Chapter 5 contains an analysis of the potential environmental impacts that may occur through implementation of the proposed project, including anticipated future maintenance. The environmental resource areas addressed in the following sections include those identified as potentially significant by the lead agency through preliminary review and in response to the NOP. In accordance with Appendix G of the CEQA Guidelines and the City of San Diego’s CEQA Guidelines, 15 environmental issues are addressed in the following sections. Each issue analysis includes a summary of existing conditions, including an overview of the regulatory context; thresholds for the determination of impact significance; an evaluation of potential proposed project impacts; and the provision of mitigation measures if applicable, including the resulting overall impact conclusion. Impact thresholds were based on City EIR Guidelines but were occasionally tailored by the lead agency to reflect the unique nature of the project or specific uses/conditions within the project area.

5.1 LAND USE AND RECREATION

This section describes existing environmental conditions related to land use and recreation in the area surrounding San Dieguito Lagoon, including the W-19 restoration site, disposal site, and maintenance placement sites. This section also identifies pertinent policies and regulations governing land use and recreation activities in the designated project areas and evaluates the impacts associated with implementation of the proposed project.

5.1.1 EXISTING CONDITIONS

The relevant policies and regulations guiding land use and recreational uses at the project site are discussed within this section. Additional regulatory requirements pertaining to other specific topic areas, such as noise, air quality, water quality, etc., are discussed in their respective analysis sections.

Regulatory Setting

A full description of the regulatory setting for land use and recreation can be found in Appendix E. The following land use laws, regulations, policies, and plans are applicable to the W-19 and disposal sites and are briefly described below.

- Park Master Plan for the Coastal Area of the San Dieguito River Valley Regional Open Space Park (Park Master Plan)
- San Dieguito River Park Concept Plan (Concept Plan)
- City of San Diego General Plan
- North City Future Urbanizing Area Framework Plan (Framework Plan)
- Carmel Valley Community Plan
- California Coastal Act
- City of San Diego Zoning Code
- City of San Diego Environmentally Sensitive Lands (ESL) Regulations
5.1 Land Use and Recreation

- City of San Diego Land Development Manual and Biology Guidelines
- City of San Diego Land Development Code (LDC) Historical Resources Regulations and Land Development Manual (LDM) Historical Resources Guidelines
- City of San Diego Multiple Species Conservation Program (MSCP) Subarea Plan and Multiple Habitat Planning Area (MHPA)
- City of Del Mar Community Plan
- City of Del Mar Local Coastal Program (LCP)
- California Department of Fish and Wildlife’s San Dieguito Lagoon State Marine Conservation Area (SMCA)
- North Coast Corridor Public Works Plan/Transportation and Resource Enhancement Program (PWP/TREP) and the Resource, Enhancement, and Mitigation Program (REMP)

Park Master Plan for the Coastal Area of the San Dieguito River Valley Regional Open Space Park (Park Master Plan)

The Park Master Plan provides a framework for implementing community goals for the restoration of the San Dieguito Lagoon ecosystem, both tidal and nontidal, and for the provision of public access trails and amenities for public enjoyment and nature study. Major applicable objectives include the following: restore a total, well-functioning ecological unit; expand tidal influence; restore native habitats; establish and enhance habitat for sensitive species; provide CTC Trail access for multiple user groups; and provide resource interpretation.

The Park Master Plan provides specifications for habitat restoration design, including specific locations and acreages for various habitat types. Major components of restoration design detailed in the Park Master Plan include excavation to restore tidal habitat, maintaining an open tidal inlet, river berms, providing appropriate habitat types, enhancing sensitive habitat areas, and tailoring the elevation of design of habitat areas to accommodate threatened and endangered species.

The Park Master Plan describes the provision of public access to the W-19 area through a trail network. Chapter 7 of the existing Park Master Plan describes that the limited trails proposed are intended to provide a well-defined, thoughtfully planned system of pedestrian/bicycle/equestrian trails mostly located along the edges to help ensure the success of the SCE restoration project, as well as the non-tidal habitat areas of the project area that are impacted by the informal and uncontrolled dirt trail network that crisscrosses the area. Most of the trails described in the Park Master Plan have been constructed since the time the plan was prepared and adopted (2000), such as the CTC Trail. The trail, originally referenced as the Mesa Loop Trail, has been developed and is now named the Dust Devil Nature Trail.

Some of the most applicable guidelines include:

- Provide public access for hikers, bicyclists, equestrians, and users of all abilities.
- Provide opportunities for nature study and education.
- Provide connections to existing and proposed local and regional trail networks.
- Provide fencing alongside the trail where appropriate.
- Align trails to take advantage of interpretive opportunities.
San Dieguito River Park Concept Plan (Concept Plan)

The JPA’s Concept Plan (San Dieguito River Park JPA 2002) was prepared to formally establish the vision and goals for the future use of the San Dieguito river valley. Portions of the plan apply to San Dieguito Lagoon and the project site. Within the plan, the W-19 project site and disposal site are located in Landscape Unit A, Del Mar Coastal Lagoon.

The Concept Plan specifically states that it endorses the restoration of San Dieguito Lagoon and its associated wetlands ecosystem, including enlargement of the existing tidal basin; creation of a variety of coastal wetland habitats; and restoration of associated upland habitat in order to create a functional, ecological, and hydrological unit that will provide for tidal flushing, open water, wetlands, and grassland and other upland habitat. The Concept Plan also includes policies for the Del Mar Coastal Lagoon Landscape unit related to maintaining views and compatibility of uses with the open space character of the lagoon. A Park Proposal in the Concept Plan includes implementation of a lagoon enhancement and restoration program for San Dieguito Lagoon both east and west of I-5 and also states that the San Dieguito Lagoon and wetlands ecosystem shall be enlarged and restored east and west of I-5 to a total well-functioning ecological and hydrological unit including adequate tidal flushing, open waters, wetlands, uplands, and bluffs.

City of San Diego General Plan

The City’s General Plan (City of San Diego 2008) provides a general foundation for land use decisions and policy framework for how the City should grow. Together, the General Plan and the NCFUA Framework Plan described below, seek to guide future growth and development to achieve citywide and community level goals.

Policies most applicable to the project are generally found with the Land Use and Community Planning Element, which designates the W-19 project site as Open Space within Parks, Open Space. The City’s General Plan designates the disposal site as Open Space, Parks, and Recreation. This designation identifies areas for preservation of land that has distinctive scenic, natural, or cultural features; that contributes to community character and form; or that contains environmentally sensitive resources. The Recreation Element prescribes goals and policies specific to park and open space lands and the preservation of such resources and implementation of recreational facilities such as trails. The Conservation Element contains a wide variety of policies aimed at protecting natural resources such as wetlands, coastal areas, floodplains, and other ecological resources.

North City Future Urbanizing Area Framework Plan (Framework Plan)

The project site is within Subarea II of the Framework Plan and is designated as Environmental Tier. Within this designation, activities and development within the site are guided primarily by Open Space Guiding Principles. The principles generally call for an interconnected viable system of natural open spaces, the conservation of biological diversity and open space features protected from detrimental human activities, and incorporation of low-impact recreation. The Framework Plan also includes three management zones for Environmental Tier Lands: Habitat Protection Areas, Biological Buffer Areas, and Transition Areas. Each zone includes implementing principles.
and allowed and prohibited uses. The majority of Environmental Tier Lands are generally within Habitat Protection Areas, which provide the most restrictive uses and prohibit most structures and recreation. The Biological Buffer Areas allow for more interaction and recreation use while providing distance between sensitive habitat and human development/activity. The Framework Plan also indicates the W-19 site is an area of High Scenic Value.

