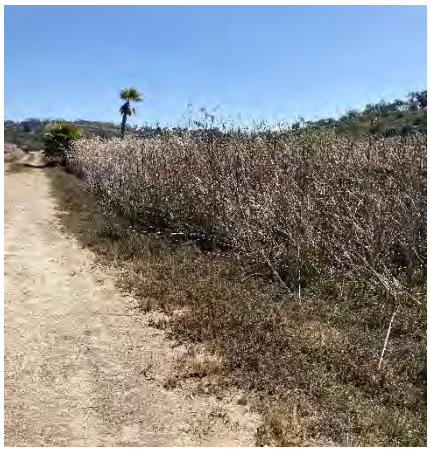
DRAFT

Initial Study/Mitigated Negative Declaration

San Dieguito River Park Osuna Segment of the Coast to Crest Trail Project

May 2023



Prepared by:

San Dieguito River Park

SAN DIEGUITO RIVER PARK
JOINT POWERS AUTHORITY
8372 Sycamore Creek Road
Escondido, CA 92025

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INITIAL STUDY

1. Initial Study Introduction

1.1 Initial Study Information Sheet

1. **Project title:** Osuna Segment of the Coast to Crest Trail

2. **Lead agency name and address:** San Dieguito River Park Joint Powers Authority (JPA)
18372 Sycamore Creek Road
Escondido, CA 92025

3. **Contact person and phone number:** Shawna Anderson, AICP
JPA Executive Director
858.674.2275 ext. 13
shawna@sdrp.org

4. **Project location:** The Project is located between the Rancho Santa Fe and Fairbanks Ranch communities in San Diego County approximately 2.5 miles east of Interstate 5, spanning approximately 1 mile between Via de la Valle and San Dieguito Road and crosses over the San Dieguito River. It is located within two jurisdictions:

   - City of San Diego and unincorporated San Diego County (see Figure 3).

5. **Project sponsor's name and address:** Same as the lead agency

6. **Community plan designation:** Open Space, City of San Diego

   Open Space and Agriculture, County of San Diego

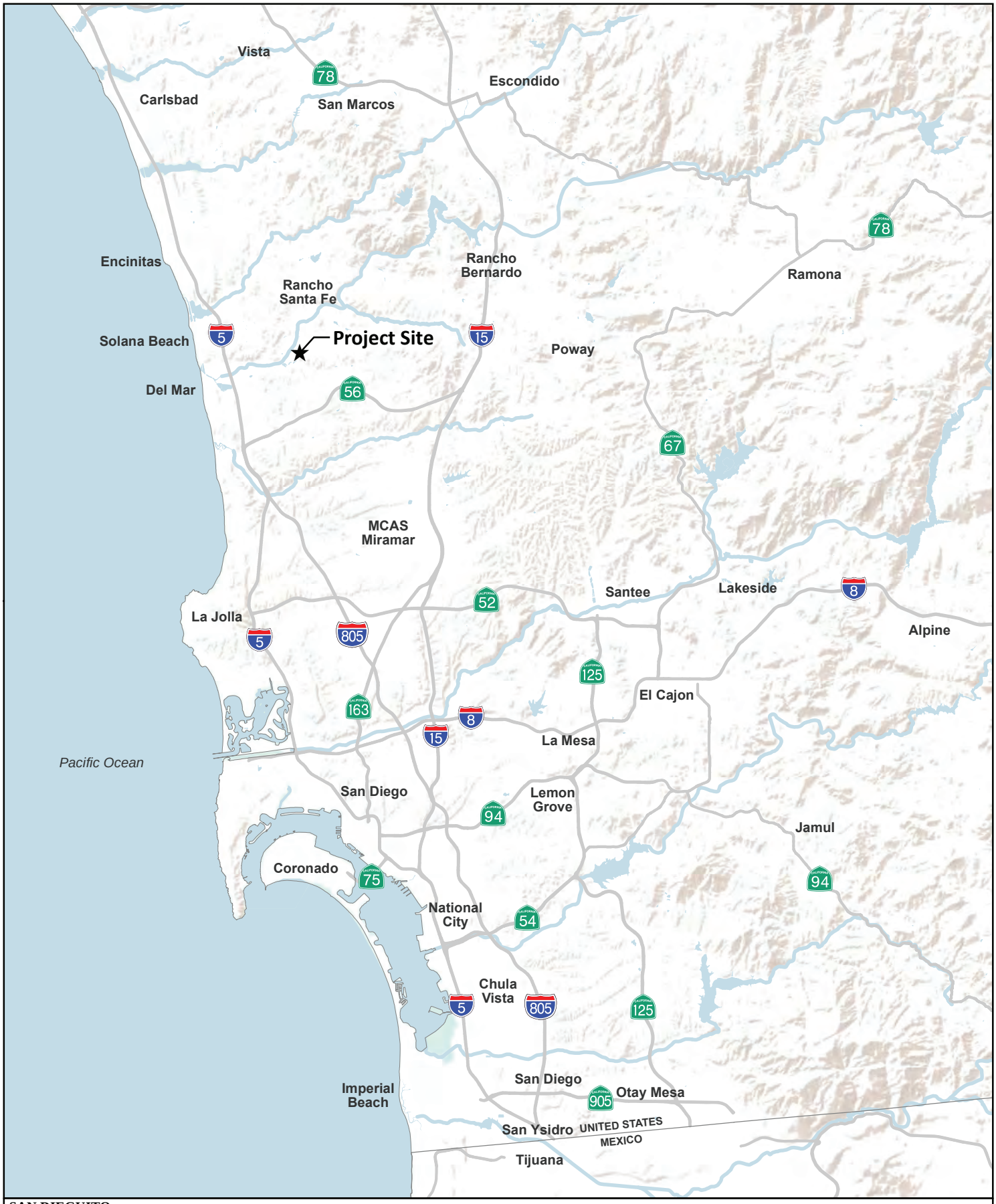
7. **Zoning:** City OF-1-1, AR-1-1, AR-1-2

   County S88

8. **Project Description:**

Overview

The San Dieguito River Park Joint Powers Authority (JPA) proposes to construct the 1-mile-long Osuna Segment of the Coast to Crest Trail including a 150-foot bridge crossing the San Dieguito River. The trail would run along the border of the City of San Diego and unincorporated San Diego County, approximately 3.5 miles northeast of the City of Del Mar, California (**Figure 1** and **Figure 2**). The project area is located east of Interstate 5, and approximately 1.30 miles east of El Camino Real and lies between Via De La Valle to the west, and San Dieguito Road to the east (**Figure 3**). The Coast to Crest Trail (CTC) is a planned 71-mile-long, non-vehicular, and multi-use regional trail that would ultimately extend from the beach at Del Mar to Volcan Mountain, north of Julian. The CTC Trail is designed for hikers, bicyclists, and equestrians. Approximately 49 miles of the regional trail has been constructed and is now in use. The proposed Osuna Segment of CTC Trail Project (Project) is included in both the JPA-adopted San Dieguito River Park Concept Plan (1994, updated 2002) and the County of San Diego Regional Trails Plan.



SAN DIEGUITO RIVER PARK

N
W E
S

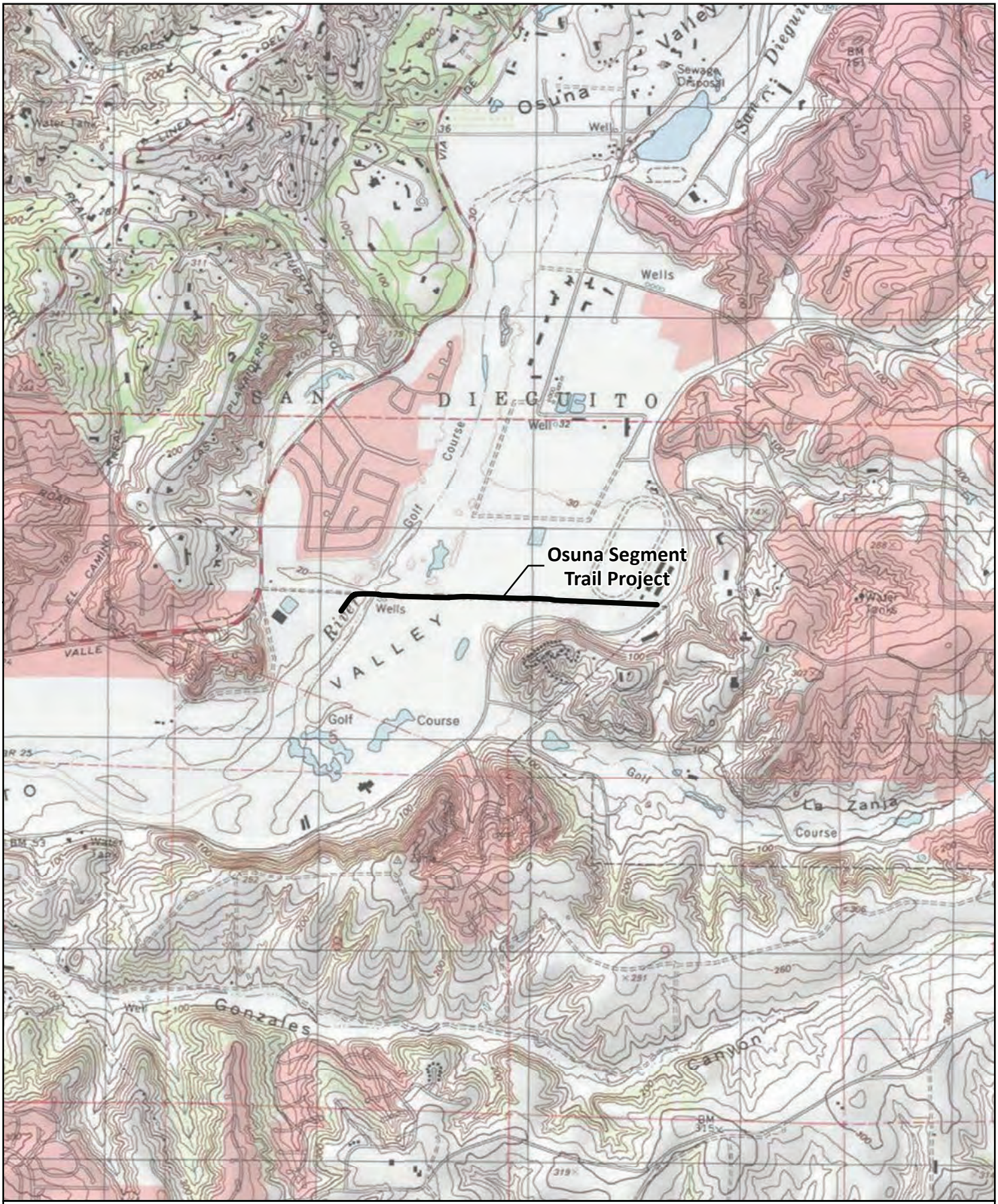
0 2.5 5 Miles

Source: Esri, USGS, NOAA

Figure 1

OSUNA SEGMENT OF THE COAST TO CREST TRAIL

Regional Map



SAN DIEGUITO RIVER PARK

N
W E
S

0 1,000 2,000 Feet

Source: USGS 7.5' Quadrangles (Del Mar, Rancho Santa Fe)

Figure 2

OSUNA SEGMENT OF THE COAST TO CREST TRAIL

Vicinity Map

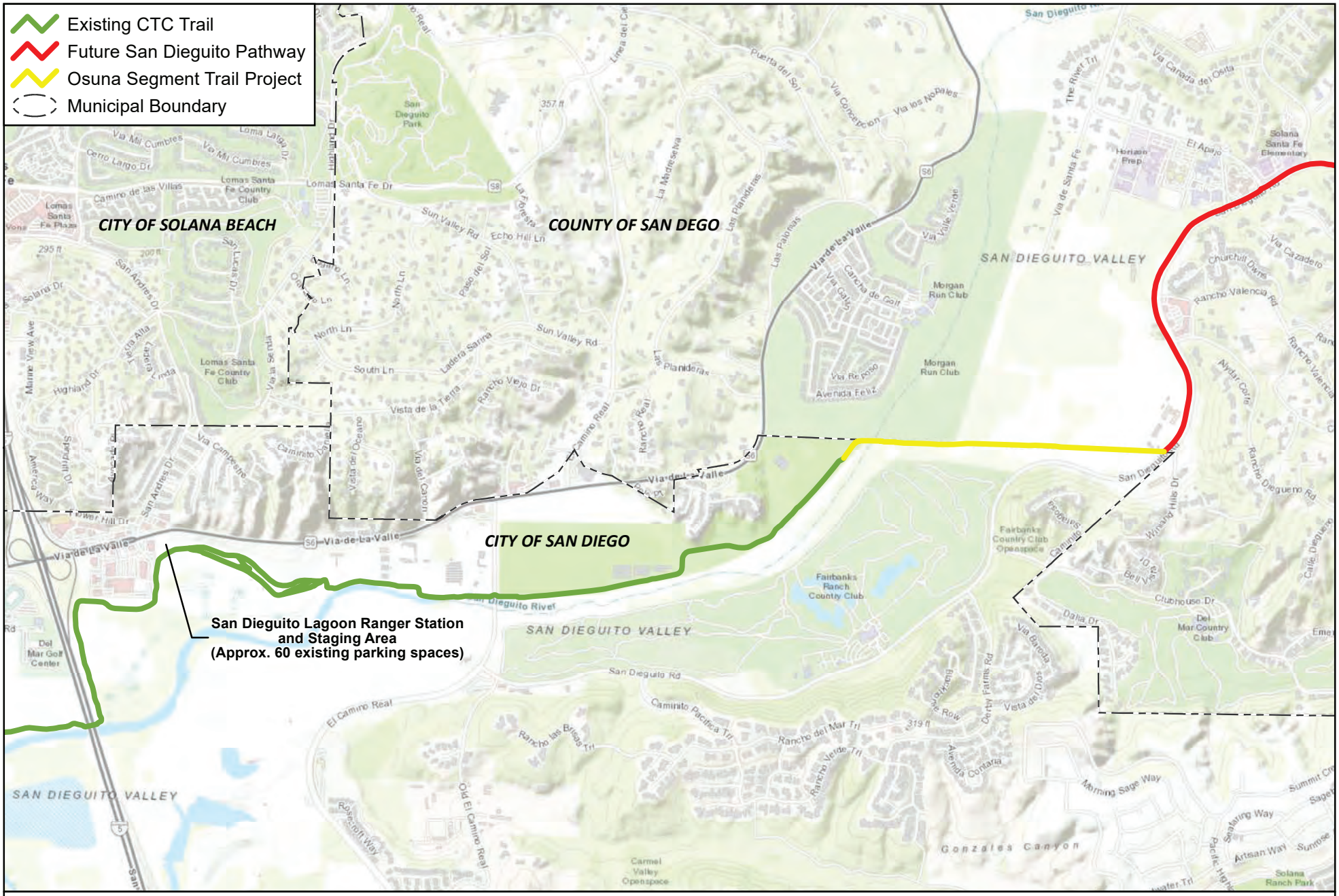


Figure 3

OSUNA SEGMENT OF THE COAST TO CREST TRAIL

Project Location

The potential for impacts associated with the construction of the full 71 miles of the Coast to Crest Trail was examined in the previously certified San Dieguito River Park Concept Plan Program EIR (SCH# 91121059), which is incorporated by reference into this document. The Program EIR, which was certified by the San Dieguito River Park JPA Board of Directors on February 18, 1994 (updated 2002), addressed program-wide issues such as cumulative impacts and policy alternatives for the various park proposals within the Focused Planning Area (FPA) incorporated in the Concept Plan, including the Coast to Crest Trail. Program level mitigation measures were identified in the Final Program EIR to be incorporated into individual park-initiated projects as they are approved.

The proposed project is located in Landscape Unit C (Osuna Valley) of the FPA (Concept Plan, 1994). Proposed relevant park proposals identified in the Concept Plan are to pursue easements to accommodate the CTC Trail and restore the riparian corridor through public and private initiatives.

This proposed project would extend the existing CTC Trail by 1 mile from the eastern end of its current terminus at the Surf Cup Sports Park Facility (former polo fields) to link the trail to the future San Dieguito Road Pathway (**Figure 4**). The Project would connect the established lagoon segments of the CTC Trail to the eastern inland trail segments.

Project Purpose and Objectives

The purpose of the Project is to connect the existing CTC Trail from the east end of its current terminus at the Surf Cup Sports park to San Dieguito Road and Pathway thereby extending the CTC Trail by 1 mile. This connection facilitates the completion of the CTC Trail in the project area.

The Project's proposed improvements include a 1-mile-long decomposed granite (DG) trail and (non-vehicular) bridge crossing at the San Dieguito River. The trail bridge crossing is needed to connect the Osuna segment of CTC Trail to the future CTC San Dieguito Road pathway and the rest of the CTC Trail located on the south side of the river traveling east. The Project has been designed to site the bridge, abutments, and trail to avoid native habitats, including wetlands, to the greatest extent feasible. Following construction, vegetated areas that are temporarily disturbed by construction activities would be revegetated to appropriate native habitat.

