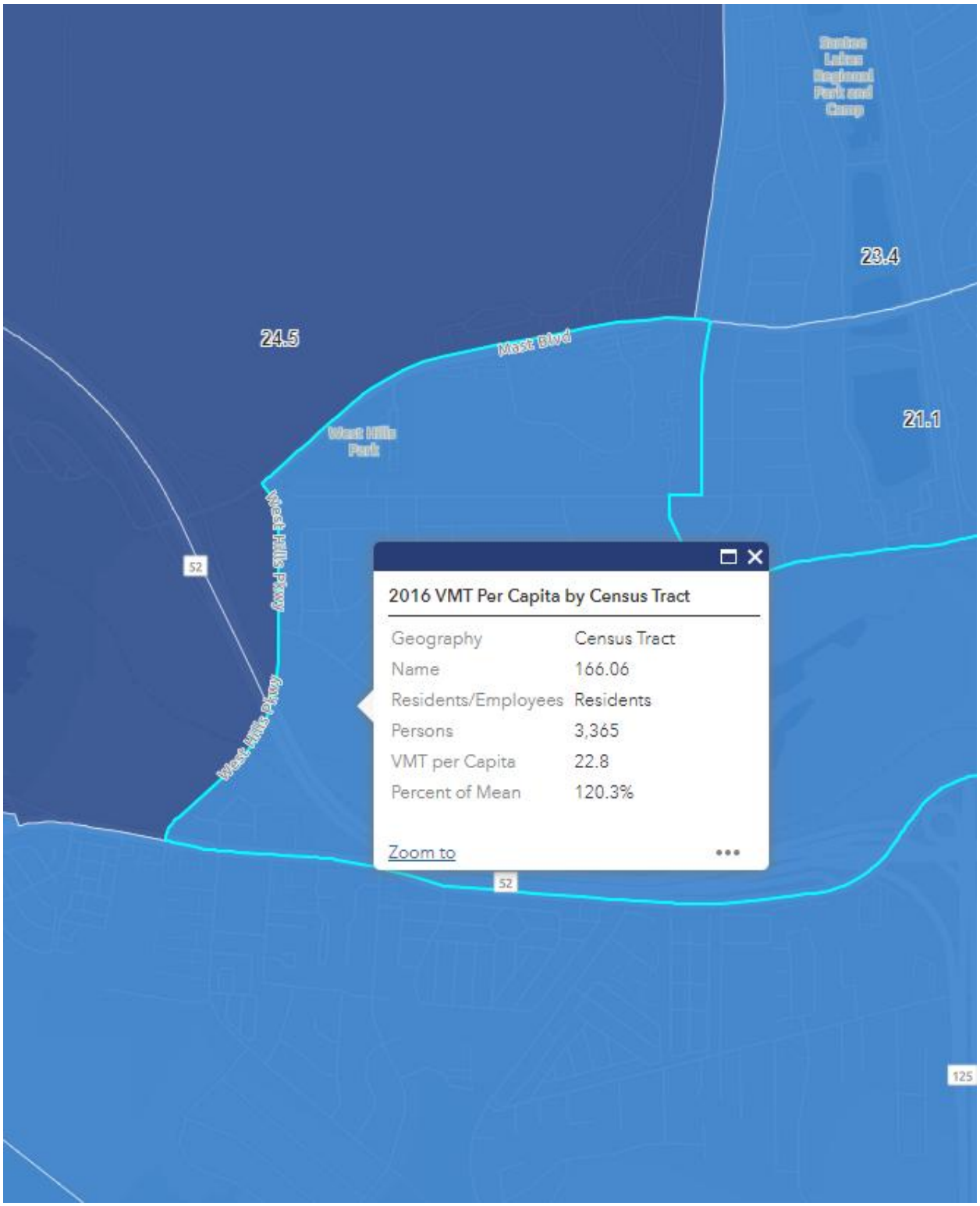


Figure 3.1
Proposed Bicycle Improvements

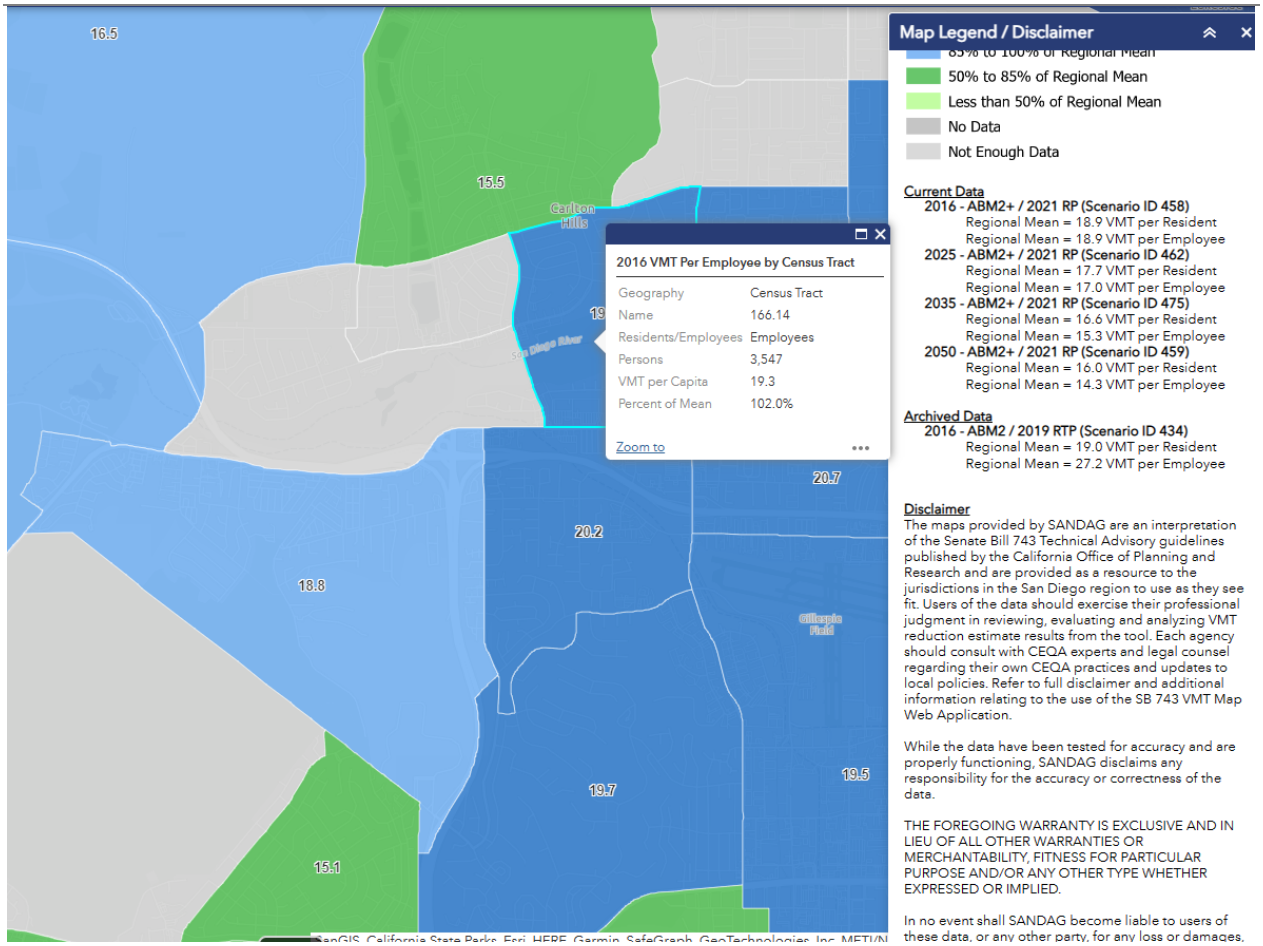
Appendix A
SANDAG SB-743 VMT Analysis Results



Santee Citywide VMT Per Capita – Threshold



Proposed Project VMT per Capita



Proposed Project VMT per Employee

Appendix B
VMT Reduction Worksheets

MOBILITY MANAGEMENT VMT REDUCTION CALCULATOR TOOL

Return to Main
Print Results

	Project-Level Strategies	VMT Type	Change in VMT	Exclusions
Employer Commute Trip Reduction Programs				
1A	Voluntary Employer Commute Program	Employee commute trips	-0.7%	
1B	Mandatory Employer Commute Program	Employee commute trips		Strategy 1A selected
1C	Employer Carpool Program	Employee commute trips		Included in 1A or 1B
1D	Employer Transit Pass Subsidy	Employee commute trips		Included in 1A or 1B
1E	Employer Vanpool Program	Employee commute trips		Included in 1A or 1B
1F	Employer Telework Program	Employee commute trips		
Land Use Strategies				
2A	Transit Oriented Development	Project-generated trips		
2B	Mixed Use Development	Project-generated trips		
Parking Management				
3A	Parking Pricing	Project-generated trips	-7.5%	
3B	Parking Cash Out	Employee commute trips	-2.4%	
	Employee Commute Trips - Total Change in VMT		**-3.1%**	
	Project-Generated Trips - Total Change in VMT		**-7.5%**	

MOBILITY MANAGEMENT VMT REDUCTION CALCULATOR TOOL

The selected Scale of Analysis is "project/site;" these strategies do not apply.

Return to Main
Print Results

	Community/City-Level Strategies	VMT Type	Change in VMT	Exclusions
Neighborhood Enhancements				
4A	Street Connectivity Improvement	All city/CPA trips		
4B	Pedestrian Facility Improvement	All city/CPA trips		
4C	Bikeway Network Expansion	All city/CPA trips		
4D	Bike Facility Improvement	Trips on roadway with bikeway addition		
4E	Bikeshare	All city/CPA trips		
4F	Carshare	All city/CPA trips		
4G	Community-Based Travel Planning	All city/CPA trips	-2.0%	
Transit Strategies				
5A	Transit Service Expansion	All city/CPA trips		
5B	Transit Frequency Improvements	All city/CPA trips		
5C	Transit-Supportive Treatments	All city/CPA trips		
5D	Transit Fare Reduction	All city/CPA trips		
5E	Microtransit NEV Shuttle	All city/CPA trips		

All City/CPA Trips - Total Change in VMT	-2.0%
Trips on Roadway Affected by Bikeway Addition - Total Change in VMT	0.0%

Because the user has calculated the VMT reduction for this strategy, the results for 1B will be excluded from the Results Summary total.