The disposal site is on land owned by the City of San Diego and is located within the southern portion of the NCFUA, Subarea II and is identified as Additional Sensitive Lands. Within this designation, activities and development within the site are guided primarily by Open Space Guiding Principles.

Carmel Valley Community Plan

The Carmel Valley community is located adjacent to the south of the NCFUA II, and a very southeastern tip of the disposal site extends into the Carmel Valley community boundaries. The Land Use Plan Map for the Camel Valley Neighborhoods (City of San Diego 2014b) designates the hillsides at the southern end of the disposal site as Natural Open Space.

California Coastal Act

The project site is within the Coastal Zone as designated by the CCC. The CCC has coastal permit jurisdiction over the W-19 site. Various Coastal Zone designations apply across the project site. The eastern portion of the project site is not formally mapped, while the western portion is retained under CCC permit jurisdictional authority. A small southern segment of the project site is located within the Local Coastal Program Deferred Certification area (jurisdiction is retained by the CCC). There is a buffer along the San Dieguito River, which is designated as an Appeal Jurisdiction.

The disposal site is within coastal permit authority of the CCC. The disposal site is located within the Local Coastal Program Deferred Certification area, (jurisdiction remaining with the CCC).

Chapter 3 of the California Coastal Act outlines coastal resources planning and management policies, specifically addressing public access, recreation, marine environment, land resources, development, and industrial development (Articles 2–7).

City of San Diego Zoning Code

Two major zoning designations encompass the W-19 project area: Open Space – Floodplain Zone (OF 1-1), which generally buffers the San Dieguito River, and Agricultural – Residential Zone (AR 1-1), which generally encompasses the river valley (City of San Diego 2010a). Natural resource preservation and passive and active recreation are permitted within this zone.

The majority of the disposal site is located within the AR 1-1 Zone. A very small portion of the disposal site that extends into the Carmel Valley Community boundaries is within the Carmel Valley Planned District Open Space Zone (CVPD-OS).
City of San Diego Environmentally Sensitive Lands (ESL) Regulations

The City designates a variety of Environmentally Sensitive Lands (ESL) types and overlays through the General Plan, Municipal Code, and Land Development Manual. As defined in the Municipal Code Section 143.0110, ESLs include those with sensitive biological resources, steep hillsides, coastal beaches, sensitive coastal bluffs, and special flood hazard areas. ESL Regulations apply when these specially designated land resources are present.

As outlined in Appendix E, the presence of sensitive biological resources and wetlands associated with the San Dieguito River and lagoon basin qualify the project site as an ESL, which is therefore subject to the City’s ESL Regulations and may require a Site Development Permit from the City. The ESL designation means the project would be subject to the restrictions and requirements outlined in the City of San Diego Land Development Code Biology Guidelines (City of San Diego 2012). Additionally, the project site is entirely within the Federal Emergency Management Agency (FEMA) designated Special Flood Hazard Area for areas subject to inundation by the 1 percent annual chance flood, Zone A (FEMA 2012) and would be subject to additional regulations imposed on lands in special flood hazard areas.

Uses permitted in wetlands as outlined in Municipal Code Section 143.0130 include wetland restoration projects where the primary purpose is restoration of habitat. The proposed project is consistent with this permitted use. The project site is also located within the Coastal Overlay designation (Municipal Code Section 132.04). Thus, the project would be subject to development restrictions associated with the Coastal Overlay designation. The City allows an exception to the Site Development Permit requirement for a restoration project where the sole purpose is enhancement or restoration of native habitats; however, because the project site is within the coastal overlay zone, this exception does not apply. A Site Development Permit may be required as part of project processing under City jurisdiction.

City of San Diego Land Development Code (LDC) Historical Resources Regulations and Land Development Manual (LDM) Historical Resources Guidelines

The City designates guidelines to ensure consistency in the management of the City’s historical resources, including identification, evaluation, preservation/mitigation, and development. Guidelines implement the City’s Historical Resources Regulations, which are contained in the Land Development Code (Chapter 14, Division 3, Article 2). Regulations are in compliance with the City’s Progress Guide and General Plan, CEQA, and Section 106 of the National Historic Preservation Act of 1966 (City of San Diego 1999). Restoration, maintenance, and monitoring plans for the proposed project would be prepared in accordance with the goals and guidelines of the LDC Historical Resources Regulations and LDM Historical Resources Guidelines during any subsequent discretionary review process with the City of San Diego.

City of San Diego Multiple Species Conservation Program (MSCP) Subarea Plan and Multiple Habitat Planning Area (MHPA)

The ultimate goal of the Multiple Species Conservation Program (MSCP) is to create a regional habitat preserve system designated as the Multiple Habitat Planning Area (MHPA), while
allowing development projects to occur with a streamlined development review system that avoids the traditional project-by-project review by regulatory agencies. The W-19 site is also partially located with the City’s MHPA. The western half of the site is entirely within the MHPA, while a swath through the eastern half of the site is excluded, as shown in Figure 5.1-1. The disposal site is mostly excluded from the MHPA, with a small exception in the southeastern corner (concurrent with the area within the Carmel Valley community planning area).

Restoration, maintenance, and monitoring plans for the project would be prepared in accordance with the goals and guidelines of the MSCP Subarea Plan (City of San Diego 1997), and in consultation with the wildlife agencies. The Subarea Plan addresses topics applicable to the project such as fencing, materials storage, flood control, restoration, public access, and invasive exotics control, among others.

City of Del Mar Community Plan

The Community Development section of the Community Plan designates the beach placement site as Beach & Bluffs. Objectives provided in the Community Plan include a requirement for the placement of beach-quality sand on Del Mar beaches whenever beach-quality sand results from the dredging of San Dieguito Lagoon.

City of Del Mar Local Coastal Program (LCP)

The beach placement locations are within the Coastal Zone and are within the jurisdictional boundaries of the City of Del Mar LCP. The LCP Land Use Plan designates the beach areas as Public Parkland (PP) with allowed uses, including public parks, beaches, playgrounds, and ecological preserves. The beach area north of the river inlet is within the North Bluff District and south of the inlet is within the North Beach District. The LCP Land Use Plan was certified by the CCC in 1993 and the City assumed authority of the processing of CDPs for most projects in Del Mar. The CCC retains authority of processing CDPs for projects in areas known as “original jurisdictions” or generally those lands subject to tidal action or claims of public trust (City of Del Mar 1993). The Implementing Ordinances of the LCP were certified by the CCC in 2001 (City of Del Mar 2001). Due to multiple jurisdictions overlaying the project site, a consolidated CDP may be requested from the CCC to streamline the permitting process.