The objectives of the proposed project are to:

- Construct the Osuna Segment of the Coast to Crest Trail through the Fairbanks Ranch area as identified in the San Dieguito River Park Concept Plan and County of San Diego Regional Trails Plan.
- Connect the Trail to the other existing segments of CTC Trail by extending the trail from the eastern end of its current terminus at the Surf Cup Sports fields (formerly Polo Fields) to the planned trail pathway along San Dieguito Road.
- Avoid wetlands and other native habitats to the greatest extent feasible and practicable.
- Minimize impacts to riparian areas and native habitats by aligning the trail and bridge through disturbed areas, using fencing to define the trail and protect adjacent native habitat, and bridging over (spanning) the river.
- Avoid impacts to hydrology and water quality by designing the trail bridge according to approved engineering standards and codes and incorporating design features that reduce impacts within the river and floodplain.
- Provide a safe and enjoyable multi-use trail experience for the trail users (hikers, bicyclists, and equestrians).
- Avoid and minimize impacts to historic, cultural, and tribal resources.

Project Location

The regional map and project vicinity map (Figure 1 and Figure 2) depict the general area of the project in north-central San Diego County. The Project is located within the Rancho Santa Fe and Fairbanks Ranch communities in San Diego County approximately 2.5 miles east of Interstate 5, spanning approximately 1 mile between Via de la Valle and San Dieguito Road and crosses over the San Dieguito River. It is located within two jurisdictions: City of San Diego and unincorporated San Diego.

Existing Site Conditions

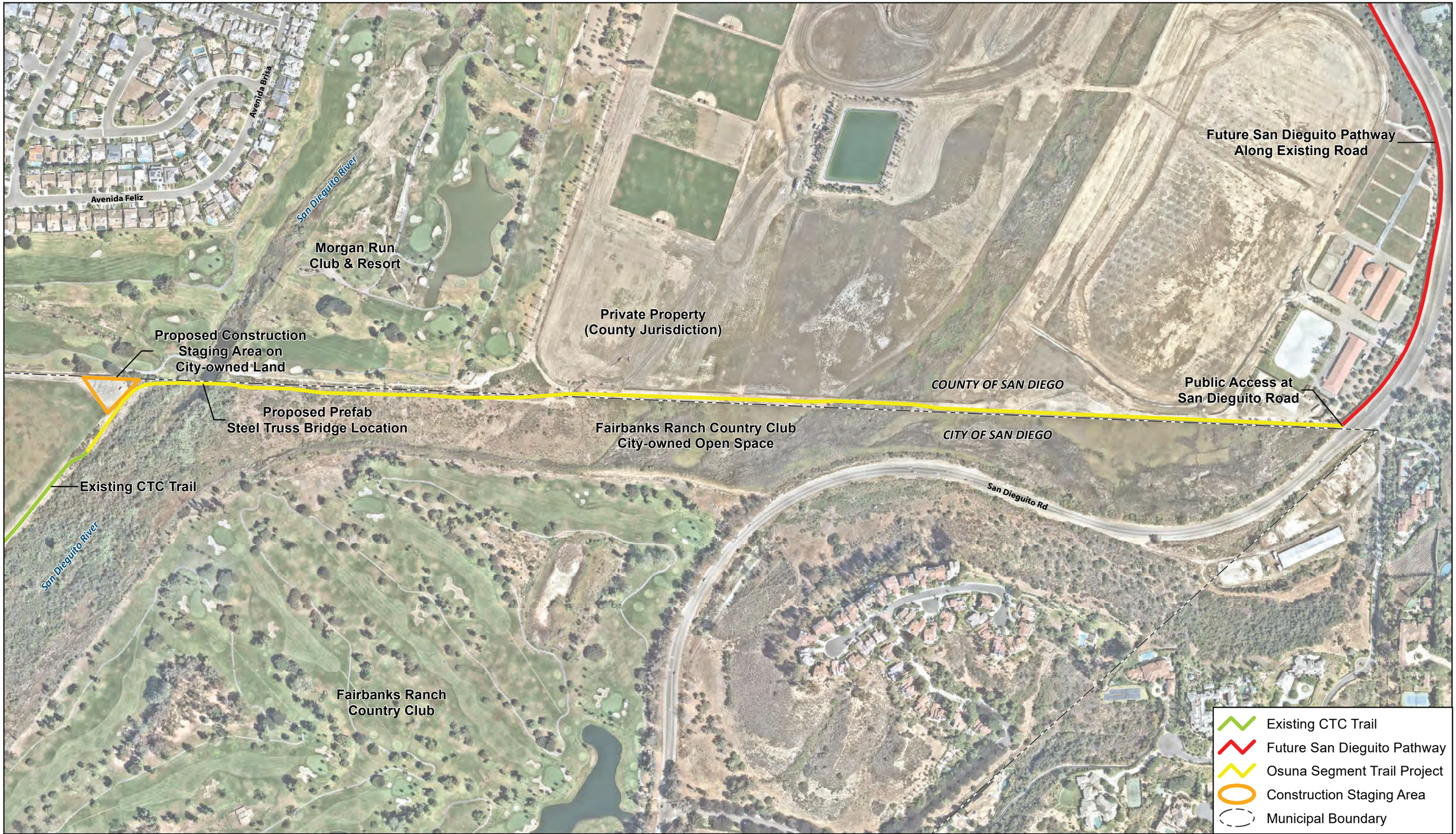
The Project area is a mix of active recreational open space including two golf courses and a sports field operation (Surf Cup Sports) and large-lot single-family homes. The San Dieguito River flows year-round through the Project area, eventually draining into the San Dieguito Lagoon located approximately 1.5 miles further west. The river channel has been modified in this area by previous development, largely confining the riverbed to a narrower channel within a broader floodplain. The river's wide 100-year floodplain (approximately 1,000 feet wide in the project location) spans the entire project area and beyond. Three major roadways exist in the area, Via de la Valle to the northwest, El Camino Real to the west, and San Dieguito Road to the east. The private Morgan Run Country Club and Resort and a gated residential Whispering Palms community both lie to the north. The Fairbanks Ranch Country Club and golf course is located to the south on land owned by the City of San Diego and leased to the private country club. The Surf Cup Sports operation to the west of the project site (formerly polo fields) is also leased on land owned by the City of San Diego. The City-owned land was set aside as open space in the 1980s when the community of Fairbanks Ranch was developed.

The Olivenhain Municipal Water District (OMWD) has utility easements in the area and supplies recycled water to surrounding users including the nearby sports fields and operates a groundwater test well, near the project area, that monitors groundwater quantity and quality for a potential groundwater extraction project. An underground recycled water line installed by OMWD in 2019 passes through the project site including where the trail bridge is proposed. The pipeline is located 50 feet below ground and under the river. Consultation and coordination between the JPA and OMWD during Project design resulted in modifications to the bridge structure and footings to avoid impacting the pipeline.

The San Dieguito River has been modified in this area by previous development (residential developments, golf courses, and roadways) and is largely confined to a narrower channel within a broader floodplain. The river is channelized further west as it approaches El Camino Real approximately 1.5 miles to the west. The CTC Trail exists to the west of the project site along the Surf Cup Sports lease area adjacent to the San Dieguito River and currently terminates at the eastern boundary of the lease area. Just beyond the lease area the San Dieguito River channel makes a sharp bend to the north.

Existing Biological Conditions

The existing environmental conditions of the project area include a characteristic riparian corridor bordering the San Dieguito River. These conditions include open water associated with the river, riparian and riverine habitats, and transitional upland scrub habitats. The area is under the tidal influence of the San Dieguito Lagoon downstream of the Project site; therefore, pockets of saline habitat exist in the study area. El Apajo Creek and Del Rayo Drainage exist north of the project area and flow into the San Dieguito River north of the project site. Given the riverine and wetland habitats present in the study area, sensitive species have the potential to occur. **Figure 5** through **Figure 9** illustrate the vegetation communities that exist in the project area and impacts in those areas (Appendix A, *Biological Technical Report*). Additionally, photographs of the project area are depicted in **Figure 10** through **Figure 14** (photos 1 through 7).



SAN DIEGUITO RIVER PARK

N W E S

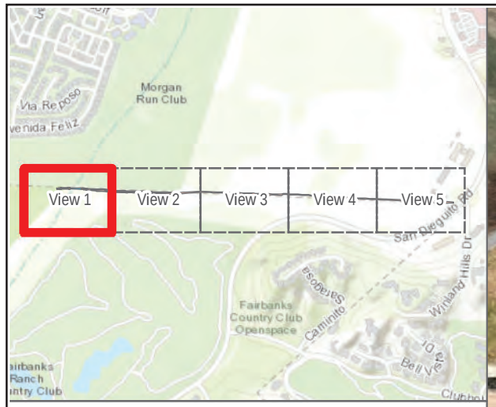
0 175 350 Feet

Source: Kimley-Horn; Aerial Photo: Maxar, Esri 2022

Figure 4

OSUNA SEGMENT OF THE COAST TO CREST TRAIL

Site Plan



Study Area

Vegetation Communities/Land Covers

- ADR, Arundo Donax Riparian
- CSM, Coastal Salt Marsh
- CSS, Coastal Sage Scrub
- CSSB, Coastal Sage Scrub-Baccharis Dominated
- DEV, Developed
- DH, Disturbed Habitat
- DW, Disturbed Wetlands
- FWM, Freshwater Marsh
- MFS, Mulefat Scrub
- NNR, Non-Native Riparian
- ORN, Ornamental
- OW, Open Water
- dSRW, disturbed Southern Riparian Woodland
- SWS, Southern Willow Scrub
- dSWS, disturbed Southern Willow Scrub
- TS, Tamarisk Scrub

Jurisdictional Delineation

- USACE/RWQCB Non-Wetland Waters; CDFW Streambed
- USACE/RWQCB Wetlands; CDFW Riparian Habitat
- CDFW Riparian Habitat
- City of San Diego Wetlands

Proposed Impact Component

- Trail
- Grading Limits
- Bridge
- Abutment

0 40 80 Feet

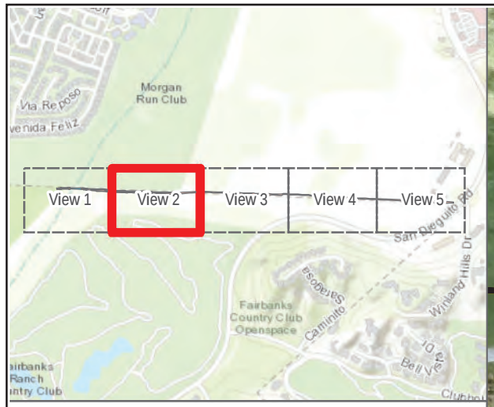
SAN DIEGUITO RIVER PARK

Source: Dudek 2023; Aerial Photo: Kimley-Horn 2021

Figure 5

OSUNA SEGMENT OF THE COAST TO CREST TRAIL

Impacts to Biological Resources Map - View 1



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0 40 80 Feet

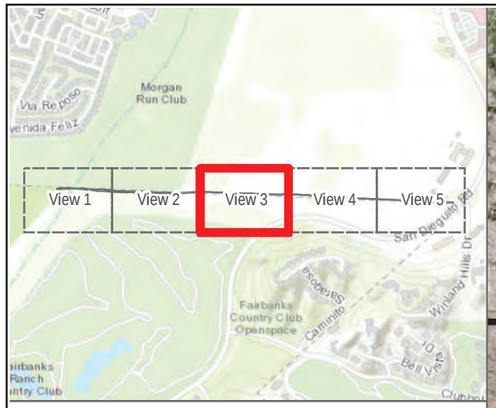
SAN DIEGUITO RIVER PARK

Source: Dudek 2023; Aerial Photo: Kimley-Horn 2021

Figure 6

OSUNA SEGMENT OF THE COAST TO CREST TRAIL

Impacts to Biological Resources Map - View 2



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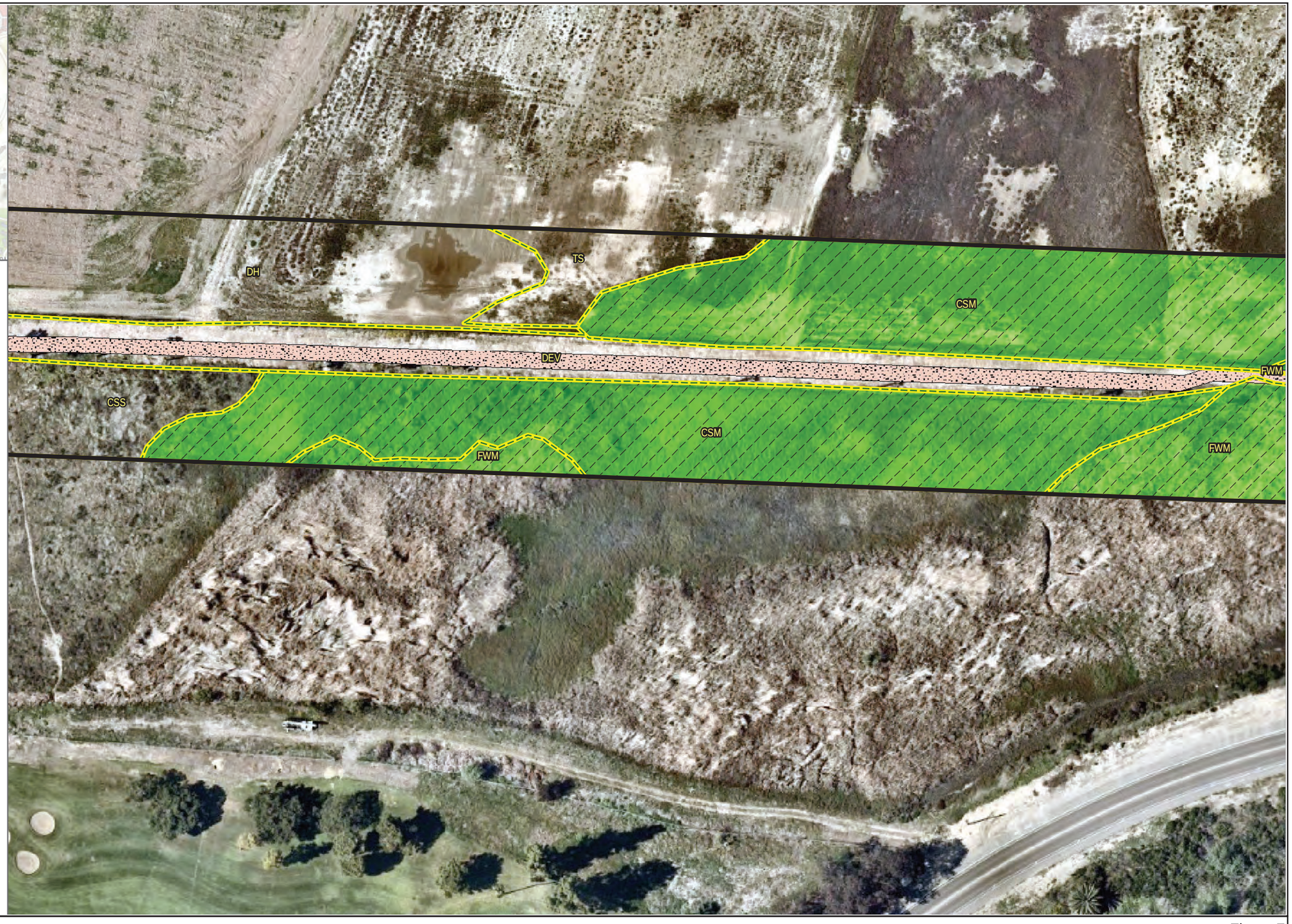


0 40 80 Feet

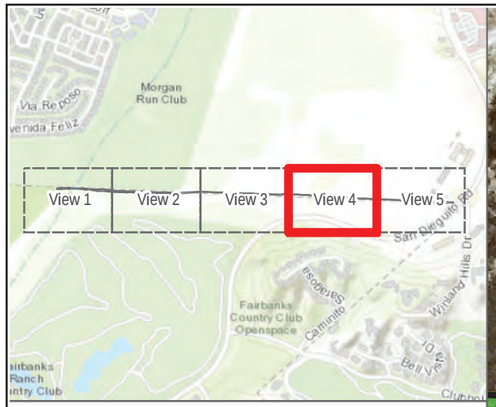
SAN DIEGUITO RIVER PARK

Source: Dudek 2023; Aerial Photo: Kimley-Horn 2021

Figure 7

OSUNA SEGMENT OF THE COAST TO CREST TRAIL

Impacts to Biological Resources Map - View 3



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- City of San Diego Wetlands