1A. Voluntary Employer Commute Program

Level of application: **Project/Site**
Type of VMT affected: **Employee commute trips**
Max VMT reduction: **6.2%**

Return to Main
Results Summary

Description: Employer offers a voluntary employer commute trip reduction program. The program may include a carpool or vanpool program, subsidized or discounted transit passes, bike amenities, commute trip reduction marketing, and preferential parking permit program. **This strategy encompasses strategies 1C (Employer Carpool Program), 1D (Employer Transit Pass Subsidy), and 1E (Employer Vanpool Program) and cannot be analyzed in combination with these strategies.** Unlike strategy 1B (Mandatory Employer Commute Program), this strategy does not require monitoring, reporting, or performance standards. **If this strategy is selected, strategy 1B cannot be analyzed as part of the total VMT reduction.**

Is the program contractually required of the developer or property owner and accompanied by a regular performance monitoring and reporting program?	no	user input, source (1)
Place type of project/site	low density suburb	user input
% of employees eligible	12%	user input
% change in commute VMT	-6.2%	coefficient, source (2, 3)
Change in VMT	-0.7%	☐ Exclude from Results

Formula: % Change in VMT = % of employees eligible * % change in commute VMT

Sources:

(1). California Air Pollution Control Officers Association. 2010. "Quantifying Greenhouse Gas Mitigation Measures." www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf
(2). Cambridge Systematics. 2009. "Moving Cooler: An Analysis of Transportation Strategies for Reducing Greenhouse Gas Emissions." Technical Appendices. Prepared for the Urban Land Institute. www.reconnectingamerica.org/assets/Uploads/2009movingcoolerexecsumandappend.pdf
(3). Boarnet, Marlon G., Hsin-Ping Hsu, and Susan Handy. 2014. "Impacts of Employer-Based Trip Reduction Programs and Vanpools on Passenger Vehicle Use and Greenhouse Gas Emissions: Policy Brief." www.arb.ca.gov/cc/sb375/policies/ebtr/ebtr_brief.pdf

This strategy is included as a part of 1A or 1B. The result for 1C will not be calculated unless the user deselects 1A or 1B.

1C. Employer Carpool Program

Level of application: **Project/Site**
Type of VMT affected: **Employee commute trips**
Max VMT reduction: **8.0%**

Return to Main
Results Summary

Description: Employers can encourage carpooling by providing ridematching assistance to employees; providing priority parking for carshare vehicles; and providing incentives for carpooling.

Place type of project/site	low density suburb	user input, source (1)
% of employees eligible	9%	user input
% change in commute VMT	-3.0%	coefficient, source (2, 3, 4)
Change in VMT		☐ Exclude from Results

Formula: % Change in VMT = % of employees eligible * % change in commute VMT

Sources:

(1). Ewing, R. 1993. "TDM, Growth Management and the Other Four out of Five Trips." Transportation Quarterly, Vol. 48, No. 3.
(2). Victoria Transport Policy Institute. "Ridesharing: Carpooling and Vanpooling." TDM Encyclopedia. www.vtpi.org/tdm/tdm34.htm
(3). California Air Pollution Control Officers Association. 2010. "Quantifying Greenhouse Gas Mitigation Measures." www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf
(4). New York State Department of Transportation. 2019. Data from 511NYRideshare program participants.

This strategy is included as a part of 1A or 1B. The result for 1D will not be calculated unless the user deselects 1A or 1B.

1D. Employer Transit Pass Subsidy

Level of application: **Project/Site**
Type of VMT affected: **Employee commute trips**
Max VMT reduction: **10.9%**

Return to Main
Results Summary

Description: Employers can encourage employees to take transit by subsidized or discounted daily or monthly public transit passes to employees.

Place type of project/site	low density suburb	user input
Transit subsidy ($/day)		user input
% of employees eligible		user input
% change in commute VMT		coefficient, source (1, 2, 3)
Change in VMT		☐ Exclude from Results

Formula: % Change in VMT = % of employees eligible * % change in commute VMT

Sources:

(1). Nelson Nygaard. 2010. “Santa Monica LUCE Trip Reduction Impacts Analysis.” City of Santa Monica Land Use and Circulation Element, Final EIR. www.smgov.net/Departments/PCD/Plans/2010-Land-Use-and-Circulation-Element/
(2). Transportation Research Board. 2010. "TCRP Report 95 Chapter 19: Employer and Institutional TDM Strategies." www.trb.org/Publications/TCRPReport95.aspx
(3). Boarnet, Marlon G., Hsin-Ping Hsu, and Susan Handy. 2014. “Impacts of Employer-Based Trip Reduction Programs and Vanpools on Passenger Vehicle Use and Greenhouse Gas Emissions: Policy Brief.” www.arb.ca.gov/cc/sb375/policies/ebtr/ebtr_brief.pdf

Strategy does not apply to project. No change in VMT.
This strategy is included as a part of 1A or 1B. The result for 1E will not be calculated unless the user deselects 1A or 1B.

1E. Employer Vanpool Program

Level of application: **Project/Site**
Type of VMT affected: **Employee commute trips**
Max VMT reduction: **7.1%**

Return to Main
Results Summary

Description: Vanpooling is a flexible form of public transportation that provides groups of 5–15 people with a cost-effective and convenient rideshare option for commuting. An employer can encourage ridesharing by subsidizing vanpooling for employees that have a similar origin and destination and by providing priority parking for employees that vanpool.

The SANDAG Vanpool Program provides a subsidy of up to $400 per month to offset the vehicle lease cost.

Does employer sponsor a vanpool program?	no	user input Strategy does not apply to project. No change in VMT.
Default % of employees participating in vanpool	2.7%	constant, source (1)
User override of % of participating employees		user input, optional
Vanpool participation rate used for calculation	2.7%	calculated
One-way length of average auto commute (miles)	12.7	coefficient, source (2)
User override of length of average auto commute (miles)		user input, optional
Length of auto commute used for calculation	12.7	calculated
One-way length of long (vanpool) commute (miles)	42.0	constant, source (3)
User override of length of long (vanpool) commute (miles)		user input, optional
Length of long (vanpool) commute used for calculation	42.0	calculated
Average vanpool occupancy (including driver)	6.25	constant, source (3)
Change in VMT		☐ Exclude from Results

Formula: % Change in VMT = $(M_A*L_A + M_V*L_V/O_V) / (M_A*L_A + M_V*L_V) - 1$

where
M_A = auto (non-vanpool) mode share
M_V = vanpool/long trip mode share
L_A = length of average auto commute trip
L_V = length of vanpool/long commute trip
O_V = average vanpool occupancy
If the user override of vanpool participation rate exceeds maximum of 15%, the default value will be used, source (4, 5).

Sources:
(1). SANDAG. 2018. Commute Behavior Survey.
(2). SANDAG. 2016. Activity Based Model. (v14.0.1, scenario ID 232)
(3). SANDAG. 2018. SANDAG Vanpool Program
(4). Transportation Research Board. 2005. "TCRP Report 95 Chapter 5 Buspools and Vanpools." www.trb.org/Publications/TCRPReport95.aspx
(5). New York State Department of Transportation. 2019. Data from 511NYRideshare program participants.

2B. Mixed Use Development

Level of application: **Project/Site**
Type of VMT affected: **Project-generated trips**
Max VMT reduction: **30.0%**

Return to Main
Results Summary

Description: Mixed use projects incorporate a range of complementary land uses that provide a balanced development approach relative to the surrounding neighborhood and encourage transportation alternatives. This could include co-location residential development, office space, retail shops, and others. Land use mix is measured using an entropy index. An index of 0 indicates a single land use while an index of 1 indicates equal distribution of all land uses. For ease of use, the strategy is calculated using only two land use types - residential (number of residents) and commercial (number of jobs).

Default Santee land use index	0.80	calculated using current data, source (1)
User override of existing land use index		user input, optional
Existing land use index used for calculation	0.80	calculated from user inputs
Residents added with project		user input
Jobs added with project		user input
Land use index of project site with project		calculated
% change in land use index with strategy		calculated
Elasticity	-0.09	constant, source (2)
Change in VMT (as compared to single-use project)		☐ Exclude from Results

Formula: % Change in VMT = % change in land use index * elasticity

land use index = -A/(ln(2))
A=(b1/a)*ln(b1/a) + (b2/a)*ln(b2/a)
a= residents + jobs
b1 =residents
b2 = jobs
% change in land use index with strategy is capped at 500%, source (3).
Change in VMT is capped at -30%, source (3).

Sources:
(1). SANDAG. 2016. Land Use Inventory (SPACECORE).
(2). Ewing, R., and Cervero, R. 2010. "Travel and the Built Environment - A Meta-Analysis." Journal of the American Planning Association.
(3). California Air Pollution Control Officers Association. 2010. "Quantifying Greenhouse Gas Mitigation Measures." www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf

3A. Parking Pricing

Level of application: **Project/Site**
Type of VMT affected: **Project-generated trips**
Max VMT reduction: **7.5%**

Return to Main
Results Summary

Description: Priced parking can be implemented on- or off-street and helps to effectively manage the parking supply. Priced parking works best in areas where on-street parking is managed (e.g., priced parking, residential permit programs, time limits, etc.) to reduce unintended consequences of parking in adjacent neighborhoods.

Parking price unit	$/day	user input
Existing parking price ($/day)	$0.00	user input
Parking price with project ($/day)	$5.00	user input
% change in parking price	50%	calculated
Elasticity	-0.15	constant, source (1)
Change in VMT	**-7.5%**	☐ Exclude from Results

Formula: % Change in VMT = % change in parking price * elasticity
A minimum 25% price change is needed to affect VMT, source (2).
% change in price is capped at minimum of -50% and maximum of 50%, source (2).