California Department of Fish and Wildlife’s State Marine Conservation Area (SMCA)

Under the California Marine Life Protection Act passed in 1999, marine protected areas (MPAs) were established through efforts of the California Department of Fish and Wildlife and California State Parks agencies (California Department of Parks and Recreation 2015). San Dieguito Lagoon State Marine Conservation Area (SMCA) is one of five MPAs located in waters adjacent to Torrey Pines State Natural Reserve. The San Dieguito Lagoon SMCA is located southwest of the W-19 project, west of I-5, and south of the San Dieguito River. The W-19 site is located outside of the San Dieguito Lagoon SMCA and no project activities would occur within the San Dieguito Lagoon SMCA (CDFW 2016e). The SMCA is identified to show location and consistency with W-19 activities.
Figure 5.1-1
MHPA Boundary within Project Area

Source: JPA: Dokken 2015

Scale: 1:15,000 1 inch = 1,250 feet

Legend
- Project Area
- Onsite Disposal Option
- Temporary Haul Route
- Alternate Temporary Haul Route
- Temporary Staging Area
- Multi-Habitat Planning Area (MHPA)

San Dieguito Lagoon W-19 Restoration Project Final EIR
Path: P:\2012\0027\9999_SD_W19\GIS\6.3_Layer\Reports\EIR\MHPA.mxd 9/25/2013 paul.moreno
The proposed project would be considered mitigation for transportation improvements identified in the North Coast Corridor PWP/TREP. The REMP would serve as a guideline for determining what performance standards would be utilized for the proposed project’s monitoring plan. Further detail regarding performance standards would be developed during the permitting processes. The following are examples of performance standards that would be developed and quantified: topography, water quality, tidal prism, habitat areas, reproductive success, food chain support, and exotics (Caltrans 2016a).

**Land Ownership**

**W-19 Site**

The W-19 site is located within the City of San Diego jurisdiction and is primarily owned by the JPA, while CDFW and 22nd District Agricultural Association each own a parcel in the northern area. The westernmost parcels are currently owned by the City of San Diego, who has an agreement to sell the land to SANDAG once the W-19 site has received all necessary federal and state permits. SANDAG will transfer the property to the JPA after the site meets its success criteria. The project site and land ownership within the lagoon are shown in Figure 2-3.

**Disposal Site**

The City of San Diego owns the disposal site, while temporary offroad haul routes used to transport materials from the restoration site to the disposal site would traverse lands owned by the JPA and the City of San Diego (see Figure 2-3).

**Material Placement Sites**

The two beach placement sites proposed for material placement during maintenance activities are located within the jurisdictional boundaries of the City of Del Mar.

**Land Uses**

**W-19 Site**

Various land uses surround the W-19 site. The northwestern portion of the site is adjacent to the San Dieguito River and open and vegetated areas of the lagoon, including the area restored by SCE’s restoration project. Farther north is Via de la Valle and commercial and residential developments along the roadway. The Del Mar Horse Park is located immediately north of the northeastern portion of the project site and hosts a range of equine-related activities. The CTC Trail alignment traverses west to east along the northern side of the San Dieguito River. El Camino Real serves as the eastern border of the project site. Areas immediately east of El Camino Real include the City-owned properties of Polo Fields and Fairbanks Ranch Golf Course, undeveloped private parcels, and some residential and religious facility uses. The
southern boundary of the W-19 site generally follows an existing maintenance/access road and is adjacent to open and vegetated areas of the lagoon complex. The Dust Devil Nature Trail and associated trailhead/parking area exists south of the W-19 site. The project site narrows in the westernmost portion and has only a small western boundary along the San Dieguito River. Slightly farther west is I-5 and the developed areas associated with the Del Mar Fairgrounds along Jimmy Durante Boulevard west of the freeway.

The 141-acre W-19 site is located adjacent to the San Dieguito River and within areas that were historically part of the larger wetland system within San Dieguito Lagoon but, until fairly recently, had been farmed. The W-19 site is currently vacant and generally undeveloped. The site is bisected by an SDG&E utility corridor that crosses the site in a northwest/southeast alignment. The majority of the utilities present on the W-19 site are consolidated within the 150-foot-wide utility corridor, including above-ground electrical transmission lines, cable fiber-optic lines and poles and below-grade gasoline/oil pipelines, and a natural gas pipeline (see Section 5.13 for utility details). A separate set of utility poles traverse the site farther west. Existing unpaved maintenance/access routes associated with the utility corridor, as well as haul routes associated with the SCE restoration project, also traverse portions of the W-19 site.

Disposal Site

The disposal site and surroundings are undeveloped vegetated open space lands. To the north, the Dust Devil Nature Trail is within approximately 450 feet of the disposal site. Existing maintenance/access roads are located throughout the area and partially serve as the disposal site boundaries to the east and south, but do not cross the disposal site itself. El Camino Real is approximately 500 feet east of the disposal site, with residential development located east of the road. South of the disposal site, steep hillsides lead up to residential developments at the top of the bluffs. The hillsides are generally vegetated with some exposed areas related to steep slopes, runoff channels, or informal paths that lead down toward the San Dieguito River Park.

The disposal site consists of two distinct land uses. The northwestern portion is the disposal site used for the SCE restoration project (DS-36) and consists of unvegetated, slightly elevated, graded and terraced fill material. The southeastern portion of the disposal site is generally undisturbed vegetated terrain. Some small, informal trails have been created in this general area but are not a formal trail network.

Material Placement Sites

The material placement sites on the beaches in Del Mar are currently used for beach recreation. The placement sites are tidally influenced and conditions change daily with the tides and seasonally with varying widths and volumes of sand on the beaches. Thus, no permanent development is located on the sandy beach areas.
**Existing Recreational Uses and Facilities**

**San Dieguito River Park**

The San Dieguito River Park CTC Trail is a regional trail planned to extend 71 miles from the ocean to the San Dieguito River’s source on Volcan Mountain. Currently, 45 miles of the trail have been opened. Within San Dieguito Lagoon, the CTC Trail is 2.4 miles long and currently begins on the west side of I-5 and continues from Jimmy Durante Boulevard to the Boardwalk to the east, then under the freeway and along the north side of the San Dieguito River. Figure 3-2 shows the trail network. In the project area, the CTC Trail currently has an eastern terminus at El Camino Real. After the El Camino Real terminus, the CTC Trail does not resume until Santa Fe Valley, approximately 4.5 miles to the northeast. The majority of the CTC Trail within the lagoon area is surfaced with DG and includes a split-rail fence along the sides. The CTC Trail allows nonmotorized use by pedestrians, bicyclists, and equestrians. Based on trail counts taken over the past 3 years, the CTC Trail in the project area experiences approximately 72,400 users annually, or almost 200 users per day. In 2015, the trail users were approximately 83 percent hikers, 16 percent bicyclists, and 1 percent equestrians (Anderson, personal communication, 2016).

The Salt Marsh Bird View Trail is a short secondary trail that connects to the CTC Trail and provides a slightly more southerly pedestrian-only access closer to the lagoon. The Birdwing Open Air Classroom along the CTC Trail provides a shaded facility for San Dieguito River Park educational programs, public events, and a place where visitors and trail users can sit and view the lagoon. Special activities are hosted at the Birdwing Open Air Classroom approximately two to three times per month, including San Dieguito River Valley Conservancy monthly yoga sessions and Watershed Explorers Program activities.

The Dust Devil Nature Trail is a multi-loop trail located in the southeastern portion of the lagoon, entirely south of the river, and is approximately 1.7 miles in length. The Dust Devil Nature Trail is a pedestrian-only trail; biking and equestrian use are not permitted. Based on counts and estimations from JPA Park Rangers, the Dust Devil Nature Trail is assumed to have an average of approximately 28,000 users per year from 2011–2015 (Ward, personal communication, 2015). Trail users range from individual hikers, participants in ranger-led hikes, families, and other groups such as high school cross country teams. Many trail users are local and walk to the trail access point from their residences.