Proposed Impact Component

- Trail
- Grading Limits
- Bridge
- Abutment

0 40 80 Feet

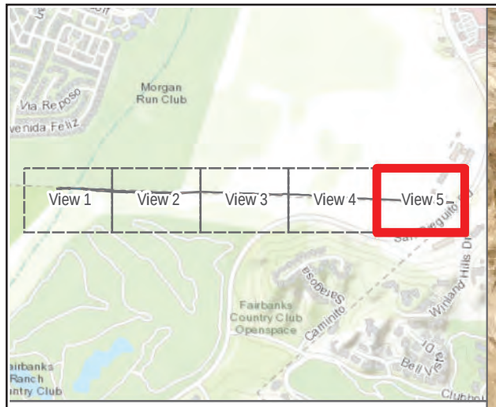
SAN DIEGUITO RIVER PARK

Source: Dudek 2023; Aerial Photo: Kimley-Horn 2021

Figure 8

OSUNA SEGMENT OF THE COAST TO CREST TRAIL

Impacts to Biological Resources Map - View 4



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Proposed Impact Component

- Trail
- Grading Limits
- Bridge
- Abutment

0 40 80 Feet

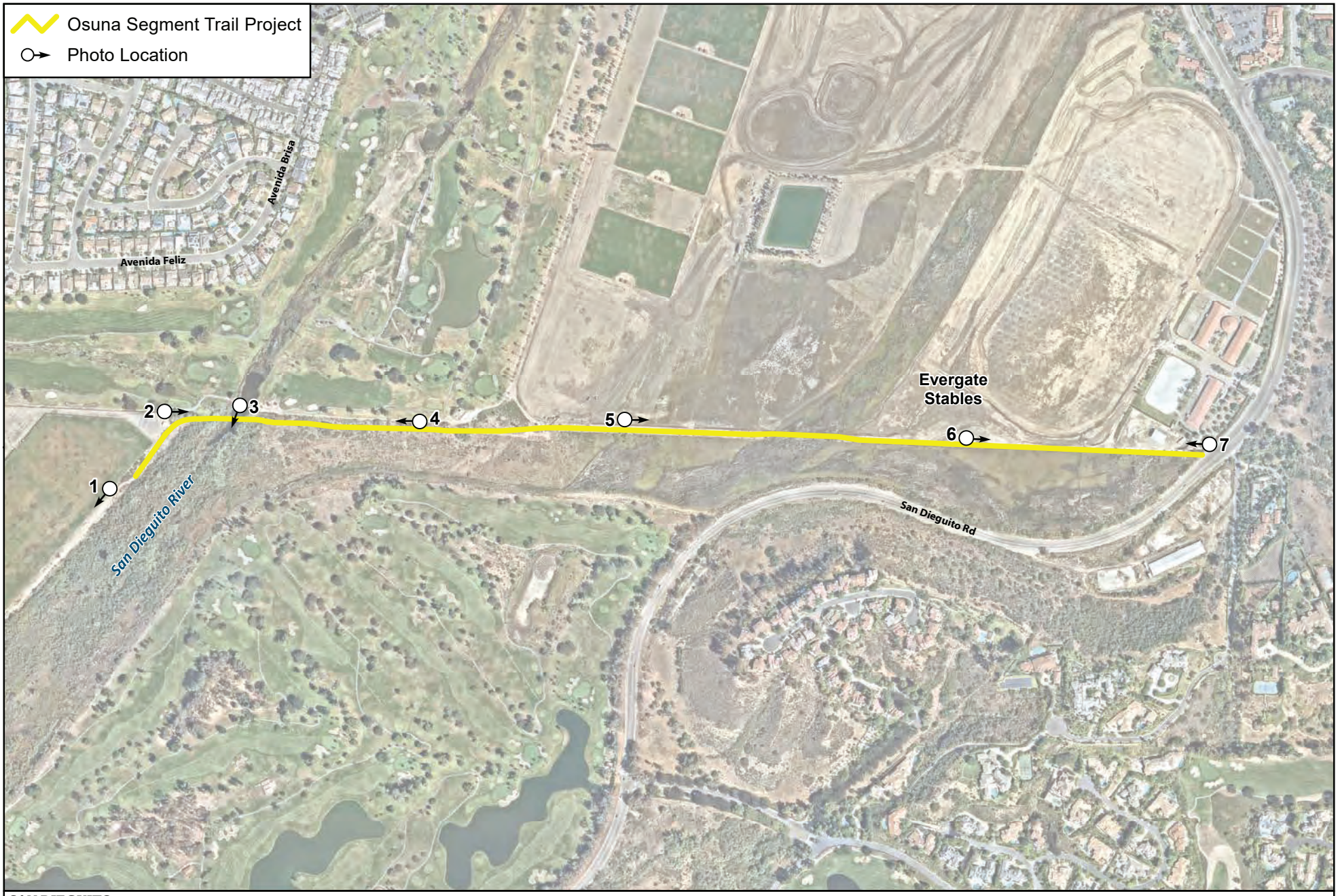
SAN DIEGUITO RIVER PARK

Source: Dudek 2023; Aerial Photo: Kimley-Horn 2021

Figure 9

OSUNA SEGMENT OF THE COAST TO CREST TRAIL

Impacts to Biological Resources Map - View 5



SAN DIEGUITO RIVER PARK

N
W E
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0 300 600
Feet

Source: Kimley-Horn; Aerial Photo: Maxar, Esri 2022

Figure 10

OSUNA SEGMENT OF THE COAST TO CREST TRAIL

Photographic Key Map

• Facing southwest towards the existing CTC trail of Surf Cup Sports lease adjacent to grass field (on right).

• Osuna trail segment would connect to this segment of Coast to Crest Trail.

Photo 1

SAN DIEGUITO RIVER PARK

Figure 11

OSUNA SEGMENT OF THE COAST TO CREST TRAIL

Photo 1

Photo 2

• Facing east towards the San Dieguito River and proposed trail brige crossing.

Photo 3

• Looking south at San Dieguito River as it flows downstream from the project site.
• The proposed bridge would cross over the river, spanning the river channel.

SAN DIEGUITO RIVER PARK

Figure 12

OSUNA SEGMENT OF THE COAST TO CREST TRAIL

Photos 2 and 3

Photo 4

- Views facing west towards San Dieguito River crossing.
- Stakes in foreground show future trail alignment.

Photo 5

- Facing east toward trail easement. The proposed trail would continue east along the existing maintenance road (visible in the photo) on a 12-foot wide trail easement to San Dieguito Road.

SAN DIEGUITO RIVER PARK

Figure 13

OSUNA SEGMENT OF THE COAST TO CREST TRAIL

Photos 4 and 5

Photo 6

• Facing east towards San Dieguito Road on maintenance road.
• The trail would be located on the maintenance road and avoid the cattail stand.

Photo 7

• Facing west from the project terminus at San Dieguito Road.
• The trail would follow the southern fence line (left side of photo) along the existing maintenance road.
• A gate that automatically opens and closes for park hours of operation would be placed at the terminus.

SAN DIEGUITO RIVER PARK

Figure 14

OSUNA SEGMENT OF THE COAST TO CREST TRAIL

Photos 6 and 7

Site-specific biological surveys were conducted in the project area in accordance with the City of San Diego Guidelines for Conducting Biology Surveys (revised 2002, updated 2012). The area surveyed totaled approximately 24 acres, consisting of the project site and surrounding area. Habitat within the study area was assessed for suitability to support previously documented and potentially occurring sensitive plant and animal species including Ridgway's rail (*Rallus obsoletus levipes*) and least Bell's vireo (*Vireo bellii pusillus*). In addition, incidental sightings of wildlife species were recorded. Biologists also observed and recorded wildlife and wildlife sign and categorized the potential for occurrence of listed or sensitive plant and wildlife species.

Existing Cultural Resources Conditions

San Diego County has more federally recognized tribes than anywhere else in the United States with 18 tribes on 18 reservations and the traditional cultural boundaries between the Luiseño and Kumeyaay Native American tribal groups have been well defined (CSP 2009, as cited in Dudek 2021). In 1769, the Kumeyaay national territory started at the coast about 100 miles south of the Mexican border (below Santo Tomas) north to the coast at the drainage divide south of the San Luis Rey River including its tributaries. The project area is considered a Tribal Cultural Resource.

A records search and pedestrian site survey were conducted in the project area in July 2021, which revealed one cultural resource previously documented (a utility power line), but no new resources. See Appendix B, *Resource Inventory Report for The Osuna Trail*, for a thorough description of the area's cultural resources.

Project Details

The Project extends 0.3 miles (1,660 feet) along the northern boundary of the Fairbanks Ranch Country Club leasehold on property owned by the City of San Diego and for another 0.6 miles (3,275 feet) along a private property to San Dieguito Road (Figure 4). The Project is a 1-mile-long trail that consists of a new DG trail (0.3 miles), a 140-foot-long by 12-foot-wide prefabricated steel truss bridge crossing over the San Dieguito River, and an improved trail surface along an existing dirt maintenance road (0.6 miles) to San Dieguito Road. The trail segment, like the rest of the CTC Trail, would be multi-use for hikers, bicyclists, and equestrians.

The Project area includes the east/west jurisdictional boundary between the City of San Diego jurisdiction and unincorporated County jurisdiction. The proposed trail crossing over the San Dieguito River is located within the City jurisdiction on open space property owned by the City and leased to the Fairbanks Ranch Country Club. The eastern property, where the proposed trail segment would link to San Dieguito Road, is private property (aka Evergate Stables). The proposed trail will be placed on an existing dirt road on the private property. An easement for the trail has been secured by the JPA for this use. The private property is within unincorporated County jurisdiction. The Project site is near but avoids the Morgan Run Country Club and Resort property to the north. None of the study area is within the coastal zone.

The CTC Trail is planned to continue northeast along the planned San Dieguito Road Pathway, as identified in the San Dieguito Community Plan. The Osuna segment of the Coast to Crest Trail will connect to the future pathway but the pathway is not part of this project.

Trail Alignment

A key photo map and photographic depictions of the project area are shown in Figure 10 through Figure 14. Additionally, the proposed project plans are included in Appendix C, *Plan Sheets, Osuna Segment of the Coast to Crest Trail Project Preliminary* (sheets 3 through 7). Starting from the west end of the Project adjacent to the Surf Cup Sports fields the proposed trail would extend onto the northwest

side of the San Dieguito River (Figure 11, photo 1). The trail would cross over the San Dieguito River on a proposed 150-foot-long by 12-foot-wide prefabricated steel truss bridge (Figure 12, photo 2 and 3, and Appendix C, sheet 3 of 18). The trail would then continue east along City of San Diego property and then within an existing trail easement and terminate at San Dieguito Road (Figure 13 through Figure 14, photos 4 through 7). The Osuna Trail Segment would be placed in previously disturbed areas along an existing raised berm and maintenance road and would be designed to avoid and minimize impacts to native habitats.

The proposed trail width would measure between 6 and 8 feet within a temporary 8- to 10-foot construction corridor (Appendix C, sheets 3 through 7). The new trail is sited on an existing berm (raised filled area) adjacent to the river. Vegetation would be cleared to create the trail. The trail surface would be compacted native soil or decomposed granite. The new trail along the raised berm would connect directly to the dirt road on the private property (Evergate Stables), see Figure 14, photo 7. The trail may be raised by 6 to 12 inches, as needed, along the existing dirt road to create an even and firm trail tread. No paving is proposed.

Lodge-pole fencing (Appendix C, sheet 3 of 18) would be used to define the trail and discourage/restrict access to nearby environmentally sensitive areas. Additionally, a 6-foot-tall black vinyl fence would be installed along the northern perimeter of the private property section of the proposed trail to separate the trail from the rest of the property and to prohibit trespass (refer to Appendix C, plan sheets). The existing wood and wire fencing on the south side of the property (refer to Appendix C, plan sheets) would be maintained as the new trail's south boundary. This fence also protects the adjacent wetlands. Bollards and/or a self-closing gate would be installed at the point where the trail meets San Dieguito Road (future pathway). Periodic access to the dirt road for the property owner and utilities would be maintained as needed through controlled gates. Specific fence placement would be made by JPA park rangers during construction and coordinated with the private property owner. Signage would also be placed along the trail to identify wayfinding and park rules. An educational interpretive sign would be placed along the trail as well, most likely near the bridge.

Trail Access and Parking

Existing trail access for the public is provided along the Coast to Crest Trail and parking is available at the existing San Dieguito Lagoon Staging Area (approximately 60 spaces) located 2 miles to the west on San Andres Drive (Figure 3). A trail staging area is also provided on San Dieguito Road (called Black Mountain/Lusardi) approximately 3 miles to the north that will provide additional access to the CTC Trail when the San Dieguito Road Pathway project is completed. No additional trail parking is proposed as part of this project. Non-vehicular trail access for walkers and bicyclists would be available from San Dieguito Road at the east end of the proposed trail.

Prefabricated Steel Truss Bridge

This bridge type provides an attractive appearance and is commonly used for pedestrian bridges. This same design was used for another segment of the CTC Trail (Del Dios Gorge) further east (**Figure 15**). Rather than constructed on site, the steel truss bridge is prefabricated off site and transported to the construction site. Erection of the bridge is possible during a single daytime work shift, which minimizes construction time at the site. Below-ground concrete abutments would support the bridge structure and no piers or supports are necessary in the river (**Figure 16** to **Figure 18**). The steel members would be painted or exposed with self-weathering steel to protect the bridge during anticipated flooding events.

An integral metal railing will line both sides of the bridge providing a safety railing for all users including equestrians. The bridge deck will be surfaced with timber planking like other trail bridges on the CTC Trail. Removeable bollards, to prevent unauthorized vehicles from accessing the bridge, would be placed