Sources:

(1). Transportation Research Board. 2009. "TCRP Report 95 Chapter 13 Parking Pricing and Fees". p13-4. www.trb.org/Publications/TCRPReport95.aspx

(2). Cambridge Systematics. 2009. "Moving Cooler: An Analysis of Transportation Strategies for Reducing Greenhouse Gas Emissions." Technical Appendices. Prepared for the Urban Land Institute. www.reconnectingamerica.org/assets/Uploads/2009movingcoolerexecsumandappend.pdf

3B. Parking Cash Out

Level of application: **Project/Site**
Type of VMT affected: **Employee commute trips**
Max VMT reduction: **12.0%**

Return to Main
Results Summary

Description: Employers can offer employees who are provided free parking the option to take the cash value of the space in lieu of the space itself. California state law (AB 2109, Katz) requires that certain employers who provide subsidized parking for their employees offer a cash allowance in lieu of a parking space. This strategy is only applicable where employers pay for or rent parking for their employees.

Parking cash-out is most successful when paired with incentives or programs that encourage the use of transportation alternatives.

% of employees who participate	20%	user input
% change in commute VMT among participants	-12%	constant, source (1, 2)
Change in VMT	**-2.4%**	☐ Exclude from Results

Formula: % Change in VMT = % of employees who participate * % change in commute VMT among participants

Sources:
(1). California Air Resources Board. 2009. "California's Parking Cash-Out Program: An Informational Guide for Employers." www.arb.ca.gov/planning/tsaq/cashout/cashout_guide_0809.pdf
(2). Shoup, Donald C. 2005. "Parking Cash Out." Planners Advisory Service, American Planning Association. http://shoup.bol.ucla.edu/ParkingCashOut.pdf

The selected Scale of Analysis is "project/site;" this strategy does not apply.

4C. Bikeway Network Expansion

Level of application: **City/CPA**
Type of VMT affected: **All city/CPA trips**
Max VMT reduction: **5.0%**

Return to Main
Results Summary

Description: A bikeway network includes an interconnected system of bike lanes, bike paths, and cycle tracks (Class I, Class II, and Class IV facilities). Bike facilities may share the roadway with vehicles or provide a dedicated pathway that separates bikes from cars or pedestrians. Increasing the network of bike facilities help to encourage biking as a safe and convenient alternative to driving. **If this strategy is selected, strategy 4D (Bike Facility Improvement) cannot be analyzed as part of the total VMT reduction.**

Would the project expand a network of bikeways or add a single bikeway?		user input
Default Santee bicycle mode share (all trips)	0.3%	coefficient, source (1)
User override of existing bicycle mode share		user input, optional
Existing bicycle mode share used for calculation	**0.3%**	calculated
Default Santee auto mode share (all trips)	94.0%	coefficient, source (1)
User override of existing auto mode share		user input, optional
Existing auto mode share used for calculation	**94.0%**	calculated
Are any of the current or proposed bikeways in Santee classified as Class III? For Caltrans' guide to bikeway classifications click here.		user input
Existing bikeway miles (only Class I, II, and IV) in Santee		user input
Additional bikeway miles (only Class, I, II, and IV) in Santee with project		user input
% change in bikeway miles (only Class I, II, and IV)		calculated
Regional average one-way bicycle trip length (miles)	2.9	constant, source (1)
User override of one-way bicycle trip length (miles)		user input, optional
Bicycle trip length used for calculation (miles)	**2.9**	calculated
Regional average one-way auto trip length (miles)	6.5	constant, source (1)
User override of one-way auto trip length (miles)		user input, optional
Auto trip length used for calculation (miles)	**6.5**	calculated
Elasticity of bike commuters with respect to bikeway miles per 10,000 population	0.25	constant, source (2)
Change in VMT		☐ Exclude from Results

Formula: % Change in VMT = (-1) * % change in bikeway miles * elasticity * existing bike mode share * bike trip length / (existing auto mode share * auto trip length)

VMT change capped at 5.0%, assuming 10% maximum of auto trips can shift to bicycle and one-way bike trip length of 2.9 miles

Sources:
(1). SANDAG. 2016. Activity Based Model. (v14.0.1, scenario ID 232)
(2). Pucher, J. and R. Buehler. 2011. "Analysis of Bicycling Trends and Policies in Large North American Cities: Lessons for New York." Report for U. S. Department of Transportation, Research and Innovative Technology Administration, Washington, D.C. and UTRC II New York.

The selected Scale of Analysis is "project/site;" this strategy does not apply.

4E. Bikeshare

Level of application: **City/CPA**
Type of VMT affected: **All city/CPA trips**
Max VMT reduction: **0.1%**

Return to Main
Results Summary

Description: Bikeshare programs help to reduce traffic congestion and demand for parking by providing users with on-demand access to bikes for short-term rental. Bikeshare systems that feature electrified vehicles (scooters, e-bikes) help increase the range of the bike trip, making these services convenient and attractive to users. Providing discounted bikeshare memberships or dedicated bikeshare parking can encourage users and improve the user experience.

Major Statistical Area (MSA) of program expansion (To locate the MSA, use SANDAG's online Parcel Lookup Tool)		user input
% of population in Santee that will have access to the expanded bike share system		user input
Bike share daily one-way trips per 1000 residents		coefficient, source (1)
% of e-bike share trips replacing auto trips	37%	constant, source (2)
Average daily one-way auto trips per adult in Santee	3.1	coefficient, source (3)
Regional average one-way auto trip length (miles)	6.5	coefficient, source (3)
User override of one-way auto trip length (miles)		user input, optional
One-way auto trip length used for calculation (miles)	**6.5**	calculated
Average one-way e-bike trip length (miles)	1.7	constant, source (4)
Change in VMT		☐ Exclude from Results

Formula: % change in VMT = -1 * (% of population with access * daily bike share trips per person * auto substitution rate * bike share trip length) / (average daily auto trips per person * auto trip length)

Sources:
(1). WSP. 2019. “Draft TDM Off-Model Methodology—March 2019 Revision.” Memo to SANDAG.
(2). MacArthur, J., M. Harpool, D. Scheppke. 2018. “North American survey of electric bike owners." National Institute for Transportation and Communities: Washington D.C.
(3). SANDAG. 2016. Activity Based Model. (v14.0.1, scenario ID 232)
(4). SANDAG. 2018. Anonymized and aggregated data from bikeshare operators in San Diego.

The selected Scale of Analysis is "project/site;" this strategy does not apply.

4G. Community-Based Travel Planning

Level of application: **City/CPA**
Type of VMT affected: **All city/CPA trips**
Max VMT reduction: **2.0%**

Return to Main
Results Summary

Description: Community-based travel planning (CBTP) is a residential-based approach to outreach that provides households with customized information, incentives and support to encourage the use of transportation alternatives. The approach involves a team of trained 'Travel Advisors' engaging residents at home or in their communities to offer information, incentives, and advice about how members of households can travel in alternative ways that meet their needs. Teams of trained Travel Advisors visit all households within a targeted geographic area, have tailored conversations about residents' travel needs, and educate residents about the various transportation options available to them. Due to the personalized outreach method, communities are typically targeted in phases.

Households in Santee	20,302	coefficient, source (1)
Households in Santee that are targeted	20,302	user input
% of households that are targeted	**100%**	calculated
% of targeted households that participate	17%	constant, source (2)
% of SOV trip reduction among participating households	12%	constant, source (2, 3)
Change in VMT	**-2.0%**	☐ Exclude Results

Formula: % Change in VMT = -1 * % of households in community that are targeted * % of targeted households that participate * % reduction in SOV trips among participating households

Sources:
(1). SANDAG. 2016. Land Use Inventory (SPACECORE).
(2). Results from program evaluations including King County Metro Transit. 2014, 2015, 2017; North Coast Corridor Program. 2014; Portland Bureau of Transportation. 2010; Community Transit. n.d. Curb @ Home.
(3). WSP. 2019. "Draft TDM Off-Model Methodology—March 2019 Revision." Memo to SANDAG.

Appendix C
San Diego River Trail Plan

San Diego River Trail – Carlton Oaks Golf Course Segment

State Clearinghouse No. 2017031037

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

~~Public Review Draft~~
Final Initial Study/Mitigated Negative Declaration

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

~~March~~ June 2017

Preface

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

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

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

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

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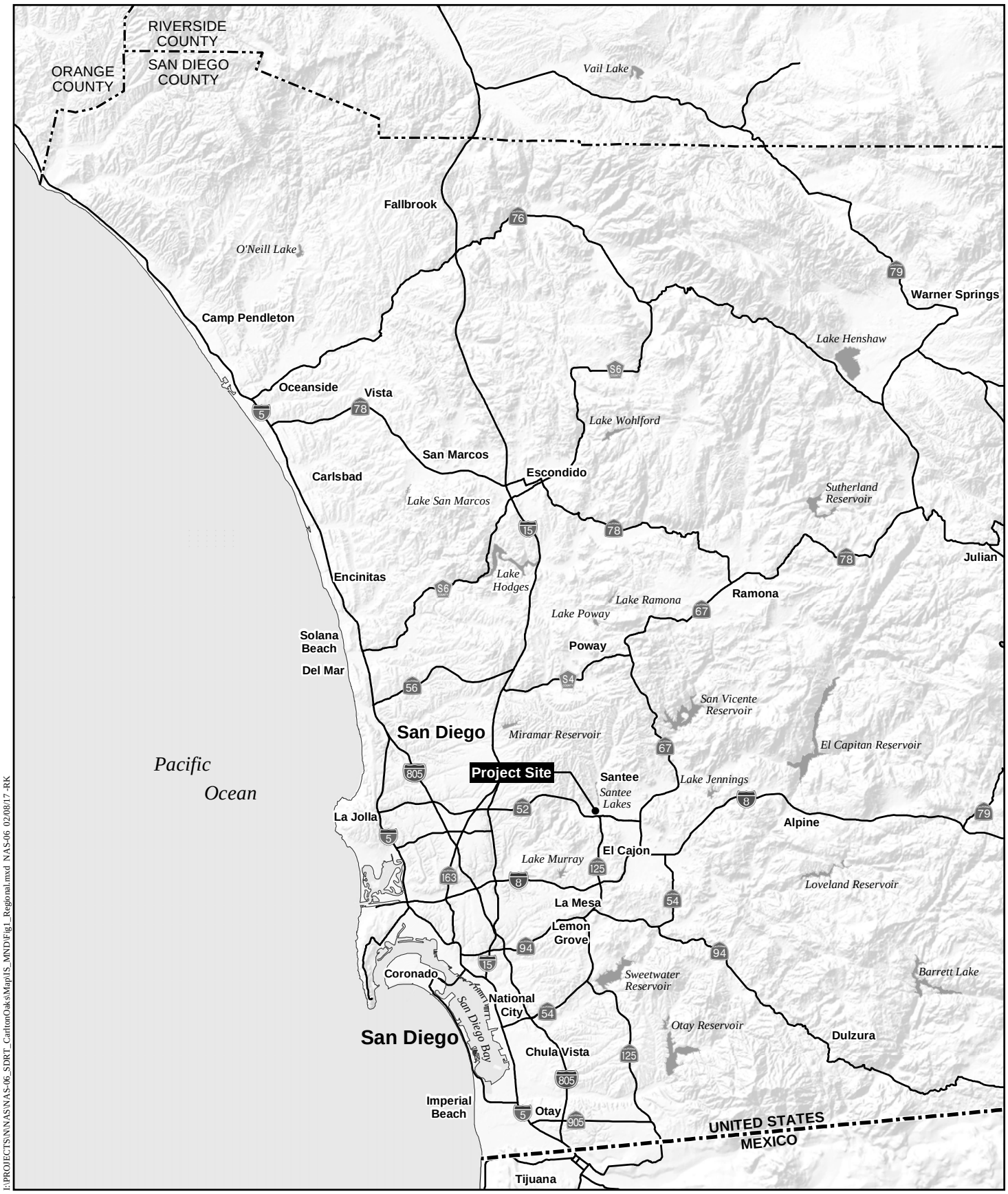
1.0 Introduction