Ranger-led hikes are held monthly, alternating between the CTC Trail and Dust Devil Nature Trail. Regular bird walks are also scheduled along the CTC Trail. Additionally, monthly bird counts occur on the trails in the lagoon network.

Two trailhead parking lots currently provide parking for the lagoon trails. One parking lot is located off of El Camino Real on the east side of the lagoon and provides access to the Dust Devil Nature Trail. This gravel lot is permitted for 25 vehicles and generally experiences light use. A second parking area and street parking are located off of San Andres Drive along the north side of the lagoon that provides access to the CTC Trail. Approximately 60 vehicular spaces are accommodated in the parking lot. Each parking lot provides informational signage at the trail access regarding the trail and permitted uses.
Throughout the lagoon and surrounding area are informal trails and paths that are not part of the 
official San Dieguito River Park trail network. Use of these informal paths has been greatly 
reduced in recent years as formal trails are now available and public access is not allowed 
outside of the trail network. City of San Diego trails associated with the Carmel Valley Open 
Space area are located along the perimeter of the bluff tops south of the disposal site. Informal 
paths have been forged over time from the bluff tops down to the river valley. Many equestrian 
uses occur in the project area, including along the CTC Trail, at the Horse Park located north of 
the San Dieguito River, at the Polo Fields east of El Camino Real, and along trails near San 
Dieguito Road east of El Camino Real as part of the Gonzales Canyon Open Space trail network.

**Material Placement Sites**

Stretches of Del Mar Beach, located immediately to the north and south of the inlet, would be 
used for material placement during W-19 wetlands maintenance. These beach placement sites are 
shown in Figure 3-10 and are the same as those designated for beach placement during inlet 
maintenance of the SCE restoration project. These beach areas are used for common beach 
recreation activities, such as sunbathing, walking/jogging, water and sand play, and swimming, 
among others. Beach conditions can vary from sandy to exposed cobbles and rocky terrain. The 
area north of the inlet is North Beach area, commonly known as Dog Beach, and is a popular 
location for dog owners to bring their canines. Other uses like volleyball are also popular.

### 5.1.2 IMPACT THRESHOLDS

A significant impact would occur if implementation of the proposed project would:

A. Require a deviation or variance from a regulatory agency and the deviation or variance 
would in turn result in a physical impact on the environment;

B. Result in a conflict with the environmental goals, objectives and recommendations of the 
community plan in which it is located;

C. Conflict with the provisions of the City’s Multiple Species Conservation Program 
Subarea Plan or other approved local, regional or state habitat conservation plan;

D. Physically divide an established community; or

E. Result in temporary or permanent and critical loss of recreational use areas or conflicts 
with recreational uses.

The CEQA impact thresholds for land use and recreation are those recommended by the City of 
San Diego Development Services Department as well as thresholds used in other recent lagoon 
restoration project EIRs. Recreation is also addressed specifically due to the unique recreation 
focus of the San Dieguito River Park and area beaches.

### 5.1.3 IMPACT ANALYSIS

The proposed project includes the adoption of an addendum to the Park Master Plan, as detailed 
in Section 3.4.1 and shown in Figure 3-2. The Park Master Plan would be amended to
redesignate the restored areas as W-19 and incorporate the updated boundaries of restoration and proposed habitat types associated with the proposed project, specify long-term maintenance activities, and describe the proposed trail alignment. The Park Master Plan addendum is specific to the scope of this project and would not modify other elements or components of the Park Master Plan not affected by the project. The following analysis considers the potential implications and environmental effects of the changes that would result from implementation of the Park Master Plan addendum, where applicable.

W-19 Restoration

Land Use

As described in Section 5.1.1, the lagoon restoration project site is located within the City’s General Plan jurisdiction and within the NCFUA. The project site is also within the Focused Planning Area for the Coastal Area of the JPA's San Dieguito River Park. As detailed in Appendix E, there is no adopted subarea plan for Subarea II in the NCFUA, and planning and land use policies for this area are contained in the Framework Plan. Thus, the project site is generally governed by the Framework Plan policies, the JPA Park Master Plan, and applicable Coastal Zone regulations. The project site is also subject to City of San Diego zoning, ESL Regulations, and MSCP requirements, as described below and detailed in Appendix E.

City of San Diego General Plan and LDC

The proposed restoration activities and new trail would be consistent with the applicable goals and policies of the General Plan and LDC Historical Resources Regulations related to the maintenance and preservation of open space lands and the protection and enhancement of sensitive ecological and natural resources. There would be no need for a variance or deviation from the policies of the General Plan or LDC and the project would not conflict with the environmental goals, objectives, and recommendations of the plan or codes. There would be no impact (Criteria A and B).

NCFUA Framework Plan

Lagoon restoration within the W-19 site would be consistent with the applicable policies, environmental goals, objectives, and recommendations of the Framework Plan for Subarea II, Environmental Tier. The resulting restoration and improved hydraulic and biological function of the lagoon and surrounding river valley would serve to implement the policies pertaining to viable natural open space and conserved biological diversity in a large natural area along with a new low-impact recreational trail. The new trail would be located along the perimeter of the restored habitat area, serving as a buffer area between the sensitive habitat and El Camino Real. Additionally, relocated electrical lines would be incorporated along the existing easement, as well as along El Camino Real, consolidating utility infrastructure traversing the site and not creating substantial new encroachments into sensitive natural open space areas. There would be no need for a variance or deviation from the policies of the Framework Plan and the project would not conflict with the environmental goals, objectives, and recommendations of the community plan. Impacts would be less than significant (Criteria A and B).
JPA Park Master Plan

The habitat restoration and wetland creation as a result of the project would serve to implement and further achieve the goals of the Park Master Plan as the project would establish a tidal connection with the San Dieguito River and provide approximately 60 acres of tidal salt marsh. Upland/transitional habitats would be established to support ecological function and promote habitat diversity, and appropriate quality habitat for sensitive species would result. Also, the proposed trail would provide new public access/recreation with opportunity for educational interpretation along the perimeter of the project area and a future connection to the CTC Trail.

Habitat Restoration

As described previously, the Park Master Plan includes restoration design, such as the restoration of tidal habitat, river berms, and habitat types with appropriate elevations. The lagoon restoration activities proposed by the project would implement many of these strategies and design elements and would be consistent with the Park Master Plan.

However, the project includes restoration in areas beyond those designated for wetland restoration activities in the Park Master Plan as shown in the proposed Park Master Plan boundary adjustment in Figure 3-2. The proposed W-19 restoration activities would be located in areas identified for restoration in the Park Master Plan (originally identified as U19, W36, M32, M33, and M37 in the Park Master Plan), as well as other areas west of El Camino Real owned by SANDAG, 22nd District Agricultural Association, and CDFW. Thus, the Park Master Plan addendum would expand the Park Master Plan boundaries to encompass the entire W-19 restoration site and would identify specific habitat designations on a revised habitat map (see Figure 3-3) that may result from the expanded area proposed for habitat restoration. Proposed habitat types included within the project (see Figure 3-3) are similar and complementary to the habitats specified in the Park Master Plan and would serve to meet the overall goals and objectives of the habitat restoration design outlined in the Park Master Plan.

The purpose of the Park Master Plan addendum (described in Section 3.4.1) is not to serve as a deviation or variance from existing policies or objectives; rather, its purpose is to provide an update to the 15-year-old plan and ensure the Park Master Plan accurately includes the current restoration proposal. The addendum focuses only on the W-19 restoration site and does not create new allowable/prohibited uses or substantially change the overall uses and restoration plans prescribed through the current Park Master Plan.