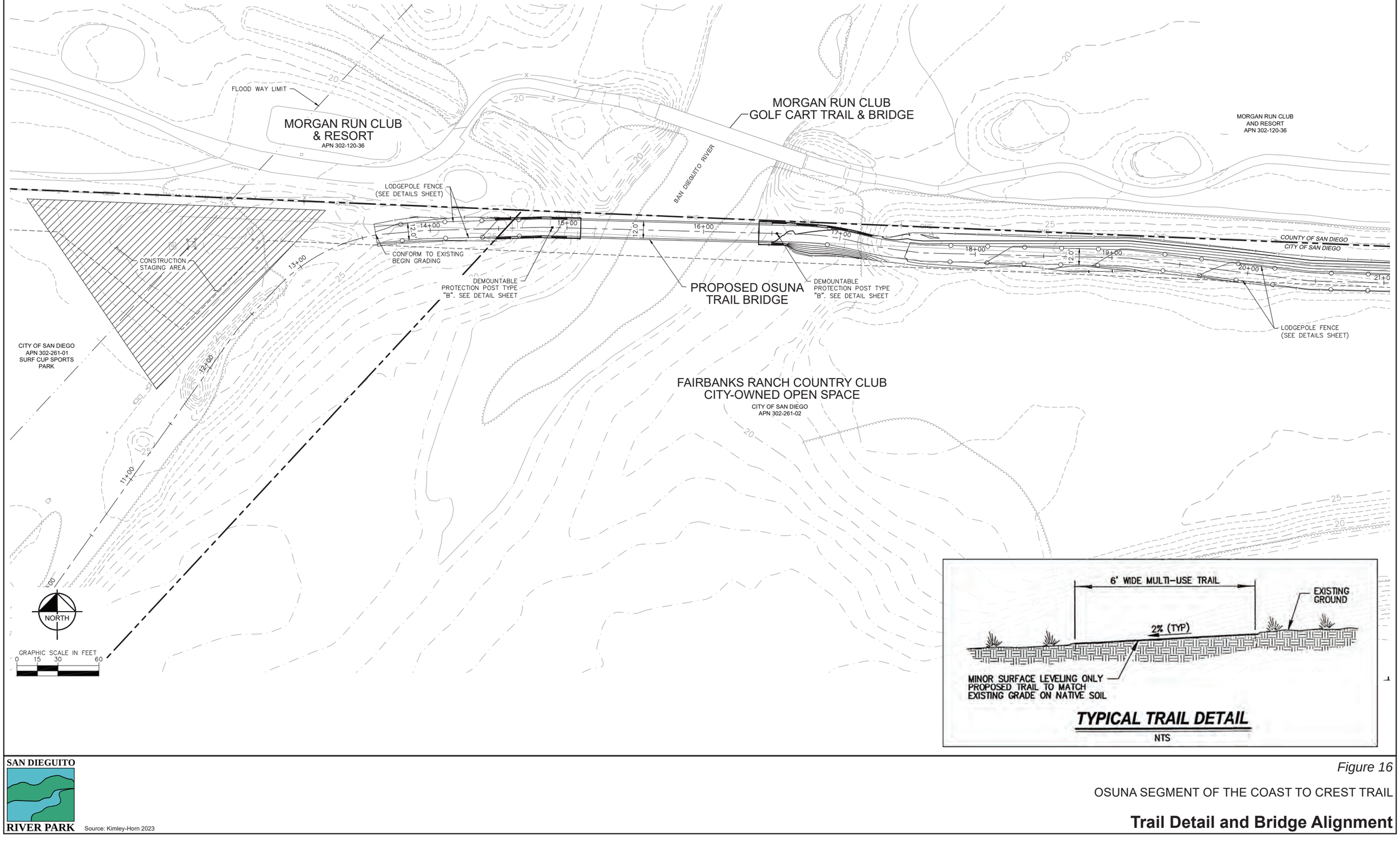
Del Dios Bridge

SAN DIEGUITO
RIVER PARK

Figure 15

OSUNA SEGMENT OF THE COAST TO CREST TRAIL

Del Dios Bridge Photo



TYPICAL TRAIL DETAIL

NTS

SAN DIEGUITO RIVER PARK

Source: Kimley-Horn 2023

Figure 16

OSUNA SEGMENT OF THE COAST TO CREST TRAIL

Trail Detail and Bridge Alignment

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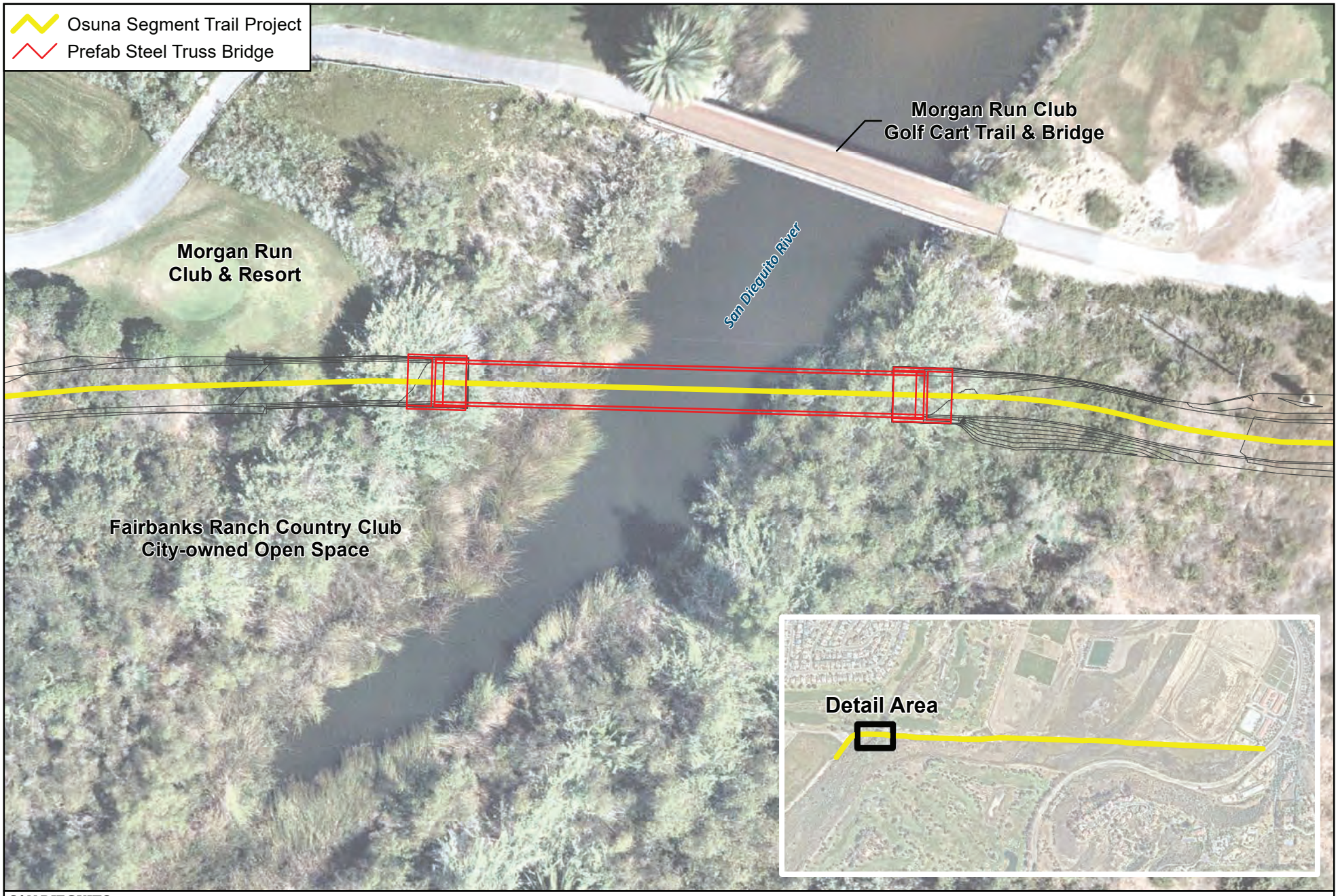


SAN DIEGUITO RIVER PARK

N
W E
S

0 20 40
Feet

Source: Kimley-Horn; Aerial Photo: Maxar, Esri 2022

Figure 17

OSUNA SEGMENT OF THE COAST TO CREST TRAIL

Prefab Steel Truss Bridge Location

at the center of the trail on one or both sides of the trail bridge. Decorative pylons or pilasters may also be used at the bridge entrances to enhance the aesthetics. Trail fencing will be used at both approaches to prevent users from entering the river channel. Engineering studies completed for the project determined it would be infeasible to span the entire 100-year floodplain with a bridge due to the floodplain width of over 1,000 feet in the project area (Kleinfelder, 2015). The proposed bridge would span the main river channel. The main channel conveys local drainage flows and small storm events (up to 10-year storms); larger storm events overtop the channel banks and expand over the wide floodplain (Kleinfelder, 2015). The bridge structure is designed to withstand storms and flood events without affecting upstream water surface elevations and will convey river flows during 1- to 10-year storms (with 1.05 feet of freeboard) and overtop during larger storm events (Draft Hydrology and Hydraulic Analysis March 2023).

Construction Methods

Project site access points and a construction staging area are located to the west on a level area adjacent to the existing trail (Figure 4). The use of heavy construction equipment would be minimal and avoid habitat areas. Construction vehicles and equipment would enter on Via de la Valle at an existing driveway entrance and utilize the existing access road on the adjacent property (Surf Cup) to access the bridge site. The staging area is located on a previously disturbed open area near the west side of the proposed bridge away from the designated habitat areas. A smaller staging area may also be used on the east side closer to San Dieguito Road utilizing the existing dirt maintenance road. The project would generate approximately 1,480 construction trips (based on a construction buildout of seven months).

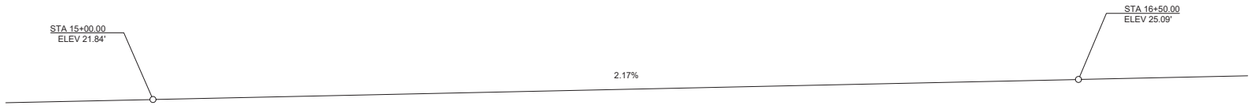
Project construction would be performed by a bridge contractor, San Dieguito River Park rangers, supervised work crews, and trained and skilled volunteers. It is anticipated that the Project would be built over a one-year period. Initial trail clearing would be conducted using a small tractor with a scraper and final grades would be completed using hand-held equipment. The trail tread would be compacted soil amended with D.G. or other material (e.g., gravel base) as needed for stability and proper drainage. The entire project site is level. Minor out-sloping of the trail would facilitate drainage into the adjacent vegetation. Lodge-pole fencing would then be added along the trail as well as trail gates/bollards and signs.

The foundations/footings for the bridge would be excavated and poured below grade on both sides of the river. The steel truss bridge would be fabricated off site and transported to the construction site in segments on a flatbed truck. Once at the site the bridge would be assembled at the staging area and placed over the river on the abutments with a crane. This construction method minimizes noise and construction activities at the site and can be done in less than one week.

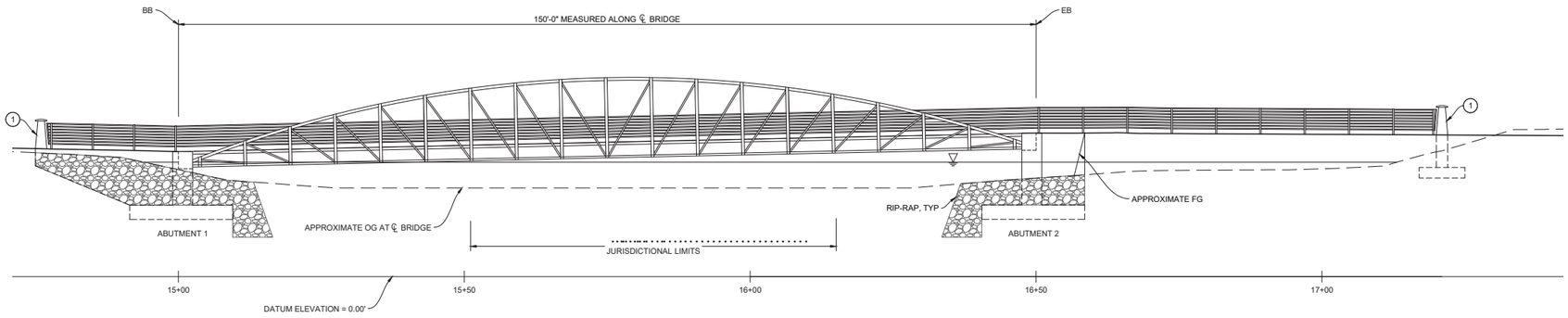
Once the bridge and trail are constructed, native revegetation of temporarily impacted areas would occur including soil preparation, planting, and watering.

Trail Operation and Maintenance

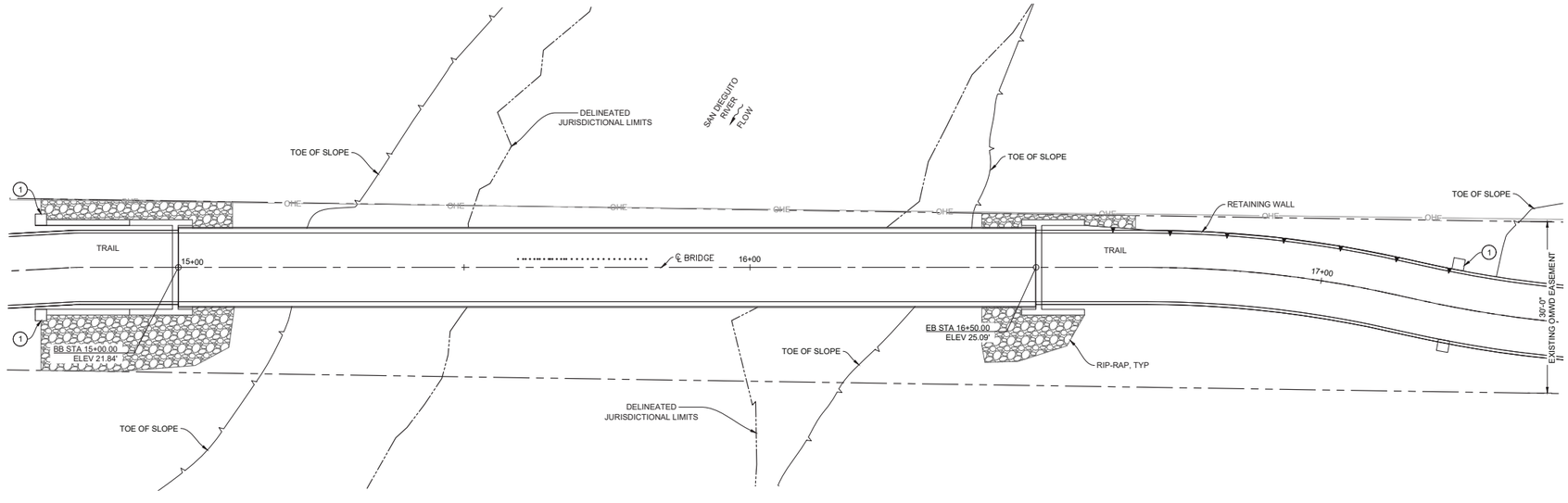
The San Dieguito River Park JPA will be responsible for management and maintenance of the trail and bridge in accordance with the JPA's Trails Management Plan and Standards (2016) as is done for other segments of the Coast to Crest Trail. The JPA employs professional and experienced park rangers to perform all maintenance. Trail maintenance includes litter removal, weeding, maintaining the trail surface, patrolling, and fence repair, as needed. Bridge repair and cleaning would also be done as needed. During trail patrols, rangers conduct regular maintenance tasks including servicing waste receptacles (trash cans), repairing trail fencing and gates, and maintenance of other items such as signage, kiosks, etc. Rangers also interact with the public, enforce park rules, and check for damage on the trail. Trained and dedicated trail patrol volunteers also provide additional support to the rangers. The trails within the SDRP are routinely closed during rain events and flooding for public safety and to minimize damage to trail tread. The Osuna trail segment would be closed during large rain events when the trail and/or bridge surfaces are flooded. The trail and bridge are designed to withstand major flood events.



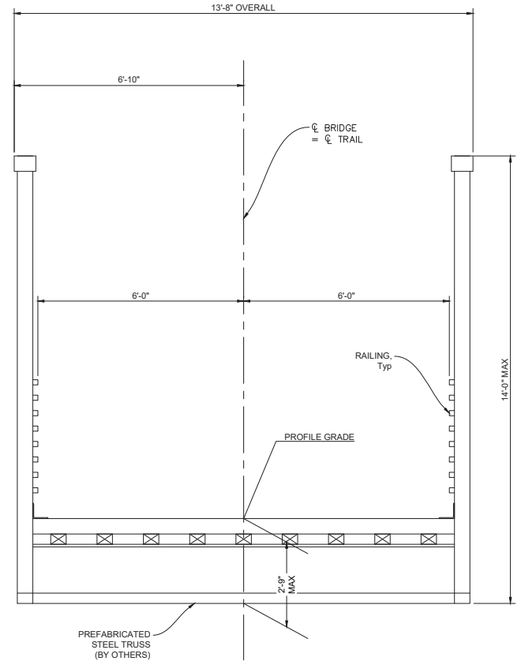
PROFILE GRADE
NO SCALE



ELEVATION
1" = 10'-0"



PLAN
1" = 10'-0"



TYPICAL SECTION

SAN DIEGUITO RIVER PARK

Source: Kimley-Horn 2023

Figure 18

OSUNA SEGMENT OF THE COAST TO CREST TRAIL

Prefab Steel Truss Bridge

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9. Surrounding Land Uses and Setting

See description provided above, under Existing Site Conditions.

10. Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

It is anticipated that the Project will require approval from the following public agencies to implement; California Fish and Wildlife (Section 1602 Streambed Alteration Agreement), the City of San Diego (Site Development Permit and Grading Permit, easement), the Regional Water Quality Control Board (Section 401), United States Fish and Wildlife Service (Section 7 Endangered Species Act), and the United States Army Corps of Engineers (Section 404 Permit). A joint use agreement with the Olivenhain Municipal Water District will also be required.

11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

In accordance with Assembly Bill 52 (AB 52), including Section 21080.3.1(d), JPA staff circulated letters on March 26, 2021, to the local tribes who have expressed interest in receiving project notifications on JPA proposed projects. Individual letters were sent via email and U.S. Postal Service to the San Luis Band of Mission Indians, the Rincon Band of Luiseno Indians, and the San Pasqual Band of Mission Indians to request comments and input on the Project and the potential to affect tribal cultural resources. The City of San Diego initiated additional consultation via written correspondence to the Jamul Indian Village and the Iipay Nation of Santa Isabel. Letters were sent to the Tribes on January 23, 2023.

The JPA received a response letter from the San Pasqual Band of Mission Indians dated April 26, 2021, requesting consultation in the development of avoidance, minimization, and/or mitigation measures and also requesting access to cultural resource reports with respect to the proposed project. The JPA did not receive responses from the Jamul Indian Village, the Iipay Nation of Santa Isabel, San Luis Band of Mission Indians nor the Rincon Band of Luiseno Indians. JPA staff met with a San Pasqual Band of Mission Indians representative at the project site to review the proposed project. Avoidance and minimization measures for tribal cultural resources were discussed and are incorporated in the project and JPA staff will continue to coordinate and consult with the Tribe as the Project proceeds. See Section XVIII, *Tribal Cultural Resources*, for further details.

1.2 Environmental Factors Potentially Affected

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology/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	☐ Tribal Cultural Resources
☐ Utilities and Service Systems	☐ Wildfires	☐ Mandatory Findings of Significance

1.3 Determination

On the basis of this initial evaluation:

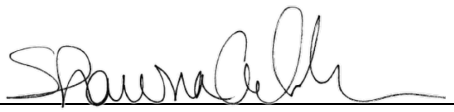
☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ 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 the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ 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 DECLARAION 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, nothing further is required.



Signature	Date
Shawna Anderson, AICP	San Dieguito River Park JPA
Printed Name	For

May 4, 2023

2. Initial Study Checklist

The lead agency has defined the column headings in the environmental checklist as follows:

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 Impact with Mitigation Incorporated" applies where the inclusion of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less-than-Significant Impact." All mitigation measures are described, including a brief explanation of how the measures 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 does not create an impact that exceeds a stated significance threshold.

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).