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

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

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



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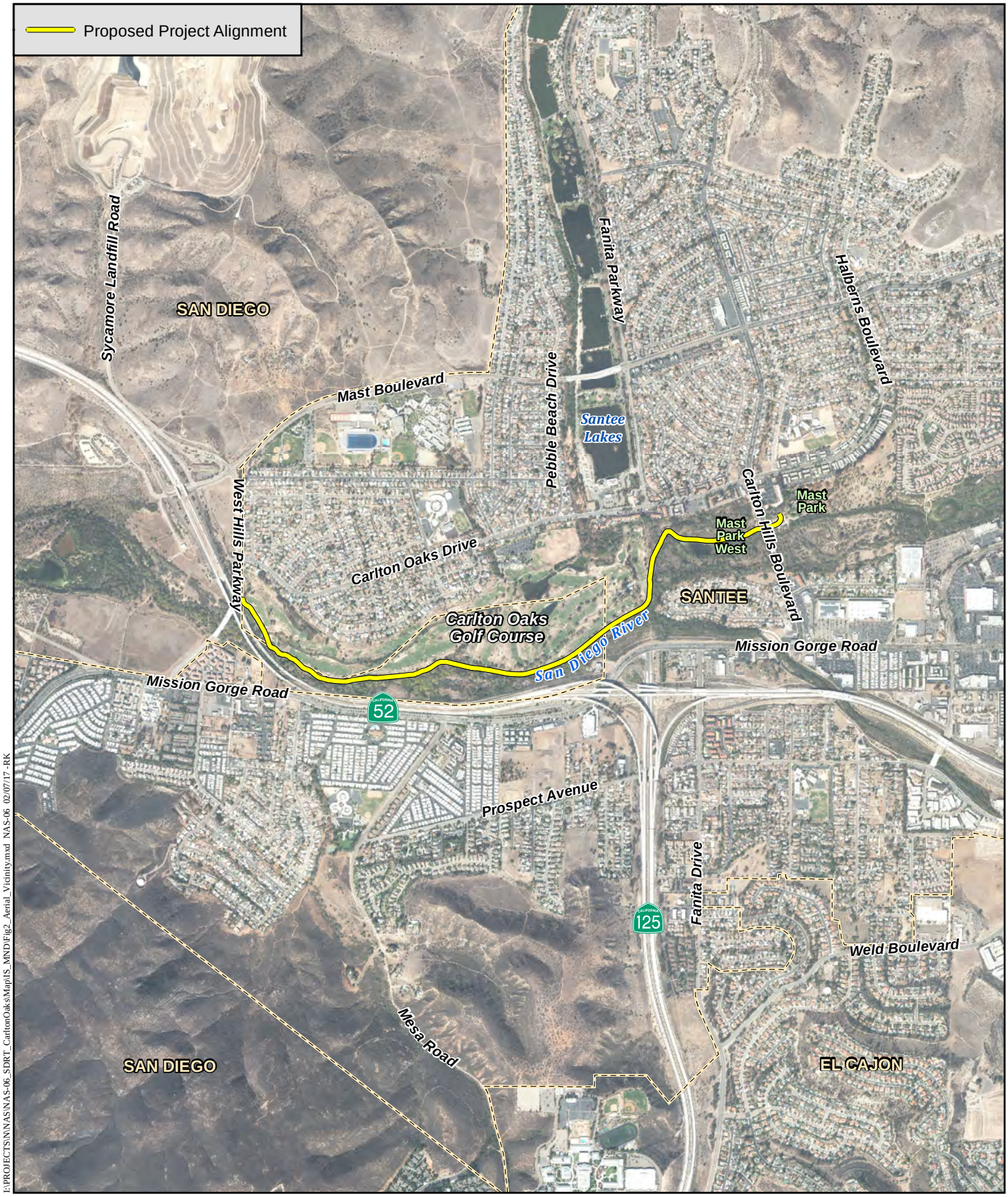
Regional Location Map

SAN DIEGO RIVER TRAIL – CARLTON OAKS GOLF COURSE SEGMENT

N 0 8 Miles

Figure 1



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Project Vicinity Map

SAN DIEGO RIVER TRAIL – CARLTON OAKS GOLF COURSE SEGMENT

N 0 2,000 Feet

Figure 2

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

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

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

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

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

A copy of the Draft IS/MND ~~also is~~was available at the following public libraries:

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

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

2.0 Project Description

Project Background

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

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

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

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

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

Project Characteristics

SANDAG proposes to construct the Carlton Oaks Golf Course Segment of the SDRT as a Class I bikeway for the exclusive use of people walking and riding bikes. The proposed bike path would extend a distance of approximately two miles between Carlton Hills Boulevard and West Hills Parkway through Mast Park, Mast Park West, and the Carlton Oaks Golf Course. The proposed project consists of two segments, the Mast Park/Mast Park West Segment and the Golf Course Segment, as shown on Figures 3a and 3b and described below.

Mast Park/Mast Park West Segment

The Mast Park/Mast Park West Segment begins at the proposed project's eastern terminus in the Mast Park parking lot, and extends west under the Carlton Hills Boulevard bridge, and through Mast Park West to the Carlton Oaks Golf Course. The portion of this segment generally between the Carlton Hills Boulevard bridge and the Carlton Oaks Golf Course is subject to a conservation easement held by the California Department of Fish and Wildlife (CDFW). Among other things, the conservation easement governs allowable uses of this property. The conservation easement would have to be amended in order for the project to be implemented as described below.

The proposed project would begin at the southeastern corner of the paved parking lot in Mast Park and extend southwest down a vegetated slope and adjacent to a driveway that leads to an overflow parking area with a decomposed granite (DG) surface. At the bottom of the slope, the proposed project would continue westward under the Carlton Hills Boulevard bridge and across a small drainage, and then it would follow the alignment of an existing DG trail that extends east-west and northeast-southwest through Mast Park West for approximately 0.5 mile to the edge of the Carlton Oaks Golf Course. This existing trail consists of an approximately 8- to 14-foot-wide DG trail lined with split-rail fencing along with interpretive signage and benches at select locations, as well as a trailhead at Carlton Hills Boulevard. The east-west portion of the existing trail is approximately 14 feet wide with split-rail fencing placed approximately 2 feet inside the DG trail on both sides. The northeast-southwest portion of the existing trail is approximately eight feet wide and lined with split-rail fencing on both sides. The proposed project would be constructed along this existing trail alignment. The portion of the dirt trail between the trailhead and the Carlton Hills Boulevard bridge would not be improved. Existing interpretive signage, benches, and bike racks along the existing trail would not be affected and would remain in their current location.