Thus, while the project may result in slight deviations from the original Park Master Plan text (i.e., differences in habitat distribution acres, specific locations, etc.) these minor variations and adjustments would not create substantial inconsistencies with overall policies and would work to achieve the goals of the plan. Additionally, the Park Master Plan addendum as proposed by the project would accurately update the Park Master Plan specific to the W-19 site and correct potential inconsistencies and discrepancies in boundaries or habitat distributions. For these reasons, implementation of lagoon restoration and the associated Park Master Plan addendum would not conflict with the environmental goals, objectives, and recommendations of applicable planning documents or result in physical impacts due to a deviation or variance, and the impact would be less than significant (Criteria A and B).
The proposed project is identified as advanced mitigation for future transportation improvements identified in the North Coast Corridor PWP/TREP. The REMP would be consulted in the development of performance standards for the monitoring plan, as necessary. As stated in the REMP, performance standards to measure and monitor the success of the restoration efforts would occur pursuant to future permitting processes. The project would not conflict with goals of the program. There would be no impact (Criteria A and B).

Public Access and Interpretation

As part of the Park Master Plan addendum, the proposed trail alignment would be included as a new recreational amenity that was not previously contained in the Park Master Plan. A segment of the proposed new trail would be similar to trail Segment 13 as shown in the existing Park Master Plan figure, Proposed Trails and Interpretative Facilities for the San Dieguito Coastal Park Master Plan, although the overall trail route is different.

While the new trail alignment was not included in the existing Park Master Plan, it is consistent with the recommendations and implementing guidelines for trails as outlined in the Park Master Plan. The trail would provide new public access for recreationalists; allow for educational and interpretative opportunities such as kiosks, signage, no-littering information, or ranger-led hikes; and provide connection to the existing trail network. The new trail would be designed according to trail standards outlined in the Park Master Plan, including a 6-foot-wide alignment along the lagoon edge with a DG surface, appropriate split-rail fencing, and uses similar to the Dust Devil Nature Trail.

Adoption of the Park Master Plan addendum, including the new trail alignment, would not substantially alter the existing plan for future trails and recreation opportunities within the JPA Master Plan area and would be consistent with the stated vision and purpose of the limited trail network. Trail plans included in the existing Park Master Plan would remain and the Park Master Plan addendum would formally add the new trail alignment as part of the plan. For these reasons, implementation of the proposed trail and the inclusion of this recreation facility as part of the Park Master Plan addendum would be consistent with existing policies and planning for recreational uses in the lagoon and would not result in significant physical impacts due to a variance or deviation from the planning document. Impacts would be less than significant (Criteria A and B).

JPA San Dieguito River Park Concept Plan

The proposed restoration activities and new trail would be compatible with the restoration and habitat creation policies of the Concept Plan and serve to implement restoration and enhancement programs as described. The Concept Plan also includes Design and Development Standards that are intended to protect sensitive natural resources, such as biological, cultural, and visual resources. The restoration activities proposed by the project have been designed to restore wetland habitats and would not include invasive species, would provide appropriate buffers, and would include long-term management of the restored areas in accordance with applicable design and development standards. The project would not include any structures or facilities that could be in conflict with the standards. The new trail has been designed along the edge of El Camino
Real to avoid impacts to sensitive resources within the interior of the restoration site and would include appropriate fencing to reduce intrusion into sensitive areas. As specified in the Design and Development Standards relative to wetland restoration and/or enhancement projects, a study of the effects of the altered flood flows as a result of the restoration project has been completed and identifies less than significant impacts as described in Section 5.2, Hydrology, of this EIR. Implementation of the project would not conflict with the Design and Development Standards of the Concept Plan. The project would not conflict with the environmental goals, objectives, and recommendations of the plan. There would be no impact (Criterion B).

**Zoning**

The OF 1-1 and AR 1-1 zones that encompass the project site permit natural resources preservation and active and passive recreation as described in the City’s Municipal Code (Sections 131.0205 and 131.0303). Thus, the habitat restoration and planned trail would be allowable per the applicable zoning regulations and no variance or deviation from the zoning designations and regulations would be required. There would be no impact (Criteria A and B).

**Environmentally Sensitive Lands**

The presence of sensitive biological resources and wetlands associated with the San Dieguito River and lagoon basin qualify the project site as ESLs, which are therefore subject to the City’s ESL Regulations and would require a Site Development Permit from the City. The project would be subject to the restrictions and requirements outlined in the City of San Diego Land Development Code Biology Guidelines (City of San Diego 2012). Regulations applicable to the project deal with a wide range of protective restrictions, such as general measures like restriction on the storage of materials or equipment in ESLs without demonstration that the disturbance would not degrade the land or cause permanent habitat loss. Regulations require consistency with the MSCP Subarea Plan and incorporation of recommendations and requirements from wildlife agency input and permitting. The ESL Regulations require the preservation of steep hillsides in their natural state to the extent possible and also provide requirements related to the alteration of rivers or streams and the modification of floodways.

Additionally, the project site is entirely within the FEMA designated Special Flood Hazard Area for areas subject to inundation by the 1 percent annual chance flood, Zone A (FEMA 2012) and would be subject to additional regulations imposed on lands in special flood hazard areas. Steep hillsides (greater than 25 percent slope) are designated in a very small location along El Camino Real at the southeastern corner of the project site but are outside the limits of grading for the project and restoration activities.

Uses permitted in wetlands as outlined in Municipal Code Section 143.0130(d) include wetland restoration projects where the primary purpose is restoration of habitat. The proposed project is consistent with this permitted use.

The project does not propose the development of structures or other permanent built features that might conflict with provisions of the ESL Regulations. The project’s habitat restoration and trail would be consistent with applicable requirements and restrictions of the ESL Regulations. The
project would enhance the biological resources within San Dieguito Lagoon and the river basin and also improve the hydraulic function within the floodplain. Elements of the project would be designed to achieve the project objectives and meet permitting requirements to obtain a Site Development Permit as issued by the City. Thus, a deviation or variance from the ESL Regulations would not be necessary for implementation of the project and the impact would be less than significant (Criteria A and B).

Coastal Zone

The CCC would need to issue a coastal development permit for the project. The permit would be issued by the CCC as they have retained jurisdiction over the project site.

Many of the policies contained in Chapter 3 of the California Coastal Act do not apply to the project as there would be no development of permanent structures of mass that could affect coastal resources. Additionally, the location of the W-19 site on the eastern edge of San Dieguito Lagoon and east of I-5 is fairly distant and separated from the waterfront and coastal beach areas. The CTC Trail, which provides east/west connection from the W-19 toward the coast would remain open and available for public use, access, and recreation throughout the duration of the project. The restoration project would not conflict with public access policies outlined in Article 2, and Article 6 (Section 20252) or recreation policies outlined in Article 3.

Article 4 outlines policies related to the protection of the marine environment, addressing topics such as biological productivity and protection of water quality in waters, streams, and wetlands; filling or dredging; movement of sediment; and flood control. The restoration project would work toward improved hydrologic function, quality, and health of the wetlands and overall lagoon area and would not conflict with these policies.