   The explanation of each issue identifies the significance criteria or threshold used to evaluate each question; and the mitigation measure identified, if any, to reduce the impact to less than significance. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration [CEQA Guidelines Section 15063(c)(3)(D)]. Where appropriate, the discussion identifies the following:

   a) Earlier Analyses Used. Identifies where earlier analyses are available for review.

   b) Impacts Adequately Addressed. Identifies which effects from the checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and states whether such effects were addressed by mitigation measures based on the earlier analysis.

   c) Mitigation Measures. For effects that are "Less Than Significant with Mitigation Incorporated," describes the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

2.1 Environmental Analysis

A project-level evaluation of all environmental issue areas for the proposed project is provided in this section. The CEQA checklist indicated that two environmental issues; biological resources and tribal cultural resources, required a detailed analysis and evaluation. A detailed analysis for these issues is provide below.

2.2 Discussion of Environmental Impacts

I. Aesthetics

Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐

Although the Project is near two public roadways (Via de la Valle and San Dieguito Road), views of the site from these roadways are hidden due to distance and thick vegetation. The site which includes views of the San Dieguito River and surrounding open space is visible from the private Morgan Run Country Club and Resort and would be visible to trail users once constructed. The project would extend a public trail in an area that is not currently accessible to the public. Existing scenic views of the San Dieguito River and surrounding open space would not be adversely affected by the proposed trail development.

The terrain is mostly level thus very little grading would be necessary. Design techniques listed in the design guidelines of the San Dieguito River Park Concept Plan would be utilized to minimize disturbance and grading of the natural terrain. These techniques include using existing paths where feasible, minimizing grading and following natural contours, and using native plants to revegetate any areas temporarily disturbed by construction activities. The trail would be surfaced with decomposed granite (no paving would occur) and lodgepole fencing would be used as needed.

The one element of the project that would alter a view is the proposed 150-foot-long by 12-foot-wide trail bridge. The bridge would be visible to trail users and nearby private properties. The trail bridge design is visually compatible with the surrounding area with the use of non-glare materials and neutral colors similar to other trail bridges in the area. The design would be similar to other segments of the CTC Trail and compatible with the surrounding open space and recreational uses. Therefore, impacts would be less than significant.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒

No state scenic highways are located in proximity to the project site. The nearest state scenic highway is SR 78 located approximately 33 miles northeast of the site (Caltrans 2023). The project would not remove or damage any trees or scenic resources. Although some native and non-native vegetation would be removed to construct the bridge supports and the trail, land disturbance would be kept to a minimum and removed vegetation would be replanted with native vegetation (except for the trail tread) consistent with the design guidelines in the Concept Plan. The bridge would span the entire river channel and no supports would be placed in the river. As such, no impacts would occur.

c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☐	☒

The site is not visible from a publicly accessible vantage point. The project is located in a suburban type setting with surrounding recreational and private open space uses including Morgan Run Golf Course and would not substantially degrade the existing visual character or quality of these existing views. The project would be visually compatible with the existing surrounding recreational uses. The trail would be built according to the design guidelines contained in the San Dieguito River Park Concept Plan, which require that grading be minimized and temporarily disturbed areas during construction be revegetated only with native plant species. The open space zoning in the area allows passive recreational use as proposed. No impacts would occur and no mitigation is required.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☐	☒

No lighting is proposed for the trail and non-glare materials would be used for the bridge. The trail is not open at night and the trailhead parking area, approximately 2 miles west of the site, is gated and closed after dark. Thus, the project would not be a source of light and glare. No impacts would occur.

II. Agriculture and Forestry Resources

Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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?	☐	☐	☐	☒

Per the State of California Department of Conservation Farmland Mapping & Monitoring Program, the project site is not located within an area designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The Project site is zoned as open space and agriculture. Therefore, no impacts to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance would occur with project development.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒

The Project site is located within two jurisdictions, the City of San Diego and the County of San Diego. The Project site zones are predominantly within the OF-1-1 zones (City) which allow for the proposed use. The private property is zoned as AR-1-1, AR-1-2. The Project site and surrounding area does not contain agricultural uses nor land under a Williamson Act contract; therefore, no impacts would occur in this regard.

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))?	☐	☐	☐	☒

The project site is not zoned for timberland or other forestry uses and does not contain timberland or forest land; therefore, no impacts would occur.

d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒

No forest land exists on or near the site; therefore, no impacts would occur.

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?	☐	☐	☐	☒

The project site does not contain farmland or forest land. No farmland exists on or near the site. The project would not result in any conversion in farmland; therefore, no impacts would occur.

Mitigation Measures

No mitigation is necessary.

III. Air Quality

Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒

San Diego County is currently designated as a nonattainment area for the Federal standards for ozone (O_3) as well as the State standards for O_3, particulate matter less than or equal to 10 microns (PM_{10}), and particulate matter less than or equal to 2.5 microns ($PM_{2.5}$). The Regional Air Quality Strategy (RAQS) and the San Diego region's portion of the SIP are the region's plans for attainment and maintaining air quality standards. The RAQS rely on information from the California Air Resources Board (CARB) and the San Diego Association of Governments (SANDAG), including projected growth in the County, and all other source emissions to project future emissions and determine the strategies necessary to reduce stationary source emissions through regulatory controls. Projects that propose development that is consistent with the land use designations and growth anticipated by the local general plans and SANDAG are, by definition, consistent with the RAQS and SIP. The proposed project does not propose any changes to existing or planned land uses that would facilitate unplanned growth; thus, the proposed project is consistent with the region's adopted growth projections and air quality standards. Because the proposed project includes development that is consistent with the planned uses for the site, the proposed project would not conflict with or obstruct implementation of the RAQS or SIP; therefore, no impacts would occur.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☐	☒

San Diego County is currently designated as a nonattainment area for ozone (O_3) as well as the State standards for O_3, particulate matter less than or equal to 10 microns (PM_{10}), and particulate matter less than or equal to 2.5 microns ($PM_{2.5}$). The proposed project extends a planned non-vehicular mode of travel and would not directly contribute pollutants. It is estimated that an average of up to approximately 100 vehicle trips per day or less may be generated by the availability of a recreational opportunity. However, the proposed trail is not a new independent trail and rather extends the existing CTC Trail by 1 mile. Trail users would park at one of the nearby existing staging areas to access the trail. These recreational trips would likely occur regardless of the construction of this project (i.e., to access the existing CTC Trail or other recreational facilities in the County). This small number of trips is not expected to violate any air quality standards. No cumulative net increase in criteria pollutants would occur with project development.

c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☐	☒

Air quality regulators typically define sensitive receptors as schools (Preschool–12th Grade), hospitals, resident care facilities, or day-care centers, or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The County of San Diego also considers residences as sensitive receptors because they house children and the elderly.

The proposed project extends a planned non-vehicular mode of travel and would not directly contribute pollutants. No sensitive receptors have been identified within 0.25 miles (the radius determined by the South Coast Air Quality Management District [SCAQMD] in which the dilution of pollutants is typically significant), although the Surf Cup Sports host soccer tournaments on their outdoor fields is adjacent to the project site. The proposed use is non-vehicular and no pollutants would be generated from its operation. The proposed use is non-vehicular and no pollutants would be generated from its operation. Construction would be short-term and of a short duration during certain construction activities and not to a degree that would be harmful. Construction operations would include standard measures as required by City of San Diego grading permit to limit potential air quality impacts; therefore, no impacts would occur.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☐	☒

According to CARB's Air Quality and Land Use Handbook, typical sources of emissions leading to odors include sewage treatment plants, landfills, livestock operations, and recycling facilities, among other uses. The proposed project does not include any uses that would generate odors.

The proposed project extends a planned non-vehicular mode of travel and would not directly contribute pollutants. Construction of the proposed project may produce short-term discernible odors typical of most construction sites, such as exhaust from construction equipment.

The effects of any small generation of objectionable odors would be localized to the immediate area and would not result in a cumulatively considerable impact; therefore, no impacts would occur.

Mitigation Measures

No mitigation is necessary.

IV. Biological Resources

Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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?	☐	☒	☐	☐

A detailed project-level analysis of biological resources and impacts is provided in Appendix A, which provides the *San Dieguito River Park Osuna Segment of the Coast to Crest Trail Project Biological Technical Report* (BTR). The information below is a summary from the BTR.

Vegetation Impacts Summary

Approximately 1,660 feet of the total 1-mile-long, 6- to 8-foot-wide trail would be new construction. The remainder of the trail is sited on an existing unpaved maintenance road and would not directly impact any vegetation. The bridge and new trail would impact vegetation by permanently removing vegetation to accommodate the footprint of the bridge abutments and new trail surface, and by temporarily removing vegetation within the construction work area. The project design follows the design guidelines in the Concept Plan including placing 0.6 miles (3,275 feet) of the trail on an existing dirt road, placing new trail on the most disturbed areas of the site, and using a bridge to cross/span the river and placing bridge infrastructure and abutments outside of sensitive habitat thereby minimizing impacts to biological resources. The areas temporarily impacted from construction activities would be replanted and restored to native habitat.

Table 1 lists the direct vegetation impacts from the proposed project. Direct Impacts may include both the permanent loss of on-site habitat and the plant and wildlife species that it contains, as well as the temporary loss of on-site habitat. Direct impacts would occur as a result of grading for the trail and installation of the abutment.

The direct impacts that were quantified include the new trail and bridge abutments as permanent impacts and areas temporarily impacted from construction grading but replanted and restored to native habitat as part of the project design as short-term impacts.

In summary, of the total 1.635 acres of permanent impacts to all vegetation types and land covers, 0.470 acre are impacts to coastal sage scrub and 0.643 acre are impacts to wetland vegetation (i.e., native and non-native wetlands), while the remaining 0.992 acres of impact are to developed/disturbed/ornamentals areas. The total net permanent impact to native vegetation (i.e., upland and wetland vegetation) equals 0.53 acre.

Areas (fill slopes) that are temporarily disturbed from construction of the trail will be restored in place and will account for 0.242 acres of all vegetation types and land covers. Of that amount, 0.161 acres of coastal sage scrub and 0.008 acres of wetland vegetation will be restored in place. In addition, 0.073 acres of impacts to non-native and disturbed areas from grading will be revegetated to native coastal sage scrub and wetland vegetation. Impacts to sensitive vegetation communities would be considered significant but will be mitigated for through onsite restoration and enhancement, therefore reducing the impacts to a less-than-significant level.

Table 1 Direct and Indirect Impacts to Vegetation Communities and Land Cover Types in the Project Site

			Impact Type			
Vegetation Community/Land Cover Type	**City of San Diego Biology Guidelines Vegetation Community[a]**	**Subarea Plan Tier**	**Bridge Shading (indirect impact)**	**Abutment and Trail (direct impact)**	**Grading of Slopes (direct impact)**	**Total**
Upland Vegetation Communities						
Coastal Sage Scrub	Coastal Sage Scrub	II	—	0.309	0.161	0.470
Wetland Vegetation Communities						
Freshwater Marsh	Freshwater Marsh	Wetland	0.003	0.021	—	0.024
Coastal Salt Marsh	Salt Marsh	Wetland	—	0.011	—	0.011
Mulefat Scrub	Riparian Scrub	Wetland	—	0.005	0.008	0.013
Southern Willow Scrub	Riparian Scrub	Wetland	0.004	0.012	—	0.016
Open Water	Natural Flood Channel	Wetland	0.020	—	—	0.020
Subtotal Wetlands			*0.027*	*0.049*	*0.008*	*0.084*
Non-Native Vegetation Communities and Land Covers						
Developed Land	Disturbed Land	N/A	—	0.843	—	0.843
Disturbed Habitat	Disturbed Land	IV	—	0.037	0.010	0.047
Ornamental	Disturbed Land	IV	—	0.068	0.034	0.102
Arundo-Dominated Riparian	Disturbed Wetlands	Wetland	0.011	0.023	0.001	0.035
Non-native Riparian	Disturbed Wetlands	Wetland	0.003	—	—	0.003
Tamarisk Scrub	Disturbed Wetlands	Wetland	—	0.023	0.028	0.051
Subtotal Non-Native and Land Covers			*0.014*	*0.994*	*0.073*	*1.081*
Grand Total			***0.041***	***1.352***	***0.242***	***1.635***[b]

NOTES:

a. Source: City of San Diego 2018a

b. Total impacts when Developed, Disturbed and Ornamental communities (0.992 ac) are deducted equals 0.643 acre of impacts to native and non-native wetlands.

Temporary Impacts

All vegetation temporarily impacted by construction grading that is not part of the trail itself would be restored and revegetated with appropriate native vegetation following project construction. Non-native wetland (such as invasive Arundo), upland habitats, and disturbed areas adjacent to the trail would be enhanced and revegetated with native vegetation. Although trail construction would temporarily impact coastal sage scrub (i.e., side slopes of the trail), the area would be revegetated with native CSS plants. Therefore, the loss of this habitat is not considered to be significant with mitigation incorporated. See mitigation measures section below.

Bridge Shading Permanent Indirect Impacts

Shading from the bridge is considered a permanent indirect impact. In this case the bridge would span primarily over open water, but also over non-native Arundo, non-native riparian, and minor patches of freshwater marsh and southern willow scrub plant communities. However, it is anticipated that vegetation under the bridge will continue to persist because the bridge elevation will be high enough to allow light to reach the vegetation. The bridge may limit some sunlight from reaching the vegetation growing below the bridge, but it is not likely to be detrimental to the native riparian species. Additionally, many riparian species are adapted to low light conditions, often growing under the canopies of taller riparian trees. It should be noted that the non-native vegetation will be removed and replaced with native vegetation as part of the mitigation/revegetation program. Impacts from bridge shading is not considered a significant impact.

Permanent Impacts

Construction of the bridge abutments (i.e., bridge footings) and the trail footprint would result in impacts to coastal sage scrub, wetland vegetation, and non-native vegetation and disturbed/developed areas. Grading of the slopes for the trail would also result in permanent impacts. The project would result in 0.643 permanent impacts to sensitive vegetation communities within the project footprint. Impacts to sensitive vegetation communities would be considered significant but will be mitigated through onsite restoration and enhancement; therefore, impacts would be reduced to a less-than-significant level (see Mitigation section below).

Sensitive Plants

Several recent plant surveys of the area have not detected sensitive species. Additionally, no sensitive plant species were detected within the proposed project impact footprint during project reconnaissance surveys. Based on a review of study area and results from previous surveys, only one species has a moderate potential to occur within the project area: Lewis/evening primrose. Since surveys may have been conducted outside the blooming period, the biology report assumed the species to be present in CSS habitat and impacts to sensitive plants would occur. The project would result in impacts to coastal sage scrub which could have the potential to support Lewis' Evening primrose. However, the loss of this habitat would be less than significant given the low rarity of species and the marginal loss of habitat.

Sensitive Wildlife Species

The Project would have a direct impact on native habitat that supports sensitive wildlife species resulting in the permanent loss of 0.527 acres of potential nesting/foraging habitat for species (Appendix A, BTR Section 6.2.4). The impact on native habitat is considered to be significant since the impact to native habitat exceeds the City thresholds for upland and wetland vegetation communities. However the proposed revegetation and mitigation measures would reduce these impacts to a less-than-significant level.

Indirect Impacts to Sensitive Wildlife

Wildlife may be indirectly affected in the short-term by construction-related noise, which can disrupt normal activities and subject wildlife to higher predation risks. Breeding birds can be significantly affected by short-term construction-related noise, which can result in the disruption of foraging, nesting, and reproductive activities. Indirect impacts from construction-related noise may occur to Ridgway's rail, least Bell's vireo, northern harrier, least bittern, Cooper's hawk, Canada goose, Swainson's hawk, white-tailed kit, California horned lark and yellow warbler if construction occurs during the breeding season (i.e., February 1 through September 15). These impacts would be considered significant. Implementation of the mitigation measures listed below would serve to reduce the impact to a less-than-significant level.

Temporary vegetation impacts from construction activities would be restored to native habitat following project completion. Restoration work would include restoring and enhancing upland habitat (CSS) and non-native riparian habitat within the side slopes of the trail through revegetation with native species. (see Appendix A, BTR Section 6 impact analysis, for details).

Ridgway's rail and least Bell's vireo both have the potential to nest in the wetland habitat adjacent to the trail. Since the proposed project includes construction of a bridge over the river and requires the placement of abutments on either side of the bridge, in addition to trail grading, there is a potential for the project to result in direct impacts to Ridgway's rail or least Bell's vireo should they be present during construction activities. To avoid potential impacts to these species during project construction, minimization measures are required if work is planned adjacent to areas where these species have a moderate or high potential to occur. These measures are listed under the Mitigation Measures section below and would reduce potential impacts to a less-than-significant level.

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 US Fish and Wildlife Service?	☐	☒	☐	☐

The proposed project would have limited permanent impacts to jurisdictional resources resulting from trail and bridge construction (Appendix B, BTR Table 9-11). Project design incorporated measures to minimize impacts when possible. The bridge would completely span the open water of the river with no supports in the river channel. The bridge abutments are designed and sited to fall primarily within non-native riparian, and Arundo-dominated riparian plant communities and would be designed to minimize impacts to adjacent wetland resources and avoid direct impacts to the river. The trail along the private property trail easement (0.6 miles) would avoid all impacts to freshwater marsh and coastal salt marsh vegetation by utilizing an existing maintenance road, rather than creating a new trail and impacting additional wetland habitat nearby.