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Proposed Alignment

SAN DIEGO RIVER TRAIL – CARLTON OAKS GOLF COURSE SEGMENT

N 0 300 Feet

Figure 3a

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Proposed Alignment

SAN DIEGO RIVER TRAIL – CARLTON OAKS GOLF COURSE SEGMENT

N 0 300 Feet

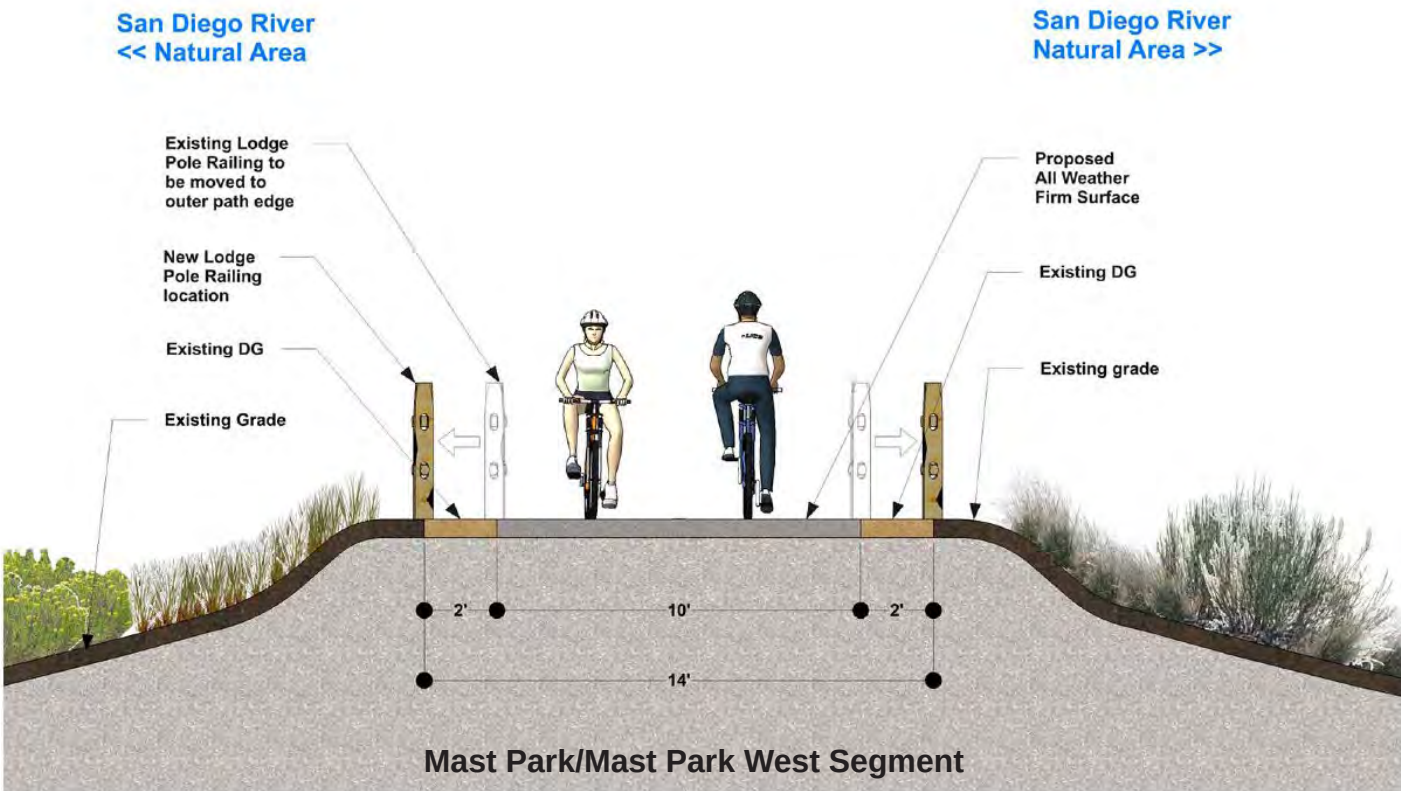
Figure 3b

The proposed project within this segment would consist of a 10-foot-wide, all-weather, paved surface with 2-foot-wide pervious shoulders on each side. The project proposes to incorporate design treatments into the bike path surface during final design such as use of earth-toned colors and textures to visually blend the project surface with the existing visual environment. Split-rail (i.e., lodge pole) fencing would be installed along both sides of the bike path, although in some areas the existing split-rail fencing along the existing trail would be relocated and incorporated into the project, as described below. Along the east-west portion, the existing fencing on both sides of the existing trail would be moved to the outer edges of new bike path.

Along the northeast-southwest portion, the existing trail would be widened on the west side and the existing fencing along the eastern edge of the trail would remain while the existing fencing along the western edge of the existing trail would be moved to the outer edge of the new bike path. The drainage crossing just west of the Carlton Hills Boulevard bridge would consist of a ford with natural bottom. Slope protection or similar measures to control erosion would be installed at locations on the east side of the bike path in slope areas along the northeast-southwest portion of the bike path where erosion is evident. Manufactured slopes created to accommodate the bike path would be at a 2:1 or 3:1 where erosion is evident gradient and would be revegetated with native plant species prior to completion of project construction. A typical cross-section of the proposed project within the Mast Park/Mast Park West Segment is illustrated in Figure 4.

Golf Course Segment

The Golf Course Segment begins at the eastern end of the Carlton Oaks Golf Course at the terminus of the Mast Park/Mast Park West Segment, and extends west along a portion of the southern edge of the golf course to its western terminus at West Hills Parkway. The proposed project within the golf course would generally be constructed on, or adjacent to, the existing berm along the southern edge of the golf course and northern edge of the river for a distance of approximately 1.5 miles. It would consist of a 10-foot-wide, all-weather, paved surface with 2-foot-wide pervious shoulders and split-rail fencing on each side. Here too, the project proposes to incorporate earth-toned pavement colors and textures into the path surface to visually blend the pavement surface into the surrounding area. The existing berm would be improved by expanding, rebuilding, and/or reinforcing areas necessary to support the proposed bike path. Slope protection or similar measures to control erosion would be installed at locations within this segment on the south side of the bike path in slope areas where erosion is evident. Manufactured slopes would be created at a 2:1 or 3:1 gradient and would be revegetated with native species prior to completion of project construction. Near the west end, the proposed project would install a bridge or similar structure to cross Sycamore Creek. A typical cross-section of the proposed project within the Golf Course Segment is illustrated in Figure 4.



Source: KTU+A 2017

Typical Cross-sections

San Diego River Trail – Carlton Oaks Golf Course Segment

Figure 4

Protective Fence

In some areas along the golf course where the proposed project would be in close proximity to the playing field area, protective fencing would be installed along short sections on the north side (golf course side) of the project to protect path users from getting hit by errant golf balls. Protective fencing could be installed along the fairways of holes 3, 4, 5, and 15, and potentially other areas identified during final design. The fencing would be up to 10 feet tall and could be constructed from a variety of materials, such as wood framed, welded wire mesh, or chain link. The fence fabric would be coated with a black, brown, dark green, or other dark color to reduce its visibility. The safety fence may also be angled at the top to reduce the height.

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

Tree Replacement

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

Options for Connecting to West Hills Parkway

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

- **Switchback Ramp Option**: this option entails a switchback ramp that would ascend north and then south along the slope adjacent to the roadway, with a connection point to the existing sidewalk near the westbound SR-52 overcrossing structure. This option would also include installation of a proposed traffic signal and a continental crosswalk along West Hills Parkway at the intersection with Carlton Oaks Drive where the ramp would connect to the existing sidewalk.

- **Curvilinear Ramp Option**: this option would include construction of a curvilinear ramp that would ascend northward along the slope and then curve west to connect perpendicularly to the existing sidewalk. This option also proposes the following improvements along West Hills Parkway:

    - Construction of an approximately 15-foot wide sidewalk to replace the existing sidewalk on the east side of the roadway between where the ramp would connect to the existing sidewalk and the southeast corner of the West Hills Parkway/Carlton Oaks Drive intersection

- Installation of a new guard rail along the proposed widened sidewalk
- Installation of chain-link fencing along a portion of the east side of the widened sidewalk
- Installation of curb ramps at each corner of the West Hills Parkway/Carlton Oaks Drive intersection
- Installation of continental crosswalks at the southern, eastern, and northern approaches to West Hills Parkway/Carlton Oaks Drive intersection to channel people to the existing Class II bike lane along the western (southbound) side of West Hills Parkway
- Relocation of the existing traffic signal at the southeast corner of the West Hills Parkway/Carlton Oaks Drive intersection
- Re-striping of portions of the roadway to accommodate the proposed roadway improvements

- **Linear Ramp Option:** this option consists of a linear ramp along the western edge of the golf course that would gradually ascend northward and connect to the existing sidewalk just south of the intersection of West Hills Parkway and Carlton Oaks Drive. This option would also include the proposed roadway improvements along West Hills Parkway identified above for the Curvilinear Ramp Option, although less area and length would likely be needed for the widened sidewalk and associated roadway improvements (e.g., new guardrail and re-striping).

Retaining Walls

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

Additional retaining walls may be constructed in conjunction with the options for the West Hills Parkway connection. No retaining walls would be required for the Curvilinear Ramp Option. One retaining wall between approximately two and seven feet in height would be constructed for the Switchback Ramp Option along the slope where the ramp would turn to the south. For the Linear Ramp Option, one retaining wall up to approximately two feet in height would be constructed along a portion of the east side of the ramp near where it would connect to the existing sidewalk.

Proposed retaining walls would be constructed with color and texture selected to resemble features within the golf course. Designs to be considered include plantable concrete blocks, textured concrete, post and timber walls, and wooden planks. New walls would include texture and natural colors, and could include poured-in-place concrete, textured block, shotcrete, or other sand-blasted surfaces.

Golf Course Coordination

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

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

Lighting

Pedestrian-scaled lighting may be provided at select locations along the proposed bike path to provide safety and security consistent with the *San Diego River Park Master Plan* (City of San Diego 2013a), which calls for lighting along the San Diego River Pathway. Lighting types would include pole-based lighting consistent with the design guidelines contained within the *San Diego River Park Master Plan* and in accordance with lighting regulations of the City of San Diego (Section 142.0740 in the San Diego Municipal Code; City of San Diego 2014) and the City of Santee (Section 17.30.030 of the Santee Municipal Code; City of Santee 2014). Per the design guidelines of the *San Diego River Park Master Plan*, lighting elements along the San Diego River Pathway should (1) consist of metal or concrete poles and triangular fixtures painted natural sand or warm gray/brown at a maximum height of 12 feet, and (2) be directional with shields to avoid light overspill into adjacent habitat. Proposed project lighting would comply with these design guidelines; lights would be shielded and directed towards the bike path and away from the adjacent San Diego River and its habitats. While project lighting would adhere to the overall design guidelines in the *San Diego River Park Master Plan*, the specifics of the lighting design would be determined during final design in consultation with the resource agencies during project permitting (i.e., U.S. Army Corps of Engineers [USACE], U.S. Fish and Wildlife Service, CDFW, Regional Water Quality Control Board [RWQCB]).

Construction

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

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

- West Hills Parkway (construction access would occur from West Hills Parkway under any of the West Hills Parkway connection options described previously);

- an existing unpaved access road within a Padre Dam Municipal Water District easement on private property owned by the Vista del Verde homeowners association and along the eastern boundary of the golf course accessible from Carlton Oaks Drive (herein referred to as the Padre Dam Easement Construction Access); and/or

- the parking lot at Mast Park, which could require excavation to a depth of approximately three feet under the Carlton Hills Boulevard bridge to provide adequate vertical clearance for construction equipment, and along the existing dirt trail in Mast Park West.

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

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

3.0 SANDAG Discretionary Actions

SANDAG discretionary actions related to the proposed project include:

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

4.0 Other Agency Permits and Approvals

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

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

5.0 Environmental Factors Potentially Affected

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

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

6.0 Determination

On the basis of the initial evaluation that follows:

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

Signature	Date
Keith Greer, Principal Regional Planner	For: San Diego Association of Governments

7.0 CEQA Initial Study Checklist

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

A. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

B. "Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from earlier analyses may be cross-referenced).

C. "Less Than Significant Impact" applies where the project creates no significant impacts, only less than significant impacts.

D. "No Impact" applies where a project does not create an impact in that category. "No Impact" answers do not require an explanation if they are adequately supported by the information sources cited by the lead agency which show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project would not expose sensitive receptors to pollutants, based on a project specific screening analysis).