Article 5 (Section 30240) specifically addresses environmentally sensitive habitat areas and the protection of such resources. The restoration project would result in improved habitat values and would not conflict with those policies. The continuation of coastal access and protection of land resources would not be altered or restricted in accordance with requirements of Chapter 3 of the California Coastal Act.

Article 6 (Section 30251) addresses the protection of scenic resources. While some landform alteration is necessary as part of the restoration activities to provide the adequate elevations for established habitat and wetlands, the altered landforms would be compatible and comparable with the surrounding environment and scenic aesthetic. The restoration project would not block or obstruct views of the scenic coastal area.

The restoration project would not create substantial conflicts with policies of the California Coastal Act and would generally work to enhance and improve resources protected by the California Coastal Act. Impacts would be less than significant (Criteria A and B).

City of San Diego MHPA and MSCP

Consideration of the project’s consistency with the Subarea Plan is also provided in the project’s Biological Survey Report (Appendix G). The project is consistent with the goals and objectives.
of the MSCP, and has been designed to comply with the applicable restrictions and requirements therein. Therefore, the project would not conflict with the provisions of the City’s MSCP Subarea Plan or other approved local, regional, or state habitat conservation plan and a less than significant impact would result from implementation of lagoon restoration activities (Criterion C).

Surrounding Communities

San Dieguito Lagoon and the river valley are existing natural elements that have been planned for within many of the local community planning documents and are considered throughout past and ongoing development of the area. The project’s restoration of hydrologic function, wetlands, and habitats throughout the existing lagoon area and the incorporation of those modifications within the Park Master Plan through an addendum would not create a new physical division within an established community. Rather, the project would result in improved biological conditions within the existing natural resources and also provide increased opportunity for recreational connectivity via the proposed north-south trail. The lagoon restoration activities would not impact or modify the operation of equestrian facilities adjacent to the lagoon. For these reasons, the lagoon restoration activities would not physically divide an established community and there would be no impact (Criterion D).

California Department of Fish and Wildlife’s San Dieguito Lagoon State Marine Conservation Area

The W-19 site is located outside of the San Dieguito Lagoon SMCA and no project activities, including future maintenance activities, would occur within the San Dieguito Lagoon SMCA. The SMCA is identified to show location and consistency with coastal zone MPAs. There would be no impact (Criteria A and B).

Recreation

As described in the existing conditions text and land use analysis above, there is a network of formal trails throughout the lagoon. The new trail proposed by the project would provide formal and maintained public recreational access and educational opportunity along the eastern edge of the lagoon where there was previously no access, as shown in Figure 3-2 and described in Section 3.4. Due to the limitations created by the lack of safe pedestrian crossing over the El Camino Real Bridge, the new trail would not connect to the CTC Trail north of the San Dieguito River in the immediate term. However, the proposed replacement of the El Camino Real Bridge by the City of San Diego includes pedestrian walkways and bike lanes on each side of the bridge as part of the proposed design for the approved Eastern preferred Alignment alternative (City of San Diego 2015a). The planned pedestrian facilities associated with the new bridge would be adequate to provide a safe crossing, once the El Camino Real Bridge replacement is complete (anticipated completion in December 2024), to the new trail connection implemented by the proposed project. Future trail connection would allow recreationalists to safely cross over the San Dieguito River, over the San Dieguito River for future trail users. Once the new bridge was installed, the northern end of the new trail alignment would be modified to allow access to the El Camino Real Bridge pedestrian crossing. This would provide trail users the ability to safely cross
the river and connect with the CTC Trail located on the north side of the river. However, even prior to the future connection to the CTC Trail, the new trail as proposed by the project would create an additional mile of trail within the lagoon and would expand the existing trail network through connection with the Dust Devil Nature Trail.

The proposed new trail alignment would provide the opportunity for a future north/south connection that is currently lacking between the Dust Devil Nature Trail in the southeastern portion of the lagoon to the north and eventually to the CTC Trail that traverses the northern boundary of the lagoon. The linkage provided by the new trail (once the El Camino Real Bridge replacement is complete) would increase the functionality of the existing trail network by allowing recreationalists to seamlessly connect to both trails and traverse the entire lagoon areas, whereas the existing trails currently operate independently with no available connectivity. The new trail would also provide a link from the Gonzalez Canyon trail system to the southeast to the CTC Trail, including potential equestrian access in the future (although the proposed El Camino Real Bridge/Road Widening Replacement Project is not designed to accommodate equestrians). This connectivity would be even more critical into the future as the eastern segments of the regional CTC Trail continue to be developed.

The new trail would be designed according to trail standards outlined in the Park Master Plan and would include interpretative elements such as signage at appropriate places along the trail and split rail fencing consistent with existing trail fencing.

During construction, recreation activities would be restricted in some areas for safety but generally able to continue in areas surrounding the active construction area (see Materials Disposal below for discussion of haul routes and trails). The W-19 site is not currently open to the public and no formal trails traverse the area. Recreational enjoyment of the area, such as trail hiking and nature observation from the trails or Birdwing Open Air Classroom, may be slightly disturbed or altered during the restoration activities as recreationalists in the immediate vicinity (such as along the CTC Trail to the north) would be able to view and hear construction activities. This visual and audible disruption of the area would be temporary and would cease at the end of lagoon restoration activities. While these effects could be considered a temporary nuisance to the recreationalists in the immediate vicinity of the restoration site, the recreational opportunities would remain available throughout construction and would not be lost or permanently impacted.

Thus, lagoon restoration activities would not result in temporary or permanent and major loss of recreational use areas or major conflicts with recreational uses, and the impact would be less than significant (Criterion E).

Materials Disposal

This section provides analysis of land use and recreation impacts that would result from materials disposal, including the use of offroad haul routes.

Unlike the project restoration site, the disposal site is outside of the JPA Park Master Plan and there is no element of the project that would modify the jurisdictional authority or add it to be within the Park Master Plan boundary.
5.1 Land Use and Recreation

Land Use

City of San Diego General Plan

Use of the site for the disposal of material and revegetation does not conflict with the general designation of Open Space, Parks, and Recreation as it would remain as vegetated open space once the project is complete and does not preclude future development from occurring.

As described for the restoration activities, policies most applicable to the project are generally found within the Land Use and Community Planning Element, Recreation Element, and Conservation Element. The proposed materials disposal would be consistent with the applicable goals and policies of the General Plan related to the maintenance and preservation of open space lands and the protection and enhancement of sensitive ecological and natural resources, including maintaining and preserving scenic views (see Section 5.7 for visual resources analysis), such as those of the Pacific Ocean from El Camino Real. There would be no need for a variance or deviation from the policies of the General Plan and the project would not conflict with the environmental goals, objectives, and recommendations of the plan. **Impacts would be less than significant (Criteria A and B).**

NCFUA Framework Plan

Within the Subarea II Additional Sensitive Lands designation, activities and development within the site are guided primarily by Open Space Guiding Principles. While the disposal site would be disturbed during the placement of material, once complete, the site would be revegetated as coastal sage scrub and would continue to be vegetated open space with no structures or other development. There would be no need for a variance or deviation from the policies of the Framework Plan and materials disposal would not conflict with the environmental goals, objectives, and recommendations of the community plan. **Impacts would be less than significant (Criteria A and B).**