In total, the proposed project would result in direct impacts to 0.134 acre and indirect temporary impacts to 0.041 acres of City regulated wetlands (**Table 2**). Impacts to wetlands and other regulated resources would be considered significant but would be mitigated by the design measures described earlier in this section (and mitigation measures below). The trail along the Evergate Stables property is designed to avoid impacts to freshwater marsh and coastal salt marsh vegetation by utilizing the existing service access road, rather than encroaching into jurisdictional wetland habitat through that portion of the project.

Implementation of the measures listed below would reduce potential impacts to a less-than-significant level. See the Mitigation Measure section below for further details.

Table 2 Direct and Indirect Impacts to City of San Diego Wetlands in the Project Area

Vegetation Community/Land Cover Type	Impact Type			
	Bridge Shading (indirect impact)	Abutment and Trail (direct impact)	Grading (direct impact)	Total
Wetlands/ Riparian Habitat				
Arundo-Dominated Riparian (under combined agency & City jurisdiction)	0.001	0.010	0.001	0.012
Coastal Salt Marsh	—	0.011	—	0.011
Freshwater Marsh	0.003	0.021	—	0.024
Mulefat Scrub	—	0.005	0.008	0.013
Non-native Riparian	0.003	—	—	0.003
Southern Willow Scrub	0.004	0.012	—	0.016
Tamarisk Scrub	—	0.023	0.028	0.051
Subtotal	*0.011*	*0.082*	*0.037*	*0.130*
		0.119		
Non-Wetland Waters/Streambed				
Open Water	0.020	—	—	0.020
Arundo-dominated Riparian (under CDFW & City jurisdiction only)	0.010	0.014	0.001	0.025
Subtotal	*0.030*	*0.014*	*0.001*	*0.045*
		0.015		
Total Area	***0.041***	***0.096***	***0.038***	***0.175***

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☒	☐	☐

The CTC Trail alignment through the subject area is constrained by existing land uses in the area and there is limited space for the new trail, which must pass through the project area to connect to the other existing segments of CTC Trail. The San Dieguito River flows adjacent to other existing recreational uses (two private golf courses and soccer fields) and residential areas in the project area. The SDRP Concept Plan and FEIR addresses the CTC Trail through the project area. Impacts to wetlands cannot be completely avoided by the project including wetlands associated with the San Dieguito River and the surrounding transitional upland habitat. However, impacts are minimized to the maximum extent practicable by the design measures incorporated into the project consistent with the Concept Plan guidelines and measures and as explained in this section.

The bridge crossing location was sited at the narrowest part of the river channel and adjacent to degraded wetland habitat to the extent feasible to avoid and minimize impacts to wetlands to the greatest degree possible. Although the bridge would span the river, a small impact would occur to riparian bank from the abutments. The trail is also aligned to cross the most sensitive areas for a shorter distance

(perpendicular to the river) and for a short duration as trail users pass through. The bridge and trail would be sited on mostly disturbed habitat (filled berm) and the existing dirt road. All areas disturbed by construction activities and not part of the permanent project footprint would be revegetated with appropriate native species. In addition, existing exotic/non-native plant species that have previously invaded the existing wetlands would be removed and those areas would be restored and enhanced to the appropriate native plant communities. This would help provide an improved wetland habitat area and additional nesting and foraging opportunities for native wildlife species.

Areas of wetlands that could be subject to physical disturbance by trail users would be protected by confining trail users to the trail (lodge pole trail fencing on both sides) and preventing access to the wetlands. Revegetation along the margins of the trail would help provide a vegetative buffer to the existing habitat. Providing a dedicated trail connection would ensure that the river and other surrounding habitat are not inadvertently degraded by trail users seeking their own way through the area. Implementation of mitigation measures would reduce potential impacts to a less-than-significant level. See the Mitigation Measure section below.

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?	☐	☐	☒	☐

The main habitat linkages within the study area are associated with San Dieguito River, adjacent upland habitat, and wetlands northeast of the project site. Outside of these areas is predominately developed landscapes (golf courses, soccer fields, equestrian stables, housing developments) that likely provide limited refuge and cover for wildlife species and their movements. San Dieguito River provides wildlife habitat and supports wildlife species movement. Large species are likely passing through and moving to more native habitat cover further west at the San Dieguito Lagoon. Wildlife likely also use the open space on the southern half of the study area to move between habitats; yet this natural habitat is bounded on all sides by roads and development and therefore movement is restricted.

Nevertheless, the proposed bridge and trail would not impede or interfere with wildlife movement. The trail is a passive use and is not open or in use at night and would allow (not impede) wildlife movement. Proposed new lodgepole fencing in potential wildlife use areas does not block wildlife passage and would keep trail users out of adjacent habitat areas.

The project would not interfere substantially with wildlife movement and the impact is less than significant.

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐

Compliance with existing environmental regulations and implementation of measures as described in this section would reduce impacts to a less-than-significant level. See Section IV(f).

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?	☐	☐	☒	☐

The Multiple Habitat Preserve Area (MHPA) of the MSCP was designed to include key biological core and linkage areas within the City (City of San Diego 1997). The project area is not within the designated

MHPA and is determined not to be a designated biological core or linkage area. The MHPA boundary occurs approximately 1.3 miles from the Project area and is not adjacent to the Project area. Therefore, impacts are considered less than significant.

Cumulative Impacts

The project area is located within the City of San Diego MSCP Subarea Plan area. The MSCP is a long-term regional conservation plan established to protect sensitive species and habitats in San Diego County. The MSCP is divided into subarea plans that are implemented separately from one another. Within the MSCP area there are focused MHPA areas, however this portion of the San Dieguito River, where the trail and bridge will be located, is not within the MHPA area. The MSCP planning effort is designed to address cumulative impacts through development of a regional plan that addresses impacts to covered species and habitats in a manner that assures their conservation despite cumulative project impacts over the long term. The ultimate goal of the MSCP plan is the establishment of biological reserve areas in conformance with the State of California Natural Communities Conservation Planning Act.

Cumulative impacts to sensitive vegetation communities or sensitive species from implementation of the project are not expected since all activities are located outside of the MHPA and the project would result in minimal impacts to sensitive resources. These impacts would be offset through the restoration/revegetation of on-site disturbed habitat to native vegetation and through enhancement of existing non-native vegetation communities through exotic species removals and revegetation with native species, thus resulting in no-net-loss of sensitive resources. Therefore, the proposed project would not result in cumulative impacts to either sensitive vegetation communities or species.

Mitigation Measures Incorporated into the Project

The project has been designed to be consistent with the Design and Development Standards contained in the San Dieguito River Park Concept Plan. However, additional measures are necessary to mitigate all biological impacts from implementation of the project to a level of insignificance:

Mitigation Measures for Direct Impacts to Vegetation Communities and Jurisdictional Resources

The proposed project would result in impacts to sensitive vegetation communities within the trail alignment. The project includes the following mitigation consistent with the City's Biology Guidelines (City of San Diego 2018a). These measures would mitigate direct impacts to vegetation communities and jurisdictional resources to less than significant.

> **MM-BIO-1: Upland Mitigation.** To compensate for the permanent loss of 0.47 acres of Tier II coastal sage scrub habitat the project will provide onsite restoration/revegetation of coastal sage scrub vegetation, within the side slopes and margins of the trail, as well as within non-native habitat areas. Where disturbed habitat and non-native vegetation (i.e., tamarisk and ornamental vegetation) exist adjacent to the trail, the non-native species will be removed, and the areas will be revegetated and enhanced with native species. A minimum of 0.47 acres of CSS mitigation compensation will be required onsite to compensate for these impacts. The project proposes to restore and enhance 0.47 acres of upland CSS vegetation through exotic species removals and revegetation, which meets the required mitigation acreage.
>
> **MM-BIO-2: Wetlands Mitigation.** To compensate for the loss of 0.132 acres of wetlands, the project will include restoration of the side slopes and margins of the trail, where the trail passes through existing wetlands, through revegetation with wetland and riparian vegetation. In addition, within areas adjacent to the trail, where Non-Native Riparian, Arundo-dominated Riparian and Tamarisk Scrub communities exist, the non-native species will be removed and treated, and the

areas will be enhanced and revegetated with appropriate wetland and riparian vegetation. In total, a minimum of 0.286 acres of wetland mitigation compensation, composed of wetland restoration and enhancement, will occur on site as part of the project to compensate for these impacts. The project will also restore 0.17 acre of wetlands and enhance 0.22 acre of wetlands through exotic species removals and revegetation, for a total of 0.39 acre of wetland mitigation which exceeds the required mitigation acreage of 0.286 acres. The project shall implement the wetland restoration and enhancement program shown on the preliminary landscape planting and irrigation plans, provided in Appendix C.

MM-BIO-3: Installation of Temporary Fencing. To prevent inadvertent disturbance to areas outside the limits of grading, the contractor shall install temporary orange construction fencing, or utilize existing fencing, along the limits of grading.

MM-BIO-4: Installation of Permanent Fencing. To prevent inadvertent disturbance to areas outside the limits of trail over the long-term, permanent fencing shall be installed along the trail as shown on the project construction plans.

MM-BIO-5: Construction Monitoring and Reporting. To prevent inadvertent disturbance to areas outside the limits of grading, all disturbance of native habitat shall be monitored by a biologist during construction. The biological monitor(s) shall be contracted with the JPA to perform biological monitoring during all clearing and grubbing activities and during bridge construction.

The project biologist(s) shall perform the following duties:

a. Attend the pre-construction meeting with the contractor and other key construction personnel prior to clearing and grubbing to provide educational guidelines for work within the sensitive habitat areas. The biologist shall discuss measures to reduce conflict between the timing and location of construction activities with other mitigation requirements (e.g., seasonal surveys for nesting birds).

b. During clearing and grubbing, the project biologist shall conduct meetings with the contractor and other key construction personnel each morning prior to construction activities in order to go over the proposed activities for the day, and for the monitor(s) to describe the importance of restricting work to designated areas and to minimize and avoid harm to, or harassment of, wildlife prior to clearing and grubbing.

c. Review and/or verify the limits of the construction area in the field with the contractor in accordance with the final grading plan prior to clearing and grubbing. Assure that temporary construction fencing demarcating the limits of grading are installed and properly maintained.

d. Supervise and monitor vegetation clearing and grubbing weekly to ensure against direct and indirect impacts to biological resources that are intended to be protected and preserved and to document that protective fencing is in place and intact.

e. Flush wildlife species (i.e., reptiles, mammals, avian, or other mobile species) from any occupied habitat areas immediately prior to brush-clearing activities. This does not include disturbance of nesting birds or “flushing” of state-listed species (i.e., Ridgeways Rail, or other listed species. (see MM-BIO-10).

f. Periodically monitor the construction site to verify that the project is implementing and complying with the project stormwater pollution prevention plan practices: dust control, fiber rolls and silt fencing as appropriate, removal of construction debris and a clean work area,

covered trash receptacles that are animal-proof and weather-proof, and prohibition of pets on the construction site.

g. Prepare and retain monitoring notes for the duration of the proposed project for submittal in a final report to substantiate the biological supervision of the vegetation clearing and grading activities and the protection of the biological resources.

MM-BIO-6: Long-term Five-year Biological Monitoring and Reporting. The long-term establishment of the mitigation revegetation areas shall be monitored by a qualified biologist/habitat restoration specialist. The biological monitor(s) shall be contracted to perform biological monitoring throughout the five-year maintenance and monitoring period. The project biologist(s) shall perform the following duties:

a. Monitor the project bi-monthly during years one and two, and quarterly during years three through five.

b. Monitoring shall include qualitative monitoring based upon visual observations, as well as quantitative monitoring though the use of point intercept transect data collection to record percent cover of native and non-native species within the revegetation areas. Transects shall be taken in all representative mitigation/revegetation areas. The biological monitor shall determine the location, length and quantity of the transects to provide an adequate representation of the site conditions.

c. Results of the monitoring effort shall be documented in annual monitoring reports to be prepared at the end of each yearly monitoring period. The reports shall describe the current site conditions, progress towards achievement of the project's success criteria and performance standards and any remedial measures that might be necessary to help ensure project success.

d. Document the annual success criteria and performance standards in Appendix B, BTR Section 7, MM-BIO-6, Tables 13–15.

e. For all revegetation areas there shall be no invasive plant species present, as described/listed on the most recent version of the California Invasive Plant Council California Invasive Plant Inventory for the project region, throughout the five-year maintenance and monitoring period.

Mitigation Measures for Direct Impacts to Sensitive Wildlife

Direct impacts to habitat for special-status wildlife species identified as having moderate to high potential to occur in the study area (northern harrier, least bittern, Ridgway's rail, least Bell's vireo, San Diego black-tailed jackrabbit, wandering skipper, western spadefoot, orange-throated whiptail, Cooper's hawk, Canada goose, Swainson's hawk, white-tailed kit, California horned lark, yellow warbler, and monarch butterfly) would be reduced through the implementation of upland and wetlands mitigation. In addition, installation of both temporary and permanent fencing would ensure that inadvertent direct impacts to habitat for special-status species would not occur. A biological monitor will be present to ensure that the appropriate measures are adhered to. These measures would reduce impacts to less than significant.

MM-BIO-7: Best Management Practices (BMPs). To avoid indirect impacts, the project shall be required to meet National Pollutant Discharge Elimination System regulations, incorporate appropriate BMPs during project construction, install permanent BMPs per the City's Storm Water Standards Manual, and prepare and implement a Stormwater Pollution Prevention Plan.

MM-BIO-8: Construction Flagging and Environmental Training. All required construction protection measures shall be followed, which includes having a qualified biologist present during construction activities to provide environmental training, supervise flagging of sensitive resources prior to construction as needed, and monitor the project during construction as needed to ensure no unauthorized impacts occur.

Mitigation Measures for Indirect Impacts to Sensitive Wildlife

Proposed project implementation has the potential to indirectly impact sensitive birds (least Bell's vireo, northern harrier, least bittern, Cooper's hawk, Canada goose, Swainson's hawk, white-tailed kit, California horned lark and yellow warbler) nesting or foraging in adjacent habitat areas. Potentially significant indirect impacts from construction noise to wildlife considered special status under the MSCP may occur.

The following mitigation measures would be applied to reduce potential indirect impacts to these special-status wildlife species (i.e., birds) to a level less than significant.

MM-BIO-9: Nesting Bird Survey. To avoid any indirect impacts to the above listed species, construction within 300 feet of suitable habitat, shall occur outside of the breeding season for these species (February 1 to September 15). If construction must occur during the breeding season, a qualified biologist shall conduct a pre-construction survey within suitable habitat to determine the presence or absence of nesting birds in the proposed area of disturbance. The pre-construction survey shall be conducted within 10 calendar days prior to the start of construction activities. The applicant shall submit the results of the preconstruction survey to the City of San Diego's (City's) Development Services Department (DSD) for review and approval prior to initiating any construction activities.

If nesting sensitive birds are detected, a letter report or mitigation plan in conformance with the City's Biology Guidelines and applicable state and federal law (i.e., appropriate follow up surveys, monitoring schedules, construction, and noise barriers/buffers, etc.) shall be prepared and include proposed measures to be implemented to ensure that the disturbance of breeding activities is avoided. The report or mitigation plan shall be submitted to the City DSD for review and approval and implemented to the satisfaction of the City. The biologist, in concert with the City, shall verify and approve that all measures identified in the report or mitigation plan are in place prior to and/or during construction.

If nesting by the above listed sensitive birds is detected, then an appropriate impact avoidance area shall be included in the mitigation plan and this buffer shall be established around the active nest using orange fencing or other clear demarcation method. The radius of this avoidance buffer shall be determined through coordination with the project biologist and authorized by the City's project manager and DSD and shall use orange fencing or other clear demarcation method to define the approved buffer. If none of these sensitive birds are observed nesting during the pre-construction survey then no further mitigation is required.

MM-BIO-10: Least Bell's Vireo Avoidance. Construction within 300 feet of any sensitive riparian areas with suitable habitat may have adverse indirect impacts on least Bell's vireo, if construction occurs during the breeding seasons for this species (March 15 through September 15).

Avoidance of Least Bell's Vireo Take. Prior to the preconstruction meeting, the City's Environmental Designee/Mitigation Monitoring Coordination (ED/MMC) shall verify that Multi-Habitat Planning Area (MHPA) boundaries and the requirements regarding least Bell's vireo, as specified below, are shown on the biological monitoring exhibit and construction plans.