7.1 Aesthetics and Visual Resources

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Visual Setting

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

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

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

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

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

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

Visual Changes

For the most part, the proposed project would not contrast with the existing visual environment. For one, the introduction of a hard-surface trail where a soft-surface trail currently exists would not create a notable visual change. The widening of the berm to accommodate the bike path would require the removal of up to approximately 100 mature trees along either side of the existing berm within the grading footprint. While golfers and trail users would see this change, viewers from off-site locations would only notice the tree removal if they are already familiar with the area. Most of the existing trees within the golf course would remain, and most of the riparian vegetation within and along the San Diego River would not be disturbed (for additional discussion, refer to Section 7.4, Biological Resources). The proposed project would include revegetation of the berm, as well as installation of replacement trees within the golf course. Trees and shrubs installed on the river side of the berm would be native and appropriate to the habitat specific to the immediate area in which they are placed. Trees removed from the golf course would be replaced at a 1:1 ratio with native or locally appropriate trees species consistent with the existing trees within the golf course. All replaced trees would be a combination of sizes at installation to mimic natural succession and the variety of trees in the area; it is anticipated that approximately 25 percent would be 24-inch boxes, approximately 50 percent would be 15-gallon containers, and approximately 25 percent would be 5-gallon containers. Shrubs and ground cover would be used to revegetate both sides of the berm. Native plants would be used to enhance the habitat areas on the river side, and native and locally appropriate species would be used on the

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

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

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

Other noticeable changes would consist of the construction of retaining walls ranging from one to seven feet tall in certain locations along the north side of the project alignment within the golf course (to reduce the proposed project's encroachment into the existing golf course) and potentially at the west end of the project site as the bike path connects to West Hills Parkway. One retaining wall up to approximately four feet high would be constructed near the tee box on hole 5, and three walls up to approximately four feet high would be constructed near the tee box on hole 15. Two other walls, ranging from one to seven feet tall, would be constructed near the tee box on hole 16. The new retaining walls would be approximately as tall as the existing berm, and would face toward the golf course. Additional retaining walls may be constructed in conjunction with the options for the West Hills Parkway connection. One retaining wall between approximately two and seven feet in height would be constructed for the Switchback Ramp Option and one retaining wall up to approximately two feet in height would be required for the Linear Ramp Option. No retaining walls would be required for the Curvilinear Ramp Option. Most of the proposed retaining walls would only be seen by golfers, particularly if trees and shrubs are used to screen walls from more distant views from residences. Trail users would not see most of the walls, since they would be below the trail and facing the golf course. Proposed retaining walls would include design features, such as use of natural colors and textures visually similar to existing walls and features within the golf course to visually blend them in with the existing visual environment to reduce the potential visual contrast created by the introduction of walls along the trail edge.

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

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

Conclusion

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

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

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

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

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

7.2 Agriculture and Forestry Resources

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the proposed project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	□	□	□	■
b. Conflict with existing zoning for agricultural use or a Williamson Act contract?	□	□	□	■
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	□	□	□	■
d. Result in the loss of forest land or conversion of forest land to non-forest use?	□	□	□	■
e. Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	□	□	□	■

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

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

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

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

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

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

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

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

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

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

7.3 Air Quality

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

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

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

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

The RAQS identifies adopted control measures to reduce ozone precursor emissions. These measures apply to stationary sources such as certain types of boilers, water heaters, and stationary internal combustion engines. The RAQS also identifies incentive programs, transportation control measures (including bicycling improvements), and indirect source programs to reduce ozone precursor emissions from mobile sources. Implementation of the proposed bikeway and related improvements would further implement transportation control measures (i.e., bicycling improvements) identified in the RAQS to reduce ozone precursor emissions from mobile sources, and would not conflict with or obstruct the SDAPCD's implementation of any control measures adopted to reduce ozone precursor emissions from

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

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

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

Less Than Significant Impact. Under the federal Clean Air Act of 1970 and its subsequent amendments, the U.S. Environmental Protection Agency established the National Ambient Air Quality Standards (NAAQS) for criteria pollutants, including CO, sulfur dioxide (SO_2), nitrogen dioxide (NO_2), ozone (O_3), particulate matter of less than 10 microns in size (PM_{10}), particulate matter of less than 2.5 microns in size ($PM_{2.5}$), and lead (Pb). Ozone is not emitted directly, but is formed from a complex set of reactions involving ozone precursors, such as nitrogen oxides (NO_X) and reactive organic gases (ROG). The California Air Resources Board (CARB) subsequently established more stringent California Ambient Air Quality Standards (CAAQS) for these pollutants, as well as for sulfates, hydrogen sulfide, vinyl chloride, and visibility-reducing particles. Areas that do not meet the NAAQS or CAAQS for a particular pollutant are considered to be "non-attainment areas" for that pollutant. On April 30, 2012, the SDAB was classified as a marginal non-attainment area for the 8-hour NAAQS for ozone. The SDAB is an attainment area for the NAAQS for all other criteria pollutants. The SDAB currently falls under a national "maintenance plan" for CO, following a 1998 redesignation as a CO attainment area. The SDAB is currently classified as a non-attainment area under the CAAQS for ozone (serious nonattainment), PM_{10}, and $PM_{2.5}$. The California Clean Air Act does not require preparation of attainment plans for particulate matter.

Construction Emissions

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

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

Table 1
ESTIMATED MAXIMUM DAILY CONSTRUCTION EMISSIONS

Construction Activity	Pollutant Emissions (pounds per day)				
	ROG	NO_X	CO	PM_{10}	$PM_{2.5}$
Grubbing/Land Clearing	2	28	15	4	2
Grading/Excavation	7	82	45	7	4
Drainage/Utilities/ Sub-Grade	5	38	33	5	3
Paving	3	28	22	2	2
Maximum Daily Emissions	7	82	45	7	4
SDAPCD AQIA Trigger Levels	137	250	550	100	55
Significant Impact?	***No***	***No***	***No***	***No***	***No***

Source: Appendix B

Operational Emissions

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

Conclusion

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

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

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

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

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

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

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

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

7.4 Biological Resources

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

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

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

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

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

Special Status Plant Species

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

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

Special Status Animal Species

A total of five special status animal species were observed during biological surveys within the BSA, including the Cooper's hawk (*Accipiter cooperii*), least Bell's vireo, white-tailed kite (*Elanus leucurus*), yellow-breasted chat (*Icteria virens*), and yellow warbler (*Setophaga petechial*). One individual Cooper's hawk (raptor), a CDFW Watch List species and a sensitive species identified in the City of San Diego's MSCP Subarea Plan, was observed perched in southern riparian forest in the western portion of the BSA. Least Bell's vireo, a federal and stated listed endangered species and a sensitive species identified in the City of San Diego's MSCP Subarea Plan, was detected in five locations within and adjacent to the BSA. One individual white-tailed kite (raptor), a State Fully Protected species, was observed flying over the southern riparian forest south in the eastern portion of the BSA. Yellow-breasted chat, a State Species of Special Concern, was detected in two locations in southern riparian forest within the western portion of the BSA. Yellow warbler, a federal Bird of Conservation Concern and State Species of Special Concern, was observed in southern riparian forest in six locations within the BSA. The project would result in impacts to riparian habitat areas used by these five special status bird species that were determined to use portions of the project site for breeding and/or roosting. The project also would result in approximately 5.7 acres of direct permanent impacts to USFWS-designated critical habitat for least Bell's vireo, of which approximately 0.52 acre are to wetland or riparian habitats that are potentially suitable habitat for vireo.

Project impacts to special status animal species would require mitigation, as well as a Federal Endangered Species Act Section 7 consultation with the USFWS and Fish and Game Code Section 2080 Incidental Take Permit with the CDFW. Implementation of mitigation measures BIO-1 and BIO-2 below (along with mitigation measure BIO-4 for direct habitat loss) would avoid or substantially lessen direct impacts to special status animal species, including Cooper's hawk, least Bell's vireo, white-tailed kite, yellow-breasted chat, and yellow warbler because trimming, grubbing, and clearing of habitat for these species during the breeding season would be avoided if feasible, and if not feasible, then pre-construction nesting surveys would be conducted to determine if active nests of these five special status species are present and any detected active nests of these species would be protected through incorporation of identified buffer distances. Impacts to designated critical habitat for least Bell's vireo would be avoided or substantially lessened through mitigation for riparian habitat loss and special conditions as determined through consultation with the USFWS during the CWA 404 permitting process.

BIO-1 If feasible, no trimming, grubbing, or clearing of riparian trees or vegetation shall occur during the breeding season for the least Bell's vireo (March 15-September 15), yellow-breasted chat and yellow warbler (February 15-August 31), or raptors (January 15-July 15). If riparian tree and vegetation trimming, clearing, or grubbing cannot feasibly occur outside of these breeding seasons, then pre-construction nesting surveys, as described below, shall be conducted by a qualified biologist prior to initiating vegetation trimming, clearing, or grubbing activities. The vireo nesting survey shall consist of three surveys spaced seven to ten days apart, with the final survey occurring no more than three days prior to initiating trimming, clearing, or grubbing activities. If nesting vireos are detected during the pre-construction surveys on or within 500 feet of planned clearing or grubbing activities, then clearing or grubbing on or within 500 feet of the nesting vireos shall be postponed until a qualified biologist determines that the young have fledged or the nest is no longer active. The nesting survey for yellow-breasted chat, yellow warbler, and raptors shall consist of one pre-construction nesting survey conducted no more than seven days prior to the commencement of vegetation trimming, clearing, or grubbing to determine if active nests of these species are present in the affected areas. If nesting yellow-breasted chat, yellow warbler, or raptors are detected on or within 300 feet of the impact area during pre-construction surveys, construction on or within 300 feet of the nest shall be postponed until after the young have fledged or the nest is no longer active. The qualified biologist conducting the survey(s) shall have, at a minimum, a bachelor's degree in biology, ecology, zoology, or a related field of science, and at least two years of experience conducting biological field surveys, including surveys for nesting birds.