Carmel Valley Community Plan

During disposal activities, the small portion of the disposal site located within the Carmel Valley Community Plan would be disturbed and vegetation removed. However, once materials disposal activities are completed, the disposal site would be revegetated as coastal sage scrub. The site would continue to be open space vegetated with coastal sage scrub. This would be consistent with the Natural Open Space designation of the Carmel Valley Community Plan and would not result in significant physical impacts due to a variance or deviation. **Materials disposal would not conflict with the environmental goals, objectives, and recommendations of the community plan. Impacts would be less than significant (Criteria A and B).**

JPA San Dieguito River Park Concept Plan

The Concept Plan does not specifically address materials disposal as part of the lagoon restoration plan; however, the design of the disposal site would maintain views of the Pacific Ocean to the west and would be consistent with the Special Design Considerations for the Del
Mar Coastal Lagoon Landscape Unit related to the protection of open space views. The Design and Development Standards in the Concept Plan emphasize limited grading and, while a large amount of earthwork would be necessary during placement of the disposal material, the placement would be designed to blend and contour into the existing hillsides and have a natural final appearance. As described in the Design and Development Standards, the exposed soils of the disposal site would be revegetated after material placement to minimize potential for erosion. Also consistent with the standards, revegetation would use native coastal sage scrub vegetation. There are no structures or facilities associated with disposal that would be subject to the specifications of the Design and Development Standards. Thus, the proposed disposal site would be compatible with the policies of the Concept Plan and would not conflict with the environmental goals, objectives, and recommendations of the plan. **Impacts would be less than significant (Criterion B).**

**Zoning**

The City of San Diego Municipal Code Section 153.0312 states that within this zone open space preservation is required and limits the future use of open space. The majority of the disposal site has been used previously as a materials disposal location and the addition of material from the W-19 restoration activities to the site would not compromise the open space nature of the site and the land would continue to be undeveloped. After disposal is complete, the site would be revegetated as coastal sage scrub and could continue to be vegetated open space with no structures or other development. Thus, **the use of the disposal site would be consistent with the existing zoning regulations and would not result in significant physical impacts due to a variance or deviation. No impacts would occur (Criteria A and B).**

**Environmentally Sensitive Lands**

There are steep hillsides (greater than 25 percent slope) designated in various areas immediately south of the disposal site; however, the steep hillsides are outside of the disposal site boundaries and disposal activities would not encroach into the designated sensitive steep hillsides. The disposal site is located outside of special flood hazard areas as designated by FEMA (FEMA 2012) and there are no wetlands or wetland buffer areas associated with the disposal site. There are sensitive biological resources near the disposal site area, such as various scrub habitats. The City would make the final determination whether ESL Regulations apply to the disposal site.

Similar to the project site, the entire disposal site is located within the City’s Coastal Overlay designation and would be subject to development restrictions associated with that designation. **The use of the disposal site would be consistent with ESL and Coastal Overlay regulations; thus, a less than significant impact would result (Criteria A and B).**

**Coastal Zone**

Similar to the W-19 site, the disposal site is under coastal permit authority of the CCC as it is located within the Local Coastal Program Deferred Certification area. The disposal site would remain as open space and be revegetated once disposal activities are complete. As detailed in Section 3.4, materials disposal would raise the elevation of the site, but placement has been
5.1 Land Use and Recreation

specifically designed to maintain an elevation lower than El Camino Real to avoid blocking westerly ocean views. Disposal activities would be consistent with coastal zone policies and would not result in a deviation or variance that would create a physical impact on the environment. A less than significant impact would result (Criteria A and B).

Similar to the restoration project, many of the policies contained in Chapter 3 of the California Coastal Act do not apply to disposal as there would be no development of permanent structures that could affect coastal resources. Like the restoration site, the location of the disposal site on the southeastern edge of San Dieguito Lagoon and east of I-5 is fairly distant and separated from the waterfront and coastal beach areas. The Dust Devil Nature Trail that would be temporarily closed during the week does not provide coastal access. The restoration project would not conflict with public access policies outlined in Article 2 and Article 6 (Section 20252) or recreation policies outlined in Article 3.

Article 5 (Section 30240) specifically addresses environmentally sensitive habitat areas and the protection of such resources. The disposal would disrupt some areas of vegetation as material is placed; however, the area would be revegetated with coastal sage scrub habitat and the sensitive habitat would be restored and expanded throughout the site. Thus, the resulting protection of land resources would be in accordance with requirements of Chapter 3 of the California Coastal Act.

Article 6 (Section 30251) addresses the protection of scenic resources. While landform alteration is necessary as part of materials disposal, the placement has been designed to conform to the abutting hillsides and result in a natural and comparable aesthetic with the surrounding topography. The height of material placed on the site has been designed to be at levels below the sight line from El Camino Real toward the coast and would not block or obstruct views toward to the scenic coastal area. Thus, the materials disposal would not create substantial conflicts with policies of the California Coastal Act and impacts would be less than significant (Criteria A and B).

City of San Diego MSCP

The disposal site is not located within the MHPA boundaries; thus, regulatory requirements associated with the City’s MSCP Subarea Plan do not apply to the disposal site. Regardless, disposal activities and revegetation of the site would be consistent with the goals and objectives of the MSCP, after restoration of coastal sage scrub habitat. Disposal would not conflict with the provisions of the City's MSCP or other approved local, regional, or state habitat conservation plan and a less than significant impact would result (Criterion C).

Surrounding Communities

As described above under W-19 Restoration, San Dieguito Lagoon and the river valley are existing natural elements incorporated into local community planning and development. The disposal of material would not create a new physical division within an established community as a portion of the area has been used previously for the purpose of materials disposal and generally consists of open space that is not formally accessible to the public. The raised topography resulting from the materials disposal would not block views or otherwise divide or
separate the area as the overall openness of the area would be retained. For these reasons, the materials disposal would not physically divide an established community and there would be no impact (Criterion D).

**Recreation**

During materials disposal, there would be temporary disruptions to the existing trail network due to the haul routes used to transport material from the W-19 site to the disposal site. The use of offroad haul routes would avoid the need for construction vehicles to travel on public roadways. To minimize new areas of disturbance, haul routes would utilize existing maintenance roads and trail alignments and, in some locations, parallel or cross over trails. Specifically, this would affect the Dust Devil Nature Trail as shown in Figure 3-8. During construction, a portion of the haul routes would utilize segments of the Dust Devil Nature Trail’s northern loop and eastern loop and would also cross over the trail in certain locations. As part of standard construction practices (Table 3-2), the affected trail segments would be closed to public use during weekday construction activities, and simultaneous use of the trail by construction equipment and recreationalists would not occur. Construction is scheduled Monday through Friday, which would allow for safe trail use during the weekend as the trail would be open at this time. Though restricted during the week, the Dust Devil Nature Trail loops would continue to be accessible to the public during weekends throughout the construction period (PDF-5).

Once material has been transported to the disposal site, construction equipment would spread and compact it. While there are no formal trails or public use areas near the disposal site, informal pathways and maintenance roads are used by hikers and are located around the perimeter of the site, particularly the southern, eastern, and northeastern sides. To avoid potential safety hazards due to recreationalists hiking near the disposal site area, the disposal site perimeter would be temporarily fenced to restrict public access and signage would be placed to inform the public of the active construction operations as part of standard construction practices (Table 3-2).

Similar to lagoon restoration, recreational enjoyment may be slightly disturbed or altered during materials disposal operations as recreationalists in the immediate vicinity would be able to view and hear construction activities. This visual and audible disruption of the area would be temporary and would cease at the end of disposal activities. While these effects could be considered a temporary nuisance to the recreationalists in the immediate vicinity of the disposal site, recreational opportunities would remain available throughout construction and would not be lost or permanently impacted.