No clearing, grubbing, grading, or other construction activities shall occur during the least Bell's vireo breeding season (March 15 through September 15). If construction activities must be scheduled during the breeding season, the following met to the satisfaction of the ED/MMC:

1. A Qualified Biologist (possessing a valid Endangered Species Act Section 10(a)(1)(a) Recovery Permit) shall survey habitat areas for the presence of least Bell's vireo pursuant to the protocol survey guidelines established by the U.S. Fish and Wildlife Service within the breeding season prior to the commencement of any construction. If least Bell's vireo are not present, then no further monitoring or measures are required. If least Bell's vireo are present, then the following conditions must be met:
    a. March 15 through September 15 for least Bell's vireo, no clearing, grubbing, or grading of occupied habitat shall be permitted. Areas restricted from such activities shall be staked or fenced under the supervision of a Qualified Biologist; and
    b. March 15 through September 15 for least Bell's vireo, no construction activities shall occur within any portion of the site where construction activities would result in noise levels exceeding 60 dB(A) hourly average at the edge of occupied habitat.

The mitigation measures listed above would mitigate all biological resources impacts to a level less than significant.

V. Cultural Resources

Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to 15064.5?	☐	☐	☒	☐

The information in this section is summarized from the project-level Cultural Resources Inventory Report for the Osuna Valley Trail Bridge (Appendix B).

The trail portion of the project would involve minor shallow grading on existing disturbed areas and fill. The bridge supports (abutments) would involve deeper land disturbance that could potentially impact cultural resources if present.

A file search and project site field survey were conducted by a qualified consultant to determine the presence or potential presence of historic resources within the project site (Appendix B, which provides the *Cultural Resources Inventory Report for the Osuna Valley Trail Bridge, San Diego County, California*). A records search from the South Coast Information Center indicated that one cultural resource was previously identified within the Project area of potential effects (APE). The resource is identified as a utility power line that intersects the Project APE but was determined not eligible for designation as a cultural resource of significance. While the resource is within the Project APE it is not within the area of direct impact and would be avoided. A sacred lands file search with the Native American Heritage Commission (NAHC) was conducted yielding negative results.

An extensive pedestrian field survey of the Project APE conducted in July 2021 by qualified archaeologists identified no new cultural resources. Visibility during the survey was moderate in the

western portion to good in the eastern portion of the Project APE. The western half of the project area including the future bridge location was in an area of heavy disturbance consisting of a dirt path and a sandy dune engineered berm. The proposed work would involve a minimal amount of ground disturbance in areas that have been developed between the 1960s and heavily through the 1980s. No further cultural review or monitoring was recommended as construction efforts would be limited to recently disturbed contexts due to previous landscaping and construction efforts. Therefore, no significant resources would be impacted by the Project.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to 15064.5?	☐	☐	☒	☐

See answer to question V.a above.

c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

The project site is not located within or near a formal cemetery and is not known to be located on a burial ground. The project would involve only minor shallow grading that is unlikely to disturb human remains. A Tribal monitor will be present during grading activities per the mitigation measure incorporated into the project (see Section XVIII of this checklist). Impacts would be less than significant.

Mitigation Measures

No mitigation is necessary.

VI. Energy

Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☐	☒

Adherence to Title 24, the Building Standards, California Energy Code, and Green Building Standards would minimize wasteful and inefficient use of energy resources during construction of the project. Additionally, only a minor amount of energy would be used during project construction with typical construction activities over a short time period. Therefore, the proposed project would not result in wasteful, inefficient, or unnecessary usage of direct or indirect energy and no impacts would occur.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

The proposed project is not energy consumptive and would expand a non-vehicular recreational resource in the area and thereby would contribute to energy conservation. The continuation of the use of the proposed project as a recreational site would not result in cumulatively considerable impacts on

applicable State renewable energy plans. The project would not obstruct state or local plans for renewable energy or energy efficiency; therefore, no impacts would occur.

Mitigation Measures

No mitigation is necessary.

VII. Geology and Soils

Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Directly or indirectly cause 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.	☐	☐	☒	☐

A Preliminary Foundation Report was prepared for the proposed project finding that the project is not located within an Alquist-Priolo Fault Zone. No active faults are known to underlie or project toward the site. Therefore, the probability of fault rupture is low. The project bridge design would comply with the seismic requirements of the California Building Code. Implementation of required engineering design and standard construction practices would ensure that the potential for impacts from regional geologic hazards would remain less than significant.

ii) Strong seismic ground shaking?	☐	☐	☒	☐

The project site is located within a seismically active Southern California region and is potentially subject to moderate to strong seismic ground shaking along major earthquake faults. Seismic shaking at the site could be generated by any number of known active and potentially active faults in the region. The closest known active fault is the Rose Canyon fault zone located about 9 miles west-southwest of the site. The City of San Diego Seismic Safety Study map (2008), Geologic Hazard Categories does not identify the project as being in a fault zone. The project site liquefaction is identified as (32) with a low potential. Implementation of required engineering design and standard construction practices would ensure that the potential for impacts would be reduced to an acceptable level of risk. Impacts would be less than significant.

iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒

As described above in section ii, the project may be subject to moderate to strong ground shaking in the event of a major earthquake and is rated low potential for liquefaction. However, the proposed project does not involve the construction of any buildings or other habitable structures that may be especially susceptible to ground failure, including liquefaction. Therefore, no impact is anticipated.

iv) Landslides?	☐	☐	☐	☒

The topography of the project site is characterized as flat with a low manmade berm and does not have the potential for landslides under existing conditions. The proposed project does not involve the construction of any buildings or other habitable structures. In general, the proposed trail alignment would involve minor grading in a flat area that is not susceptible to landslides. No impact would occur.

b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

Construction activities would temporarily expose soils to increased erosion potential although the site is mostly level and not steep. The trail is on top of a previously disturbed man-made berm and on an existing maintenance road. Initial grading of the trail would be the only time there could be erosion when soils are exposed next to river. The trail design minimizes runoff (e.g., compacted trail surface, graded with cross-drain design to limit erosion and direct flow across the trail and into the surrounding native soils), and the trail would be regularly maintained to minimize pollutants (as is other segments of CTC Trail). Operation of the trail would not necessitate use of permanent treatment control BMPs. The project would be required to comply with the City's Storm Water Standards and use appropriate Best Management Practices (BMPs), which would contain exposed soils and ensure soil erosion is minimized to less-than-significant levels. Typical BMPs for trail construction include use of silt fences and fiber rolls to contain soils. All graded surfaces would be compacted for trail use or planted with native species. Therefore, the project would not result in substantial soils erosion or loss of topsoil. Impacts would be less than significant.

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?	☐	☐	☒	☐

See answers to i and iii above. Impacts would be 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?	☐	☐	☒	☐

The Geotechnical Report concluded that a majority of the soil encountered is expected to possess a "low" expansion potential and includes recommendations for soil preparation contained in the project-specific Preliminary Foundation Report (Appendix D, *Foundation Report, Osuna Segment of the Coast to Crest Trail Project*). Project impacts would be less than significant.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒

None of these uses are proposed or needed. No impact would occur.

f) Directly or indirectly destroy a unique paleontological resource site or unique geological feature?	☐	☐	☐	☒

The project would involve minor and shallow grading on existing fill and would not result in impacts to paleontological resources. No impacts to paleontological resources would occur.

Mitigation Measures

No mitigation is necessary.

VIII. Greenhouse Gas Emissions

Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☐	☒

The Project is a non-vehicular recreational use and would extend an existing trail in the area by 1 mile. The trail would be accessible without a car by the local community and connect to a public roadway with pedestrian and bicycle access (bike lanes). Nearby trail parking at the Lagoon Staging Area would provide vehicular access and no new vehicular access is proposed.

Construction activities emit greenhouse gases (GHGs) primarily though combustion of fuels (mostly diesel) in the engines of off-road construction equipment and through combustion of diesel and gasoline in on-road construction vehicles and in the commute vehicles of the construction workers. Smaller amounts of GHGs are also emitted through the energy use embodied in any water use (for fugitive dust control) and lighting for the construction activity. The project would be constructed in accordance with the energy efficiency standards, water reduction goals, and other “green” standards contained in the California Green Building Standards. Light machinery and vehicles that are in the Tier 4 California Air Resources Board and the U.S. Environmental Protection Agency (EPA) standards would be used minimally during construction of the trail mainly for initial scraping to create the trail. Given the nature of trail construction, most of the trail itself would be constructed using small-scale machinery equipment and hand tools that do not generate greenhouse gas emissions. Therefore, greenhouse gas emissions during construction are expected to be minimal.

The project is consistent with the General Plan and zoning designations and with the City of San Diego Climate Action Plan (CAP). Based on the project’s consistency with the City’s CAP, the project’s contribution of GHG’s to cumulative statewide emissions would be less than cumulatively considerable. Therefore, the project does not cause direct and cumulative GHG emissions.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☐	☒

See answer to VIII.a above. The project would not conflict with an applicable plan, policy, or regulation adopted for the purposes of reducing the emissions of greenhouse gasses. Because the project does not conflict with or obstruct the Climate Action Plan, no impact would occur.

Mitigation Measures

No mitigation is necessary.

IX. Hazards and Hazardous Materials

Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, storage, use, or disposal of hazardous materials?	☐	☐	☒	☐

Construction of the project may require the use of hazardous materials (fuels, lubricants, solvents, etc.), which would require proper storage, handling, use and disposal; however, the project would not routinely transport, use or dispose of hazardous materials. The potential use of these materials would be temporary in nature only for duration of the planned construction period), and the project would not routinely transport, use or dispose of hazardous materials. Additionally, these materials would not be stored at the site, nor would vehicle maintenance be done there. Refueling of the construction equipment may be done, but only at the staging area and away from the river and would comply with laws in place. Therefore, the potential impact is considered less than significant.

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?	☐	☐	☒	☐

Use of hazardous materials at the site would be extremely low and of short duration during construction only and would not pose a significant hazard. Project operation does not involve the use of hazardous materials.

The potential to create a significant hazard involving the release of hazardous materials into the environment is considered a less-than-significant impact.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒

The project would not involve the use or transport of substantial amounts of hazardous material and the project would not create a significant hazard to schools in the area. The proposed project is not located within 0.25 miles of an existing or proposed school. No impact would occur.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5, or is otherwise known to have been subject to a release of hazardous substances and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒

The site was evaluated using appropriate databases including the California Department of Toxic Substances Control EnviroStor database (DTSC 2023) which, pursuant to Government Code Section 65962.5, lists Federal Superfund, State Response, Voluntary Cleanup, School Cleanup, Hazardous Waste Permit, and Hazardous Waste Corrective Action sites, and the California State Waterboard's GeoTracker (DTSC 2023), which lists LUFT sites. A LUFT site is undergoing cleanup due to an unauthorized release from an underground storage tank system. According to the EnviroStor and GeoTracker database, there are no listings for the project site. Any development of the project site would be required to comply with all applicable Fire, Building, and Health and Safety Codes, which would eliminate any potential risk of upset. Although the site is located within a 100-year floodplain (FEMA 2019) it would not create a significant risk of upset or hazard to human health and safety.

The proposed project would not create a significant hazard to the public or environment or result in cumulatively considerable impacts related hazardous materials sites.

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 or excessive noise for people residing or working in the project area?	☐	☐	☐	☒

The project site is not located within an airport land use plan or within 2 miles of a public airport or public use airport. Therefore, the proposed project would not result in a safety hazard. No impact has been identified for this issue area.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒

Emergency response and evacuation is the responsibility of the police and fire service providers detailed in Section XV, Public Services. The proposed project would not impair or physically interfere with emergency response or evacuation. No changes to local roadways would occur, and emergency access to the project site and surrounding residences would not be affected and there would be no impact.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

No changes to local roadways, such as Via de la Valle and San Dieguito Road, would occur, and emergency access to the project site would not be affected. The surrounding area is developed with grass fields and equestrian stables all for recreational uses. The proposed project is compatible with these uses and would not expose people to greater risk of wildfire. Therefore, no impact associated with interference with emergency response is anticipated.

Mitigation Measures

No mitigation is necessary.

X. Hydrology and Water Quality

Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐

The project is located within the RWQCB San Diego Region Basin Plan (Section 402 of the Clean Water Act). The Regional Water Quality Control Board (RWQCB) issues NPDES permits to regulate discharges to waters including stormwater and construction-related discharges. Potential impacts related to water quality could temporarily occur during typical construction activities when erosion, siltation, sedimentation, and accidental release of hazardous materials would have the highest potential to occur. Construction of the project would require limited vegetation clearing and minor grading that could potentially result in erosion during these activities. Implementation of the Water Pollution Control Program (WPCP) would be required by the project permits and would include specific temporary BMPs to avoid or reduce potential impacts related to erosion. These measures include using fiber rolls and silt fences during grading and establishing a construction staging area where construction supplies are contained away from sensitive areas.

The CTC Trail does not contribute any pollutants as a non-vehicular use. Daily ranger patrols include litter removal and trail maintenance in accordance with the JPA's Trails Management Plan and Standards (2016). A small amount of horse manure may be found along the trail on occasion. Trail usage by equestrians in this area is low based on observations of nearby segments of CTC Trail. Higher equestrian use is more common along backcountry trails and less so in more urbanized areas such as the project area. Horse manure is more typically found in larger quantities at equestrian staging areas, not along the trail. Based on experience and observation along other segments of CTC Trail, manure generally stays on the trail and decomposes in place. Any larger quantities of manure found during regular trail patrols would be collected and disposed of by park rangers.

The trail design minimizes runoff (e.g., compacted trail surface, graded with cross-drain design to limit erosion and direct flow across the trail and into the surrounding native soils), and the trail would be regularly maintained to minimize pollutants (as is other segments of CTC Trail). Operation of the trail

would not necessitate use of permanent treatment control BMPs. Therefore, the proposed project would not violate waste discharge requirements or impact surface or ground water quality. Impacts related to hydrology and water quality would be less than significant.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☐	☒

The project would not require the use of any groundwater nor would it interfere with groundwater use. Therefore, no direct or cumulative impact on groundwater resources is anticipated. No impact would occur.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or through the addition of impervious surfaces, in a manner which would:				
i) Result in a substantial erosion or siltation on- or off-site;	☐	☐	☒	☐

The Project includes a pervious trail and an impervious trail bridge crossing designed to span the San Dieguito River channel. The bridge would span the river and not alter the course of the river nor any drainage patterns. Erosion during construction would be prevented by using standard required BMPs (fiber rolls and silt fences) to prevent loose soils from eroding into the adjacent habitat or river. Construction would not occur during rain events. The project would not cause or result in substantial erosion or siltation. Operation of the trail would not trigger the need for permanent treatment control BMPs. Impacts would be less than significant.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;	☐	☐	☒	☐

The proposed project would not impact surface runoff to a substantial degree. The trail is a pervious surface and would not change the direction or rate of overland flows or the behavior of surface runoff in the floodplain. The trail bridge is designed to convey river flows and overtop during larger storm events and would not affect water surface elevations upstream of the site. See answer to iii below. Impacts would be less than significant.

iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐

The project area is vegetated open space and no stormwater drainage systems exist in the area. Runoff from the trail and bridge may occur during heavy rain events as the site is located within a floodplain. The trail would be designed to allow runoff to flow across the trail to the surrounding pervious and vegetated areas and would not carry sources of substantial pollutants. Some ponding on the trail is normal during light rain events and would slowly soak into the trail surface. The trail would be regularly maintained to remove litter and repair trail drains and areas of potential erosion, which would minimize sources of pollutants. Bridge runoff during rain events would flow into the river. However, pollutants on the non-vehicular bridge would be minimal and not a substantial additional source of polluted runoff. Water quality impacts related to stormwater runoff would be less than significant.

iv) Impede or redirect flood flows?	☐	☐	☒	☐

The Osuna Trail Segment Hydrology and Hydraulic Analysis (Kimley Horn 2023) included a study area spanning 1,000 feet upstream and downstream of the Project Site and considered other nearby existing bridge crossings in the area including the Morgan Run Golf Course bridge (upstream). The main river channel conveys local drainage flows and small storm events (up to 10-year storms); larger storm events overtop the channel banks and expand over the wide floodplain (Kleinfelder, 2015). It was determined to be infeasible to span the entire 100-year floodplain with a bridge due to the floodplain width of over 1,000 feet in the project area (Kleinfelder, 2015). The proposed bridge would span the main river channel. The bridge structure is designed to withstand storms and flood events without affecting upstream water surface elevations and will convey river flows during 1- to 10-year storms (with 1.5 feet of freeboard) and overtop during larger storm events. Spread footings are proposed that minimize impacts to the channel bank during lower flow velocities for the smaller storm events of the 1-, 1.5-, and 2-year storm. The design and placement of the project would minimize the potential to impede or restrict flows. See Appendix C and Appendix E, *Hydrology Report, Osuna Segment of the Coast to Crest Trail Project*, for more information on the bridge design. Impacts would be less than significant.

d) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☐	☒

The recreational use would not use or interfere with groundwater at the site. No groundwater management plans exist for the project vicinity. Therefore, as noted above, project implementation would not have the potential to result in significant adverse impacts to surface water and groundwater quality or otherwise conflict with the Basin Plan. Impacts would be less than significant.

Mitigation Measures

No mitigation is necessary.