BIO-2 Mitigation for direct permanent impacts to 0.52 acre of riparian habitat, which is located within USFWS critical habitat for least Bell's vireo, including 0.48 acre of southern riparian forest, 0.04 acre of southern willow scrub, and less than 0.01 acre of mule fat scrub, would be addressed through Section 7 consultation as part of the CWA 404 permitting process and the Fish and Game Code Section 2080 Incidental Taker Permit (if required). The results of the Section 7 consultation and conditions of the Incidental Take Permit (if required) would determine the need, if any, for special conditions or habitat mitigation beyond the mitigation identified for impacts to

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

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

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

degree in biology, ecology, zoology, or a related field of science, and at least two years of experience conducting biological field surveys, including surveys for nesting birds.

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

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

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

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

Table 2
EXISTING VEGETATION COMMUNITIES/LAND USE TYPES
IN THE BIOLOGICAL STUDY AREA

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

Source: Appendix C

Direct Project Impacts

Direct impacts from project implementation would include temporary impacts and permanent impacts. Direct temporary impacts are those that would be caused by construction activity, but vegetation/habitat would be re-established in place following completion of construction. Direct permanent impacts are those where the ground disturbance would be permanent; the biological resources would be replaced by the proposed project.

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

Switchback Ramp and Curvilinear Ramp Options

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

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

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

Linear Ramp Option

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

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

Padre Dam Easement Construction Access

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

Table 3
SUMMARY OF PROJECT IMPACTS – SENSITIVE VEGETATION COMMUNITIES (acres)[1]

Vegetation Community	Impact Acreages							
	Project + Switchback Ramp Option		Project + Curvilinear Ramp Option		Project + Linear Ramp Option		Padre Dam Easement Construction Access	
	T	P	T	P	T	P	T	P
Southern Riparian Forest (including disturbed and burned)	2.08	0.50	2.08	0.50	2.08	0.50	0	-
Southern Willow Scrub	0.44	0.04	0.44	0.04	0.44	0.04	0.01	-
Mule Fat Scrub	0.03	<0.01	0.03	<0.01	0.03	<0.01	0.06	-
Freshwater Marsh	0.04	<0.01	0.04	<0.01	0.04	<0.01	0	-
Disturbed Wetland	0	0	0	0	0	0	0	-
Open Water	0	0	0	0	0	0	0	-
Diegan Coastal Sage Scrub – disturbed	0	0	0	0	0	0	0	-
Flat-topped Buckwheat Scrub	0.13	0.03	0.13	0.03	0.01	0.15	0	-
Broom Baccharis - dominated Sage Scrub	0.01	0	0.01	0	0.04	0.02	0	-
Non-native Grassland	0.05	0.01	0.05	0.01	0.05	0.01	0	-
TOTAL	**2.78**	**0.59**	**2.78**	**0.59**	**2.69**	**0.73**	**0.07**	**-**

Source: Appendix C
[1] Rounded to the nearest 0.01; thus, totals reflect rounding
T = temporary impacts: P = permanent impacts

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

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

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

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

BIO-5 Direct temporary impacts to flat-topped buckwheat scrub and broom baccharis-dominated sage scrub would be mitigated on site at a 1:1 ratio through one or more of the following as determined through resource agency consultation: restoration, enhancement, or preservation. Temporarily impacted areas would be revegetated with a Diegan coastal sage scrub plant palette. Mitigation for direct permanent impacts to flat-topped buckwheat scrub and broom baccharis-dominated sage scrub would occur at a 1:1 ratio through one or more of the following as determined through resource agency consultation: on- and/or off-site restoration, enhancement, preservation, or purchase of credits at an approved mitigation bank.

BIO-6 Whenever feasible, native vegetation shall be trimmed to the ground surface rather than uprooted.

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

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

Source: Appendix C

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

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

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

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

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

Source: Appendix C
[1]Rounded to the nearest hundredth acre; totals reflect rounding.
[2] No mitigation for temporary impacts to non-native grassland would be required, as all areas of non-native grassland that would be temporarily impacted by the proposed project would be revegetated with a native grassland and forb palette as an erosion control measure.
[3] Permanent impacts to 0.01 acre of non-native grassland are considered de minimis and mitigation is not proposed.

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

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

Source: Appendix C
[1]Rounded to the nearest hundredth acre; totals reflect rounding.

Indirect Project Impacts

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

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

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

BIO-7 The project landscape/erosion control plans shall not include invasive species (as listed in the California Invasive Plant Council (Cal-IPC) Invasive Plant Inventory [Cal-IPC 2006, or as updated]. ~~The project landscape/erosion control plans shall not include invasive species (as listed in the Cal-IPC).~~ Native plant species shall be used in all revegetation and landscaping areas outside of the existing golf course. Native or non-invasive ornamental plant species shall be used for landscaping and revegetation within the existing golf course.

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

BIO-9 Sensitive vegetation communities, jurisdictional waters and wetlands, and other sensitive biological resources located outside of permanent and temporary impact areas shall be identified on the final construction plans as "environmentally sensitive areas" and protected with temporary fencing (e.g., orange snow fence). A qualified biologist shall monitor the installation of the temporary fencing and ensure it is

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

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

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

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

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

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

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

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

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

Table 7
SUMMARY OF PROJECT IMPACTS – POTENTIAL JURISDICTIONAL AREAS
(acres)[1]

Vegetation Community	Impact Acreages							
	Project + Switchback Ramp Option		Project + Curvilinear Ramp Option		Project + Linear Ramp Option		Padre Dam Easement Construction Access	
	T	P	T	P	T	P	T	P
USACE Jurisdictional Areas								
Wetland Waters of the U.S.								
Southern Riparian Scrub (including disturbed and burned)	0.12	0.01	0.12	0.01	0.12	0.01	0	-
Southern Willow Scrub	0.01	0.01	0.01	0.01	0.01	0.01	0	-
Freshwater Marsh	0.04	<0.01	0.04	<0.01	0.04	<0.01	0	-
Subtotal	**0.17**	**0.02**	**0.17**	**0.02**	**0.17**	**0.02**	**0**	
Non-wetland Waters of the U.S.								
Ephemeral Stream	0.01	<0.01	0.01	<0.01	0.01	<0.01	0	-
Subtotal	**0.01**	**<0.01**	**0.01**	**<0.01**	**0.01**	**<0.01**	**0**	**-**
TOTAL USACE	**0.18**	**0.03**	**0.18**	**0.03**	**0.18**	**0.03**	**0**	**-**
CDFW Jurisdictional Areas								
Riparian/Wetland Habitat								
Southern Riparian Scrub (including disturbed and burned)	2.08	0.50	2.08	0.50	2.08	0.50	0	-
Southern Willow Scrub	0.44	0.04	0.44	0.04	0.44	0.04	0.01	-
Mule Fat Scrub	0.03	<0.01	0.03	<0.01	0.03	<0.01	0.06	-
Freshwater Marsh	0.04	<0.01	0.04	<0.01	0.04	<0.01		-
Subtotal	**2.59**	**0.55**	**2.59**	**0.55**	**2.59**	**0.55**	**0.07**	**-**
Stream Channel/Unvegetated Habitat								
Streambed	<0.01	<0.01	<0.01	<0.01	<0.01	<0.01	0	
Subtotal	**<0.01**	**<0.01**	**<0.01**	**<0.01**	**<0.01**	**<0.01**	**0**	
TOTAL CDFW	**2.59**	**0.55**	**2.59**	**0.55**	**2.59**	**0.55**	**0.07**	**-**

Source: Appendix C
[1] Rounded to the nearest 0.01; thus, totals reflect rounding
T = temporary impacts: P = permanent impacts

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

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

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

Table 8
PROPOSED MITIGATION REQUIREMENTS FOR IMPACTS TO POTENTIAL USACE JURISDICTIONAL AREAS

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

Source: Appendix C
[1]Rounded to the nearest hundredth acre; totals reflect rounding.

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

Vegetation Community	Impact Acreage[1]	Mitigation Ratio	Proposed Mitigation[1]
Temporary Impacts			
Riparian/Wetland Habitat			
Southern Riparian Forest	2.08	1:1	2.08
Southern Willow Scrub	0.44	1:1	0.44
Mule Fat Scrub	0.03	1:1	0.03
Freshwater Marsh	0.04	1:1	0.04
Subtotal	**2.59**	**--**	**2.59**
Stream Channel/Unvegetated Habitat			
Streambed	<0.01	1:1	<0.01
Subtotal	**<0.01**	**--**	**<0.01**
Total Temporary	**2.59**	**--**	**2.59**
Permanent Impacts			
Riparian/Wetland Habitat			
Southern Riparian Forest	0.50	3:1	1.50
Southern Willow Scrub	0.04	3:1	0.12
Mule Fat Scrub	<0.01	2:1	0.01
Freshwater Marsh	<0.01	3:1	0.01
Subtotal	**0.55**	**--**	**1.64**
Stream Channel/Unvegetated Habitat			
Streambed	<0.01	--	<0.01
Subtotal	**<0.01**	--	**<0.01**
Total Permanent	**0.55**	**--**	**1.65**

Source: Appendix C
[1]Rounded to the nearest hundredth acre; totals reflect rounding.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

City of San Diego MSCP Subarea Plan

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

- *General Planning Policies and Design Guidelines; Fencing, Lighting, and Signage 1* calls for fencing or other barriers to be used where it is determined to be the best method to achieve conservation goals and adjacent to land uses incompatible with the MHPA. This guideline specifically mentions split-rail fencing to direct public access to appropriate locations. Consistent with this guideline, the project proposes to install split-rail fencing along the project alignment to clearly define the boundaries of the bike path and direct users to remain within them.

- *General Planning Policies and Design Guidelines; Fencing, Lighting, and Signage 2* requires lighting to be designed to avoid intrusion into the MHPA and effects on wildlife, and lighting in areas of wildlife crossings to be of low sodium or similar lighting. It also limits signage to access and litter control and educational purposes. Consistent with these guidelines, project lighting would be shielded and directed towards the bike path and away from the San Diego River to avoid spillover onto the adjacent sensitive riparian habitat. Furthermore, proposed signage would consist of way-finding signage at the project's access points; the existing interpretive signage along the existing trail within Mast Park West would not be affected and would remain in place.

- *General Management Directives; Public Access, Trails, and Recreation 1* calls for barriers such as fencing to protect sensitive areas. As discussed above and consistent with this guideline, the project proposes to install split-rail fencing along the project alignment to clearly define the boundaries of the bike path and direct users to remain within them to protect adjacent sensitive habitat.