The CTC Trail or other recreational facilities would not be affected by disposal and the new trail alignment would not be impacted as the new trail would not open until lagoon restoration and disposal operations were complete. Access to other recreational facilities and opportunities within the lagoon are not located near the haul routes or disposal site and would not be affected by disposal.

Because trail access would remain available along the CTC Trail and the Dust Devil Nature Trail would be available during weekend days throughout construction, disposal would not result in
substantial temporary or permanent loss of recreational use areas or major conflicts with recreational uses. The impact would be less than significant (Criterion E).

**W-19 Wetlands Maintenance**

**Land Use**

Inlet maintenance after large storm events would be required after implementation of the project. Sediment removal would be limited to identified inlet and adaptive maintenance areas that are within the proposed W-19 project footprint (Figure 3-9). The maintenance activities would assist in achieving and maintaining the long-term success of the project and would not change the land use from the enhanced open space wetland. There would be no modification of land outside of the project footprint or any type of activities that could influence surrounding uses. Maintenance within the inlet and interior of the wetlands would generally not be of the nature to conflict with existing land uses or land use planning documents, such as the beach nourishment policies found in the City of Del Mar Community Plan (City of Del Mar 1976). While access to the active construction area on the beach would be temporarily restricted for public safety during material placement, access to surrounding beach areas would remain available and would not conflict with public access policies of the City of Del Mar.

Implementation of the proposed project would require monitoring, maintenance, and adaptive management plans as detailed in Section 3.5. While exact specifications would be determined during final design and permitting, the general activities are similar in nature to those proposed as part of the project, such as biological surveys, material removal from wetlands interior, monitoring of construction activities, and vegetation planting and removal. These activities would all take place within the footprint of the proposed project and would not expand beyond the area analyzed for project implementation. Additionally, these monitoring, maintenance, and adaptive management activities are similar to the actions proposed by the project and are generally not of the nature to conflict with existing land uses or land use planning documents, or require a deviation or variance that could physically impact the environment.

The proposed inlet maintenance and ongoing management activities would be consistent with the applicable goals and policies applicable to the project site related to the maintenance and preservation of open space lands and the protection and enhancement of sensitive ecological and natural resources. There would be no need for a variance or deviation from applicable policies; the project would not conflict with the MSCP or other environmental goals, objectives, and recommendations; and the project would not divide an established community. There would be no impact (Criteria A, B, C, and D).

**Del Mar LCP and California Coastal Act**

The tidally influenced beach areas would be within the retained coastal permit authority of the CCC and all necessary CCC coordination and permit requirements would occur as part of project approval. Disposal activities would be consistent with LCP policies and a less than significant impact would result (Criteria A and B).
Several sections of the California Coastal Act focus on shoreline construction, specifically Sections 30235, 30233, and 30706. All of these sections contain an element pertaining to the protection of existing structures and the protection of public beaches in danger of erosion. Section 30233(b) of the California Coastal Act specifies that dredge spoils suitable for beach nourishment should be transported for such purposes to appropriate beaches or into suitable longshore current systems. Similar to the restoration activities, many of the policies contained in Chapter 3 of the California Coastal Act do not apply to maintenance material placement as there would be no development of permanent structures that could affect coastal resources. The placement of material on the beaches would require the temporary restriction of public access to the immediate beach area receiving material, but would not conflict with public access policies outlined in Article 2 and Article 6 (Section 20252), or recreation policies outlined in Article 3 as access to surrounding beach areas would be maintained. Article 6 requires spoils disposal to be planned and carried out to avoid significant disruption of marine and wildlife habitats, and water circulation. As described in Sections 5.3, Coastal Processes and Sediment Delivery, and 5.6, Biological Resources, of this EIR, the marine environment would not be significantly impacted by material placement. Article 5 (Section 30240) specifically addresses environmentally sensitive habitats and parklands and the protection of such resources. The beach placement would not affect sensitive habitat and the scenic areas at the top of the bluffs would not be affected. The material placement would provide additional protection for the sensitive coastal bluffs located the back of the beach along the northern placement site and sandy beach areas would be restored and expanded throughout the placement sites. Thus, the resulting protection of land resources would be in accordance with requirements of Chapter 3 of the California Coastal Act. Article 6 (Section 30251) addresses the protection of scenic resources and the placement of material would not be at an elevation that could block or obstruct views toward the ocean. Thus, maintenance would not create substantial conflicts with policies of the California Coastal Act and impacts would be less than significant (Criteria A and B).

Recreation

The locations identified for material removal would be within the project footprint (Figure 3-9) and in locations not accessible to the public or immediately adjacent to trails. Material removal would not affect recreational uses in or around the lagoon. The haul routes necessary to transport sediment removed during maintenance would, at certain locations, be adjacent to or require crossing the proposed new trail, as shown in Figure 3-10. When construction operations would interfere with safe use of the new trail, that portion of the trail would be closed until construction activities were complete, similar to the requirements listed for initial restoration work in PDF-5. Because trail access would remain available along the CTC Trail and Dust Devil Nature Trail, and the new trail would be available during weekend days, inlet maintenance activities would not result in substantial temporary or permanent loss of recreational use areas or major conflicts with recreational uses. The impact would be less than significant (Criterion E).

Material removed during inlet maintenance activities would be placed at beach locations as shown in Figure 3-10. These locations are the same locations used in the ongoing SCE restoration project maintenance and the material placement methods would also be similar. Material placement would require temporary beach closures in the immediate vicinity of the construction activities for safety purposes (PDF-6). Beach access by construction equipment
would be as shown in Figure 3-10. Public access points to the local beaches, outside of the active construction area, would not be restricted (PDF-7, PDF-9). Once completed, the affected beach area would be reopened to the public and have an increased sand volume for recreational beach enjoyment. The temporary closure of a beach area during material placement would not result in a substantial loss of recreational use or conflict as similar beach use is available in the surrounding areas and beach recreation would be enhanced with the material placement. **The impact would be less than significant (Criterion E).**

### 5.1.4 SIGNIFICANCE OF IMPACTS

No significant impacts to land use or recreation have been identified for the proposed project. Table 5.1-1 summarizes the impact conclusions identified in the Impact Analysis for each threshold of significance.

<table>
<thead>
<tr>
<th>Threshold</th>
<th>W-19 Restoration</th>
<th>Materials Disposal</th>
<th>W-19 Wetlands Maintenance</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. Require a deviation or variance from a regulatory agency and the deviation or variance would in turn result in a physical impact on the environment.</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>B. Result in a conflict with the environmental goals, objectives and recommendations of the community plan in which it is located.</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
</tr>
<tr>
<td>C. Conflict with the provisions of the City's Multiple Species Conservation Program Subarea Plan or other approved local, regional or state habitat conservation plan.</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
<td>No Impact</td>
</tr>
<tr>
<td>D. Physically divide an established community.</td>
<td>No Impact</td>
<td>No Impact</td>
<td>No Impact</td>
</tr>
<tr>
<td>E. Result in temporary or permanent and critical loss of recreational use areas or conflicts with recreational uses.</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
<td>Less than Significant</td>
</tr>
</tbody>
</table>

### 5.1.5 MITIGATION MEASURES

No significant land use or recreation impacts were identified for lagoon restoration, materials disposal, or maintenance. No mitigation is required.
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