XI. Land Use and Planning

Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☒

The Whispering Palm residential community is located nearby to the northwest of the project site, but the Project is not proposed in the residential area and would not interfere with existing homes. Therefore, the proposed project would not disrupt or divide the established community nor have the potential for cumulatively considerable impacts on an established community; therefore, no impacts would occur.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

The project would contribute to the completion of a regional trail, the Coast to Crest Trail, which is included in and consistent with the San Dieguito River Park Concept Plan and the County of San Diego Regional Trails Plan. The project would not conflict with any other land use plans and is consistent with the open space, recreational, and agriculture zoning of the area. therefore, no impacts would occur.

Mitigation Measures

No mitigation is necessary.

XII. Mineral Resources

Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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?	☐	☐	☐	☒

The Project site is not designated for mineral resource extraction, nor is it currently or historically been utilized for mineral resource uses. As such, no impacts relative to mineral resources would occur.

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?	☐	☐	☐	☒

The Project would not 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.

Mitigation Measures

No mitigation is necessary.

XIII. Noise

Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐

The Project would increase recreational use of the area, a use which is compatible with the other recreational uses occurring in the project vicinity such as golfing and sports fields events and would not increase the ambient noise levels to exceed the City of San Diego sound level limits (§59.5.0401) nor the County of San Diego General Plan and County of San Diego Sound Level Limits (§36.404). The proposed trail segment and bridge would be occupied by daytime hikers, cyclists, and horseback riders during the day. The trail would be closed at night. The trail would be passively used and would not be open to motor vehicles. The proposed project would not involve any uses that may create substantial temporary or periodic increases in ambient noise levels in the project area. Routine maintenance of the new trail segment would be consistent with the maintenance activities on other segments of the CTC Trail and would not involve high-intensity noise sources.

Noise levels from temporary construction activities associated with the project are expected to comply with the applicable City of San Diego and County of San Diego construction noise limits at all surrounding property lines with activity limited to the daytime hours of 7 a.m. to 7 p.m. during all phases of construction, as designed. Construction operations would occur only during daytime hours and during permitted hours by ordinance. Also, it is not anticipated that the proposed project would operate construction equipment that would exceed 75 decibels (dB) for more than 8 hours during a 24-hour period. Therefore, the proposed project would not result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity. Therefore, the impact would be less than significant.

b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒

The proposed project does not involve a land use that would generate groundborne vibration or noise levels on site or in the surrounding area.

Temporary construction activities, such as excavation and grading, may produce typical minor localized ground-borne vibration of the construction activity. Impacts from construction-related ground-borne vibration, should they occur, would be intermittent and confined to the immediate area surrounding the activity. The Project would not use high-intensity methods such as pile driving or blasting. Therefore, the Project would not generate excessive groundborne vibration or groundborne noise levels on a Project or cumulative level. Therefore, the impact would be less than significant.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such as 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?	☐	☐	☐	☒

No airstrips are located within the vicinity of the Project nor is the area subject to any airport land use plan. Therefore, no impacts would occur.

Mitigation Measures

No mitigation is necessary.

XIV. Population and Housing

Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Induce substantial unplanned 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)?	☐	☐	☐	☒

The Project would not result in the construction of homes or businesses or roads. Therefore, the Project would not directly or indirectly induce population growth in the area. No impact would occur.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

No existing residential structures are located on the Project site, and therefore, implementation of the Project would not displace housing. Homes in the vicinity of the Project would not be affected, therefore no impacts would occur.

Mitigation Measures

No mitigation is necessary.

XV. Public Services

Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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?	☐	☐	☒	☐

Fire protection and emergency services are provided by the Rancho Santa Fe Fire Protection District. The closest fire station 3 located at 6424 El Apajo, Rancho Santa Fe, CA 92067 and is approximately 1 mile east of the project site. Del Mar Fire Department is located at 2200 Jimmy Durante Blvd, Del Mar, CA 92014 and is approximately 3 miles west of the project site. As discussed, the Population and Housing section, the proposed project would not result in an increase in population; therefore, impacts would be less than significant to fire protection services.

ii) Police protection?	☐	☐	☒	☐

The San Diego County Sheriff's Department is the primary responder for the project location. The proposed project is in the service area of the Sheriff's Department's North Coastal Station, located approximately 7 miles north of the project site at 175 N El Camino Real, Encinitas, CA 92024.

The proposed project would result in the extension of an existing CTC trail and is compatible with other recreational uses in the area. Police protection is expected to remain at current levels in the project area and trail use would not interfere with or change service. Therefore, the proposed project would not result in an increased demand requiring the need for new or physically altered police protection facilities. Impacts would be less than significant.

iii) Schools?	☐	☐	☐	☒

The Project site is located within the San Dieguito Union High School District boundary. There are no other public schools within 2 miles of the project site. The Project does not generate population or demand for school facilities. As such, school services would not be impacted.

iv) Parks?	☐	☐	☐	☒

The Project would not impact any existing parks and would instead expand recreational use for the existing population. The trail segment would enhance recreational opportunities in the area and implement the San Dieguito River Park Concept Plan. Therefore, the proposed project would have a positive impact on recreational use. No adverse impact would occur.

v) Other public facilities?	☐	☐	☐	☒

As discussed above, physical impacts on public services are usually associated with population in-migration and growth, which increase the demand for public services and facilities. The proposed project

would have no effect on population growth. Therefore, the proposed project would not result in an increased demand requiring the need for new or physically altered public facilities; therefore, no impact would occur.

Mitigation Measures

No mitigation is necessary.

XVI. Recreation

Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
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?	☐	☐	☐	☒

The Project would implement the recreational plans adopted for the area and improve recreational opportunities for the existing population. The trail would contribute to the implementation of the San Dieguito River Park Coast to Crest Trail, a regional recreational use in the County. Therefore, the impact would be positive and not adverse.

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?	☐	☐	☐	☒

The Project is a planned trail of a regional recreational facility and is designed to minimize impacts on the environment and would improve existing recreational amenities. The San Dieguito River Park Concept Plan addresses the need to design trail facilities that do not impair open space and its resources. The project would adhere to the Design Standards contained in the Concept Plan.

Mitigation Measures

No mitigation is necessary.

XVII. Transportation

Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☐	☒

The project would not conflict with any plan for the existing circulation system and would implement the regional CTC Trail identified in the SDRP Concept Plan and County Trails Master Plan. The project would expand non-vehicular use and improve the bicycle and pedestrian network by connecting to an existing public road. No adverse impacts would occur.

b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3 Subdivision (b)?	☐	☐	☐	☒

During project construction, primarily heavy-duty trucks will be utilized. CEQA Guidelines Section 15064.3, subdivision (a), states, “For the purposes of this section, ‘vehicle miles traveled’ refers to the amount and distance of automobile travel attributable to a project.” Here, the term “automobile” refers to on-road passenger vehicles, specifically cars and light trucks, rather than heavy construction vehicles.

The project would not result in any permanent increase in VMT exceeding thresholds identified in the City of San Diego Transportation Study Manual. The Project is presumed to have a less than significant transportation VMT impact because it proposes the “addition of Class I bike paths, trails, multi-use paths, or other off-road facilities that serve non-motored travel,” per Appendix D of the City of San Diego’s Transportation Study Manual (September 2020). Therefore, no VMT impact is expected to occur.

The proposed project would not likely generate new vehicle trips by any measurable degree. The project extends the existing CTC Trail by 1 mile, is consistent with the SDRP Concept Plan, and does not introduce uses that would add vehicle trips resulting in more vehicle miles. The project would contribute to the availability of recreational trails in the region, and the recreating public would otherwise use other trails if this project was not built. Vehicular access and parking at an existing trailhead located approximately 2 miles to the west of the project would adequately serve trail users to the proposed additional mile of new trail. Non-vehicular access to the proposed trail for pedestrians and bicyclists also exists in the surrounding community. The project would not result in added vehicle trips and would not result in a direct significant impact. In addition, the proposed project would not conflict with policies related to non-motorized travel such as mass transit, pedestrian, or bicycle facilities. No impacts would occur.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☒

The project proposed does not impact or involve any changes to existing roadways. Therefore, no hazards would result from the proposed trail segments. No impacts would occur.

d) Result in inadequate emergency access?	☐	☐	☐	☒

The proposed project would not close roads or access points. Emergency access would not be affected. The trail would be accessible from San Dieguito Road for emergency vehicles. Therefore, the proposed project would result in no impacts related to inadequate emergency access.

Mitigation Measures

No mitigation is necessary.

XVIII. Tribal Cultural Resources

Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or	☐	☒	☐	☐
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in Subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

JPA staff sent AB 52 notices via certified mail to the San Luis Rey Band of Mission Indians, Rincon Band of Luiseño Indians, and the San Pasqual Band of Mission Indians, tribes traditionally and culturally affiliated with the project area. Additionally, on January 31, 2023, the City of San Diego notified the Iipay Nation of Santa Isabel and the Jamul Indian Village via written communication. The San Pasqual Band of Mission Indians responded with a request for a site meeting. No response was received from the San Luis Rey Band of Mission Indians nor the Rincon Band of Luiseño Indians within the 60-day period to request consultation and additional information nor were responses received after additional communication attempts. The Iipay Nation of Santa Isabel and Jamul Indian Village did not request for formal consultation within the 30-day notification period.

JPA staff met with a representative from the San Pasqual Band of Mission Indians on October 22, 2021, for a site walk of the proposed trail. The tribe representative identified the area as a Traditional Use Area and expressed concern with construction work along the riverbank and riparian area and recommended monitoring during initial earthwork construction. The JPA also provided a copy of the project cultural resources report as requested. JPA staff is working with the tribe with the goal of incorporating tribal cultural information into the trail interpretive panel and/or other aspects of the trail. The Project is located on a riverbank, berm, and fill. Most of the area, although not all, has been previously disturbed. However,

due to the potential sensitivity and tribal cultural significance of the project vicinity, the site being identified as a Traditional Use Area. A qualified Native American monitor would be present during project construction as required by the measure below (MM-CUL-10), which will reduce this impact to a less-than-significant level.

Mitigation Measures Incorporated into the Project

The project has been designed to be consistent with the Design and Development Standards contained in the San Dieguito River Park Concept Plan. However, additional measures are necessary to mitigate all cultural impacts from implementation of the project to a level of insignificance. The purpose of the following measure is to ensure the project does not impact unanticipated resources that may be discovered during construction activities:

> **MM-CUL-10.** A qualified Native American monitor shall attend the pre-construction meeting with the JPA project manager and construction contractor and be present to monitor initial ground disturbance for the project. Once they have determined that grading and other disturbances have removed soils with a reasonable potential for containing cultural material, monitoring can be reduced to as needed and when and if additional ground-disturbing activities continue in native soil. If tribal cultural material is encountered, the Native American monitor shall have the authority to temporarily halt or redirect ground-disturbing activity while the cultural material is documented and assessed. If a cultural resource is determined to be significant, the monitor shall coordinate to develop and implement appropriate treatment measures. Artifacts collected (if any) shall be cataloged, analyzed, and curated with accompanying catalog to current professional repository standards and transferred to an appropriate curating facility within San Diego County or returned to the consulting tribe for reburial or for curation at a tribal facility.

XIX. Utilities and Service Systems

Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐

The Proposed Project would not involve relocating or constructing new or expanded water, wastewater treatment, or storm water drainage, electric power, natural gas, or telecommunication facilities. Existing above-ground electric utility lines and power poles in the area would not be disturbed. The proposed project would not generate wastewater.

An underground (50 feet below grade) recycled water line, owned by the Olivenhain Municipal Water District (OMWD), was installed in the project area in 2019 and a portion of the project footprint would extend over the pipeline easement. The JPA's project engineers consulted with OMWD staff and designed the bridge and footings to avoid the pipeline to ensure the pipeline is not impacted. Trail grading would be minor in scale and depth and would not penetrate deep enough to affect the pipeline. JPA and OMWD staff will continue to communicate during final design and throughout project construction. The

JPA and OMWD will enter into a mutually acceptable joint-use agreement to share a portion of the pipeline easement area for the trail, which will be finalized prior to project construction. No significant environmental effects would occur.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☐	☒

The proposed Project would not involve or require permanent water supplies. Therefore, no impact would occur.

c) 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?	☐	☐	☐	☒

The proposed project would not generate wastewater therefore no impacts would occur.

d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☐	☒

The proposed project links to existing trails and the Lagoon staging area which provides trash bins for trail users to dispose of trash. Printed and posted park rules state that users should put trash in proper receptacles and clean up after their pets (dog litter bags are provided at the trail staging areas). The trail would be monitored and maintained by park rangers and volunteers, including litter removal and park rules implementation. The project would not generate solid waste therefore no impacts would occur.

Mitigation Measures

No mitigation is necessary.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☐	☒

The proposed project would not generate solid waste; therefore, no impacts would occur.

XX. Wildfire

Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒

The proposed project is in the City of San Diego and County of San Diego jurisdictions, both of which participate in the County Multi-Jurisdictional Hazard Mitigation Plan. The project complies with the General Plan. The proposed project would not disrupt emergency evacuation routes as identified in the Hazard Mitigation Plan. Emergency access would not be impacted, and the trail would not impede emergency access. Therefore, the project would have no impact on an emergency response or evacuation plan during construction and operation.

b) **Error! Not a valid link.**	☐	☐	☐	☒

The project is located in a Very High Fire Severity Zone. Implementation of fire safety procedures in the standard specifications during construction would reduce the potential for exacerbating fire risk due to construction activities to a less-than-significant level. Trail operation would not impact the risk of wildfire. Smoking is prohibited in all areas of the park including on trails and all trails are patrolled by professional park rangers.

The trail would be closed should the area be exposed to a wildfire, as is standard practice. The project would not significantly exacerbate wildfire risks, and no mitigation is required.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☐	☒

The project does not propose or require any new infrastructure that would exacerbate fire risk. No new construction of roads, fuel breaks, emergency water sources, power lines, or other utilities would be constructed and would be less than significant.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

Much of the nearby project area is developed with turf (golf courses and sports fields) and homes and is topographically flat and not susceptible to these types of risks. The project is located in a floodplain and is subject to flooding. The project is designed to not impede or impact upstream flood elevations or downstream river flows and would not exacerbate flooding. Refer to section X. HYDROLOGY AND WATER QUALITY regarding this matter. The trail would be closed during and immediately after storm events (where flooding is a concern) as are other segments of the CTC Trail, therefore impacts would be less than significant.

XXI. Mandatory Findings of Significance

Would the project:	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Does the project have the potential to substantially 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, substantially 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?	☐	☐	☒	☐

As described under Section 2.IV, *Biological Resources*, and Section 2.XVIII, *Tribal Cultural Resources*, the proposed project has the potential to impact wildlife and tribal cultural resources; however, impacts would be reduced to a less-than-significant level with the incorporation of design features and mitigation measures into the project. Specifically, the proposed project has the potential to result in significant impacts on special status plant species, migratory birds, vegetation communities, and potential waters of the U.S./state. Potential impacts to Band of San Pasqual Indians Traditional Use Area were identified. These impacts to biological and tribal cultural resources were determined to be less than significant with incorporation of mitigation measures listed in this checklist. Impacts would be reduced to a less-than-significant level.

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

The project is located on open space land and no known plans exist to change or expand existing uses in the vicinity including the two golf courses or soccer facilities. OMWD is currently conducting studies for potential groundwater extraction opportunities, but the trail project does not impact those efforts and no plans have been proposed. An invasives species removal project along the river channel is planned by the Fairbanks Ranch Country Club, but the timeline for that work is unknown and can be timed to not interfere with the bridge construction if necessary.

Further away to the west of the Project location there are several other future projects that will improve trail connections in the area including the City of San Diego El Camino Real Bridge Replacement and Road Widening Project, the SANDAG and Caltrans Lagoon Restoration Phase II project, and the City of Del Mar's River Path Del Mar Phase III Extension Project. The Project's impacts would be limited to the construction phase and would not be cumulatively considerable when the effects of past, present, and probably future projects are considered. Impacts would remain less than significant.

Permanent impacts on biological and tribal cultural resources are discussed in Section IV Biological Resources and Section XVIII. Tribal Cultural Resources, and direct project impacts were concluded to be reduced to a less-than-significant level with mitigation incorporated. As a result, the contribution of the project's less-than-significant impacts with mitigation on biological and cultural resources would not be cumulatively considerable.

c) Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☐	☒

The Project would improve recreational opportunities for the community and surrounding region and is considered a benefit to humans and not adverse. The project would improve non-vehicular connectivity and access and would have a positive impact. Construction impacts would be limited in duration and scope and no adverse impacts to human beings would occur.

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Appendix A Biological Technical Report

Appendix B Cultural Resource Inventory Report for The Osuna Trail (Confidential)

Appendix C Plan Sheets, Osuna Segment of the Coast to Crest Trail Project Preliminary

Appendix D Foundation Report, Osuna Segment of the Coast to Crest Trail Project

Appendix E Hydrology Report, Osuna Segment of the Coast to Crest Trail Project