- *General Management Directives; Public Access, Trails, and Recreation 2* recommends locating trails along the edges of urban land uses adjacent to the MHPA and following existing dirt roads as much as possible rather than entering into habitat or wildlife movement areas. Consistent with this guideline, the project alignment would occur along an existing DG trail within Mast Park West and along and adjacent to an existing developed golf course. The project has been designed to minimize encroachments into sensitive habitat of the adjacent San Diego River corridor to the south (refer to Section 7.4[b]).

- *General Management Directives; Public Access, Trails, and Recreation 3* recommends to in general, avoid paving trails unless management and monitoring evidence shows otherwise, clearly demarcate trails, and undertake measures to counter the effects of erosion. The project proposes to pave the bike path with a 10-foot-wide all-weather surface and 2-foot-wide pervious shoulders to provide a Class I multi-use bike path, as well as a durable long-term facility to protect against further erosion of the existing berm while minimizing environmental effects. An all-weather surface is essential to ensure the bike path can fulfill its transportation function for all users under most all weather conditions. This is especially important for people on bikes who ride a wide variety of bicycle types, including those with tires requiring a paved surface. A paved surface also prevents erosion, reducing the need for maintenance activity that would disrupt operation of the facility. A paved bike path in this location, where an existing informal dirt trail occurs, would not adversely affect the functions and values of the biological resources within the MHPA. For example, protected species observed within this area of the MHPA, such as least Bell's vireo within the adjacent San Diego River corridor, would not be directly affected by the proposed project and the introduction of a paved bike path would not threaten the viability of this species. As discussed in Section 7.4(a), mitigation is proposed to protect sensitive species observed within the project area during vegetation clearing and grading, as well from construction noise during the avian breeding season (mitigation measures BIO-1 and BIO-3). Mitigation is also proposed for impacts to USFWS-designated critical habitat for least Bell's vireo and riparian habitat suitable for sensitive species breeding and/or roosting (mitigation measures BIO-2, BIO-4, and BIO-11). The existing berm would be improved by expanding, rebuilding, and/or reinforcing areas necessary to support the proposed bike path, and slope protection or similar measures to control erosion would be installed at locations where erosion is evident. As previously stated, the project proposes to install split-rail fencing along the project alignment to clearly define the boundaries of the bike path and direct users to remain within them to protect adjacent sensitive habitat. Thus, the proposed project would not conflict with this management directive.

- *General Management Directives; Public Access, Trails, and Recreation 4* calls to minimize trail widths to reduce impacts to critical resources and recommends a width of

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

City of San Diego MHPA Land Use Adjacency Guidelines

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

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

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

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

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

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

Conclusion

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

7.5 Cultural Resources

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

7.6 Geology and Soils

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

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

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

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

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

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

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

(ii) Strong seismic ground shaking?

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

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

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

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

(iv) Landslides?

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

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

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

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

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

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

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

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

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

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

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

7.7 Greenhouse Gas Emissions

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

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

Less Than Significant Impact. The project entails a bike path, which does not generate substantial amounts of greenhouse gas (GHG) emissions. A minimal amount of GHG emissions

would occur during project construction associated with activities such as off-road diesel equipment exhaust, and from worker and truck trips to and from the project site. Such emissions would be temporary and would not be substantial such that they would contribute to a significant impact on the environment. The project could also result in operational GHG emissions associated with production of energy consumed by the lighting that may be installed along the bike path and the operation of maintenance vehicles. These emissions, however, would be negligible as the lighting for this project would be minimal and maintenance activities would be infrequent.

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

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

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

7.8 Hazards and Hazardous Materials

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

7.9 Hydrology and Water Quality

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The ~~increase in impervious area associated with the paved bike path~~proposed project (including the reinforced and expanded berm, all grading [including the proposed 10,000 cubic yards of net fill], and retaining walls) would increase the 100-year on-site storm flow within the localized basins within the golf course by approximately 4.74 cubic feet per second (cfs) and by approximately 0.38 cfs east of the golf course. This change is considered a negligible increase compared to the overall FEMA flowrate for the San Diego River ~~rate~~ of approximately 38,000 cfs and would not adversely affect the project area or downstream areas associated with substantial erosion, siltation, and/or flooding. Runoff from smaller storms would infiltrate into adjacent vegetated areas on the north side of the berm and would not have a direct connection to the adjacent San Diego River flow area. Conveying flows in this direction would protect the berm from potential erosion due to project-generated flows. The localized basins are within the San Diego River Floodplain fringe, and flows within the floodplain would be higher than the berm in large storm events such that the basin would become part of the San Diego River flow. As the proposed project would be in an inundated area under these conditions, there would be no peak flow increase generated by the project. In addition, the project would comply with applicable storm water regulations and would be required to prepare a SWPPP that would further reduce the potential for substantial erosion and siltation during construction and project operation, as discussed in Section 7.9(a). Therefore, the proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner in a manner which would result in substantial erosion, siltation, or flooding on or off site. This impact is less than significant.

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

Less Than Significant Impact. As discussed under Sections 7.9(c) and 7.9(d), the ~~addition of impervious areas~~proposed project (including the reinforced and expanded berm, all grading [including the proposed 10,000 cubic yards of net fill], and retaining walls) would increase the on-site 100-year storm flows by approximately 4.74 cfs within the golf course and approximately 0.38 cfs just east of the golf course, but existing and proposed drainage facilities would accommodate the net increase in runoff generated by the project. Proposed drainage facilities would include improvements to approximately three low-flow drainage crossings and construct a drainage ford in the eastern portion of the project site within Mast Park West. The low-flow crossings at localized low points would be reconstructed with a concrete surface with

surrounding rip-rap to avoid undermining the bike path and for erosion prevention. The drainage ford would cross an existing earthen channel along Carlton Hills Boulevard and would include a natural bottom to convey flows during smaller storm events to the earthen channel. It would also allow for larger storm events to surface flow across the bike path. At the western end of the project alignment, a brow ditch would be constructed along the ramp that would connect to West Hills Parkway (under all of the West Hills Parkway ramp options). The brow ditch would convey surface flows from the bike path at top of the ramp, into a culvert under the proposed stairwell, and into the riparian areas on the south side of the bike path. Along the berm, which would be widened and reinforced in certain areas to support the bike path and protect it from potential erosion, drainage would surface flow across the bike path towards the golf course. This engineered drainage pattern for the project within the golf course would further prevent erosion of the berm since runoff would be directed away from the berm and away from the San Diego River. As discussed in Section 7.9(a), implementation of the BMP types identified in the Water Quality Analysis (Appendix I) would ensure that the proposed project would not create adverse water quality impacts related to the discharge of pollutants into the San Diego River (Upper) Basin and downstream receiving waters. Thus, the proposed project would not create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff. This impact is less than significant.

f. Would the project otherwise substantially degrade water quality?

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

g. Would the project place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?

h. Would the project place within a 100-year flood hazard area, structures which would impede or redirect flood flows?

g-h. Less Than Significant Impact. The project alignment is located within the AE Zone of 100-year floodway of the San Diego River. The AE Zone is subject to inundation by the one-percent annual chance flood and has base flood elevations determined. ~~However,~~ T~~t~~he proposed project does not involve housing. ~~or any other~~Proposed structures include retaining walls at select locations along the north side of bike path within the golf course, a bridge or similar structure to cross Sycamore Creek near the west end of the project alignment, and the reinforced and expanded berm within the golf course. These structures would not impede or redirect existing flood flows. As discussed in Section 7.9(c-d), the project would increase the 100-year on-site storm flow within the localized basins within the golf course by approximately 4.74 cubic cfs and by approximately 0.38 cfs east of the golf course. This change is considered a negligible increase compared to the overall FEMA flowrate for the San Diego River of approximately 38,000 cfs and would not adversely affect the project area

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

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

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

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

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

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

7.10 Land Use and Planning

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

a. Would the project physically divide an established community?

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

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

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

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

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

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

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

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

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

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

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

7.11 Mineral Resources

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

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

b. Would the project result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

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

7.12 Noise

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

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

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

Construction Noise

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

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

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

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

Project Operations

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

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

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

Conclusion

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

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

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

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

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

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

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

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

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

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

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

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

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

7.13 Population and Housing

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

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

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

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

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

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

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

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

7.14 Public Services

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

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

Fire and Police Protection

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

Schools

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

Parks

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

Other Public Facilities

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

7.15 Recreation

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

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

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

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

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

7.16 Transportation/Traffic

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

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

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

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

The extent of modifications to West Hills Parkway would depend on the West Hills Parkway ramp option ultimately constructed, but no acquisition of private property would be required under any of the options. Under the Switchback Ramp Option, a proposed traffic signal and a continental crosswalk would be installed along West Hills Parkway where the ramp would connect to the existing sidewalk. Under the Curvilinear Ramp Option, the following roadway modifications would occur:

- Construction of a 15-foot-wide sidewalk to replace the existing five-foot-wide sidewalk on the east side of the roadway between where the ramp would connect to the existing sidewalk and the southeast corner of the West Hills Parkway/Carlton Oaks Drive intersection,

- Installation of a new guard rail along the proposed widened sidewalk,

- Installation of chain-link fencing along a portion of the east side of the widened sidewalk,

- Installation of curb ramps at each corner of the West Hills Parkway/Carlton Oaks Drive intersection,

- Installation of continental crosswalks at the southern, eastern, and northern approaches to West Hills Parkway/Carlton Oaks Drive intersection to channel people to the existing Class II bike route along the western side of West Hills Parkway,

- Relocation of the existing traffic signal at the southeast corner of the West Hills Parkway/Carlton Oaks Drive intersection, and

- Re-striping of portions of the roadway to accommodate the proposed roadway improvements.

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

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

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

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

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

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

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

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

e. Would the project result in inadequate emergency access?

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

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

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

7.17 Utilities and Service Systems

Environmental Issue	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the proposed project:				
a. Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	□	□	□	■
b. Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	□	□	■	□
c. Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	□	■	□	□
d. Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	□	□	■	□
e. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	□	□	□	■
f. Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	□	□	■	□
g. Comply with federal, state, and local statutes and regulations related to solid waste?	□	□	□	■

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

7.18 Mandatory Findings of Significance

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

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

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

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

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

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

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

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

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

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

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

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